



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
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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	-

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	
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 - Amendment	
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.

Table 1: Summary of Activities for First Distribution of ESG-CV

ESG-CV2 Funded Activity	Allocation to be Awarded
Expansion of Rapid Rehousing	\$ 3,591,306
Case Management to Support Rapid Rehousing	\$ 1,000,000
Eviction Prevention	\$ 2,500,000
Expansion of Shelter Funding – Operations and Activities	\$ 2,000,000
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
DOH Administrative Costs (Eligible for up to 10%)	\$ -0-
Total Funds in Second Distribution	\$ 12,591,306

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.

DRAFT

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