

Introduction

The Tennessee Department of Human Services must establish policies regarding eligibility determination for applicants. For a family or individual to receive services, clients must complete an application and eligibility be determined.

Scope

This policy establishes guidelines to determine if a family or individual is eligible to receives services from CSBG Eligible Entities that are funded under by CSBG.

Policy

A. Eligibility Requirements

To be eligible for CSBG services or benefits, individuals/families must be at or below the specified percentage of the federal poverty line as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by [U.S. Department of Health and Human Services' Poverty Guidelines](#). In addition, all applicants will attest under penalty of perjury that the applicant is either a United States citizen or qualified alien as defined by 8 U.S.C § 1641(b). A family or individual who has not been determined eligible in accordance with the Department's established policies and procedures is ineligible to receive services. Provision of services to an ineligible client shall result in financial penalties.

**These funds are not available to nursing home residents because nursing homes offer 24-hour programs utilizing other Federal funds.*

B. Application

Individuals may apply in the form as made available by the Community Action Agency (CAA). This includes but is not limited to, in-person, mail, online application, or by phone. CAAs may ask individuals specific questions to meet additional intake requirements as determined by the CAA's written policies and procedures. The applicant's failure to provide necessary information for the eligibility determination is cause for rejecting the application. The application form must be completed, and eligibility established prior to the initiation of services. Provision of services to an individual for whom eligibility has not been determined shall result in a financial penalty.

Application requirements:

1. Individuals must have the opportunity to make an application without delay.
2. All applications for services must be processed within thirty (30) calendar days from the date of application.

3. It is required that notification of application approval or denial be provided. The denial notice must be in written form.
4. If eligibility cannot be determined, the applicant must be informed in writing within fifteen (15) calendar days of the date of the decision.
5. The application form must be completed, and eligibility established prior to the initiation of services.
6. Provision of services to an individual for whom eligibility has not been determined shall result in a financial penalty.

C. Eligibility Determination

All points of eligibility (citizenship status and income eligibility) must be verified prior to the client receiving services, with the exception of providing a free-standing information and referral service. The necessary verifications must be obtained within **ten (10) calendar days** of the application date.

- Eligibility determinations for CSBG can be made by the State of Tennessee through EBMS if the case is open and active. Determinations can be made with the associated documentation from:
 - a. Families First
 - b. Medicaid, and/or
 - c. Supplemental Nutrition Assistance Program (SNAP)

Income Eligibility

Persons receiving direct or indirect CSBG services must be within income guidelines. Eligibility for services must be determined either by client self-declaration or by the verification method.

1. Verification Method: The verification method is used for services when monetary payments or tangible benefits purchased with CSBG funds are provided. The effective date of eligibility is the date the agency worker verifies income when the verification method is used.
2. Client Self Declaration: The declaration method can be used for all services unless monetary payments or tangible benefits purchased with CSBG funds are provided. The effective date of eligibility is the date the client signs the application when the declaration method is used.
 - EXCEPTION: If the tangible benefit is donated goods/food, clothing, household necessities, the declaration method can be used to determine eligibility. The applicant's income status shall be entered in the appropriate spaces on the application form.
3. Zero Income: In cases of declaration of zero income, after all avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the attempts at proving eligibility must be contained in the client file, including a statement signed by the applicant indicating that the individual has no other proof of income.

To establish income eligibility the following must also be determined:

1. The number of individuals in the household: A household is defined as any individual or group of individuals living together as one economic unit.
 - EXCEPTION: "Homeless individuals" temporarily residing with another permanent household would be considered as a separated economic unit from the permanent household only when applying for homeless services.

2. The amount of income available to the household: Household income is the total gross income for all individuals in a household. Income is defined as cash receipts earned and/or received by the applicant household before taxes.

Citizenship or Qualified Alien

Determine based upon the applicant's signature and attestation on the application form whether he or she is claiming to be a citizen or a qualified alien.

