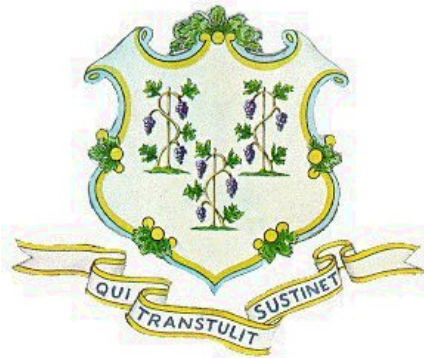




State of Connecticut

2019-2020 Action Plan
Second Amendment - CV2 Funding
for
Housing and Community Development
CARES Act Funding



Submitted to the
U.S. Department of Housing and Urban Development
by the
State of Connecticut

September 1, 2020

**State of Connecticut
2019-2020 Action Plan
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I. EXECUTIVE SUMMARY

A. OVERVIEW

This is the second amendment to the fifth Annual Action Plan under the State of Connecticut's 2015-19 Consolidated Plan for Housing and Community Development (ConPlan), the five-year plan addressing Connecticut's housing and community development needs. The program year for the annual Action Plan is based on the state fiscal year, July 1 - June 30. This second amendment is for the 2019-2020 Annual Action Plan for the state fiscal year July 1, 2019 to June 30, 2020 and is specifically intended to address funding received as part of the second tranche of allocation due to COVID-19.

In accordance with the CARES Act, funds are being distributed under the Community Development Block Grant (CDBG) program, and the Emergency Solutions Grant (ESG) program to assist individuals and families in the prevention and spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19.

Under the Cares Act, the following table details the funding allocated to the State of Connecticut under the Cares Act, including both the first and second tranche for the CDBG and ESG programs. CARES funding allocated by Congress and HUD to the State of Connecticut is \$40,395,417.

CARES Funding Allocated to the State of Connecticut			
FUNDING	SC CDBG-CV	ESG-CV	HOPWA-CV
STATE OF CT Tranche One	\$8,138,549	\$8,159,579	\$38,662
STATE OF CT Tranche Two	\$11,467,321	\$12,591,306	-
Total Funding	\$19,605,870	\$20,750,885	\$38,662

II. CITIZEN PARTICIPATION

In response to the COVID-19 Pandemic, the Department of Housing (“DOH”) amended its Citizen Participation Plan, to promote and support “social distancing” while continuing to offer the public an opportunity to provide valuable citizen input and insight into the policies, and procedures of the Department of Housing, particularly as it relates to the administration and implementation of its federal programs. In accordance with the State’s Amended Citizen Participation Plan, the following process was used to solicit citizen participation and input into the programmatic amendments necessary to quickly and effectively administer federal funding made available either directly or indirectly as a result of the COVID-19 Pandemic.

The Draft Annual 19-20 Action Plan Second Amendment – CV2, was posted on the Department’s website, along with a notice identifying the availability of the amendment. The Notice included the opportunity to provide electronic comment for the required period of not less than five days between July 30, 2020 – August 4, 2020 and information on participation in a “virtual public hearing” that was begun on August 4th at 3:00 PM. As part of the Notice, the state included information on how citizens who have special needs may obtain the Amendment in a form that is accessible to them.

The Public Notice was published in four (4) newspapers of general circulation, and included at least one (1) minority publication.

Copies of the Notice were emailed to all interested parties who had registered with the Department as part of its “Community Partners” list, as well as the governmental leaders of all 169 towns/cities in the State, and the seven (7) councils of government.

Comments received, either at the virtual public hearing or during the public comment period will be considered by the agency before the final amended action plan is submitted to HUD. All comments received will be summarized and responded to in Attachment A.

Due to tropical storm Isaias, this event was started, but not completed. A second virtual public hearing was scheduled for August 27, beginning at 11:00 am. Notices of the virtual event were sent to all original attendees on August 4th, as well as to all individuals or

organizations that provided written comment prior to August 4th. A general Notice of Virtual Public Hearing was posted on the Department website on August 20th, with information on how to participate. Copies of the Notice were emailed to all interested parties who had registered with the Department as part of its “Community Partners” list, as well as the governmental leaders of all 169 towns/cities in the State, and the seven (7) councils of government.

Comments received, either at the virtual public hearings or during the public comment period will be considered by the agency before the final amended action plan is submitted to HUD. All comments received will be summarized and responded to in Attachment A.

DOH provided the Draft 19-20 Annual Action Plan Amendment and public hearing/public commentary schedule to members of the state legislature who sit on committees of cognizance over matters related to housing, and state finances.

In addition, consultation was sought from CT Balance of State (BOS) Continuum of Care (CoC) Steering Committee. Members of that Steering Committee were notified of the virtual public hearing to be held and encouraged to attend.

Outline of Activity for Public Hearings/Public Comment:

Please see Attachment A-3 Summary of Public Comments Received and DOH Responses.

III. FEDERAL REQUIREMENTS

A. Resources

In accordance with the CARES Act, Federal resources are being distributed to address some of the needs being created by COVID-19. This 2019-2020 Annual Action Plan Amendment outlines the additional COVID-19 funding the State of Connecticut will receive for the following grant programs: Community Development Block Grant (CDBG) program, the Emergency Solutions Grant (ESG) program and the Housing Opportunities for People with AIDS (HOPWA) program. Details on how the state will address the prevention, preparation, and response to the Coronavirus are found in the program-specific sections of this report.

This 2019-2020 Annual Action Plan Second Amendment – CV2 provides a detailed plan for expending the COVID-19 funds for the following federal programs:

Small Cities Community Development Block Grant (SC CDBG-CV2)	\$ 11,467,321
Emergency Solutions Grant (ESG-CV2)	\$ 12,591,306

While the state cannot anticipate what other public or private funds may become available to support the crisis, the state will endeavor to maximize and leverage the use of any such resources as they become available.

B. Activities

The state's methods of distributing funds and carrying out activities funded by HUD are described in the program-specific sections that follow. SC CDBG-CV funds will be administered through a modified application process to expedite funding and delivery of targeted services. Application submissions will be accepted electronically. In addition, the State reserves the right to undertake activities directly, in accordance with paragraph III.B.6.(b)(i) of the [Docket No. FR-6218-N-01] Notice of Program Rules, Waivers, and Alternative Requirements Under the CARES Act for Community Development Block Grant Program Coronavirus Response Grants, Fiscal Year 2019 and 2020 Community Development Block Grants, and for Other Formula Programs.

In accordance with the enactment of the CARES Act, the 15% public services cap has no effect on SC CDBG-CV grants and no effect on FY 2019 and 2020 CDBG grant funds used for coronavirus efforts. It is strongly recommended that applicants work with local social service organizations, Continuum of Care (“CoC”)/Coordinated Access Networks homeless providers, health departments, and other providers to identify specific local needs. Specifically for the CDBG-CV2 funding, DOH will be offering the opportunity to apply to both entitlement and non-entitlement communities. DOH intends to contract with 44 shelters that currently receive assistance from DOH through ESG, state Emergency Shelter Service (“ESS”) program, and the federal Social Service Block Grant (“SSBG”) program based on activities that prevent, prepare for, and/or respond to COVID-19 pandemic. Other activities are detailed in the ESG specific section of this plan.

C. Geographic Distribution

1. Funding under SC CDBG-CV2 will be available to all eligible entitlement and non-entitlement communities in accordance with program requirements. Communities that have demonstrated greater need with the prevention, preparation for, and response to the COVID-19 pandemic will be given higher priority. In addition, the State may exercise its right to administer activities directly, and will make every effort, if it chooses to do so, to make eligible activities available on a statewide basis.
2. With respect to ESG-CV2, DOH will make awards based on the needs formula noted above and consistent with the other eligible activities identified in Section C of this Action Plan.

