



2020 CONSOLIDATED PLAN ACTION PLAN CARES ACT AMENDMENT NOTICE OF PUBLIC HEARING

WHEN: Thursday, June 18th, 2020 at 1:30 p.m. Virtual hearing at the Policy and Government Oversight Committee meeting

PURPOSE: To receive comment on the City's Proposed CARES Act supplemental funding for Community Development Block Grant and Emergency Solutions Grant.

FOR FURTHER INFORMATION:

http://www.minneapolismn.gov/grants/grants_consolidated-plan

Dear Interested Individual/Agency:

You are invited to comment on Minneapolis' proposed Amendment to the FY 2020 Consolidated Plan Action Plan. The 2020 Action Plan covers the city's use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant Program (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) federal entitlement funding. This amendment will take into account supplemental CDBG and ESG funding (CDBG-CV and ESG-CV) from the federal CARES Act in response to the COVID-19 pandemic. The amendment also modifies the City's Consolidated Plan Citizen Participation Plan for the remainder of the 2020 program year allowing for responsive COVID-19 programming actions. The Citizen Participation Plan additionally outlines current programmatic waivers requested of HUD to implement programming. The amended Citizen Participation Plan follows later in this notice.

We invite your participation by speaking at the hearing and/or submitting written comments before, during, or after the hearing to be held on **June 18th, 2020** before the City Council's Policy and Government Oversight Committee. After the public hearing and the end of the public comment period, the City will submit the 2020 Consolidated Plan Action Plan Amendment.

Listed below are the current supplemental CDBG-CV and ESG-CV funds being provided by the U.S Department of Housing and Urban Development (HUD):

<u>COVID-19 Supplemental Program</u>	<u>Appropriation</u>
CDBG-CV	\$6,642,950
ESG-CV	\$3,349,493

The funding proposals included in the amendment are found in the attached project tables

Written comments may be sent to:

Matt Bower, Manager, Resource Coordination
Finance and Property Services – Office of Grants and Special Projects
Email: Matthew.Bower@Minneapolismn.gov.

Written comments will be accepted during the 5-day public comment period of June 15th, 2020 to June 19th, 2020. Comments will be included in the Amendment submitted to HUD.

The City can provide Amendment materials in alternative formats. For reasonable accommodations or alternative formats please contact Matt Bower.

People who are deaf or hard of hearing can use a relay service to call 311 at 612-673-3000. TTY users call 612-673-2157 or 612-673-2626.

Para asistencia 612-673-2700
Rau kev pab 612-673-2800
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CDBG-CV Health Department Proposals:

Programming Proposal	Description	Proposed Amount
Safety Net Clinic Support	One-time grant for citywide six safety net health clinics revenue replacement	\$300,000
Departmental Emergency Preparedness	Planning/capacity building to do mass dispensing of the COVID vaccine once developed	\$100,000
Community Emergency Preparedness	Build capacity of Emergency Planning Memorandum of Understanding partners	\$55,000
Department COVID-19 Response	Administrative costs related to grant-funded staff time related to COVID-19 Response	\$100,000
PPE For Low-Income Housing Residents	Securing cloth masks for residents of affordable housing developments in the City of Minneapolis	\$115,000

CDBG-CV CPED Department Proposals:

Programming Proposal	Description	Proposed Amount
Emergency Housing Assistance	Short term low-income emergency housing assistance public service provision to supplement Minneapolis Gap Fund for Housing	Up to \$2,000,000
Minneapolis Homeless Response	Property acquisition and/or property conversion/rehab for short- and long-term homeless response	Up to \$4,000,000
Homeownership COVID-19 Support	Expanded foreclosure prevention counseling for low income homeowners through existing contract with Home Ownership Center	\$300,000
Minneapolis Works Program Supplemental	Increase to Minneapolis Works Program for dislocated worker training for populations not able to access existing federal and state programming	\$500,000

ESG-CV Proposals:

