

State of Connecticut Recovery Housing Program (RHP)

Action Plan – Federal Fiscal Year 2020 and Federal Fiscal Year 2021



Submitted to the

U.S. Department of Housing and Urban Development

by the State of Connecticut

August 5, 2021

State of Connecticut Recovery Housing Program Action Plan for FFY 2020 and FFY 2021

TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY		2	
	A.	Overview		
	В.	State Direct Administration		
	C.	Objectives and Outcomes		
	D.	Citizen Participation	5	
II. III.	INTRODUCTIONCITIZEN PARTICIPATION			
	A.	Cross-Sector Partnerships		
IV.	FED	DERAL REQUIREMENTS		
	A.	Resources	9	
	В.	Method of Distribution	9	
	C.	National Objective and Eligible Activities	10	
	D.	Waivers and Alternative Requirements	11	
	E.	Geographic Distribution	12	
٧.	PROGRAM ACTIVITIES			
	A.	Recovery Housing Program (RHP)	12	
	10.	Monitoring for Recovery Housing Program Funds	18	
VI ATTACHMENTS TO THE RHP ACTION PLAN				
		achment A – Amended Citizen Participation Process		
	Atta	achment B – Citizen Participation Documents	19	

I. EXECUTIVE SUMMARY

A. Overview

This State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21 is submitted to the U.S. Department of Housing and Urban Development (HUD) in order to be eligible to receive funding under the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act), which was passed in 2018. RHP rules fall under the umbrella of the Community Development Block Grant (CDBG) Program, as modified for RHP by Federal Register Notice (FR-6225-N-01) (the Notice).

The intent of the pilot Recovery Housing Program (RHP) is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. RHP funds may be used to develop or maintain housing for individuals in recovery from SUD. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

As mandated by the SUPPORT Act, The State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Cares, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

The CT BOS CoC and ODFC are united coalitions of community and state systems that assist homeless and near homeless residents in Connecticut region to obtain housing, economic stability, and an enhanced quality of life through a coordinated community-based process of identifying and addressing needs. Avoiding duplication of efforts, leveraging resources and coordinated planning are other purposes of the CT BOS and ODFC.

The following table details the funding allocated to the State of Connecticut under the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act).

Recovery Housing Program funds for the State of Connecticut				
Allocation Year	Recovery Housing Program Funds			
Federal Fiscal Year 2020	\$944,000			
Federal Fiscal Year 2021	\$944,199			

B. State Direct Administration

The State of Connecticut will use its RHP funds to act directly, subject to state law and RHP requirements, to carry out activities through employees, contractors, and subrecipients in all geographic areas within its jurisdiction, including entitlement areas and tribal areas. The state will focus RHP funds towards projects that complement federal substance abuse-related assistance, and will be responsible for submitting the Request for Release of funds to HUD for approval.

The State of Connecticut will carry out activities through subrecipients and will comply with 24 CFR 570.489(m) relating to monitoring and management of subrecipients. The definition of subrecipient at 24 CFR 570.500(c) applies when utilizing subrecipients, and the requirements of 24 CFR 570.489(g) (as modified by section II.D.vii) shall apply. For purposes of this alternative requirement, the definition of subrecipients at CFR 570.500(c) is modified to expressly include Indian tribes. Indian tribes that receive RHP funding from the State of Connecticut must comply with the Indian Civil Rights Act (Title II of the Civil Rights Act of 1968, 25 U.S.C. 1301 et seq).

For activities carried out by the State of Connecticut in entitlement areas, the provisions of 24 CFR 570.486(c) are waived to the extent necessary to allow the state, either directly or through units of general local government, to use RHP funds for activities located in entitlement areas without contribution from the entitlement jurisdiction.

At its discretion, the State of Connecticut may carry out activities utilizing the state CDBG program regulations to distribute RHP funds to units of general local government, Indian tribes, tribally-designated housing entities, and entitlement areas.

C. Objectives and Outcomes

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery forma substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- · Clearance and demolition;
- Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI persons.

Lease, rent, and utilities costs may be paid for an eligible individual for up to 2 years. There is not limit on the portion of the grant that may be used for such costs. Payments must result in a new service or quantifiable increase in an existing service.

The state use of RHP funds is not required to be consistent with the consolidated plan and HUD is not required to annually review RHP program performance for consistency with the consolidated plan. The RHP Action Plan will be submitted separately from the consolidated

plan, and the RHP program don't not need to be referenced in the consolidated plan submitted in IDIS. The state will prepare a single Action Plan once per RHP allocation, not annually. Updating the current consolidated plan's needs assessment, market analysis, and strategy is not required.

