

SUBSTANTIAL AMENDMENT TO THE CITY OF GREENSBORO 2019-2020 ANNUAL ACTION PLAN

A. EXECUTIVE SUMMARY

The City of Greensboro's federal Five-Year Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) for the period of 2015-2019. The Annual Action Plan details each year within the Five-Year Consolidated Plan and outlines the implementation of annual funding, which is developed through public input, analyses, and planning. The Greensboro City Council adopted the 2019-2020 Annual Action Plan (Annual Plan) on May 21, 2019 and submitted the document to the U.S. Department of Housing and Urban Development (HUD) before the required deadline date.

The City's Citizen Participation Plan (CPP) describes the efforts that the City will take to encourage its residents to participate in developing these plans. It also provides requirements for public process when a "substantial amendment" to the Annual Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the CPP:

- A change in the use of CDBG funds from one eligible activity to another
- Funding of a new project not previously described in the Annual Plan
- A change in the allocation or distribution of funds
 - Defined as when the dollar amount of that change is equal to, or greater than 25% of the City's current fiscal year federal allocation
 - E.g. CDBG is undergoing a substantial change when 25% or more of that year's CDBG allocation is affected
- A significant change to an activity's proposed beneficiaries or persons served

HUD has allocated special funds to the City of Greensboro, as authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19).

Due to COVID-19, HUD has issued guidance that waives the Citizen Participation Plan requirements for entitlement recipients, provided that (1) no fewer than five days are provided for public comment and that (2) reasonable notice and the opportunity to comment is provided. Additionally, HUD has awarded supplemental funding through the CARES Act that requires programming in the 2019-2020 Annual Action Plan.

B. CITIZEN PARTICIPATION

A five-day public comment period (May 14 – May 18, 2020) was published in the *Greensboro News & Record*, *Carolina Peacemaker*, and *Qué Pasa* and posted on the City website, informing the public of the proposed Substantial Amendment and inviting comments. Residents are able to review copies of the Substantial Amendment at www.greensboro-nc.gov/substantialamendment or may request a hard copy if needed. On May 19, 2020, the Greensboro City Council approved the submission of the substantial amendment and the CARES Act program funding.

C. CHANGES TO THE 2019-2020 ANNUAL ACTION PLAN

The City proposed the following amendments to the 2019-2020 Annual Action Plan in order to allocate additional program funding to an existing project and allocate the supplemental funding awarded by the CARES Act.

1. Program and authorize \$1,329,635 in CDBG-CV funding made available by the CARES Act to provide emergency shelter costs, hotel/motel vouchers, rental, mortgage, and utility assistance, employment training and COVID-related staffing costs;
2. Program and authorize \$675,621 in ESG-CV funding made available by the CARES Act to provide rapid rehousing services including hotel/motel vouchers and COVID-related staffing costs;
3. Program and authorize \$77,708 in HOPWA-CV funding made available by the CARES Act to provide additional housing assistance to people living with HIV/AIDS;
4. The reprogramming of \$504,258 prior year CDBG funds that were not expended;
5. Increase CDBG funding to Housing Rehabilitation project by \$504,258; from \$424,997 to \$929,255.

The following Table outlines the project budgets that are being modified to allocate funds to the projects described in this Substantial Amendment:

Table 1: Activity Budget Modifications and Reprogrammed Project Budgets

Program Year/ Project Title	Existing Budget	New Budget	Difference
<i>Reduce Funding/Unexpended</i>			
Prior Year Unexpended Funds	\$504,258	\$0	(\$504,258)
Subtotal			(\$504,258)
<i>Increase Funding/Programming</i>			
FY 19/20 Housing Rehabilitation Project	\$424,997	\$929,255	\$504,258
FY 19/20 CDBG-CV	N/A	\$1,329,635	\$1,329,635
FY 19/20 ESG-CV	N/A	\$675,621	\$675,621
FY 19/20 HOPWA-CV	N/A	\$77,708	\$77,708
Subtotal			\$2,587,222

D. PUBLIC COMMENTS

All public comments received during the five-day public comment period were incorporated into the overall Substantial Amendment submitted to HUD. The comments and responses are attached to this document.