Department Name	Programming Proposal	Description	Proposed Amount
Housing	Emergency Shelter	Shelter Capital Development- increase overall shelter capacity in community	\$2,747,555
Housing	Street Outreach	Street Homelessness Response- provision of hygiene, basic needs services to unsheltered persons	\$200,000
Housing	Administration	Administration of ESG-CV	\$334,949
Finance	Homeless Management Information System	Homeless Management Information Systems data entry and reporting management services for compliance purposes delivered by Institute for Community Alliances	\$66,989

Consolidated Plan Citizen Participation Plan [AMENDED]

1. Background

Throughout the development of the Consolidated Plan, resident input is encouraged. City of Minneapolis staff has developed a citizen participation plan designed specifically for the Consolidated Plan. Generally, the City of Minneapolis provides its residents many opportunities to provide input to the decision-making process. Residents are encouraged to attend and participate in City council committee meetings, neighborhood/community revitalization meetings, and numerous boards and public meetings/hearings designed to solicit public comments. These community engagement practices are designed to meet the needs and requirements of various programs and planning processes. Community participation includes the broad resident involvement in neighborhood and community organizations, and supports clearly defined links between the City, City services and neighborhood and community organizations.

As a business planning strategy, City departments commit to a citizen engagement framework that encourages citizen participation for a shared vision. The City provides alternative means of public involvement through its community engagement framework via various community advisory groups, technical assistance, requests for proposals (RFPs) and use of internet communications and community surveys. Participation from the local and regional stakeholders garners broad relationships, and through the broad network of relationships, resources are leveraged whenever possible with new and existing partnerships including federal, private and non-federal public sources.

The federal government and the state are key funding sources for rental and ownership housing projects. Local funds are available for housing and non-housing activities. Primary public entities are the City of Minneapolis department of Community Planning and Economic Development (CPED), the Minneapolis Public Housing Authority (MPHA), Hennepin County, and Minnesota Housing. Nonprofit organizations include developers and community housing development organizations, and advocacy and policy groups including the Family Housing Fund and the Funder's Council. Private sector partners such as local financial institutions, for-profit developers, faith-based organizations and the foundation community continue to be valuable in assisting Minneapolis meet its housing and community development goals and strategies.

City departments directly engage partner agencies and create program strategies that culminate with the Mayor's business planning process and annual budget in coordination with City Council input and deliberation. Additionally, the City informs the Consolidated Plan and its development through the collection of performance data through subrecipient relationships, which provide the necessary feedback for planning and budget-setting priorities. Nothing in the Consolidated Plan, however, shall be construed to restrict the City's responsibility and authority for the development of its application to the HUD and the execution of its Community Development Plan.

A Citizen Participation Schedule is developed for each year's Consolidated Plan at the beginning of the Citizen Participation process and is continually updated.

2. Schedule

FY 2020-24 Consolidated Plan/Action Plan Development Schedule	
November 7, 2019	Public Hearing on City 2020 Proposed Budget & Levy
December 4, 2019	Public Hearing on City 2020 Proposed Budget & Levy
December 11, 2019	2020 Council-Adopted Budget & Public Hearing
March 13-April 11, 2020	Public Comment period 2020-24 Consolidated Plan Action Plan public comment draft
April 8, 2020	Public Hearing on 2020 Consolidated Plan Action Plan
April 15, 2020	Anticipated submission of 2020 Consolidated Plan Action Plan to HUD
June 1, 2020	Start of 2020 Consolidated Plan Program Year
August 2020	Public Comment Period and Public Hearing on 2019 Consolidated Annual Performance Report (CAPER)

3. Public Hearings *(please refer to COVID-19 HUD Mega-Waivers section for alternative compliance in effect)*

The City's citizen participation plan encourages the inclusion of all City residents during the Consolidated Plan development process – especially low-income residents who are the primary clients for HUD programs, organizations advocating for and serving low-income residents and other interested parties. Public meetings and public hearings have been and continue to be the foundation of the citizen participation plan. At least three public hearings are held each year to address housing and community development needs and development of proposed activities, approval of the annual Consolidated Plan and its budget and review of program performance.

The City's Housing Policy and Development Committee holds the public hearings for the Consolidated Plan and the Consolidated Annual Performance Report (CAPER), and the full City Council holds the public hearing and receives comments on the proposed budget during annual budget hearings.

