



CAPLAW Webinar Transcript

Mastering the A-B-CSBGs: A Four-Part Fundamentals Series

Uses of CSBG Funds

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[Veronica Zhang, CAPLAW]

All right, hello everyone and welcome to Tuesdays with CAPLAW in January, otherwise known as “Mastering the ABC-S-B-Gs” webinar series. We’re excited to be here with you on the day after the MLK holiday, talking about Uses of CSBG Funds. Thank you to those who have already started the round of greetings in the chats. One of my favorite things about Community Action is the roll call, and just getting to see the breadth of the network across the country. So, welcome to those of you who are joining us.

If you were here with us last week, you know that we are in a four-part series on mastering the fundamentals of the CSBG block grant program. And today, our topic will be uses of CSBG funds. So if you missed last week’s webinar, that was on tripartite board selection and composition. A recording of that webinar is available on our Resource Library, and you can access that along with a copy of the slides for that webinar. We will be doing as what we’ve done in the past—we’ll go through the webinar today, and the slides and the recording will be made available to you after this webinar. And so you can always come back to this webinar and access that.

My name is Veronica Zhang, and I’m the Deputy Director and Senior Counsel at CAP law. I’m joined today by my colleague Jon Cohen. And the two of us are going to tag team this tricky presentation on uses of CSBG funds. So if you joined us for it, thank you for being with us. We hope that this will be clarifying in terms of the requirements that apply to CSBG.

So with that, the agenda for today is fairly simple. But simplicity in the agenda doesn’t mean that it’s a simple presentation. We’ll talk about some of the laws and guidance that apply to Community Services Block Grant funding. And then the bulk of the presentation will be spent presenting a framework for evaluating whether a cost is allowable and can be charged to the CSBG program. We then will work through some questions that we have received in advance as you were registering for the webinar series. But we’ll also take questions from the audience about particular costs that you might have in mind. I’ll just say as a caveat that some of the questions that may come in can be very fact specific and detailed. And so, if it’s one of those types of costs that might require more in-depth analysis, more back and forth with you, we may reach out to you or ask you to send those questions to us as a consultation question so that we can work directly with you to talk about the allowability of that cost.

But we do want to leave everyone here today with a framework for how you might go about evaluating whether a cost is allowable or not. So first, let’s look at some laws and guidance for CSBG. If you’ve been to CAPLAW webinars or presentations in the past, you might be familiar with this slide. It’s a slide that we include in a lot of our presentations. I’m not going to go through this in detail, because we’ve done that in other places. But the point is that when you’re thinking about a question, you know, is this

cost allowable under CSBG, you have to think about the universe of legal requirements that might apply to that cost, that might not apply to CSBG. And so here we've really tried to list the universe of program-related requirements that apply to CSBG.

You see the federal Act, and there are block grant regulations that are issued by the Department of Health and Human Services that has a small section on that applies to Community Services Block Grant. It's very light compared to other types of grant regulations that you might see for other federal programs. You have the Uniform Guidance, which we'll spend some time talking about, as well as Information Memorandum, or non-binding guidance issued by the Office of Community Services. In particular, today, we're going to be focusing on one IM—IM #37, that talks about the purposes and uses of CSBG funds and how it differs from other federal funding sources. And then lastly, your state may have CSBG regulations, statutes, guidance, and award terms and conditions that provide additional guidance or limitations on how you can spend your CSBG funding.

The key takeaway from this list is that states are primarily responsible for grant administration. This is true for all block grants, not just CSBG. But you have to keep that in mind when you're thinking about CSBG, especially compared to other programs, such as Head Start, which is directly administered by the federal government. And so the federal government has a lot more authority in terms of interpreting its own authorizing statute and program regulations, than for CSBG. It's states who are primarily responsible, the federal Act has restrictions and limitations, as we'll see, but there's a lot of gray.

And so for Community Action Agencies, this is actually a great thing to keep in mind because what you're doing when you're working with your state office is, you're advocating for why the cost that you have in mind should be charged to CSBG. And states that are on this call should also, you know, enjoy the type of flexibility that you have in terms of being the primary arbiters of CSBG questions—Community Action Agencies will come to you first.

So with that, we'll look at the distribution of funds under the CSBG Act. On the next slide, you'll see that under the CSBG Act, the federal Act, 90% of the funds that are appropriated each year for CSBG must be passed through to eligible entities. So states receive that award—their allocation from OCS—they have to distribute 90% of that to eligible entities based on a formula for that state. The remaining 10% funds, we call them 10% funds because they are held on to by the state, up to 5% of those can be used for the state's own administrative costs. And then the remaining 5%, the remaining half of the 10% funds, states have discretion as to how they spend that funding. They can use that funding to support T/TA efforts in the state. And oftentimes they do by supporting the state association in that state, or by providing T/TA themselves. They might coordinate some statewide programs and services. And we know some states have done that—funding innovative approaches and programs and activities. But lastly, it's important to keep in mind, the 10% funds can support other activities consistent with the purposes of CSBG. So there's this catch-all provision that applies to this 10% discretionary funding for the state that allows them to spend the money as they choose.

We had received a question in the webinar registration process asking if there's any guidance on how states might prioritize use of this funding? And the simple answer is, there's no additional guidance, you have this list of examples that the federal Act gives you. So you'd have some ideas here, you can look at what other states do, look at your sister states to see how they've used that funding. Think about the needs in your own state. And then ultimately, you can prioritize giving funding directly to existing Community Action Agencies to support their efforts. So you can provide them more than the 90% that's required to be passed along to them. Or you can fund other types of statewide T/TA activities in your state.

All right, so I want to introduce now the framework that we're going to be working through for the rest of the slides. So this webinar is a little bit different from other Uses of CSBG Funds webinars that we have done in the past—you may have attended one from CAPLAW—in that we're not just going to run through a list of requirements. What we want to do is give you a sort of order of operations, as you're thinking about: Is a cost allowable under CSBG? Can I charge this cost to my CSBG funding? This is the same order of operations that we at CAPLAW use when we're analyzing questions that we receive. And so we want to give you this tool so that you can also be thinking the way that we as lawyers are thinking about this question.

It's five steps. The first is a general, "Is this cost supported by the community needs assessment of our Community Action Agency, and our Community Action Plan?" And as we'll talk more in the following slides, you don't make decisions about whether or not costs are allowable under CSBG in a vacuum. We're not just thinking about theoretical costs, you're thinking about the needs in your community, and how you can show that the cost that you have in mind is supported by the needs assessment that you've done in your community.

Second, you want to ask, "Are there any limitations or restrictions that apply to this cost under the federal CSBG Act?" The federal CSBG Act does have some prohibitions as well as some limitations on how you can use your CSBG funding. And off the bat, you want to know if any of those will apply to your funding.