E. 2019-2020 ACTIVITY DETAIL

Amend the projects in section AP-38 Project Summary, as follows (*additions*):

Table 2: AP-38 Project Summary Information

3	Project Name	FY 19/20 - Housing Rehabilitation
	Target Area	N/A
	Goals Supported	Promote a Suitable Living Environment
	Needs Addressed	Quality Living Environments
	Funding	CDBG: \$424,997 \$929,255
	Description	Rehabilitation of homeowner and rental housing including Lead Program match.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	25 56 low-moderate income families
	Location Description	Citywide
	Planned Activities	Rehabilitation of homeowner and rental housing including Lead Program match.
9	Project Name	<i>FY 19/20 – CDBG-CARES</i>
	Target Area	<i>N/A</i>
	Goals Supported	<i>Promote a Suitable Living Environment</i>
	Needs Addressed	<i>Homelessness Services</i>
	Funding	<i>CDBG-CV: \$1,329,635</i>
	Description	<i>Provide equipment, supplies, and materials necessary to carry out public service of shelter, provide hotel/motel vouchers, rental, mortgage, and utility assistance, employment training, case management, and COVID-related staffing costs.</i>
	Target Date	<i>6/30/2020</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>TBD</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Subsistence payments, employment training, emergency homeless shelter operations.</i>
10	Project Name	<i>FY 19/20 – ESG-CARES</i>
	Target Area	<i>N/A</i>
	Goals Supported	<i>Promote a Suitable Living Environment</i>
	Needs Addressed	<i>Homelessness Services</i>

	Funding	<i>ESG-CV: \$675,621</i>
	Description	<i>Rapid rehousing – provide case management services, deposit/rental assistance, and other eligible services as needed to keep individuals and families from experiencing homelessness due to the COVID-19 emergency.</i>
	Target Date	<i>6/30/2020</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>TBD</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Rapid rehousing</i>
11	Project Name	<i>FY 19/20 – HOPWA-CARES</i>
	Target Area	<i>HOPWA EMSA</i>
	Goals Supported	<i>Promote a Suitable Living Environment</i>
	Needs Addressed	<i>Homelessness Services</i>
	Funding	<i>HOPWA-CV: \$77,708</i>
	Description	<i>Tenant Based Rental Assistance (TBRA), Short Term Rental/Mortgage and Utility (STRMU) Assistance for low-income residents living with HIV/AIDS</i>
	Target Date	<i>6/30/2020</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>80 low-income individuals living with HIV/AIDS</i>
	Location Description	<i>HOPWA EMSA - Guilford, Rockingham, and Randolph counties</i>
	Planned Activities	<i>TBRA, STRMU</i>

**City of Greensboro Substantial Amendment to the
2019-2020 Annual Action Plan**

Summary of Citizen Participation Comments

*Public Comment Period on the proposed Citizen Participation Plan and proposed
Substantial Amendment to the 2019-2020 Annual Action Plan
May 14, 2020 – May 18, 2020*

Public comments submitted via email to Caitlin Bowers, Community Development Analyst, are summarized below.

Comment #1 –

Submitter: Audrey Berlowitz, resident

Friday May 15, 2020

Re: the proposed Citizen Participation Plan, the resident requested information on housing not overseen by HUD and asked if there was a way for tenants and landlords to come together to address issues.

Greensboro Response: City staff connected the resident with the City of Greensboro Landlord-Tenant Dispute Program in the Human Relations Department. Fair Housing Assessments are included and covered in the Citizen Participation Plan. No further action required at this time.

Comment #2 –

Submitter: Chip Berry, resident

Saturday May 16, 2020

The resident outlined the following comments:

- These funds are important to the many organizations assisting low income families and individuals. These organizations desperately need access to these funds. Since the impacted organizations were not directly notified by the City Staff, and are currently focused on meeting the needs of our low income citizens, some organizations might not be aware of the proposed changes. The needs and concerns of all these organizations should be a priority of City staff.
- The City should extend the comment period from the current five days to allow all organizations receiving HUD, FEMA and CARES funds to review the changes. The five day requirement is the minimum allowed by HUD and is an inadequate notice to consider such important changes.

- Beyond the minimum notification, organizations currently receiving funds should be notified of the comment period by the City staff.
- The City staff should review the changes with these organizations as well as members of the PEH prior to the end of the comment period.
- That any changes to these programs, grants or application processes be transparent, equitable and notified to current recipients equally.

Greensboro Response: Based on guidance provided by the U.S. Department of Housing and Urban Development on April 2, 2020, in a memorandum titled, “*Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19*,” the City of Greensboro was granted the flexibility to allow no less than five days for public comments on each substantial amendment and to determine what constitutes reasonable notice and opportunity to comment. These changes are reflected in the revised Citizen Participation Plan that was available for public comment May 14, 2020 – May 18, 2020 concurrently with the proposed substantial amendment. City staff contacted existing Neighborhood Development-contracted homeless service providers via email on April 28, 2020 regarding the need to allocate the awarded CARES Act funds.

Comment #3 –

Submitter: Glenn Turgeon, resident

Saturday May 16, 2020

The resident requested that their prior eviction issue from 2018 be mitigated before making plans on what to do with next year’s funding.

