Using CDBG-CV to Address Housing Instability, 11/3/20

Kelly Price: Good afternoon, everybody, and welcome to our webinar. This is one in a series of webinars that HUD is providing on the new CDBG Cares Act funding called CDBG-CV. And this particular webinar that you're tuning into is in regards to addressing housing instability. So we'll be talking about ways to us CDBG-CV, different program models, eligible activities, national objectives, and related items pertaining to assisting households who may be experiencing issues with housing at this current time.

We hope to provide you with some updates of what is going on in terms of current needs in the market, out in your communities, and where to find resources about that. We also want to provide you with additional resources that you can use to address these issues and find information about other resources that might be available in your community.

And we hope that at the end of the webinar, that we will have left you with an increased understanding of how to use CDBG-CV funds to address housing instability needs and issues in your communities, how to set up those programs, and what program models are out there, potentially to turn to, to start to formulate the details around setting up and implementing your programs for households and needs in your community.

So again, just to update our summary of the different items we plan to cover today, is to talk about what are the housing challenges that are currently happening across the country due to COVID-19 and related issues to that? What are the national -- the various national moratoria that apply to housing, both from a rental perspective as well as some of the homeowner moratoria, mortgage forbearance issues; we'll go over those.

We'll talk about, generally speaking at a high level, what are the different resources that are available for these types of issues? CDBG-CV is just one of several different options, so we want to be sure that there's some understanding of what those other options are, and what the differences are between the different sources and different solutions.

Again, we'll talk about the CDBG-CV program, now that the notice is out. We can talk about eligible activities and national objectives. And we can also talk about some of the considerations to think about as you start to design your housing programs, and what to be aware of in doing that. And in doing so, we'll provide you, again, with some potential models that could be looked to for some aspects of those programs.

What are some of the other funding resources, and what are the considerations when utilizing those funding, and particularly when utilizing those funding sources together? And then just some other tips and examples, and cautionary items for you, as you proceed forward with setting up your program.

We will allow time, to the extent that we have it, at the very end for questions and answers. Again, as Chantel said, you have the opportunity to type those in to the question and answer box. I will caveat that by saying that this is a new program, and we're all sort of figuring this out as we go. The world is changing constantly, and so there may be some areas that you raise to us and to our colleagues, of course, that are with us behind the scenes here today on the webinar, from both the HUD Office of Block Grant Assistance, as well as the office of -- the homelessness programs are participating with us today, as well.

And in these cases, there are sometimes some things that we have to go back and talk about and sort out, and we'll provide additional information at a later date. But please do ask those questions. Please put out there areas where you may see some confusion, or not be clear on something, so that we're aware of that and can potentially address that with future webinars and other resources.

Today joining us, we have a couple of great experts from the ICF team that will be presenting on this topic. We have Cherré Palenius, she's an ICF subcontractor, actually; and Chris Pitcher, who's a staffer at ICF. And let me just -- sorry, just for a second here -- I have a quick bio.

Cherré has over 30 years of housing and community development experience. She's been providing TA in planning and delivery of numerous events and needs assessments workplans, TA, you name it in the areas of CDBG HOME program, CHDOs, NSP, and so forth related to local government, sub-recipients, and nonprofit organizations around various housing topics.

Chris Pitcher is one of our lead homeless services specialists on our team. He has more than 20 years of experience in policy analysis, in the data collection housing and homelessness. He's provided TA for HUD, the VA, and the SAMSAW office out of the Department of Health and Human Services, around homelessness issues. So we have both those folks graciously joining us today, to help us better understand, again, the housing challenges that we're seeing in the community, and how to potentially use CDBG-CV to address those.

So with that, I'm going to turn it over to Cherré to start to provide you with that information. I'm going to make sure I pass this -- there you go.

Cherré Palenius: Thank you, Kelly. So this session is focused on capturing the housing needs of communities because of the pandemic, and how these housing needs have changed, which requires that the normal distribution of grantee funds will differ when addressing overcrowding, rehousing, and housing stability.

On September 20th, FEMA released its COVID-19 Housing Resource Roadmap, noting the following four areas are the top most housing challenges currently: nonpayment of rent or mortgage, housing and service needs of homeless populations, housing and service needs of vulnerable populations, and reduced temporary housing and shelter capacity.

HUD believes the top three are the most housing challenges areas, and that number four, reduced temporary housing and shelter capacity is really a consequence of nonpayment of rent or mortgage. The roadmap describes how grantees can use their supplemental CARES Act funds, combined with your annual federal programs, for implementing potential solutions. Plus, there's a flowchart for each of these four topic areas, noting the challenges, potential solutions, resources, and support.

Critical support is needed for low-wealth residents experiencing homelessness or at risk of becoming homeless. Under-resourced renters and homeowners need help now.

