



## National Community Action Partnership Message to the Community Action Network

May 11, 2020

### Guiding Principles for the Community Action Network

#### During COVID-19 Response and Recovery

- 1. Plan and Coordinate Together:** To achieve timely, efficient, and effective delivery of COVID-19 response and recovery efforts, all members of the Community Action Network should coordinate and plan together.
- 2. Maximize Flexibility to Respond Creatively:** Community Action Network members should seek to maximize local flexibility to respond to families' and communities' emerging needs stemming from the immediate crisis and the eventual recovery.
- 3. Protect Customers and Staff:** Protecting the physical health and emotional well-being of customers and staff is critical.
- 4. Deliver Impact:** All members of the Community Action Network have a role to play in delivering impact for individuals, families, and communities and everyone should be committed to delivering, capturing, and highlighting that impact.

*"We care about the entire community, and we are dedicated to helping people help themselves and each other."*

During the novel coronavirus pandemic, people in the Community Action Network have been living the Community Action Promise each day. While our family members, neighbors, and friends are serving as doctors, nurses, and hospital workers on the medical front lines, Community Action professionals are responding on another front. We have heard from many of you about your efforts to problem-solve—shoring up and constructing systems and supports for people of all ages facing all types of food, housing, childcare, and other challenges. Your efforts make a big difference to the social, emotional, and financial well-being of so many individuals and families. We are awestruck at the work you are doing to serve your neighbors.

The COVID-19 pandemic has shined a spotlight on our shared responsibility for the health and well-being of our neighbors. On global, national, state, and local levels we now see we are all in this together. The Community Action Network has a long history of coming together to rapidly and creatively respond to national, state, and local challenges. Whether during the financial crisis of 2008 and subsequent implementation of the American Recovery and Reinvestment Act (ARRA), or recovering from a hurricane, tornado, or wildfire—we are at our best when we work together. When Community Action Agencies (CAAs), state Community Services Block Grant (CSBG) offices, Community Action State Associations, and national partners come together around a shared agenda, incredible results can be achieved.

Stakeholders at every level of the Community Action Network have an important role to play in responding to this unprecedented pandemic. On the state level, CSBG offices' timely release of funding and guidance, effective oversight, and coordination with other state programs strengthens CAAs and positions them to move quickly and respond efficiently and effectively to the needs of their communities. State Community Action Associations serve as critical connectors between the CAAs and other partners, provide essential training and technical assistance, and help CAAs innovate and perform at their best. Together, state CSBG offices and Community Action Associations play an indispensable role in building the capacity of local agencies to respond and perform.

Across the Community Action Network our ability to weather this storm hinges on ensuring that we work closely together, communicate regularly and effectively, and move resources quickly so community action staff on the front lines can function immediately in a rapidly changing environment while planning and preparing for the lengthy rebuilding process that will follow.

### **Federal Coronavirus Response Legislation**

Congress has passed four laws (to date) in response to the novel coronavirus pandemic. The third piece of legislation, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, includes appropriations for CSBG, the Low-Income Home Energy Assistance Program (LIHEAP), Head Start, and critical nutrition and housing needs. Additionally, the CARES Act includes funding for small business loans, Economic Impact Payments for many Americans, and expansion and adjustments to the Unemployment Insurance program. For additional details on the legislation, please review the national partners' websites.

The CARES Act allocates \$2 trillion in federal stimulus funds to combat the crisis. The legislation includes \$339.8 billion for programs that will go to state and local governments. Additionally, \$26 billion is available for food security programs such as school meals, SNAP, and food banks. Many of these programs have specific relevance to CAAs and their customers.

The CARES Act also appropriates an additional \$1 billion for CSBG funding to states using the established allocation formula. Language in the Act allows carry-over into the next two fiscal years, ending September 30, 2022. Additionally, states have authority to increase eligibility for CSBG from 125% to 200% of the Federal Poverty Level (FPL).

