

Coordinated Investment Planning for Rental Assistance

Housing is Healthcare

May 26, 2020



The Florida Housing Coalition

- Statewide nonprofit provider of training, technical assistance, and consulting
- From ending homelessness to first time homeownership
- See www.flhousing.org



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Thank you.



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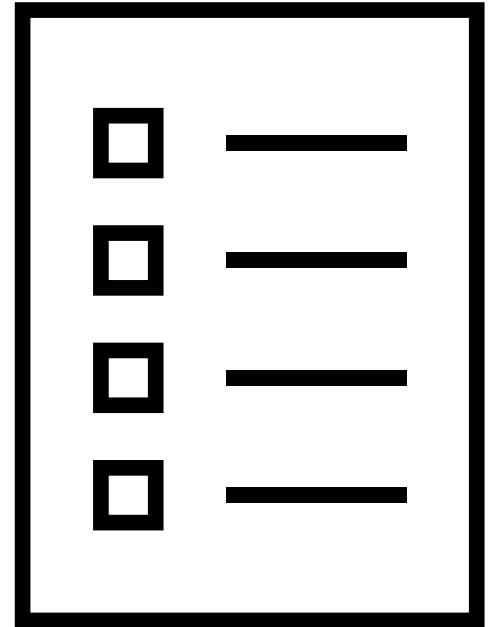


Webinar Logistics

- Participants are muted
- Enter your questions in the box in your webinar panel
- Handouts are available with this webinar
- This PPT is included as a handout
- This webinar is being recorded and will be available on our [COVID-19 Resource Page](#) along with the attached handouts and all the questions and answers
- A survey will immediately follow the webinar; *please* complete it! Thanks!



Your role?





Where are you now?

Agenda

1. Introduction
2. CARES Act, briefly
3. Creating a Coordinated Investment Plan (CIP) for rental assistance
 1. Overview of CIP process
 2. Goal-setting and identifying needs
 3. Estimating costs
 4. Inventorying resources
 - A special focus on using HOME and CDBG for rental assistance
 5. Weaving it all together
4. Q&A and summary

CARES Act, briefly



Purpose

CARES Act funding is to be used “**to prevent, prepare for, and respond to coronavirus.**”

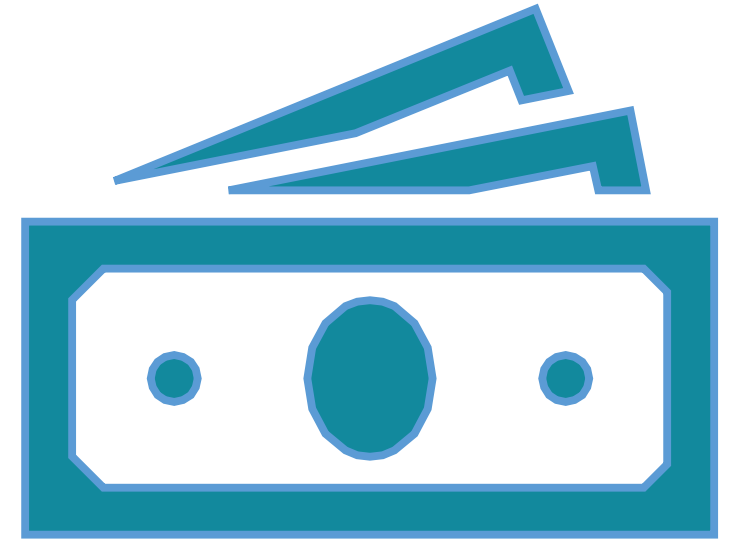
HUD, during Office Hours and on webinars, has indicated that HUD is interpreting the language broadly. Written guidance is yet to come.

But don't forget you have to make the connection!



Selected CARES Act Resources

- ESG – \$4B
- CDBG – \$5B
- CSBG – \$1B
- LIHEAP – \$900M
- CRF – \$150B



Overview of Coordinated Investment Planning (CIP): Purpose and Process



Purpose of CIP

Strategically align resources to “prevent, prepare for, and respond to coronavirus” by:

- (1) creating permanent housing solutions for households experiencing homelessness, and
- (2) preventing eviction and homelessness for those in stable housing who are at risk of severe COVID symptoms and/or affected by COVID.