National Eviction Moratoria. Effective September 4th, the CDC came out with a national eviction moratorium that expires December 31st. It applies to every state and territory with reported cases of Coronavirus. It covers all rental housing, including mobile homes or land in a mobile home park. Tenants, lessees, or residents of a residential property must provide a signed declaration to their landlord, and they provided a sample declaration.

Basically, the CDC's declaration certifies that the tenant has used their best efforts to obtain other external financial assistance available for rent or housing, they earn less than $99,000 as a single individual, or jointly less than $198,000. They are unable to pay their full rent or mortgage payment due to loss of income, reduced hours, laid off, or have extraordinary out-of-pocket medical expenses. In essence, they would be homeless if forced to leave.

Tenants and homeowners also understand they're still obligated to pay rent along with any penalties or fees after December 31st. This temporary moratorium for eviction ends the end of the year, at which time they're required to pay in full all past payments. The possibility of evictions and foreclosures have existed and will continue, with or without moratoriums.

Local housing counseling agencies, legal aid groups, and others are helping tenants with declarations in some communities.

Other Federal Moratoria. The CARES Act Eviction Moratorium expired July 24th, but the HUD PHA, Public Housing Authority and Public Indian Housing Moratorium on eviction has been extended to the end of the year. HUD FHA Single Family Moratorium has also been extended to December 31st. It is for all mortgages backed by Fannie Mae or Freddie Mac.

The FHA Moratorium is estimated to protect 28 million homeowners nationally. The FHA Multifamily CARES Act Forbearance expires December 31st, and the Veterans Administration expires December 31st. Please note that both the FHA Single Family Moratorium and the Veterans Administration Moratorium is effective earlier than the CARES Act and the Public Housing Moratorium.

The Mortgage Bankers Association estimates over 5 million renter households have missed or made a reduced rent payment, and over 10 percent have missed two or more payments or made two reduced rent payments. Over 15 percent have received permission from their landlords to delay or reduce their rent payment. Over 5 million homeowners have missed or deferred one mortgage payment.

Chris, I'm going to mute myself if you want to talk about the EFD and moratoriums.

Chris Pitcher: Thanks, Cherré. And thanks everyone for joining us this afternoon. It's important to note that eviction moratoria have a different effect on the ESG and [inaudible] CV program than on the CDBG-CV programs. ESG and ESG-CV require clients to be at eminent risk of eviction. And since the eviction moratoria, most notably the CDC eviction moratoria, prohibits legal evictions for nonpayment of rent, ESG and ESG-CV resources for homelessness prevention are unable to help clients with rental arrears.

Most of the clients presenting for ESG and ESG-CV homelessness prevention are doing so with rental arrears. And because the eviction moratorium does not allow for a legal eviction, we cannot have folks be at risk of 14 or 21 days of in eviction, and ESG and ESG-CV funds can only help in very limited circumstances, not in the vast majority.

In this situation, it is very important to think about what we can do in the very near term. Most households facing eviction for nonpayment of rent may have begun to lose their income in March. Between March and now is about seven months, and we can only provide six months of rental arrearage assistance. As such, now is the time to think strategically about how to help these households, and we cannot help anyone with -- we can only help very few households with homelessness prevention between now and the end of the year because we cannot help those with rental arrearages.

So CDBG-CV emergency assistance may be a good fit for these households in lieu of ESG and ESG-CV. We know that the eviction moratorium for CDC ends on December 31st, but local and state moratoria may continue even longer, further prohibiting the use of ESG and ESG-CV funding for homelessness prevention to help folks avoid eviction. Cherré, back to you.

Cherré Palenius: Thank you Chris. We'll get into some overview of the CARES Act funding. So in addition to the Community Development Block Grant funds of $5 million emergency -- $5 billion, sorry -- Emergency Solutions Grant received almost $4 billion, and Housing Opportunities for Persons with AIDS received another $65 million.

Housing Choice Vouchers, Project Base Vouchers, Public Housing, Tribal Nations, Section 202, and Section 811 also received CARES Act funding. The $5 billion in funding made available through the CARES Act for CDBG-CV was -- has been allocated in three separate rounds. The first round, HUD used the same formula for the 2020 CDBG program year grants. The second allocation, states and territories received funds based on factors identified in the CARES Act.

And the third round that was announced on September 11th, the secretary provided allocations to state and local governments. Additional information on the funding amounts, specific grantees received is located on HUD Exchange. All funded activities must be used to prevent, prepare for, and respond to coronavirus. This flexible source of funding is to pay for costs not covered by other sources of assistance. Duplication of benefits is not allowed. And we'll get into this a little bit more further on in the presentation.