In the case of a declared public health emergency or other challenge and there is concern about significant public health or other risks that may result from holding in person public hearings, the City may be determined it best to undertake a virtual public hearing (alone, or in concert with an in-person hearing) and ensuring that the virtual hearing allows comments and questions in real time, with answers coming directly from the elected representatives or staff to all "attendees". As with an in-person hearing, the City will select a virtual hearing method or platform that provides for accessibility for persons with disabilities and LEP to participate. The City will attempt to comply with HUD citizen participation requirements in all circumstances calling for the need for a virtual public hearing.

4. Notification and Access to Hearings *(please refer to COVID-19 HUD Mega-Waivers section for alternative compliance in effect)*

To assist in obtaining broad-based participation, a Consolidated Plan mailing distribution list of approximately 230 names is used. The list includes public, private and social service agencies and individuals that request notices of meetings and hearings. Information on meetings and hearings is sent using the Consolidated Plan mailing list. Public notices for both public meetings and hearings are published in Finance and Commerce and the City's public website, in accordance with City notification practices. Electronic copies are also available on the City's website at http://www.minneapolismn.gov/grants/grants_consolidated-plan.

Printed notices list locations where copies of the Consolidated Plan are available and invite persons to speak at the public meetings and hearings and/or submit written comments whether in person or in the case of a need for alternative virtual hearings, through email/chat/telephone options as outlined by the City. Public meetings and hearings are accessible and sign language interpretation is available for public hearings and meetings. All Consolidated Plan materials that are subject of the public meeting/hearing can be provided beforehand through the contact information listed under section 10. Access to Records.

The City can provide all Consolidated Plan materials in alternative formats upon request. If you need this material in an alternative format, or if you need disability related accommodations, please contact Matt Bower at (612) 673-2188 or email Matthew.Bower@minneapolismn.gov. Deaf and hard-of-hearing persons may use a relay service to call 311 agents at (612) 673-3000. TTY users may call (612) 673-2157 or (612) 673-2626.

Para asistencia 612-673-2700

Rau kev pab 612-673-2800

Hadii aad Caawimaad u baahantahay 612-673-3500

5. Technical Assistance

A wide range of assistance is available to all groups needing help in understanding the Consolidated Plan application process and development of proposals. This service, as well as referrals to appropriate community agencies, is available from the Office of Grants and Special Projects in City Hall. For technical assistance, call (612) 673-2188.

If a significant number of non-English speaking residents wish to participate in an aspect of the Consolidated Plan citizen participation process, a request for assistance should be made to the City Clerk's Office, or the Office of Grants and Special Projects.

6. Proposed Funding Processes

The City's method for allocating Consolidated Plan funds varies according to the funding source. Further information on funding opportunities can be obtained from the following staff, and is discussed in various sections of this plan (for instance, within project descriptions for programs that have funding solicitations):

<u>Fund</u>	<u>City Awards Funds to:</u>	<u>For Further Information Call:</u>
CDBG	Various Agencies	Matt Bower, IGR – Grants & Special Projects (612) 673-2188
HOME	Project Developers	Carrie Goldberg, CPED (612) 673-5240
ESG	Shelter Rehabilitation/Essential Services Projects, Street Outreach, Homelessness Prevention and Rapid Re-Housing Services	Tiffany Glasper, CPED (612) 673-5221
HOPWA	Public Agencies and Private Non-profits	Matt Bower, IGR – Grants & Special Projects (612) 673-2188

7. Comments/Complaints

If somebody is unable to attend Public Meetings or Hearings for the Consolidated Plan, written comments or relevant data such as articles, reports, studies, or surveys that should be considered in the Consolidated Plan can be sent to the Office of Grants & Special Projects. It is City procedure to respond to written comments or complaints pertaining to the Consolidated Plan within 15 days of receipt. All written comments and the City's response and action taken are included in the Appendix of the subsequent Consolidated Plan and or Annual Performance Report.

