

NYC Department of Youth and Community Development (DYCD)

Policy and Procedures on Household Income

Verification/Attestation for Programs Utilizing CSBG Funding

The Community Services Block Grant (CSBG) Act requires that in order to participate in programs, services and activities funded by CSBG; all prospective participants must be compliant with the Federal Poverty Guidelines governing household income. Under the CSBG statute, 42 USC§ 9902(2), participants' current household income must be at or below 125% of the prevailing Federal Poverty Guidelines (FPG) to be eligible for services. FPG amounts change annually and may change more than once during a given year as determined by the federal government. **As a result of COVID-19 emergency, the current rate is at or below 200% of FPG and may revert back to the 125% of FPG threshold.** DYCD will promptly inform providers when this occurs. Any participant that does not meet CSBG income eligibility requirements cannot be enrolled in a CSBG funded program. Those prospective participants should be referred to other programs where they meet eligibility requirements.

Providers must screen all prospective participants during the intake process to ensure that the household income is at or below the current federal poverty guidelines prior to enrollment into the program. Household total gross income should be determined by adding together the income of each member of a household. A household includes any individual or group of individuals who are living together as one economic unit. This may include individuals who have a legal obligation to support one another, like a parent or guardian and minor child, and individuals who communally purchase food or share other expenses. The chart below shows examples of income and documentation.

Income	Examples of Documentation
All paid earnings such as wages, salaries, tips, or other income from employment or self-employment.	pay stubs, W-2, current/previous tax documents
Retirement, pension, and/or Social Security (survivor's benefits, disability, or supplemental security income), cash payments from assistance programs such as	Award letters, bank statements, tax documents
public assistance, unemployment insurance, and workers' compensation	Documentation from appropriate government agency

Alimony or child support payments received	Court records, bank statements, child support enforcement letters
Rental income	Tenants' checks, rent receipts, bank statements
Interest, dividends, royalties, or income from estates and trusts	Trust statements, bank records

Depending on the household circumstances and the documentation available, it may be reasonable to calculate income based upon the household's gross income in the past 30 days (multiplied by 12) or based upon a review of the past year. It is recommended that no time shorter than the past 30 days or longer than the past year should be used.

Neighborhood Development Areas (NDAs) and Criteria

According to the New York State Department of State's (NYS DOS) Informational Memorandum with regard to Determining Income Eligibility for CSBG Funded Activities and programs dated April 17, 2023, "subrecipients will not be required to establish or maintain individualized documentation of income eligibility with respect to CSBG services when the location and provision of such services are such that an objective reasonable person would likely conclude that the beneficiaries of such services are generally households with income at or below 200% of the federal poverty guidelines." DYCD's designated Neighborhood Development Areas (NDAs) where low-income New Yorkers concentrate and CSBG services are provided fall into this category.

To maximize the impact of CSBG funding, DYCD targets programs to low-income communities which it designates as NDAs. The City's Department of City Planning collects poverty data for aggregations of census tracts called Neighborhood Tabulation Areas (NTAs). These aggregations, typically of two-five census tracts, create geographic unit large enough to report reliable socioeconomic data, but small enough to capture niches of concentrated poverty within the city and exclude areas with low concentrations.

NTAs that meet the criteria of having 20 percent or more residents with low incomes (defined as living below 125 percent of the FPG) and a minimum size of 4,000 poor residents qualify for inclusion in an NDA. The qualifying NTAs are then parsed into NDAs by aligning them, to the extent possible, within community district boundaries. This method results in 41 NDAs.

DYCD qualifies an area as an NDA if either: (1) at least 30 percent of the area's residents live in households with incomes at or below 125% of the poverty line; or (2) at least 30,000 residents in the area are at or below 125% of the poverty line.

NDA Programs

DYCD uses the FPG as a criterion of eligibility in its delivery of CSBG-funded services within NDAs. NDA programs must collect proof of address to verify residency within the required NDA or any other NDA. At least 80% of the enrolled participants must reside within NDA. All applicants must be screened for household income using the FPG prior to completing the enrollment of participants.