Seventy percent of all grant funds must benefit low- and moderate-income persons. This is also known as the CDBG overall benefit requirement. It's tested separately for a grantee's total CDBG-CV grant allocation. Similar to NFP, states may use CDBG-CV funds to directly carry out activities through staff, contractors, or subrecipients in all areas of the jurisdiction, including entitlement areas.

The states must set aside no less than their first CDBG-CV allocation for use by non-entitlement units of local government. They may act directly with prior consent from the tribal entity in tribal areas. While there are three separate grant allocations, HUD considers this as one grant, not three separate grants. In addition, while the state must set aside an amount equal to their first CDBG-CV allocation, they do not have to allocate all of the funds from their first funding allocation to the non-entitled unit, that continues to a portion of their funds for non-entitlement communities from each allocation provided the total amount granted is no less than the state's first CDBG-CV grant amount.

Let's get into some housing solutions. All CDBG-CV funded activities must demonstrate that they prevent, prepare for, or respond to coronavirus. Now, CDBG has many eligible uses to address housing instability. The Quick Guide revised in April is located on the HUD Exchange. This two-page document has a chart that provides several examples of eligible activities. Grantees are encouraged to coordinate with their local health authorities before initiating a specific activity to support state or local pandemic response.

For instance, buildings and improvements including public facilities. Does the local community need a facility for testing, diagnosis, or treatment? Or maybe renovation of a community facility to establish an infectious disease treatment clinic. Another eligible activity is the provision of new or quantifiable increased public services. Think about providing testing, diagnosis, or other services at a fixed or mobile location, increasing the capacity and availability of targeted health services. Providing equipment, supplies.

What's important here is that you tie your activities back to COVID-19. For example, loss of employment caused the household's inability to pay their mortgage or rent, which is now overdue. What's hard to prove is housing rehab, making some interim improvements to private properties, enabling individual patients to remain quarantined on a temporary basis. How does this tie back to COVID? Grantees need to ensure that proper documentation is maintained, ensuring that all costs incurred are eligible. Your safe harbor is to show the tieback to prevent, prepare for, and respond to COVID.

This chart provides you with a guide relative to what activities fit under public services, public facilities and improvements, and other activities. Emergency payments for rental and mortgage assistance, housing counseling, congregate and non-congregate shelter operations are public services. Public facilities and improvements are congregate shelter capacity expansion and retrofits, or facilities for housing services, such as office space for housing counseling services or transitional housing facilities.

Other activities is affordable housing development, FEMA match, or housing services for HOME activities. Again, administrative cost for running a HOME TBRA program. So tenant and homeowner, homebuyer counseling is a public service. Other eligible housing-related activities could be your acquisition and/or rehab of buildings to create additional quarantine and isolation rooms as a public facility.

We'll take a deeper dive into each of these categories in the next several slides. Understand the need is greater than the resources, so think about how do you maximize these funds. The public services cap is waived for CDBG-CV and your 2019 and 2020 CDBG grant for activities that prevent, prepare for, or respond to coronavirus. So legal aid services, emergency payments, housing counseling, your tenant and landlord or eviction prevention, foreclosure prevention and fair housing, housing services for support of housing, domestic violence services, and legal aid.

Take the time to review chapter 7 of Basically CDBG located on HUD Exchange if you need more information specific to public services. Emergency payments may include food, clothing, housing, rent or mortgage, or utilities for up to six consecutive months. Now per 24 CFR 570.207(4), it defines CDBG income payments as subsistence-type payments. In other words, maintaining or supporting, at a minimum level, necessary to support life. So payments must be made to the provider on behalf of the individuals or family, their landlord, their mortgage lender, the private utility company.

You may pay for rent in arrears, but it must be six consecutive months, and you must have documentation for each month's rent cost. So six consecutive months means just that. You can't pay for three months; an intermittent assistance is not permitted. So you can't pay for three months, break, and then pay for another three months. Public utilities can be covered in some circumstances, but government owned utilities such as water falls under the CDBG regulations where CDBG funds cannot be used to pay for government expenses.

Who signs the subrogation agreement? Does the landlord or the tenant sign it? You're making payments on behalf of the tenant, so the tenant signs the subrogation agreement for duplication of benefits. You may, however, want to 1099 the landlord for payments received. Grantees must ensure that proper documentation is maintained to ensure that all costs incurred are eligible.

Most public services qualify under limited clientele as a national objective. If assistance extends beyond 100 days, grantees must meet the lead-based paint requirements at 24 CFR, Part 35.

Housing Counseling. Housing counseling agencies are on the frontline helping renters and homebuyer. Waivers are in place for COVID-19 to help with remote delivery of housing counseling. However, no additional funding was provided from the CARES Act. There are over 1,700 HUD housing counseling agencies across the country. You can locate a HUD housing counseling agency in your community on HUD Exchange. Search by the map or ZIP Code.