D. Homelessness and Other Special Needs Populations

The additional SC CDBG-CV2 and ESG-CVs funding addressed in this plan will be utilized for the prevention, preparation for and response to the COVID-19 pandemic, with a priority to assist individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homeless prevention activities to mitigate the impacts of COVID-19.

IV. PROGRAM ACTIVITIES

A. Small Cities Community Block Grant - CARES (SC CDBG-CV2) Program

The objective of the Community Development Block Grant – CV2 Program is to prepare for, prevent and respond to the COVID-19 Pandemic. To achieve these goals, the CARE Act outlines eligible activities and national objectives that each activity must meet.

The CDBG – CV2 Program is administered by the United States Department of Housing and Urban Development (“**HUD**”). Within the State of Connecticut, the Department of Housing (“**DOH**”) is designated as the principal state agency for the allocation and administration of CDBG – CARES funding (“**SC CDBG-CV**”).

1. FY 2019-20 Resource Allocation Plan for SMALL CITIES CDBG-CV2 Program

HUD funding for Connecticut’s SC CDBG-CV2 program is \$11,467,321. Any future changes in Connecticut’s SC CDBG-CV funding allocations will be a direct result of funding modifications to the CDBG program nationally.

All eligible activities that serve to prepare for, prevent or respond to the COVID-19 Pandemic, as determined by HUD, and in accordance with the most recent federal guidance, are available for funding.

In addition, in accordance with paragraph III.B.6.(b)(vi) of the [Docket No. FR-6218-N-01] Notice of Program Rules, Waivers, and Alternative Requirements Under the CARES Act for Community Development Block Grant Program Coronavirus Response Grants, Fiscal Year 2019 and 2020 Community Development Block Grants, and for Other Formula Programs, a state may use up to 7 percent of its CDBG-CV grant combined for general administration and technical assistance costs; of that 7 percent, a state may use up to 5 percent of CDBG-CV funds for general administration costs and up to 2 percent of the grant for technical assistance activities. The remainder of the amount may be used by units of general local government for administrative and technical assistance costs, provided that a state and its funded units of general local government and subrecipients expend no more than 20 percent of the CDBG-CV grant for planning, management, and administrative costs.

Summary of Appropriations and Proposed Allocations – CV2	
Small Cities CDBG-CV2	FFY 19 (SFY 20)
Small Cities CDBG-CV Award	\$11,467,321
PLUS	
Reprogrammed Funds/Program Income	\$0
Reprogrammed 1% TA Funds	\$0
EQUALS	
Total Funding Available	\$11,467,321
MINUS	
Administrative Authorization (5% of Award)	\$573,366
Technical Assistance (2% of Award)	\$286,683
EQUALS	
Total CDBG funding available for awards to Grantees	\$10,607,272

Summary of Appropriations and Proposed Allocations – CV1	
Small Cities CDBG-CV1	FFY 19 (SFY 20)
Small Cities CDBG-CV Award	\$8,138,549
PLUS	
Reprogrammed Funds/Program Income	\$0
Reprogrammed 1% TA Funds	\$0
EQUALS	
Total Funding Available	\$8,138,549
MINUS	
Administrative Authorization (5% of Award)	\$406,927
Technical Assistance (2% of Award)	\$203,463
EQUALS	
Total CDBG funding available for awards to Grantees	\$7,528,159

2. Reprogramming of Funds

During the FY, DOH may recapture funds from previous fiscal years. Any reprogrammed funds obtained during the FY will be reallocated as noted above. Recaptured funds may come from:

- Non-performing grantees; and
- Grantee's underutilized funds.

Funds may be reallocated during the FY based on demand and or emergency situations. In the event that additional funds are allocated that affect Connecticut's initial allocation and/or are recaptured from other states and reallocated to Connecticut during the FY, these funds will be distributed in accordance with the Action Plan guidelines in effect as of the date of reallocation.

3. Eligible Use of Funds

Except for a limited amount of funds for its own CDBG-related administrative expenses, each state must distribute the Small Cities CDBG to units of general local governments in non-entitlement areas. In addition, under CDBG-CV, states may also carry out activities directly, as previously noted. Each state must also ensure that at least 70% of its Small Cities CDBG funds are used for activities that benefit low- and moderate-income persons over a one, two, or three-year time period selected by the state. The 70% requirement applies to each state's Small Cities CDBG Program as a whole and does not apply to each individual grant Small Cities CDBG to a unit of general local government.

All activities must meet one of the following national objectives for Small Cities CDBG: benefit low-and moderate-income persons; prevention or elimination of slums or blight; and community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community. A need is considered urgent if it is sudden and unexpected, has arisen in the past 18 months and no other funding is available to address it.

In accordance with the enactment of the CARES Act, the 15% public services cap has no effect on CDBG-CV grants and no effect on FY 2019 and 2020 CDBG grant funds used for coronavirus efforts.

Activities that can be funded with CDBG – CARES allocation are detailed in the CDBG Quick Guide, which can be viewed at the HUD Exchange website. (<https://files.hudexchange.info/resources/documents/Quick-Guide-CDBG-Infectious-Disease-Response.pdf>)

As previously noted, funding under SC CDBG-CV2 will be available to all eligible entitlement and non-entitlement communities in accordance with program requirements. In addition, the State reserves the right to carry out CDBG-CV eligible activities directly. Communities that have demonstrated greater need with the prevention, preparation for, and response to the COVID-19 pandemic will be given higher priority.

4. The Housing and Community Development Act of 1974 (as amended)

The primary objective of the Act, as amended, is the development of viable urban communities by providing decent housing, a suitable living environment and expanding economic opportunities, principally for families and persons of low- and moderate-income. In order to meet these objectives, the federal government has established three National Objectives for the CDBG-SC Program. Every activity must meet one of the three national objectives listed below:

- To benefit low- and moderate-income families;
- To aid in the prevention or elimination of slums or blight; and
- To alleviate existing conditions that poses a serious and immediate threat to the health or welfare of the community (Urgent Need).

Communities can meet a national objective through one of the following:

- Low- and Moderate-Income Benefit:
 - Area benefit (e.g., streets and sidewalks¹), where at least 51% of the population in the defined area is of low- and moderate-income; or
 - Limited clientele (e.g., seniors or persons with disabilities²); or
 - Direct benefit (e.g., housing rehabilitation and job creation³).
- Slum and Blight:
 - Prevention or elimination on an area basis; or
 - Prevention or elimination on a spot slum and blight basis.
- Urgent Need:
 - Sudden and unexpected need;
 - Threat to the health and welfare of the community;
 - Occurred within 18 months; and
 - No other funds available.

5. Waivers

¹ The items mentioned represent a limited set of examples of activities that qualify under eligible area benefit activities. This limited set has been provided for illustrative purposes only and does not indicate or imply any imposed limitations. For a complete definition of eligible area benefit activities please refer to Title 24, Part 570, Sub-Part C, Section 570.208 of the Code of Federal Regulations.

² The items mentioned represent a limited set of examples of activities that qualify under eligible limited clientele activities. This limited set has been provided for illustrative purposes only and does not indicate or imply any imposed limitations. For a complete definition of eligible limited clientele activities please refer to Title 24, Part 570, Sub-Part C, Section 570.208 of the Code of Federal Regulations.

³ The items mentioned represent a limited set of examples of activities that qualify under eligible area benefit activities. This limited set has been provided for illustrative purposes only and does not indicate or imply any imposed limitations. For a complete definition of eligible area benefit activities please refer to Title 24, Part 570, Sub-Part C, Section 570.208 of the Code of Federal Regulations.

On March 31, 2020, HUD issued a Memorandum identifying the availability of certain waivers of Community Planning and Development Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.

