

**THE 2019-2023 CONSOLIDATED PLAN  
FOR  
HUD PROGRAMS  
  
INCLUDING THE  
2020 ANNUAL ACTION PLAN**

**Chief Executive Officer  
Michael L. Thurmond**

Board of Commissioners

District 1  
Nancy Jester

District 2  
Jeff Rader

District 3  
Larry Johnson

District 4  
Steve Bradshaw

District 5  
Mereda Davis Johnson

District 6  
Kathie Gannon

District 7  
Lorraine Cochran-Johnson



Responsible Entity:  
DeKalb County Community Development Department

Allen Mitchell, Director

JUNE 16, 2020

# **Delegation of Authority for the Administration of DeKalb County HUD funded Programs:**

**Pursuant to Section 14(b) of the Organizational Act of DeKalb County, the DeKalb County CEO, Michael Thurmond is delegating his authority for the administration of the Programs funded by the U.S. Department of Housing and Urban Development (HUD).**

**Specifically, the Block Grant Programs affected are Community Development Block Grant Program (CDBG), Emergency Solutions Grant Program (ESG), and the HOME Investment Partnership Program. The administration of the aforementioned Block Grant programs is being delegated to the Community Development Director, Allen Mitchell. Mr. Mitchell is authorized to execute and administer grant work on behalf of CEO Michael Thurmond.**

## DEKALB COUNTY HUD ALLOCATIONS

Year	2018	2019	2020
<b>CDBG</b>	<b>\$5,249,506</b>	<b>\$5,260,167</b>	<b>\$5,260,632</b>
<b>HOME</b>	<b>\$2,293,057</b>	<b>\$2,156,360</b>	<b>\$2,338,083</b>
<b>ESG</b>	<b>\$427,296</b>	<b>\$445,432</b>	<b>\$462,199</b>
<b>TOTAL</b>	<b>\$7,969,859</b>	<b>\$7,861,959</b>	<b>\$8,060,914</b>

## CONTINUUM OF CARE (CoC) ALLOCATIONS

Year	2018	2019	2020
<b>TOTAL</b>	<b>\$5,144,877</b>	<b>\$5,803,531</b>	<b>—</b>

# 2020 ANNUAL ACTION PLAN DRAFT BUDGET SUMMARY

January 1, 2020 – December 31, 2020

<b>I.</b>	<b>2020 CDBG Allocation</b>		<b>\$5,260,632</b>
	Projected CDBG Program Income	\$ 343,000	
	<b>Total CDBG</b>		<b>\$5,603,632</b>
<b>II.</b>	<b>2020 HOME Allocation</b>		<b>\$2,338,083</b>
	Projected HOME Program Income	\$ 446,404	
	<b>Total HOME</b>		<b>\$2,784,487</b>
<b>III.</b>	<b>2020 ESGP Allocation</b>		<b>\$ 462,199</b>
<b>IV.</b>	<b>GRAND TOTAL</b>		<b>\$8,850,318</b>

## Program Income Information

### CDBG Program Income Sources

	<u>Amount</u>	<u>Disposition</u>
Recapture Funds	\$ 73,000	CDBG Capital Improvement Projects
Program Income (prior year)	\$ 0	
Program Income	\$ 0	
Program Income Projection	<u>\$ 270,000</u>	

**Total CDBG Program Income Sources**                    **\$ 343,000**

### HOME Program Income Sources

	<u>Projected Amount</u>	<u>Disposition</u>
HOME Multi-Family Loan Repayment	\$ 260,000	HOME Investment Trust Account
HOME Recapture Funds	<u>\$ 186,404</u>	

**Total HOME Program Income Sources**                    **\$ 446,404**

## **Program Policy for Program Income**

1. Twenty percent of CDBG Program Income will be used for Planning and Administration. The remaining balance will be used for other eligible activities.
2. Up to twenty-five percent of the HOME Program Income will be used for Planning and Administration in accordance with the CARES ACT passed into law, March 27, 2020 for the FY 2020.
3. CDBG regulations require program income to be used before Treasury funds are expended. Program Income will be used for any approved eligible activity as outlined in the 2019-2023 Consolidated Plan.
4. If more program income revenue is received than anticipated for any activity, the additional funds will be appropriated to activities indicated in this policy.
5. The designated entity that the County contracts to manage the Economic Development Revolving Loan Fund may retain the program income for approved small business loans in DeKalb or return the funds to the County. The County must approve the loan fund programs that utilize County funds and program income generated from repayment of loans that were made with County funds.
6. HOME Program Income and Recapture amounts reflect availability as of the date of the development of this plan. Additional amounts received in 2020 will be reported in the 2020 Annual Action Plan and committed within 24 months of HUD allocation dates for 2020. This commitment will occur within two years of the HUD allocation date for 2020 funds.
7. Program income receipts may vary widely from amounts projected due to any number of unanticipated factors. Regardless of the amount received, the Consolidated Plan will not need to be amended unless the funds are used for activities not outlined in the 2019-2023 Consolidated Plan or other approved eligible activities.

