From:	
Sent:	
To:	
Subject:	

Fisher, Megan Monday, August 17, 2020 4:36 PM FSD CSBG Cares Public Comment Cares Act Funding

Low income families that are in need of internet to be able to do the online learning they now have to do should be provided with internet. People whose jobs were impacted by covid need some sort of additional rental /utility assistance program that they can use while trying to obtain other employment. The employees that work for the state to assist at risk and unsafe families really need to be provided with computers to work from home so they can efficiently assist clients in the community. Local PAT agencies really need to be given additional supplies to provide at home learning enrichment opportunities for at risk youth.

\*Also, daycares that are being paid to feed children their meals really should not be utilizing the free lunches or meals that were intended for school age children lunches that are at risk of not getting to eat without being provided that food.

These are just my own thoughts, not endorsed by my agency.

# Megan Fisher, LMSW

Field Support Manager Jackson County Children's Division 615 E 13th Street Kansas City, Mo. 64106 Phone:816-889-2144 Fax: 816-889-2210

#### please consider the environment before printing this email

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From:	Lewis, Julie
Sent:	Tuesday, August 18, 2020 10:04 AM
То:	FSD CSBG Cares Public Comment
Subject:	Foster Children

My suggestion would be to set aside a specific amount for foster children that are in an Independent Living Arrangement to apply for.

# **Julie Lewis**

Children's Service Worker II-SE Royals Life Skills Specialist 314-620-3643 10325 Business 21 Suite 200 Hillsboro, MO 63050

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From: Sent: To: Subject: Attachments: Tammy Walker <twalker@escswa.org> Wednesday, August 19, 2020 4:24 PM FSD CSBG Cares Public Comment CSBG CARES public comment CARES public comments.pdf

Tammy M. Walker, CCAP, NCRI Director of Community Development Economic Security Corporation of S W Area 302 Joplin Joplin, MO 64801 417-627-2016

# "You are a light. You are the light. Never let anyone – any person or any force – dampen, dim or diminish your light." -- Congressman John Lewis

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P.O. BOX 207 | 302 SOUTH JOPLIN | JOPLIN, MO 64802 417.781.0352 | FAX 417.781.1234 | ESCSWA.ORG



August 19, 2020

MO State Community Services Block Grant Unit Attn: Public Comment for MO Coronavirus Aid, Relief and Economic Security (CARES) Act funding state plan amendment 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

To Whom It May Concern:

Community Action has a long-standing reputation for delivering services that help low-income families and individuals achieve economic stability. The Community Services Block Grant (CSBG) funding is flexible and can be used to respond to the unique needs of our community. Economic Security Corporation is poised to respond to this global pandemic by offering a comprehensive response to the needs in our community.

ESC's current 2020 Community Needs Assessment has documented data showing the need to increase the Poverty guidelines to 200%. Countless families are suffering and need of assistance with employment, education, childcare, housing, transportation and healthcare.

The pandemic has highlighted something Community Action has known for many years, that many families who are slightly above the 125% poverty guideline are still struggling, living pay check to pay check. They too are suffering financial hardships due to this pandemic. ESC supports increasing the income guidelines from 125% of the Federal Poverty Level to 200%. Giving agencies the flexibility to address the current needs of Missourians who are struggling is critical.

Helping people Changing lives



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We are asking respectfully that the State of Missouri's Community Services Block Grant Unit consider this request to increase the Poverty guidelines for the Community Services Block Grant to 200%. We believe that this change will allow our agency to provide needed services to low-income Missourians. Increasing the income guideline is the right thing to do for our state.

Sincerely,

Tammy M. Wałker, CCAP, NCRI Director of Community Development

Helping people Changing lives

From:	Audrey Phelps <vimphelps@gmail.com></vimphelps@gmail.com>
Sent:	Thursday, August 20, 2020 10:39 AM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act Increase

To Whom It May Concern,

I have reviewed the Missouri State Plan for CARES Act funding and have noted that we are not following the Congressional recommendation of increasing eligibility to 200% of the Federal Poverty Level. Prior to COVID, many families were one major event away from financial insecurity. COVID has been the event that has bumped many previously stable families into financial instability. These families NEED these services. Please reconsider your decision, and increase eligibility for Missouri CARES Act funding to 200% of the Federal Poverty Level (FPL) in consideration of:

- 1. Congress specified eligibility up to 200% FPL;
- 2. 200% increases flexibility to serve those most severely impacted by the pandemic;
- 3. Families who have seen declines in their income are less stable than those who have had consistent public benefits under the traditional 125% FPL.

Thank you for your consideration.

Sincerely,

**Audrey Phelps** 

From:	Stephanie Watson <stephanie.watson@cornerstonesofcare.org></stephanie.watson@cornerstonesofcare.org>
Sent:	Thursday, August 20, 2020 12:27 PM
To:	FSD CSBG Cares Public Comment
Subject:	Community Services Block Grant (CSBG) Funding
Importance:	High

Good afternoon! I work with Central Missouri Community Action (CMCA), an organization that serves as our community's eligibility entity for the Community Services Block Grant (CSBG) funding to address local causes and conditions of poverty. My understanding is that, through the CARES Act, Congress has appropriated funding to CSBG to service families and communities affected by the COVID-19 pandemic. I have had the opportunity to review the State Plan and would like to see the allowed eligibility increase from 125% of the Federal Poverty Level (FPL) to 200% of the FDL, as approved by Congress. As a result of this increase, I believe CMCA will be able to be more responsive to people and communities feeling the effects of the COVID-19 pandemic. We have seen so many families who have experienced declines in their income and this has resulted in their financial stability. Please consider the increase to 200% FPL. Thank you!

Stephanie L. Watson, B.S. Family Development Specialist Cornerstones of Care- Warrensburg Campus 1125 N. Simpson Dr.~Suite J Warrensburg, MO 64093 Direct Line: (816) 832-1740 Fax: (816) 508-6290



Partnering for safe and healthy communities. cornerstonesofcare.org

From: Sent: To: Romona Smith <romonas1967@gmail.com> Thursday, August 20, 2020 6:15 PM FSD CSBG Cares Public Comment

I work at a local headstart and it is very upsetting to see families struggling to work and keep up with high childcare and living costs. Our program could help these struggling families if the proverty level was raise to 200%. Please, I encourage you to help us ensure the children, that will be are future, are taken care of. Thank you for your time. Romona Smith Carrollton Head Start

From:	Lisa Gilmore <lgilmore@oac.ac></lgilmore@oac.ac>
Sent:	Friday, August 21, 2020 4:39 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act Funding

I vote for 200% because there are hundreds of families in my community alone that are just above the state threshold for any kind of assistance.

Get Outlook for Android

From: Sent: To: Subject: Rick Gardner <rgardner@kw.com> Friday, August 21, 2020 3:25 PM FSD CSBG Cares Public Comment CARES

I am in favor of the 200% eligibility guideline.

#### Rick Gardner





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From: Sent: To: Subject: Nora Springston <nspringston@oac.ac> Friday, August 21, 2020 4:17 PM FSD CSBG Cares Public Comment Comment

As an OACAC employee, I stand behind the 200% income eligibility guideline.

Sincerely, Nora Springston Nora Springston Teacher Assistant Republic EHS

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From:	Lynch, Sharon
Sent:	Friday, August 21, 2020 2:40 PM
То:	FSD CSBG Cares Public Comment
Cc:	Kellie Pontius
Subject:	Community Services Block Grant (CSBG)

Please consider allowing the CSBG to be utilized up to 200% of Federal Poverty Level (FPL). This higher percentage allows working families to benefit from the program that are funded by this grant. Callaway county has identified working poor families as an area that needs increased interventions. These families are hanging on and any kind of negative life event can send them into poverty once again. Poverty is a large dark hole that it is becoming harder and harder to crawl out of in our country. Middle class America is shrinking and we all need to do what we can to impact the lives of families that are striving to improve themselves and their children's lives

Sharon Lynch Director Callaway County Health Department 573-642-6881 ext. 105

From:	Michael and Laura Ward <wardsinjeffcity@mchsi.com></wardsinjeffcity@mchsi.com>
Sent:	Friday, August 21, 2020 8:18 AM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG Funding Increase

I support the eligibility increase in CSBG funding for Central Missouri Community Action to address local causes and conditions of poverty. Congress specifited eligibility up to 200% FPL which would increase flexibility to serve those most affected by the pandemic. Families, who have seen declines in their income, are less stable than those who have had consistent public benefits under the traditional 125% FPL and this increase would help those greatly.

Thank you for this consideration.

Laura A. Ward

Michael L. & Laura A. Ward 115 West Atchison Street Jefferson City, MO 65101 573-999-0915

From:	Patty Aldridge <paldridge@oac.ac></paldridge@oac.ac>
Sent:	Friday, August 21, 2020 1:44 PM
То:	FSD CSBG Cares Public Comment
Subject:	Income guidelines

I believe the income guideline should be increased for ESSENTIAL WORKING FAMILIES TO INCLUDE SUPPORT OF INCREASED COSTS FOR UNEXPECTED CHILD CARE COSTS- DUE TO THE FACT THAT THEY WERE REQUIRED TO WORK. THEIR CHILDREN COULDN'T GO TO SCHOOL. THESE FAMILIES DID NOT GET TO COLLECT UNEMPLOYMENT AND THE BONUS \$600. A WEEK. THOSE INDIVIDUALS HAD NO CHILD CARE EXPENSES. PLEASE SUPPORT THE LOWER MIDDLE CLASS WORKING FAMILIES!

Patty Aldridge Office Manager OACAC Head Start

215 S. Barnes Springfield, MO 65802 (417) 864-3430 FAX: (417) 864-3449

From: Sent: To: Subject: Melannie Frater <melannie.lynn@gmail.com> Friday, August 21, 2020 5:22 PM FSD CSBG Cares Public Comment Increase Funding to Serve 200%

A 200% eligibility guideline would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. Proposed uses include direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosure, transportation costs, mental health support, dental and vision costs, employment supplies such as technology and PPE, educational support, and food security.

From: Sent: To: Subject: Ashley Grayson <homemanagerfmc@gmail.com> Friday, August 21, 2020 10:37 AM FSD CSBG Cares Public Comment Increase in funds for CMCA

Hello -

I am a case manager working with pregnant women in Missouri. We have seen an increase in the financial needs since COVID-19 and we have not been able to cover the necessary expenses to promote healthy families. Our clients have had issues finding employment as they are at a higher vulnerability due to their pregnancy in a pandemic. Please consider increaseing the funds for CMCA, as it is a valuable resource that we often utilize as a referral and additional support for many of our clients.

Thank you for caring for families in Missouri, Sierra Leisinger

From:	Kelly Dillon <kdillon@oac.ac></kdillon@oac.ac>
Sent:	Friday, August 21, 2020 3:40 PM
То:	FSD CSBG Cares Public Comment
Subject:	Increase the poverty guideline to 200%

Hello Ms. Tidball,

Please consider increasing the state poverty guideline percentage to 200%. There are many a people who are just, and I mean just, over the 125% threshold who you are excluding from assistance and who are really in need at this time through no fault of their own. Every citizen in need should not have to stress about keeping a roof over their head, food in their bellies, or gas in their car. Our organization provides a wonderful service for those in need, so let's be able to help those additional individuals and families get through this crisis!!



Kelly Dillon Payroll/ Accounts Payable kdillon@oac.ac DID: 417-873-3384 Fax: 417-873-3399 Website: www.oac.ac



Empowering People, Enriching Communities

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written consent of the person to whom it pertains, or as otherwise permitted by law.

From: Sent: To: Charity H <coffeeguru33@gmail.com> Friday, August 21, 2020 4:07 PM FSD CSBG Cares Public Comment

Never received any response from them

From:	Misty Schmitz <mschmitz@oac.ac></mschmitz@oac.ac>
Sent:	Friday, August 21, 2020 2:18 PM
То:	FSD CSBG Cares Public Comment
Subject:	We want the 200% Income eligibility

At OACAC, we firmly stand in support of a 200% income eligibility guideline. Our CSBG Neighborhood/Community Centers program has been determined to be an eligible entity to receive funding under the CARES Act.

Misty Schmitz Family Advocate Douglas Head Start Part Day and Extended Day Programs 417-831-4540 1042 S Douglas Springfield, MO 65807



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From:	Phillip Iman <phillip.iman@mexicohelpcenter.org></phillip.iman@mexicohelpcenter.org>
Sent:	Saturday, August 22, 2020 12:26 PM
То:	FSD CSBG Cares Public Comment
Subject:	200% of the Federal Poverty Level

Hello,

I am the Executive director of The Help Center Inc. in Mexico, MO. As such I work directly with people in poverty every day and currently specifically with people affected by poverty and COVID-19 at the same time. We are partners with Central Missouri Community Action Agency and we make referrals to their agency daily for energy assistance and others types of assistance based on what they currently have funding for. We ourselves work mainly on private funding as we are a Salvation Army and a food pantry.

I have great concerns that the State of Missouri is not utilizing the 200% of the FPL recommendation approved by Congress when providing guidance to agencies administering funding for the CARES Act and CSBG program.

Please, try to place yourself in the shoes of people who were struggling prior to the pandemic and now are almost crippled by the effects of this pandemic. Unless you are working daily in the field of caring for and about people who struggle with poverty and are near poverty because they are underemployed, I don't think you can truly understand their struggle. I urge to consider utilizing the 200% of the FPL as the base for being able to assist families and individuals who are struggling. The difference will be night and day when comes to helping these families move towards a more sustainable lifestyle with a little more support for caring and compassionate agencies like ourselves and CMCA.

I know that you do care about all of the citizens of Missouri and you want to do the right thing. Please take it from us, here on the ground, working every day to serve our friends and neighbors, this will have a huge impact on the lives of so many. I would be glad to speak further with anyone willing to listen to and learn from my experiences serving others.

#### Phillip Jman

Executive Director, The Help Center Inc. DBA The Laura Miller George Help Center 409 Fairground St., Mexico, MO. 65265 573-581-3238 Phillip.Iman@mexicohelpcenter.org

We are proud to be partially funded by The United Way of Audrain County, and the many individuals, churches, organizations, businesses and charitable foundations who make what we do possible!



From:	Bill Kennedy <wrk8119@gmail.com></wrk8119@gmail.com>
Sent:	Saturday, August 22, 2020 12:39 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act state plan comment

It is my understanding that the Missouri Legislature has failed to increase the poverty level eligibility income guidelines from its current level of 135% to a 200% level. During this pandemic with the pressure of employment limitations and loss of federal unemployment the number of people in the gap between current poverty level eligibility guidelines and a proposed 200% eligibility level has increased significantly. I respectfully request the Missouri Legislature reconsider the matter of eligibility for assistance at the 200% level above the poverty guidelines at least for 18 months. This will help struggling families during the pandemic, the winter months and the economic downturn. Such an action would dramatically provide support for families in the South West corner of Missouri. Thank you. William Kennedy

From:	Virginia Moore <virginiabrill@gmail.com></virginiabrill@gmail.com>
Sent:	Sunday, August 23, 2020 7:31 PM
То:	FSD CSBG Cares Public Comment
Subject:	200% poverty level guidelines

I am in full support of raising the Missouri income eligibilities to 200% of the poverty level. 125% is too low and too many families are falling through the cracks!

From:	Nancy Masner <nmasner@oac.ac></nmasner@oac.ac>
Sent:	Monday, August 24, 2020 8:45 AM
То:	FSD CSBG Cares Public Comment
Subject:	200% eligibility guideline

I wholeheartedly support 200% 2020 Poverty level as a guideline for the CSBGCares funding. The COVID-19 pandemic has affected families who may have not been eligible for assistance in the past due to their annual income exceeding the poverty guidelines. With school starting and families having to choose between seated or virtual classes, they will need our help to meet basic needs of the family. I urge you to consider establishment of guidelines at 200% of poverty level.

Nancy Masner Housing Program Director OACAC Housing / Dallas County PHA MO216 215 S. Barnes Springfield MO 65802-2204 417-864-3440 Fax: 417-873-3360



From:	Chris Drew <cad6174@gmail.com></cad6174@gmail.com>
Sent:	Monday, August 24, 2020 8:47 PM
То:	FSD CSBG Cares Public Comment
Subject:	200% Income Eligibility Guideline

To whom it may concern,

I am wanting to reach out with public comment for the Missouri Department of Social Services' proposed amendment to the State CSBG Plan for CARES Act funding. I support a 200% Household poverty guideline for income eligibility. This will allow proven local organizations to best serve their communities in these unprecedented times, when many people may be dealing with the risk of hunger, homelessness, and joblessness for the first time.

Thanks, Chris D. Springfield, Mo. 135th District

From:	Jody Godfrey <jgodfrey@oac.ac></jgodfrey@oac.ac>
Sent:	Monday, August 24, 2020 9:24 AM
То:	FSD CSBG Cares Public Comment
Cc:	Lindsey Dumas-Bell
Subject:	200% poverty guideline

I am in favor of the 200% !!!!