D. Citizen Participation

In accordance Connecticut's Amended Citizen Participation Plan, DOH solicited public participation in order to: 1) solicit input into the development of the draft Plan; and 2) solicit feedback and comments on the draft plan.

The DOH conducted several round table discussions with state officials, representatives of the Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC), as well as other housing/service organizations to seek input into the development of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21.

A fifteen (15) day community input period began on Thursday, July 15, 2021 and ended on Friday, July 30, 2021. The Department conducted a virtual public meeting on Thursday, July 29, 2021 which began at 10:05 AM and end after all attendees had the opportunity to provide input and comment. A legal notice for the public meeting was published in four newspapers across the state including one in Spanish. The legal notice was also posted on DOH's web site and forwarded to all 169 municipal chief elected officials and the councils of government. In addition, the legal notice was sent via email to our Community Partners list, for further distribution, in accordance with DOH's Amended Citizen Participation Plan.

Details of the variety of Citizen Participation efforts are available in the Citizen Participation section of this Plan.

II. INTRODUCTION

The State of Connecticut's RHP funds will be utilized to support individuals in recovery onto a path to self-sufficiency. By providing stable housing to support recovery, the state's RHP funds will support efforts for independent living and will be used to develop or maintain housing for individuals in recovery from substance abuse disorder. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

To maximize and leverage resources, the state will coordinate RHP-funded projects with the state's two Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and will also coordinate RHP-funded projects with the Court Support Services Division of the State of Connecticut Judicial Branch.

The activities and resources discussed in this Action Plan will be administered by the Department of Housing (DOH).

The Action Plan includes the following sections in accordance with federal regulations:

- Resources: Funding sources available;
- State Direct Activity;
- Method for distributing funds for activities;
- Geographic Distribution: Geographic areas to which the state will direct assistance;
- Administration Costs:
- Program Income;
- Monitoring;
- Procurement Process;
- Priority Needs;
- National Objectives;
- Eligible Activities;
- Overall Benefit;
- Waivers and Alternative Requirements
- Summary of Public Comments: Comments made on the Action Plan and DOH responses;
- Applications for Assistance: HUD Form SF-424;

III. CITIZEN PARTICIPATION

In accordance Connecticut's Amended Citizen Participation Plan (See Attachment A), DOH solicited public input in order to: 1) solicit input into the development of the draft Plan; and 2) solicit feedback and comments on the draft plan.

The DOH conducted a series of round table discussions with state officials, representatives of the Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC), as well as other housing/service organizations to seek input into the development of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21. These sessions took place over a period of about 6 weeks, and occurred virtually.

An initial draft plan was created as a result of these discussions, and made available to all of the participants throughout that initial period. No additional comments were received as a result, and the Draft State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21 ("Draft RHP") was generated.

A formal fifteen (15) day community input period on the Draft State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21 began on Thursday, July 15, 2021 and ended on Friday, July 30, 2021. The Department conducted a virtual public meeting on Thursday, July 29, 2021 which began at 10:05 AM and end after all attendees had the opportunity to provide input and comment. A legal notice for the virtual public meeting was published in four newspapers across the state including one in Spanish. The legal notice was also posted on DOH's web site and forwarded to all 169 municipal chief elected officials and the councils of government. In addition, the legal notice was sent via email to our Community Partners list, for further distribution, in accordance with DOH's Amended Citizen Participation Plan.

Due to the prior input and dialogue, no formal comments were received. One participant attended the virtual public hearing, a copy of which is available for viewing here.

There are other ways in which DOH gathered information and input on what needs to consider in developing any and all of the Department's plans. For example, there are meetings of

approximately 70 state boards and commissions throughout the year that the DOH attends. Some of the more relevant commissions include the CT BOS/CoC Steering Committee; the Homeless Management Information System (HMIS) Steering Committee; CT Opening Doors Steering Committee; CT Opening Doors- Standards subcommittee; Performance Measurement Committee and the Interagency Committee for Supportive Housing and Homelessness, the Interagency Committee on Affordable Housing.

Written Comments: No written comments were received pursuant to the Draft RHP.

A. Cross-Sector Partnerships

The intent of RHP is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. Cross-sector partnerships help serve the diverse needs that those entering recovery housing are likely to have and enhance the impact of recovery housing.