The third is, "Are there any limitations or restrictions under the Uniform Guidance?" Now, there are two parts to think about for this question. The first is that there are some basic cost considerations under the Uniform Guidance, things like, is the cost necessary, reasonable, and allocable? Is it charged the right funding period? These are the basic cost considerations that apply to any cost that is charged to a federal grant. Then second, those of you who are familiar with the Uniform Guidance know that there is a subpart in the Uniform Guidance—Subpart E, which has selected items of cost that give you examples of costs that are allowable and unallowable under the Uniform Guidance, and what kind of guidelines have to be in place for a cost to be allowable.

So you're looking at the federal Act, you're looking at the Uniform Guidance. The next is to look at any state level rules or guidance that might apply to your Community Action Agency. Sometimes states have additional rules. Again, going back to the slide earlier, we said the key here is that states are the primary administrators of the CSBG funding. States cannot take positions that are, that contradict the Community Services Block Grant Act at the federal level. However, they can add requirements, so long as they are not inconsistent with the federal Act. And as we'll see, there's a lot of deference that's given to states in interpreting the federal Act.

Lastly, you might get through these four steps and say, I still don't have the answer. That was not a very useful framework. Thanks, CAPLAW. And so, then you get to the fun part, which is, what arguments can you make to show that that cost supports the purposes and goals of the CSBG Act? In our world, sometimes there are no black and white answers. And that's a good thing. We think that can be frustrating for those of you who have to administer the funding. But the truth is that there's a lot of gray in the statute, a lot of gray under the Uniform Guidance. And even under the federal rules have, after you've passed all of those, those barriers, you're asking, well, how do I show that this cost supports the purposes and goals of CSBG? And that will connect back to your community needs assessment, your Community Action Plan. But then importantly, the guidance that's found in OCS IM 37 will provide some arguments in support of those costs. And we'll work through some of those as well.

So with that, let's start with step one, which is, is the cost supported by your community needs assessment and your Community Action Plan? And this really comes down to, what are the purposes and goals of the CSBG Act? For those of you who haven't read the CSBG Act in a while, those purposes are: to reduce poverty, to revitalize low-income communities, and thirdly, to empower low-income families and individuals to become self sufficient. Broad goals, as you can see. They're not very program-specific. You can think of a lot of different ways to meet these purposes and goals. But it is important to keep these in mind. Because when you're in that fifth step, when you're arguing for why costs can support CSBG, you're thinking about how that cost furthers one of these three goals.

Now, again, these costs are not developed in a vacuum, you're not just thinking about, well, any costs that could reduce poverty or revitalize low-income community or, or empower communities. You're thinking in, the next slide, about how this cost is supported by the needs in your community? And how have you determined those needs? You have agreed to conduct a community needs assessment, and to develop a Community Action Plan that's based on those, that community needs assessment. And that draws in those needs that are in your community. So I don't have to tell you how you might conduct your community assessment, those of you who have done this before, you understand that process of understanding the needs in your community. But all that to say is, the first question to ask when you're asking is this cost allowable for CSBG is, how does it further the needs in my community, and therefore the purposes and goals of the federal CSBG Act? And so if you can tie it to a need in your community, that's the first step.

Part of tying it to your community's assessment and Community Action Plan is whether those services are provided to income-eligible clients. And so, one of the requirements of the federal CSBG Act is that services are provided to clients who meet the income eligibility requirements in your state. So that's just something to always keep in mind as well. Currently, under the most recent federal appropriations act that was passed, states can allow income eligibility to be set at 200% of the federal poverty line. The Federal CSBG Act says 100%, but states can go 125%. The federal appropriations act adds now that states have the flexibility to adopt 200% of the federal poverty line as the income eligibility guideline that, again is at the discretion of the state.

We do have to resources at CAPLAW that talk about income eligibility, because even in within income eligibility, there's a lot of flexibility that Community Action Agencies can have, in terms of defining what income includes, how often a CAA is reevaluating income. During the pandemic, we learned that people can fall quickly into poverty at oftentimes a moment's notice. So how do Community Action Agencies keep that in mind so that services are provided to those who are in need, even if they didn't meet that definition a month ago or two months ago? There are flexibilities within income eligibility that enable Community Action Agencies to serve those who are most in need of them. So, just want to flag these two resources which you can find on our resource library.

I just want to flag right before we jump into the next slide is that there have been ideas for how we can create a mnemonic based on this, this framework. So, we will not take responsibility for those now. But if they are helpful to you, please, by all means, use them. But with that, I'm going to pass it to Jon, who's going to talk about the next step in the process.

[Jon Cohen, CAPLAW]

Absolutely. Thanks, Veronica. And yes, definitely encourage everyone to be as creative as possible when trying to figure out how to remember these particular steps. So, as Veronica mentioned, I'm going to take you through the next few steps in this process that were that was outlined prior.

And the second step really is taking a look at the CSBG Act, take a look at what some of the cost limitations in the Act may be. These are things that are included in the federal CSBG Act that may limit or prevent what a CAA can use it, CSBG funding, for, on these particular slides. It really talks about, you know, the CSBG Act, as we all know, is a block grant which tends to be more flexible and give states the ability to administer that grant with some flexibility. But there are some strings attached. And here are some of the, quote unquote, “strings” that are attached to CSBG funding.

The bullet points that are not bolded are things that won't really be covered in this session. But that were covered in the prior Mastering Your A-B-CSBGs. The webinar on, for example, type of tripartite board, which is available on our website as Veronica mentioned, designation of sub-recipients, reduction, and termination as well will be talked about in a later webinar. But those ones in bold are things that have been discussed by Veronica in this session, or where we will discuss. And so, funding allocations, as she mentioned, CSBG client eligibility, as she just talked about and presented those resources that CAPLAW has there. I'll talk a little bit about carryover and the rules related to that for CSBG funds, and then some specific limitations on the use of funding for buildings and facilities, lobbying and political activity. And with regard to using CSBG as a match for your other federal funds. So just wanted to highlight here, the fact that it is a broad block grant, but there are some things that need to be remembered when thinking about how CSPG funds can be used.

So the first CSBG Act cost limitation to talk about really is buildings and facilities. Just as an overview, CSBG funds cannot, you cannot use your CSBG funds to purchase or improve land, or purchase, construct, or permanently improve a building or, or other facility of your CAA. So, very important issue here that we get questions about quite a bit. That is the broad limitation on the CSBG Act. And so you might be thinking, well, what does it mean to permanently improve a building? You know, we're doing this particular, we're doing some particular work on our facility. Is that, is that a permanent improvement? Is it just, you know, let's say maintenance or to bring something into into repair or something like that? How do we conduct that analysis at our CAA?