Greensboro Response: The resident has worked with the Greensboro Housing Coalition to mitigate the eviction issue as recent as February 2020. No further action will be taken to implement this comment in the Substantial Amendment to the 2019-2020 Annual Action Plan.

Comment #4 –

Submitter: Sofia Mosquera, Guilford County resident

Saturday May 16, 2020

The Guilford County resident was not satisfied with the proposed substantial amendment to the 2019-2020 Annual Action Plan and believes it does not prioritize the immediate crisis many of our residents are facing and the ongoing lack of housing stability. The resident stated that any new funding received at the local level ought to explore the possibility of immediate rental/mortgage/landlord assistance first, and then look at existing projects that improve housing quality, but do not directly prevent homelessness. The resident made the following project-specific comments:

- *Project FY 19/20 - Housing Rehabilitation*
Stated this is not a high-enough priority matter that merits the allocation of \$929,255 on 56 low- moderate-income families. Resident believes these funds would be better allocated towards short-term rent/mortgage relief for low-income residents.
- *Project FY 19/20 – CDBG-CARES*
Resident believes a higher percentage of the CDBG-CARES project funding ought to go to the "subsistence payments" portion, and less to training and staff costs.
- *Project FY 19/20 – ESG-CARES*
Resident believes more funding ought to be allocated to this project because the \$675,621 will not last long with the current economic crisis as a result of the pandemic.
- *Project FY 19/20 – HOPWA-CARES*
Resident believes there should be a significant expansion in the funding amount in order to increase the impact and cover a larger percentage of county residents. Resident stated there should be an expansion of coverage for this category to include more residents who are immunocompromised.

Greensboro Response: The CDBG Housing Rehabilitation budget commitment was made prior to the Coronavirus Aid, Relief, and Economic Security (CARES) Act award considerations. The City of Greensboro will fund public services such as emergency grant payments and shelter operations with CDBG-CV funds. The City of Greensboro received \$675,621 in ESG-CV funds and \$77,708 in HOPWA-CV funds under the CARES Act. All of the available CARES Act funds are allocated to public service projects for the purpose of preventing, preparing for, and responding to Coronavirus.

Comment #5 –

Submitter: Shanna Reece; Executive Director, The Servant Center

Monday May 18, 2020

The Servant Center stated that some homeless service providers that have been supported by the City of Greensboro's CDBG, ESG and local Nussbaum funds received a letter in May 2020 that said: "it is unlikely that we will be able to maintain levels of financial support provided in recent years." The Servant Center commented that it appears from the amendment that the City has \$504,000 in unexpended funds, in addition to regular HUD allocations of ESG and CDBG, Nussbaum funds and millions from the CARES Act. The Servant Center does not understand why homeless service providers who are, and will continue to be, greatly impacted by COVID (increases in expenses, increases in the number of clients, decreases in donations and decreases in volunteers) should have to cut basic services. The Servant Center believes the priority for the City should be to ensure homeless service providers can continue to operate, then provide additional funds to help alleviate the pressure caused by COVID.

Additionally, The Servant Center stated HUD says that "ESG recipients are required to consult with each COC that serves the recipient's jurisdiction to: determine how to allocate ESG funds; develop performance standards for projects and activities assisted with ESG funds..." In addition, HUD requires "in the Annual Action Plan, the jurisdiction must describe its consultation with each COC that serves the jurisdiction in addressing the topic areas above ((91.220(l)(4)(vi); 91.320(k)(3)(v))". The Servant Center does not see anything in the amendment that speaks to how the City will collaborate with the COC regarding ESG funds.

Greensboro Response: City staff consulted with the Continuum of Care (CoC) during the 2019 and 2020 Homelessness Prevention Request for Proposals (RFP) processes for the allocation of CDBG, ESG, and local Nussbaum funding. The consultation is documented in section AP-10 of the 2019-2020 Annual Action Plan and will be documented in section AP-10 of the forthcoming 2020-2021 Annual Action Plan. The City of Greensboro is allocating the full \$2,082,964 of CARES Act funds to public services such as emergency grant payments, rapid rehousing, and shelter operations for the purpose of preventing, preparing for, and responding to Coronavirus. The City will continue to work and partner with community service providers to carry out activities and meet the needs of Greensboro residents.

Comment #6 –

Submitter: Tom Campbell; President & CEO, Family Service of the Piedmont

Monday May 18, 2020

Family Service of the Piedmont (FSP), as the Victim Services provider in Greensboro and Guilford County, would like to encourage that any funding appropriated through the CARES Act include language that recognizes Domestic Violence (DV) Victims as a specific subset of the homeless population. Hotel/motel vouchers and transitional housing funds would be helpful for DV victims, to allow staff to move these individuals/families into non-congregate housing as soon as possible, outside of the eligibility constraints of Rapid Re-Housing. FSP stated that emergency shelters are a vital component of the community's efforts to meet the needs of those experiencing, or at risk of experiencing, homelessness in Guilford County. FSP would also like to urge the City of Greensboro to recognize the challenges that emergency shelters are facing. These challenges include reduced capacity due to social distancing safety measures and costs associated with implementing increased safety precautions for clients and staff within these shelters. Increased expenses include, but are not limited to, locating and purchasing PPE and increased cleaning and staffing costs. FSP does not want emergency shelter capacity or funding reduced.