Jody Godfrey Family Resource Specialist OACAC – Taney County Neighborhood Center 610 S. 6<sup>th</sup> Suite 202 Branson, MO 65616 Phone: 417-239-1882 FAX: 417-239-3833 My email address has changed to: jgodfrey@oac.ac

From: Sent: To: Subject: Sherry Bennett <sherryb@buffaloreflex.com> Monday, August 24, 2020 9:51 AM FSD CSBG Cares Public Comment 2020 Poverty Guidlines

I would like to support the 200% poverty guideline for the Cares Act. I feel this is broaden the families OACAC can serve in Southwest Missouri. Families that need assistance that have never qualified or asked for help.

Sherry Bennett 58 Wall Street Road Long Lane, MO 65590

417-345-8083

From:	Joyce Ince <jince@oac.ac></jince@oac.ac>
Sent:	Monday, August 24, 2020 10:20 AM
То:	FSD CSBG Cares Public Comment
Subject:	CARES act

I support the 200% income eligibility guideline. The American workers and their families need the fast and direct economic assistance.

Please pass this CARES act and increase the income eligibility guideline.

Joyce Ince Teacher Assistant Stewart 3 Early Head Start

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From:
Sent:
To:
Subject:

Katrina Green <katgrn59@yahoo.com> Monday, August 24, 2020 12:14 PM FSD CSBG Cares Public Comment Cares Act

I firmly stand in support of a 200% income eligibility guideline For the CARES ACT. A 200% eligibility guideline would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. Please go with the 200 % income eligiblility.

Katrina Green

From:	Dawn Maize <dmaize@oac.ac></dmaize@oac.ac>
Sent:	Monday, August 24, 2020 4:26 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act Funding

To Whom It May Concern:

I wanted to express my support for the 200% income eligibility guideline for Missouri CARES Act. This increase in the poverty guideline would serve many more families who are struggling during these extraordinary times. Meeting basic needs are now a real concern for families who've never found themselves in these circumstances. Health, dental, vision, mental health, transportation, housing, and food insecurity are just a few of the obstacles they now face. In addition, parents who were once working may now be facing a decision of having to home school or assist with online education for their children. Grandparents who are raising their grandchildren are often not receiving any additional financial support as they may not qualify for assistance due to their income and are left to struggle to make ends meet. This change could make a real difference to these families.

The 200% eligibility guideline would allow many additional people in need to receive the services that could support them during these times. I want to ask for your support to make this change.

Thank you,

Dawn Maize Family Engagement Specialist OACAC Head Start/Early Head Start 215 S Barnes Springfield, MO 65802 417-864-3430 dmaize@oac.ac

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From:	Josh Teague <lunedecente@gmail.com></lunedecente@gmail.com>
Sent:	Monday, August 24, 2020 11:20 PM
То:	FSD CSBG Cares Public Comment
Subject:	Cares act funding

I support the increase in eligibility. These are trying times for many people and being able to have members of my community receive the help they need would be greatly appreciated.

From:	Amy Michelle <moments.byamy@outlook.com></moments.byamy@outlook.com>
Sent:	Monday, August 24, 2020 2:01 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act funding

Department of Social Services,

I want to stress my concern for families in need that may not fit typically qualify for low income assistance. I support 200% income eligibility. Please consider children and their families in this time of need so we can get them in programs to nurture growth and allow families more success in looking for work or continued education.

Thank you for allowing in put and please consider the children who cannot advocate for themselves.

Sincerely, Amy Holte

Sent from Mail for Windows 10

From:	Charles Johnson <cjohnson@oac.ac></cjohnson@oac.ac>
Sent:	Monday, August 24, 2020 10:18 AM
То:	FSD CSBG Cares Public Comment
Subject:	CARES ACT

What I see in, request for assistance, in clients directly affected by COVID19 is often they <u>are</u> low income, but can't meet the poverty guidelines when set at 125%. It should be set at 200% which is much more realistic for Missourian's needing help, please reconsider income guidelines to help those hit hardest by the pandemic. Sincerely,

Charles Johnson Greene Co. OACAC 417-447-0554 Ext.4 cjohnson@oac.ac

From: Sent: To: Subject: Attachments: Bill Bunch <bill@sfccp.org> Monday, August 24, 2020 12:21 PM FSD CSBG Cares Public Comment Comment attached 20200824122212174.pdf

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William Bunch Executive Director St Francois County Community Partnership 1101 Weber Rd., Suite 202 Farmington, MO 63640 Phone: 573-760-0212 Mobile: 573-701-6238 Fax: 573-760-0451

# East Missouri Action Agency Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape Girardeau, Iron, Madison, Perry, Ste. Genevieve, St. Francois and Washington.

As an organization, **St. Francois County Community Partnership** serves and advocates for low-income residents of St. Francois County. We are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the area of: the income eligibility threshold for services

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. We respectfully request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very
  purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience,
  resources, and infrastructure of [CAA] to deliver the services our region needs now more than
  ever.
- Furthermore, Congress has failed to pass a third stimulus bill, thus unemployment benefits have expired for many of the County's unemployed due to the pandemic. The need to expedite the authorization for these funds is now!

Sincerely, William Bunch

Executive Director St. Francois County Community Partnership

From:	Cody Willis <cwillis@oac.ac></cwillis@oac.ac>
Sent:	Monday, August 24, 2020 5:17 PM
То:	FSD CSBG Cares Public Comment
Subject:	Eligibility guideline

I strongly support the 200% eligibility guideline. I believe that if we can reach more individual households, then we have a higher possibility of the communities we serve, reaping that dividend in the future. Thanks.

Cody Willis

From:	Chris Parker < chris.parker@senioragemo.org>
Sent:	Monday, August 24, 2020 7:42 AM
То:	FSD CSBG Cares Public Comment
Subject:	Eligibility guidelines

Many people never before affected, are now asking for help during these unprecedented times. As the administrator of a senior center, I have seen an upsurge in people needing assistance. I would request that the eligibility guidelines be changed to 200% of the poverty level in order to help a broader base of those who find themselves in a predicament through no fault of their own. Thank you,

--

# Chris Parker, AIRS Certified

Administrator

#### Marshfield Senior Center

Phone: 417-859-3555

Fax: 417-859-6089



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From:	Bernice Noble  hoble43@exede.net>
Sent:	Monday, August 24, 2020 11:39 PM
То:	FSD CSBG Cares Public Comment
Subject:	Income Guidelines in the proposed CSBG CARES Act Supplemental State Plan

Dear DSS Direcors:

Regarding the CARES Act State plan as shown in subject above I think you should increase the eligibility income level from 125% poverty level to 200% property level so that more people can get the help they so desperately need.

Thanks.

Bernice Noble 8417 State Route C Ste. Genevieve, MO 63670

From: Sent: To: Subject: Jennifer Zumalt <jenni200509@yahoo.com> Monday, August 24, 2020 4:04 PM FSD CSBG Cares Public Comment Poverty Guidelines

Hello,

The current poverty guidelines are extremely low and unrealistic at this point. They need to be updated, to at a minimum 185%, preferably 200%! With more people needing assistance , now is the time to make this change. Join the other states and help those at risk who often fall through the cracks due to income. Folks should not be penalized for working hard trying to make ends meet. They sometimes need help and other assistance too. Please continue to research this idea and make changes to better serve those who are most at risk.

Thank you, Jennifer Coen

Sent from Yahoo Mail on Android

From:	
Sent:	
To:	
Subject:	

Morgan Sloan <morgansloan95@gmail.com> Monday, August 24, 2020 9:55 PM FSD CSBG Cares Public Comment Public Comment

Please consider raising the eligibility guidelines for CARES funding relief efforts. We currently find ourselves in a time where most everyone needs a little help to scrape by. The unfortunate fact of the matter is that the poorest of the poor are not the only people impacted by the pandemic. The poorest of the poor are generally resourceful and familiar with the resource landscapes of their communities. At this time, we need to assist our poorest poor, but we also need to extend a helping hand to those who don't normally ask for services and have found themselves in need. During times of crisis, we should do as much as we can to avoid restrictive policy and red tape to allow our communities to be best served by this funding.

Sincerely,

Morgan Fulton 6606319237

From:	Jennifer Shotwell <jshotwell@aaaregionx.org></jshotwell@aaaregionx.org>
Sent:	Monday, August 24, 2020 10:02 AM
То:	FSD CSBG Cares Public Comment
Subject:	Raising % of Poverty Level

To whom it may concern,

Please accept the following as my public comment on the CSBG Cares funding:

I support an increase in the % of poverty to determine eligibility. To keep the current 125% of poverty stipulation will not give enough lower income seniors the ability to participate in programs under this grant. I suggest 200% of Poverty be the income guideline.

#### Sincerely, Jennifer Shotwell

Chief Executive Officer Area Agency on Aging, Region X P.O. Box 3990/531 E. 15th St. Joplin, MO 64803 417-781-7562 Phone www.aaaregionx.org

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From:	Melinda Robertson <clerk@polkcountymo.org></clerk@polkcountymo.org>
Sent:	Monday, August 24, 2020 2:08 PM
То:	FSD CSBG Cares Public Comment
Subject:	RE: CARES Act funding - your comment is needed

I support a 200% eligibility guideline to be used in the CARES Act Funding Melinda

Melinda Robertson Polk County Clerk/Election Authority 102 E. Broadway, Rm #11 Bolivar, MO 65613 417-326-4031 417-326-3525 (fax) Email: clerk@polkcountymo.org

From: Susan Peden
Sent: Monday, August 24, 2020 1:59 PM
To: Ted Zeugin ; whitney.spiegel@citizensmemorial.com; Micah Titterington ; Melinda Robertson ; Carol Poindexter ; Shirley Allison ; Ronda Levy (ronda.levy@polkcountyhealth.org) ; dleith ; Danny Morrison
Subject: FW: CARES Act funding - your comment is needed

FYI

From: Lindsey Dumas-Bell
Sent: Monday, August 24, 2020 1:29 PM
To: Cassie Melvin <<u>cmelvin@oac.ac</u>>; NC - Barry <<u>barry@oac.ac</u>>; Christian NC <<u>christian@oac.ac</u>>; NC - Dade
<<u>dade@oac.ac</u>>; NC - Dallas <<u>dallas@oac.ac</u>>; NC - Greene <<u>greene@oac.ac</u>>; NC - Lawrence <<u>lawrence@oac.ac</u>>; NC Polk <<u>polk@oac.ac</u>>; NC - Stone <<u>stone@oac.ac</u>>; NC - Taney <<u>taney@oac.ac</u>>; NC - Webster <<u>webster@oac.ac</u>>;
Subject: CARES Act funding - your comment is needed

Hi. This was sent out to Area Board members whose emails I have. Lena is helping with the mailing for board members who don't use email. This needs to also be emailed to CAB members. Can you help with that? Thank you!

Hello. This email contains important information related to the people and communities we serve. Your support by public comment is urgently needed. Please share. Thank you.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act is an economic stimulus bill intended to provide fast and direct economic assistance for American workers and families. The CARES Act law allocated \$1 billion to the Community Services Block Grant (CSBG) program and left it up to the states to decide on the poverty guideline (125% or up to 200%) but the intent of the law was to provide emergency assistance for individuals, families and businesses affected by the 2020 coronavirus pandemic (COVID-19). Missouri left the poverty guideline at 125% in the proposed <u>CSBG CARES Act</u> <u>Supplemental State Plan (noted in Section 12, page 24).</u>

At OACAC, we firmly stand in support of a 200% income eligibility guideline and we ask for your support through public comment. Our CSBG Neighborhood/Community Centers program has been determined to be an eligible entity to receive funding under the CARES Act. At this time, the Missouri Department of Social Services is asking for public

comments on the proposed amendment to its State CSBG Plan for CARES Act funding. See below for instructions on how to comment.

The current 2020 poverty guidelines for the U.S. are:

- 125% Household Number 1 Annual \$15,950 (4 would be \$32,750)
- 200% Household Number 1 Annual \$25,520 (4 would be \$52,400)

A 200% eligibility guideline would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. Proposed uses include direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosure, transportation costs, mental health support, dental and vision costs, employment supplies such as technology and PPE, educational support, and food security assistance. OACAC will be receiving \$2,649,897 for its 10-county service area, to carry out eligible services over a two-year period.

We ask for you to show your support of a 200% eligibility guideline by providing feedback to the Department of Social Services by 5pm on Aug. 28, 2020. Comments may be submitted online to <u>CSBGCaresPublicComment@dss.mo.gov</u> or mailed to:

CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

The official notice, which includes a link to the amended CSBG CARES Act Supplemental State Plan, is attached. Please contact Lindsey Dumas-Bell, OACAC Resource Development Manager, with questions. Thank you.

Lindsey Dumas-Bell Resource Development Manager Ozarks Area Community Action Corporation (OACAC) (417) 873-3375 | website | facebook | twitter | pinterest Empowering people, enriching communities and alleviating the causes and conditions of poverty in SW MO.

From: Sent: To: Attachments: Long, Susan Monday, August 24, 2020 4:16 PM FSD CSBG Cares Public Comment CMCA letter.pdf **Osage County Health Department** 

205 E. Main Street, Linn, MO 65051 Ph: 573-897-3103; Fax: 573-897-4915

Missouri Department of Social Services CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

RE: CSBG CARES Act State Plan

To Whom It May Concern,

Thank you for the opportunity to provide public comment on the State of Missouri's plan for the CSBG funding available to the state through the CARES Act. The economic, emotional, physical and social impact that the Coronavirus pandemic has had on the citizens of Missouri has led to a devastating result for thousands of families.

Congress appropriated funding for CSBG to provide services for people earning up to 200% of the Federal Poverty Level. The Missouri Community Action Network has recommended that the 200% FPL be applied to the Missouri State Plan to be more responsive to people and communities feeling the effects of the COVID-19 pandemic. I (we) recommend that the eligibility level for those who can obtain services from Community Action Agencies be increased from 125% of the Federal poverty Level to 200%. Increasing the eligibility level of those who may benefit from the services this funding will provide has the opportunity to increase the flexibility of agencies like Central Missouri Community Action to assist those hardest hit by this pandemic

As you know, millions of Americans are applying for unemployment benefits, which is unlike anything our country has seen since the Great Depression. In fact, data shows that nearly one in four Americans in the labor force have filed for assistance. While unemployment benefits are available in each state, current Unemployment Insurance systems across the country are overwhelmed, making the process cumbersome and difficult to navigate. What we know from families coming to us for help is that even those who qualify have waited weeks to receive their first payment. They need financial support now to stay afloat but fall outside traditional 125% income guidelines that dictate who can receive services with CSBG funding.

Local businesses began furloughing and laying off staff months ago. The demand for products and services continues to decrease and more individuals and households fall victim to the income volatility created by COVID-19. Most of them need assistance and resources, possibly for the very first time in their lives. Typically, families asking for assistance for the first time are often above the 125% FPL currently in place. By expanding eligibility to 200% FPL, more Missourians will receive the benefits they so desperately need at an unprecedented time in our nation's history.



. . . . . .

Further, there are hundreds of thousands of low-wage earners continue reporting to work as they are deemed essential. Like those who are recently unemployed due to the pandemic, essential workers also need support from Community Action Agencies. A recent study from the Missouri Budget Project highlights key demographics and needs of Missouri's essential workforce. According to the study, Missouri's frontline workers are disproportionately likely to be living in poverty or near poverty. In many cases, these workers are living paycheck to paycheck, leaving them at risk for serious financial hardship if exposed to COVID-19particularly if they are also uninsured. This is just one critical finding from the study, which can be accessed here: https://www.mobudget.org/mo-essential-workforce/.

By increasing the income guideline to 200% FPL, Community Action Agencies will be able to serve a greater number of community members, which in turn will spur a quicker recovery by helping these families weather the financial crisis, but also injecting nearly \$27 million in revenue into Missouri's local economies through benefits provided to citizens, job creation, and leveraged funds or services that support local businesses and other non-profits.

Congress has created parameters that offer great flexibility to serve the broadest population possible and we believe that limiting these parameters run counter to that intent. It is for these reasons we ask that you increase the income guideline to 200% of the FPL. Doing so will leverage the experience, resources, and infrastructure of Missouri's Community Action Agencies to deliver the services Missourians need now more than ever.

Respectfully,

Susan Long, RN, BSN

Administrator



Public Health Prevent, Promote, Protect Services provided on a nondiscriminatory basis

From: Sent: To: Missey, Rebecca <rmissey@eastmoaa.org> Monday, August 24, 2020 5:47 PM FSD CSBG Cares Public Comment

I agree with this we need this support and funding, I work for a Headstart. This would be so good for our community...

From:	
Sent:	
To:	

Killian, Renee <rkillian@eastmoaa.org> Monday, August 24, 2020 1:32 PM FSD CSBG Cares Public Comment

I wish to see the poverty guidelines increased to serve 200% of the poverty guidelines. Many families have been hit hard financially by the COVID-19 virus. This has been a very taxing year on our community and if this is increased we will be able to serve more people in need.

Thank you for your attention to this matter.

Renee Killian EMAA Head Start Director

From:	Hall, Patti <phall@eastmoaa.org></phall@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 8:34 AM
То:	FSD CSBG Cares Public Comment
Subject:	200% ELIGIBILITY GUIDELINE

I am in support of the 200% eligibility guidelines.