Well, it's seeing if that work is, quote unquote, a “permanent improvement” if it materially increases the permanent value of the property, if it appreciably prolongs the life of that property, or it puts rather than maintains the property in efficient operating condition. And so you're really thinking about those things that will add value to your building or your property, the things that will, you know, let's say not just keep things running, but perhaps make it runnable or make it operational in that sense. So thinking about it that way, is really what you're thinking about when you're thinking about permanent improvements. There is an exception in the CSBG Act for low-cost residential weatherization or other energy related home repairs. So remember that, keep that in mind. That exception does exist.

In addition to that, CAAs can get a federal OCS waiver, that's available on request, for what are called extraordinary circumstances. A couple of key pieces to this. The states actually have to request this waiver from OCS. This isn't something that a CAA can essentially fill out a form and request that waiver from OCS. It has to essentially, the CAA has to go through the state to essentially request that waiver.

And so, what do we mean by extraordinary circumstances? What does that mean? When might a waiver be granted? Some examples of that: you can't find suitable or affordable rental facilities that are available in your community. To use it, there might not be other sources of funding for the projects that's available. A unique facility or improvement necessary to carry out a particular program that's needed is another example of an extraordinary circumstance. And then maybe there's an immediate need for improvements due to something like a natural disaster. Those are those are things that could rise to the level of an

extraordinary circumstance. Again, the state will need to request that from federal OCS.

Some examples that we've seen where OCS has granted in the past, these particular waivers, when there has been, you know, extraordinary human suffering or destruction of property that's been caused by natural disaster, is an example that we've seen. In addition to that maybe there's an exceptionally high incidence of poverty in a particular area. And so there have been examples of that happening. In addition, maybe there's been a service center located in an architectural historic area that could not really be renovated or expanded and needed to be replaced. It's another example where we've seen this particular waiver granted, and so some things to keep in mind.

Another thing to keep in mind, one, you see a resource on the slide right here, this is a CSBG block grant Q&A, that CAPLAW released a few years ago, that really talks about all these property issues, and really goes through the analysis of what the particular provisions of the statute are, and various provisions of the Uniform Guidance, which I'll talk about the Uniform Guidance in a minute, that relate to property. But I think this can be a really great place to go if you have questions on this, in addition to content available on our resources page.

As mentioned in the prior slide, we're really, with regard to this prohibition, thinking about permanent improvements. That's not to say that all building related expenses are prohibited, not all building related expenses are prohibited. And here are a few examples of what might be an allowable cost related to a building related expense. So maintenance, and repair, for example, and you see some Uniform Guidance citations there, which really talk about these and really spell them out, for example, maintenance and repair. These are costs incurred for necessary maintenance, repair, upkeep of buildings and equipment, which neither add to the permanent value of the property, nor appreciably prolong its intended life, but keep it in efficient operating conditions. So again, we're thinking about things that keep things in operating condition with regard to maintenance and repair, and not adding permanent value to the property as a result.

In addition, allowable costs include rearrangement, and alteration. Let's say you need to rearrange, you know, essentially, the inside of a building to get it repaired for a particular program, that can be allowable. Again, you're really focused on, is the thing I'm doing or altering or rearranging, going to add permanent value, or be a permanent improvement to this building? If it doesn't add permanent value, then then it's arguably allowable under these regulations. In addition to that, interest on mortgage, interest on a mortgage or a loan for an improvement cost, we have analyzed this and believe it is a financing cost, rather than the cost of acquisition, acquisition cost related to property. And for that reason, under the Uniform Guidance, financing, in these ways, and interest on that type of financing, would be an allowable cost. And so we take the position that it is allowable, and the analysis for that, again, the full analysis is included in the Q&A on the right. And then depreciation costs as well would be an allowable costs related to building buildings and facilities.

[Veronica]

So Jon, we've gotten a couple of questions here related to buildings and facilities. And so maybe we'll just take a few of them so that we can answer some of them, but also make sure that we cover the rest of the content. So, there's a question about repaving a parking lot and whether that would fall, how that would fall under this analysis.

[Jon]

Yeah, so repaving a parking lot, I think, would fall under the type of expense that's really maintenance of that particular parking lot. Unless, let's say, you're repaving it with, with something that's significantly more

valuable or expensive than what was there before. If say, you're replacing your asphalt parking lot with gold, that might be something that would be not allowable. But just typical, you know, maintenance and repair of a parking lot, I think, would be allowable and could be argued to be allowable in this analysis.

[Veronica]

Great. And what about shelving removal and painting an office so that an employee can move into it?

[Jon]

Yeah, I think that would probably fall under rearrangement and alteration, as well as the cost of essentially getting that office ready. Again, keeping in mind you're really thinking about, is this something that's going to permanently increase the value or improve this property? Doesn't sound like that would be the case with regard to that situation. Again, a lot of these are also very factual, factually specific. And so this is the type of back and forth analysis to go through when you're thinking about this.

[Veronica]

Okay, one more, which has come out twice now, which is, adding a ramp to the building for accessibility purposes, to allow wheelchairs to be able to access the property.

[Jon]

Yeah, I think that would be, that would be an allowable cost as well. I think that's the type of, you know, maybe rearrangement, alteration cost that, that is necessary to make, not really making a permanent, permanent increase in the value of the property by doing so.

[Veronica]

Yeah, and I'll add one thing too—that in the Uniform Guidance, there is this discussion of capitalization of the cost as a way to distinguish between an ordinary maintenance and repair cost, versus a cost that permanently improves a building. And so if you talk to your accountant, and talk about whether or not the cost that you would be incurring for that facility would be a cost that would be capitalized? And thus, you know, ultimately be factored into the depreciation of the building? That tends to, from the Uniform Guidance and IRS's perspective, look more like a permanent improvement, as opposed to maintenance and repair costs that you would not typically capitalize.

[Allison Ma'luf, CAPLAW]

And, Veronica, I'll just add to that, that, you know, the repair and maintenance, specific item of cost is one that is in the Uniform Guidance, as you've noted. And so, it's generally applicable to your other funding sources, as well. So generally, that's a cost that your funders expect will happen, because you're using your building to support their programs. And so, they expect that there might be some repair, maintenance that needs to be done in order to continue providing the services that you provide. So, it is a generally recognized cost, that unless there is some specific prohibition against repair and maintenance in a particular funding source, generally, you can engage in those activities.

[Jon]

Thank you, Allison. Thank you, Veronica. Great questions and some great points there to take with you. And again, there's the resource if you want more information on this particular cost.

