

CARES Network Conference Call Q&A

May 19, 2020

The Texas Department of Housing and Community Affairs (The Department) has created the following document to assist its Subrecipients to answer applicable program questions. The document contains answers to the questions the Department received related to the CARES Contracts and other clarifications.

If after reading and referencing all these materials you still have questions, you may submit a program question by completing this form: <https://tdhca.wufoo.com/forms/request-for-ca-program-assistance>

1. We can obtain digital signatures, are these allowable?

Yes, digital/electronic signatures are allowable.

2. Can a client self-certify they have been impacted by COVID? Our application has a section where the client is asked to check a box if they have been financially impacted by COVID, does this suffice?

A check-box in and of itself is insufficient. You would need to document in case notes how the client was impacted by COVID-19 as well. If the self-certification has an explanation section, then it could be used.

3. If we know that the birth certificate record offices are now open in our service area, can we still use the citizenship waiver form, since it has not been rescinded?

No, the waiver form is ONLY for use when the client cannot obtain their birth certificate due to record office closures. It is not to be used, if the records offices are open.

4. Are we correct in thinking that a person on social security would not have a COVID-related need since their income was not affected? If anything, they received more money than usual (stimulus check).

Not necessarily. Income may not be the only factor for a COVID-19 related need. In addition, stimulus checks are “excluded” income. As with any CARES funds, the client must show or explain how COVID-19 has impacted their need for assistance.

5. If mortgage statement includes taxes and insurance, can we still pay full mortgage payment?

Yes, in order to avoid risk of homelessness, the full monthly payment may be paid. Retain a copy of the mortgage statement in the client file.

6. If we choose a limitation on payment of rent, how should we handle if their current rental is over that limit?

Rental assistance is for avoiding homelessness. If a partial payment will not avoid eviction, then you will need to leverage funds with partners, or have the client cover the difference, so that the assistance provided is effective. If you are considering limiting the dollar amount, HUD rent limits may be a good source for establishing reasonable thresholds:

<https://www.hudexchange.info/programs/home/home-rent-limits/>

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7. If funding is limited for rental assistance, after you serve priority populations, can we serve additional people using a lottery system since there isn't enough funding for all?

This is an agency-level decision. Establish a written COVID-19 procedure for how this will be handled and stick to it.

8. TDHCA compliance division asked during previous monitoring for lease agreements so it is highly suggested to obtain lease agreements for the files.

That is correct. You are to maintain a copy of the client's lease agreement or mortgage statement in the file. Payment is to be made directly to the landlord/owner or mortgage company.

9. If doing rental assistance, are we required to follow fair housing standards of HUD that we are required to follow for HOME programs?

No, the service is to prevent homelessness. You must have a copy of the client's lease agreement and make the payment directly to the landlord/owner.

10. If a client is requesting rental assistance and they are behind 6 months, all past due rent is not COVID-related, can we catch them up with CARES funds?

Remember that CARES assistance shall be provided for only COVID-19 impacts; therefore, limit the assistance to only the time period when the client lost employment or reduced hours as a result of the pandemic. Since this client was behind well before COVID-19, you could provide assistance under your regular CSBG contract if that is an acceptable policy at your particular organization.

11. Can one household be assisted under regular CSBG, CSBG-Discretionary, and CARES Act CSBG/CEAP?

It is feasible, but may not be prudent.

For CSBG, a regular CSBG client may now have additional COVID-19 related needs. These clients could be served out of regular CSBG and a COVID-19 contract. For clients above 125%, these must be served using the CSBG-D or CSBG CARES contracts with a documented COVID-19 related need.

For CEAP clients, **the benefit allowance is based upon program year (not contract)**. All regular CEAP rules for assistance remain in effect. Those being served out of CEAP CARES contract must have a documented COVID-19 related need and be income eligible. Once you identify which contract is appropriate, you should fully serve the household for the remainder of this program year out of that contract. There is no additional benefit by using both contracts, so DO NOT use both contracts for a household, as this may result in future monitor findings.

NEW WAIVER for CEAP: 2 utility bills (electric, propane, or gas) may be paid each month until rescinded by the Department, effective 3/27/2020. Keep in mind that the assistance provided must still stay within the maximum benefit allowance.

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12. Can a person who previously qualified for TOP still get help thru CARES program if they lost their job due to COVID?

It depends. If this was a previous TOP client, who achieved TOP, and now lost their job due to COVID-19, then yes. If this was a previous TOP client, who had not yet achieved TOP for 90 consecutive days then you should re-enroll in regular CSBG.

13. Can technology be purchased for GED students/TOP clients who are in school since they are now studying remotely? Will that suffice as a COVID related need?

If the technology is needed for the client to continue their education/certification due to classes only being offered remotely, then this could be considered a COVID-19 related need. With that said, proper procurement is required. A laptop or initiation of cell/internet service would require small purchase procurement. If they have existing cell/internet service, you could pay that vendor for the duration of the course.

14. Does the CARES ACT cover employees as well? As in rental assistance, food, and gas (fuel)?

If agency staff are eligible for the programs, then they may be served. However, you will want a written policy or procedure as to how these applicants will be processed. There must be separation of duties (i.e. - application and eligibility determination conducted by a supervisor or non-relative/friend), with Executive Director approval for payment. The staff must be treated and processed like any other applicant and not placed ahead of other clients.