Public Facilities and Improvements. Construction, reconstruction, rehabilitation or installation of a public facility or improvement. Facilities that are designed for the use in providing shelter for persons having special needs are considered to be public facilities, not permanent residential housing. So an example is you acquisition to rehab a building to create or expand emergency shelter facilities.

Creating quarantine isolation rooms for vulnerable shelter residents. Remember, CDBG considers shelter to be a public facility, not housing. Even if this is part of a grantee's housing strategy. This would include nursing homes, convalescent homes, hospitals, shelters for victims of domestic violence, and transitional housing facilities for the homeless. Shelter expansion is good. Quarantine room retrofits and a shelter for vulnerable shelter residence. Installation of public improvements for affordable housing and development of transitional housing facilities for rehousing.

Remember that 80 percent of your CDBG-CV funds must be expended in three years. Therefore, look for projects that are already in the pipeline seeking additional gap financing. And does the project tie back to COVID? The requirement to prevent, prepare for, and respond to. And then finally, does it make sense to use your CDBG-CV funds?

The national objectives for CDBG housing solutions is limited clientele, low-mod housing, and urgent need. So how do we link these national objectives with emergency solutions grants and other resource programs?

Let's dive in to the national objectives. So from limited clientele, emergency housing payments, housing counseling, housing support services, operations of shelter, legal aid, domestic violence are all public service activities. Public facility improvements for shelter, housing services, and transitional housing. For example, buying a building for conversion into a shelter or isolation room as a public facility.

Remember, for limited clientele, 51 percent of the participants need to be documented as low-mod, with the remaining clients, 49 percent may be any income, which means you need to collect income and household size information. Be careful here when documenting income and household size. A math error could mean you're out of compliance, so you may want to use a 52/48 or 55/45 to ensure you're in compliance. For more information on these distinctions, grantees should review Chapter 3 of Basically CDBG.

For low-mod income housing, only in support of housing development, you can do housing rehabilitation activities. Rehabilitation, reconstruction, of affordable rental. In essence, expanding the number of rental units to rehouse residents displaced by COVID. Public facilities and improvement activities, when they are used to support development of housing is low-mod housing.

So onsite improvements to publicly held land that will be transferred to an affordable housing developer for affordable rental housing. Be careful because transitional housing, group homes, and shelters are not considered housing in CDBG. So again, low-mod housing is only is support of housing development. Through the lens of CDBG, discharge shows where ESG, HOPWA, and HOME activities are located.

The idea here is to coordinate your investments with these other funding partners to address the overwhelming need throughout your community. Your ESG providers want to coordinate with CDBG-CV grant teams. Don't forget, you still need to meet the CDBG 70 percent overall benefit.

Duplication of Benefits. Section 312(A) of the Stafford Act imposes a duty that HUD ensure no duplication of benefits occurs using the necessary and reasonable standards in 2 CFR, Part 200. So grantees must prevent duplication of benefits, which described here, occurs when a person, household, business, or other entity receives financial assistance from multiple sources for the same purpose. And the total assistance is more than the total need.

Grantees must have policies and procedures for duplication of benefits. Before paying a cost, grantee should check to see that the assistance to be provided has not or will not be paid by another source, including insurance. With the national eviction moratorium, a renter homeowner must sign a declaration indicating their inability to fully make their house payment.

Likewise, many grantees have initiated a similar declaration or subrogation agreement for assisted individuals, certifying that their need for assistance, and what other financial assistance, if any, they have already received. CDBG-DR has sample subrogation agreements located on HUD Exchange.

Now, the federal funding priority order for non-congregate shelter provides grantees with additional information. What FEMA public assistance fund can pay for, such as food, security, and other basic needs. Whereas, wraparound services are not eligible. Case management and housing navigation, yet could be paid with ESG-CV money or CDBG-CV money. Once the FEMA money is gone, think about how you're going to continue providing these necessary services.

Grantees must be aware of the other sources of assistance that may be available to pay for Coronavirus related needs to avoid duplication of benefits. It helps grantees design programs that target the needs that are unlikely to be addressed by other sources. It helps you also know which alternative sources of assistance you need to look at before providing assistance to individuals, households and entities as they complete their DOB check.

Assistance is not prohibited to meet needs that remain after considering other federal, state, local, or philanthropic financial assistance. Private, unsubsidized loans generally are not considered a duplication of benefits. In some cases, subsidized loans do not cause a duplication if all assistance is used for disaster-related needs.

So a family seeks emergency rental assistance under a ESG funded homelessness prevention program that provides assistance for up to six months. Grantees need to first assess the need, then determine other sources that have been or will be used to pay all or part of the cost, calculate the maximum award, or the unmet need, and then document compliance.