Moving on to another CSBG Act cost limitation. This one relates to match and whether or not CSBG funds can be used as a match for other federal programs. In general, the answer is no, CSBG funds may not be used as a match for other federal programs. That tends to only be allowed—or, not tends—that's only

allowed if it's explicitly allowed by a particular statute. The CSBG statute doesn't, it doesn't specify that CSBG funds can be used as a match for other programs. And so, you cannot use it, in general, as a match for other programs because it's silent. Those other programs may have, or may contain, language in their authorizing statute that that says you can use other federal funding sources as a match for our programs. The two examples we see, where the statutes for those programs have made that particular allowance, are AmeriCorps, as well as the HUD McKinney-Vento Homeless Assistance Program. The authorizing statutes say you can use federal funds as a match for our programs. And because it's not explicitly prevented, prohibited by the CSBG Act, you can use CSBG funds for those purposes. And so those are really the specific programs for which CSBG funds can be used as a match. And OCS has backed it up with those two Information Memorandum here. And so, the guidance is there, which, which also states that. But otherwise, unless that's the case, unless explicitly stated in the statute, you cannot use CSBG as a match. And in addition to that, the Uniform Guidance, and we'll talk about this a little bit later as well, includes a regulation that essentially says that same thing: federal funds may be used as a match only if it's explicitly stated or allowed in the funding source statute.

Moving on to the next CSBG cost limitation prohibition that we see, this one relates to political activity. The overview of this one is, you can't use your CSBG funds in any way that identifies that use with partisan and nonpartisan political activities, voter registration, and transportation to the polls. I wanted to highlight a couple things here. It's a pretty broad prohibition on the use of CSBG funds with regard to political activity. Note that it's not just, you can't use our funds to pay for these types of political activities by the CAA. It's also, you can't use them in any type of way that identifies such use with these activities, and so CAAs need to be a little extra cautious there with regard to when they're engaging in things like voter registration or something like that, or something that might be allowable with another funding source or with unrestricted funds. Some activity they want to do, please be sure that you're not doing it in such a way that identifies that use with the CSBG funds. You're not using, let's say, CSBG staff to do things or staff different events, maybe CSBG-funded facilities, or if CSBG-funded vehicles or something like that, are not being used to conduct these types of activities. It's a pretty fact intensive analysis when you're thinking about that, because you're thinking about, well, what does it mean to identify CSBG with these various activities. And so just wanted to urge caution there and to encourage you to think carefully when thinking about engaging those types of activities.

There are also Hatch Act prohibitions. And these are prohibitions that really apply to CAA employees, they apply because the CSBG Act, as well as the Head Start Act, I should say, apply them to certain employees at the actual agencies. And essentially for a private CAA, if you work...if you're an employee and you work in connection with, or if you work principally for the CAA and you work in connection with CSBG or Head Start, then the Hatch Act would apply to you. The Hatch Act prohibits employees from using their official authority or influence to affect the result of an election or nomination for office and prohibits those employees from advising, commanding, or coercing other Hatched employees, either directly or indirectly, to make political campaign contributions. Those are two of the applicable Hatch Act prohibitions. The main one we get questions about is really a third one. And this relates to Hatched, quote unquote, "Hatched" employees, who are 100%--for nonprofit, private CAAs--100% paid out of CSBG and or Head Start funds, they can run in an election for a partisan political office. And so that's the question we get a lot. Keep in mind, it is exactly 100% of funding for those employees, if you let's say are paid 99%, from CSBG, from Head Start and 1% from let's say, unrestricted funds, then you would be able to run in a partisan election for public office. So keep that in mind, as well. Just one other caveat for public CAA employees. That's essentially if a public CAA employee works in connection with any federal grant or loan, then they are essentially Hatched and subject to these requirements as well.

Next issue I want to talk about real quickly relates to carryover of CSBG funds. And so many of you may be familiar with this. If you're not, CAPLAW has another Q&A on the issue of carryover. Essentially, regular fiscal appropriations acts in recent years have permitted CAAs to carry over any unused CSBG funding into the next fiscal year for use in that year. And so that's included or been included each year in the Appropriations Act, which is very important because the CSBG Act itself actually only permits CAAs to carry over up to 20% of unused CSBG funds from the fiscal year. And so, based on the law, the laws of precedence and what takes precedent over the other, the Appropriations Act actually takes precedence over the federal CSBG Act in this instance, and so CAAs are not subject to that 20% limitation of carryover. So important to keep in mind that as well.

Another thing to keep in mind with regard to this, you know, if you're a CAA and you have carryover and your state perhaps is not allowing you or not permitting you to carry over, then that really needs to be thought of in with regard to an actual effective reduction of CAA's proportional share, given the allowability of carryover in this regard. And so, there's a whole host of factors to think about with regard to that particular issue. And that will be discussed and talked about in a later webinar. So hopefully, if that's an issue of concern, that entices you to pay attention to that webinar in a week or two.

So I mentioned it a few times and Veronica mentioned it at the outset, I want to talk about now the Uniform Guidance. If you've contacted CAPLAW at anytime with a question about uses of funds. Chances are we've referenced some provision of the Uniform Guidance. And the Uniform Guidance stands for the Uniform Administrative Requirements, Cost Principles and Audit Requirements. Essentially, these are formally a set of Office of Management and Budget circulars that were codified into the regulations, into the federal regulations as the Uniform Guidance around 2014. And essentially, the aim was to create a uniform, quote, uniform set of regulations for the administration of federal awards, including things like cost principles and audit requirements. I put uniform in quotes, because we say uniform, however, there, there could be different versions of this. Many federal awarding agencies have codified different versions of the Uniform Guidance. They are very similar if they've codified different versions, but might have different takes on a few points. In addition to that, you know, you see the reference here to 45 CFR Part 75. This is the HHS codification of the Uniform Guidance. I think, earlier in the presentation, we had left in some citations to the 2 CFR Part 200, which is a general version of the Uniform Guidance. But for purposes of CSBG, let's say also Head Start as well, which comes through HHS, then these are things to think about when you're thinking about this particular kind of a codification. So here's where you find it. Here's the citation.

A couple of points with regard to CSBG funding. Not all sub parts of the Uniform Guidance are going to automatically apply to CSBG funding. That is because as we know, CSBG is a block grant, states have flexibility with which to administer it. And within the Uniform Guidance, it essentially talks about the various parts of the Uniform Guidance that apply to different types of block grants. So for purposes of CSBG, on its face, the Uniform Guidance subpart C, and Subpart D, only a few of these provisions in these two sub parts are going to apply to CSBG. There they are the provisions on public notice sub recipient and contractor determinations, pass through entities, and fixed amount sub awards. That's not to say they can't be applied in other ways. Some agreements with states, some states will apply all the Uniform Guidance as a result of receiving the funding, some grant agreements will apply them, so be sure you check those. But just based on the Uniform Guidance alone, these won't apply. However, the cost principles will apply to CSBG. In particular, because the federal CSBG Act essentially states that the cost principles apply to this type of funding.