<b>1. PUBLIC FACILITIES IMPROVEMENTS</b>	<b>\$1,166,000</b>
A. East DeKalb Senior Center Bruce Street	\$ 600,000
B. City of Chamblee Sidewalk Project	\$ 165,000
C. DeKalb Planning Dept – Memorial Dr. Corridor	\$ 80,000
D. Decatur Christian Towers	\$ 150,000
E. City of Lithonia Main Street Streetscape Plan	\$ 65,000
F. Activity Delivery Cost	\$ 106,000
<b>2. LOAN/BOND REPAYMENT</b>	<b>\$ 814,361</b>
A. HUD Section 108 Loan Repayment – Estimated Annual Repayment Amount - \$814,361	
<b>3. ECONOMIC DEVELOPMENT</b>	<b>\$ 313,500</b>
A. DeKalb Small Business Micro-Enterprise Training Program	\$ 115,000
B. DeKalb Revolving Loan Fund/Loan Servicing	\$ 170,000
C. Activity Delivery Cost	\$ 28,500
<b>4. PUBLIC SERVICES</b>	

**COC/Homelessness/Assistance**

A. Africa's Children Fund	\$23,400
B. Buckhead Christian Ministry	\$25,000
C. Caring Works	\$50,000
D. CoC Coordinated Entry Case Management	\$45,000
E. DeKalb Drug Court Housing Program	\$35,000
F. Furniture Bank of Metro Atlanta	\$25,720
G. Hosea Feed the Hungry	\$25,000
H. Jerusalem House, Inc.	\$37,400
I. Latin American Association	\$35,000
J. Safe Haven Transitional, Inc.	\$15,000
K. Salvation Army, Atlanta Temple Corp	\$50,000
L. Salvation Army, Red Shield	\$50,000
M. Society of St. Vincent de Paul	\$25,000
N. TBRA Case Management Services	\$35,000
O. United Methodist Children's Home	\$35,000

**Domestic Violence**

P. Men Stopping Violence	\$20,000
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**Financial Literacy**

Q. Catholic Charities of Atlanta	\$15,000
R. Center for Pan Asian Communities	\$15,000
S. Literacy Action	\$35,000
T. New American Pathways	\$35,000

**Fair Housing /Foreclosure Prevention**

U. Atlanta Legal Aid Society	\$70,000
V. Metro Fair Housing Services	\$52,000

**Youth/ Child Development**

W. International Rescue Center	\$ 30,000
X. Our House, Inc.	\$ 75,000
Y. Scottdale Early Learning	\$ 70,000
Z. Sheltering Arms	\$ 35,000
AA. Youth Vouchers Set Aside	\$100,000

**SUBTOTAL** **\$1,063,520**

**5. HOUSING ACTIVITIES**

A. Special Purpose Housing Repair Program (SPHRP)	\$ 374,000
B. Implementation Services for SPHRP	\$ 76,000
C. Demolition & Blight	\$ 600,000
D. Housing Implementation Services – Demolition	\$ 63,000

**SUBTOTAL** **\$1,113,000**

**PLANNING AND PROGRAM ADMINISTRATION**

Community Development Administration \$1,133,251

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## ADDITIONAL CDBG RECOMMENDATIONS