Thank you,

Pattí

Patti Hall, Financial Specialist East Missouri Action Agency, Inc. 403 Parkway Drive P.O. Box 308 Park Hills, MO 63601 Phone: (573) 431-5191x1102 Fax: (573) 431-6773

# Please consider the environment before printing this email

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From: Sent: To: Subject: Cyndi Crews <cyndi26crews@gmail.com> Tuesday, August 25, 2020 9:13 AM FSD CSBG Cares Public Comment 200% Eligibility

I am in support of the 200% eligibility and hope you seriously consider increasing your current stance from 125% to the 200%. Although I do not have the stats, I understand many families, especially due to COVID, make just over the 125% which disqualifies the family for "hand up" they are in need of. Thank you in advance for your consideration!

Sincerely, Cyndi Crews

From:	Dawn Vance <dawnvance@hotmail.com></dawnvance@hotmail.com>
Sent:	Tuesday, August 25, 2020 9:35 AM
То:	FSD CSBG Cares Public Comment
Subject:	200% of the poverty guideline

I support making CSBG 200% of the poverty guideline. I live in Washington County, Missouri.

Thank you.

Dawn Vance

From: Sent: To: Subject: Voyles, Candace <cvoyles@eastmoaa.org> Tuesday, August 25, 2020 9:02 AM FSD CSBG Cares Public Comment 200%

Hello! I work for EMAA head start as a degreed teacher. I often take applications for children who fall short of the eligibility criteria based on income but could still very much benefit from our program. I fully support a 200% eligibility guideline so that we are able to better serve our community! Thanks so much for your time.

Candace Voyles Farmington 2 Head Start

From:	Murray, Shannon <smurray@eastmoaa.org></smurray@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 7:41 AM
То:	FSD CSBG Cares Public Comment
Subject:	Care Act Funding.

The current 2020 poverty guidelines for the U.S. are:

- 125% Household Number 1 Annual \$15,950 (4 would be \$32,750)
- 200% Household Number 1 Annual \$25,520 (4 would be \$52,400)

A 200% eligibility guideline would allow EMAA to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. Proposed uses include direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosure, home care assistance, and food security assistance. EMAA will be receiving \$1,177,005 for its 8-county service area, to carry out eligible services over a two-year period.

In 2019, EMAA had nearly 1,600 families seek services that did not qualify for CSBG services. Since October 1, 2020, EMAA has had nearly 1,500 families seeking services who do not qualify. We believe families falling between the 125% and 200% of poverty have been hit the hardest during this pandemic. The purposes of the CSBG Cares Act fund are meant to reach families who have been severely impacted by the effects of COVID-19. Families who were working and have been laid off, and those who may have assets and will not qualify for government assistance are the families in which these funds are to help. Thank you for your time.

<u>Shannon Murray</u> <u>Community Services</u> East Missouri Action Agency

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From:	Maura Taylor <mtaylor@ccsomo.org></mtaylor@ccsomo.org>
Sent:	Tuesday, August 25, 2020 3:59 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Act funding.

Missouri households have been impacted by the pandemic and many need financial assistance due to loss of work, a reduction in hours, business closures, etc. Many of these households have never sought or needed to utilize services prior to COVID. In order to serve a wider group of individuals and families who are struggling and unable to pay rent and/or mortgages and who may also need additional direct services, I am requesting that the state consider raising the eligibility guidelines to 200% of Poverty.

The current 2020 poverty guidelines for the U.S. are:

- 125% Household Number 1 Annual \$15,950 (4 would be \$32,750)
- 200% Household Number 1 Annual \$25,520 (4 would be \$52,400)

As a provider of social services in the thirty-nine southernmost counties in Missouri, we are receiving calls from families who have no where to turn, and who before the pandemic were able to pay their bills. Now after months of layoffs, furloughs and reduction in work hours, they are faced with large arrears and are at risk of eviction or foreclosure. By raising the eligibility guidelines, the state can help these households achieve stability.

Thank you. Maura Taylor

Maura Taylor Executive Director Catholic Charities of Southern Missouri 424 E. Monastery St. | Springfield, MO 65807 Phone (417) 720-4213 ext:104 Cell (417) 413-9790 | Fax (417) 720-4216 Email: <u>mtaylor@ccsomo.org</u> Https://www.ccsomo.org



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Amanda Baker <amanda_jo@hotmail.com></amanda_jo@hotmail.com>
Tuesday, August 25, 2020 3:25 PM
FSD CSBG Cares Public Comment
CARES Act Funding

#### Good Afternoon,

I am writing in support of increasing the eligibility threshold of the CSBG Cares funding from 125% to 200% of the Federal Poverty Guideline. In April our organization sent out a survey asking members of the communities what their concerns were for themselves and families at that time regarding the effects of COVID-19, what their concerns were for their community, and what their concerns were when the pandemic was over. We received over 500 responses to the short survey. Of those, we received comments from a variety of individuals who were very concerned with how they will pay their bills when their hours were cut, and small business owners who didn't receive an income while their doors were closed.

We have seen many families who are now in a serious bind as they are receiving shut-off notices for their utilities that they couldn't pay, or didn't pay so they could take advantage of getting caught up on other bills. We heard of many concerns about loss of childcare, which resulted in people losing their jobs or having to reduce hours. One comment we received said:

"I tried to answer best as I could but really unemployment due to schools out (didnt need childcare before with school after school sitter) this effects being able to pay bills- rent/utilities all these effect each other so same high on list."

#### Another comment from another service provider said:

"Am working right now with people with food insecurities, inability to obtain diapers, layoffs that are messing with ability to pay utilities, domestic violence and inability to get away from person responsible because the person lives in the household"

#### One comment that really stuck out to me was this:

"Both of us work part-time; had another side-biz, but it tanked a month ago b/c of COVID-19. Concerned about paying utility bills now & later d/t the lost income. We've been called "cliff hangers" we usually don't qualify for help, but it sure would be nice if we did."

I could go on, but these three comments alone, in my opinion, represent many hard-working individuals in our communities who make "too much" to receive assistance, such as SNAP, Medicaid, LIHEAP, etc., yet are still living on unstable ground. They are getting by for now with most of their needs being met, but aren't prepared for a crisis, such as a pandemic that may send them into a real crisis. Most of the individuals I am speaking of have regained employment or are slowly getting back on their feet, but are still knee-deep in unchartered territory, trying to figure out how to get out of the mess they have found themselves in. Because they have regained employment or their hours have gone back to normal, they now make "too much" money because on paper they are over the 125% eligibility threshold. While I completely understand the funding must have a cap at some point, I do think this is a great opportunity for the State of Missouri to expand its reach *just a little bit* and help the people falling through the cracks right before our eyes.

Thank you for your time and consideration.

Amanda Baker-Schull, CNP

From:	sandy dye <smtbp@outlook.com></smtbp@outlook.com>
Sent:	Tuesday, August 25, 2020 12:07 PM
То:	FSD CSBG Cares Public Comment
Subject:	Cares act I'd believe we need to put at the 200%

Cause there's more people needs help and only right thing to do sandy Dye

Sent from my Verizon, Samsung Galaxy smartphone

From:	Luann Honerkamp <lhon@live.com></lhon@live.com>
Sent:	Tuesday, August 25, 2020 1:54 PM
То:	FSD CSBG Cares Public Comment
Subject:	Cares Comment
Attachments:	CARES comment letter.docx

To whom it may concern,

Please see the attached letter with information regarding the Cares Act Funding.

Blessings, Luann



## East Missouri Action Agency Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape Girardeau, Iron, Madison, Perry, Ste. Genevieve, St. Francois and Washington.

As an organization that serves and advocates for low-income Missourians, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the income eligibility threshold for services.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Sincerely,

Luann Honerkamp Hope 4 Autism 117 E Columbia Street Farmington (573) 664-1711 Luann@hope4autism.org

From: Sent: To: Subject: Lincoln, Kathleen <klincoln@eastmoaa.org> Tuesday, August 25, 2020 9:01 AM FSD CSBG Cares Public Comment Comment

## Kathleen Lincoln Comments CSBG CARES Act Funding State Plan Amendment

[CAA} is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: As an organization (or individual Supporter of CAA) that/who serves and advocates for low-income Missourians, we are/I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

• For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.

• Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.

• Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.

• To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Sincerely, Kathleen Lincoln 573-431-5191 Ext.1113

Katie Lincoln

From:	Yount, Shanna <syount@eastmoaa.org></syount@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 8:56 AM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES Act Funding Comments
Attachments:	image001.png; Agency or Stakeholder Comments_State CSBG Plan Amendment_August
	2020 (1).docx

Please see the attached letter.

Thank You.

#### Shanna

Shanna Yount, NCRI Program Coordinator East Missouri Action Agency, Inc. 403 Parkway Dr. Park Hills, MO 63601 <u>573-431-5191 Ext.</u>1137 <u>573-431-7377</u> Fax



#### EMAA will leverage all community resources to support individuals in reaching their highest potential.

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## Shanna Yount Comments CSBG CARES Act Funding State Plan Amendment

[CAA] is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: As an organization (or individual Supporter of CAA) that/who serves and advocates for low-income Missourians, we are/I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.
- information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area.

Sincerely,

Shanna Yount syount@eastmoaa.org (573)210-1521

From:	Tonya Hinch <tontonrae@gmail.com></tontonrae@gmail.com>
Sent:	Tuesday, August 25, 2020 10:28 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG Cares Public comment

-Missouri should raise the income level to 200%. Working individuals & families have been hit the hardest by this pandemic. Many are over the 125% levels but still do not make enough to climb out of the messes COVID-19 has caused. With Missouri cases increasing and businesses suffering, Missouri must be responsible with funding and support more than just the lowest incomes this time. Unemployed/retired fixed income families have had no income change due to the pandemic. Please help those who are actually losing income.

From: Sent: To: Subject: Hall, Patti <phall@eastmoaa.org> Tuesday, August 25, 2020 8:52 AM FSD CSBG Cares Public Comment CSBG Cares

### **Patricia Hall: Comments**

### **CSBG CARES Act Funding State Plan Amendment**

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

• For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.

• Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.

• Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.

• To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

<u>Discretionary CSBG Funds</u> (Agencies and Individuals can omit this section if desired OR expand on why TTA is so important during this time)

• Upon review of the state plan amendment, it appears that little information is provided about how CARES Act and regular CSBG funding will be utilized in relation to discretionary providers for Training and Technical Assistance to Missouri's Community Action Agencies, which is so desperately needed during this crisis. For example, sections 7.6 and 8.1 include limited information about use of Training and Technical Assistance dollars. Section 14.2, though not required to be completed by the Office of Community Services, does not describe how the State of Missouri plans to use discretionary funds. And page 33, which includes a reference to state use of discretionary funds, indicates that information is found in sections 7.9 and 7.10 of the state plan; sections 7.9 and 7.10 are not fully outlined in the amendment. With limited information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area.

Sincerely, Patricia Hall phall@eastmoaa.org

East Missouri Action Agency, Inc.

403 Parkway Drive P.O. Box 308 Park Hills, MO 63601 Phone: (573) 431-5191x1102 Fax: (573) 431-6773

### Please consider the environment before printing this email

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From:	Micah Titterington <micaht@bolivarcom.org></micaht@bolivarcom.org>
Sent:	Tuesday, August 25, 2020 8:32 AM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG public comment

To whom it may concern:

I am writing to express my concern over Missouri's current plan to limit use of CARES Act CSBG funds to only families that are under 125% of the federal poverty level. I am the Executive Director of a food pantry in rural, southwest Missouri. My agency does not currently receive any CSBG funds, but partner with other agencies that do. At our food pantry, we serve families who make up to 200% of the federal poverty level because we recognize that many families fall into an awkward situation where they make too much for government benefits or assistance but still do not make enough to make ends meet. This is especially true right now with the pandemic as many people may suddenly be laid off or are floating from temporary job to temporary job.

In my opinion, the wisest course of action would be to expand the income limits to 200%. The majority of families assisted would likely still be under 125% of FPL, but expanding the limits to 200% would give agencies the flexibility to also be able to assist families whose income is just over 125%, which is a scenario that happens frequently at agencies like mine.



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From:	Jones, Bob <rjones@springfieldmo.gov></rjones@springfieldmo.gov>
Sent:	Tuesday, August 25, 2020 9:21 AM
То:	FSD CSBG Cares Public Comment
Subject:	DSS CSBG CARES Act Supplemental State Plancomment on Section 12: Individual
	Income Eligibility

To whom it may concern:

#### I respectfully request that the Required Income Eligibility (section 12.1) be 200% of the HHS poverty line.

This comes as Springfield is experiencing devastating impact from the COVID emergency that has affected our employed citizens as well as the very-low income families. Many of those in the 125% to 200% income strata have not been accustomed to receiving any other aid for which only the very-low income households qualify. There is a gap that has been created with business closures, daycare restrictions, and health issues that have sidelined them from receiving regular income. Most do not have any sizable "emergency fund" that can carry them through an extended recovery period. They are willing workers that sustain a viable business community when it is fully operational and need this temporary gap-funding now too.

The increase will allow OACAC to assist them as well as those below the 200% level.

Thanks you for your consideration of this request.

Bob Jones Grants Administrator

Planning and Development Dept 417-864-1593 rjones@springfieldmo.gov

From:	Diggs, Jane <jdiggs@eastmoaa.org></jdiggs@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 8:09 AM
То:	FSD CSBG Cares Public Comment
Subject:	East Missouri Action Agency

### Concerning the Coronavirus Aid, Relief, and Economic Security (CARES) ACT:

At EMAA, we firmly stand in support of a 200% income eligibility guideline and we ask for your support through public comment. These funds directly impact our Community Services Department. At this time, the Missouri Department of Social Services is asking for public comments on the proposed amendment to its State CSBG Plan for CARES Act funding. See below for instructions on how to comment.

The current 2020 poverty guidelines for the U.S. are:

- 125% Household Number 1 Annual \$15,950 (4 would be \$32,750)
- 200% Household Number 1 Annual \$25,520 (4 would be \$52,400)

A 200% eligibility guideline would allow EMAA to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. Proposed uses include direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosure, home care assistance, and food security assistance. EMAA will be receiving \$1,177,005 for its 8-county service area, to carry out eligible services over a two-year period.

In 2019, EMAA had nearly 1,600 families seek services that did not qualify for CSBG services. Since October 1, 2020, EMAA has had nearly 1,500 families seeking services who do not qualify. We believe families falling between the 125% and 200% of poverty have been hit the hardest during this pandemic. The purposes of the CSBG Cares Act fund are meant to reach families who have been severely impacted by the effects of COVID-19. Families who were working and have been laid off, and those who may have assets and will not qualify for government assistance are the families in which these funds are to help.

Jane Diggs

Jane Diggs

Area Support Assistant

East Missouri Action Agency, Inc.

1111 Linden St.

Cape Girardeau, Mo. 63701

573-431-5191 ext. 2201

If a free society cannot help the many who are poor, it cannot save the few who are rich. John F. Kennedy.

From:	Mack, Carol <cmack@eastmoaa.org></cmack@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 8:22 AM
То:	FSD CSBG Cares Public Comment
Subject:	eligibility guidelines

Good Day..I am contacting you because I am in total support of a 200% poverty guideline. This guideline would help local agencies support more families, families that sometimes fall between the cracks. Thank you for taking my support into consideration, Sincerely,

Carol Mack, Head Start Teacher

From:	Linda Dickerson-Bell <lindadickerson@hotmail.com></lindadickerson@hotmail.com>
Sent:	Tuesday, August 25, 2020 5:38 PM
То:	FSD CSBG Cares Public Comment
Subject:	Fw: Public Comment for EMAA 200% Poverty Guidelines
Attachments:	EMAA 200 percent Support Letter.pdf

Please see attached the letter of Support for EMAA in serving families who meet up to the 200% poverty level.

Thanks,

Linda Dickerson-Bell Executive Director Habitat for Humanity of St. Francois County, Inc.

# East Missouri Action Agency Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape Girardeau, Iron, Madison, Perry, Ste. Genevieve, St. Francois and Washington.

As an organization and Supporter of CAA who serves and advocates for low-income Missourians, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the income eligibility threshold for services.

# Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Sincerely Linda Dickerson-Bel

Executive Director Habitat for Humanity of St. Francois County, Inc. PO Bo 743 Farmington, MO 63640 573-330-2436

From:	Don Currence <dcurrence@fbcozark.org></dcurrence@fbcozark.org>
Sent:	Tuesday, August 25, 2020 3:49 PM
То:	FSD CSBG Cares Public Comment
Subject:	I support a 200% eligibility guideline to the CSBG CARES Act Supplemental State Plan

#### **ATTENTION:**

CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

I support a 200% eligibility guideline instead of the 125% eligibility guideline as being proposed in the following statement. If left at 125%, many needed families would be unable to receive needed assistance in this trying time.

"The Coronavirus Aid, Relief, and Economic Security (CARES) Act is an economic stimulus bill intended to provide fast and direct economic assistance for American workers and families. The CARES Act law allocated \$1 billion to the Community Services Block Grant (CSBG) program and left it up to the states to decide on the poverty guideline (125% or up to 200%) but the intent of the law was to provide emergency assistance for individuals, families and businesses affected by the 2020 coronavirus pandemic (COVID-19). Missouri left the poverty guideline at 125% in the proposed <u>CSBG CARES Act</u> <u>Supplemental State Plan (noted in Section 12, page 24).</u>"

Thank you for your time in this consideration.