Let's do an example. Family's application indicates their monthly rent is $800, and they indicate their monthly utilities are $200. Now, you want to make sure that the utilities are based on actual cost. We're using $200 for this example. So the total need for the family is $1,000 for six months. That's assessing the need. Determine the assistance from other resources for the same costs.

In the application, it asks whether the family is receiving assistance from another source. The family indicates their church has pledged to pay their utility bills in arrears for the next three months, and they certify that they have not applied for any other assistance from anyone else. Now we do the math. Calculate the maximum monthly award or the unmet need to avoid duplication of benefits. So for months one through three, their monthly rent plus utilities is $1,000 minus the $200 that the church has pledged to pay their utility bills.

That means months one through three, $800 is the maximum per month assistance. Months four through six would be $1,000 because they do not have another source assisting to pay their utility bills. Document compliance. Document your calculation. $800 x 3 is $2,400. $1,000 x 3 is $3,000, for a total amount of $5,400.

Housing Program Design Considerations. Housing needs have changed. During this pandemic, housing needs have changed. Overcrowding as families are doubling up can lead to family transmission and a disproportionately affecting minorities. Medical transportation and service workers who need quarantine and recovery from COVID may not have the funds to support the need.

Thirty million workers filed for unemployment insurance March through May. Think about the industries and workers hit the hardest. What industries are not back to work? The top three areas of unemployment have been mining, quarrying, and gas and oil. And arts, entertainment, and recreation, followed by accommodations and food services.

So collectively view your community data elements. If you haven't already, quickly review your data elements from local, state resources, but don't stop there. There are a number of national websites with current community data and resources available. The American Community Survey (ACS) on the census website has detailed population and housing information and recently added the COVID-19 information with the weekly household pulse survey and community resilience estimates.

The ACS also provides state, natural area information for telework, food scarcity, housing insecurity, likelihood of eviction or foreclosure, and difficulty paying for unusual household expenses. The eviction lab at Princeton University tracks COVID-19 evictions for some locations. Enterprise Community's Opportunity 360 has a COVID-19 update community dashboard.

It contains the number of confirmed COVID-19 cases and lives lost, unemployment rates for the most recent 36 months, percentage of students with no computer or internet, percentage of commuters who rely on public transit, etc. And a new dashboard that features state and county level indicators.

The National Low Income Housing Coalition's Out of 2020 -- Out of Reach 2020 report provides state facts on the average renter wage, housing wage, number of renter households, fair market rent, annual income needed to afford a modest rental unit, median wages for the largest occupations.

For your state data, you scroll over the state and click on more information for that additional data. You can also scroll down and enter a metropolitan area ZIP Code for the data on the percentage population that is most rent burdened or paying more than 30 percent of their income for rent.

So where's the greatest need? How would you target your resources, and how much time do you have to spend? Remember FEMA indicated the top four housing challenges: lack of income, homeless or at-risk status, vulnerable population, and temporary housing and shelter capacity. Now that you've collected and updated your data, where is the greatest need? How will you target your resources? By income? Some communities are setting their income limits using 2020 federal poverty guidelines.

My home state, Minnesota, is using both a 300 percent and 200 percent poverty guidelines for its income thresholds. So what income limit will you propose? Less than 30 percent area median income? Less than 50 percent? Less than 80 percent? By homeless or at-risk status, or for vulnerable populations?

The CDBG is primarily targeted to low-income populations. You can also design a program that supports low-mod income and some low-mod income -- non low-mod income beneficiaries. As we mentioned previously under the limited clientele slide, think about what happens as the moritoriums expire. Do you want to do some 51 and 49 or 55 and 45, which allows diversity of targeting, stabilizing owners' middle income and establishing community stability, preventing an area from foreclosures possibly in 2021?

So what assistance is currently available? Emergency payments for rental or mortgage assistance, utility payment assistance. You'll check with your utility providers, as some of them are offering forbearance or have placed a moratorium on the suspension of service due to nonpayment. Waiving fees and security deposits, hotel or motel housing support, homeless shelters and churches.

Check with United Way and your local foundations and funding partners to determine what assistance they are providing and where they see an unmet need. What is needed and not available?

Funding Resource Considerations. You may be able to tap into or leverage the CDBG-CV funds with other funding resources and programs, which include treasury's Corona Relief Fund, FEMA, Emergency Solution Grants, HOPWA, HOME, particularly tenant-based rental assistance. Now, HOME did not receive additional funding through the CARES Act; however, there have been waivers and flexibilities. If you want more information, the June HOME TBRA webinar is located on HUD Exchange.

State housing and other entities, local organizations, private funding. Think about other programs that can pay for these resources first, and the need for layering funding opportunities. There is no individual assistance. FEMA comes in only on non-congregate sheltering, but the need is greater than the funding.