8. Anti-Displacement and Relocation Plan

The City of Minneapolis considers existing policies designed to minimize displacement in the CDBG program as the Consolidated Plan is developed. For example, CPED adheres to ongoing administrative policies to limit displacement when implementing CDBG-funded activities. These policies limit displacement by using land inventories, available vacant land and substandard vacant structures. Where displacement does occur, the City provides a full range of relocation benefits and services to those displaced according to its relocation policy. The Consolidated Plan complies with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24. The City follows a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs. The City will provide public notification of specific replacement plans for the demolition of any affected low- and moderate-income housing units to the Minneapolis HUD CPD office. This notification will be done through the course of submitting project proposals to the City Council for their approval with a copy of the petition provided to the local HUD CPD office.

9. Substantial Change Process and Amendments *(please refer to COVID-19 HUD Mega-Waivers section for alternative compliance in effect)*

The City of Minneapolis outlines the following policy regarding formal amendments to its Consolidated Plan.

For purposes of definition, the City of Minneapolis defines “activity” as described in 24 CFR 91.505 as the equivalent of a “program/project” as described in the City’s annual Consolidated Plan budget documents.

The Consolidated Plan will be amended, formally, upon the occurrence of one of the following:

1. A Consolidated Plan activity described in the Consolidated Plan, as amended, is cancelled;
2. A new Consolidated Plan activity not previously described in the Consolidated Plan, as amended, is added; or
3. There is a substantial change to the current Consolidated Plan, as amended. Substantial change is defined as:
 - a) A change in Consolidated Plan priorities
 - b) A change in a program/project description of such a degree that it may be reasonably concluded that a significant change in projected program purpose, scope, location, fund allocation or intended beneficiaries would ensue; or
 - c) A reprogramming of more than 25% of an original CDBG amount budgeted for a major functional Consolidated Plan budget category: Housing, Economic Development, Community Development, Public Services, and Administration.

Formal amendments to the Consolidated Plan trigger the Consolidated Plan citizen participation plan (i.e., need for public hearing before the Housing Policy and Development or other Committee, 30-day public comment period). Changes to the Consolidated Plan not rising to the level of formal amendment will be treated as an informal or minor amendment to the Consolidated Plan through existing City review and approval processes. These informal changes will be included in the annual performance report to HUD and the public for the subject Consolidated Plan year.

10. Access to Records

Current Consolidated Plans are available for review at the Minneapolis Grants and Special Projects Office (Room 307M City Hall, enter at the door for Room 301M), all Public Libraries in Minneapolis, and at the Mid-Minnesota Legal Aid. A limited number of copies of the Consolidated Plan will be available for pickup.

Consolidated Plan information is also placed on the following website link for review http://www.minneapolismn.gov/grants/grants_consolidated-plan. Requests for other records related to the Consolidated Plan can be made by calling the Grants & Special Projects Office. Staff of the Grants & Special Projects Office can also meet with groups or individuals to discuss the Plan. Please call (612) 673-2043 to request information, or to arrange an appointment.

Orders for copies of the Consolidated Plan, comments on the Consolidated Plan process, requests for technical assistance and additions/changes to the mailing list should be sent to Matt Bower, Office of Grants and Special Projects, Room 307M City Hall, 350 South Fifth Street, Minneapolis, MN 55415, or call (612) 673-2188, email matthew.bower@minneapolismn.gov.

11. COVID-19 HUD Mega-Waivers

On March 31, 2020, HUD made a variety of regulatory waivers available to communities to effectively administer their HUD entitlement grant programming due to restrictions and limitations on social interactions to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19. The City has elected to take advantage of several of these waivers which are described below. The time period in effect for each of the listed waivers is described in each waiver. As HUD may make additional or renew existing regulatory waivers available in the future, the City will examine the waiver against its programming operations and update the public through its Consolidated Plan website at http://www.minneapolismn.gov/grants/grants_consolidated-plan.

As of this Amendment, the City has submitted the following waivers to HUD:

Consolidated Planning

To take effect April 13, 2020:

Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Public Comment Period for Consolidated Plan Amendment

Requirement: 30-day Public Comment Period.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Justification: Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

Applicability: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.