So with regard to the Uniform Guidance, we're talking about basic cost considerations here. When you have a cost at your agencies, what are you thinking about what needs to happen? What does it need to

meet in order to be allowable? Well, these are some basic cost considerations, considerations contained in the Uniform Guidance, cost principles, essentially factors that are affecting the allowability of costs. You see the citation there, they have to be necessary and reasonable, necessary to the to the award. Reasonable, when we talk about reasonable the subsequent section of the Uniform Guidance, 75.404 actually talks about what it means to be reasonable. These are things like, incurred by, you know, those types of costs that would be incurred by a prudent person, under like circumstances. They're ordinary and necessary for the awards. A result of sound business practices. For example, you're looking at things like market price for particular items, for items of comparable goods. And in really keeping with established priorities, policies regarding your agency's costs incurred is really how reasonableness is going to be gauged.

In addition, they need to be allocable. Allocable also is talked about in a little more detail in the Uniform Guidance, Part 75.405. And so these are costs that to be allocable have to be incurred specifically for the award, specifically for CSBG, benefits the award and the other work of the entity, and necessary to the overall operation of the entity, and assignable as a result. And so that's what it means to be allocable to the award. Costs also have to conform with limitations of the Uniform Guidance or the federal award. You have to be aware of those various limitations. Limitations of the Uniform Guidance And we'll talk about this a little, in a slide or two, I want to go through some costs, there are some specific cost items there to, to analyze. And so these costs have factors, the factors that affect allowability of costs have to conform to those. Be consistent with organizational policies that apply to federal and non federal activities, you have to treat them consistently as direct or indirect. And we'll talk a little bit about direct versus indirect later in the presentation. But you essentially can't treat a cost as direct under one award and then under another word, treat it as indirect.

You can also, as we talked about before, not include it as a cost or match for any other federally funded program. Again, we talked about that we received a request question about match. I think the question was, can the value of CSBG funded case management services be used as in kind match for other federal grant awards? That's this factor? Essentially, no, this is one of the principles of cost allowability, under the Uniform Guidance is that the same cost is not used as a match for other federally funded programs. You have to document them, and then you have to make sure that they incurred during the approved budget period. So your costs that you incur under an award have to essentially benefit that award during the budget period of that award. And so there's been, CAPLAW came out with an article a month or two ago, that really highlighted the importance of making sure that costs incurred during a budget period, benefit that particular award. And so very important there as well to keep in mind these issues of timing.

As I mentioned, there are also some considerations for selected items of costs. So in the cost principles, you will see some specific selected items that have been included, that CAAs can take a look at to see if the particular item of cost is allowable or unallowable. Those costs apply to both direct and indirect costs. So keep that in mind, it doesn't necessarily matter if they're direct or indirect, when you're checking on the allowability of them.

In addition, the failure to mention a particular cost does not imply that is allowable or unallowable. You know, the people who drafted the Uniform Guidance couldn't essentially include everything in there that might possibly come up as a cost for an entity. And so it doesn't necessarily imply anything if that's not included. Consider that when you're looking at something that's not in there, analyzing it based on perhaps a similar item that you see in the in the cost principles when you're thinking about whether it's allowable. If there is a discrepancy between the Uniform Guidance, 45 CFR Part 75, and the provisions of specific federal award, then the award will actually govern, it will take precedence over that as well. So important to keep that in mind.

We wanted to talk through a couple examples of this of specific items of cost that you may see in the Uniform Guidance. One thing that we received a number of questions about, some inquiries about in recent years, I would say is incentive pay. So that's really the first example we've included here. Incentive pay is included in the Uniform Guidance. It's essentially a temporary discretionary increase in pay, think about bonuses, there is the citation to where that may be in in the Uniform Guidance. The Uniform Guidance says incentive compensation to employees based on cost reduction, or insufficient performance, suggestion, awards, safety awards, etc, is allowable if the following conditions are met: the total compensation is reasonable; and it's paid pursuant to a written agreement in place before the services were rendered.

So there are a few key pieces there, incentive compensation really should be tied to something that's essentially, you know, an attainable goal. So an employee is working towards something and say, let's, let's say there's a way to measure cost reduction, or efficient performance, or safety awards, for example. And your agency says if you have this particular safety rating, after this particular period of time, we will give you a bonus of this amount. If that amount is reasonable, if that was in writing prior to the services being rendered, then that is arguably an allowable incentive compensation cost to your organization.

When you're thinking as an agency about this when you're thinking about a written policy to put in place, as the previous slide and the Uniform Guidance mention, it has to be in writing prior to earning particular incentive. You want to think about the purpose and make a connection to the Uniform Guidance purposes. Again, think about those things in bold: cost reduction, efficient performance, safety, etc. So make a make a connection to that, in your written policy, have criteria for getting there. Make sure it's objective and realistic, and really linked to CAA's accomplishment of its exempt purpose; link it to your CAA's charitable purpose, essentially. And make it objective and realistic meaning, don't make it so that somebody may say, well, why did this person get this bonus, and why didn't I get this bonus or this incentive? You want to be able to point to something concrete to say, well, based on these objective criteria, this person met this incentive and you did not, essentially is what that's looking for. Again, make it reasonable, don't make it completely outside the scope of what, how these incentives and bonuses tend to look at let's say like, likely situated organizations.

And then think about putting some safeguards in place, maybe put a cap on the total incentive compensation, give the board some discretion as well to cancel or reduce awards. Let's say the agency is running out of money, then it might not be prudent or, or good to be giving incentives, and using up the last of, let's say, various program funds.

So with regard to another step in the in the framework and the analysis for looking at, you know, the use of CSBG funds that was presented at the beginning, just a quick slide here on state CSBG rules and guidance. As we've mentioned, CSBG is a block grant, the primary administrators of CSBG funding will be the states. And so they have a lot of discretion, essentially, to interpret the Act and the Uniform Guidance in that administration of the funding. HHS has recognized, does recognize different states may take different interpretations. I'm sure many of you here know that, understand that. But just be aware, they may look at the statutory provision and say, well, this means this, while another state may take a different approach to that issue. And there is that level of flexibility under the CSBG Act given that it's a block grant. The HHS will typically defer to the state's interpretation unless it's clearly erroneous. The citation you see there 45 CFR 96.50(e) is from regulations related to block grant funding, federal block grant funding. So be aware that those exist. I think Veronica mentioned that at the beginning, as well as another source of regulations to be aware of with regard to CSBG, state CSBG, statutes, regulations guidance. Many states have their own state CSBG statutes for how the funding is administered, you know, and how agencies get

that funding and requirements related to them. So be aware those may be in place as well, that set various regulations, set perhaps administrative cost limits for CSBG. And so within that administration, those could be additional terms and conditions in grant agreements. As I think I mentioned earlier, the state can, let's say require compliance with all the Uniform Guidance provisions in something like a grant agreement, and have done that in various places as well. So be sure that you're reading those, as well and know what's contained in them. I think I'll stop there. I'm sure there have been questions about what I just mentioned. But let me just take a look.

