

District of Columbia’s Amendment to the Citizen Participation Plan (CPP) and Amendment to the FY2020 (HUD FY 2019) Annual Action Plan (AAP) for the release of CARES Act 2019 Supplemental Funding and Community, Planning and Development (CPD) Entitlement Funds issued by the U.S. Department of Housing and Urban Development (HUD)

Amendments in Effect Through September 30, 2021

District of Columbia’s Amendment to the Citizen Participation Plan (CPP), in Effect through September 20, 2021

The District of Columbia (DC) would like to present to its residents, partners, and stakeholders, an amendment to its Citizen Participation Plan, outlined in the Five-Year Consolidated Plan dated 2016-2021. The U.S. Department of Housing and Urban Development (HUD) views citizen participation as “the heart” of the Consolidated Planning Process for Participating Jurisdiction’s (PJ), like DC. As a recipient of Community, Planning, and Development (CPD) Entitlement funds from HUD, citizen participation and consultation by community partners and stakeholders drives how a community, that receive these funds, determine needs, set priorities, identify resources, set goals, administer the programs and evaluate performance.

Per the newly published HUD guidance delivered because of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Public Law 116-136, signed into law on March 27, 2020, to combat the effects of COVID-19, the following Citizen Participation Plan Amendment is proposed.

Currently, the District’s Citizen Participation Plan states:

“The Department of Housing Community Development (DHCD) will oversee citizen participation required to develop and implement HUD-funded plans. Input on Emergency Solutions Grant (ESG) and Housing Opportunities for People with AIDS (HOPWA) will be coordinated with the Department of Human Services (DHS) and Department of Health (DOH), now known as DC Health. Final reports will summarize public comments received in writing/ oral and the District’s response to them. Efforts must be made to encourage participation from a wide range of stakeholders such as Continuum of Care, nonprofit organizations, developers, low-income households, residents of low-income areas, government, and other key stakeholders.

Consolidated Plan/ Assessment of Fair Housing Development: Provide HUD data before the start of community engagement. Hold 1 hearing before the development of the draft, publish plan/ study for 30 days, and hold 1 hearing after draft development.

Amendments to the Consolidated Plan: Substantial amendment will be triggered if: 1 - Distribution of funds greater than 25% of the allocated strategic goal in the Consolidated Plan, 2 - Distribution of funds greater than 25% of a program or project in an annual action plan year, or 3 - Implementation of a project that is not previously supported by a goal in the Consolidated Plan. Before submission to HUD for final approval, amendments and justification for changing

the Plan shall be published online and in the DC Register. After a minimum 30-day public comment period, hold 1 public hearing.

Annual Action Plans: Hold 1 public hearing before budget formulation to assess community needs. Publish a draft plan on DHCD, DOH, and DHS website. After a minimum 30-day comment period, hold a final public hearing before the submission to HUD.”

To ensure that we deliver funding expeditiously during the COVID-19 Pandemic, the District has reviewed its current Citizen Participation Plan and is announcing the following changes, per HUD guidance under the CARES Act 2019 Supplemental Funding.

Proposed Changes to the Citizen Participation Plan

A Substantial Amendment is now defined as:

1. a new program or project, not previously identified in the Consolidated Plan, or
2. a new program or project, in which more than 25% of the Entitlement dollars, to include Program Income, are re-directed from an existing program or project.

For a Substantial Amendment to any Consolidated Plan or Annual Action Plan:

- Residents will have five (5) days to review the substantial amendment.
- During the five (5) day review period, comments may be sent to OPMQuestions@dc.gov.

For the FY 2021 Annual Action Plan, due to HUD no later than August 16, 2020:

- Residents will have (10) days to review the new document.
- During the ten (10) day review period, comments may be sent to OPMQuestions@dc.gov.
- A minimum of one (1) survey will be distributed to the public. The distribution will be electronic or paper, upon request, and will be advertised through DHCD, DHS, DC Health, and their partners.
- One (1) “virtual” public hearing will be conducted, subject to platform availability.