Subsequently, HUD issued [Docket No. FR-6218-N-01] Notice of Program Rules, Waivers, and Alternative Requirements Under the CARES Act for Community Development Block Grant Program Coronavirus Response Grants, Fiscal Year 2019 and 2020 Community Development Block Grants, and for Other Formula Programs, published on August 20, 2020.

These memos explain the availability of waivers of certain regulatory requirements associated with several Community Planning and Development (CPD) grant programs to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19.

It is the intention of the Department to take advantage of any/all waivers that apply to the administration of its program, and will follow the guidance provided by HUD relative to their notification of such intent.

6. Matching Requirement

In accordance with the waiver noted above, with respect to any COVID funds allocated to the Department, the state is not required to pay from its own resources all administrative costs incurred by the state in carrying out its responsibilities under subpart 24 CFR 570.489(a)(1). A state may use up to 7 percent of its CDBG-CV grant combined for general administration and technical assistance costs; of that 7 percent, a state may use up to 5 percent of CDBG-CV funds for general administration costs and up to 2 percent of the grant for technical assistance activities.

7. Federal Requirements

The following federal legal requirements also apply to the Small Cities CDBG - CARES program: Davis Bacon, National Environmental Policies Act (including 24 CFR Part 58 Environmental Review Procedures), Relocation Act, and Fair Housing Act.

8. Administration of These Funds

Adequate advance notice of fund availability will be provided and DOH reserves the right to cease accepting applications at any time that all available funds have been committed. Based on funding availability and other considerations, DOH may limit the number of applications that can be submitted by a municipality in a funding round. In addition, as previously noted, the State reserves the right to carry out eligible activities directly, if circumstances warrant.

9. SC CDBG-CV2 Application Process

For SC CDBG-CV2 funds being distributed by DOH, a modified application process has been established to expedite funding and delivery of targeted services. These applications will be rated and ranked in accordance with the priorities identified in this Action Plan. Application submissions will be made electronically. DOH strongly recommends working with local social service agencies, your Continuum of Care (CoC)/Coordinated Access Networks homeless providers, health departments, and other providers to identify specific local needs.

Applications must be submitted electronically, and may be submitted immediately upon receiving HUD approval of the Amendment to the Action Plan.

DOH has established the following program eligibility and threshold requirement standards for applicants. These program eligibility and threshold requirement standards are applicable to all applicants and activities unless otherwise noted:

- Eligible Applicants - As defined by HUD program regulations; *Non-profit organizations – letter application MUST come from city or county, but the money can be sub-granted to a non-profit to carry out the activity*
- Eligible Activity - Only “activities”, as defined by this Allocation Plan;
- National Objective - Each proposed activity must meet at least one national objective and must be fully supported within the application;
- Citizen Participation - Applicant must provide certification of compliance with amended citizen participation criteria;
- Consistency with the Consolidated Plan - Applicant must identify how the project is consistent with the goals and strategies of the Consolidated Plan;
- Fair Housing and Equal Opportunity Compliance - Applicant must submit a Fair Housing Action Plan that complies with DOH’s guidelines/policies;

During the application evaluation process, DOH will conduct due diligence and evaluate all eligible applications using the evaluation criteria described below. Depending on the nature of the proposed activity, site inspections may be conducted by DOH staff. An evaluation of the site's feasibility is completed and considered as part of the application's final review.

Final application recommendations will be made to the Commissioner's Office, based on the overall need identified in the application and compliance with threshold. Applicants will receive written notification after final decisions are made. To the extent feasible, unsuccessful applicants may be offered the option to have a debriefing meeting.

10. Evaluation Criteria for SC CDBG-CV2 Funding

All otherwise CDBG eligible activities that prepare for, prevent or respond to the COVID-19 pandemic are eligible, and will be considered.

B. Emergency Solutions Grants – Coronavirus (ESG-CV2)

Under the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act"), Public Law 116-136, special Emergency Solutions Grants - Coronavirus ("ESG-CV") funds have been allocated. Given the immediate needs faced by our communities, HUD has announced the second allocation of ESG-CV2 funds. These special ESG-C2V funds are required to be used to prevent, prepare for, and respond to the COVID-19 pandemic among individuals and families who are homeless or receiving homeless assistance; and to support additional homelessness prevention activities to mitigate the impacts of COVID-19.

This second distribution of funds to the State of Connecticut, in the amount of \$12,591,306, is being administered by the Department of Housing ("DOH") under this substantial amendment to the Action Plan for the program year beginning July 1, 2019. Should the amount of the allocation by the federal government be greater or lesser than the anticipated allocation denoted, these funds will be distributed on a prorated basis among the activities identified in the section below.

HUD has the ability to reallocate funding based on demand and/or emergency situations. In the event that additional funds are allocated that affect DOH's initial allocation and/or are recaptured from other states and reallocated to DOH, these funds will be distributed in

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accordance with the most current ESG-CV guidelines published by HUD that are in effect as of the date of such reallocation.

DOH regularly consults with the Connecticut Coalition to End Homelessness, Inc. for the provision of technical assistance, programmatic training needs, program development service model recommendations and program evaluation. In addition, DOH consulted with the four ESG entitlement communities regarding their plans for ESG-CV funding in order to better coordinate the administration of these funds.

1. Second Distribution of Funds from HUD:

This second distribution of ESG-CV2 funds are subject to the following flexibilities and conditions provided by the CARES Act:

- The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19;
- The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- Up to 10 percent of funds may be used for administrative costs, as opposed to 7.5 percent as provided by 24 CFR 576.108(a);
- The funds are exempt from the ESG match requirements, including 24 CFR 576.201;
- The funds are not subject to the consultation and citizen participation requirements that otherwise apply to the Emergency Solutions Grants, however each recipient must publish how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media;
- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD's Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the "at risk of homelessness" definition in 24 CFR 576.3;
- That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;
- Treatment and supportive services when necessary to assist vulnerable homeless

populations, individuals and families experiencing homelessness are encouraged, however such recipients must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).

- In addition, the Act authorizes the Secretary to grant waivers of and specify alternative requirements for statutes and regulations the Secretary administers in connection with the use of ESG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). These waivers and alternative requirements can be issued when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

Consistent with current DOH practices and funding streams, provides a variety of are experienced, well established in their communities and provide quality services, which are monitored on a regular basis. The variety of funding streams, including both state and federal resources, enables these organizations to provide shelter beds, case management services and rapid re-housing services to homeless persons. These funds address operational costs, essential services such as counseling, case management, health, education, employment and training as well as HMIS costs and rapid re-housing.

In addition, DOH regularly consults with the Connecticut Coalition to End Homelessness, Inc. for the provision of technical assistance, programmatic training needs, program development service model recommendations and program evaluation.

2. Eligible Activities for Second Distribution of ESG-CV2

Consistent with the flexibilities and conditions of the ESG-CV2 funding, the table below identifies the activities that the Department intends to fund, all of which are necessary to prevent, prepare for, and respond to the coronavirus pandemic (“COVID-19”) among individuals and families who are homeless or receiving homeless assistance; and to support additional homelessness prevention activities to mitigate the impacts of COVID-19.

Summary of Activities for First and Second Distribution of ESG-CV

ESG-CV2 Funded Activity	Allocation to be Awarded
Expansion of Rapid Rehousing	\$ 7,591,306
Case Management to Support Rapid Rehousing	\$ 1,000,000
Eviction Prevention	\$ 5,309,579
Expansion of Shelter Funding – Operations and Activities	\$ 3,250,000
Homeless Outreach Activities	\$ 1,000,000
Homeless Diversion Activities - New	\$ 1,250,000
Additional Staff for CAN and Entry through 2-1-1	\$ 1,250,000
Telehealth Technology - New	\$ 100,000
DOH Administrative Costs (Eligible for up to 10%)	\$ -0-
Total Funds in First and Second Distribution	\$ 20,750,885

3. Program Descriptions for New Eligible Activities for ESG-CV2

Case Management to Support Rapid Rehousing (“RRH”)

The Rapid Rehousing Program assists with housing search, placement and stabilization support services. It can provide eligible participants with short-term or long-term rental assistance to assist them in obtaining an individual apartment. Eligible participants are low or very low income individuals and/or families who are literally homeless.

