



# 200 Series

Community Services Policy Manual



# 200 SERIES GENERAL POLICY

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## 200 SERIES GENERAL POLICY

### 200 EMERGENCY POLICY DURING CORONAVIRUS PANDEMIC

**EFFECTIVE DATE**

**MARCH 24, 2020**

#### **PURPOSE**

These policy item changes will be in effect during the Coronavirus (COVID-19) pandemic. These changes will overwrite original policy items. They remain in effect until BCAEO states otherwise. This policy may change suddenly and often as more information becomes available.

#### **POLICY CHANGES**

New Policy

#### **POLICY**

Governor Whitmer, in an effort to protect all Michiganders, signed [Executive Order 2020-21](#) March 23, 2020 that directs residents to remain at home or in their place of residence to the maximum extent feasible. A summary of her, "Stay Home, Stay Safe," Executive Order is available online.

Community Action Agencies (CAAs) are identified as essential critical infrastructure workers, as required by the Community Services Block Grant (CSBG) Act in providing emergency services, housing, nutrition, healthcare, transportation, and other anti-poverty programs to low-income individuals and families.

In addition, the Governor's Executive Order 2020-21, section 8, identifies several areas of essential critical infrastructure workers. CAAs are defined within the category of Health Care and Public Health, which states essential critical infrastructure workers are "workers who support food, shelter, and social services, and other necessities of life for economically disadvantaged or otherwise needy individuals, such as those residing in shelters".

As such, CAAs are classified as essential critical infrastructure workers during the State of Michigan COVID-19 pandemic. Your agency is instructed to adhere to the following guidance while maintaining emergency services to low-income individuals and families.

- Employers should explore whether they can establish policies and practices, such as flexible worksites (e.g., telecommuting, remote workstations) and flexible work hours (e.g., staggered shifts), to reduce the amount of staff in the business site and to increase the physical distance among employees and between employees to ensure social distancing strategies are followed.
- Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol.

<sup>1</sup> For the purposes of this order, critical infrastructures workers are those workers described by the Director of U.S. Cybersecurity and Infrastructure Security Agency in his [guidance](#) of March 19, 2020.

- Encourage workers to stay home if they are sick.
- Encourage respiratory etiquette, including covering coughs and sneezes.
- Provide customers and the public with tissues and trash receptacles.
- Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.

### BOARD ISSUES

CSPM 209 & 210

#### IMPORTANT UPDATES

##### E-Meetings

During the Coronavirus Pandemic, agencies can hold virtual board meetings through conference calls or webinars regardless of inclusion in their articles or bylaws. Quorums will be determined by who is on the conference call.

Board meeting minutes should note if the meeting was held virtually.

##### Board Vacancies

During the Coronavirus Pandemic, Board vacancies must be filled within 180 days. Agencies should make every effort to fill a vacancy as soon as possible.

### ASSET TESTING

#### IMPORTANT UPDATES

During the Coronavirus Pandemic, Asset Testing is waived for all BCAEO-funded programs.

### APPLICANT SIGNATURES/NOTARY SIGNATURES/GM APPROVAL

CSPM 502, 508, 601, 612, 701, 909

#### IMPORTANT UPDATE

During the Coronavirus Pandemic and mandatory social distancing, the following practices can be used to temporarily substitute as client approval until the client signature can be obtained in person:

##### **Grant Manager Approval for Zero Income**

- **Grant Manger approvals are temporarily waived for zero income self-declarations.**

##### **Notary Signatures**

- All required notary signatures are temporarily waived.

## **Client Signatures**

- Video chatting (FaceTime, Skype, etc.) can be used to obtain client approval. This can be achieved by the client holding picture identification to the camera and the intake specialist taking a screen shot to show they spoke with the client and the text message portion of the media app will be used for the client to document and state their approval. This text message portion could then be printed/saved along with the screen shot of the photo ID to keep on file as temporary client approval.
- The Community Action Agency (CAA) can email the client a scan of the document to sign. The client can then print the document, sign it, place their photo ID next to the signature line and take a picture of the signed document (with photo ID included in the photo) and send the photo back to the CAA in a text or email. If the client does not have access to a printer then they can reply to the email from the CAA and attach a picture of their photo ID to that email while stating their approval in the email.
- If the above options are not available to the client, they can use voicemail by either:
  - Calling the CAA main line and leaving a voice message stating their name (along with a client PIN, file number, etc.) and their approval of the information obtained by the CAA during the intake process on X month and X date.
  - Calling a cell phone and leaving a voicemail message. The text version of this voice mail would be retained to document temporary approval. The information contained in a) above should be included in this voicemail.
- The CAA could mail the form(s) to the client for approval, the client could then sign and mail them back to the CAA. However, unless the client includes a notary approval with their signature this method will only be used as temporary approval.
- If the agency has electronic signature software, that is allowable.
- If none of the above methods will work for the CAA to obtain necessary client approval for intake (client only has access to a land line, etc.), then the intake specialist can document their phone conversation with the client stating the date, start and end time of the discussion, client, and general description of what was discussed, and the client gave verbal approval of this information. The COVID-19 HMIS Oral Release of Information Phone Script document can be used to document this information. This can be found in [SharePoint](#).