Request that the applicant present ONE (1) of the following documents to verify his or her citizenship for each participant requesting assistance:

1. A valid Tennessee driver license or photo identification license issued by the Department of Safety; or a valid driver license or photo identification license from another state where the issuance requirements are at least as strict as those in Tennessee, as determined by the Department of Safety;
2. An official birth certificate issued by a U.S. state, jurisdiction or territory, including Puerto Rico, U.S. Virgin Islands, Northern Mariana Islands American Samoa, Swains Island, Guam; provided, that Puerto Rican birth certificates issued before July 1, 2010, shall not be recognized under this subdivision (c)(2);
3. A U.S. government-issued certified birth certificate;
4. A valid, unexpired U.S. passport;
5. A U.S. certificate of birth abroad (DS-1350 or FS-545);
6. A report of birth abroad of a citizen of the U.S. (FS-240);
7. A certificate of citizenship (N560 or N561);
8. A certificate of naturalization (N550, N570 or N578);
9. A U.S. citizen identification card (1-197, 1-179);
10. Any successor document of subdivisions (c)(4)-(9); or
11. Social Security Card

Request that the applicant present two (2) forms of documentation to verify identity and immigration status for each participant requesting assistance as determined by the U.S. Department of Homeland Security to be acceptable for verification through the [SAVE program](#). Immigration status documentation may include:

1. Arrival/Departure Record (Form I-94)
2. Permanent Resident Card (Form I-551)
3. Employment Authorization Document (Form I-766)
4. Foreign Passport and Visa

If an applicant who claims eligibility as a qualified alien is unable to present two (2) forms of documentation, then the applicant shall present at least one (1) such document that the entity or local health department shall then verify through the SAVE program.

Any document submitted as citizenship verification shall be presumed to be proof of an individual's eligibility until a final verification is received by the state governmental entity or local health department, and no entity or local health department shall delay the distribution of any federal, state, or local benefit based solely on the pendency of final verification. Upon receipt of a final verification that indicates the applicant is not a U.S. citizen or qualified alien, the state governmental entity or local health department shall terminate any recurring benefit and shall pursue action applicable against the applicant under the Tennessee Medicaid False Claims Act or the False Claims Act at Title 4, Chapter 18.

D. Proof of Income

Current income is defined as the total income received by the household within the past thirty (30) days of the CSBG application date.

Acceptable Forms of Income Verification:

1. All income, including fixed income, for the family or individual must be documented at the time of application and at each redetermination. Caution: Fixed income must be verified along with other income, for all services requiring verification. The income will be either declared or verified according to the method of eligibility determination used.
2. Income verification must show proof of current and representative income.
3. Each individual income verification must identify the applicant by either his/her name and/or Social Security Number.
4. Zero Income: It is necessary to obtain confirmation when a household unit has zero income. A current employer separation letter is acceptable when verifying zero income (within 30 days). Any household member eighteen (18) years and older claiming zero-income must have a Self-Declaration of Zero Income Statement signed by the Head of Household. All eligible entities will use the self-declaration statement even if household members are listed in EBMS or provide a current employer separation letter. After all avenues of documenting zero income are exhausted, a written self- declaration is permissible (SEE PROCEDURE MANUAL WITH FURTHER DETAILED INFORMATION).

E. Period of Certification

There are two types of services that can be provided: intangible services and tangible services. When an intangible service is provided, a certification period must be established at the point that eligibility is determined. For tangible services *only*, it is sufficient to establish client eligibility, and a certification period is not required.

The circumstances of a client may change during the certification period. If the client reports a change or the agency has reason to believe that a change is likely, eligibility must be determined **within thirty (30) calendar days** of the change being reported. The change may relate to household size or income.

The two types of services are as follows:

1. Tangible services - This type of transactional service involves the provision of a tangible benefit to an individual or a family on a one-time basis. Agencies may determine the number of tangible services a client is eligible for during a certain period; however, eligibility must be determined for each separate tangible service.
 - a. Once the individual or family has been determined eligible, and the benefit has been provided, the service delivery process is completed.

