



Department of Housing and Neighborhood Programs

HUD Consolidated Plan 2016-2020 Consolidated Plan Amendment FY 2020 Amendment Citizen Participation Plan

- **2016-2020 Consolidated Plan Amendment-Cares Act CDBG Allocation \$879,049**
- **2016-2020 Consolidated Plan Amendment-Cares Act HOPWA Allocation \$81,216**
- **2016-2020 Consolidated Plan Amendment-HUD Waivers**
- **FY 2020 Annual Action Plan Amendment-Priority Need-CDBG Activities for COVID-19**
- **FY 2020 Annual Action Plan Amendment-Priority Need-HOPWA Activities for COVID-19**
- **FY 2020 Annual Action Plan Amendment-Priority Need-CHDO Set-Aside (reallocate)**
- **FY 2020 Annual Action Plan Amendment-Priority Need-HOME TBRA (addition)**
- **Citizen Participation Plan-Revised**

(Public Comment Period April 20, 2020 – April 24, 2020)

INTRODUCTION

This document is a substantial amendment to the City of Little Rock' FY2016-2020 Consolidated Plan, FY2020 Annual Action Plan, and Citizen Participation Plan based on Coronavirus Aid, Relief, and Economic Security Act (CARES Act)(Public Law No.116-136) for Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Housing Opportunities for Persons With AIDS (HOPWA).

Title 24 Section 91.505 of the Code of Federal Regulations stipulates the participating jurisdictions shall amend their approved plans whenever they make the following decisions:

1. To make a change in its allocation priorities or a substantial change in the method of distribution of funds.
2. To carry out a new activity using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan.
3. To substantially change the purpose, scope, location, or beneficiaries of an activity.

This regulation further requires that jurisdictions identify in their citizen participation plans the criteria that they will use for determining what constitutes a substantial amendment.

Consistent with these requirements, the City of Little Rock Citizen Participation Plan, states that substantial amendments to the Consolidated Plan or Annual Action Plan are required when the City of Little Rock Community Development Division wishes to make one of the following changes:

1. A proposed new activity which cannot reasonably be construed to have been included within the programmatic intent of the adopted application or in the commitment of funds to a specific project; or
2. An activity that was identified in the adopted application, but which subsequently is proposed to be deleted; or
3. An activity that is proposed to be altered in terms of its purpose, scope, location, or beneficiaries to such an extent that it can no longer reasonably be construed as the activity reviewed by the public and approved by the Consolidated Plan Advisory Committee.
4. The criteria to be used in determining if an activity is at risk of becoming substantially changed from its originally intended purpose will be based upon further Consolidated Plan Advisory Committee actions to modify/amend the Consolidated Plan proposed activities.

5. City staff shall proactively monitor each funded project for compliance with its respective performance criteria and provide periodic progress reports to the Consolidated Plan Advisory Committee.
6. Any activity that is judged to be at risk of substantially changing from its originally intended propose, scope, location, or beneficiaries will be reviewed in a public hearing forum prior to a decision by the Consolidated Advisory Plan Committee as to whether the performance objectives of the project shall be amended.
7. An application for a CDBG Section 108 Loan Guarantee.

The proposed change is to carry out the following activities not previously described in the Consolidated Plan and the Annual Action Plan:

- Tenant Based Rental Assistance (HOME)

For CDBG, HOME, and HOPWA funding under, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice/comment period of proposed changes beginning April 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed.

PROPOSED AMENDED SECTION

I. 2016-2020 CONSOLIDATED PLAN – STRATEGIC PLAN

The proposed substantial amendment will amend the Strategic Plan of the 2016-2020 Consolidated Plan in the following sections:

A. SP-25 Priority Needs

- a. Add Tenant Based Rental Assistance will provide rental assistance to low-moderate income households affected by COVID-19 for a limited time.

B. SP-35 Anticipated Resources

- a. Add \$879,049 in CDBG supplemental allocation made available through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for activities to prevent the spread COVID-19 and mitigate economic impacts caused by COVID-19.
- b. Add \$81,216 in HOPWA supplemental allocation made available through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for activities to prevent the spread COVID-19 and mitigate economic impacts caused by COVID-19.