FEMA's Roadmap. This 12-page document describes how grantees can use their supplemental CARES Act funds combined with your annual federal programs for implementing potential solutions. Remember the current four top most housing challenges are nonpayment of rent or mortgage, housing service needs of homeless populations, housing services needs of vulnerable populations, and reduced temporary housing and shelter capacity, which is a consequence of nonpayment of rent or mortgage.

In this document there is a flowchart for each of these four topic areas, noting the challenges, potential solutions, resources and support designed to help state, local, tribal, and territorial partners locate opportunities to leverage money across federal programs. Now I'll transfer this presentation over to Chris.

Chris Pitcher: Thanks Cherré. All right. Before I get into this slide, I wanted to repeat what I said on the eviction -- the federal eviction moratoria as it relates to the Emergency Solutions Grants, ESG, Emergency Solutions Grants CARE Act ESG-CV program. I just want to recap that -- I saw a bunch of questions in the Q&A.

So when the federal eviction moratorium or local eviction moratoria are in place, ESG and ESG-CV funds for homelessness prevention are only able to be used in circumstances other than nonpayment of rent. So when a client damages a unit, when they're not legally on the lease or they are doubled up, they could potentially receive homelessness prevention funds from ESG and ESG-CV.

But if they're coming for assistance for nonpayment of rent during an eviction moratoria, ESG and ESG-CV funds cannot be used to help prevent homelessness and help prevent that eviction. As such, it could be a good strategic idea to use the flexibilities of the CDBG-CV program to use emergency assistance to help assure folks are not being evicted. As this eviction moratoria continues in communities, it will be harder and harder to use ESG and ESG-CV funds for clients who began to lose their income due to COVID in March and April, as those are going to be six and seven months behind already.

So now is the time to ace on CDBG-CV emergency assistance to help folks who are behind on their rent. One the eviction moratoria ends and folks can be legally evicted, ESG and ESG-CV homelessness prevention can then begin to be used for folks who have nonpayment of rent and arrearages. I just wanted to recap that, because it's very different than this slide.

The chart here is a summation of the federal funding priority for non-congregate shelter where the public service is to save lives, to protect property and public health, and to ensure public safety. It is information for organizations and agencies providing assistance to individuals experiencing homelessness. As you see here, a link for the federal funding priority order for non-congregate shelter during COVID-19 was released in July 23, 2020 this year.

And here is the order of things. So when there's an initial request, an implementation of a non-congregate shelter during a public health emergency, the funding priority order is FEMA, public assistance category B, and then either CDBG or ESG-CV. You'll see in the second pictorial the extension of non-congregate shelter after the end of FEMA approved non-congregate shelter projects, so FEMA has left. And again, now we have the ability to fund with CDBG-CV or ESG-CV.

Here, in the third pictorial, transitioning individuals from non-congregate shelter. The order is ESG-CV first, CDBG-CV as a last resort, and the winding down of non-congregate shelter after FEMA public assistance ends. Again, ESG-CV and then CDBG-CV as a funding of last resort. Again, this is very different from the information I provided around homelessness prevention and emergency assistance as ESG and ESG-CV during an eviction moratoria, we really are able to help the vast majority of clients. So it's very different funding priority for homelessness prevention and emergency assistance under CDBG-CV.

Much like CDBG-CV, ESG-CV is very specific in what it is intended to do. So ESG-CV funds must be used to prevent, prepare for, and respond to coronavirus. But unlike the ESG-CV, we really are focusing on individuals and families who are homeless, receiving homelessness assistance, and to support additional homelessness and homeless prevention activities to mitigate the impacts that the Coronavirus has had on the clientele that are at-risk or actually experiencing homelessness in our communities.

We have several things -- several rules and notices within our program of ESG-CV that our funds must comply with, including the CARES Act itself. The ESG Program Interim Rule: ESG-CV is a sub-program of the ESG program, so unless otherwise provided as an alternative requirement or a flexibility in the CARES Act, or the ESG-CV notice noted here at the bottom, the ESG program interim rule is the rule we rely upon.

Last, but not least, we do have the ESG-CV notice, CBD-20-8 that provides alternative requirements and flexibility for us to serve clients differently under the ESG-CV program during the COVID-19 crisis. The eligible use of the ESG-CV include all components of the ESG program, including street outreach, emergency shelter, homelessness prevention, rapid rehousing, HMIS data collection. And HMIS is the Homeless Management Information System, the data collection system of the continuous care, and admin -- the admin cost of the ESG-CV program, which were increased to 10 percent under the ESG-CV program.