Don Currence Chairman, Christin County OACAC Board

Don Currence *Administrative Pastor First Baptist Church 1400 W. Jackson Street Ozark, MO 65721* 

Office: 417-581-5225 Cell: 417-849-1693 Fax: 417-581-2236

From:	Umfleet, Deborah <dumfleet@eastmoaa.org></dumfleet@eastmoaa.org>
Sent:	Tuesday, August 25, 2020 5:14 PM
То:	FSD CSBG Cares Public Comment
Subject:	Poverty guidelines

I definitely feel that the poverty guidelines need to be increased. I am a Family Advocate for Head Start and take many applications for our program. I feel that many children and their families are denied attending Head Start for being over income by a very small amount. The income guidelines are ridiculously low and should be updated and increased. I have worked for Head Start for 31 years and love the program, but we need adjustments to the income guidelines.

Thank you, Debbie Umfleet EMAA Farmington 2 Head Start

From:	Tonya Guzman <tonyar232@gmail.com></tonyar232@gmail.com>
Sent:	Tuesday, August 25, 2020 10:13 PM
То:	FSD CSBG Cares Public Comment
Subject:	Raising eligibility to 200%

Hi I am writing this in response to raising the eligibility guidelines to 200%. So many are losing their jobs due to COVID 19. Some are having to leave their jobs for health reasons due to COVID 19. I am asking that you think of the Missouri people and make this happen.

Thank you for your time

From:Coleman, Andrea <acoleman@eastmoaa.org>Sent:Tuesday, August 25, 2020 9:06 AMTo:FSD CSBG Cares Public CommentAttachments:Agency or Stakeholder Comments\_State CSBG Plan Amendment\_August 2020 (1).docx

--Sincerely,

Andrea Coleman

Greenhouse Manager Grassroots Greenhouse East Missouri Action Agency 403 Parkway Drive Park Hills, MO 63601 (573) 431-5191 ext. 1126 (573) 210-7852 (Cell)



"A garden requires patient labor and attention. Plants do not grow merely to satisfy ambitions or to fulfill good intentions. They thrive because someone expended effort on them." ~ Liberty Hyde Bailey

# Andrea Coleman Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Washington, St. Francois, Cape, Iron, Madison, Perry, Bollinger and Ste. Genevieve. As an individual Supporter of EMAA who serves and advocates for low-income Missourians, I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of EMAA to deliver the services our region needs now more than ever.
- information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area.

Sincerely,

Andrea Coleman 573-431-5191 ext. 1126

From:	
Sent:	
To:	
Subject:	

mikeandlorimeyer <mikeandlorimeyer@yahoo.com> Wednesday, August 26, 2020 5:01 PM FSD CSBG Cares Public Comment CARES Act Funding

Families are in of this act, to help catch up, to help plan for the future. Not only that, but please consider how most families didn't even get to use their taxes on much needed things, such as taxes or dentures, because those funds were needed to pay for bills, while hours were reduced or laid off altogether. There are so many who are barely making ends meet. The food stamp program helps, but vehicle and home companies are no longer as patient as when this first started. Thanks for listening!

Sent from my Samsung Galaxy smartphone.

From:	David Suits <davidsuits25@gmail.com></davidsuits25@gmail.com>
Sent:	Wednesday, August 26, 2020 11:01 AM
То:	FSD CSBG Cares Public Comment
Subject:	CARES Comments

To Whom It May Concern,

In my limited understanding of the CARE funding, it was much needed and has been, since before the COVID pandemic. I am so grateful for the injection of funds at this critical time into our community. For too long our state government and now federal government have done little to help those of us that are poor, sick and homeless. Some say that when the government becomes involved with communities it is too much of an over-reach, but I do not agree with this point of view. When money is involved we will always need oversight of some kind.

I would not mind paying more taxes if I knew that my/our money was going to provide for those disenfranchised among us that don't vote because they don't see the point, can't because of bureaucratic misdirections, such as the straw dog of voter fraud/voter identification or they continue to experience forms of voter suppression, including the confusing issue of mail-in ballots and loss of voting location opportunities. I know that voting on issues is how money, through our taxes, and our representation in Jefferson City and Washington D.C., is how the taxes are used, but I still don't agree with the various discriminating administrative guidelines and actions or the means of obtaining voters votes.

CARE funding has been critical and so far, the financial oversight of the program seems to be in place and I am grateful for that. Agencies are being held accountable and making every effort to be transparent and clear about their allocations. I would like to see this kind of funding be made more permanent. This is the first time our government has made any such gesture and I would like to see it continue.

Thank you so much for this opportunity to speak out.

Sincerely,

David Suits Vietnam veteran Retired elementary school counselor

From:	jessica.herwig@macprc.com
Sent:	Wednesday, August 26, 2020 10:37 AM
То:	FSD CSBG Cares Public Comment
Cc:	Semar, Janine
Subject:	Cares Public Comment
Attachments:	CARES Comment Letter MACPRC.pdf

Hello please see attached.

Thanks,

#### Jessica Herwig, MBA

**Corporate Compliance Director** 

Mineral Area CPRC, Inc.

560 West Pine Street

P.O. Box 510

Farmington, MO 63640

Work: 573-756-2899 ext. 123

Fax: 573-664-1685

Email: jessica.herwig@macprc.com

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# Mineral Area CPRC Comments CSBG CARES Act Funding State Plan Amendment

Mineral Area CPRC is an adult community psychiatric rehabilitation that serves St. Francois County, MO.

As an organization that/who serves and advocates for low-income Missourians, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the income eligibility threshold for services.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Sincerely,

Vicky Winick, CCDP-D, LMSW, LNHA, Email: <u>Vicky.Winick@macprc.com</u> Phone: (573)756-2899 ext. 122 Address: Mineral Area CPRC Inc. ATTN: Vicky Winick P.O. Box 510 Farmington, MO 63640

From:	Carol Poindexter <recorder@polkcountymo.org></recorder@polkcountymo.org>
Sent:	Wednesday, August 26, 2020 1:46 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES ACT 200% poverty guideline support

I am an OACAC board member from Polk County. I would like to ask that you raise the poverty guideline to 200%.

There is an increase in the number of people needing help due to COVID. Part of this increase are families who have

never had to ask for help. I understand that the State of Missouri will decide on the guideline and has left that guideline

at 125%. In this uncertain time stress levels are at an all-time high. OACAC is seeing more people who have lost jobs,

have no childcare, in danger of losing everything they have, and can't feed their families. If OACAC could serve more

people that are barely getting by, and show them that someone does care, our chances for a brighter future are much better.

Thank you, Carol Poindexter

From:	Jennifer Olson <jolson@oac.ac></jolson@oac.ac>
Sent:	Wednesday, August 26, 2020 9:13 AM
То:	FSD CSBG Cares Public Comment
Cc:	Carl Rosenkranz; Skylar Walker; Lindsey Dumas-Bell
Subject:	CSBG CARES Act Supplemental State Plan, Page 24, OACAC Board Resolution
Attachments:	08.25.20 OACAC Board Resolution.pdf

Please respectfully accept the attached Board Resolution as a public comment from the OACAC Board of Directors. This resolution, passed on 08.25.20, advocates for the State of Missouri to increase the income eligibility to 200% in the CSBG CARES Act Supplemental State Plan, as noted on page 24 of the plan. Thank you.

Jennifer Olson CSBG Director 215 S. Barnes Springfield, MO 65802 Ph: (417) 873-3381

#### OACAC Greene County Supervisor

560-A North Stewart Springfield, MO 65802 Ph: (417) 447-0554 Fax: (417) 832-0303

http://oac.ac/



# Ozarks Area Community Action Corporation Carl Rosenkranz, Executive Director

215 S, Barnes Avenue Springfield, MO 65802-2204 Office: 417-862-4314 | Fax: 417-864-3499 www.oac.ac

# AUGUST 25, 2020 OZARKS AREA COMMUNITY ACTION CORPORATION BOARD OF DIRECTORS RESOLUTION IN SUPPORT OF A 200% INCOME GUIDELINE IN THE CSBG CARES ACT SUPPLEMENTAL STATE PLAN (SEE PAGE 24)

The Ozarks Area Community Action Corporation (OACAC) operates the Community Services Block Grant (CSBG) Neighborhood/Community Centers program in its ten county service area in Southwest Missouri. OACAC is an eligible entity to receive funding under the Coronavirus Aid, Relief, and Economic Security (CARES) Act legislation. The CARES Act law allocated \$1 billion to the CSBG program and left it up to the states to decide on the poverty guideline (125% or up to 200%) but the intent of the law is to provide emergency assistance for individuals, families and businesses affected by the 2020 coronavirus pandemic (COVID-19). The State of Missouri left the poverty guideline at 125% in the proposed CSBG CARES Act Supplemental State Plan, noted in Section 12, page 24.

OACAC's mission is to enrich the lives of families and individuals within our communities by providing opportunities, offering assistance and empowering people to make positive change and the CSBG program provides a variety of services for low-income people to empower them in their goals to self-sufficiency and improved quality of life.

A 200% CSBG income eligibility guideline would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. OACAC's CSBG Program will be receiving \$2,649,897 for its 10-county service area, to carry out eligible services over a two-year period. Proposed uses of CARES Act funding include direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosure, transportation costs, mental health support, dental and vision costs, employment supplies such as technology and PPE, educational support, and food security assistance.

If the income eligibility guideline is not increased to 200%, people, whose lives have been critically affected by COVID-19, will be unnecessarily placed in challenging positions regarding the need to do more with fewer resources. During an August 18, 2020 meeting, OACAC CSBG Neighborhood/Community Center field staff provided this feedback regarding the importance of a 200% income eligibility:

County staff are seeing a large increase in families that have never asked for help and a wide range of jobs impacted by COVID-19. These families are new to job loss and don't know where to turn. Many of these families do not qualify at 125%.

The moratorium on evictions was only a reprieve for those with certain funding sources for their housing assistance; those that are already considered low-income. It did not apply to private landlords in most cases. Those who earn too much to be considered low-income to qualify for housing programs that benefited from

Family Planning | Foster Grandparents | Head Start/Early Head Start | Housing Assistance Low-Income Home Energy Assistance Program | Neighborhood Centers | Weatherization Assistance

Serving Ten Counties: Barry | Christian | Dade | Dallas | Greene | Lawrence | Polk | Stone | Taney | Webster Equal Opportunity Employer. All services provided on a non-discriminatory basis. the moratorium have received no support or assistance. These likely would be people in the 126%-200% income bracket.

County staff report serving people in tears that have cashed in their 401K accounts and savings, and still find themselves facing foreclosure. Mortgages are more likely to be carried by those above 125%.

One family made twenty-seven dollars too much to qualify for any help. If they missed a day of work they would qualify, but otherwise they are stuck with no assistance to help them.

The OACAC Board of Directors firmly stands in support of the State of Missouri adopting a 200% poverty income guideline for their CSBG CARES Act Supplemental State Plan.

This Board Resolution was adopted at a regular meeting of the Ozarks Area Community Action Corporation's Board of Directors on Tuesday, August 25, 2020 and is signed by the Board President on behalf of the OACAC Board of Directors.

Dave O'Dell, OACAC Board President

Family Planning | Foster Grandparents | Head Start/Early Head Start | Housing Assistance Low-Income Home Energy Assistance Program | Neighborhood Centers | Weatherization Assistance

From:	Jennifer Olson <jolson@oac.ac></jolson@oac.ac>
Sent:	Wednesday, August 26, 2020 10:26 AM
То:	FSD CSBG Cares Public Comment
Cc:	Carl Rosenkranz
Subject:	CSBG CARES Act Supplemental State Plan, Page 24

Please respectfully accept this comment as one in support of increasing the poverty percentage income eligibility as noted in Section 12, Page 24 of the Missouri CSBG Cares Act Supplemental State Plan.

I often find that the best resources for making such a decision come from those staff on the front lines and in the field. I've reached out to OACAC CSBG field staff throughout the ten county service area and asked them to provide me with some of their observations. Over our 10-County service area, OACAC field staff report the following:

- Estimated number calls from families and individuals seeking assistance each week: 670
- Of the estimated number of calls for assistance, percentage that are families/individuals expressing the sentiment that they have never sought assistance before: 41%
- Of the estimated number of calls for assistance, percentage that state COVID-19 as a reason for seeking assistance: 37%

In addition to this, field staff are reporting that one of the primary safety nets designed under the CARES Act to reach those negatively impacted by the pandemic, simply has not worked. Those families and individuals who lost earned income during the pandemic were approved under the legislation to receive \$600/week in additional unemployment compensation. However, we have seen, anecdotally, that this simply did not happen for many families. Field staff report that some families and individuals seeking assistance are still waiting for payment and have no way to contact a live person to discuss the delay. Some have tried to call state offices for assistance, only to have their phone disconnect after being on hold for too long of a period of time. Some families have had missing payments, even though they have been approved. Other families and individuals have not qualified under their self-employment or otherwise. These reports from those seeking assistance seem to be backed by this report from the *St. Louis Post-Dispatch* on the issue.

Families are across the economic spectrum are not prepared for the emergencies that may arise as a result of the pandemic. The <u>COVID Impact Survey</u> conducted by NORC at the University of Chicago, on behalf of the Data Foundation, (Abigail Wozniak, Joe Willey, Jennifer Benz, and Nick Hart. COVID Impact Survey: Version 2 [dataset]. Chicago, IL: National Opinion Research Center, 2020.) recently published their data from week 3 of their survey (06.01.20-06.08.20). In the summary they state:

Household security measures continue to suggest ongoing challenges faced by many across the country. A total of 14 percent of households indicate they would not be able to cover an unexpected \$400 expense, slightly below the 16 percent in May. The change from April and May is relatively modest, despite federal economic stimulus funds for households.

Further information from that survey revealed the following answers when asked, "Suppose that you have an unexpected expense that costs \$400. Based on your current financial situation, how would you pay for this expense? If you would use more than one method to cover this expense, please select all that apply."

- Put it on my credit card and pay for it over time=18%
- Borrow from a friend or family member=10%
- Use a payday loan, deposit advance or overdraft=2%
- Sell something=8%

The *COVID Impact Survey* chose Missouri as an area for a regional study. The most recent data is from week 3 findings, 05.30.20-06.08.20. The following question was asked of respondents, "Suppose that you have an unexpected expense

that costs \$400. Based on your current financial situation, how would you pay for this expense? If you would use more than one method to cover this expense, please select all that apply." Results included:

- I would not be able to pay it right now=22%
- Put it on my credit card and pay for it over time=22%
- Borrow from a friend or family member=6%
- Use a payday loan, deposit advance, or overdraft=3%
- Sell something=7%

The Centers for Disease Control (CDC) has noted this survey in its blog post entitled <u>Economic Security During the COVID-</u> <u>19 Pandemic: A Healthy Work Design and Well-Being Perspective</u>. In this post, the CDC writes about how employment has changed through the pandemic and how those with moderate incomes may be disproportionally impacted.

During this pandemic, the economic security of millions of workers and their families continues to be severely affected through the temporary or permanent loss of jobs and the related loss of income and access to benefits. Millions of workers have filed for unemployment insurance benefits, and there may be many more unemployed or underemployed workers who haven't filed. Many of the newly unemployed may not be seeking work due to the lack of job openings or because they hope to return to their previous jobs. Some workers may not file for unemployment benefits because they find the process daunting, slow, or uncertain. In addition, some of those who are currently working may eventually end up losing their jobs because they work for businesses affected by the pandemic. With fewer customers and reduced revenue, businesses may have to close or reduce their number of workers despite the economy reopening. In addition to losing their jobs, newly unemployed workers who had employer-sponsored health coverage will have to continue their coverage by paying the full premium unless they become eligible for other coverage (e.g., through Medicaid). After unemployment benefits end, <u>coverage options</u> become more limited.

Of those who continue to work during the pandemic, many are unable to work remotely. This distinction has health, social, and economic implications. Those working remotely are less exposed to infection, better able to preserve their economic security, and already earning more than those who are unable to work remotely. During April and May 2020, 57% of those in households earning more than \$125,000 per year reported working remotely, only 19% of those in households earning less than \$60,000 per year reported having this ability.

OACAC's Greene County Center has a partnership with the Springfield-Greene County Health Department Through the partnership, Health Department employees send referrals of families that have tested positive and/or are in quarantine and facing a financial crisis. It is estimated that 25% of the referrals received are families that are over-income at the current 125%. OACAC staff are limited in the help they can provide these families through non-CSBG funding. Expansion of the income eligibility would help these families to have assistance with their basic needs. The faces behind these numbers tell a story of families that need the help. There is a family that includes a husband that has been hospitalized since August 3<sup>rd</sup> and wife who has had to both quarantine and both cut hours at her retail job. They lack adequate insurance and the hospital bills continue to grow. They are over-income at the current guidelines, but still under 200%. There is a single mom who has worked hard to build a life for her family at a job that pays a living wage and has never sought assistance. Three months into her diagnosis she is still unable to resume full-time hours. Again, the family is over-income at current guidelines, but still under 200%. She is experiencing a decrease in pay, yet her living costs (rent, car payments, etc) still remain the same and well within her capabilities pre-COVID. This <u>Washington Post article</u> highlights more of these anecdotal stories seen around the country, and even includes one from Springfield, Missouri.