CIP Process

1. Convening a planning group or otherwise engaging relevant stakeholders
2. Goal-setting and identifying needs
3. Estimating costs
4. Inventorying resources
5. Weaving it all together

1. Planning Group / Stakeholder Engagement

- Local government(s) – may be multiple jurisdictions and/or multiple departments within a jurisdiction
- Homeless Continuum of Care (CoC)
- Philanthropy
- People representing subpopulations disproportionately affected by homelessness, poverty, and/or COVID
- People with lived experience of homelessness or poverty
- Who else?

2. Setting Goals and Identifying Needs

- Start with the data
 - CoC Point in Time Count
 - CoC By-Name or Prioritization List
 - Low-income renter households identified as having a disability or chronic health condition
 - Low-income renter households with members age 65 or older
 - COVID impact measures (e.g., [Shimberg's COVID Housing and Workforce Indicators](#))
- Start from a people-centered perspective, not a money-centered perspective
- Identify priority or target subpopulations
- Set the goals based on the data

Who should be prioritized for rent assistance, *especially* with CARES Act funding?

- People experiencing **homelessness***
- Low-income **people at high risk** of developing severe COVID-19 symptoms (see next page)

*CoCs should prioritize with simple criteria

- **Less sophistication for quicker housing**



People at high risk for severe COVID

(per CDC)

- People over 65
- People living in a nursing home or long-term care facility
- People of all ages with underlying medical conditions, including:
 - Chronic lung disease or moderate to severe asthma
 - Serious heart conditions
 - Severe obesity (body mass index [BMI] of 40 or higher)
 - Diabetes
 - Chronic kidney disease undergoing dialysis
 - Liver disease
 - People who are immunocompromised

HUD Suggestion (offered during a HUD Office Hour)

1. Start housing people in (1) unsheltered locations, and (2) congregate shelters and transitional housing
2. If you have non-congregate shelter, start housing people as they exit so they don't return to unsheltered or congregate settings
3. Next, provide assistance to prevent homelessness among those who are at the highest risk of severe COVID (see previous page)

GOALS		
Housing Goals	Household (HH) Type	Number of HH
Rapidly re-house 300 households	Single Adults (non-Veteran, not chronic)	165
	Families (non-Veteran, not chronic)	55
	Youth 18-24	15
	Single Adults (non-Veteran, chronic)	40
	Families (non-Veteran, chronic)	25
		300
Prevent 200 households from becoming homeless, using rental assistance	Single Adults (non-Veteran)	75
	Families (non-Veteran, not chronic)	100
	Youth 18-24	25
		200
		500

Example of Goals and Needs

3. Estimating Costs

- Start with existing data from existing rental assistance programs (e.g., CoC/ESG Rent Assistance, HOME TBRA, SHIP Rent Assistance)
- Build in more months of assistance and/or higher levels of assistance if your economy is especially hard hit or if there are identifiable segments of the targeted population that are especially hard hit