1. The following projects are aligned with the goals and objectives of the 2019-2023 Consolidated Plan. If funds are available, these projects listed below will move forward in accordance with the County's priorities.
  - a. City of Lithonia Lodge Renovation Project and Main St. Streetscape Plan
  - b. Tobie Grant Recreation Center Construction Project
  - c. FODAC freight accessibility when agency has additional funding (\$172,000)
  - d. District #4 & #7 Community and Senior Center Project (Cost associated with additional architectural design & engineering, construction and/or furnishing cost, or other associated costs)
  - e. DeKalb Juvenile Court ADA Improvements
  - f. DeKalb Juvenile Court Crown Youth Development Program
  - g. Ser Familia Homeless Prevention Program
  - h. DeKalb County Bridge Housing Initiative
  - i. Assist Arabia Alliance in the preservation of the Old Colored School Site
2. Access to Capital for Entrepreneurs (ACE) has as a part of their contract, a loan servicing component that covers three (3) major portfolios HOME, NSP and CDBG. This contract also includes underwriting for the applicants of the DeKalb Small Business loan program.
3. In the administration of the DeKalb County Small Business Loan Program, the County will institute a Small Business Loan Committee. This Committee will review and make final loan decisions after receipt of Community Development staff's recommendation.
4. The Community Development Department is working with Facilities Management to construct the Tobie Grant Intergenerational Center. Parks will run the facility once completed. Community Development is paying for architectural and engineering services. Construction will be paid from County CIP account and from 2020 and 2021 CDBG funding allocations if needed.
5. HUD Section 108 Loan Program – The Community Development Department will consider the use of Section 108 Loan Program funds to finance the building of large-scale eligible Capital Improvement Projects and Economic Development projects in the County or in municipalities. The mechanism for repayment of these projects will be from the County General Fund and/or CDBG, municipalities or business funds.
6. CDBG funds will be used for any approved eligible activity as outlined in the 2019-2023 Consolidated Plan. Because CDBG regulations require program income to be used before Treasury funds are expended, flexibility with obligating program income is needed in order to comply with the HUD regulations.

7. The Community Development Director may approve the use of CDBG funds for eligible Capital Improvement Projects submitted by local municipalities and County Departments during the program year if they meet eligibility requirements.
8. The DeKalb County Community Development Department is authorized to reallocate funding of prior year projects that are no longer feasible or needed. Reallocating previously funded projects will allow for other approved projects to utilize prior year or current year funds. Through the reallocation process, the Community Development Department can utilize/reallocate funds immediately to ensure compliance with HUD guidelines and regulations.
9. The remaining HUD Section 108 Loan principle loan amount is approximately \$7.1 Million with an amortization period of 10 years (2020-2030), at an estimated fixed interest rate of 2.54%. The annual loan repayment amount will be approximately \$814,361.
10. If funds are available in the eligible category, they may be used to assist with providing services to fill the services gap in the DeKalb Continuum of Care for the Homeless and meet other needs in DeKalb neighborhoods. The DeKalb County Community Development Department will collaborate with DeKalb County Continuum of Care representatives and other service providers to identify and prioritize service gaps.
11. At the direction of the Community Development Department Director, CDBG funds may be used to fulfill any eligible match requirements that are associated with ESG and/or CoC funding.
12. The Community Development Department Director is authorized to designate CDBG funds to an agency to administer case management services for the Tenant Based Rental Assistance Program.
13. The Community Development Department Director is authorized to designate CDBG funds to an agency to administer case management services for the Continuum of Care Coordinated Intake.
14. Program Income receipts from the NSP Grant shall be converted to CDBG program income receipts and used for CDBG eligibility activities upon the authorization of HUD and the Community Development Director.
15. The Community Development Director may authorize the use of CDBG funds to conduct surveys and counts of homeless and at-risk individuals in the County in order to determine housing needs for those populations.
16. The Community Development Director is authorized to accept additional HUD/COG grants for homelessness mitigation and to allocate eligible CDBG funds for grant matching requirements.

17. The Community Development Director is authorized to sign off on and approve small business loans under the CDBG Small Business Loan Program.
18. The Community Development Director is authorized to move funds from the CDBG, ESG and HOME administration line item to fund other projects within those grant programs.
19. In response to the COVID-19 pandemic the Community Development Department will follow HUD guidance outlined in the CARES ACT passed into law, March 27, 2020 for the FY 2020 CDBG Program funding:
  - a. Eliminates the 15 percent cap on the amount of grant funds used for public services activities. *Following enactment, the cap in Section 105(a)(8) of the HCD Act and 24 CFR 570.201(3) has no effect on CDBG-CV and no effect on FY 2019 and 2020.*
  - b. Provides that grantees may amend citizen participation plans to establish procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and the amended citizen participation plans.
  - c. In person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
  - d. Extends the deadline for grantees to submit action plans and other updates to their consolidated plans submissions for fiscal years 2019\* and 2020 to August 16, 2021. *Without extension, the deadline for fiscal year 2020 grants would be August 16, 2020, in accordance with section 116(b) of the HCD Act and 24 CFR 91.15.*