For these reasons stated in this email, I am asking you reconsider the income eligibility guideline as determined on page 24 of your Plan. I ask that you amend the plan to include income eligibility up to 200%.

#### Jennifer Olson

**CSBG** Director

215 S. Barnes Springfield, MO 65802 Ph: (417) 873-3381

#### **OACAC Greene County Supervisor**

560-A North Stewart Springfield, MO 65802 Ph: (417) 447-0554 Fax: (417) 832-0303

http://oac.ac/

From:	Jennifer Olson <jolson@oac.ac></jolson@oac.ac>
Sent:	Wednesday, August 26, 2020 9:51 AM
То:	FSD CSBG Cares Public Comment
Cc:	Carl Rosenkranz; Skylar Walker; Lindsey Dumas-Bell
Subject:	CSBG CARES Act Supplemental State Plan, Page 24

#### **CARES Act Income Eligibility**

The following information was obtained from OACAC CSBG field staff during a meeting held on 08.18.20. Field staff were asked to give their thoughts on income eligibility for CARES Act funding. OACAC CSBG staff would like to advocate for increasing the income eligibility as stated on page 24 to 200%. This is a summary of their comments.

- Counties are seeing a large increase in families that have never asked for help and a wide range of jobs impacted by COVID-19. These families are new to job loss and don't know where to turn.
  - Many of these families do not qualify at 125%.
- OACAC plans to implement a Child Care Project that would increase in-home childcare capacity in counties and help individuals to start their own business and earn a living wage. Because these are in-home childcare facilities, raising the income guidelines to 200% will likely result in a larger percentage of participants that are homeowners and/or need fewer repairs to the home. If families rent, they must get landlord approval before starting an in-home childcare business. According to MIS, 69% of those served at the 125% guideline are renters. If/when we see virus spread when families return to school, we anticipate congregate daycares will be closing and/or service interruptions. In-Home daycares with their small groups will likely have an easier time staying open and/or serving small, stable groups. We feel strongly that the success of this initiative and the resources it could bring to communities depends heavily on the 200% increase.
- The moratorium on evictions only was a reprieve for those with certain funding sources for their housing assistance; those that are already considered low-income. It did not apply to private landlords in most cases. So those that earn too much to be considered low-income to qualify for housing programs that benefited from the moratorium, have received no support or assistance. These likely would be our 126%-200% folks.
- A family made \$27 too much to qualify for any help. If they missed a day of work they would qualify, but otherwise they are stuck with no assistance to help them.
- Because of the situation with COVID-19 & schools, some two-income families may be forced to become oneincome families to deal with the educational needs of their children. Many of these families likely were over 200% when they had two-incomes, but do not qualify at 125% even with one income. They still will carry the same bills that they had as a two-income family.
- Counties report seeing people in tears that have cashed in their 401K accounts went through their savings and still looking at foreclosures on their mortgages. Mortgages are more likely to be carried by those above 125%.
- Counties anticipate that once they start helping folks, and if the eligibility stays at 125%, word will get out in the community about assistance available. When families come in that are over that guideline, staff anticipate dealing with families that are angry and frustrated. They anticipate hearing how these families don't understand why they don't qualify and about how they are in a place where they make too much for assistance but not enough to cover basic needs.
- Counties are still seeing individuals that never received the extra unemployment benefits, even though they applied.
- Weatherization and LIHEAP already serve a higher eligibility percentage.

- There are several funding sources out there right now to assist people (CDBG, EFSP, etc). County staff feel that because other assistance is available it is highly unlikely that individuals 125% or below won't be served if eligibility increases.
- The Act was passed to be COVID-19 relief specifically.
- Families that are between 126%-200% likely can't receive SNAP or other assistance/benefits. Yet, they also have experienced negative impacts to their personal financial obligations. An increase in percentage would allow us to offer assistance to those who haven't been able to obtain it through other avenues.
- The spirit of the Act was advocacy for 200%.
- Children are home much more. Families need more money for food and these families likely can't receive SNAP.
- Internet access is no longer a luxury for families. All utilities have increased as folks are home more often. Increasing the percentage would allow us to offer assistance to those who haven't been able to obtain internet/utility assistance through other avenues.
- Generally speaking the cost of living has gone up tremendously since March. Household items like cleaning supplies and bleach have seen increases, as has meat and other foods. What you could buy at 125% poverty in March is much different than what you can buy right now. People are struggling.
- Those that lost employment for a short period of time may have returned to work but they are still trying to get caught up on personal financial obligations. Counties are seeing utility bills into the thousands of dollars and families several months behind on rent and mortgages.

Jennifer Olson CSBG Director 215 S. Barnes Springfield, MO 65802 Ph: (417) 873-3381

#### **OACAC Greene County Supervisor**

560-A North Stewart Springfield, MO 65802 Ph: (417) 447-0554 Fax: (417) 832-0303

http://oac.ac/

From:	Joan Kurtzeborn <jkurtzeborn@hotmail.com></jkurtzeborn@hotmail.com>
Sent:	Wednesday, August 26, 2020 8:56 PM
То:	FSD CSBG Cares Public Comment
Subject:	Federal money for those in need

I am sending this short but extremely important note for the purpose of helping those in our community who are in need of financial support due to Covid. Will you please increase the amount allowable from 125% to 200% federal poverty level. Have mercy during this difficult time.

Sincerely

Joan kurtzeborn

Sent from my iPad

From:	Monica Virgin <monicavirgin221@gmail.com></monicavirgin221@gmail.com>
Sent:	Wednesday, August 26, 2020 1:45 AM
То:	FSD CSBG Cares Public Comment
Subject:	Have 7 kids struggling

I have 7 kids struggling to survive need more food stamps for school and more help with family that has more than5 kids need more help plus more money for utility rembursment from housing authority there no help more help with bills

From:	Monica Virgin <monicavirgin221@gmail.com></monicavirgin221@gmail.com>
Sent:	Wednesday, August 26, 2020 1:59 AM
То:	FSD CSBG Cares Public Comment
Subject:	I have 7 kids

Debit cards for family that have kids in school 50 for every child every 2 weeks or every month for family that has 5 or more kids I have 7

From:	Hosea B. <hbilyeu@christiancountymo.gov></hbilyeu@christiancountymo.gov>
Sent:	Wednesday, August 26, 2020 9:26 AM
То:	FSD CSBG Cares Public Comment
Subject:	Income Eligibility Guideline - Covid CARE Funds

To whom it may concern:

I am the Western Commissioner of Christian County, Missouri, and I serve on the board at our local OACAC. I support utilizing a 200% income eligibility guideline, at least until the current economic distress has eased.

Thank you.

Hosea Bilyeu

From: Sent: To: Subject: Attachments: Deneen Parmley <deneenmcc@yahoo.com> Wednesday, August 26, 2020 1:49 PM FSD CSBG Cares Public Comment Poverty Income Limits CARES comment letter (1).docx

Sent from Mail for Windows 10



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# East Missouri Action Agency Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape Girardeau, Iron, Madison, Perry, Ste. Genevieve, St. Francois and Washington.

As an organization (or individual Supporter of CAA) that/who serves and advocates for low-income Missourians, we are/I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the income eligibility threshold for services.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we/I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. CAA/I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Sincerely,

Deneen Parmley House of Praise Food Pantry 573-631-7064 deneenmcc@yahoo.com

From: Sent: To: Monica Virgin <monicavirgin221@gmail.com> Wednesday, August 26, 2020 1:55 AM FSD CSBG Cares Public Comment

Gift cards for family with 5 more kids to Walmart

From: Sent: To: Monica Virgin <monicavirgin221@gmail.com> Wednesday, August 26, 2020 1:52 AM FSD CSBG Cares Public Comment

Have 7 kids need more help for family like mines that have a lot of kids food help plus help from the housing authority with increase utility rembursment every 1st of month more than what we get

From: Sent: To: Subject: Charlie Roll <roll-8@embarqmail.com> Thursday, August 27, 2020 11:09 AM FSD CSBG Cares Public Comment 200% Income Eligibility Guideline

The Leadership at CMCA firmly supports a 200% income eligibility guideline and we ask for your support through public comment. At this time, the Missouri Department of Social Services is asking for public comments on the proposed amendment to its State CSBG Plan for CARES Act funding and I would deeply appreciate you adding your voice.

Sent from my iPhone Charlie Roll 1400 Hillcrest Rd California, Mo 65018 573-353-2587

From: Sent: To: Subject: Charlie Roll <roll-8@embarqmail.com> Thursday, August 27, 2020 11:11 AM FSD CSBG Cares Public Comment 200%

The Department of Social Services is reasonably interested in serving the poorest of the poor. However, these are the most unusual circumstances anyone could have imagined. Many on fixed income are no worse off than they were before (setting aside the issues that are affecting *every* parent of a school-aged child). They still have access to whatever benefits they have been receiving. Those who wouldn't qualify for most forms of public assistance who have lost income are the ones feeling the most adverse effects. I'd like to see us provide the broadest safety net possible to maintain the economic stability of our community.

Sent from my iPhone Charlie Roll 1400 Hillcrest Rd California, Mo 65018 573-353-2587

From: Sent: To: Subject: ROB BAKER <bka\_1@yahoo.com> Thursday, August 27, 2020 4:25 PM FSD CSBG Cares Public Comment CARES ACT FUNDING

# East Missouri Action Agency Comments

# **CSBG CARES Act Funding State Plan Amendment**

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape Girardeau, Iron, Madison, Perry, Ste. Genevieve, St. Francois and Washington.

As an individual who cares about the families in my community who were adversely affected by the pandemic, I want to take time to comment in support of raising the income guidelines to access the CARES Act funding.

### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% **that is allowed by the CARES Act for CSBG funds.** I kindly request the Department to re-consider this decision and to **raise the income eligibility threshold to 200%** of the Federal Poverty Level for a variety of reasons, including those outlined below.

• For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.

• Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.

• Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.

• To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of East Missouri Action Agency to deliver the services our region needs now more than ever. These funds are specifically allocated to serve those adversely affected by the pandemic. Raising the Federal Poverty Level to 200% allows those families to be served.

Sincerely,

Rob Baker

Farmington, MO

# **Rob Baker**

www.bakersacademy.net

From:	Jean Mueller <fjmueller334@gmail.com></fjmueller334@gmail.com>
Sent:	Thursday, August 27, 2020 8:49 PM
То:	FSD CSBG Cares Public Comment
Subject:	Cares Act Poverty Income Guidelines

To Whom It May Concern,

It has come to my attention that the State chose to set the poverty income guidelines at 125% for those seeking assistance from the CARES Act funding.

I am writing to encourage those who are making this decision to consider the impact it will have on those who are in need of assistance, resulting from COVID-19 pandemic circumstances. Please change the poverty income guidelines for this funding to 200%.

Many families that have never sought assistance are experiencing financial, mental health crisis and a myriad of other situations related to the pandemic. Because of this situation, working families with a higher income are finding themselves in need of assistance. If the income guidelines are not increased many families are going to fall further into debt and financial crisis. These funds were made available to assist these very situations so it only makes sense to allow access to more families and avert serious financial outcomes.

I appreciate your consideration of this request to increase the poverty income guidelines from 125% to 200% for the CARES Act funding. This is the right thing to do for Missouri citizens who have been impacted by the pandemic. Please make the change and help those most in need as the funds were intended to do.

Thank you,

Jean Mueller

From:
Sent:
To:
Subject:

Debi Deason <womanwhowatches@gmail.com> Thursday, August 27, 2020 7:25 PM FSD CSBG Cares Public Comment CARES Act public comment

I am writing in support of the 200% income eligibility guideline currently being considered. As someone who lives on a fixed income I can understand the difficulty of living on the current \$15,500 limit. The current limit leaves a gap between what is needed to pay for bills, food, and needed medical care. The proposed eligibility limit would be \$25,520 which is much closer to what it takes to cover expenses for people.

Debra Alexander Fredericktown, MO

From:	Cortney Mullins <mullinsc@mvcaa.net></mullinsc@mvcaa.net>
Sent:	Thursday, August 27, 2020 2:00 PM
То:	FSD CSBG Cares Public Comment
Subject:	CARES funding Public Comment

#### To whom it may concern:

I am writing to you during this public comment period to share my support of raising the poverty threshold for the CSBG CARES funding. We are experiencing unprecedented times and many families are in need. Many of those families are working families that have fallen on hard time due to layoffs, cut hours, and/or losing their jobs. It is vital that we help these families who may need a hand to rise above the challenges they are facing. Most families are one tragedy away from financial disaster and this COVID-19 pandemic has been that one tragedy for many families. By raising the CSBG eligibility threshold from 125% to 200% we are giving many more families the opportunity to rise above the challenges they are facing. And possibly keeping them from the tight grip of poverty.

We conducted a COVID-19 Community Survey during March and April. We were able to collect close to 600 surveys and below are just a few responses that we received. These are copied and pasted directly from the survey:

- I believe the after effects will cover a wide variety of socioeconomic classes and resources should reflect the "out of the usual" client base.
- Both of us work part-time; had another side-biz, but it tanked a month ago b/c of COVID-19. Concerned about
  paying utility bills now & later d/t the lost income. We've been called "cliff hangers" we usually don't qualify for
  help, but it sure would be nice if we did.
- My hope is that as things start to improve, some adjustments are made to the qualifications for assistance.
   People will need help to recover and strict rules for assistance will not help. When people return to work it will take weeks or months for things to go back to normal and removing all assistance just because someone has an income again, does more harm than good.
- Self-employed as I am .. we are left out in the cold.. can't claim unemployment.. we are just doing without!
- Seems that low to middle class falling between cracks.
- Like many in our position of being disabled and on a fixed income, trying to ensure that we have a small amount of extra food and a 1 month extra supply of medications, places a real monetary burden on us. When things begin to improve, people in a situation like ours are not able to recover as quickly financially as most. Having no way to generate any type of extra income, we must begin to cut where ever possible, even if that means cutting the food budget. My hope is that as things start to improve, some adjustments are made to the qualifications for assistance. People will need help to recover and strict rules for assistance will not help. When people return to work it will take weeks or months for things to go back to normal and removing all assistance just because someone has an income again, does more harm than good.

I hope that the state of Missouri will see the importance of raising the CARES funding eligibility threshold to 200%. The working families that usually fall between the gaps deserve this help. Helping these individuals and families that fall between the 125% and 200% threshold will not impact those we are currently serving. Please do what is right for the hard working individuals who are needing a help up back up to being self-reliant.

Cortney Jolliff-Mullins, CNP | NCRT/I Community Services Manager Missouri Valley Community Action Agency P: (660)886-7476 xt. 829 F: (660)831-5039 mullinsc@mvcaa.net

From:	asmith@csinwmo.org
Sent:	Thursday, August 27, 2020 2:35 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES Act Funding State Plan Amendment

#### To Whom it May Concern,

Community Services, Inc. is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Atchison, Gentry, Holt, Nodaway and Worth. As an organization that serves and advocates for low-income Missourians, II am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the specific area of the income eligibility threshold for services.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a
  level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are
  requesting much needed assistance and resources for which they are ineligible due to still having some form of
  income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of Community Services, Inc. to deliver the services our region needs now more than ever.

### Sincerely,

Amy Smith Gentry County/Worth County Outreach Director 301 E 2nd Street PO Box 34 Stanberry Mo 64489 (660) 783-2004 OR 24 West 4th Street PO Box 221 Grant City Mo, 64456 (660) 564-2182 ~ Be The Change You Wish To See In The World ~

From:	Carla Wetzel <crwetzel@csinwmo.org></crwetzel@csinwmo.org>
Sent:	Thursday, August 27, 2020 2:00 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES Act Funding State Plan Amendment

To Whom it May Concern,

Community Services, Inc. is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Atchison, Gentry, Holt, Nodaway and Worth. As an organization that serves and advocates for low-income Missourians, II am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the specific area of the income eligibility threshold for services.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of Community Services, Inc. to deliver the services our region needs now more than ever.

Sincerely,

Carla Wetzel Operations Director 1212B South Main, P.O. Box 328 Maryville, MO 64468 660-582-3113

From:	Kelley Lucero <kelleyl@cmca.us></kelleyl@cmca.us>
Sent:	Thursday, August 27, 2020 1:56 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG Cares Funding
Attachments:	CSBG LetterofSupport_CCCNMO.pdf

Please find attached letter from Catholic Charities of Central and Northern Missouri. Thank You,

Kelley Lucero, CCAP Community Organizer New Email Address KelleyL@cmca.us Central Missouri Community Action 800 N. Providence, Ste. 220 Columbia, MO 65201 573-443-8706, ext. 1916 or 573-777-5238

Check out our <u>website</u> Follow our <u>Facebook</u> page Complete our online <u>volunteer application</u> Make a <u>donation</u> - Thank You

#### The Community Action Promise:

Community Action changes people's 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.

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P.O. Box 104626 2201 W. Main St. Jefferson City, MO 65110

Tel: 573.635.7719 www.cccnmo.org

Missouri Department of Social Services CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

RE: CSBG CARES Act State Plan

To Whom It May Concern,

Thank you for the opportunity to provide public comment on the State of Missouri's plan for the CSBG funding available to the state through the CARES Act. The economic, emotional, physical and social impact that the Coronavirus pandemic has had on the citizens of Missouri has led to a devastating result for thousands of families. As the social services arm of the Diocese of Jefferson City, Catholic Charities of Central and Northern Missouri has been on the front lines of providing assistance to our neighbors in need who have been impacted by the pandemic.