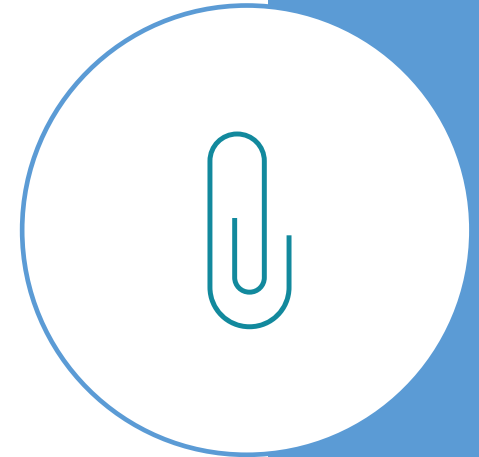
Example of Cost Estimation

GOALS		COSTS												SUBTOTAL PROJECT COSTS	Admin	Total Project Cost per HH	TOTAL COSTS ALL HH
Housing Goals	Household (HH) Type	Number of HH	Staffing			Rent Assistance			Other Costs			Average cost per household	% of subtotal of costs				
			Monthly staff costs (Salary & Benefits)	Monthly caseload	Monthly Per Household [Divided by caseload ratio]	Average months of assistance	Staffing cost per household	Average months of assistance	Average monthly housing cost	Housing cost per household	Type of cost						
Rapidly re-house 300 households	Single Adults (non-Veteran, not chronic)	165	\$ 7,000	25	\$ 280	6	\$ 1,680	6	\$ 950	\$ 5,700	Household items, move-in costs	\$ 2,000	\$ 9,380	7%	\$ 10,037	\$ 1,656,039	
	Families (non-Veteran, not chronic)	55	\$ 7,000	25	\$ 280	6	\$ 1,680	6	\$ 1,200	\$ 7,200	Household items, move-in costs	\$ 3,000	\$ 11,880	7%	\$ 12,712	\$ 699,138	
	Youth 18-24	15	\$ 7,000	20	\$ 350	6	\$ 2,100	6	\$ 950	\$ 5,700	Household items, move-in costs	\$ 2,000	\$ 9,800	7%	\$ 10,486	\$ 157,290	
	Single Adults (non-Veteran, chronic)	40	\$ 7,000	20	\$ 350	12	\$ 4,200	12	\$ 950	\$ 11,400	Household items, move-in costs	\$ 2,000	\$ 17,600	7%	\$ 18,832	\$ 753,280	
	Families (non-Veteran, chronic)	25	\$ 7,000	20	\$ 350	12	\$ 4,200	12	\$ 1,200	\$ 14,400	Household items, move-in costs	\$ 3,000	\$ 21,600	7%	\$ 23,112	\$ 577,800	
		300															\$ 3,843,547
Prevent 200 households from becoming homeless, using rental assistance	Single Adults (non-Veteran)	75	\$ 7,000	50	\$ 140	3	\$ 420	3	\$ 1,000	\$ 3,000		\$ -	\$ 3,420	7%	\$ 3,659	\$ 274,455	
	Families (non-Veteran, not chronic)	100	\$ 7,000	50	\$ 140	3	\$ 420	3	\$ 1,400	\$ 4,200		\$ -	\$ 4,620	7%	\$ 4,943	\$ 494,340	
	Youth 18-24	25	\$ 7,000	25	\$ 280	3	\$ 840	3	\$ 950	\$ 2,850		\$ -	\$ 3,690		\$ 3,690	\$ 92,250	
		200															\$ 861,045
		500															\$ 4,704,592



4. Inventorying Resources

See Rent Assistance Table
handout

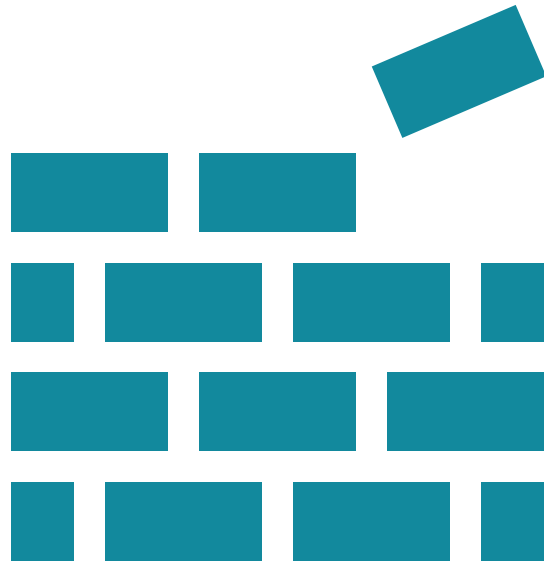


Rent Assistance Table (partial)