**HOME INVESTMENT PARTNERSHIPS PROGRAM - BUDGET SUMMARY  
JANUARY 1, 2020 – DECEMBER 31, 2020**

**2020 HOME Allocation \$2,784,487**

31. HOME Program Administration (25% Set-Aside) \$696,121

32. HOME-Eligible Projects \$2,088,366

**TOTAL HOME ALLOCATION \$ 2,784,487**

**NOTES:**

1. The Community Development will use HOME funds to provide loans to assist in the development for affordable units in the following projects. During 2020, the Department will accept, underwrite, and approve additional loans for the development of affordable units in DeKalb County

Project	Loan Amount
Starnes Senior Housing	\$1,200,000
Scott Senior Housing	\$ 400,000

2. The Community Development Department will assess the need for Tenant Based Rental Assistance (TBRA). If it is determined that TBRA is needed to assist households in attaining appropriate permanent housing, the Department may implement a HOME TBRA program in response to general community needs and/or needs caused by the CoVID-19 pandemic. With the implementation of TBRA, Case Management services may be funded through CDBG.
3. The Department may implement additional rental assistance programs through ESG, ESG-CV, CDBG, and/or CDBG-CV in response to the COVID-19 pandemic.
4. As permitted by the HOME- CV Waiver, the County may commit funds to CHDOs and to the CHDO Reserve from its 2020 allocation for the acquisition and/or rehabilitation of specific, eligible homebuyer properties or multi-family rental properties to be owned, developed or sponsored by qualified Community Housing Development Organizations (CHDOs). The County CHDOs will be selected during open application/certification processes. Selection may occur once or multiple times per year.
5. The County will commit available HOME program income and recaptured funds (\$260,000) for eligible projects. This commitment will occur within two years of the HUD allocation date for 2020 funds.

6. The County works closely with the DeKalb Housing Authority in the administration of its CDBG, HOME, NSP1 and NSP3 Program activities related to the development and implementation of affordable housing assistance programs and projects. **The Housing Authority acts as an agent and sub-recipient on a number of HOME activities.** Many of these activities are undertaken through the County's ongoing contract with the Housing Authority and are developed and implemented in accordance with the program descriptions executed by the Housing Authority Executive Director and the Community Development Department Director. The County may work with the DeKalb Housing Authority or other approved entities. The following is a listing of potential activities that may be undertaken by the County with HOME funds in the upcoming program year and details outlining how they may be administered.
  - a. Unless otherwise approved, all multi-family projects will be implemented under the Housing Authority's contract with the County following a competitive application process and thorough review of the project for compliance with the County's underwriting guidelines as outlined in the HOME application package. This includes multi-family developments using CHDO funds. The Community Development Department Director is authorized to commit funding amounts and determine loan terms for these projects.
  - b. Tenant-based Rental Assistance programs may be administered by the Housing Authority under its contract with the County or by other approved entities through separate agreements.
  - c. When the County pursues additional affordable housing initiatives in the County will partner with the DeKalb Housing Authority and/or other entities on development activities.
7. The Community Development Department Director may approve interchanging the use of CDBG, HOME, NSP 1, and NSP 3 funds for projects if all program eligibility standards are satisfied.
8. The County will consider Tenant-based Rental Assistance on special initiatives consistent with the needs identified by the DeKalb Continuum of Care or special needs that may be identified by the County.
9. The Community Development Department Director shall provide comments and letters of support to the Georgia Department of Community Affairs regarding Tax Credit applications or to other entities regarding potential funding for applicants.
10. The Community Development Department will work with the County Departments and the community to identify and prioritize distressed multi-family properties in the County and develop collaborative strategies to remove blight.