Congress appropriated funding for CSBG to provide services for people earning up to 200% of the Federal Poverty Level. The Missouri Community Action Network has recommended that the 200% FPL be applied to the Missouri State Plan to be more responsive to people and communities feeling the effects of the COVID-19 pandemic. We recommend that the eligibility level for those who can obtain services from Community Action Agencies be increased from 125% of the Federal poverty Level to 200%. Increasing the eligibility level of those who may benefit from the services this funding will provide has the opportunity to increase the flexibility of agencies like Central Missouri Community Action to assist those hardest hit by this pandemic

As you know, millions of Americans are applying for unemployment benefits, which is unlike anything our country has seen since the Great Depression. In fact, data shows that nearly one in four Americans in the labor force have filed for assistance. While unemployment benefits are available in each state, current Unemployment Insurance systems across the country are overwhelmed, making the process cumbersome and difficult to navigate. What we know from families coming to us for help is that even those who qualify have waited weeks to receive their first payment. They need financial support now to stay afloat but fall outside traditional 125% income guidelines that dictate who can receive services with CSBG funding.

Local businesses began furloughing and laying off staff months ago. The demand for products and services continues to decrease and more individuals and households fall victim to the income volatility created by COVID-19. Most of them need assistance and resources, possibly for the very first time in their lives. Typically, families asking for assistance for the first time are often above the 125% FPL currently in place. By expanding eligibility to 200% FPL, more Missourians will receive the benefits they so desperately need at an unprecedented time in our nation's history.



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Further, there are hundreds of thousands of low-wage earners continue reporting to work as they are deemed essential. Like those who are recently unemployed due to the pandemic, essential workers also need support from Community Action Agencies. A recent study from the Missouri Budget Project highlights key demographics and needs of Missouri's essential workforce. According to the study, Missouri's frontline workers are disproportionately likely to be living in poverty or near poverty. In many cases, these workers are living paycheck to paycheck, leaving them at risk for serious financial hardship if exposed to COVID-19 – particularly if they are also uninsured. This is just one critical finding from the study, which can be accessed here: https://www.mobudget.org/mo-essential-workforce/.

By increasing the income guideline to 200% FPL, Community Action Agencies will be able to serve a greater number of community members, which in turn will spur a quicker recovery by helping these families weather the financial crisis, but also injecting nearly \$27 million in revenue into Missouri's local economies through benefits provided to citizens, job creation, and leveraged funds or services that support local businesses and other non-profits.

Congress has created parameters that offer great flexibility to serve the broadest population possible and we believe that limiting these parameters run counter to that intent. It is for these reasons we ask that you increase the income guideline to 200% of the FPL. Doing so will leverage the experience, resources, and infrastructure of Missouri's Community Action Agencies to deliver the services Missourians need now more than ever.

Respectfully,

Daniel Cepter

Dan Lester **Executive Director** Catholic Charities of Central and Northern Missouri

From: Sent: To: Subject: Attachments: Tammy Walker <twalker@escswa.org> Thursday, August 27, 2020 4:14 PM FSD CSBG Cares Public Comment CSBG CARES PUBLIC COMMENTS CSBG CARES Comments.pdf

Tammy M. Walker, CCAP, NCRI Director of Community Development Economic Security Corporation of S W Area 302 Joplin Joplin, MO 64801 417-627-2016

# "You are a light. You are the light. Never let anyone – any person or any force – dampen, dim or diminish your light." -- Congressman John Lewis

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August 27, 2020

MO State Community Services Block Grant Unit Attn: Public Comment for MO Coronavirus Aid, Relief and Economic Security (CARES) Act funding state plan amendment 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

To Whom It May Concern:

Community Action has a long-standing reputation for delivering services that help low-income families and individuals achieve economic stability. The Community Services Block Grant (CSBG) funding is flexible and can be used to respond to the unique needs of our community. Countless families are suffering and need of assistance with employment, job training, education, childcare, housing, transportation and healthcare. Here is one example of a customer who is over the 125% income guideline that applied for LIHEAP assistance this summer.

"Mary" is a single mother who has three children ages 17, 12, and 10 years old. She works full time and brings home approximately \$2,821.82 per month. She reports only having \$500 in assets. She rents her home, which also has not been weatherized. She receives no assistance with food stamps. She is just above the 125% income guideline and not eligible for any CSBG Services. She is an example of a family our agency would like to serve. She has earned income but clearly, it is not enough to make ends meet.

We are asking respectfully that the State of Missouri's Community Services Block Grant Unit consider this request to increase the Poverty guidelines for the Community Services Block Grant to 200%. We believe that this change will allow our agency to provide needed services to low-income Missourians like Mary. Increasing the income guideline is the right thing to do for our state.

Sincerely

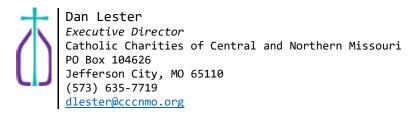
Tammy M. Walker, CCAP, NCRI Director of Community Development

Helping people Changing lives

From:	Dan Lester <dlester@cccnmo.org></dlester@cccnmo.org>
Sent:	Thursday, August 27, 2020 1:33 PM
То:	FSD CSBG Cares Public Comment
Cc:	Kelley Lucero
Subject:	CSBG Comments
Attachments:	CSBG LetterofSupport_CCCNMO.pdf

Hello – please see attached. Thank you,

Dan



#### cccnmo.diojeffcity.org | facebook.com/cccnmo | twitter.com/cccnmo

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Tel: 573.635.7719 www.cccnmo.org

Missouri Department of Social Services CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

RE: CSBG CARES Act State Plan

To Whom It May Concern,

Thank you for the opportunity to provide public comment on the State of Missouri's plan for the CSBG funding available to the state through the CARES Act. The economic, emotional, physical and social impact that the Coronavirus pandemic has had on the citizens of Missouri has led to a devastating result for thousands of families. As the social services arm of the Diocese of Jefferson City, Catholic Charities of Central and Northern Missouri has been on the front lines of providing assistance to our neighbors in need who have been impacted by the pandemic.

Congress appropriated funding for CSBG to provide services for people earning up to 200% of the Federal Poverty Level. The Missouri Community Action Network has recommended that the 200% FPL be applied to the Missouri State Plan to be more responsive to people and communities feeling the effects of the COVID-19 pandemic. We recommend that the eligibility level for those who can obtain services from Community Action Agencies be increased from 125% of the Federal poverty Level to 200%. Increasing the eligibility level of those who may benefit from the services this funding will provide has the opportunity to increase the flexibility of agencies like Central Missouri Community Action to assist those hardest hit by this pandemic

As you know, millions of Americans are applying for unemployment benefits, which is unlike anything our country has seen since the Great Depression. In fact, data shows that nearly one in four Americans in the labor force have filed for assistance. While unemployment benefits are available in each state, current Unemployment Insurance systems across the country are overwhelmed, making the process cumbersome and difficult to navigate. What we know from families coming to us for help is that even those who qualify have waited weeks to receive their first payment. They need financial support now to stay afloat but fall outside traditional 125% income guidelines that dictate who can receive services with CSBG funding.

Local businesses began furloughing and laying off staff months ago. The demand for products and services continues to decrease and more individuals and households fall victim to the income volatility created by COVID-19. Most of them need assistance and resources, possibly for the very first time in their lives. Typically, families asking for assistance for the first time are often above the 125% FPL currently in place. By expanding eligibility to 200% FPL, more Missourians will receive the benefits they so desperately need at an unprecedented time in our nation's history.



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Further, there are hundreds of thousands of low-wage earners continue reporting to work as they are deemed essential. Like those who are recently unemployed due to the pandemic, essential workers also need support from Community Action Agencies. A recent study from the Missouri Budget Project highlights key demographics and needs of Missouri's essential workforce. According to the study, Missouri's frontline workers are disproportionately likely to be living in poverty or near poverty. In many cases, these workers are living paycheck to paycheck, leaving them at risk for serious financial hardship if exposed to COVID-19 – particularly if they are also uninsured. This is just one critical finding from the study, which can be accessed here: https://www.mobudget.org/mo-essential-workforce/.

By increasing the income guideline to 200% FPL, Community Action Agencies will be able to serve a greater number of community members, which in turn will spur a quicker recovery by helping these families weather the financial crisis, but also injecting nearly \$27 million in revenue into Missouri's local economies through benefits provided to citizens, job creation, and leveraged funds or services that support local businesses and other non-profits.

Congress has created parameters that offer great flexibility to serve the broadest population possible and we believe that limiting these parameters run counter to that intent. It is for these reasons we ask that you increase the income guideline to 200% of the FPL. Doing so will leverage the experience, resources, and infrastructure of Missouri's Community Action Agencies to deliver the services Missourians need now more than ever.

Respectfully,

Daniel Cepter

Dan Lester **Executive Director** Catholic Charities of Central and Northern Missouri

From:Cenia Bosman <cbosman@caastlc.org>Sent:Thursday, August 27, 2020 10:29 AMTo:FSD CSBG Cares Public CommentSubject:CSBG Public Comment LetterAttachments:FINAL CSBG Hearing Comment Letter.docx



August 26, 2020

Community Services Block Grant (CSBG) 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109 <u>CSBGCaresPublicComment@dss.mo.gov</u>

RE: Public Comment Letter

To Whom It May Concern:

We, the Board of Directors of Community Action Agency of St. Louis County, Inc. (CAASTLC) offer this Letter of Comment in support of the Mission and work of this great community focused organization.

CAASTLC has been serving low-income individuals and families in St. Louis County for 52 years. Our staff team and volunteers are very knowledgeable and committed to helping people transition from impoverished conditions in St. Louis County. We are committed to the *Community Action Promise* to make America and our communities a better place to live.

The Community Services Block Grant (CSBG) is the only program created by Congress to solely focus on addressing poverty. Now more than ever, this funding is vital to the well-being of our most vulnerable citizens, as it allows Community Action Agencies the adaptability needed to serve their communities based on the specific needs of each designated service area. *Even though Congress provided CSBG an additional \$1 billion in the CARES Act, changes on the state level are needed to ensure this additional money can be used quickly and efficiently to help people recover from this pandemic.* 

Our staff and volunteers are very knowledgeable about the needs in the community and we are committed to helping people transition from impoverished conditions in St. Louis County. Over the many years, our services to assist these families in need has not wavered. Amid this global pandemic and the impact of COVID-19 in CAASTLC's service area (St. Louis County), we are experiencing the need for increased accessibility to the bundle of services that CAASTLC provides to families. CAASTLC serves more than 40,000 people per year through our CSBG programs and services. Due to the 10% poverty level in St. Louis County, we are one of the top CSBG eligible entities in the State of Missouri, and with the addition of CARES Act funding, we will have additional funds allocated to us to administer services to individuals and families in need. The current CSBG eligibility guidelines allow for serving households at 125% of poverty and below. COVID-19 has opened a new threshold of families who need our services. Currently, many of these families are not eligible to receive services due to the traditional income eligibility level. The income levels of some of the new families applying for assistance exceed 125%, in some instances because of increased unemployment benefit payments. Due to unprecedented circumstances, such as job loss, furloughs, kids at home with required virtual learning and

limited Childcare services due to day care closings, these new households are experiencing a real and overwhelming need for support from programs like our food distribution and comprehensive case management services. These and other safety net programs are needed now more than ever.

CAASTLC will receive CARES funding to support CSBG services. This funding was designed to help those who are low income and marginalized. CAASTLC's mission is to End Poverty and to help people change lives by preventing the conditions of poverty for present and future generations. COVID is causing an increased level of need for those who are faced with new life challenges and they need assistance to sustain quality of life and health. We are seeing customers who are above the 125% threshold and who without our assistance could possibility find themselves facing an unexpected crisis forcing them into a level of poverty which may be difficult to recover from. These families need us now and children need to have a quality of life and home educational learning experience that will help them thrive. It is our recommendation that the CARES funds we will receive, be used to help these families have the quality of life they so desperately deserve during this pandemic.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act is an economic stimulus bill intended to provide immediate assistance for families facing crisis. These families need help now. It is unfathomable to leave funds underutilized for families impacted by COVID-19 in a time when they need help the most. We hope that you will consider these concerns during your assessment of your final CSBG CARES Act Supplemental State Plan Amendment. A 200% eligibility guideline would allow CAASTLC to serve a wider group of households, many of whom have never sought or needed to request our services in the past but due to an expected crisis are now in desperate need. The current 2020 federal poverty guidelines are:

125% Household Income for 1 \$15,950; for 4 would be \$32,750 200 % Household Income for 1 \$25,520; for 4 would be \$52,400

Therefore, we, the Board of Directors of CAASTLC request the Missouri Department of Social Service, Family Support Division, to increase eligibility guideline for CSBG CARES Act Supplemental State Plan Amendment from 125% to 200% of poverty.

Thanking you in advance for your consideration.

Respectfully Submitted,

# CAASTLC BOARD MEMBERS:

Sheila Pearson, Board Chair Private Sector Representative

Michael Pendergast, Board Vice-Chair Public Sector Representative Joel Vickery, Board Treasurer Low Income Sector Representative

Gloria McQueen, Board Secretary Low-income Sector Representative

Rose Cason, Board Member Public Sector Representative

Tyrrell Rodgers, Board Member Private Sector Representative

Linda Eikerenkoetter, Board Member Low-income Sector Representative

Geralyn Clifton, Board Member Low-Income Sector Representative

Julie Harris, Board Member Low-Income Sector Representative

Yolanda Austin, Board Member Public Sector Representative

Louis Aboussie, Board Member Public Sector Representative

Antonio Maldonado, Board Member Public Sector Representative

Shira Truitt, Board Member Private Sector Representative

Terrie Hart, Board Member Private Sector Representative

Clayton Evans, Board Member Private Sector Representative

From:	Jessica Hoey <jhoey@communityaction.org></jhoey@communityaction.org>
Sent:	Thursday, August 27, 2020 4:10 PM
То:	FSD CSBG Cares Public Comment
Cc:	Dawna Fogarty
Subject:	CSBG State Plan Comments - Missouri CAN
Attachments:	MCAN Comments_State CSBG Plan Amendment_August 2020.pdf

Good afternoon, Missouri DSS Staff:

Attached please find comments in response to the CSBG State Plan Amendment. Should you have any questions upon review, please don't hesitate to contact me or Dawn Fogarty.

Kind regards,

Jessica



#### Jessica Hoey

Director of Public Affairs and Community Engagement Missouri Community Action Network (Missouri CAN) (573) 634-2969 Ext. 31 • <u>http://www.missourican.org</u> *Helping People, Changing Lives* 

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# Missouri Community Action Network Comments CSBG CARES Act Funding State Plan Amendment

Missouri CAN is the statewide membership association of Missouri's 19 Community Action Agencies, Allies, and Supporters dedicated to addressing the causes and conditions of poverty throughout Missouri. As an organization that advocates for low-income Missourians and strengthens our statewide Community Action Network, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, we have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. Missouri CAN kindly requests the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

The pandemic has shined a light on something Community Action has known for many years – that countless families who are not "officially" in poverty are still in precarious financial situations, often living paycheck to paycheck, one disaster away from extreme economic hardship. For so many now, the COVID-19 pandemic *is* that disaster. Most of these families are going to need assistance and resources, possibly for the very first time in their lives. Often, Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place.

By expanding eligibility to 200% FPL, Community Action Agencies can help more Missourians receive the benefits they so desperately need at an unprecedented time in our nation's history. In addition, Community Action Agencies will be able to serve a greater number of community members, which in turn will spur a quicker recovery by helping these families weather the financial crisis, but also injecting nearly \$27 million in revenue into Missouri's local economies through benefits provided to citizens, job creation, and leveraged funds or services that support local businesses and other non-profits.

To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of Missouri's Community Action Agencies to deliver the services Missourians need now more than ever.

### **Discretionary CSBG Funds**

Upon review of the state plan amendment, it appears that little information is provided about how CARES Act and regular CSBG funding will be utilized in relation to discretionary providers. For example, sections 7.6 and 8.1 include limited information about use of Training and Technical Assistance dollars. Section 14.2, though not required to be completed by the Office of Community Services, does not describe how the State of Missouri plans to use discretionary funds. And page 33, which includes a reference to state use of discretionary funds, indicates that information is found in sections 7.9 and 7.10 of the state plan; sections 7.9 and 7.10 are not fully outlined in the amendment. With limited information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area.

From:	Daniel Johnson <mebanedmj@outlook.com></mebanedmj@outlook.com>
Sent:	Thursday, August 27, 2020 3:12 PM
То:	FSD CSBG Cares Public Comment
Subject:	Federal Poverty Level – Income Eligibility Threshold for Services

Dear Friends:

As an individual who serves and advocates for low-income Missourians as a member of the Board of Directors of the Community Partnership of Southeast Missouri, I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in the income eligibility threshold for services. I am writing this as a community partner and supporter of the East Missouri Action Agency.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of the East Missouri Action Agency to deliver the services our region needs now more than ever.