Program (Source)	Program abbrev.	Local administrator	Type of assistance (1)	Income eligibility	Length of financial rent assistance	Additional criteria
Community Development Block Grant (HUD)	CDBG	Local government	HP, RRH	<80% AMI	Up to 3 months	
CARES Act Community Development Block Grant (HUD)	CDBG-CV	Local government	HP, RRH	<80% AMI	Up to 3 months	
HOME Investments Partnership Program (HUD)	HOME	Local government	HP, RRH	<80% AMI max but most often <60% AMI	Up to 24 months (renewable)	
Emergency Solutions Grant (HUD)	ESG	Local government; Homeless continuum of Care (CoC)	HP, RRH	None for RRH; <30% AMI for HP	Up to 24 months for HP, RRH	Only households experiencing homelessness or at risk of homelessness
CARES Act Emergency Solutions Grant (HUD)	ESG-CV	Local government; CoCs	HP, RRH	None for RRH; <50% AMI for HP	Up to 24 months for HP, RRH	Only households experiencing homelessness or at risk of homelessness
Continuum of Care (HUD)	CoC	CoC	RRH, PSH	None	Up to 24 months for RRH; indefinite for PSH	Only households experiencing homelessness
Housing Opportunities for Persons with AIDS (HUD)	HOPWA	Local government; nonprofit providers	HP, RRH, PSH	<80% AMI	Up to 21 weeks in a 52-week period for STRMU; ongoing for TBRA and PSH	Only households HIV+
CARES Act Housing Opportunities for Persons with AIDS (HUD)	HOPWA-CV	Local government; nonprofit providers	HP, RRH	<80% AMI	Up to 24 months	Only households HIV+