Recovery housing is one component of the care continuum that promotes long-term recovery and addresses the needs of the whole person with a SUD. Housing First/Whole Person Care addresses various dimensions of an individual's life that require different treatment that may affect long-term recovery. Partnerships that bring additional resources to collectively address all dimensions are essential. The State of Connecticut intends to coordinate with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and will also coordinate with the Court Support Services Division of the State of Connecticut Judicial Branch.

IV. FEDERAL REQUIREMENTS

A. Resources

In accordance with Section 8071 of the SUPPORT for Patients and Communities Act, entitled Pilot Program to Help Individuals in Recovery From a Substance Use Disorder Become Stably Housed, herein referred to as the Recovery Housing Program (RHP), resources are being distributed in accordance with this State of Connecticut Recovery Housing Program Action Plan Federal Fiscal Year 2020 and Federal Fiscal Year 2021.

This Recovery Housing Program Action Plan provides a detailed plan for expending federal funds for FFY 2020 and FFY 2021:

Recovery Housing Program funds for the State of Connecticut				
Allocation Year	Recovery Housing Program Funds			
Federal Fiscal Year 2020	\$944,000			
Federal Fiscal Year 2021	\$944,199			

The State of Connecticut will comply with RHP expenditure requirements and deadlines, including to expend at least 30% of its RHP funds within one year from the date HUD signs the RHP grant agreement, to expend 100% of the RHP funds before the end of the period of performance on September 1, 2027, and to limit administrative costs to 5% of the RHP grant. All program activities will be carried out directly through employees, procured contracts, or under agreements with subrecipients. RHP funds will be used in accordance with all program requirements including 2 CFR Part 200. All costs charged to the RHP grant must be reasonable and necessary.

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

B. Method of Distribution

The state's methods of distributing funds and carrying out activities funded by HUD will be through a Notice of Funding Availability (NOFA) and a competitive application process. The state will distribute RHP funds with priority given to entities serving populations with the

greatest need and the ability to complete the eligible activity in a timely manner. RHP funds will be administered through the Department of Housing in collaboration with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and also in collaboration with the Court Support Services Division of the State of Connecticut Judicial Branch. To maximize and leverage these resources, the state will coordinate RHP-funded projects with other Federal and non-federal assistance related to substance abuse, homelessness and at-risk of homelessness, employment, and other wrap-around services.

C. National Objective and Eligible Activities

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery from a substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- Clearance and demolition:
- · Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI persons. 24CFR 570.208(a)(2) and 570.483(b)(2)(i)(B) expand Limited Clientele criteria to enable assistance for acquisition, rehabilitation, reconstruction, or new construction activities, when at least 51% of beneficiaries are LMI. Any cost or other

limitations on beneficiary participation may not be prohibitive for low-income persons. In addition, 24CFR 570.208(a)(2)(i)(A) or 570.483(b)(2)(ii)(A) expands eligible categories of Limited Clientele to include persons who meet the federal poverty limits or persons who are insured by Medicaid.

Lease, rent, and utilities costs may be paid for an eligible individual for up to 2 years. There is not limit on the portion of the grant that may be used for such costs. Payments must result in a new service or quantifiable increase in an existing service.

Grant administration will be capped at 5% of the allocation. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance. Administration matching funds are not required.

D. Waivers and Alternative Requirements

Section 8071 of the SUPPORT Act (Section 8071) requires funds appropriated or made available for the Recovery Housing Program be treated as community development block grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, unless otherwise provided in Section 8071 or modified by waivers and alternative requirements. The SUPPORT Act authorizes the Secretary to waive or specify alternative requirements to any provision of Title I of the HCD Act, except for requirements related to fair housing, nondiscrimination, labor standards, the environment, and requirements that activities benefit persons of low-and moderate-income. These waivers and alternative requirements are only applicable to the use of RHP funds and do not apply to CDBG funds used in conjunction with RHP funds or other sources of CDBG funds that are used for similar activities.

The State of Connecticut will follow all applicable waivers and alternative requirements to the CDBG program requirements at Title I of the Housing and Community Development Act (HCDA) and 24 CFR Part 570 that HUD has found are necessary to expedite or facilitate the use of RHP funds. Except as specified in the Notice, the statutory and regulatory provisions of the annual CDBG program apply.

