



## DEPARTMENT OF ECONOMIC SECURITY

*Your Partner For A Stronger Arizona*

Katie Hobbs  
Governor

Michael Wisehart  
Director

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To: Community Action Contractors  
From: Community Action Program Administration  
Re: Guidance and Waivers Regarding COVID-19

In light of the COVID-19 pandemic, the Community Action Program is issuing guidance and waivers for certain contractual requirements. Unless otherwise noted, these waivers are effective March 11, 2020, and expire on **March 31, 2023**. Updates to the guidance will be communicated by email and posted to the website.

### ELIGIBILITY

**30-day Income:** If an individual's employment has been terminated or hours reduced, Community Action Agencies (CAAs) may anticipate the household prospective income for the 30 days *after the date of application*, and use that figure instead of the income from the previous 30 days. Employer verification must be attempted. In case of employer closures, an applicant's attestation may be accepted as verification. Caseworkers must thoroughly document all instances where future income is used for eligibility determination (This exemption does not apply to LIHEAP effective 10/1/2022).

**New LIHEAP Portal:** As of October 1, 2022, LIHEAP eligibility and benefit disbursement will be completed by DES via the "Housing Stability and Utility Assistance Programs" portal. CAAs will take on the role of Community Navigation, which assists households in applying for utility assistance and other services via the portal. CAA's will also provide case management services for households in need of services. CAA's will retain funding for Assurance 16 activities and Weatherization via the Department of Housing.

**CSBG Income Threshold:** Use of 200% FPL remains allowable for services furnished under the CSBG Act with funds made available for such purpose and you may use an income eligibility threshold of 200% of the federal poverty level rather than 125% through September 30, 2023.

### SERVICE PROVISION

**Home Visits:** CAAs are exempt from the requirement to provide home visits to clients of limited mobility. However, CAAs must maintain an ability to serve such clients by another mechanism.

## DOCUMENTATION

**Original Documents:** CAAs may accept photographs, photocopies, and faxes of documents in lieu of originals.

**Documents on File:** For clients who have previously been assisted, CAAs may reuse non-expired copies of documents on file, which demonstrate identity and citizenship (e.g. passports), *only for TANF/STCS, NHN, and CSBG*. CAAs may not reuse documents which demonstrate residency, income, or energy burden. LIHEAP documentation will be housed in the Housing Stability and Utility Assistance portal.

**Phone Signatures:** CAAs may accept an applicant's attestation over the phone in lieu of a wet signature. Caseworker must verify the identity of the individual on the phone (e.g., by asking for name and date of birth) and make a case note that verbal attestation was used.

## ADMINISTRATION

**Subrecipient Monitoring:** DES is reinstating limited on-site subrecipient monitoring. Desk monitoring conducted during the term of this waiver may be used to satisfy the subrecipient monitoring requirement of Community Action Services Program Scope of Work §5.7.2, provided that the desk monitoring includes review of all required components other than subrecipient facilities.

Please contact the DES Community Action Program team if any clarification is needed. DES appreciates the partnership of the CAAs and their commitment to low-income Arizonans in these trying times.

Sincerely,

*Shelley Morgan*

Shelley Morgan  
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