Effect: For purposes of any substantial amendment to the 2020 Action Plan or earlier Action Plans, the City will provide for a minimum 5-day public comment period including a public hearing as required before the City Council. This waiver is in effect through May 31, 2021.

Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Reasonable Notice and Opportunity to Comment

Requirement: Reasonable Notice and Opportunity to Comment.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Applicability: This authority is in effect through the end of the 2020 program year.

Effect: For purposes of reasonable notice and opportunity to comment, the City will provide notice of any substantial amendments and its content through the City's website at http://www.minneapolismn.gov/grants/grants_consolidated-plan and/or <https://lms.minneapolismn.gov> for a minimum 5-day public comment period. Records of all substantial amendments will be kept for public review at http://www.minneapolismn.gov/grants/grants_consolidated-plan. This waiver is in effect through May 31, 2021.

Emergency Solutions Grant

To take effect April 8, 2020:

Housing Stability Case Management

Requirement: Program participants receiving homelessness prevention or rapid re-housing assistance must meet with a case manager not less than once per month, unless certain statutory prohibitions apply.

Citation: 24 CFR 576.401(e)

Explanation: Under 24 CFR 576.401(e), the recipients or subrecipients must require program participants to meet with a case manager not less than once per month to assist them in ensuring long-term housing stability, unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.

Justification: Recipients are reporting limited staff capacity as staff members are home for a variety of reasons related to COVID-19 (e.g., quarantining, children home from school, working elsewhere in the community to manage the COVID-19 response). In addition, not all program participants have capacity to meet via phone or internet. 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.

Applicability: This waiver is in effect for two months beginning on the date of the Mega-Waiver memorandum.

Effect: The City has requested this waiver on behalf of its ESG supported housing programming that fall under the case management requirements of the ESG program. The waiver applies to programming through May 31, 2020.

Restriction of Rental Assistance to Units with Rent at or Below FMR

Requirement: Restriction of rental assistance to units with rent at or below FMR.

Citation: 24 CFR 576.106(d)(1)

Explanation: Under 24 CFR 576.106(d)(1), rental assistance cannot be provided unless the total rent is equal to or less than the FMR established by HUD, as provided under 24 CFR Part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

Justification: Quickly moving people into permanent housing is especially critical in preventing the spread of COVID-19. Waiving the limit on rental assistance to rents that are equal to or less than the FMR, established by HUD, will assist recipients and subrecipients in more quickly locating additional units to house individuals and families experiencing homelessness.

Applicability: 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 the date of this memorandum.

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.

Effect: The City has requested this waiver on behalf of its ESG supported rental housing assistance programming to expand the pool of available housing. The waiver applies to programming through September 30, 2020.

To take effect June 12, 2020:

HMIS Lead Activities

Requirement: ESG funds may be used to pay the costs of managing and operating the HMIS, provided that the ESG recipient is the HMIS Lead.

Citation: 24 CFR 576.107(a)(2)

Explanation: To enable ESG-funded projects to participate in HMIS as required by section 416(f) of the McKinney-Vento Homeless Assistance Act, 24 CFR 576.107(a)(2) authorizes the use of ESG funds for managing and operating the HMIS (e.g., hosting and maintaining HMIS software or data, upgrading, customizing, and enhancing the HMIS), only where the ESG recipient is the HMIS Lead, as designated by the CoC.

Justification: Waiving the rule as specified below would allow more recipients to use ESG funding to upgrade or enhance the HMIS as needed to incorporate ESG program data related to COVID-19.

Applicability: 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 the date of this memorandum.

Effect: The City has recognized a request from the state HMIS systems administrator of a need for additional funding to customize the HMIS system to permit for COVID-19 related programming reporting requirements. This waiver will allow the City to contribute ESG-CV funds to HMIS systems administration. The waiver applies through September 30, 2020.

Housing Opportunities for Persons with AIDS

To take effect April 6, 2020

Self-Certification of Income and Credible Information on HIV Status

Requirement: Source Documentation for Income and HIV Status Determinations.

Citation: 24 CFR 574.530, Recordkeeping

Explanation: Each grantee must maintain records to document compliance with HOPWA requirements, which includes determining the eligibility of a family to receive HOPWA assistance.