### **Office of Community Services CSBG Guidance On COVID-19 Response**

Initial communication on COVID-19 and administration flexibilities can be found on the OCS [Dear Colleague Letter web page](#). On April 13, 2020 the Office of Community Services (OCS) issued [CSBG Information Memorandum \(CSBG-IM-2020-157\)](#) providing initial guidance to states and other CSBG stakeholders on the use of CARES Act CSBG funding. IM 157 addresses a number of key policy areas. On May 8, 2020 OCS issued [CSBG Information Memorandum \(CSBG-IM-2020-158\)](#) providing preliminary information on the CSBG award process and asking states to begin immediate distribution of resources to agencies while also indicating OCS plans to provide additional guidance in subsequent communications.

The Community Action Network is moving forward and taking a number of steps to prepare for the successful deployment of CARES Act funding. As a block grant, much of the planning and successful implementation is in the hands of states and local CAAs working together to best meet the needs of individuals with low incomes and local communities. With this in mind the National Community Action Partnership offers the following guiding principles for members of the Community Action

Network as planning and implementation moves forward in the coming weeks and months. We encourage state CAA Networks to review these principles together and adopt or adapt a set of guiding principles for working together during this unprecedented, unpredictable and sobering time.

### **Guiding Principles Explained**

#### **1. Plan and Coordinate Together: To achieve timely, efficient, and effective delivery of COVID-19 response and recovery efforts, all members of the Community Action Network should coordinate and plan together.**

In many states, CAAs and CSBG offices are working together, drawing on each other's strengths and experience to strategize for the implementation of the CARES Act. These efforts and collaborative problem-solving are essential to enabling the rapid deployment of funds at the local level both to alleviate trauma and suffering and to prevent individuals and families from falling so deeply into poverty that their recovery becomes even more challenging.

The block grant nature of CSBG means states have authority and flexibility to utilize a wide range of policies and practices to administer CSBG. Additionally, CSBG funding can address very different needs even within a single state. Navigating the diversity of needs and tapping into the flexibility and potential of CSBG takes time and planning.

As the Community Action Network in each state convenes to strategize and plan, consider the following actions:

- **Creating or Expanding Community Action Network Communication Channels**

State CSBG offices, Community Action Associations, and CAAs should consider coming together on regular conference calls or web meetings. Communication channels need to be open wide, with all three groups appreciating and respecting each other's expertise, needs, and constraints. Now is the moment to set aside any previous pain points and work together at a new level.

Sharing information and increasing levels of transparency will motivate creative problem-solving and reduce bottlenecks and other difficulties down the road. The experiences of state CSBG officials and CAA leaders who were engaged in implementing the CSBG ARRA funding of 2009 may be helpful in surfacing past best practices and pitfalls to avoid.

Important topics to discuss may include the following:

- **Conditions on the Ground:** Share the conditions the CAAs, state CSBG office, and Community Action Association are observing in their respective roles and explore how each is responding and what is needed during this unprecedented time.
- **Coordination and Linkage:** Representatives of state CSBG offices can share not only information and the position of state government regarding CSBG, but also how other funding streams and programs (CDBG, SNAP, Unemployment Insurance) are being deployed. State CSBG offices and Community Action Associations play an important connector role for the Community Action Network. Equally as important is for the state CSBG office and Community Action Association to share with other partners what CAAs on the ground are doing and what they need.