However, the ESG-CV program has additional flexibilities that the ESG program does not. And again, we must prevent, prepare for and/or respond to the Coronavirus. We can do so in our street outreach programs by delivering services to those literally on the street and in need of service. At our emergency and now our temporary shelter. So we added a new category to ESG-CV called temporary emergency shelter. So for emergency shelter, we can pay for operations and renovation.

We can acquire new locations for temporary shelter only. Temporary emergency shelter. We also have the ability to put folks in hotel/motel vouchers to prevent them from being in congregate settings where COVID-19 is more likely to be contracted. We have the hotel and motel costs for isolation in quarantine. For those receiving COC, which is the Continuum of Care program or ESG Rapid Rehousing or ESG Homelessness Prevention, or residing in any of our permanent supportive housing programs.

Rental assistance, utility assistance, moving costs are all available to the Rapid Rehousing and Homelessness Prevention programs. And we have, lastly, great flexibility with landlord incentives. So we are able to, under the rapid rehousing and homelessness Prevention project, pay for extra security deposits, signing bonuses, pay for extra damages and cleaning, and some of those costs can be two to three times the rent. These are incentives that we haven't had before at our disposal in the Emergency Solutions Grants program, but we do for the Emergency Solutions Grant CV program.

Under certain ESG and ESG-CV components, we also have a focus on case management. And again, this is to prepare -- prevent, prepare for, and respond to the Coronavirus. We have a lot of focus on case management, getting folks the services they need during the pandemic, connect folks to mainstream services and resources. We have services for outpatient health services, outpatient mental health services, legal services. Last, but not least, in almost every point of our homeless service system, we have the ability to divert or housing problem solve clients that are experiencing homelessness or that are at-risk of homelessness.

Even though we have an influx of nearly $4 billion in the ESG-CV program, it is not enough money to house every person in our community at risk or experiencing homelessness, so we still need to do diversion and problem solving, really work on housing stability at the first conversation with clients, and try to get them. And we can do that in the street outreach environment, in emergency shelter environment, in a rapid rehousing homelessness prevent environment, really throughout the homeless services system, we can be doing diversion and problem-solving, and that is part of our case management services that see under ESG-CV.

As a requirement for the ESG-CV, we need to be able to document how program activities are structured to prevent, prepare for, and respond to the effects of the Coronavirus. We do so in IDIF, via the activity description, and we also need to document program participant eligibility. This is for all ESG program participants. It's very detailed on how we document program eligibility. Obviously, program eligibility for someone experiencing literal homelessness on the street is different from those that are at-risk or needing homelessness prevention services, so we do have a fairly detailed way of documenting that eligibility in our ESG and ESG-CV documents listed a few slides before.

With that, I will turn it back to Cherré.

Cherré Palenius: Thank you, Chris. Okay, Funding Resource Highlight Summary - Through the Lens of CDBG. This chart breaks down the various federal programs and the public service activities available per program, recognizing how CDBG language differs from other programs. For instance, CDBG-CV calls emergency payments rental assistance and ESG-CV says it's rental and utility assistance.

HOPWA is short-term rent, mortgage, and utility assistance. And with HOME, it's TBRA. With ESG, HOPWA, they can offer case management, which includes street outreach, homelessness prevention, rapid rehousing, shelter operations, including building operations. Recognize CDBG talks about congregate and non-congregate shelter operations were HOPWA talks about hotels, motels, temporary shelter, operating expenses of short-term and transitional facilities.

This chart indicates the activities for public facility improvements and other activities. Again, broken out by funding. So public facilities with CDBG-CV is acquisition, construction, reconstruction or rehabilitation of shelters, facilities for housing services, transitional housing. ESG is acquisition of temporary emergency shelter and HOPWA is acquisition, new construction, rehabilitation, conversion for facilities providing housing and services.

CDBG other activities are housing services, like housing counseling, FEMA match and the HOME activities, which is -- our housing services for HOME activities.

Program Design Considerations and Requirements. Consider collaborating and partnerships to increase your efficiency. Use experienced, reliable organizations to distribute funds. What other community organizations can you collaborate with to get your program up and running? A community action agency, your local financial counselors or housing counselors, legal aid. Review and maximize your existing program funds designated for rental or mortgage assistance, HOME, ESG, and HOPWA.

Think about what skills, experience your staff has, and what skills and experience other staffing organizations have that can complement your staffing. What other programs are currently providing assistance, and what type of assistance are they providing? What existing housing programs do you currently administer? Think about redirecting funds to maximize your resources.

Think about staff capacity and experience administering a new or revised program. Identify a point person to coordinate your program and respond with other program staff, government, nonprofit providers, philanthropic funders, property managers, apartment owners, lenders, etc. How do you design your program? How great is the need, and where? How many households can you assist? What can you implement quickly? Nationally, it's estimated over 12 million renters currently need assistance.