Justification: This waiver will permit HOPWA grantees and project sponsors to rely upon a family member's self-certification of income and credible information on their HIV status (such as knowledge of their HIV-related medical care) in lieu of source documentation to determine eligibility for HOPWA assistance of families and grantees affected by COVID-19.

Applicability: Eligibility is restricted to a low-income person who is living with HIV/AIDS and the family of such person. This waiver is in effect for recipients who require written certification of the household seeking assistance of their HIV status and income, and agree to obtain source documentation of HIV status and income eligibility within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19.

Effect: The City has requested this waiver on behalf of its HOPWA subrecipient project sponsors to facilitate ease of eligibility determinations in light of local public health recommended social distancing practices.

FMR Rent Standard

Requirement: Rent Standard for Tenant-Based Rental Assistance (TBRA).

Citation: 24 CFR 574.320(a)(2), Rent Standard

Explanation: Grantees must establish rent standards for their tenant-based rental assistance programs based on FMR (Fair Market Rent) or the HUD approved community-wide exception rent for unit size. Generally, the TBRA payment may not exceed the difference between the rent standard and 30 percent of the family's adjusted income.

Justification: This waiver of the FMR rent standard limit permits HOPWA grantees to establish rent standards, by unit size, that are reasonable, and based upon rents being charged for comparable unassisted units in the area, taking into account the location, size, type, quality, amenities, facilities, management and maintenance of each unit. Grantees, however, are required to ensure the reasonableness of rent charged for a unit in accordance with §574.320(a)(3). This waiver is required to expedite efforts to identify suitable housing units for rent to HOPWA beneficiaries and HOPWA-eligible families that have been affected by COVID-19, and to provide assistance to families that must rent units at rates that exceed the HOPWA grantee's normal rent standard as calculated in accordance with §574.320(a)(2).

Applicability: Such rent standards may be used for up to one year beginning on the date of this memorandum.

Effect: The City has requested this waiver on behalf of its subrecipient project sponsors that provide HOPWA rental housing assistance programming in order to expand the pool of available housing that can still meet rent reasonableness. The waiver applies to programming through March 31, 2021.

Property Standards for TBRA

Requirement: Property Standards for Tenant-Based Rental Assistance (TBRA)

Citation: 24 CFR 574.310(b), Housing Quality Standards

Explanation: This section of the HOPWA regulations provides that units occupied by recipients of HOPWA TBRA meet the Housing Quality Standards (HQS) established in this section.

Justification: This waiver is required to enable grantees and project sponsors to expeditiously meet the critical housing needs of the many eligible families that have been affected by COVID-19 while also minimizing the spread of the coronavirus.

Applicability: This waiver is in effect for one year beginning on the date of this memorandum for recipients and project sponsors that are able to meet the following criteria:

- a. The recipient or project sponsor is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided; and
- b. The recipient or subrecipient has written policies to physically reinspect the unit after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.

Effect: The City has requested this waiver on behalf of its HOPWA rental housing assistance programming to expand the pool of available housing that can still meet rent reasonableness. The waiver applies to programming through March 31, 2021.

Space and Security

Requirement: Adequate Space and Security.

Citation: 24 CFR 574.310(b)(2)(iii), Space and security

Explanation: This section of the HOPWA regulations provide that each resident must be afforded adequate space and security for themselves and their belongings.

Justification: This waiver is required to enable grantees and project sponsors operating housing facilities and shared housing arrangements the flexibility to use optional appropriate spaces for quarantine services of eligible households affected by COVID-19. Optional spaces may include the placement of families in a hotel/motel room where family members may be required to utilize the same space not allowing for adequate space and security for themselves and their belongings.

Applicability: This space and security requirement is waived for grantees addressing appropriate quarantine space for affected eligible households during the allotted quarantined time frame recommended by local health care professionals.

Effect: The City has requested this waiver on behalf of its HOPWA subrecipient project sponsors that operate HOPWA-funded housing facilities to accommodate any required quarantine of eligible households due to COVID-19 health protocols. This waiver is in effect for the duration of any local public health emergency called for COVID-19.