The goal of RRH is to house eligible participants within 45 days of intake, however, eligible participants will not be discharged from the program if they cannot not meet this goal.

Eligible services include:

- Housing search and placement for eligible participants
- Allowable direct financial assistance, as detailed below:
 - security deposit

- up to 12 months of rental assistance
- moving expenses
- up to 6 months of utility arrearages (the last 6 months of arrears)
- Housing inspections
- Stabilization case management services, including, but not limited to:
- Accessible, flexible support services such as budgeting, and vocational/educational counseling. Frequency of case management will be dependent on the needs assessment and housing stabilization plan developed for each eligible participant.

A “harm reduction philosophy” will be implemented for participants who have relapsed from substance abuse or continue to abuse substances, so that health care, support and housing continue to be provided to the participant.

For the purposes of Case Management to Support Rapid Rehousing under ESG-CV2, DOH intends to provide funding to support additional staffing to provide case management services associated with all aspects of the Rapid Rehousing process, including post occupancy case management.

Homeless Diversion (New)

Homeless Diversion is a strategy that prevents homelessness at the front door of the homelessness response system by helping people identify immediate alternative housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Every effort should be made to divert clients to other housing solutions at their first contact with the homelessness response system.

Funds would be used to hire and train Diversion Specialists to provide services to clients in order to prevent their entry into the homelessness system, as well as to provide direct assistance to clients. The services to be provided would include counseling (housing and financial), legal intervention and assistance, mediation, the ability to act as a fiduciary in the administration of a pool of funds to cover overdue rent payments, related interest and fees, unpaid utilities, security and/or utility deposits.

Homeless/Street Outreach

Although the Department does not anticipate allocating any of this first allocation of ESG-CV funding, it reserves the right to allocate funds from any future ESG-CV allocations to increased homeless outreach activities necessary to prepared for, respond to or to prevent the spread of COVID-19.

These activities are designed to meet the immediate needs of unsheltered homeless people by connecting them with emergency shelter, housing, and/or essential services. This may include, but is not limited to connecting them with emergency shelter, housing, and providing them with urgent, non-facility-based care, mental health services, substance abuse treatment, medical care, financial assistance, child care, or employment services, transportation, and services for special populations.

DOH Administrative Costs

Although the Department does not anticipate allocating any of this first allocation of ESG-CV funding, it reserves the right to allocate funds from any future ESG-CV allocations to cover additional eligible administrative costs.

4. Grant Provisions

On March 31, 2020, HUD issued a Memorandum identifying the availability of certain waivers of Community Planning and Development Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.

Subsequently, HUD issued [Docket No. FR-6218-N-01] Notice of Program Rules, Waivers, and Alternative Requirements Under the CARES Act for Community Development Block Grant Program Coronavirus Response Grants, Fiscal Year 2019 and 2020 Community Development Block Grants, and for Other Formula Programs, published on August 20, 2020.

These memos explain the availability of waivers of certain regulatory requirements associated with several Community Planning and Development (CPD) grant programs to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19.

It is the intention of the Department to take advantage of any/all waivers that apply to the administration of its program, and will follow the guidance provided by HUD relative to their notification of such intent.

VI. ATTACHMENTS TO THE 2019-20 ACTION PLAN

Attachment A – Citizen Participation

- Attachment A-1 Amended Citizen Participation Process
- Attachment A-2 Outline of Activity for Virtual Public Hearing/Public Comment
- Attachment A-3 Summary of Public Comments Received and DOH Responses

Attachment B – Citizen Participation Documents

- Attachment B-1 Legal Notice for Virtual Public Hearing and Public Comment Period for the development of 2019-2020 Annual Action Plan Amendment
- Attachment B-2 Virtual Public Hearing Recording
- Attachment B-3 Written Comments

Attachment A – Citizen Participation

- Attachment A-1 Amended Citizen Participation Process
- Attachment A-2 Outline of Activity for Virtual Public Hearing/Public Comment
- Attachment A-3 Summary of Public Comments Received and DOH Responses

Attachment A-1**Citizen Participation Plan – Amendments to Existing Plans**

In response to the COVID-19 Pandemic, the Department of Housing (“DOH”) is amending its Citizen Participation Plan, to promote and support “social distancing” while continuing to offer the public an opportunity to provide valuable citizen input and insight into the policies, and procedures of the Department of Housing, particularly as it relates to the administration and implementation of its federal programs. The following process will be used to solicit citizen participation and input into any programmatic amendments necessary to quickly and effectively administer federal funding made available either directly or indirectly as a result of the COVID-19 Pandemic.

- Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for a period ending June 30, 2021, community input prior to drafting a substantial amendment to any plan will be waived, including but not limited to an approved consolidated plan or annual action plan concerning the proposed uses of CDBG, HOME, NHTF, ESG and HOPWA funds.
- Staff will prepare an amendment to any respective plan, where applicable, and the amendment shall include a discussion of the amount of assistance the state expects to receive, the range of activities it will undertake with this assistance, and, to the extent possible, the benefit to low and moderate income people of these proposed activities.
- The Amendment will be posted in a prominent place on the Department’s website, along with a notice identifying the availability of the amendment. The Notice will include the opportunity to provide electronic comment for a period of not less than five days and information on participation in a “virtual public hearing”. As part of the Notice, the state will provide information on how citizens who have special needs may obtain the Amendment in a form which is accessible to them.
- Such Notice will be published in at least three (3) newspapers of general circulation, and will include at least one (1) minority publication.
- Copies of the Notice will be emailed to all interested parties who have registered with the Department as part of its “Community Partners” list, as well as the governmental leaders of all 169 towns/cities in the State, and the seven (7) councils of government.
- Any comments received, either at the virtual public hearing or during the public comment period will be considered by the agency before the final amended action plan is submitted to HUD. A summary of the comments and the agency's responses will be an attachment to the final amended action plan.
- The procedures and actions discussed above will constitute the state's citizen participation plan for any substantial amendments, which may need to be made in the course of the

program year. A "substantial amendment" to the plan is one which implements a change the use and/or method of distributing those funds.

- This amended citizen participation plan will itself be made available to the public for a five day public comment period prior to implementation, and any interest groups may review and comment accordingly.

A-2 Outline of Activity for Virtual Public Hearing/Public Comment

In response to the COVID-19 Pandemic, the Department of Housing (“DOH”) amended its Citizen Participation Plan, to promote and support “social distancing” while continuing to offer the public an opportunity to provide valuable citizen input and insight into the policies, and procedures of the Department of Housing, particularly as it relates to the administration and implementation of its federal programs. In accordance with the State’s Amended Citizen Participation Plan, the following process was used to solicit citizen participation and input into the programmatic amendments necessary to quickly and effectively administer federal funding made available either directly or indirectly as a result of the COVID-19 Pandemic.

The Draft Annual 19-20 Action Plan CV-2 Amendment, which included CDBG – CV2 and ESG – CV2 funding, was posted on the Department’s website, along with a notice identifying the availability of the amendment. The Notice included the opportunity to provide electronic comment for the required period of not less than five days between July 30, 2020 – August 4, 2020. Subsequently, due to weather, the Department of Housing conducted a Virtual Public Hearing on Thursday, August 27, 2020 which began at 11:00 AM and ended when all attendees had an opportunity to comment. This Virtual Public Hearing conducted to replace the cancelled hearing on August 4, 2020, and was released to the public on August 21, 2020. As part of the Notice, the state included information on how citizens who have special needs may obtain the Amendment in a form which is accessible to them.