- **Joint Collaboration on Best Methods for Implementing CARES Act Funding for CSBG**

Depending on individual state contracting and reporting procedures and local agency infrastructure, capacity, and process, there are many approaches that can be taken to assure effective and efficient delivery of CSBG CARES Act funding. Staff at all levels of the Network should be driven by the intentions of **timeliness and maximum flexibility** to meet the needs of families and communities during this unprecedented crisis. Creative and collaborative problem-solving of the following tasks will be needed:

- **Contracting:** State CSBG offices manage contracts in many different ways: Some states execute contracts within the CSBG office unit; others utilize a separate procurement unit. Some states have contract periods of 12 months; others may have periods of 18 or 24 months. Some states have quick processes for modification and amendment; others have more lengthy procurement practices. Each individual structure and process will have a bearing on the timeliness and flexibility of the release of CARES Act funding. If joint conversations are not yet taking place in your state between the state CSBG office, the Community Action Association, and CAAs, we recommend beginning these now so that all parties in state government and the CAAs know what to expect and can implement flawlessly. Ideally, a contracting plan that builds on everyone's previous experience and responds to the needs of all involved should be developed.
- **Community Action Plans:** While states are required to collect a Community Action Plan as a condition of CSBG funding, they do have maximum flexibility on the plan's content and structure. In keeping with the nature of a block grant OCS has not provided direction to states regarding Community Action Plans. In IM 158 OCS indicated states will be required to submit a CSBG Plan amendment to OCS by August 31, 2020 and that additional instruction would be provided. At this time states do not have detailed information about what OCS may require of them for the CSBG Plan amendments. However, it is important to note OCS asked states to begin immediate distribution of resources to eligible entities.
- **Community Needs Assessments:** States have great flexibility in outlining the requirement for a community needs assessment from each CAA and should consider working with CAAs and the state Community Action Association to allow updates of existing assessments or to collaborate on creating a common assessment tool or template to minimize burden. The Partnership has released a [COVID-19 Community Assessment Update Template and Data Resource Guide](#) which could be used by CAAs as a supplement to their existing Community Needs Assessment. Another resource is the Partnership's [Community Action Data Hub](#), an online data and mapping tool that identifies many helpful data sources and produces a customized community needs assessment for a particular service area.
- **Individual/Family Eligibility:** OCS provided clarification in IM 157 indicating the CARES Act authorizes states to revise the income eligibility limits from 125 to 200 percent of the federal poverty level for CSBG services provided during fiscal years 2020 and 2021. States have authority over eligibility policies related to income calculation, definitions, and all other policies/procedures related to eligibility. Some states establish these policies through statute, some establish them as administrative policies while others defer eligibility policies to CAAs. OCS guidance issued in CSBG IM #154 Disaster Flexibilities and Waivers, on March 7, 2018, indicated that the review of existing procedures and eligibility processes is encouraged during disasters. States and CAAs may want to work together to determine if revising policies for

signatures, allowing verbal attestation, and relaxing other eligibility determination methods may be necessary during this unique period. Utilizing the state's flexibility may help agencies provide services more efficiently and respond more quickly to rapidly changing conditions. CAPLAW has a comprehensive [CSBG Q&A On Client Eligibility](#) that addresses many different eligibility issues, including how individual eligibility may not be required for some services and strategies. The National Community Action Partnership strongly encourages all states to maximize this flexibility and increase eligibility to 200% of FPL. The fluctuating needs of families and communities will continue and CAAs should be given the maximum flexibility allowed to meet the needs of their local communities within the statute.

- **Accountability and Oversight:** The Community Action Network has a very strong performance management system that addresses accountability at the federal, state, and local levels. During the COVID-19 crisis all members of the Community Action Network are responding to this all-hands-on-deck moment. As the crisis is still unfolding, we cannot know the full extent of its impact. But as we respond and move toward recovery, partners at all levels of the Community Action Network will need to discuss its impact on various accountability and performance systems, including monitoring, the CSBG Organizational Standards, State Accountability Measures, and reporting. We believe that flexibility and reasonableness must be part of the process.

**2. Maximize Flexibility to Respond Creatively: Community Action Network members should seek to maximize flexibility to respond creatively to families' and communities' emerging needs stemming from the immediate crisis and the eventual recovery.**

Community Action Network members have already demonstrated their commitment to responding to the unique needs of the individuals and families in their communities while balancing staff health and safety. As conditions continue to develop and change, ongoing communication and flexibility is essential across the Community Action Network.