E. Geographic Distribution

The State of Connecticut will use its RHP funds to act directly, subject to state law and RHP requirements, to carry out activities through employees, contractors, and subrecipients in all geographic areas within its jurisdiction, including entitlement areas and tribal areas. The State of Connecticut will prioritize the distribution of funds in the service are of the Opening Doors Fairfield County (ODFC) Continuum of Care, service availability through Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

V. PROGRAM ACTIVITIES

A. Recovery Housing Program (RHP)

Federal Register Notice (FR-6225-N-01) (the Notice) implements the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act), which was passed in 2018. The intent of RHP is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. RHP funds may be used to develop or maintain housing for individuals in recovery from SUD. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

Section 8071 of the SUPPORT Act (Section 8071) requires funds appropriated or made available for the Recovery Housing Program be treated as community development block grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, unless otherwise provided in Section 8071 or modified by waivers and alternative requirements. The SUPPORT Act authorizes the Secretary to waive or specify alternative requirements to any provision of Title I of the HCD Act, except for requirements related to fair housing, nondiscrimination, labor standards, the environment, and requirements that activities benefit persons of low-and moderate-income. These waivers and alternative requirements are only applicable to the use of RHP funds and do not apply to CDBG funds used in conjunction with RHP funds or other sources of CDBG funds that are used for similar activities.

The RHP 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 RHP funding.

1. FY 2020 and FY 2021 Resource Allocation Plan for RHP

This Recovery Housing Program Action Plan provides a detailed plan for expending federal funds for FFY 2020 and FFY 2021:

Recovery Housing Program funds for the State of Connecticut				
Allocation Year	Recovery Housing Program Funds			
Federal Fiscal Year 2020	\$944,000			
Federal Fiscal Year 2021	\$944,199			

The State of Connecticut will comply with RHP expenditure requirements and deadlines, including to expend at least 30% of its RHP funds within one year from the date HUD signs the RHP grant agreement, to expend 100% of the RHP funds before the end of the period of performance on September 1, 2027, and to limit administrative costs to 5% of the RHP grant. All program activities will be carried out directly through employees, procured contracts, or under agreements with subrecipients. RHP funds will be used in accordance with all program requirements including 2 CFR Part 200. All costs charged to the RHP grant must be reasonable and necessary.

The Federal Fiscal Year 2020 allocation to DOH for the RHP Program is anticipated to be \$944,000 and the Federal Fiscal Year 2021 allocation is anticipated to be \$944,199. RHP funds are subject to availability from the federal government. If changes to this distribution become necessary, procedures outlined below will be observed in making those changes. Grant administration for FFY 20 will be capped at 5% of the allocation, which is \$47,200. Grant administration for FFY 21 will be capped at 5% of the allocation, which is \$47,210. Administration matching funds are not required. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance.

The total funds available to fund projects out of FFY 20, is anticipated to be \$896,800 which is FFY 20 allocation of \$944,000 minus administrative costs of \$47,200. The total funds available to fund projects out of FFY 21, is anticipated to be \$896,989 which is FFY 21 allocation of \$944,199 minus administrative costs of \$47,210.

As mandated by the SUPPORT Act, the State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

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 as defined above.

Recovery Housing Program		
RHP Award FFY 20	FFY 20 Funding	
RHP Award	\$944,000	
Minus		
Administrative Authorization (5% of Award)	\$47,200	
Equals		
Total RHP Funding for Projects FFY 20	\$896,800	

Recovery Housing Program			
RHP Award FFY 21	FFY 21 Funding		
RHP Award	\$944,199		
Minus			
Administrative Authorization (5% of Award)	\$47,210		
Equals			
Total RHP Funding for Projects FFY 21	\$896,989		

2. Reprogramming of Funds

During any fiscal year, DOH may recapture funds. Recaptured funds may come from:

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

Any reprogrammed funds obtained during the FY will be reallocated 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

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery from a substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- · Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

Any activity not specifically authorized by HUD program regulations will be considered to be ineligible for assistance under the Recovery Housing Program.

Limitations on eligible activities are detailed in Section 6, Program Eligibility and Threshold Requirements, below.

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

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI persons. 24CFR 570.208(a)(2) and 570.483(b)(2)(i)(B) expand Limited Clientele criteria to enable assistance for acquisition, rehabilitation, reconstruction, or new construction activities, when at least 51% of beneficiaries are LMI. Any cost or other limitations on beneficiary participation may not be prohibitive for low-income persons. In addition, 24CFR 570.208(a)(2)(i)(A) or 570.483(b)(2)(ii)(A) expands eligible categories of Limited Clientele to include persons who meet the federal poverty limits or persons who are insured by Medicaid.