[Veronica]

Yes, yeah, we've gotten questions, Jon, I think what we might try to do just in the interest of time is move through the rest of the presentation, and try to address some of the questions that we've gotten in the chat at the end. So thank you to those who have put questions in the chat. Please keep them coming. We're writing those down. And then if your question is not ultimately answered on this webinar, please also feel free to submit that to us as a consultation question.

So we've now gotten to step five of the framework. Now this is the step where I said at the very beginning, you've worked through all the steps one through four, and you still don't have an answer. And you're wondering, what was the purpose of this presentation? And so you get to step five, which is really this kind of question of what arguments can you make to support charging this cost to CSBG? And this is where we get into a couple of different types of questions that we see frequently around uses of CSBG funds. Those types of questions are, is this a CSBG program cost or is it an administrative cost of our agency? That's one type of question that we see. How much of it can I allocate to CSBG? Versus do I need to allocate it to other programs and services? That's part of that first question of, is this a direct program cost of CSBG? Or is it an administrative cost that should be allocated across all of the functions of the organization and all the funding sources of the organization.

One other area that we see questions around this are differences between operational costs for the organization, and client costs that the agency this community action agency wants to support. And we saw that kind of distinction when we were talking about gift cards, at the very end of the CARES CSBG funding, gift cards for clients, gift cards for employees and staff. And there are differences in how those costs might be treated. So this section is about kind of arm you with arguments to make to your state about why a cost is applicable to CSBG. And the important thing to note here is that we are focusing on IM 37, which, as we said at the outset, Information Memorandum items are non-binding guidance. They're non-binding guidance, because of the nature of a block grant, as the federal funding source. OCS does not have the primary, they're not the primary, you know, interpreter of the federal CSBG statute if the state has taken an interpretation that does not conflict with the federal statute, and so the guidance that OCS issues is intended to help states think through how CAAs would think about that issue, but ultimately defer to the state for their interpretation of the act.

However, even though they're non-binding, they're very useful. And again, we see that, you know, states, OCS as well, as, you know, the DAB the departmental appeals board, which is the part of the Department of Health and Human Services that, you know, evaluates cost disallowances that have been appealed to the DAB, they look at guidance from federal funding sources. And so IM 37 is important, it's long, and we'll be talking about how it works in this section. So IM 37 stresses that CSBG is very different from other funding sources in that it does not support a particular stand alone program. Sorry, Jon, if you go back one more slide. So unlike VITA, or unlike, you know, Foster Grandparents or Head Start, it does not support a particular service. A lot of flexibility is involved in CSBG. Funding and agencies, again, are going to their community needs assessment and their community action plan to inform how they want to spend their

CSBG funding. And so in IM 37, on the next slide, you see that CSBG can support the creation of new programs and services. So it can support a particular program. If the Community Action Agencies decides that, you know, that's the need in their communities, we need another a new type of program that is not supported by any other funding that we receive, and it chooses to spend its money on CSBG funding on that program. It can also augment or add to existing programs and services, that means that you've got services and that you already receive funding for other funding, either federal funding, or private funding, or state funding. And you'd think that it would benefit your community to augment or increase the capacity of those services. In that case, you can use CSBG funding to support the addition to those existing programs and services. And then lastly, IM 37 identifies that CSBG can be used to coordinate amongst those different programs, essentially give your organization increased organizational infrastructure, organizational capacity to coordinate and enhance the various programs that you operate. This bucket of costs is where we tend to see that kind of blending of you know, is it an administrative cost? Or is it a CSBG direct program costs, because when we think about organizational infrastructure and organizational capacity, generally, we have been conditioned to think about these costs as administrative costs under the Uniform Guidance.

So that's where there's a lot of gray and whether or not that cost is truly a CSBG costs versus an administrative, you know, general indirect cost that needs to be allocated across all of the different funding sources of your agency. So let's walk through each of these types of costs in more detail. On the next slide. We'll see that IM 37 provides some examples of what linking and coordinating multiple programs might look like. And so that is, when you're thinking about using CSBG to support different programs, existing programs at your agency. You're thinking how is the addition of CSBG funding here going to help these other various programs work more effectively with one another? As a client who's coming to the agency, how is it going to allow them to take part in other programs that the agency is running and is offering. And so IM 37 talks about making more effective use of other anti-poverty programs supporting and coordinating a service delivery system serving low-income people. This is where we see CSBG being used for intake referrals. Ensuring that a client who comes to one program with a need is able to benefit from other programs and services that either the agency offers or other third-party organizations in your community might offer. And so CSBG can support that type of connecting a client from one program to another, coordinating and establishing linkages between governmental and other programs. So these are partnerships that might help multiple programs at your agency or programs at your agency and at a partner agency work together more effectively to serve the needs of your community. And then that blends into the last one, which is coordinating programs forming partnerships with other community organizations. Where I think folks get confused is that the federal CSBG Act, I'm sorry, yeah, you can go to the next slide, Jon, it requires that HHS submit to Congress, a report on direct and administrative expenditures. So within the funding provided to CSBG, how much of it was spent on direct costs and how much were spent on administrative costs.

Now remember, there is no federal cap that exists on administrative costs for CSBG. The federal act does not say that community action agencies or states are limited to a certain percentage of their funds on administrative costs, different from LIHEAP, for example. However, some states do choose to impose administrative caps on the CSBG funding that it passes along to the eligible entities in that state. And states have the discretion to do that, even if there is no federal cap. So the question is, what are just direct admin CSBG costs and what are administrative, administrative CSBG costs, and IM 37 tries to differentiate between these two types of costs.

This is again a tricky area because it's nuanced. And you're looking at the facts that support a particular item of cost. But IM 37 characterizes direct CSBG program costs as costs that can be identified with the

delivery of a particular activity intended to achieve an objective of the CSBG grant.

I'd like to think about the slide that we had earlier that had the three kind of different buckets of types of costs that CSBG can support. It can support the creation of new programs, augmentation of existing programs, and the organizational infrastructure that is needed to coordinate different programs at your agency. Those that we would call as, these are the purposes of the CSBG Act and cost spent in each of those three buckets can be characterized and reported as direct program costs for CSBG. On the other hand, administrative costs are those that are not readily assignable to a particular program funding stream, and they relate to the general management of the grantee. And IM 37 provides us with some examples of what these might be. These include things like board development, strategic direction of the organization, the executive director, salary, accounting, budgeting, personnel, procurement, legal. These are costs that you typically are allocating across the different programs at your agency. The tricky thing is that some of these costs that might look administrative can actually be characterized as direct program costs.