For the FY 2020 Consolidated Annual Performance and Evaluation Report (CAPER), due to HUD no later than December 31, 2020:

- Residents will have ten (10) days to review the new document.
- During the ten (10) day review period, comments may be sent to OPMQuestions@dc.gov.
- A minimum of one (1) survey will be distributed to the public. The distribution will be electronic or paper, upon request, and will be advertised through DHCD, DHS, DC Health, and their partners.
- One (1) public hearing, “virtual” or “in-person” will be conducted. Platform determination will be made per social distancing laws and “virtual” hearings are subject to platform availability.

District of Columbia’s Amendment to the FY 2020 Annual Action Plan Amendment to receive allocation of CARES Act 2019 Supplemental Funding

On April 2, 2020, the U.S. Department of Housing and Urban Development (HUD) notified the District of Columbia (DC) that it would receive the following CARES Act 2019 Supplemental Funding Allocations.

| Funding Source | Amount | Recipient |
|--|--------------------|--|
| Community Development Block Grant *(CDBG-CV) | \$9,105,576 | Department of Housing and Community Development (DHCD) |
| Emergency Solutions Grant *(ESG-CV) | \$4,602,197 | Department of Human Services (DHS) |
| Housing Opportunity for People with AIDS *(HOPWA) | \$1,611,314 | Department of Health (DC Health) |

**CARES Act 2019 Supplemental Funding*

The Department of Housing and Community Development (DHCD), the Department of Health (DC Health) and the Department of Human Services (DHS) are planning the following uses for their respective CARES Act 2019 Supplemental Funding Allocations. Project determinations were based on outreach to our Community-Based Organizations and feedback on needs from our citizens and stakeholders, to help our community through the COVID-19 Pandemic.

Proposed Use of CDBG-CV Allocation

COVID-19 Emergency Housing Assistance \$6,200,000

DHCD is proposing the use of CARES Act 2019 Supplemental Funding for up to three months of COVID-related rental arrears to low-income households. The program will specifically assist those persons unable to afford their housing due to the Covid-19 Pandemic that are not currently assisted by the District’s pre-existing Emergency Rental Assistance Program or other local and federal project- and tenant-based rental assistance efforts. The program may also assist low income homeowners with mortgage arrears if industry efforts and federal and local mortgage relief requirements prove insufficient and funds are available.

COVID-19 Program Administration for COVID-19 HOME Program Tenant-Based Rental Assistance (TBRA) Program \$300,000

DHCD is implementing a COVID-19 Emergency HOME Tenant-Based Rental Assistance Program for residents currently residing in the District of Columbia who lost their jobs due to COVID-19. DHCD is proposing using CARES Act 2019 Supplemental Funding to pay for the management of the TBRA Program, to cover the cost of salaries, overhead, and compliance requirements for the program. The TBRA Program will assist tenants in smaller affordable properties where a dramatic decrease in cash flow due to

the COVID-19 Pandemic is putting building operations and therefore the building tenants at risk.

COVID-19 Residential Building Stability

\$500,000

In addition to the general goal of assisting low-income renters to avoid housing insecurity and eviction, we also need to be ready to address the impact of unanticipated costs associated with COVID-19 among our affordable housing partners. With mandated social distancing and increased cleaning requirements, properties are facing increased operating costs for cleaning supplies and increased payments for front line staff and deferred maintenance. With additional CDBG rental assistance, we can assist properties that did the right thing during the crisis and incurred additional costs or lost revenues due to taking actions to mitigate the spread of COVID-19.

COVID-19 Nonprofit Partners Capacity Support

\$1,000,000

Responding to the increase in inquiries and assisting in setting up these COVID-19 relief programs is straining our nonprofit partners. In addition to new programs and demand for their services, these partners face additional costs from cleaning to equipment to protect their front-line employees, and to deliver services remotely where feasible. We anticipate using a portion of any additional CARES Act 2019 Supplemental Funding as project delivery costs to assist nonprofit partners in delivering vital COVID-19 services that are eligible under CDBG.

COVID-19 Related Activities

\$1,000,000

As the pandemic continues to change and needs and resources continue to be identified, DHCD proposes to be able to use any remaining or additional allocations of CDBG-CV funds for the following programs, should the need arise.