C. SP-45 Goals

- a. Add 2.6 DH Rental Housing Assistance-provide housing assistance to enable low-moderate income households for a limited time to remain in their homes and reduce their risk of homelessness.
- b. Add 1.6 SL Other Special Needs for Emergency-provision of equipment, supplies, and materials to carry out public services.

II. 2020 ANNUAL ACTION PLAN

The proposed substantial amendment will amend the 2020 Annual Action Plan in the following sections:

B. AP-15 Expected Resources

- a. Include CDBG supplemental allocation of \$879,049 for eligible activities that will prevent the spread of COVID-19 and mitigate the economic impacts of COVID-19 such as health services, delivery meal programs, equipment, supplies, and materials to carry out public services, business assistance to retain employees, and administration.
- b. Include HOPWA supplemental allocation of \$81,216 for administration, supportive services, and Short-Term Rental, Mortgage, and Utility Assistance (STRMU).

C. AP-20 Annual Goals and Objectives

- a. Add 2.6 DH Rental Housing Assistance-provide housing assistance to enable low-moderate income households for a limited time to remain in their homes and reduce their risk of homelessness.
- b. Add 1.6 SL Other Special Needs for Emergency-provision of equipment, supplies, and materials to carry out public services.

D. AP-35 Projects & AP-38 Project Summary

- a. Add CDBG Assistance (COVID-19)-Eligible CDBG activities include, but are not limited to, assisting low-and moderate income households with health services, delivery meal programs, equipment, supplies, and materials to carry out public service, business assistance to retain employees, and support of other COVID-19 response services. City anticipates up to 20% for administration; up to 25% for public services; and up to 55% for economic business assistance.
- b. Add HOME Rental Assistance (COVID-19)-Eligible HOME activities are Tenant Based Rental Assistance for low-and moderate income households with rental assistance for a limited time (15%), and increase administrative

funds from 10% up to 25% percent for FY 2020 allocation and program income.

- c. Add HOPWA Assistance (COVID-19)-Eligible HOPWA activities include administration, supportive services, and Short-Term Rental, Mortgage, and Utility Assistance (STRMU). City anticipates 10% for administration, and the remaining 90% for supportive services and STRMU.
 - d. Reallocate CHDO Set-aside (15%) for Tenant Based Rental Assistance.
- E. AP-55 Affordable Housing
- a. Increase 1-year goals for the number of households to be supported for non-homeless by 50.
 - b. Increase 1-year goals for the number of households to be supported for rental assistance by 50.
 - c. Update the narrative in the discussion section to reflect HOME Tenant Based Rental Assistance
- F. AP-70 HOPWA Goals
- a. Increase 1-year goals for the number of households to be provided through the use of HOPWA for Short-term rent, mortgage, and Utility Assistance by 50.

III. CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan was revised to include the Coronavirus Aid, Relief, and Economic Security (CARES Act) supplemental allocation of CDBG and HOPWA funds. Another revision based on HUD waivers to expedite actions to response to COVID-19. The minimum 30-day comment period, reasonable notice and opportunity to comment was waived for substantial amendment provided that no less than 5 days are provided for public comment on each substantial amendment. A section concerning activities exempt from substantial amendment citizen participation requirements due to urgent needs was added.

IV. PUBLIC NOTICE

Notice of the proposed substantial amendment will be published in the Arkansas Democrat-Gazette on April 19, 2020. The 5-day comment period will be April 20, 2020-April 24, 2020. Written comments should be sent on or before April 24, 2020 to the following:

City of Little Rock
Department of Housing and Neighborhood Programs
Community Development
Doris Turner
500 West Markham, Suite 120W
Little Rock, AR 72201

The Board of Directors of the City of Little Rock will approve the substantial amendment due to CARES Act at the Board's agenda meeting in the Robinson Auditorium on the second floor on **Tuesday, April 28, 20120 at 4:00pm.**