Greensboro Response: The City of Greensboro is allocating the full \$2,082,964 of CARES Act funds to public services such as emergency grant payments, rapid rehousing, and shelter operations for the purpose of preventing, preparing for, and responding to Coronavirus. The City will continue to work and partner with community service providers to carry out activities and meet the needs of Greensboro residents. The Neighborhood Development Department will strive to include language that recognizes Domestic Violence victims as a specific subset of the homeless population.

Comment #7 –

Submitter: Sarah Roethlinger; Executive Director, Youth Focus

Monday May 18, 2020

Youth Focus requests that the City of Greensboro work the local organizations as well as the Guilford CoC in decisions and wants to understand how these proposed changes affect the services that youth who are experiencing homelessness need. Many decisions regarding homelessness are centered around adults and Youth Focus wants to make sure that youth are being considered in these decisions as well. The approach in helping adults is, and needs to be, different than the approach for helping youth who are experiencing homelessness. Youth Focus relies on this local funding to help bring

federal dollars to the community to keep serving youth and young adults and they don't want to be an interruption to these services as they are a critical resource to our community.

Greensboro Response: City staff consulted with the Continuum of Care (CoC) during the 2019 and 2020 Homelessness Prevention Request for Proposals (RFP) processes for the allocation of CDBG, ESG, and local Nussbaum funding. The consultation is documented in section AP-10 of the 2019-2020 Annual Action Plan and will be documented in section AP-10 of the forthcoming 2020-2021 Annual Action Plan. City staff contacted existing Neighborhood Development-contracted homeless service providers via email on April 28, 2020 regarding the need to allocate the awarded CARES Act funds. The City will continue to work and partner with community service providers to carry out activities and meet the needs of Greensboro residents.

Comment #8 –

Submitter: Jon Lowder; Executive Director, Piedmont Triad Apartment Association

Monday May 18, 2020

The Piedmont Triad Apartment Association (PTAA) urges the city to consider implementing a rental assistance program, using as many CARES Act funding sources as possible. Rental assistance programs are targeted to those who most need it and help ensure that the most vulnerable can remain in their homes. At the same time they help stabilize the local economy because with the rent landlords receive they pay their employees, their service providers who help maintain their properties, their local taxes and their mortgages.

PTAA recommends that any rental assistance program that Greensboro develops be carefully tailored to help those impacted by COVID-19, and in order to do so PTAA recommends the city direct assistance with the following considerations:

1. Tenants must have an existing lease and be in good standing as of the end of March 2020.
2. Have had a documentable and substantial income loss as a result of COVID-19 which will not be adequately/fully subsidized by UI or any other federal, state, or local programs.
3. Initial payments may include up to three months assistance where the eligible household can demonstrate arrears for April and May, with continual inability to make their June payment.
4. Participating landlords have to agree to waive late charges, not proceed with an eviction for those months, and to enter into a payment agreement with the resident for balances beyond the program maximum for those months.
5. Monthly program maximum will be 125% of FMR (or SAFMR's) by unit type.

6. Household family maximum program benefit of \$3000.
7. Pay landlords directly.

PTAA understands that Greensboro is facing many housing-related challenges at this time and they would like to be a resource to the city as it works to address them. PTAA can share best-practices from other cities around the country who are also addressing these issues, and can provide valuable perspectives and expertise from housing providers so that we can reach a solution that is best for all.

Greensboro Response: The City of Greensboro is allocating the full \$2,082,964 of CARES Act funds to public services such as emergency grant payments, rapid rehousing, and shelter operations for the purpose of preventing, preparing for, and responding to Coronavirus. The City will continue to work and partner with community service providers to carry out activities and meet the needs of Greensboro residents.

Comment #9 –

Submitter: Beth McKee-Huger, resident

Monday May 18, 2020

Resident was concerned that the city is not planning to use the CARES Act funds for hotel/motel vouchers or for rental, mortgage, and utility assistance and requested to use a major portion of the CARES Act funding for tenancy preservation.

Greensboro Response: The City of Greensboro is allocating the full \$2,082,964 of CARES Act funds to public services such as emergency grant payments, rapid rehousing, and shelter operations for the purpose of preventing, preparing for, and responding to Coronavirus.