11. In an effort to stabilize neighborhoods, prevent and/or reduce blight, and increase the availability of standard, affordable housing, the County may acquire, demolish, and/or redevelop substandard apartment complexes or single family residences using eligible CDBG, HOME, NSP 1, NSP 3, Program Income, and other funds.
12. The Community Development Director will act as the primary contact for affordable housing initiative and collaborate with other County Departments and community representatives to develop affordable housing plans and strategies for the County.
13. If funds are available in eligible categories, they may be used to assist in providing housing and/or services to fill the housing/services gap in the DeKalb Continuum of Care for the Homeless. The County will collaborate with DeKalb CoC representatives and other providers to determine areas of need.
14. In response to the COVID-19 pandemic the Community Development will follow HUD guidance outlined in the CARES ACT passed into law, March 27, 2020 for the FY 2020 HOME Program funding:
  - a. Waiver of the 10% Administration and Planning Cap, a Participating Jurisdiction (PJ) may expend up to 10 percent of its annual HOME allocation, plus any program income received, for administrative and planning costs. These provisions are suspended to enable the PJ to expend up to 25 percent of its FY 2019 and FY 2020 allocations and program income received for administrative and planning costs.
  - b. Waiver of the CHDO Set-aside Requirement, the suspension and waiver are required to relieve the PJ of requirements that may impede the obligation and use of funds to expeditiously assist families affected by the COVID-19 pandemic. Suspension of the CHDO set-aside will immediately make additional HOME funds available for activities such as tenant-based rental assistance for which CHDO set-aside funds cannot be used.
  - c. Limits and Conditions on CHDO Operating Expense Assistance, the suspension and waiver of these requirements is required to ensure that CHDOs are able to maintain operations and retain staff capacity to own, develop and sponsor housing with CHDO set-aside funds to serve communities impacted by the COVID-19 pandemic.
  - d. Waiver of the matching contribution requirements, this match reduction applies to funds expended by a PJ located in Presidentially declared-disaster area between October 1, 2019 and September 30, 2021.
  - e. Waiver of income documentation, this waiver permits the PJ to use self-certification of income, as provided at §92.203(a)(1)(ii), in lieu of source documentation to determine eligibility for HOME assistance of persons requiring emergency assistance related to COVID-19.

- f. Waiver of on-site inspections of HOME-assisted Rental Housing, waiving the requirement to perform ongoing on-site inspections will help protect PJ staff and limit the spread of COVID-19. The waiver is in effect through December 31, 2020.
- g. Waiver the annual inspection of units occupied by recipients of HOME Tenant-Based Rental Assistance (TBRA). The waiver is applicable to annual HQS inspections required to occur from April 10, 2020 through December 31, 2020.
- h. Waiver of the Four-Year Project Completion Requirement. This waiver applies to projects for which the 4-year project completion deadline will occur on or after April 10, 2020. The completion deadlines for covered projects are extended to December 31, 2020.
- i. Waive the nine-month deadline for sale of homebuyer units. The waiver applies to projects for which the 9-month homebuyer sale deadline occurs on or after April 10, 2020 and extends the deadline for those projects to December 31, 2020.
- j. Waive the use of HOME Funds for operating reserves for troubled HOME projects. 24 CFR 92.210 establishes provisions to permit HOME rental projects that are not financially viable (i.e., projects for which operating costs significantly exceed operating revenue) to be preserved through the use of HOME funds to recapitalize project reserves through December 31, 2020.

**EMERGENCY SOLUTIONS GRANTS PROGRAM - BUDGET SUMMARY  
JANUARY 1, 2020 – DECEMBER 31, 2020**

**2020 Allocation \$462,199**

<b>AGENCY</b>	<b>Emergency Shelter Ops. &amp; Services</b>	<b>HMIS</b>	<b>Homeless Prevention</b>	<b>Rapid Re-Housing</b>	<b>Street Outreach</b>	<b>Admin.</b>	<b>Total</b>
35. Decatur Cooperative Ministry	\$52,000		\$36,000	\$50,000			<b>\$138,000</b>
36. Latin American Association			\$14,267				<b>\$14,267</b>
37. Partnership for Community Action			\$14,268				<b>\$14,268</b>
38. Rebecca's Tent	\$15,000						<b>\$15,000</b>
39. HMIS		\$36,000					<b>\$36,000</b>
40. Salvation Army Peachcrest			\$20,000				<b>\$20,000</b>
41. Salvation Army Red Shield	\$65,000			\$15,000			<b>\$80,000</b>
42. Traveler's Aid / HOPE Atlanta	\$20,000		\$25,000	\$25,000	\$40,000		<b>\$110,000</b>
43. Local Admin						\$34,664	<b>\$34,664</b>
<b>44. TOTAL</b>	<b>\$152,000</b>	<b>\$36,000</b>	<b>\$109,535</b>	<b>\$90,000</b>	<b>\$40,000</b>	<b>\$34,664</b>	<b>\$462,199</b>