- **Budget Flexibility:** States should consider constructing contracts that allow CAAs greater latitude to deviate across budget categories without formal budget modifications.
- **Balancing Emergency Services and Building Social and Economic Mobility:** Considering that a startling 33 million unemployment claims have been filed in the last seven weeks, we should expect demand for emergency services to continue and grow. The Community Action Network will need to work together to develop innovative approaches to providing the critical emergency services some families will require to maintain stability while helping others to continue their more intensive journeys to social and economic mobility. Finding these approaches may require strengthening staff skills in coaching and providing person-centered responses that meet customers where they are with their unique mix of challenges and strengths.
- **Balancing Individual Service Delivery with Building Equity—Particularly Racial Equity:** Racial disparities, inequities in health outcomes and health care, and economic inequities have placed many squarely in harm's way and excluded them from prevention and mitigation efforts like social distancing. As we emerge from the immediate crisis, we need to pay particular attention to the present-day impacts of social injustice and inequities and use this time to direct our path towards ensuring that everyone has access to the circle of care.

**3. Protect Customers and Staff: Protecting the physical health and emotional well-being of customers and staff is critical.**

Prioritizing the physical health and emotional well-being of not only our customers but also staff at all levels of the Community Action Network is vital as we navigate this crisis and recovery. The COVID-19 pandemic places everyone, regardless of income, under unusual social and economic stressors that can undermine well-being. Physical distancing can turn into social isolation, which can exacerbate existing material hardship, domestic violence, and other threats to well-being. As agencies and states plan for the use of CSBG and other CARES Act funding, identifying how to deliver services in a manner that cultivates healing and resiliency and protects the physical health and emotional well-being of both CAA staff and customers will require joint problem-solving, common sense, creativity, and compromise.

**4. Deliver Impact: All members of the Community Action Network have a role to play in delivering impact for individuals, families, and communities and everyone should be committed to delivering, capturing, and highlighting that impact.**

As OCS and states develop additional guidance, reporting requirements will come into focus. As the National Community Action Foundation (NCAF) has noted, it will be vitally important for the Community Action Network to deliver and capture the impact of the CSBG funding provided by the CARES Act. There is an immediate imperative to capture CAA efforts to respond to local needs. Local agencies, state CSBG offices, state associations and the national partners must find creative methods and avenues to educate a range of stakeholders about what CAAs and states are doing. The Partnership requests that agencies share examples of needs, services, key contributions, news/press, and customer stories [through this online portal](#) or by emailing the information to [csbg@communityactionpartnership.com](mailto:csbg@communityactionpartnership.com).

**National Community Action Partnership**

We are committed to supporting local, state and national partners as this crisis unfolds. It is likely we do not yet fully comprehend the contours of the conditions we face now and will encounter in the approaching weeks and months. We are committed to supporting the Network and we want to hear from you. If you have feedback or needs, please do not hesitate to share them with a member of the Partnership staff. For the present time we are using the following channels to listen, learn, and share information.

- **Weekly Webinars/Calls**
  - Weekly CAA Call (Thursdays at 3 pm ET/2 pm CT/1 pm MT/12 pm PT) Registration is required.
  - Weekly State Association Call (Fridays at 12 pm ET/11 am CT/10 am MT/9 am PT)
- **National Community Action Partnership Web Site:** [Community Action Partnership Guidance & Resources for Managing Coronavirus](#)

**Additional National Partner Resources**

- [Community Action Program Legal Services, Inc. Coronavirus Updates for the Community Action Network](#)
- [National Association for State Community Services Programs Coronavirus Resources](#)
- [National Community Action Foundation COVID-19 and Community Action](#)

### **The Promise of Community Action**

*Community Action changes peoples' lives, embodies the spirit of hope, improves communities, and makes America a better place to live.*

*We care about the entire community, and we are dedicated to helping people help themselves and each other.*