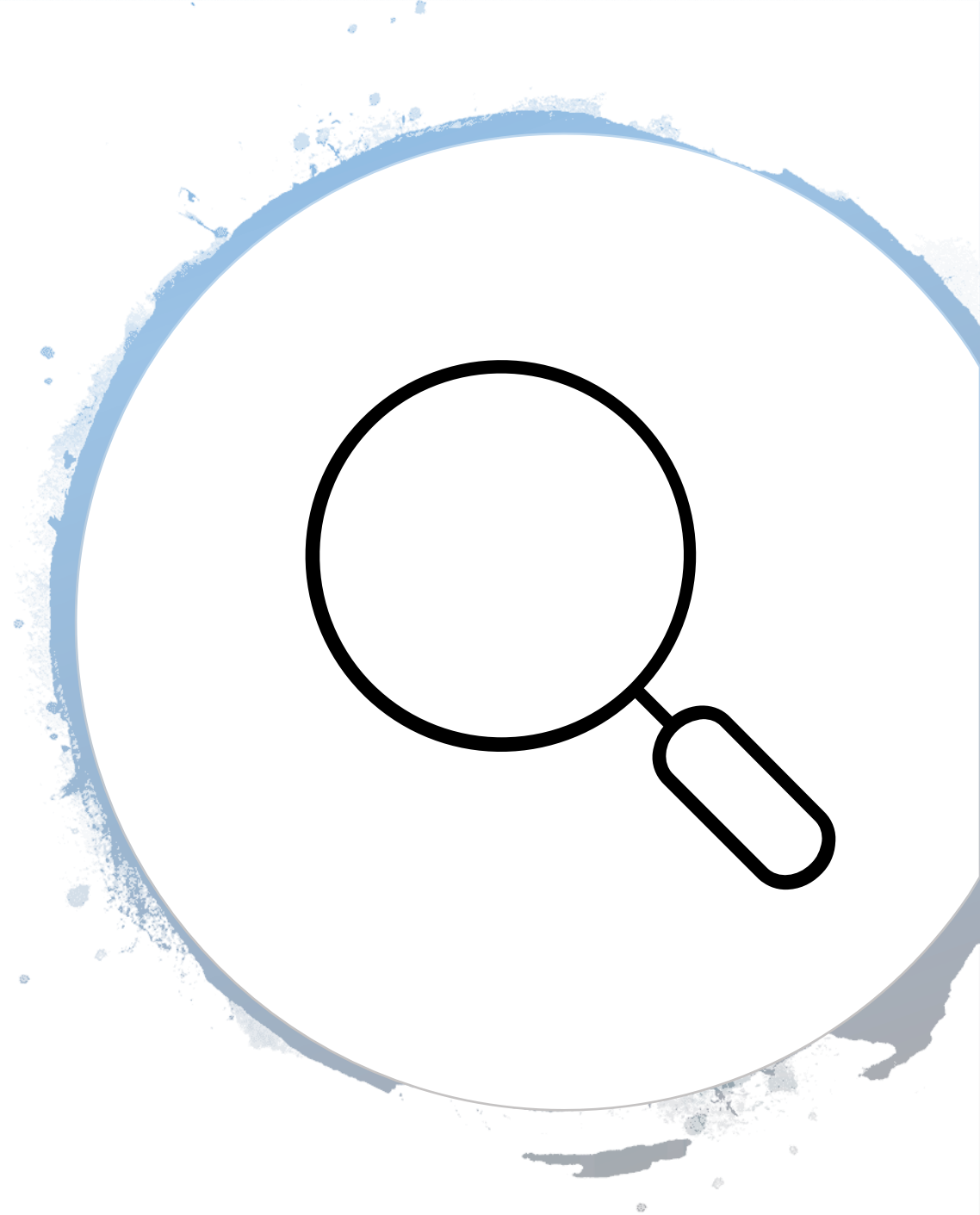


Important reminder about barriers: ESG-CV



ESG program assistance cannot be conditioned upon participation in services or classes, complying with work requirements, etc. or meeting conditions such as sobriety, medication compliance, etc., either before or after entry into the program.

**Special focus:
Using CDBG and HOME
and rental assistance**



CDBG-CV Funding Overview

- \$2 billion allocated directly to states, local, and territorial governments through the regular program formula:
https://www.hud.gov/program_offices/comm_planning/budget/fy20/
- \$1 billion allocated directly to states based on need according to a new formula developed by HUD
 - Florida - \$63.2M
- \$2 billion to be allocated to states and local governments based on a new formula and made on a rolling basis



HUD Requirements for Using CDBG-CV for Rental Assistance

- Every activity funded with CDBG must be eligible and meet a national objective
- CDBG-CV activities must also prevent, prepare for, and respond to COVID-19
- Not going to find “Rental Assistance” as a CDBG Eligible Activity in regulations
- However, CDBG can be used for this purpose



Eligible Activity: Subsistence Payments

- ***Income payments.*** The general rule is that CDBG funds may not be used for income payments. For purposes of the CDBG program, “income payments” means **a series of subsistence-type grant payments made to an individual or family for items such as food, clothing, housing (rent or mortgage), or utilities**, but **excludes** emergency grant payments made over a period of **up to three consecutive months to the provider of such items or services** on behalf of an individual or family

- 24 CFR 570.207(b)(4)



Eligibility and National Objective

- **Eligibility:** Public Service
 - Good news! CARES Act eliminated the 15% cap on public services activities (also applies to FY19 and FY 20 grants)
- **National Objective:** Can meet all three national objectives
 - Most common – Low/Mod Limited Clientele Benefit
 - Can you use urgent need ?
 - Considerations – 70% overall benefit standard



Other Eligibility/IDIS Setup Considerations

- Matrix Code – 05Q Subsistence Payments
- Goal Outcome Indicator (GOI)
 - Considered homelessness prevention – utility payments to prevent cutoff or rent/mortgage payments to prevent eviction

Program Design Considerations

- **Eligible Applicants**

- Households with incomes at or below 80% AMI
- Household economically impacted as a result of COVID-19 (job loss, reduction in hours or pay, furlough)

- **Type of Assistance**

- Not to exceed three (3) months
- Paid directly to vendor
- Amount of assistance – determined by grantee
- Rent current prior to COVID

- **Application and Documentation to be submitted by applicant**

- Household information
- Income and asset documentation
- Copy of lease or mortgage statement
- Landlord, Mortgage Provider, or Utility Provider information



HUD Requirements for Using HOME for Rental Assistance

- No supplemental HUD funding under CARES Act
 - Have to amend Action Plan to reprogram funds to TBRA
- Tenant Based-Rental Assistance (TBRA) is an eligible HOME activity
 - Rent, security deposits
 - Utility deposits provided in conjunction with a TBRA security deposit or monthly rental assistance program
- HOME rental assistance is usually long-term (up to 24 months; renewable)