5. Application Selection Process and Procedures

DOH will issue a Notice of Funding Availability (NOFA) in order solicit proposals for funding consistent with the eligible activity requirements of RHP. DOH will provide adequate advance notice of fund availability and 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 an eligible applicant in a funding round. Notification of such limitation will be included in DOH's NOFA should DOH elect to set such a limitation.

6. Program Eligibility and Threshold Requirements:

DOH has established the following threshold requirements in order for applicants to be eligible to apply for funds:

- Eligible applicants: nonprofit corporations, municipal and tribal governments;
- Eligible activities: must benefit individuals in recovery from a substance use disorder and are limited to:
 - Acquisition of real property;
 - Lease, rent, and utilities;

- Rehabilitation and reconstruction of multi-unit residential buildings;
- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- New construction of housing.
- National Objective: Each proposed activity must meet at least one national objective and must be fully supported within the application;
- Statement of Compliance: Applicants must be in compliance with all existing department assistance agreements and cannot be in default under any CHFA or HUD administered program.

7. Application Evaluation Process:

Proposals will be evaluated by a review team on applicant qualifications including but not limited to:

- financial capacity of the applicant to provide and/or coordinate the provision of necessary services;
- organizational capacity of the applicant to provide and/or coordinate the provision of necessary services;
- past positive history of the applicant with DOH.

DOH will conduct due diligence and evaluate all eligible applications using the evaluation criteria described herein. Depending on the nature of the proposed activity, site inspections may be conducted by DOH staff or its agent. An evaluation of the site's feasibility will be completed and considered as part of the final review. Staff/agent review will include but not be limited to the following:

- detailed project description including map showing project location;
- Project participants and partners including names of lead applicant(s), leasing agencies, equity provider, source of permanent financing and owner of assets after project completion, as applicable;
- project budget and requested grant amount;
- consistency with the RHP program national objectives.

All final decisions are left to the discretion of the DOH Commissioner.

8. Funding Priorities:

As mandated by the SUPPORT Act, The State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Cares, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

9. Program Income/Technical Assistance/Matching Requirements

Grant administration will be capped at 5% of the allocation. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance. Administration matching funds are not required.

10. Monitoring for Recovery Housing Program Funds

The Department of Housing shall make reviews and audits of any designated public agencies, units of general local government, and subrecipients. In the case of noncompliance, the state shall take action to prevent further efficiencies and mitigate consequences (24 CFR 570.492).

Additionally, under 24 CFR 58.49 (b) – responsible entity for environmental review, the Department of Housing shall be the responsible agency for submitting the Request for Release of funds to HUD for approval.

11. Reporting on Recovery Housing Program Funds

The accomplishments for the State of Connecticut Recovery Housing Program for Federal Fiscal Year 2020 and Federal Fiscal Year 2021 will be provided upon guidance from HUD with 100% expenditure of funds by September 1, 2027.

VI ATTACHMENTS TO THE RHP ACTION PLAN

Attachment A – Amended Citizen Participation Process

Attachment B - Citizen Participation Documents

Attachment B Legal Notice(s) for Virtual Public Hearing and Public
 Comment Period for the State of Connecticut Recovery Housing
 Program Action Plan for Federal Fiscal Year 2020 and Federal
 Fiscal Year 2021

Attachment A

Amended Citizen Participation Plan

The following is the citizen participation and engagement process that will be utilized by the Department of Housing ("**DOH**") to solicit participation and input into the planning process for the development of the Five Year Consolidated Plan for Housing and Community Development ("**ConPlan**") and the Annual Action Plans ("**AAP**") that support it. In addition, this process will be used whenever possible in the development of all other plans and amendments prepared by DOH. This includes the development of the Analysis of Impediments to Fair Housing Choice ("**AI**"), as well as any required state plans and amendments that support the housing and community development activities of DOH.

Periodically throughout any given year, DOH staff will meet with state agency partners and major interest groups to discuss a variety of housing and community development issues in order to collect information on needs, priorities and issues of interest.

• These meetings will be part of continuous input into the departments' planning and policy development activities as they relate to housing and community development issues.