If you go to the next slide, Jon, actually, I want to go to one more, and then we'll come back to this one. Sorry, one more, there's a list of costs that have administrative qualities. Now, here is a list of costs that can look administrative, for example, salaries and benefits of programs, staff and manager, equipment, training, conferences, travel and contracts. And IM 37 says that some of these costs even though they look administrative in function, can be treated as CSPG direct costs, if they support again, the CSBG kind of functions which I go back to the slide that has the three different categories of purposes and goals, which are creating new programs, augmenting existing programs and then developing the organizational infrastructure to coordinate those programs. So if you just click one more here, Jon, I think, so so long as that cost is not related to the general administration of the community action agency. So that is to say, you're not just charging all of the costs of the accounting staff to CSBG. You're not just charging all of the costs of the HR staff to CSBG. Because you need HR, you need accounting, you need legal, you need it to carry out the general functions of the organization.

Now, if you have a staff member whose job it is to coordinate multiple programs at your agency, so they're looking at CSBG funded services, but they're looking at Head Start, they're looking at weatherization, LIHEAP, and their job is to ensure that clients can make use of all of the different programs at your agency, we would argue that that type of cost is precisely the type of class that CSBG is intended to support, because that's the kind of coordinating and linking cost. That is the purpose of CSBG and is what's so valuable about CSBG to an organization. And so in that case, the salary of that staff person spent coordinating amongst those different programs can be charged completely to CSBG. Because that function of that person is a coordinating function.

So now to go back to the slides, where we talk about what coordinating and strengthening means. So coordinating and strengthening activities, you can see here a list of what IM 37 provides. I'm not going to read all of these categories. But the idea, again, is helping multiple programs talk to one another, leveraging the different programs so that a client can benefit from multiple programs at the agency. The next slide has, so here's a specific list of costs that you can charge as program costs, direct costs, not administrative costs, because they play that coordinating and strengthening function. So you can see strategic planning across multiple agencies, community wide needs assessments, making sure that you have different services located in the same building, computerization of common intake and referral systems. So we think that there are parts of website functions that can be charged to CSBG as a program costs when it is playing that role. And so the question to ask is always, what is the role that this cost is playing? And can I make an argument that it is playing a coordinating and strengthening amongst multiple programs function such that we can see this as a CSPG program cost?

So what happens oftentimes is you read IM 37. And that makes sense. But then you go to the Uniform Guidance, and you read what their definition of an indirect cost means. And it says costs incurred for a common or joint purpose benefiting more than one cost objective. And you think, wait, some of those costs that I was just thinking about the coordinating and strengthening costs and Uniform Guidance treats that as an indirect cost. So which is it? Is it an indirect cost? Or is it a CSBG program cost? IM 37 talks about that as well. So in the next slide, you see that IM 37 says some costs that the Uniform Guidance considers to be an indirect cost or an administrative costs because it benefits more than one program actually should be treated as direct for CSBG, it should be allocated to CSBG.

Again, because the function of that cost is that coordinating and strengthening function, that that's what CSBG is all about. And if that's what CSBG is all about, then we should be able to treat that type of cost as a direct cost for CSBG and allocate that cost to CSBG, rather than amongst the different functions. Now when I say that it can feel really easy, in theory, to understand; the devil is going to be in the details because you get a cost in hand and your, you know, your program staff come to you and say, well, what about you know, this training costs that I've got here? Or what about this website costs that I've got here? Or what about this facilities costs that I've got here?

Again, the question to ask is what is the function of that cost? And can I make an argument that the function of that cost is to support coordinating and strengthening? Know that IM 37 says that you cannot cost shift, right? There's a standard prohibition, that all of us who work with federal grants know is that the Uniform Guidance says you cannot shift costs that should be allocated to one program to another program. So how does that fit into all of this as well? And the way that we think about it, and what IM 37 talks about is you can always augment the services that are provided under that other program, you can provide more of those services using CSBG funds and charge those costs to CSBG funds. You can go above and beyond what that other funding source provided for that program. But you cannot shift as in, you cannot take costs that should have been charged to that program in that grant year, because you were required to provide that service, you cannot now take that cost and charge it to CSBG. So you can spend those dollars for that other program on something else. Instead, the CSBG kind of part of that program should be augmenting the service, adding to the service delivering it to either maybe a segment of the population that was not envisioned to be served by that program. But, you know, this client still meets the CSBG eligibility, income eligibility criteria, or you're doing something innovative, you're trying to develop a new way of providing that service and you're using CSBG to support that type of innovative effort.

Okay, I want to land here on these last few slides, which is to talk about allocation. So the rules for allocation for to CSBG. How does that you know, what applies here. And what you want to remember is that CSBG can play these coordinating and strengthening efforts, it can play this augmenting existing services or creating new programs. However, if you have general administrative functions to it, the HR, the accounting, the ED function, the board functions, those costs still have to meet the Uniform Guidance requirements that you allocate costs according to the benefit received for that program. So just because you have this flexibility to have CSBG played as you know, coordinating and strengthening or augmenting function or creating new programs function, doesn't just mean that you can treat CSBG as, you know, your bucket of funds that you spend, that you charge all your administrative costs to or that you spend when you don't have enough cost to cover the other programs.

The principles for cost allocation still apply under the Uniform Guidance. And here, just really briefly, you know, the Uniform Guidance talks about direct costs and indirect cost and that there's no universal rule for classifying one as the other. But the point is that you should treat costs that are incurred for the same purpose in similar situations consistently as either direct or indirect. That means that you really shouldn't

be treating the same type of costs as direct in one funding source and indirect for another funding source. Unless I would say you can, you know, show why that particular cost meets those CSBG coordinating and strengthening, augmenting and creation of new programs, functions that we talked about. So here you can see just the way that the Uniform Guidance envisions direct and indirect costs. And on the next slide, you can see the different options for recovering indirect costs. So if you have a cost that is considered indirect, there are different ways of recovering that cost, you can have a federally negotiated indirect cost rate, if you have a direct funding source from the federal government, you can charge the 10% de minimis rate, which is 10% of your modified total direct cost. Or you can cost allocate by using a direct cost allocation plan. You know, we talk about these types of cost recovery options in much greater depth in other types of webinars. But that's not the purpose of today's webinar, we just wanted to show that the Uniform Guidance is principles for cost allocation does apply still to CSBG.

[Jon]

So I'm going to take over really quick and talk a little bit, close out really with some tips for advocating for cost allowability. And so this is essentially, you've gone through the analysis, you're talking about a particular cost that you want to charge to CSBG. What do you need to do to really advocate for that cost?

Well, number one, show why the cost is not prohibited. And this really goes along with what we have been discussing with the framework that we presented, is you're showing under the applicable legal requirements under let's say, the Federal CSBG Act, the Uniform Guidance, any state any state specific rules that may apply. There's no real prohibition in the way that you'd like to use those funds. And so you're showing why that's the case, you're showing why a restriction is not applicable, but silent in a particular law or regulation to your intended cost. And so thinking about it that way.