Sincerely, Pastor Dan Johnson Retired MA, MBA, NCC (Retired), PCS (Retired) <u>mebane@aol.com</u> 2246 State Highway PP Jackson, MO 63755 573-243-8575 (voicemail and text) "He must increase, but I must decrease."

From:	Sharon Moore <smoore@oac.ac></smoore@oac.ac>
Sent:	Thursday, August 27, 2020 10:10 AM
То:	FSD CSBG Cares Public Comment
Subject:	Increase the Poverty Guideline from 125% to 200%

Due to the COVID-19 Pandemic and the repercussions of it, people need more help than ever now. Due to no fault of their own, thousands have lost their jobs and are unable to get work. Some have had to give up their jobs to stay at home to take of loved ones. I am asking that the Poverty Guideline be increased from 125% to 200% to help serve a larger group of people. Many of these people have never had to seek help, prior to the Pandemic. Please let up help as many people as we possibly can. We are a "Difference Maker" already, but we can make a much bigger difference with the increase.

Thank you for your time and your service to our communities.

Sincerely and God Bless,

Sharon Moore LIHEAP Office Assistant

From:	Janet Thompson <jthompson@boonecountymo.org></jthompson@boonecountymo.org>
Sent:	Thursday, August 27, 2020 9:29 AM
То:	FSD CSBG Cares Public Comment
Subject:	proposed amendment to State CSBG Plan for CARES Act funding

To Whom It May Concern:

I am writing to support the implementation of a 200% income eligibility guideline for Missouri's CSBG Plan for CARES Act funding. Especially given the impact of COVID-19, it is imperative that the guideline be set at 200% rather than at 125%. In addition to my job as a County Commissioner, I serve on the Board of the Central Missouri Community Action organization. If the 200% guideline were adopted, CMCA would be able to serve a much wider swath of our population, many of whom, due to sudden and unexpected circumstances brought on by COVID-19, had never before sought nor needed to utilize services. I urge you to adopt the 200% guideline to protect the health and welfare of the people of Missouri.

Janet Thompson Boone County District II Commissioner 801 East Walnut Room 333 Columbia, MO 65201 (O) 573-886-4309 (C) 573-864-5197 (F) 573-886-4311

From:	channing mcbeth <chanart05@gmail.com></chanart05@gmail.com>
Sent:	Thursday, August 27, 2020 5:43 PM
То:	FSD CSBG Cares Public Comment
Subject:	Public comment

My name is Channing Shelton

One thing I suggest you do with the cares act is provide more food stamps to those who have school age children but can not qualify for food stamps. They were given to families one time but children are still out of school. I am a parent of three it has been very difficult to provide breakfast, lunch and dinner and snacks to my children while they have been gone at school. Normally my children receive at least 2 of there meals from school. The food stamps provided for March, April and May helped however my kids normally attend summer school during the summer but was not able to attend physically due to covid. My kids school normally starts the middle of August but has been pushed back to September and will be done from home. It's already was hard trying to feed them while they were in school but is extremely hard since they are attending school from home not to mention the cost of food going up tremendously.

From:	McCrorey, Keri <kmccrorey@eastmoaa.org></kmccrorey@eastmoaa.org>
Sent:	Thursday, August 27, 2020 9:20 AM
То:	FSD CSBG Cares Public Comment
Subject:	Public Comment
Attachments:	image002.png; CSBG CARES Public Comment 2021.pdf

Please see the attachment for the CSBG Cares public comment.

Thank you.

Keri Keri McCrorey, CCAP Executive Director East Missouri Action Agency, Inc. 403 Parkway Dr, PO Box 308 Park Hills, MO 63601 573-431-5191 ext. 1125 573-431-7377 Fax

# If a free society cannot help the many who are poor, it cannot save the few who are rich. John F. Kennedy.

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# East Missouri Action Agency Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Bollinger, Cape, Iron, Madison, Perry, St. Francois, Ste. Genevieve and Washington. As an organization who serves and advocates for low-income Missourians, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon reviewing the state plan amendment, we have noted the Department has proposed that the income eligibility threshold remains at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. East Missouri Action Agency kindly request the Department to re-consider this decision and raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time in their lives. Most of these families are requesting much-needed assistance and resources for which they are ineligible due to still having some form of income in the household. Additionally, these families typically have an asset valued above the resource limit to qualify for many government programs. Thus leaving many Missourians without any form of assistance to help them overcome this pandemic economically.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure. In fact, in 2020, East Missouri Action Agency has had nearly 1,500 families seeking assistance who do not qualify under the 125% FPL. We have also witnessed an increase in the number of people seeking assistance across our service area.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of the East Missouri Action Agency to deliver the services our region needs now more than ever.

**Discretionary CSBG Funds** Upon review of the state plan amendment, it appears that little information is provided about how CARES Act and regular CSBG funding will be utilized in relation to discretionary providers for Training and Technical Assistance to Missouri's Community Action Agencies, which is so desperately needed during this crisis. For example, sections 7.6 and 8.1 include limited information about use of Training and Technical Assistance dollars. Section 14.2, though not required to be completed by the Office of Community Services, does not describe how the State of Missouri plans to use discretionary funds. And page 33, which includes a reference to state use of discretionary funds, indicates that

information is found in sections 7.9 and 7.10 of the state plan; sections 7.9 and 7.10 are not fully outlined in the amendment. With limited information available about how the state plans to use discretionaryfunded dollars, it is difficult to comment on the state's goals in this particular area. East Missouri Action Agency believes it is vitally important that training and technical assistance be provided to support our operations as we maneuver a new way of doing business during this pandemic. For example, face to face classes may need to be converted to a virtual platform. These discretionary dollars could be used to transition some of those services. Additionally, staff who have never delivered services virtually will need training, as well, for those services to be delivered effectively and efficiently.

As a Community Action Agency, it is critical for us to continue to support and find solutions for the emerging needs of community members in the EMAA service area. The CARES CSBG Act funding allows us to keep providing services in a way that ensures families have what they need to thrive in all areas of life. If the income eligibility guideline in not increased to 200%, people, who lives have been critically affected by COVID-19, will be unnecessarily placed in challenging positions.

We are in an unprecedented time, and flexibility using these funds is of importance.

Sincerely,

Nerory

Kerí McCrorey, Executive Director East Missouri Action Agency, Inc.

From:	Jacqueline Rogers <jaci.bush@gmail.com></jaci.bush@gmail.com>
Sent:	Thursday, August 27, 2020 10:49 AM
То:	FSD CSBG Cares Public Comment
Subject:	Stakeholder Comments Cares Funding
Attachments:	J Rogers Stakeholder Comments_State CSBG Plan Amendment_August 2020 (1).docx

To whom it may concern, Please find the attached letter outlining my comments regarding the FPL guidelines.

Thank you! Jaci Rogers

# Jaci Rogers Comments CSBG CARES Act Funding State Plan Amendment

East Missouri Action Agency is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Iron, Washington, Cape Girardeau, Bollinger, Madison, Perry, Ste. Genevieve, and St. Francois. As an individual Supporter of CAA that serves and advocates for low-income Missourians, I am submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.
- To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of East Missouri Action Agency to deliver the services our region needs now more than ever.

Sincerely,

Jaci Rogers 1132 HWY N Ironton, MO 63650 Jaci.bush@gmail.com

From:	Steve A. Smith <steves@jobpoint.org></steves@jobpoint.org>
Sent:	Thursday, August 27, 2020 2:40 PM
То:	FSD CSBG Cares Public Comment
Cc:	Darin Preis
Subject:	Support for 200% income eligibility guideline

Please accept this note as my expression of support to implement the 200% income guideline for State of Missouri Department of Social Services State CSBG Plan for CARES Act funding.

Our US Congress has authorized up to 200% FPL.

The 200% level increases flexibility to serve those most damaged by the pandemic.

This level would allow for better coordination with local providers that already use the 200% guideline such as City of Columbia Social Services, Heart of Missouri United Way and Voluntary Action Center.

Thank you for your consideration of this action to serve more deserving Missouri families in these extreme times of economic and health related distress.

Steven A. Smith President & Chief Executive Officer Job Point 400 Wilkes Columbia, MO 65201 573-777-1505 Work 573-819-5269 Cell steves@jobpoint.org

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From: Sent: To: Subject: Attachments: Mary Mullins <marym132000@gmail.com> Friday, August 28, 2020 11:49 AM FSD CSBG Cares Public Comment CARES ACT The Coronavirus Aid-signed.pdf

#### August 27, 2020

I am the CSBG Director of Missouri Ozarks Community Action (MOCA). MOCA operates the CSBG contract for 8 counties in Missouri. Our mission is to empower our community, families, and agency, change lives and inspire hope.

Our CSBG program has been determined to be an eligible entity to receive funding under the CARES Act. It is concerning that the state of Missouri decided to leave the poverty level at 125% when it was an option to go to 200% of poverty level.

A 200% eligibility guideline would allow MOCA to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to MOCA's services prior to COVID19. Proposed uses include direct client emergency services and community project initiatives direct services include, but not limited to, rental and mortgage assistance to avoid eviction, transportation costs, and case management to stabilize families that has lost hours or employment due to COVID, employment supports, educational support, emergency housing and food security assistance. I ask the state of Missouri to consider 200% eligibility guideline to support families in the state of Missouri.

We know that the people that were laid off barely above the 125% of poverty that fell behind because of loss hours to COVID will have a difficult time catching up. For example a Lady called this week and is able to pay her rent now because she received some of her hours back but she is almost 4000 dollars in arears on rent because she could not pay because of lost hours. Luckily she has a landlord that worked with her until she regained hours but the landlord is requesting the arears now that she is back to work. This family can make her monthly rent but will never catch up the arears.

Community initiatives would be but not limited to help other basic need nonprofits such as food pantries meet the influx of needs for the community. They would also include helping communities meet the need for cleanliness to help stop the spread of COVID.

I would also ask the state of Missouri to be flexible with work done in the community. During this crisis we need to be able to report work in the community that is not a full blown community project for example during a COVID needs assessment we contacted our local food pantries a majority of food pantries said they do not have the capacity to store cold food they need help with refrigeration. We need to be able to support the needs of these nonprofits so they can meet the needs of their communities during this crisis.

Mary Mullins

From:	Shirley Allison <treasurer@polkcountymo.org></treasurer@polkcountymo.org>
Sent:	Friday, August 28, 2020 2:21 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG Cares Act 200% poverty guideline support

I am a board member of Polk County O.A.C.A.C. I am asking that you raise the poverty guideline to 200%. Due to the increase in the number of people needing help during the COVID Pandemic. It is my understanding that the State of Missouri has left the guideline at 125%. A 200% eligibility guideline would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. This could help with food, rent, mortgage to avoid foreclosure, transportation costs, school supplies and other necessities.

Thank you, Shirley Allison Polk County Treasurer 102 E. Broadway, Rm #1 Bolivar, MO 65613 (417) 326-4913 Fax: (417) 326-3615 treasurer@polkcountymo.org

From:	Nick Foster <dir@vacmo.org></dir@vacmo.org>
Sent:	Friday, August 28, 2020 3:58 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES Comment

Hello,

This is in reference to the DSS consideration of its State Plan for the disbursement and use of CSBG CARES Act Funding.

My understanding is that DSS plans to make services funded from this source available to those with incomes up to 125% of Federal Poverty Guidelines. I want to encourage you to increase this limit to 200% of those guidelines, for the following reasons:

- Congress has allowed use up to 200%.
- This limitation is followed by VAC, my agency, for the large majority of services provided by us. As we plan to collaborate with CMCA in the use of these funds, allowance up to 200% will lead to more efficient use and administration.
- Many if not most of those who would be served at or below 125% of guidelines already have stable supports in place.
- Perhaps most significantly, many impacted by the COVID-19 crisis have incomes above 125% of the guidelines. For these people, this is an unusual, unprecedented crisis; we have witnessed this reality in recent weeks and months. We need as much flexibility as possible in the use of relief funds.

I hope you will take my comments into consideration and make arrangements to allow provision of the CSBG CARES Act funding available to those with incomes at or below 200% of Federal Poverty Guidelines.

Thank you,



Nick Foster Executive Director 573.874.2273 | Fax: 874.9172 403 A Vandiver Drive, Columbia, MO 65202 dir@vacmo.org | www.vacmo.org f Confidentiality Notice: This email mess

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*VAC Continues to Provide Services!* See our response to Covid-19 <u>here</u>.

From:	Joel Evans <jevans@daeoc.com></jevans@daeoc.com>
Sent:	Friday, August 28, 2020 9:33 AM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG CARES Public Comment
Attachments:	Agency or Stakeholder Comments_State CSBG Plan Amendment_August 2020- DAEOC.pdf

please accept the attached comments on the CSBG CARES act state plan from Delta Area Economic Opportunity Corporation.

--

# Joel P. Evans, CCAP

President & CEO 99 Skyview Road Portageville, Missouri 63873 P: 573-379-3851 ext. 109 F 573-379-5935



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## **Comments on CSBG CARES Act Funding State Plan Amendment**

Delta Area Economic Opportunity Corporation (DAEOC) is the designated Community Action Agency dedicated to addressing the causes and conditions of poverty in the following Missouri counties: Dunklin, Mississippi, New Madrid, Pemiscot, Scott, and Stoddard. As an organization who serves and advocates for low-income Missourians, we are submitting comments in regard to the state plan amendment for the CSBG CARES Act funding in two specific areas: 1) the income eligibility threshold for services and 2) information related to the state's use of discretionary CSBG funds.

#### Federal Poverty Level – Income Eligibility Threshold for Services

Upon reviewing the state plan amendment, we have noted the Department has proposed that the income eligibility threshold remains at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. Delta Area Economic Opportunity Corporation urges the Department to re-consider this decision and raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

- For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time in their lives. Most of these families are requesting much-needed assistance and resources for which they are ineligible due to still having some form of income in the household. Additionally, these families typically have an asset valued above the resource limit to qualify for many government programs. Thus leaving many Missourians without any form of assistance to help them overcome this pandemic economically.
- Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure. DAEOC has seen a dramatic increase in individuals seeking assistance for the first time and many of these applicants have income above the 125% threshold who would be eligible if the limit was at 200% of FPL.
- Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been *severely impacted* by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty. Assistance to those in the 125-200% of FPL category during this time of crisis has the potential to stop the downward spiral that could result in long-term need for public assistance.

• To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of Delta Area Economic Opportunity Corporation to deliver the services the Southeast Missouri Bootheel needs now more than ever.

**Discretionary CSBG Funds** Upon review of the state plan amendment, it appears that little information is provided about how CARES Act and regular CSBG funding will be utilized in relation to discretionary providers for Training and Technical Assistance to Missouri's Community Action Agencies, which is so desperately needed during this crisis. For example, sections 7.6 and 8.1 include limited information about use of Training and Technical Assistance dollars. Section 14.2, though not required to be completed by the Office of Community Services, does not describe how the State of Missouri plans to use discretionary funds. And page 33, which includes a reference to state use of discretionary funds, indicates that information is found in sections 7.9 and 7.10 of the state plan; sections 7.9 and 7.10 are not fully outlined in the amendment. With limited information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area. East Missouri Action Agency believes it is vitally important that training and technical assistance be provided to support our operations as we maneuver a new way of doing business during this pandemic. For example, face to face classes may need to be converted to a virtual platform. These discretionary dollars could be used to transition some of those services. Additionally, staff who have never delivered services virtually will need training, as well, for those services to be delivered effectively and efficiently.

As a Community Action Agency, it is critical for us to continue to support and find solutions for the emerging needs of community members in the DAEOC service area. The CARES CSBG Act funding allows us to keep providing services in a way that ensures families have what they need to thrive in all areas of life. If the income eligibility guideline is not increased to 200%, people, those whose lives have been critically affected by COVID-19 will be unnecessarily placed in challenging positions. It is the position of DAEOC that failure to take advantage of the latitude afforded by the 200% federal guideline will lengthen the recovery period unnecessarily for many Missourians.

We are in an unprecedented time, and flexibility using these funds is of importance.

Respectfully submitted,

Al Enne

Joel P. Evans, CCAP President & CEO

From:	Margarite Stever <mstever@escswa.org></mstever@escswa.org>
Sent:	Friday, August 28, 2020 2:26 PM
То:	FSD CSBG Cares Public Comment
Subject:	CSBG INCOME GUIDELINES REQUEST
Attachments:	Change CSBG Guidelines to 200%.docm

To Whom It May Concern:

Please find the attached letter requesting the Missouri CSBG Income Guidelines be increased to 200% of the Federal Poverty Level.

We appreciate your attention.

Cordially,

# Margarite R. Stever

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# Economic Security Corporation of Southwest Area

Weatherization Department

1924 West 4th Street, Joplin, Missouri 64801 (417)781-4437 Fax (417)781-1961

August 28, 2020

MO State Community Services Block Grant Unit Attn: Public Comment for MO Coronavirus Aid, Relief and Economic Security (CARES) Act Funding State Plan Amendment 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

To Whom It May Concern:

The goal of Community Action is to help low-income families and individuals achieve economic stability. The Community Services Block Grant (CSBG) is a valuable resource in obtaining that goal, but it could help even more people.

Right now, a family of three people must gross less than \$27,150.00 per year in order to qualify for services funded by CSBG. With housing, food, clothing, education, transportation, and childcare costs skyrocketing, many families are living paycheck to paycheck and barely getting by.