These major interest groups include, but are not limited to:

- the chief elected officials of entitlement and non-entitlement communities
- the Connecticut Branch of the National Association of Redevelopment Officials
- the Balance of State: Continuum of Care
- other Continuum of Care in Connecticut
- the nonprofit and for profit development community
- the Councils of Government and other regional planning organizations
- the legal aid organizations
- the housing advocacy community

Whenever possible, prior to the development of any relevant plan, the DOH will:

- Hold at least one public meeting, which may include a virtual public meeting, to solicit input in the development of such plan.
 - o If a virtual meeting is being held, the meeting will also have a call in number for those individuals who do not have computer access.
 - Notice of this meeting will be published approximately 1 week in advance of the meeting, in at least 3 newspapers serving all regions of the state, as well as the state's minority communities.
 - o In addition, notice of the meeting will be emailed to the above referenced major interest groups, and/or other state agencies as well as all interested residents of Connecticut who have expressed an interest in receiving information on all activities of the Department, known as the "Community Partners" list.

• Solicit written comment/input into the development of such plan for not less than five (5) days.

Staff will prepare a draft plan, taking into consideration the input received as a result of input/comment from the above listed organizations, state agencies and interested parties. As appropriate, the plan will 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.

DOH will:

- Post the draft plan in a prominent place on the DOH website.
- Prepare a notice of the publication of such plan ("**Notice**") and such Notice will include information on the following opportunity for input/comment:
 - ODH will hold at least one public meeting, which may include a virtual public meeting, to solicit input in the development of such plan.
 - If a virtual meeting is being held, the meeting will also have a call in number for those individuals who do not have computer access.
 - Notice of this meeting will be published approximately 1 week in advance of the meeting, in at least 3 newspapers serving all regions of the state, as well as the state's minority communities.
 - The Notice will include the opportunity to provide electronic comment for a period of not less than five days.
 - As part of the Notice, the state will provide information on how citizens who have special needs may obtain the draft plan in a form which is accessible to them.
- In addition, the Notice will be emailed directly to the above referenced major interest groups, and/or other state agencies as well as all interested residents of Connecticut who have expressed an interest in receiving information on all activities of the Department, known as the "Community Partners" list.

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 DOH 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 public hearing or during the public comment period will be considered by DOH before the final plan is submitted to U.S. Department of Housing and Urban Development (HUD). A summary of the comments and the agency's responses will be included as an attachment to the final action plan.

The procedures and actions discussed above will constitute the state's citizen participation plan for HUD related documents that require citizen participation.

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

ATTACHMENT B:

NOTICE OF VIRTUAL PUBLIC HEARING AND COMMUNITY INPUT PERIOD

The State of Connecticut Department of Housing Is seeking public input on the Draft State of Connecticut Recovery Housing Program (RHP) Action Plan for

Federal Fiscal Year 2020 and Federal Fiscal Year 2021

A fifteen (15) day community input period will begin on Thursday, July 15, 2021 and end on Friday, July 30, 2021. The Department of Housing is seeking community input on the Draft State of Connecticut Recovery Housing Program (RHP) Action Plan – Federal Fiscal Year 2020 and Federal Fiscal Year 2021. This plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) in order to be eligible to receive funding under the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act), which was passed in 2018. The intent of the pilot Recovery Housing Program (RHP) is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing.

The Department of Housing will conduct a VIRTUAL PUBLIC MEETING on Thursday, July 29, 2021 beginning at 10:00 AM and ending when all attendees have had an opportunity to provide input and comment. Housing authorities, municipalities, non-profits, advocates and the general public are invited to attend this public meeting and provide input/comment on the Draft State of Connecticut Recovery Housing Program (RHP) Action Plan – Federal Fiscal Year 2020 and Federal Fiscal Year 2021. If you or your organization is interested in participating in the VIRTUAL PUBLIC MEETING, please send an e-mail to CT.HOUSING.PLANS@ct.gov with "Virtual Public Meeting – State of Connecticut Recovery Housing Program (RHP) Action Plan – Federal Fiscal Year 2020 and Federal Fiscal Year 2021" in the "Subject" line. An E-mail link will be sent to all registered participants using the Microsoft TEAMS application.

DOH will also accept electronic input/comment on the administration of these funds through 5:00 pm on Friday, July 30, 2021 at CT.HOUSING.PLANS@ct.gov. All input and comments received will be taken into consideration. For a copy of the Recovery Housing Program Action Plan, please refer to the Department of Housing's website, http://www.ct.gov/doh under Notices and Publications, or you may request a copy via email at the above address.

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 the Department of Administrative Services - Small Agency Resource Team 860-270-8022.