The Public Notice was originally published in four (4) newspapers of general circulation, and included at least one (1) minority publication.

Copies of both Public Notices were emailed to all interested parties who had registered with the Department as part of its “Community Partners” list, as well as the governmental leaders of all 169 towns/cities in the State, and the seven (7) councils of government.

Comments received, either at the virtual public hearing or during the public comment period were considered by the agency before the final CV-2 Amended Action Plan was submitted to HUD. All comments received have been summarized and responded to in Attachment A.

DOH provided the Draft 19-20 Annual Action Plan CV-2 Amendment and public hearing/public commentary schedule to members of the state legislature who sit on committees of cognizance over matters related to housing, and state finances.

In addition, consultation was sought from CT Balance of State (BOS) Continuum of Care (CoC) Steering Committee. DOH shared the proposal for the Amended Emergency Solutions Grants Program. Members were notified of the virtual public hearing to be held for the development of the CV-2 Amended Action Plan, and encouraged to attend.

Outline of Activity for Public Hearings/Public Comment:

Please see Attachment A-3 Summary of Public Comments Received and DOH Responses.

A-3 Summary of Public Comments Received and DOH Responses

General Edits: A number of general edits not materially affecting the policies, priorities or allocations within the document were received.

Response: All relevant edits were made accordingly, including adjustments of awarded and anticipated funding.

General Policy Statements: A number of general policy statements supporting the policies and priorities identified in the Action Plan were provided by a number of commenters.

Response: The Department appreciates the support for its policies and priorities as drafted and is committed to an inclusive and participatory process in the implementation of its programs and the expenditure of its funding.

Summary of Specific Comments from Public Hearing:

Several comments were received recommending that eligible uses of CDBG funds to include shelter diversion and homelessness prevention which would allow for reinforcement of planned use for ESG CV2 funds, along with coordinating local service agencies, including the CAN's.

Response: The Department appreciates the recommendations relative to supporting all eligible uses for CDBG CV2 funds addressing homelessness due to COVID-19 and will make as much funding as possible available. ESG-CV2 and HOPWA-CV2 funds are eligible to go directly to the CANs, while CDBG-CV2 funds will allow CAN participation through a unit of general local government.

Several comments were received supporting priority for Rapid Rehousing, Shelter Diversion, and planned investment for emergency shelter and homeless outreach activities under the ESG-CV2.

Response: The Department believes that significant commitment must be made to address those families who are already experiencing homelessness, and sees these tools as a primary means for addressing this issue. We appreciate support for this initiative.

Several comments were received encouraging the Department to leverage existing homeless outreach efforts supported by DMHAS PATH, which is restricted by funding source to serving people who identify as living with a serious mental illness.

Response: The Department supports leveraging funding to support homelessness prevention for people who identify as living with a serious mental illness.

Several comments were received encouraging the Department to identify other resources than ESG CV2 to fund needed eviction prevention activities, thereby leaving ESG CV2 funding for programs that serve currently homeless or homelessness prevention.

Response: The Department appreciates this recommendation and is still in the process of fleshing out the details of the Eviction Prevention Program with the goal of putting the State in a better position to receive additional CARES ACT funding to address this problem.

Several comments were received recommending the Department do the following homelessness prevention activities with its ESG CV2 funding:

1. Ensure other available resources are adequate for shelter diversion, rapid rehousing, outreach, and shelter related costs;
2. Increase investments in Coordinated Access and Shelter Diversion;
3. Require Coordinated Access Networks to broaden criteria to include serially doubled up households, institutional discharges of persons with previous homeless history, or other cohorts most likely to fall into homelessness without intervention.

Response: The Department appreciates the recommendation to ensure adequate funding for shelter diversion, rapid rehousing, outreach, and shelter related costs. The Department believes that significant commitment must be made to address homelessness prevention, and sees these programs as primary tools for addressing this problem. We appreciate support for this initiative. In regard to assisting specific population groups, the department will look for opportunities with our regular ESG and other funding. Relative to these funds, we are obligated to use the CARES Act funding solely to prepare, to respond to or to prevent the spread of COVID-19.

Several comments were made recommending the Department make a highly targeted, strategic use of ESG CV2 dollars to prevent and end homelessness for as many CT residents as possible.

Response: The Department believes that significant commitment must be made to address homelessness prevention and support those families and individuals who are already experiencing homelessness, and sees rapid rehousing as the primary tool to address this issue. We appreciate support for this initiative.

A comment was received in support of a statewide rent stabilization program to assist renter households who have fallen behind on rent due to the pandemic. It was encouraged that DOH utilize additional CARES Act resources as well as other funding sources for rent relief if allowable, including CDBG, HOME and /or other state resources.

Response: The Department appreciates the support for a rent stabilization proposal and is looking forward to developing an eviction prevention program which will address similar issues, in an effort to assist as many people as possible who are threatened with eviction due to COVID-19.

A comment was received supporting proposed allocations for ESG CV2 funded activities and it was noted that they are aligned with PSC's Reaching HOME Campaign.

Response: The Department believes that significant commitment must be made to address homelessness prevention and those families who are already experiencing homelessness. We appreciate support for these initiatives.

A comment was received supporting utilizing ESG CV2 funding for Rapid Rehousing and case management.

Response: The Department appreciates support for these initiatives, and recognizes that case management, particularly associated with exits and rapid exits, are a critical component of success. Case management at all levels are supported by these, as well as the Rapid Rehousing allocation.

Several comments were received supporting the utilization of ESG CV2 funding for eviction and homelessness diversion/prevention that targets assistance to individuals and families that are most at risk of literal homelessness.

Response: The Department appreciates support for these initiatives, and recognizes how important they are in addressing homelessness prevention and literal homelessness.

A comment was received encouraging the Department to create a strategy that incorporates coordinated outreach and street medicine during the crisis, including avoiding the clearing of encampments, encouragement of increasing space between individuals, and access to hygiene facilities and sanitation supplies.

Response: The Department appreciates the recommendation for developing a strategy that incorporates coordinated outreach/street medicine and will explore how to most effectively bring the best health care opportunities to the homeless and/or at risk of being homeless populations in our state.

A comment was received recommending increased administrative capacity/funding for the CANs to accommodate additional work COVID-19 funds will place on them.

Response: The Department appreciates the recommendation for increased administrative capacity/funding for the CANs and, in addition to providing ESG funding throughout this network, is also encouraging municipalities to coordinate their SC CDBG requests with their local nonprofit service providers.

A comment was received recommending that the Department prioritize the support of organizations working directly with the homeless who have been challenged with added costs including costs for food and cleaning supplies.

Response: The Department appreciates the recommendation to ensure adequate funding for shelters and shelter related costs. We appreciate support for this initiative.

Attachment B – Citizen Participation Documents

- Attachment B-1(a) and B-1(b) Legal Notice(s) for Virtual Public Hearing and Public Comment Period for the development of 2019-2020 Annual Action Plan CV2 Amendment
- Attachment B-2 Virtual Public Hearing Recording
- Attachment B-3 Written Comments

Attachment B-1(a)

NOTICE OF VIRTUAL PUBLIC MEETING AND COMMENT PERIOD

The State of Connecticut Department of Housing
Draft FY 19-20 Annual Action Plan Second Amendment – CV2 Funding
for
Housing and Community Development
CARES Act Funding

A five (5) day public-examination and comment period will begin on Thursday, July 30, 2020 and end on August 4, 2020. The Department of Housing is seeking public comment and input on the Draft 2019-2020 Action Plan Second Amendment – CV2 Funding for Housing and Community Development CARES Act Funding, specifically to address the receipt of funding to address needs resulting from the COVID-19 pandemic under the federal CARES Act. These funds currently include funding for Small Cities/Community Development Block Grant (SC-CDBG-CV) program in the amount of \$11,467,321, and Emergency Solutions Grants (ESG-CV) in the amount of \$12,591,306. These funds will be used to prevent, prepare and respond to the coronavirus, and will be administered in accordance with the respective programmatic requirements, including the need to meet a national objective, where applicable.