It's incredibly difficult to make ends meet in this uncertain economy. The pandemic has cost thousands of Missourians their jobs or forced a decrease in hours at their jobs. Our citizens are suffering due to circumstances that are no fault of their own.

According to the Low Income Housing Coalition, a person must work full-time and make \$16.07 per hour in order to afford a two bedroom home. A single parent with two kids needs to make \$33,425.60 a year just to afford a two bedroom home. That puts the family over-income for any assistance from CSBG. However, if the income guidelines were increased to 200% of the Federal Poverty Level, that single parent household would qualify for some assistance.

We respectfully request that the State of Missouri's Community Services Block Grant Unit consider this request to increase the income guidelines for the Community Services Block Grant to 200% of the Federal Poverty Level. This change will allow our agency to provide much needed services to low-income Missourians and provide some relief to those struggling during these desperate times.

Sincerely,

Ryan Peterson

Ryan Peterson, Director of Weatherization

From:	Katrina Bursley <kbursley9709@gmail.com></kbursley9709@gmail.com>
Sent:	Friday, August 28, 2020 10:51 AM
То:	FSD CSBG Cares Public Comment
Subject:	[Released] Cares act

It should be used to help with reunification. Families are ve seperated for the power hungry men and women of DSS. #SaveOurChildren #StopForcedAdoption

Katrina Bursley 314-526-5138 kbursley9709@gmail.com

From:	Debi <dreece1713@yahoo.com></dreece1713@yahoo.com>
Sent:	Friday, August 28, 2020 4:20 PM
То:	FSD CSBG Cares Public Comment
Subject:	Please increase CARES poverty eligibility guideline to %200 percent.

I could give you many examples of people I have met that were in decent financial shape pre-Covid. People that worked. Two-parent households with both working. Hard-working folks that had two or more jobs trying to make it, Single working parents with no child care options. As we know, very few people have a savings account or an emergency fund, working from paycheck to paycheck, and of those that do have a savings, they've depleted them.

I work for a non-profit agency. I've seen more people that have never asked for help before. They don't want to be here. They just want to work and take care of their families. Hours have been cut. Jobs ended. Once you get behind, it's like being in a spinning hamster wheel trying to catch up.

There are so many that have been affected by COVID-19 and isn't CARES money intended to help and to show CARE for those impacted? Please allow us to do just that by increasing the guideline from 125% to 200%.

Debi Reece

From:	Darin Preis <darinp@cmca.us></darinp@cmca.us>
Sent:	Friday, August 28, 2020 12:21 PM
То:	FSD CSBG Cares Public Comment
Subject:	Public Comment - CSBG CARES Act

#### To Whom it May Concern,

On behalf of Central Missouri Community Action I am expressing our interest in increasing the income eligibility to 200% for people served by Community Services Block Grant funding. The following are my reasons for taking this position:

- Congress specified eligibility up to 200% FPL. Why wouldn't we use the most inclusive standard?
- 200% increases flexibility to serve those most damaged by the pandemic.
- Families who have seen declines in their income are less stable than those who have had consistent public benefits under the traditional 125% FPL.
- To better coordinate services with local organizations that use 200% FPL. In Columbia that includes the City of Columbia Social Services Department, Heart of Missouri United Way, and Voluntary Action Center.
- The Federal Poverty Guideline is not a good indicator of whether someone can meet their basic needs. 200% of FPL is a much closer approximation.

I appreciate the Department of Social Services' interest in serving the poorest of the poor. However, these are the most unusual circumstances anyone could have imagined. Many on fixed income are no worse off than they were before (setting aside the issues that are affecting *every* parent of a school-aged child). They still have access to whatever benefits they have been receiving. Those who wouldn't qualify for most forms of public assistance who have lost income are the ones feeling the most adverse effects. I'd like to see us provide the broadest safety net possible to maintain the economic stability of our state.

Thank you for the opportunity to offer public comment.

#### Darin Preis • Executive Director

Central Missouri Community Action 807B North Providence | Columbia, MO 65203 P: 573.443.8706, 1025 | F: 573.875.2689



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From:	Lena Hammond <lhammond@oac.ac></lhammond@oac.ac>
Sent:	Friday, August 28, 2020 12:47 PM
То:	FSD CSBG Cares Public Comment
Subject:	Public comment period for the proposed CSBG Missouri Cares Act State Funding Plan Amendment

I am in support of the 200% poverty guideline. Why? Because we see families that come in to the office that make 20 or 30 dollars over the 125% poverty guideline. It's heartbreaking to have to tell a family who is need of help and that has never needed it before that they make 27 dollars too much to get help. Other States have approved the 200% poverty guideline. Now it's time for Missouri to do the same. We could help so many more people are not only at or below the 125% but that are between the 126%-200%.

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From: Sent: To: Subject:	Carl Rosenkranz <crosenkranz@oac.ac> Friday, August 28, 2020 11:46 AM FSD CSBG Cares Public Comment Public Comment Period on the Proposed CSBG Missouri CARES Act Funding State Plan Amendment</crosenkranz@oac.ac>
Importance:	High

From:

Carl Rosenkranz. Executive Director, Ozarks Area Community Action Corporation

In response to the email sent on Monday, August 17, 2020 announcing the public comment period on the proposed CSBG Missouri CARES Act funding state plan amendment, I would like to add my comments and questions. The OACAC Board of Directors has already submitted a Board Resolution in support of the 200% HHS poverty line as their comment.

I am in support of changing the HHS poverty line percentage for the Missouri CSBG CARES Act money for Community Action Agencies from the current 125% of the HHS poverty line to 200% of the HHS poverty line. Please refer to Section 12: Individual and Community Income Eligibility Requirements, 12.1 Required Income Eligibility on page 24 of the Missouri CSBG CARES Act Supplemental State Plan. 200% of the HHS poverty line is an option on the same page 24.

The State of Missouri decided to submit the state plan amendment for public comment without addressing why their decision was to leave the HHS poverty line at 125% instead of changing the HHS poverty line to 200% which was one of the state's options. I believe the state will say that it was not obligated to explain its action do so and just had to submit the plan for public comment. It would have been very helpful for people who are commenting on the plan to have had the opportunity to refer to the State's reasons for not changing the HHS poverty line from 125% to 200%. We are left to speculate on the state's action and their glaring lack of transparency.

During the CSBG Monthly Conference Call on Tuesday, August 11, 2020 the FPL% (125 vs 200) was discussed. "Caitlin Whaley advised that the Governor's Office and the Department are aware of both FPL options and have not made a decision at this time."

On Monday, August 17, 2020 at 4:06 PM, Rebecca Woelfel from DSS emailed the public comment notice, the funding information for CAA's and a link to the CARES Act funding state plan amendment which contained the decision to leave the HHS poverty line at 125% on page 24 of the state plan.

Who made the decision to leave the HHS poverty line at 125%? The Missouri Governor? The Missouri Department of Social Services? When was that decision made? Why was the decision made? We are being asked by agency partners why this happened (125% not 200%). We can't tell them anything because we don't know. That is wrong.

Why do I support 200%? Using a poverty guideline that is 200% of the HHS poverty line would allow OACAC to serve a wider group of people, many of whom, due to sudden and unexpected changed circumstances, have never sought or needed to utilize services prior to the pandemic. With an increase in the HHS poverty line we are talking about providing direct services and community project initiatives including, but not limited to, rental and mortgage assistance to avoid eviction and foreclosures, transportation costs related to employment, mental health support due to the effects of the pandemic, dental costs, vision costs, employment supplies such as technology and PPE, educational support and food security assistance.

The OACAC Neighborhood/Community Centers employees in our ten county service area are on the front line trying to help people improve their quality of life and survive the pandemic. The staff have seen and continue to see a wide

variety of situations over the past five months that could be alleviated or at least reduced with the use of the 200% HHS poverty line. We had asked the OACAC Centers for their comments that have already been submitted. Examples of their comments are that OACAC counties are seeing a large increase in families that have never asked for help and a wide range of jobs impacted by COVID-19. These families are new to job loss and don't know where to turn. OACAC needs to have the resources to assist these families. A family made \$27.00 too much to qualify for any help. If they missed a day of work they would qualify, but otherwise they are stuck with no way to get assistance. Weatherization and LIHEAP already serve a higher poverty percentage. There are several funding sources available right now to assist people such as COVID-19 CDBG grant money which is available through the counties for non-profits but ends in December 2020 (OACAC has only received two grants with CDBG income guidelines). OACAC counties also have the FEMA Emergency Food and Shelter Program which is operating Phase 37 and a CARES PHASE with limited one-time funds for mostly emergency rent and mortgage assistance with the use of the current CSBG 125% poverty line just for this year. County Centers' staff know that we will serve families and individuals with the CARES Act money regardless of whether or not their income level is below or above 125% of the HHS poverty line.

This is the CARES Act we are talking about. The Missouri CSBG CARES Act Supplemental State Plan HHS poverty line is listed at 125% with no explanation for that decision. It appears that Missouri State Government does not care about assisting people in need who would qualify for services with an HHS poverty line between 126% and 200%. Please remember that the intent of the CARES Act law is to provide emergency assistance for individuals, families and businesses affected by the 2020 coronavirus pandemic (COVID-19).

Please listen to the people who comment in support of the use of CSBG CARES Act money at 200% of the HHS poverty line.

Thanks,

Carl Rosenkranz Executive Director OACAC <u>crosenkranz@oac.ac</u> 417-864-3492

From:	rcarroll@csinwmo.org
Sent:	Friday, August 28, 2020 1:06 PM
То:	FSD CSBG Cares Public Comment
Subject:	public comment

Federal Poverty Level – Income Eligibility Threshold for Services

Upon review of the state plan amendment, I have noted the Department has proposed that the income eligibility threshold remain at 125% of the Federal Poverty Level, rather than the 200% that is allowed by the CARES Act for CSBG funds. I kindly request the Department to re-consider this decision and to raise the income eligibility threshold to 200% of the Federal Poverty Level for a variety of reasons, including those outlined below.

For so many in our community, the COVID-19 pandemic has led to the loss of at least one income, and thus a level of poverty that families may be experiencing for the first time ever in their lives. Most of these families are requesting much needed assistance and resources for which they are ineligible due to still having some form of income in the household.

Community Action Agencies find that families asking for assistance for the first time are above the 125% FPL currently in place but are under the 200% threshold, yet they are unable to be assisted with resources that can help them avoid hunger and food insecurity, utility disconnection, eviction, or even foreclosure.

Households in this situation are not considered the "poorest of the poor", or those which are traditionally served by CSBG dollars; however, they are struggling the most with meeting basic needs and financial obligations, such as housing and utility services. Our community is seeing that the poorest of the poor, many of whom receive a fixed income, have thankfully continued to receive their income regularly and have maintained financial stability, as they did not experience a primary income or job loss, unlike many of our neighbors. CARES Act CSBG funds are meant to reach those who've been severely impacted by the effects of COVID-19, not necessarily those who simply meet an extremely low threshold of poverty.

To limit services to only those who fall at or below 125% FPL is counterproductive to the very purpose of the CARES Act. Instead, raising the FPL to 200% will leverage the experience, resources, and infrastructure of [CAA] to deliver the services our region needs now more than ever.

Discretionary CSBG Funds (Agencies and Individuals can omit this section if desired OR expand on why TTA is so important during this time)

Upon review of the state plan amendment, it appears that little information is provided about how CARES Act and regular CSBG funding will be utilized in relation to discretionary providers for Training and Technical Assistance to Missouri's Community Action Agencies, which is so desperately needed during this crisis. For example, sections 7.6 and 8.1 include limited information about use of Training and Technical Assistance dollars. Section 14.2, though not required to be completed by the Office of Community Services, does not describe how the State of Missouri plans to use discretionary funds. And page 33, which includes a reference to state use of discretionary funds, indicates that information is found in sections 7.9 and 7.10 of the state plan; sections 7.9 and 7.10 are not fully outlined in the amendment. With limited information available about how the state plans to use discretionary-funded dollars, it is difficult to comment on the state's goals in this particular area. Sincerely,

Rita Carroll

Outreach Director

Holt County Community Services

From:	Emily Denniston <emily@springfieldchamber.com></emily@springfieldchamber.com>
Sent:	Friday, August 28, 2020 4:07 PM
То:	FSD CSBG Cares Public Comment
Cc:	Lauren Mustoe
Subject:	Springfield Chamber Public Comment

On behalf of the Springfield Area Chamber of Commerce we want to express our support of a 200% income eligibility for the distribution of Community Services Block Grant funds through the CARES Act. The coronavirus pandemic has impacted businesses, individuals and families in numerous ways, and support is critical. Increasing the eligibility for more individuals to receive funds through organizations like the Ozarks Area Communication Action Network (OACAC), will have a positive impact for the individuals who receive these funds, and on our state as a whole.

A 200% eligibility guideline would allow OACAC to serve a wider group of people, many of whom have never sought or needed to utilize services prior to the pandemic. Areas of need are critical including rental and mortgage assistance, transportation costs, mental health support, health care costs, educational support, and food security assistance. As a business organization, we know that the health of our community's workforce is critically important.

Thank you for your consideration and support of the 200% eligibility guideline for these funds.

Emily Denniston Vice President, Public Affairs Springfield Area Chamber of Commerce 202 S. John Q. Hammons Parkway Springfield, MO 65801 Direct Line: 417.450.6766 Cell: 417.849.0850

From: Sent: To: Barbara Sherry <br/>
barsherry@hotmail.com><br/>
Friday, August 28, 2020 9:40 AM<br/>
FSD CSBG Cares Public Comment

I am a Community Representative on a Head Start Policy Council representing Ste. Genevieve County. I am also a retired (29 years service) Division of Social Services social worker. I stand in support of a 200% income eligibility guideline!! There are so many ways this changed guideline could provide help for more families. Barbara Sherry 15534 State Rt B Ste Genevieve, MO

Sent via the Samsung Galaxy S9+, an AT&T 5G Evolution capable smartphone

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Missouri Department of Social Services CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

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Missouri Department of Social Services CSBG 3418 Knipp Drive, Suite A2 Jefferson City, MO 65109

#### RE: CSBG CARES Act State Plan

To Whom It May Concern,

Thank you for the opportunity to provide public comment on the State of Missouri's plan for the CSBG funding available to the state through the CARES Act. The economic, emotional, physical and social impact that the Coronavirus pandemic has had on the citizens of Missouri has led to a devastating result for thousands of families.

Congress appropriated funding for CSBG to provide services for people earning up to 200% of the Federal Poverty Level. The Missouri Community Action Network has recommended that the 200% FPL be applied to the Missouri State Plan to be more responsive to people and communities feeling the effects of the COVID-19 pandemic. Our organization closely partners with Central Missouri community Action Agency and recommend that the eligibility level for those who can obtain services from Community Action Agencies be increased from 125% of the Federal poverty Level to 200%. Increasing the eligibility level of those who may benefit from the services this funding will provide has the opportunity to increase the flexibility of agencies like Central Missouri Community Action to assist those hardest hit by this pandemic

As you know, millions of Americans are applying for unemployment benefits, which is unlike anything our country has seen since the Great Depression. In fact, data shows that nearly one in four Americans in the labor force have filed for assistance. While unemployment benefits are available in each state, current Unemployment Insurance systems across the country are overwhelmed, making the process cumbersome and difficult to navigate. What we know from families coming to us for help is that even those who qualify have waited weeks to receive their first payment. They need financial support now to stay afloat but fall outside traditional 125% income guidelines that dictate who can receive services with CSBG funding.

Local businesses began furloughing and laying off staff months ago. The demand for products and services continues to decrease and more individuals and households fall victim to the income volatility created by COVID-19. Most of them need assistance and resources, possibly for the very first time in their lives. Typically, families asking for assistance for the first time are often above the 125% FPL currently in place. By expanding eligibility to 200% FPL, more Missourians will receive the benefits they so desperately need at an unprecedented time in our nation's history.

Further, there are hundreds of thousands of low-wage earners continue reporting to work as they are deemed essential. Like those who are recently unemployed due to the pandemic, essential

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Budget Project highlights key demographics and needs of Missouri's essential workforce. According to the study, Missouri's frontline workers are disproportionately likely to be living in poverty or near poverty. In many cases, these workers are living paycheck to paycheck, leaving them at risk for serious financial hardship if exposed to COVID-19 – particularly if they are also uninsured. This is just one critical finding from the study, which can be accessed here: https://www.mobudget.org/mo-essential-workforce/.

By increasing the income guideline to 200% FPL, Community Action Agencies will be able to serve a greater number of community members, which in turn will spur a quicker recovery by helping these families weather the financial crisis, but also injecting nearly **\$27 million** in revenue into Missouri's local economies through benefits provided to citizens, job creation, and leveraged funds or services that support local businesses and other non-profits.

Congress has created parameters that offer great flexibility to serve the broadest population possible and we believe that limiting these parameters run counter to that intent. It is for these reasons we ask that you increase the income guideline to 200% of the FPL. Doing so will leverage the experience, resources, and infrastructure of Missouri's Community Action Agencies to deliver the services Missourians need now more than ever.

Respectfully.

fane Williams

Jane Williams, MSW Co-founder and Program Director