Acquisition to include Buildings and Improvements, Including Public Facilities: DHCD would like the ability to use CDBG-CV funds to assist with assistance to buildings, building improvements, and public facilities to carry out eligible CDBG activities directly linked to COVID-19.

Planning: DHCD would like the ability to use CDBG-CV dollars to conduct data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans which will assist in combatting the effects of COVID-19.

Other Eligible CDBG Activities, Not Already Identified: The FY 2020 Annual Action Plan and this Amendment allow for DHCD to utilize a large pool of services for our community. However, as we have seen, this pandemic is ever-changing, and DHCD will need to remain flexible in carrying out its responsibilities to the Low-Income community. For a complete list of eligible activities, please refer to 24 CFR Part 570, Subpart B.

Small Business Grants: DHCD has repurposed existing CDBG dollars for a small business grant program.

Proposed Use of ESG-CV Allocation

COVID-19 Family Emergency Shelter Extension Hotels \$4,602,197

DHS will cover the costs of overflow emergency shelter extension hotels for families. Currently, the District is using these hotels to sustain access to the shelter through overflow motels until Short Term Family Housing sites are fully operational. Families residing at the shelter receive wrap-around case management services that would help them to quickly transition to permanent housing.

Proposed Use of HOPWA Allocation

COVID-19 Quarantine Housing Services \$125,000

Costs for short-term hotel/motel stays for eligible clients who may have been exposed to infectious diseases such as COVID-19.

COVID-19 Essential Services \$880,000

Assisting HOPWA eligible households in accessing essential services and supplies such as food, water, medications, medical care, transportation, and information. Providing nutrition services in the form of food banks or meal deliveries. Educating assisted households on ways to reduce the risk of getting sick or spreading infectious diseases such as COVID-19 to others.

COVID-19 Homeless Prevention \$500,000

Funds will be used to provide short term rental and utility assistance for persons living with HIV/AIDS who have experienced a loss of income resulting from the economic impacts of the coronavirus pandemic.

COVID-19 Resource Development \$9,636

Conducting local assessment and planning activities to ensure grantees and project sponsors are prepared to respond rapidly and effectively to emergencies and infectious disease outbreaks in their programs. Assessing and implementing modifications to workflow and program design in response to infectious diseases such as COVID-19 that may impact eligible household access to housing and services.

COVID-19 General Administration \$96,678

Creating a disaster response plan for the local HOPWA program to ensure access to housing and services for eligible households during crises.

District of Columbia’s Amendment to the FY 2020 Annual Action Plan Amendment to potential receipt of Community Development Block Grant (CDBG) – Disaster Recovery (DR) or Community Development Block Grant (CDBG) Section 108 Loan Program Funding

As with COVID-19, emergencies happen without warning, and federal funding assists in mitigating the impact of said emergencies on low-income families and businesses located in the District. From time to time, the U.S. Department of Housing and Urban Development (HUD) releases additional funding under “Disaster Response” through the Community Development Block Grant-Disaster Recovery (CDBG-DR) Program or low-interest Community Development Block Grant-Section 108 Loan (CDBG-108) Program.

Should an unforeseen emergency occur before October 1, 2020, and CDBG Disaster Recovery or CDBG Section 108 funding becomes available to the District, DHCD is proposing that those funds be used to bolster existing programs in the following manner, per 24 CFR Part 270.

- Emergency Housing Assistance
- Housing Counseling Services
- Small Business Technical Assistance
- Small Business Grants
- Economic Revitalization of Disaster Areas and Economically Burdened Areas

Should funding become available proposed budgets will be posted on the DHCD website for a 5-day comment period.

All forms of citizen participation will continue to comply with the District's Language Access Act requirements as requested. Additionally, reasonable accommodation requests will continue to handle in a manner consistent past practices. Please email your comments or questions to OPMQuestions@dc.gov. Comments may also be mailed to the Department of Housing and Community Development, Office of Program Management (OPM), C/O Resident Comments, 1800 Martin Luther King Jr. Ave., SE, Washington, DC 20020.