The Department of Housing will conduct a VIRTUAL PUBLIC HEARING on August 4, 2020 beginning at 3:00 PM and ending when all attendees have had an opportunity to comment. Please be aware that this virtual public hearing will be recorded, and posted on the Department's website after its completion. If you or your organization is interested in participating in the VIRTUAL PUBLIC HEARING, please send an e-mail to CT.HOUSING.PLANS@ct.gov with "Virtual Public Hearing – Second Amendment to FY 19-20 Annual Action Plan" in the "Subject" line. An E-mail links will be sent to all registered participants using the Microsoft TEAMS application.

DOH will also accept electronic comment on the administration of these programs through August 4, 2020 at CT.HOUSING.PLANS@ct.gov. All comments received will be summarized with responses in the final version of the Amendment. For copies of the Draft Amendment to FY 19-20 Annual Action Plan and related documents, please refer to the Department of Housing's website, <http://www.ct.gov/doh> under POLICY & RESEARCH.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to Heidi Gray, HR Specialist, Department of Administrative Services - Small Agency Resource Team 860-713-5028/860-270-8022.

Publication Date: July 30, 2020

Attachment B-1(b)

NOTICE OF VIRTUAL PUBLIC MEETING

The State of Connecticut Department of Housing
Draft FY 19-20 Annual Action Plan Second Amendment – CV2 Funding
for
Housing and Community Development
CARES Act Funding

The Department of Housing is hosting a VIRTUAL PUBLIC HEARING on August 27, 2020 beginning at 11:00 AM to seek public comment and input on the Draft 2019-2020 Action Plan Second Amendment – CV2 Funding for Housing and Community Development CARES Act Funding, specifically to address the receipt of funding to address needs resulting from the COVID-19 pandemic under the federal CARES Act. These funds currently include funding for Small Cities/Community Development Block Grant (SC-CDBG-CV) program in the amount of \$11,467,321, and Emergency Solutions Grants (ESG-CV) in the amount of \$12,591,306. These funds will be used to prevent, prepare and respond to the coronavirus, and will be administered in accordance with the respective programmatic requirements, including the need to meet a national objective, where applicable.

The Department of Housing will conduct a VIRTUAL PUBLIC HEARING on **Thursday, August 27, 2020 beginning at 11:00 AM** and ending when all attendees have had an opportunity to comment. This VIRTUAL PUBLIC HEARING is to replace the cancelled hearing on August 4, 2020. Please be aware that this virtual public hearing will be recorded, and posted on the Department's website after its completion. If you or your organization is interested in participating in the VIRTUAL PUBLIC HEARING, please send an e-mail to CT.HOUSING.PLANS@ct.gov with "*Virtual Public Hearing 2 – Second Amendment to FY 19-20 Annual Action Plan*" in the "Subject" line. An E-mail links will be sent to all registered participants using the Microsoft TEAMS application.

For copies of the Draft Amendment to FY 19-20 Annual Action Plan and related documents, please refer to the Department of Housing's website, <http://www.ct.gov/doh> under POLICY & RESEARCH.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to Heidi Gray, HR Specialist, Department of Administrative Services - Small Agency Resource Team 860-713-5028/860-270-8022.

Release date: August 21, 2020

B-2 Virtual Public Hearing Recording

[Virtual Public Hearing 19-20 Annual Action Plan CV2 Amendment](#)

B-3 Written Comments

From: athy Hunter <kathy@shworks.org>
Sent: ednesday, April 29, 2020 5:31 PM
To: T Housing Plans
Cc: avid Rich; Pamela Ralston; elained@westportct.gov; Stefenson, Susan
Subject: ublic Comment for 2019-2020 Action

To the Connecticut Department of Housing:

In terms of potential Second Tier priorities, should insufficient applications fulfill the First-Tier priorities, Supportive Housing Works would like to propose that SC CDBG – CARES funding be used to increase staffing for the current Coordinated Access Network infrastructure for Diversion under the Public Services Activity. Particularly in Fairfield County, we anticipate a measurable increase in services for shelter diversion due to the economic recession. The Fairfield County Diversion program has demonstrated considerable impact in the first program year (Town of Westport) increasing individual diversion rates from 8% to 39% and family diversion rates from 25% to 78%. Adverting the shelter system decreases the number of households becoming homeless, the demand for shelter beds, and the size of program wait lists. Shelter diversion can save funds that are otherwise lost due to the impact of homelessness.

Sincerely,

Kathy Hunter

Kathy Hunter (She, Her, Hers)
Deputy Director
Supportive Housing Works
(203) 215-8559

From: Cathy Zall <czall@snet.net>
Sent: Tuesday, April 28, 2020 1:47 PM
To: CT Housing Plans
Subject: State Plan

Hi,

I would like to add a comment.

As expressed so well by others, I would like to encourage the consideration of added funding for the CAN system. Increasing coordination within the homeless response system will magnify the effectiveness of resources invested in ending homelessness.

Thank you.

Cathy Zall
Executive Director
New London Homeless Hospitality Center

From: heila Dravis <sdravis@Milfordct.gov>
Sent: ednesday, April 29, 2020 4:15 PM
To: T Housing Plans
Subject: ublic Comment – Amendment to FY 19-20 Annual Action Plan”

Good Afternoon -

Please accept this public comment on the allocation of CDBG-CV through the Small Cities CDBG Program. Please consider the following allocation suggestions :

Municipal Health Departments funding to purchase testing for the broad public.

Municipal Health Departments use vacant buildings to set up "rooms" for COVID-19 patients to be treated or quarantine.

Child care for first responders and small businesses

Small business (and Micro-enterprise) grants to those that applied but did not receive or were denied loans for SBA paycheck protection program

Thank you, Sheila Dravis
CDBG Administrator
Economic & Community Development
203-783-3230
sdravis@milfordct.gov

Submitted via e-mail to CT.HOUSING.PLAN@ct.gov

Connecticut Department of Housing
505 Hudson St.
Hartford, CT 06106

Re: Public Comment on the DRAFT State of Connecticut 2019-2020 Action Plan AMENDMENT for Housing and Community Development

To our colleagues at the Department of Housing:

The Connecticut Coalition to End Homelessness (CCEH) is respectfully submitting public comment in response to the CT Department of Housing's (DOH) draft amendment to its 2015-2020 Consolidated Plan and 2019-2020 Annual Action Plan on the allocation of Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds to non-entitlement jurisdictions through the CARES Act. CCEH is a nonprofit organization representing more than 100 members including emergency shelter providers, transitional housing providers, community and business leaders, and strategic partners, all of whom share the goal of ending homelessness in Connecticut. In partnership with communities throughout the state, CCEH advances this goal through leadership, community organizing, advocacy, research, and education. This letter identifies the ways in which funding from the CARES Act can be most effectively used to address the needs of people experiencing homelessness.

CCEH is working closely with state agencies, Coordinated Access Networks, and shelters to reduce the impact of COVID-19 on people experiencing homelessness, the providers who serve them, and the general public. Through the state-wide shelter decompression effort, more than 900 households in the homeless population have moved into hotels and non-congregate settings, with nearly 1,000 households still remaining in shelter. CCEH's data shows that 2,009 people were staying in shelters at the start of March. Our data shows that 134 of these clients were over the age of 62 and therefore especially vulnerable to the virus. This figure also included 183 families with 346 children, and an additional 48 unaccompanied youth. These clients represent some of our state's most vulnerable people and we are now working with state partners and providers to aggressively house all of the aforementioned as well as additional clients experiencing homelessness to avoid returning them to congregate shelter settings or the streets.

