

Seminole County Substantial Amendment- COVID-19 Response

The following is a summary and draft language that amends the 2015-2019 Consolidated Plan and 2019/2020 Annual Action Plan (Amendment #2.)

Background

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, was signed, providing \$5 billion for CDBG to rapidly respond to COVID-19 and the economic and housing impacts caused by this unprecedented crisis. The Act also provided \$4 billion for the ESG to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

The Seminole County 2015-2019 Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership program for the period between program years 2015 and 2019. The Annual Action Plan details each year within the 5-year Consolidated Plan and outlines the implementation of annual funding. Each plan is developed through public input, analyses, and planning.

The County's Citizen Participation Plan describes the efforts Seminole County will take to encourage residents to participate in developing these plans. It also provides requirements for public process when a "substantial amendment" to the Annual Action Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the citizen participation plan:

- Increases or decreases by or 50% change in the amount allocated to a category of funding
- A significant change to an activity's proposed purpose, scope, location or beneficiaries or persons served
- Funding of a new activity not previously described in the Action Plan.

Due to COVID-19, the United States Department of Housing and Urban Development (HUD) issued guidance waving the Citizen Participation Plan requirements for entitlement recipients, provided (1) no fewer than five days are provided for public comment and (2) reasonable notice and the opportunity to comment is given.

Additionally, HUD awarded supplemental funding through the CARES Act that requires programming in the 2019-2020 Annual Action Plan. Substantial amendments are necessary to program the supplemental funding and reallocate FY 2019-2020 CDBG funds for additional public services to respond to COVID-19.

Proposed Substantial Amendments

The proposed amendments are as follows:

1. Programming \$ 1,238,297 in CDBG Funds made available by the CARES Act
2. Programming \$ 591,952 in ESG Funds made available by the CARES Act
3. Reallocation of \$ 224,000 in of FY 2019/2020 CDBG for public services for Covid-19 response

CDBG-CV - \$1,238,297

CDBG- CV Funds may be used for Economic Development activities to:

- Prevent job loss for low and moderate income workers
- Stabilize micro-businesses that provide medical, food delivery, cleaning, and other services to support home health and quarantine
- Expand employment opportunities for low and moderate income workers through manufacturing of medical supplies for infectious disease response
- Grant Administration/Planning

ESG-CV - \$ 591,952

ESG-CV Funds may be used for:

- Shelter Operations- Maintaining a sanitary shelter environment will help to keep staff and participants healthy
- Street Outreach-Materials to assist unsheltered homeless
- Rapid-Rehousing- Rapid- Rehousing assistance
- HMIS/Data Collection
- Grant Administration
- Homeless Prevention

Re-allocation of FY 2019/2020 CDBG- \$224,000

The FY 2019/2020 Acquisition, Rehabilitation, Rental Strategy will be cancelled and funds reallocated for the Covid-19 response.

- Funds will be used for public services to low income individuals or households in response to Covid-19.

Public Review and Comments

The proposed plan changes were available for public review and comment from May 1, 2020, to May 8, 2020, in accordance with the expedited public comment process permitted by HUD for the COVID-19 response. A summary of the substantial amendment and meeting notice was published in the Orlando Sentinel and posted on the Community Services website. The substantial amendments will be presented to the Seminole County Board of County Commissioners for

approval on May 12, 2020, at their Regular Board Meeting. Any comments received will be included with the submittal of the substantial amendment.

Recommendation

Staff recommends approval of the substantial amendments to the 2015-2019 Consolidated Plan and 2019/2020 Action Plan (Amendment #2) necessary for the COVID-19 response. Authorize the Chairman to execute corresponding documents, signature pages, SF-424 and SF424-D, certifications, subsequent Grant Agreements with the US Department of Housing and Urban Development (HUD). Authorize Community Services Staff to submit the substantial amendments to HUD for approval.