



To: CSBG Eligible Entities
From: Community Programs Division
Release Date: April 20, 2020
Effective Date: April 20, 2020

Program Guidance: CSBG-2020-01

Subject: Eligibility Determination and Technology

In response to the ongoing COVID-19 pandemic and [guidance](#) from the Office of Community Services (OCS) within the US Department of Health and Human Services (HHS), beginning April 20, 2020 the following guidance is in effect:

Eligibility Determination

According to guidance provided by OCS on April 13, 2020, The CARES Act authorizes states to revise the income limit for the eligibility ceiling from 125 to 200 percent of the federal poverty level for CSBG services furnished during fiscal years 2020 and 2021, including services furnished with the state's regular CSBG appropriations during those years.

IHCDA hereby revises the eligibility ceiling for Indiana to 200 percent of the federal poverty level for CSBG spending during federal fiscal years 2020 and 2021, which ends September 30, 2021; this applies to FY2019 Carryover funds, FY2020 funds, FY2021 funds and CARES Act funds. This decision is based on [IM-157](#), which interprets the CARES Act as allowing states to raise the income limit for "CSBG services furnished during fiscal years 2020 and 2021, including services furnished with the state's regular CSBG appropriations during those years"

Currently, there is no state-mandated method for verifying income in Indiana, only that CSBG Eligible Entities have a written policy for verifying income for all programs that are supported with CSBG funds, and that staff follow that policy. Eligible Entities are encouraged to review their policies during this time and establish emergency verification procedures for individuals that may have become low income as a result of the emergency. Such procedures may include flexibility in accepting signed statements from the family attesting to necessary eligibility information, pending availability of standard documentation.

Technology Purchases

For any technology purchase that can be attributed directly to a specific program or programs, that purchase must be directly charged to the respective program or programs. For any programs that have run out of funding for technology costs, or that never



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had technology as a budget line item, CSBG program funds can cover the costs of the technology purchases, as long as:

- The other program's rules allow for CSBG funds to be used to cover costs
- The other program serves individuals at or below 200% of the federal poverty level
- The other program serves the needs outlined in the CSBG Act

If equipment is purchased specifically for a program in the long-term but is used by administrative staff during the COVID-19 response, the cost of that equipment may still be covered by program funds. If the cost of the equipment is over \$5,000, when the Eligible Entity requests IHCDCA approval, it must outline how long administrative staff will use the equipment and what purpose the equipment will serve after the COVID-19 pandemic is over.

For any costs that cannot be directly attributed to a specific program, Eligible Entities must follow their cost allocation plan. If any Eligible Entity is unable to cover the costs of a technology purchase through cost allocating, they are encouraged to contact IHCDCA staff immediately to discuss the possibility of a federal waiver for use of CSBG funds. When reaching out to IHCDCA, the Eligible Entity should have a cost estimate and/or scope of work ready to share as a part of the discussion.

Please direct all questions regarding this guidance to Veronica Watson at vwatson@ihcda.in.gov.