In addition to that, I mentioned this earlier, draw parallels between the cost that you want to charge and other costs that may be explicitly permitted under legal requirements. And so think about drawing parallels between a cost that your agency wants to charge in, let's say those Uniform Guidance, specific cost items that are included in the cost principles. How does the particular cost relate to something that is allowable under those principles? And really trying to make that argument and draw those parallels between the two.

And then thirdly, think about showing how the cost is applicable to CSBG. And Veronica just talked about ways in which to do that with regard to IM 37. The presentation really started out with thinking about the purposes and goals of the federal CSBG Act. And so how is the particular cost that you're incurring, or that you'd like to charge to CSBG, furthering those purposes, furthering those goals of reducing poverty revitalizing the community, and how you're going to make that argument for doing so? So those are three tips in general for advocating for cost allowability.

We wanted to present a few questions as well of specific items of cost that that you may have heard or you may have questions about. We received a lot of questions about a lot of these. And so gift cards in particular was one we received a lot of questions about in the fall. This was in regards to CARES CSBG funding. But with regard to CSBG funding, in general, what would you say, to the issue of gift cards, and whether that was allowable? You know, I think you're gonna have to think about the particular gift cards involved, you know, what your agency wants to provide, as a result of a particular CSBG program in gift cards to recipients. You, of course, want to make sure your recipients are income-eligible, and that they're going to be using those gift cards in a way that benefits the CSBG goals and purposes. And so a couple things to think about here would be what is the gift card for, how are you going to verify that any recipients are using it for a purpose that relates to CSBG. And so let's say there's a particular need, gas prices are through the roof, and there's a need in the community, let's say, for gift cards for gas, you can make

that argument as an organization, and then you're buying specific gas cards to give to income-eligible individuals. And so arguably, you can make that argument that it would be within the scope of those purposes of the CSBG Act. In addition to that, you want to make sure that you're thinking about income eligibility and how that might impact income eligibility. For recipients, sometimes gift cards are seen as sort of similar to cash assistance in that respect. So another consideration there.

And that sort of goes into cash assistance, as well, with regard to cash assistance. There are provisions in the federal CSBG Act that talk about emergency situations, and the CSBG Act and CSBG funds being used to meet the immediate needs of the community. And so we've seen cash assistance used in those circumstances, cash assistance to income-eligible individuals has been allowable in circumstances or are written about as allowable in those circumstances. And so that has been seen with regard to the CSBG Act, at least, to be allowable in emergencies. It's arguable whether or not that can be allowable, I think, not in emergencies as well, if you're devising a program to provide cash assistance to income eligible individuals. And there are ways in your providing for ways to verify that, you know, here's what this assistance would be used for, here's how it would meet the goals of the federal CSBG Act as well.

Rental Assistance, something, you know, we talked about, you would look maybe to the Uniform Guidance to see well, our rental costs tend to be an allowable cost and in the, in the cost principles could draw parallels to that there to see if rental assistance would probably be allowable.

And then mortgage assistance was something you know that you may think, well, mortgage assistance is that related to sort of the restrictions on buildings and facilities, payments that we talked about earlier in the CSBG Act, that particular limitation. We have actually received recent guidance from OCS, that talks about mortgage assistance, if it is provided as part of a program to income-eligible individuals would be an allowable cost to make. I know we're short on time, so I'm not really going into in-depth analysis on each of those. But hopefully that gives you a sense of the types of considerations that could be made and what you might be looking for when looking into those types of things as well. Looks like we are exactly at time.

[Allison]

It was, so it was a lot that, it's really great. And I'm glad everyone sort of stayed with us. I'm just real quickly, you can see the final side is our resource library, a lot of what we've talked about today, we do have some great resources on it. So please spend some time in there, use those filters, and then give us feedback, we will be sending out some surveys about our library. And we want to know what you guys think and how we can improve it so that you can find the information you need. We do have two more webinars in our series, January 24, next Tuesday, Mechanics of CSBG, and January 31, we're going to talk about monitoring of community action agencies and the steps that could lead to termination and what that process looks like. And that's in the fun, all that fun, good stuff, save that for the end.

There were a lot of great questions in the chat box. So we'd really love to talk about those questions with you individually. So please feel free to email us directly. Caplawinfo@caplaw.org.

So someone was asking about just I'll take one quick question about cash assistance versus rental assistance, mortgage assistance, and those other types of assistance. So mortgage assistance and rental assistance is a form of cash assistance. When we're talking about cash assistance, we're talking really about just giving people dollars with with no parameters associated with those dollars and saying, here's like a basic income for you to take and use as you need to use it. And so that's there are some CAAs, agencies who are looking at doing universal basic income programs. And there's some pilots out there a lot of good information, you know, a lot of this comes down to what kind of accountability do we have

with respect to that funding? How do we measure outcomes. So there's a lot of sort of framework that that people are working on to get that kind of stuff in place. So we can sort of assess the impact of that. Some early studies have shown that, that those programs can be successful.

With respect to mortgage assistance, it was pretty clear at the end of the pandemic, at the end of last fiscal year, that OCS was on board. There is a great IM out there with respect to mortgage assistance and talking about sort of the processes that you would work with your state to put in place so that you can facilitate those kinds of programs.

With gift cards, we have found, and we found this throughout the pandemic, that the real issue with gift cards has to do with your agency making sure you set them up properly on the back end. So there's not any kind of misuse or abuse of those. So you're accounting for them on the back end. I saw there was a comment there that one state wasn't really allowing their subgrantees to use gift cards. As far as CSBG program, they have been very successful and very useful and really helped move, move matters forward with individuals who've received them. So I think, you know, if we can provide you with any information to assist with with kind of helping move that conversation along, we're happy to.

Rental assistance is something that has been provided through CSBG programs for many years, that's not new. I'm happy also to discuss that more as we go along. There are frameworks that need to be put in place to kind of assist with the facilitation of these programs. So with that, I just sort of jumped in, these two have really been going at it and I and I've been on the sidelines. So I'll just giving them a little bit of a breather, they, they really slogged through what I think is one of the toughest webinars of this series. So I really appreciate you guys. Sticking with us. I'm gonna just say, Veronica, you have anything else to add or Jon, and, Jon, you have anything else to add with that?

[Jon]

Just to reiterate for questions about anything, if you know, obviously, we didn't get a lot of time for questions, so I'm happy to answer those. You know, one on one.

[Allison]

Absolutely. Absolutely. Thank you, everybody. And we see that there's a real need for this information. So we'll think about ways to keep having these conversations.

[Veronica]

Thank you everyone. Have a great day.

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