HOME TBRA Suspensions and Waivers

- HUD waivers allow HOME TBRA to be used for emergency and short-term assistance in response to COVID-19 to:
 - Provide immediate rental assistance to individuals and families seeking housing
 - Assist households that have housing and face reduced or lost wages
 - Assist existing TBRA families that need additional assistance due to reduced or lost wages

Summary of HOME TBRA Waivers (Effective April 10, 2020 – December 31, 2020)

- Con Plan Market Analysis and Certification
- Written Tenant Selection Criteria
- Rent Reasonableness
- Maximum TBRA subsidy and utility costs
- No need to establish utility allowance for different unit types/sizes
- Rental assistance contract does not need to begin on first day of the term of the lease
- Existing leases do not need to be amended (except for VAWA requirements)
- Initial HQS inspection not required during waiver period
- Annual HQS inspections not required during waiver period
- Self-certification of income permitted

These things are required!!

- Must document criteria for selecting individuals and families to be assisted during pandemic
- Must execute a rental assistance contract with the owner or tenant for a period not to exceed December 31, 2020
- Use a lease addendum that includes Violence Against Women Act (VAWA) requirements
- LBP requirements still apply to units built before 1978
- Establish procedures to minimize the risk that tenants are in housing that does not meet HQS
- Procedures for conducting physical inspections within 120 days following the end of the Dec. 31, 2020 waiver period



Avoiding Duplication of Benefits (DOB)

- DOB occurs when funding is provided for the same costs paid by any other source
- Be careful when designing program guidelines
- Be aware of other resources available in your community for rental assistance
- Establish policies and procedures to prevent the duplication of benefits
- **NEED ADDITIONAL GUIDANCE FROM HUD**





5. Weaving

Use of Funds to Meet Goals and Estimated Costs

Source of Rental Assistance	Amount Available	Timeframe for Expenditures	Rapid Re-Housing	Eviction/ Homelessness Prevention
ESG (Direct)	\$ 300,000		\$ 300,000	
ESG (DCF)	\$ 200,000	6/30/2021	\$ 200,000	
ESG-CV1 (Direct)	\$ 750,000		\$ 750,000	
ESG-CV1 (DCF)	\$ 500,000	6/30/2022	\$ 500,000	
SHIP	\$ 300,000			\$ 300,000
CDBG	\$ 100,000			\$ 100,000
CDBG-CV1	\$ 200,000			\$ 200,000
HOME	\$ 250,000		\$ 250,000	
CoC	\$ 400,000		\$ 400,000	
Challenge	\$ 150,000	6/30/2021	\$ 150,000	
CRF	\$ 1,000,000	12/30/2020	\$ 500,000	\$ 500,000
Philanthropy	\$ 850,000		\$ 850,000	
	<u>\$ 5,000,000</u>		<u>\$ 3,900,000</u>	<u>\$ 1,100,000</u>





HUD: More Waivers and Guidance On the Way!

- <https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-news-and-announcements>



Upcoming Trainings/Webinars

1. Preparing for the SHIP Monitor: Part 2
 - May 26, 2:00-3:30 (ET)
2. Preparing for the SHIP Monitor: Part 3
 - May 27, 2:00-3:30 (ET)
3. COVID-19 Response for Housing and Homelessness in Florida
 - May 28, 1:00-2:30 (ET)
4. Affordable Housing Funding Sources – Part 1
 - June 2, 2:00-3:30 (ET)

Register at our training calendar site: <https://www.flhousing.org/events/>



Previous Webinars to Note

1. COVID-19 SHIP Rent Assistance Implementation
2. COVID-19 SHIP Mortgage Assistance Implementation
3. Implementing Effective Rental Assistance Programs with Federal and State Resources
4. Assisting Homeless and Special Needs Households through COVID-19
5. Weekly COVID-19 webinars on homelessness and housing in Florida

Webinar recordings, PPT, and handouts available at:

<https://www.flhousing.org/covid-19-webinars-and-digests/>



Thank you.



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Contact Us



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