



CENTER FOR COMMUNITY SERVICES DIRECTIVE

Title: Income Eligibility Determination
Directive #: C2018-04
Effective: October 1, 2018

To: Community Services Block Grant Subgrantees

From: Lynette Praster, Director – Center for Community Services

A handwritten signature in black ink, appearing to read 'L. Praster', is written over the 'From:' line.

1.0 Purpose

The purpose of this directive is to clarify policy concerning the determination of an individual or household's income eligibility for programs and services funded partially or wholly with Community Services Block Grant (CSBG) funds.

2.0 Revision History

This CSBG Directive is effective October 1, 2018 and replaces C2016-04.

3.0 Policy

This directive applies to all applicants or participants of CSBG-funded services unless specifically exempted in writing by the Pennsylvania Department of Community and Economic Development (DCED). CSBG or any other program income eligibility determination should be integrated as part of the agency's intake process. This will help ensure clients' eligibility and clearly define client eligibility to participate in agency programs and services.

- A. If CSBG funds are used primarily to support agency administration, then the agency should follow income eligibility determination for the particular services a client receives.
- B. If CSBG funds are directly used to wholly support a program, then CSBG income eligibility determination should be used for the clients participating in the program or receiving those services.
- C. If CSBG funds are used to partially support direct program expenses, an equal percentage of the clients being served must meet CSBG income eligibility. For example, if a program is supported 20 percent by CSBG funds, 20 percent of the clients participating in the program or receiving that service **must** meet CSBG eligibility requirements.

A participant's income in relation to their family unit size may not exceed 125% of the Federal Poverty Level (FPL). Income eligibility determination is based on total family unit income for the thirty-day (30) period immediately preceding the date of application for services. However, the FPL is based on annual income. Annual income can be calculated by multiplying income for the past thirty (30) days by twelve (12) months.

- A. FPL is determined by the Department of Health and Human Services (HHS) and published annually at www.hhs.gov.
- B. HHS publishes the FPL on its website and updates it each January for the current year.
- C. Subgrantees are responsible for using the most recently published FPL and should update these levels as often as they are updated by HHS.

Income Determination

- A. Income Inclusions - Income is the total of:
 - 1. Salaries
 - 2. Wages,
 - 3. Dividends,
 - 4. Interest,
 - 5. Social Security retirement benefits,
 - 6. Unemployment compensation, and
 - 7. Other cash receipts of all family members and other individuals residing in the applicant's house/domicile.
- B. Income Exclusions
 - 1. Temporary Assistance for Needy Families (TANF) and General Assistance (GA) payments,
 - 2. Social Security Disability Insurance (SSDI) payments,
 - 3. Supplemental Security Income (SSI) and training program stipends,
 - 4. Social Security survivor's benefits,
 - 5. Income from unrelated persons such as lodgers, foster children, wards, or employees who reside in the household are separate family units for purposes of CSBG eligibility,
 - 6. Income from emancipated minors who are considered separate family units for calculating income, and
 - 7. Salary or wages earned by children under the age of eighteen residing in the applicant's house or domicile.
- C. Determining Income Eligibility for Wards of the Court, Foster Children and Persons with Disabilities
 - 1. Wards of the Courts: Public funds used to support youths who are wards of the court should not be regarded as income. Certifying documentation may include letters or documents from the court, local family and children service agency or similar organizations stating that the youth is a ward of the court. No other eligibility documentation will be required unless the youth receives some other source of income that falls within the CSBG definition of income.

2. Foster Children: Neither public funds for the youth's support nor the foster family's income should be used for income eligibility determination of foster children. Public support for the youth should be regarded the same as TANF cash assistance payments. Certification may be made by the foster parents, local family and youth services agencies, County Assistance Office (CAO), or similar organizations.

D. Acceptable Documentation of Eligibility and Income

1. Salary or wage statements or W-2 forms,
2. Telephone verification, signed statement, or official document from the CAO or Social Security Administration (SSA) stating the family unit receives TANF, GA, SSI, SSDI, or Social Security retirement payments,
3. Verification of income received from an agency providing subsidized day care services or subsidized housing, or
4. A self-declaration statement, signed and dated by the applicant, or in the case of a minor his/her parent or guardian, certifying that the family unit income does not exceed 125% of the FPL. Additionally, an explanation should be documented in the client file indicating why a self-declaration was used. This method of documentation should only be used for the first 90 days of service. If an applicant does not produce proof of income within 90 days of initial service, a redetermination must be performed, or service may be terminated at the discretion of the agency.

The only exception to income documentation requirements is for services provided by outreach and referral programs.

E. Frequency of Determination

1. Following the initial determination of income eligibility, redetermination must be made annually every 365 days to ensure any major life events such as employment status, birth of a child, divorce, etc., are reflected in the family's eligibility for persons receiving continuous service. Should the agency become aware of a change in the income status of the family/individual, such as an increase in income, a redetermination should be performed as soon as is feasible to redetermine eligibility.
2. Redetermination is necessary if 90 days elapse between initial determination and the start of any program or service.

4.0 Effective Date

This directive takes effect October 1, 2018 and replaces C2016-04. It will remain in effect, in its entirety, until it is amended, replaced, superseded, or nullified. Only a directive from the Department's Center for Community Services or its equivalent may countermand any statement herein contained.

cc: Center for Community Services Staff
Fiscal Management Center, DCED