15. Are we required to have our Matrix pre-approved by TDHCA?

No, your Matrix is determined at the local-level, based upon identified needs, funding availability, and identified services/outcomes to be achieved.

16. So gift cards can't be a \$100 Visa Card which is just like cash? Do the clients need to turn in receipts for purchases with gift cards?

Pre-loaded Visas Cards are like cash. These are not allowable. You may purchase gift cards for specific needs through local vendors, for such things as: food, essentials, gas. The client file must clearly note the purpose of each gift card. Clients are not required to provide receipts to prove what the card was used for.

Agencies who use gift cards must have strong internal controls. Each card must be accounted for and associated with a client need noted in the client file. Gift cards are to be kept in a secure location with strict oversight. Subrecipients should have a clear written policy/procedure developed for gift cards.

17. Will the CEAP CARES funding guidelines be the same as the current CEAP?

Yes. All program rules apply.

18. Is a past due utility bill sufficient to count as a disconnect notice?

Not necessarily. You will need to determine if they are "at risk" of disconnect barring the moratorium. Check with your utility vendor.

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19. What do we need to look for to pay utility bills out of Crisis Assistance funds?

Crisis Assistance has two components for assistance. 1) Household must be “at risk” of losing service or have lost service AND 2) there must be a weather crisis (as per your CEAP Service Delivery Plan), a disaster (as declared by the Governor or President), or life threatening condition, as outlined in 10 TAC §6.310 (a) (1-3).

20. Can CSBG funds be used to pay for WAP training, once WAP TTA funds are expended?

CSBG funds can only be used if it is identified as “CSBG Support for WX” direct client assistance in the CSBG budget. CSBG funds cannot pay for any administrative costs related to LIHEAP. Training is an administrative cost, therefore neither CSBG nor any other federal funds can be utilized to support LIHEAP administrative costs per the LIHEAP statute.

21. Under pre-award costs, does that pertain to costs for computers or other costs that are not a direct service? Example, we have to do computer programming for CARES reporting.

Additional operational costs to effectively administer the CARES Act contracts are allowable pre-award costs. Pre-award costs may include direct client assistance that was provided prior to receipt of contract. Keep clear, detailed documentation. As with any purchases, proper procurement is required.

22. What instructions do you have for us regarding pre-award costs out of CSBG/CSBG_D for charging CSBG CARES when received?

In addition to having clear documentation of COVID-19 related need for each expense, and to ensure no double dipping, Subrecipients are to report any adjustments from their current contracts MER as an expense that will match on their CARES contracts MER.

23. It was stated that we need to report families in all contracts if they received services from that contract? Will we not report once to keep it an unduplicated count? Or am I to understand that a household who may be assisted under the regular contract and the COVID-19 contract will have to be data entered in both contracts?

Unduplicated counts are reported by contract. The Department will need reports to be separate for CSBG, CSBG_D COVID, and CSBG CARES Act.

We will be reporting under a different annual report for CARES Act.

24. Will the due date for the additional reporting be the 15th of each month as well?

All reports will be due the 15th of the month.

25. With previous CSBG, CSBG -D, CEAP contracts we only reported performance on one contract? Why the change that we report on each performance report?

The Department must track COVID related assistance by contract. Federal requirements require that the Department issue separate contracts for CARES and must account for funding and performance under those CARES contracts.

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26. If we have been awarded CSBG-D contract, is the MPR in the contract system for reporting now?

Yes.

27. Can you reiterate the deadline for the CSBG-Discretionary COVID contract?

CSBG_D COVID Contracts (this is not a CARES contract) expire 8/31/2020.

28. When should we expect to receive the CARES contracts? When will the contracts for CARES Act be ready for signature?

The Department has received the award letter this past week and we are routing contracts now. The Department plans to issue contracts in the next few weeks. Target date mid-June to end of June.

29. What will be the terms of the CARES grant?

The contract term will be 3/27/20-7/31/21. Any assistance must be to a documented COVID-19 related need.

30. What is the deadline for the CARES needs assessment?

It is due, along with your CARES CAP and Budget, 30 days from receipt of your CSBG CARES Act Contract.

31. Are we required to have a public hearing on the CARES Act? Can the public hearing requirement be waived?

No, you will not have to hold a public hearing for the CARES Budget. These funds are considered supplemental CSBG funds, AND there is currently a waiver of Texas Government Code 2105.058 regarding public hearings. It is a Best Practice to hold a public hearing for this budget, but it is not currently required.

32. For the extended Organizational Standards submission, are documents for the original window of September 30th?

Yes, the extension is to provide you additional upload time. Only documentation for FY20 (October 1, 2019-September 30, 2020) is to be submitted.

33. Where is the new Organizational Standards guide located?

It may be found under the header "CSBG Organizational Standards," here:

<https://www.tdhca.state.tx.us/community-affairs/csbg/additional-requirements.htm>

[Organizational Standards Guide for Public and Private Eligible Entities \(PDF\) – Updated April 2020](#)