- b. To provide ongoing tangible services, it must be paired with an intangible service.
2. Intangible services - This type of service includes the performance of multiple services on the client's behalf over a period of time. This requires a certification period.
 - a. Intangible services by their nature extend over a period of time; and a certification period, specifying the length of time over which a client will be eligible to receive services, must be established.
 - b. Certification: An eligible client may be certified for any period of time extending up to but **no longer than twelve (12) months** from the date eligibility was established.
 - c. Multiple tangible services are allowable when paired with an intangible service. The agency should clearly document the services and threshold amount the client is eligible for.

F. Depletion of Funding

When funding is depleted, it is appropriate to deny clients based on lack of funds. The agency will inform the client when the next open application period begins. Agencies shall not deny clients until all funds are depleted. A waiting list shall be maintained of all CSBG applicants denied due to lack of funds. If additional funds become available during the program year, those CSBG applicants who were denied due to lack of funds shall be notified of the change.

G. State of Emergency/Crisis Management

Per [CSBG Information Memorandum \(IM\) 154](#), TDHS will follow Section 673(2) of the CSBG Act concerning flexibility with CSBG funding to support agency disaster responses within existing funding allocations, if the use of such funds aligns with the statutorily allowable activities.

In the case of an emergency, the Tennessee Department of Human Services (TDHS) will provide Tennessee's network of Community Services Block Grant (CSBG)-eligible CAAs with guidance to aid in service delivery during a time of emergency circumstances through State of Emergency Guidance Memorandum.

H. Grievance Procedure

The grant contract requires agencies to establish a system through which recipients of service may present grievances about the operation of the service program. This procedure must be explained to each client or his/her representative if he/she is not competent to understand it, at the time service is initiated. To demonstrate compliance with this provision, the agency must have a written policy which explains how the procedure will be implemented with its clients. Each contract agency shall submit a copy of the grievance procedure and any related forms for filing grievance with the CSBG Application and Community Action Plan.

If an application is denied, a letter must be sent to all applicants stating that their application has been denied. Also, the letter must state the correct procedures to follow for an appeal of an application denial through the agency's established grievance procedures.

The right to appeal is provided to ensure due process for those individuals and families who are denied assistance under any of TDHS programs including CSBG. Each agency's Board of Directors shall establish procedures for fair hearings at the local level.

Supporting Documents

[U.S. Department of Health and Human Services Poverty Guidelines](#)

[About SAVE | USCIS](#)

[SAVE Agency Search Tool Guide](#)

[CSBG IM #154 Disaster Flexibilities and Waivers | The Administration for Children and Families](#)

[Community Services Block Grant \(CSBG\) Federal Poverty Level and Customer Eligibility](#)

[16.10-25.02 CSBG Application Requirements](#)

[16.10-25.03 CSBG Financial Eligibility Determination](#)

[16.10-25.04 CSBG State System Access Process](#)

Definitions/Acronyms

Term	Definition
CAA	Community Action Agency
CSBG	Community Services Block Grant
Current Income	The total income received by the household within the past thirty (30) days of the CSBG application date.
EBMS	Eligibility Benefit Management System
Household	Any individual or group of individuals living together as one economic unit.
Household Income	The total gross income for all individuals in a household.
Income	Cash receipts earned and/or received by the applicant household before taxes.
TDHS	Tennessee Department of Human Services

Supersedes


Community Services Block Grant (CSBG) Policy & Procedure Manual, eff. date 10/1/23; Section 3: CSBG Eligibility Policy pgs. 16-19

Approval History

Approved By	Approver Title	Approved Date	Effective Date
Clarence H. Carter	Commissioner	06/26/2025	10/01/2025

Revision History

Date	Version	Location of Change	Description/Reason for Change
06/26/2025	10/01/2025	Policy Section	This policy was created to incorporate information from CSBG Policy and Procedure Manual to an individual policy document.

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