<b>Activity</b>	<b>Maximum Eligible Expenditures</b>	<b>Proposed</b>
<b>Emergency Shelter + Street Outreach* (60% Cap)</b>	\$277,319	\$192,000
<b>Administrative Costs (7.5% Cap)</b>	\$34,664	\$34,664



## **OTHER RECOMMENDATIONS AFFECTING EMERGENCY SOLUTIONS GRANTS PROGRAM PROVIDERS**

1. HUD requires a 7.5% cap on the funds for Administration, and a 60% cap on Emergency Shelter + Outreach. There is no cap on any other component.
2. Representatives from the DeKalb County Continuum of Care (CoC) are assessing services to determine gaps and establish new DeKalb County priorities for serving the homeless population. The Community Development Department Director is authorized to make the required funding changes to fill service gaps, align ESG funding with newly formed priorities, and satisfy HUD's guidelines and regulations. Changes may include funding agencies that are not shown in the 2020 allocation but have been recommended by the DeKalb Continuum of Care.
3. If for any reason and for any year Emergency Solutions Grants funds have been received and service providers cannot utilize the funds allocated, the funds will be considered for reprogramming to any of the approved ESGP service providers or providers who can fill a service gap in a manner that is identified by the Community Development Department Director.
4. All approved ESGP funding will be contingent upon the agency following all DeKalb County and statutory regulations.
5. The Community Development Department Director will be authorized to act on behalf of the County to provide certifications for non-profit agencies that must provide certification in order to receive from HUD, the Georgia Department of Community Affairs or other funders.
6. Any funds remaining from the previous year will be reprogrammed to agencies approved to receive FY 2020 ESGP funding or to providers who can fill a service gap in a manner that is identified by the Community Development Department Director with input from the DeKalb CoC.

### **Point-In-Time Count**

HUD mandates that each CoC conduct a biennial point-in-time count of homeless persons. To facilitate conducting this count and ensure that the County obtains information regarding its success in mitigating homelessness, the Community Development Department Director may authorize the use of CDBG or other eligible funds for the performance of the point-in-time count.

### **Re-Entry Program**

The State provides short term financial assistance (\$600 per offender per month for three months) to help stabilize the re-entry process of newly released convicted felons and enhance their ability to remain crime free. Following an agency housing/services assessment process, the Community Development Department will recommend approval or disapproval for agencies wishing to provide housing for this program. The final determination will be made by the Chief Executive Officer.

### **DeKalb County Continuum of Care (COC)**

In compliance with the HEARTH Act of 2012, the DeKalb County Continuum of Care (CoC) has formed committees to develop an organizational structure, establish priorities, assess service gaps, and implement a coordinated intake and service delivery system. When completed, the delivery system will include uniform requirements for the provision of homeless programs and services in DeKalb County. The delivery system will move to a Housing First model of rapidly re-housing homeless individuals and households.

The County has agreed to perform the role of Collaborative Applicant for the DeKalb CoC. In this role, the County will receive the HUD Planning Grant, receive other funds that support the goals of the CoC and collaborate with the State to administer the Homeless Management Information System (HMIS). As the Collaborative Applicant, the County may receive additional funds and may apply to become the Unified Funding Agent for the DeKalb CoC. At the direction of the Community Development Department Director, eligible CDBG funds may be used to pay for Department personnel performing CoC or homelessness mitigation work and fulfill any eligible match requirements that are associated with CoC and/or ESG funding.

In response to the COVID-19 pandemic the Community Development will follow HUD guidance outlined in the CARES ACT passed into law, March 27, 2020 for the FY 2020 ESG Program:

- a. The condition that the recipient must be the HMIS Lead to pay costs under 24 CFR 576.102(a)(2) is waived to the extent necessary to allow any recipient to use ESG funds to pay costs of upgrading or enhancing its local HMIS to incorporate data on ESG Program participants and ESG activities related to COVID-19. This waiver is in effect for 6-months beginning on April 10, 2020.
- b. The required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived for up to 2-years beginning on the date of this memorandum, so long as the recipient or subrecipient conducts the required re-evaluations not less than once every 6months.
- c. Waiving the monthly case management requirement as specified below will allow recipients to provide case management on an as needed basis and reduce the possible spread and harm of COVID-19.
- d. The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning on April 10, 2020. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.