CCEH is proud to partner with the CT Department of Housing and applauds the strides the department has taken to mitigate the impact of COVID-19 on those experiencing homelessness. Upon review of the CT Department of Housing's (DOH) draft amendments to its 2015-2020 Consolidated Plan and 2019-2020 Annual Action Plan, we appreciate that additional funding through the CARES Act for CDBG and ESG is being prioritized for people experiencing

homelessness. And while we are in support of the intent and aim of the amended plan, we have three key recommendations for how to ensure that our providers have the resources they need to quickly return clients to safe housing.

- 1) **CDBG Funding:** We need to have the resources on hand to divert people from shelter and return those experiencing housing crisis quickly to housing. The \$8,138,549 funding from the CARES Act for Small Cities/Community Development Block Grant Funds should be used to prevent homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to housing. CCEH encourages the Department of Housing to give strongest consideration to applicants who propose the use of these funds for shelter diversion.
- 2) **ESG Rapid Re-Housing Funding:** CCEH supports the Department of Housing prioritizing \$4,000,000 of the \$8,159,579 from the CARES Act for rapid re-housing funding. This investment will allow providers to ramp up navigation services, landlord identification, and rental assistance. While we understand this is the first of three installments of CARES Act funding, we strongly encourage the state to consider increasing the amount of funding in this area in the near term, as we are very concerned that the individuals currently in hotels will be forced back into shelter and the street when the funding for hoteling subsides. CCEH supports maximizing the impact of CARES Act funding by using it to fund emergency services that create a pathway to long-term stability for this population. CCEH also encourages the Department of Housing to prioritize housing navigation funding for rapid re-housing clients, if navigation is not funded by the Department of Social Services or any other state or federal funding source.
- 3) **ESG Expansion of Shelter Funding:** CCEH also supports the Department in the plan to allocate \$1,250,000 of the ESG funding to the expansion of shelter funding, including operation and activities. Through our conversations providers the need for staffing at shelters for navigation services and case management is clear. CCEH would ask the Department to consider setting aside a significant part of these funds for shelter case management for housing navigation for rapid exit and rapid re-housing.

Thanks in advance for your consideration of our feedback on the CT Department of Housing's (DOH) draft amendment to its 2015-2020 Consolidated Plan and 2019-2020 Annual Action Plan.

Sincerely,

Richard Cho
Chief Executive Officer
CT Coalition to End Homelessness



April 29, 2020

Commissioner Seila Mosquera-Bruno
Connecticut Department of Housing
505 Hudson Street
Hartford, CT 06105

Re: Comments on the Draft State of Connecticut 2019- 2020 Action Plan Amendment
For Housing and Community Development

Dear Commissioner Mosquera-Bruno:

The Connecticut Fair Housing Center, Greater Hartford Legal Aid, New Haven Legal Assistance, Connecticut Legal Services, Connecticut Veterans Legal Center, and Connecticut Legal Rights Project (the signers) submit these comments on the DRAFT State of Connecticut 2019 – 2020 Action Plan Amendment for Housing and Community Development (Action Plan Amendment). We applaud the actions taken by the State of Connecticut and the Department of Housing (DOH) in response to the unique challenges posed by the COVID-19 virus and the resulting economic shutdown. DOH's actions have prevented the spread of the virus among people who are homeless and ensured that this vulnerable population has appropriate services.

However, tenants in Connecticut, and particularly tenants of color, face a bigger crisis in June when the courts open and in July when landlords are able to file summary process actions (evictions) for nonpayment of rent. When tenants cannot pay their rent, landlords cannot pay their mortgages, maintain the housing, or pay their property taxes. These severe economic consequences impact tenants, landlords, and municipalities alike. The most effective way to break this downward cycle of economic and social impacts is to use CARES Act funding for eviction prevention. By paying delinquent rent before summary process actions are filed, tenants will be able to stay in their homes and there will be a reduced need for homelessness services.

Obligation to Affirmatively Further Fair Housing

The passage of the federal Fair Housing Act in 1968 obligates recipients of federal financial support from the U.S. Department of Housing and Urban Development (HUD) to affirmatively further fair housing (AFFH). *See* 42 U.S.C. § 3608(d). As set out in 24 CFR § 5.152, affirmatively furthering fair housing means:

. . . taking meaningful actions that, taken together, *address significant disparities in housing needs* and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining

compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development. (emphasis added).

When the Coronavirus Aid, Relief and Economic Security Act (CARES Act) became law on March 27, 2020, the obligation to AFFH came with the money passed through HUD. Therefore, any money given to DOH through the CARES Act must be spent in a way that addresses significant disparities in housing needs as well as transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

Decades of discriminatory housing practices, that build and maintain segregated neighborhoods, mean people of color in Connecticut continue to be hardest hit by the COVID-19 crisis. In Connecticut, people of color have lower homeownership rates resulting in greater numbers living in multifamily units. According to [CT Data Collaborative](#), 60.5% of African-American families and 65.8% of Latino families rent their homes compared to just 23.9% of White families. These multifamily units typically have more shared living spaces like laundries, elevators, and hallways, contributing to higher rates of the spread of the virus. In addition, many people of color are essential workers and are continuing to interact with the public while working in healthcare, grocery stores, transportation services, and delivery services. Because of the types of jobs they are disproportionately likely to have and existing disparities in the healthcare system, many people of color lack employer-provided healthcare or other health insurance, contributing to a lack of treatment for COVID-19 risk factors like obesity and coronary artery disease. Finally, fewer people of color have access to COVID-19 testing than whites. For information on the effects of the COVID-19 crisis on communities of color, click [here](#), [here](#), [here](#), and [here](#).

When the courts open again in June, people of color will disproportionately fill the dockets on days when summary process actions are heard and will disproportionately face the loss of their homes due to nonpayment of rent. As a result, it is imperative that the money spent under the CARES Act keep people in their homes and not jammed into courtrooms or displaced to homeless shelters. While homeless prevention and an expansion of the Rapid Rehousing Program will also assist people of color, these services do not address the needs of the majority of people affected by the COVID-19 economic shut down. Since the start of the crisis, the Coordinated Access Networks have worked to assist people who are chronically homeless and/or have a high risk of infection. The focus has been on getting this vulnerable population into placements that prevent the spread of the virus and provide shelter for people who are already infected. During this next phase, the emphasis needs to be on keeping people in their homes.

Need for Additional Funding

Currently, the State's proposed CARES Act expenditures include just \$2,809,579 for an Eviction Prevention Program. Given that 220,000 Connecticut residents have already applied for unemployment, the amount set aside for eviction prevention is inadequate. Between March 11, when Governor Lamont declared a state of emergency, and April 10 when he issued an Executive Order preventing landlords from filing any additional eviction actions until July 1, more than 800 summary process cases were filed with the Connecticut courts. After the Governor's April 10 Executive Order 7X was issued, another 28 summary process actions were

filed. It is clear from these filings that without immediate action, the State's shelters will need to expand exponentially to handle the influx of families who will become homeless due to nonpayment of rent.