- The provider will request that applicants provide proof of address, such as a lease agreement, utility bill, posted mail with name of applicant.
- The provider will indicate in DYCD's Participant Tracking System (PTS) the type of proof submitted by participants by selecting from a drop-down menu and save a hard copy of the documentation in the student file.
- Participants of NDA High School Program can provide either proof of home address or proof of attendance in a school located in the NDA.
- The participant's household income is assessed and certified for eligibility. A self-attestation form is completed, signed, and dated by provider staff and participant and is placed on file with the program application form.
- The provider will enter each participant's household income into PTS.
- No one with a household income above Federal Poverty Guideline is eligible for CSBG-funded services. Other than earned income from employer, sources of income include social Security, SSI SSD, survivor's benefits, pension, retirement funds, workers compensation, business income, child support payments, alimony payments, foster care payments, armed forces income, and any other income in the home.
- If an applicant indicates having no income at the time of application due to unemployment, they must present documentation of unemployment benefits, such as award letter, monthly benefit statement, printout of recipients account information from the NYS Department of Labor website.
- Other documents that may serve as proof of unemployment include employment termination letters, application for government benefits, and a signed statement of support from other family members.
- While most NDA program participants are expected to reside in the NDA where service is provided, 20% of the annual enrollment may live outside the NDA.
- Program participants who do not reside in an NDA must present proof of household income for review. The provider will indicate the type of income documentation in PTS by selecting from a drop-down menu and will save a hard copy of the documentation in the student file.

City-Wide Programs

CSBG-funded city-wide programs are not specifically required to provide services within NDAs but are required to be compliant with the FPG governing households.

- The provider will need to determine whether program applicants live in an NDA. If the address is within an NDA, applicants must provide proof of address, such as a lease agreement, utility bill, posted mail with name of applicant.
- The provider will indicate in PTS the type of proof submitted by participants by selecting from a drop-down menu and save a hard copy of the documentation in the student file.
- The participant's household income is assessed and certified for eligibility. A self-attestation form is completed, signed, and dated by provider staff and participant and is placed on file with the program application form.
- The provider will enter each participant's household income into PTS.
- No one with a household income above Federal Poverty Guideline is eligible for CSBG-funded services. Other than earned income from employer, sources of income include social Security, SSI SSD, survivor's benefits, pension, retirement funds, workers compensation, business income, child support payments, alimony payments, foster care payments, armed forces income, and any other income in the home.
- If an applicant indicates having no income at the time of application due to unemployment, they must present documentation of unemployment benefits, such as award letter, monthly benefit statement, printout of recipients account information from the NYS Department of Labor' website.
- Other documents that may serve as proof of unemployment include employment termination letters, application for government benefits, and signed statement of support from other family members.
- Those applicants who do not reside in an NDA must present proof of household income for review. The provider will indicate the type of income documentation in PTS by selecting from a drop-down menu and will save a hard copy of the documentation in the student file.

Any provider that does not verify participant income eligibility is at risk of having that participant's fee payment by DYCD disallowed and re-couped.

If a participant's household circumstances change and the provider wishes to switch the participant from another funding source to CSBG, the provider must follow the same income eligibility checking procedures and provide an explanation in the Justification Box.

Summer Youth Employment Program

Summer Youth Employment Program (SYEP) uses the following procedures and processes to determine income eligibility for CSBG funded services.

- a. SYEP Participants complete the SYEP application and indicate if they / the household are receiving Public Assistance
- b. SYEP staff compiles the applications of the participants receiving public assistance and sends it to NYC Human Resources Administration (HRA) where it is verified.
- c. Participants who have been verified on public assistance can be registered for services supported with CSBG funds.

For Public Assistance/TANF purposes, combined current gross income of the applicant's household members must be equal to or less than 200% of the federal poverty level. For claiming purposes, HRA affirms that this income test is automatically met by verifying an applicant is receiving Family Assistance, Safety Net Assistance, Medicaid, SNAP, HEAP or SSI.

CSBG Services for Special Populations

CSBG-funded services may be made available to special populations if they provide documentation from their service provider and complete DYCD's Special Population Self Declaration of Income Form. The Special Population Self Declaration of Income Form must be signed and dated by the applicant and staff of the delegate agency who reviewed and determined the proof provided is acceptable.

Special populations include individuals that are part of any of the following:

1. Victims of Domestic Violence – Domestic abuse is a pattern of coercive, controlling behavior that is a pervasive life-threatening crime affecting people in all communities regardless of gender, age, sexual orientation, race, ethnicity, religion, social standing, and immigration status.
2. Foster Care – Foster care is a government-subsidized and regulated temporary care for children who have been removed from their families for reasons of abuse and neglect.
3. Residents of Emergency or Temporary Shelters– Homeless shelters provide temporary residence for homeless individuals and families.

4. Unhoused (not in a shelter) - Homeless individuals with other housing arrangements than Emergency or Temporary Shelters.

Non-compliance and Consequences

- Providers must comply with CSBG income eligibility requirements to provide services and must produce for review documentation of proof of address and income from participants upon request by DYCD or its State and Federal oversights.
- Failure to maintain appropriate documentation showing the requisite use of the federal poverty line as a criterion of eligibility in the CSBG-funded program will result in disallowances or findings of non-compliance and the provider will be responsible for returning the disallowed amount to DYCD.

To ensure compliance, DYCD policy and procedures regarding CSBG income eligibility requirements will be communicated to providers at the start of services and at periodic provider meetings.