



## **Department of Housing and Neighborhood Programs**

### **HUD Consolidated Plan 2016-2020 Consolidated Plan Amendment FY 2020 2<sup>nd</sup> Amendment**

- **2016-2020 Consolidated Plan Amendment-CARES Act CDBG Allocation \$1,016,477**
- **2016-2020 Consolidated Plan Amendment-Priority Need- CDBG Emergency Rental Assistance, Rapid Rehousing, and Homelessness Prevention (addition)**
- **FY 2020 Annual Action Plan Amendment-Priority Need- Rapid Rehousing and Homelessness Prevention for ESG Match (addition)**
- **FY 2020 Annual Action Plan Amendment-Reallocation of CDBG-CV for ESG Match**
- **FY 2020 Annual Action Plan Amendment-Priority Need-CDBG Activities for COVID-19**
- **Citizen Participation Plan-Revised**

**(Public Comment Period October 26, 2020 – October 30, 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:

- Emergency Rental & Utility Assistance (CDBG)
- CDBG-CV for ESG Match

**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. A public hearing is not required but documentation relative to substantial amendment activity planning applies.**

## **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 Emergency Rental & Utility Assistance will provide housing and utility assistance to enable low-moderate income households for a limited time to remain in their homes and reduce their risk of homelessness.
- b. Add Rapid Rehousing will provide housing assistance to rapidly move homeless individual and families into permanent housing. (Match Funds)
- c. Add Homelessness Prevention will provide at-risk individuals and families with financial stabilization to prevent them from becoming homeless. (Match Funds)

**B. SP-35 Anticipated Resources**

- a. Add \$1,016,477 in CDBG supplemental allocation made available through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for activities to prevent the spread of COVID-19 and mitigate economic impacts caused by COVID-19. The cumulative amount for all allocation rounds is currently \$1,895,526.

**C. SP-45 Goals**

- a. Add 2.7 DH Emergency Rental & Utility Assistance-provide housing and utility assistance to enable low-moderate income households for a limited time to remain in their homes and reduce their risk of homelessness.
- b. Add 2.8 DH Match Fund for ESG–will fund activities that provide homeless prevention and rapid re-housing at a 1 to 1 match for Emergency Solution Grant.

**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 additional supplemental allocation of \$1,016,477 for a new total of \$1,895,526 for eligible activities that will prevent the spread of COVID-19 and mitigate the economic impacts of COVID-19 such as rental and utility assistance, health services, delivery meal programs, equipment, supplies, and materials to carry out public services, business assistance to retain employees, and administration.

**C. AP-20 Annual Goals and Objectives**

- a. Add 2.7 DH Emergency Rental & Utility Assistance-provide housing and utility assistance to enable low-moderate income households for a limited time to remain in their homes and reduce their risk of homelessness.
- b. Add 2.8 DH Match Fund for ESG–will fund activities that provide homeless prevention and rapid re-housing at a 1 to 1 match for Emergency Solution Grant.

## D. AP-35 Projects &amp; AP-38 Project Summary

## a. Add CDBG Assistance (COVID-19)-Eligible CDBG activities include the following:

- Public Service-Urban League of the State of Ark           \$100,000.00  
West Ninth Mobile Market will provide food to households' experiencing challenges that prevent them for accessing healthy foods during the COVID-19 Pandemic.
- Public Service-Little Rock Compassion Center           \$ 12,176.00  
Will purchase steri-fab sanitizer, gloves, food trays, hand sanitizer, and rent portable toilets. Due to COVID-19 and the change of the season expecting an increase in daily assistance.
- Public Service-Family Promise of Pulaski County       \$ 12,950.00  
Will allow them to hold six (6) COVID-19 testing events, purchase Personal Protection Equipment (PPE), & support the expansion of their community hand hygiene stations from four (4) sites to eight (8) sites.
- Rental Assistance-Match for ESG                                 \$214,415.20  
Will provide a 1 to 1 match for Emergency Solution Grant for Rapid-Rehousing and Homelessness Prevention.
- Rental Assistance-TBRA-Family Promise of Pulaski   \$ 47,200.00  
Will assist low income families with rent and utility payments to prevent evictions or service disconnection due to the economic impacts caused by COVID-19.
- Rental Assistance-TBRA-St. Francis House                 \$ 60,000.00  
Will assist low income families who are unable to pay their rent due to the COVID-19 Pandemic.
- Rental Assistance-TBRA-Central AR Development Council \$963,784.00  
Will provide rent/mortgage assistance and utility assistance to low income families affected by the COVID-19 Pandemic in Little Rock.

## b. Decrease CDBG Assistance (COVID-19)-Eligible CDBG activities include the following:

- Small Business Economic Loan                                 \$250,000.00  
Emergency relief program for small business owners in jeopardy as a result of COVID-19 public safety measures.
- Administration   \$100,000.80  
Administration and planning of COVID-19 activities and planning.

E. AP-55 Affordable Housing

- a. Increase 1-year goals for the number of households to be supported for homeless by 500.
- b. Increase 1-year goals for the number of households to be supported for non-homeless by 1,750.
- c. Increase 1-year goals for the number of households to be supported for rental assistance by 475.
- d. Update the narrative in the discussion section to reflect CDBG Emergency Rental and Utility Assistance and Match Funds for ESG.

**III. CITIZEN PARTICIPATION PLAN**

The Citizen Participation Plan was revised to clarify disaster/emergency and urgent needs. A disaster/emergency can be man-made, natural disaster, terrorism, or COVID-19. An urgent need have to comply with the national objective:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Community Development Division are unable to finance the activity on their own; and, other resources of funding are not available to carry out the activity.

These amendments may include funding new activities and / or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. **For CDBG, HOME, and HOPWA funding under FY 2019, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, City 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. A public hearing is not required but documentation relative to substantial amendment activity planning applies.**

**IV. PUBLIC NOTICE**

Notice of the proposed substantial amendment will be published in the Arkansas Democrat-Gazette on October 25, 2020. The 5-day comment period will be October 26, 2020-October 30, 2020. Written comments should be email to [barbor@littlerock.gov](mailto:barbor@littlerock.gov) or sent on or before October 30, 2020 to the following:

City of Little Rock  
Department of Housing and Neighborhood Programs  
Community Development  
Attn: Beverly Arbor  
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 William Grant Still Ballroom of the Robinson Center on **Monday, November 02, 2020 at 6:00pm.**