For context, the City of Boston recently announced a plan to spend \$3 million to assist renters in a city that is one-fifth the size of Connecticut. In Washington State, United Way of King County, in partnership with King County, the City of Seattle, and the Seattle Foundation, announced the launch of a \$5 million investment in an expanded program to provide rental assistance to King County households that have lost all or part of their income due to the coronavirus pandemic. It is estimated these funds will help up to 2,000 families stay in their homes. The city of Dallas, a little more than a third of the size of Connecticut, just approved a total of \$13.7 million in relief to help pay rent, mortgages, and utilities for residents who are unemployed or furloughed because of the coronavirus. Eligible households could get up to \$1,500 for a maximum of three months. Finally, Governor Abbott of Texas recently decided to use HOME Trust Fund moneys for rental assistance in an effort to prevent tenants who cannot pay their rent from becoming homeless.

Rental Market Stabilization Fund Proposal

The signers urge that the allocation of the CARES Act funding, as laid out in the Action Plan Amendment, be modified, since it will not affirmatively further fair housing and will increase the disparities in access to housing. Instead, we ask that DOH create the Rental Market Stabilization Fund (Stabilization Fund). The Stabilization Fund will provide rental assistance to residential landlords who have lost rental income due to the economic impact of COVID-19. Landlords will be required to apply to the Stabilization Fund, on behalf of and with the cooperation of their tenants, to seek compensation for lost rental income prior to the termination of a residential lease or initiation of an eviction. Eligible tenants may also apply. Stabilization Fund assistance will be applied to residential tenants' outstanding rental account balances, provided that the household has paid, or agreed to pay, at least 30% of their household income as rent for each affected month. Landlords who receive assistance from the Stabilization Fund must forgive a portion of the unpaid rent, remove late fees, interest, penalties, and similar charges from tenants' rental account balances, and agree to maintain the assisted tenancy, without any rent increase, for a period of twelve months. Other states, including New Jersey and California, are discussing similar programs.

To address significant disparities in access to housing and to keep families housed, the signers recommend that the \$2.8 million currently allocated for eviction prevention be used to create the Stabilization Fund program, choose a fund administrator, conduct a needs assessment, and roll out assistance to the neediest tenants who have lost income due to unemployment. In addition, the signers recommend four additional sources of funding for this program. First, DOH should include funding of eviction prevention in the allocation of the \$4 million available from the ESG Rapid Rehousing Program to reduce eviction related need for Rapid Rehousing services. Rapid Rehousing and shelter beds cost the state more on a per household basis than the Stabilization Fund assistance would. Second, DOH should distribute \$7,894,393 from the Small Cities CDBG – CARES funding only to communities who agree to use their allocations for the Stabilization Fund for landlords and tenants living in their communities. In the past, DOH has

had difficulty getting small cities participants to use CDBG funds for people of color living in their communities. By requiring the municipalities to use the funds for the Stabilization Fund, it is likely that people of color will also benefit. See, HUD guidance on use of CDBG-CARES funding. Third, DOH should explore whether there is CARES Act money in the HOME Investment Partnership Program that can be used for the Stabilization Fund. Finally, DOH should convene a meeting with entitlement communities to determine if they will also use their CARES Act funds to assist tenants and landlords in their communities through the Stabilization Fund, thus making it state-wide. By setting aside an appropriate amount of funding for eviction prevention as well as working to make this program state-wide, Connecticut will avoid overflowing shelters and the loss of housing for large numbers of families while addressing the disparity in access to housing resources.

Thank you for your work on this issue. We are happy to discuss any of the issues raised in this letter.

Very truly yours,



Erin Kemple
Connecticut Fair Housing Center
Executive Director

Kathy Flaherty, Executive Director Connecticut Legal Rights Project
Liam Brennan, Executive Director Connecticut Veterans Legal Center
Shelley White, Litigation Director New Haven Legal Assistance Association
Nilda R. Havrilla, Litigation and Advocacy Director Connecticut Legal Services, Inc.
Giovanna Shay, Litigation and Advocacy Director Greater Hartford Legal Aid



April 29, 2020

Commissioner Seila Mosquera-Bruno
Connecticut Department of Housing
505 Hudson Street
Hartford, CT 06105

Re: Comments on the Draft State of Connecticut 2019- 2020 Action Plan Amendment
For Housing and Community Development

Dear Commissioner Mosquera-Bruno:

Partnership for Strong Communities submits the following comments on the draft State of Connecticut 2019 – 2020 Action Plan Amendment for Housing and Community Development. We want to thank you and the staff of DOH for your dedicated work during this unprecedented health and economic crisis.

As noted in the letter our HomeConnecticut Advisory Committee submitted to the Governor and other administration officials, we believe strongly that a statewide rent stabilization fund will be needed to assist renter households who have fallen behind on rent due to the pandemic and prevent homelessness. While the federal CARES Act will provide additional relief to unemployed workers, stimulus checks and an increase in unemployment insurance benefits are likely to take weeks to arrive, and will not alleviate the immediate loss in income experienced by at least 15% of Connecticut residents since the beginning of the COVID-19 public health care crisis. Half of all renter households earn less than \$40,000 annually. At these wage levels families cannot withstand a period of unemployment and still make rent. Even before the COVID-19 crisis, nearly 120,000 renter households in Connecticut were spending at least half of their income on housing. The Partnership for Strong Communities and Connecticut Fair Housing Center estimate about 232,000 families will need cash assistance to reduce rental arrearages and prevent evictions. Families of color will likely be disproportionately affected by this crisis, as they already are by unemployment, housing discrimination and eviction. Resources should be targeted to those most affected and communities of color.

We support the rental stabilization fund proposal set forth by our partners at the Connecticut Fair Housing Center that would allow landlords or tenants to be applicants. Such a fund, of ideally \$400 million, could provide relief to renters prior to the start of eviction proceedings and stabilize landlords' operating budgets and the private rental market. Such a fund should come with some rental forgiveness on the part of landlords as well as commitment to forgo late fines and rental increases for 12 months. We recognize that a rental assistance fund of this size will require resources beyond those available through state funding. We are hopeful that additional funding of this nature as requested by the National Low Income Housing Coalition and many in Connecticut's congressional delegation will arrive. There are, however, examples of COVID-19 renter relief funds being established already in larger cities and some states across the U.S. We have been tracking the creation of these funds nationally and would be happy to share our data with you. We believe the best solution for Connecticut is a statewide fund.

CDBG

CDBG and other federal emergency funds, can, in the meantime be used for rental relief and we recommend prioritizing those for this purpose. CDBG funds that DOH does control may be put towards such a state fund. Furthermore, we strongly encourage DOH to prioritize and fund those municipal Small Cities CDBG applications that propose to use those funds for rent relief purposes, ideally in a coordinated way with the state-managed rent stabilization fund as well as for identifying alternative housing arrangements for those seeking shelter. Additionally, while we hope to see funding from a forthcoming federal stimulus package specifically for rent relief, we strongly encourage DOH to look at the possibility of using other new emergency funding resources for rent relief if allowable, this includes programs like HOME or other state resources.

Emergency Solutions Grant

Rapid Rehousing

We strongly support the expenditure of \$4,000,000 of ESG funds for Rapid Rehousing as DOH has proposed. In order to both stem the tide of this pandemic and reduce the potential for overflow in shelters that have decompressed to accommodate social distancing protocol, the state must prioritize permanently housing as many current shelter clients as possible. With the possibility of more households entering our cash-strapped homeless service system in the coming months due to economic crisis, we risk seeing a quick and sizable increase in the number of unsheltered individuals and families if we do not work to quickly house those already in shelters and hotels.

Eviction Prevention

Finally, we ask that ESG funds directed toward eviction prevention prioritize assistance to individuals and families that are most at risk of homelessness. Our Reaching Home Prevention Workgroup, made up of state agency and nonprofit partners has worked to put some recommendations in place regarding how to identify those at risk and structure such a pool of funds, as well as using existing resources, to make this process most efficient and effective. The combination of intensive social, legal, and financial services is critical for the prevention of homelessness with real and sustainable outcomes.

Sincerely,



Kiley Gosselin
Executive Director