Sufficient reasoning must be documented, and kept with the approval, as to why the specific method of obtaining temporary approval was used. This information must be retained and kept along with the documentation signed in person (when it is obtained) as this will be subject to the normal monitoring procedures and will be used to support the start date for services.



### INCOME ELIGIBILITY

CSPM 502

#### EXCLUDEABLE INCOME

##### IMPORTANT UPDATE

During the Coronavirus Pandemic, the following income can be **excluded** for CSBG income eligibility:

- Unemployment income
- CARES ACT Stimulus check

#### REDETERMINATION

##### IMPORTANT UPDATE

During the Coronavirus Pandemic, redeterminations for eligibility do not have to be completed for clients that have received CSBG services in the past 12 months (1 year).

**Reminder:** Agency may use the income eligibility exception rule where necessary.

#### LOOKBACK PERIOD

##### IMPORTANT UPDATE

During the Coronavirus Pandemic, for **CSBG**, the lookback period for client applications will be changed from three (3) months to thirty (30) days including the application date.

**NOTE:** The lookback period for client income for DOE and LIHEAP WAP has not changed.

### DUE DATE EXTENSIONS

ALL CSPMs included

##### IMPORTANT UPDATE

During the Coronavirus Pandemic, all due dates will be extended by 90 days. This includes, but is not limited to Statement of Expenditures, reports, etc. The exception to this extension is Weatherization Statements of Expenditures and production reporting. Production reports must still follow the normal due date schedule as defined in CSPM 602. If you have a specific question, please contact your grant manager.

### COMMUNITY NEEDS ASSESSMENTS

It is expected that agencies will continue to conduct community needs assessments within the required three-year timeframe. If you run into an issue, please contact your grant manager.

### ORGANIZATIONAL STANDARDS



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It is expected that agencies will continue to follow the Organizational Standards. If you run into an issue, please contact your grant manager.

### **SUPPORT COST CATEGORY**

CSPM 402.2, 402.3

#### **IMPORTANT UPDATE**

The maximum amount for “support” of 35% of the Grantee’s DOE and/or LIHEAP allocation is waived during PY19 due to the face-to-face hiatus. If the hiatus is lifted during PY19 an assessment will be done of current spending to re-assess an appropriate limit, if appropriate.

### **TECHNICAL WAP MONITORING**

CSPM 603

#### **IMPORTANT UPDATE**

During the Coronavirus Pandemic, it is possible that BCAEO Technical Weatherization monitors will not have the opportunity to do an onsite inspection at every agency in PY19. If BCAEO Technical Weatherization monitors are unable to meet the 5% minimum site visit during PY19, they will make up for the deficit in PY20.

### **COMPLETING WEATHERIZATION JOBS**

CSPM 606

#### **IMPORTANT UPDATE**

Grantees must complete the weatherization of a home within 6 months of conducting the energy audit. Jobs that are not completed within 6 months of the energy audit require an additional, up to date, energy audit to be performed. However, the time during the COVID-19 face-to-face hiatus does not count toward the 6 months of a valid energy audit.

### **COMPREHENSIVE WEATHERIZATION TRAINING**

CSPM 618

#### **IMPORTANT UPDATE**

Individuals working in any JTA who had not received Comprehensive training in the past three program years, had to participate in Comprehensive training in PY19. If individuals working in a JTA were unable to participate before the COVID-19 face-to-face hiatus, they will be able to participate in their JTA’s Comprehensive training during PY20.

### **WAP QUEUE MOVEMENT**

CSPM 905



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### **IMPORTANT UPDATE**

Any queue movement that requires face-to-face work with clients has time period restrictions waived during the COVID-19 face-to-face hiatus.

### **WEATHERIZATION INSPECTIONS**

CSPM 905:

### **IMPORTANT UPDATE**

In usual circumstances, approval for contractor payment is based on the job passing QCI. However, the delay of inspections caused by the COVID-19 face-to-face hiatus, could create a substantial delay in contractor payment. For that reason, BCAEO approves Grantees payment of contractors whose work has not passed inspection solely due to the delay in a QCI from the face-to-face hiatus. Grantees should consider the risk associated with the decision to make payment and the potential implication on call backs, for example. Grantees may alternatively consider making a partial payment immediately and pay the remainder owed to the contractor after the inspection is completed.

### **BACKGROUND CHECKS FOR VOLUNTEERS**

**CSBG Contract Language**

### **IMPORTANT UPDATE**

During the Coronavirus Pandemic, agencies will have a high need for volunteers and new staff to address the issues impacting the community. Agencies should follow their own internal policies. An ICHAT check will meet the contractual requirements for background checks of volunteers working directly with clients or having access to client information.