Program Design Tips and Examples. So use experienced organization to distribute funds. HRAs and PHAs have experience administering rental and emergency housing programs. Reallocate budgeted local funds to emergency housing needs, combine those with flexible local funds and philanthropic funds. Identify new funds that can be allocated for housing assistance. And maximize existing program funds designated for rental or mortgage assistance.

Applicants need to document their loss or reduction of income related to COVID-19 hardship. The grantee has to tie the use of funds back to COVID-19, prevent, prepare for, respond to. Identify who is most at risk, who has reduced income or lost jobs to shelter in place, creating housing instability. Provide short- and medium-term assistance that covers up to six months of back rent to renters that are close to losing their housing.

Reach out to landlords and property managers - what are their concerns? Discuss requirements they will need to initiate or agree to. Per HUD, nearly half of the 49 million rental properties are owned by individual investors, mom and pop landlords. Many existing programs require significant documentation from applicants, which can be barriers to assistance. Many programs also require landlord participation, which further complicates renters' ability to access assistance if the landlord refuses.

Most existing programs that pay landlords directly require landlords to agree to participate in the program and to complete a W-9 form. Some programs also require certification of suitable rental quality, registration, and/or up-to-date property tax payments. Don't rely solely on web-based internet forms and outreach to non-assisted renters and homeowners.

You still have to adhere to federal, state, and local laws, but maybe you want to create flyers that can be placed in food bank parcels, placed at the library, schools, or used by local organizations providing emergency assistance. TV media, realtor associations, or Chamber of Commerce. To reduce expenses, some households may not be paying for internet or have reliable access when libraries are closed or have reduced hours.

Rebuilding community systems prevents bad actors from taking advantage of the vulnerable in the community. And don't forget to do a self-assessment on yourself. Are they using your resources? Are you making an impact? You need to review to determine if your programs are meeting the targeted population needs. Are funds moving? Don't forget to conduct routine re-evaluations. Make sure you're on target for meeting your objectives. Otherwise, re-assess or tweak your program where needed to eliminate barriers or problems. The need for assistance has greatly outpaced the available funding.

Now, we'll wrap up with two program examples. This example is a state that's pooling their local resources collectively with their county resources to create a rental or utility assistance program. The state staff accepts, reviews, and reviews the initial applications that are submitted online. They are then passed on to a community provider, a housing counselor, or financial coach that works directly with the applicant verifying their income and need for assistance.

In turn, the state pays for applicant processing, supporting the operations of the community provider. The housing counselor financial coach were already familiar with income verification process and documentation. In some instances, landlords are submitting applications on their rental property for tenants needing rental assistance. Again, all applications are submitted via the state's housing authority's portal and then are offering a maximum of $5,000 available for each tenant.

Another example is where a state is disbursing funds to every county, who in turn is sub-granting the funds to homeless providers and other local organizations that provide renter assistance. The program is targeting applicants with incomes below 50 percent area median income that are severely rent burdened. Tenants pay more than 50 percent or more of their income for rent, have been homeless in the past five years, have been evicted within the last seven years, experienced housing discrimination or one family member has a disability. Counties must equitably disburse funds based on demographic percentages.

For example, if a county -- in a county 16 percent of the population living in poverty is black, 16 percent living in poverty is Hispanic, with another 1 percent American Indian or Native, then in accordance with your contract with the state, that county must distribute 16 percent of its rent relief to black residents, 16 percent to Hispanic residents that qualify, to ensure funds are distributed equitable. The state only released half of the funds and will intervene before releasing the second half, should the county fail to meet its equitable distribution goals.

So now we're into the Q&A. James, do you want to un-mute your line? There were a few questions that you were going to respond to.

James Höemann: Sure. This is James Heyman, the director of the Entitlement Community's Division at HUD. We're kind of in the background as quiet observers. So there's a few things that came up in the chat box that I think we'll just go ahead and cover, that we'll have a little more detail in the future. One of them is the lead-based paint requirement for the 100 days. This came up not too long ago on another webinar that we had, and we've been working out internally.

There's been some different guidance given across the country that -- I wouldn't say it necessarily conflicts what the office at headquarters wishes to convey on the 100 days requirement for lead-based paint. But in some cases, it is insufficient guidance. One of the things that we do have nailed down, of course, is actually the documentation part of that, in terms of doing the visual inspection, using still photos and having the recipient actually go through their home with, using Facetime or something to do a walk-through.

But I'm hesitant to say too much on that, but we are working on a question and answer document from that office, which is our Healthy Homes and Lead-Based Paint Office that covers that requirement. And also doing an exchange similar to this for the training for our field offices and our grantees on what that requirement is. And of course, that kicks in based on the rent and the mortgage payments for the six-month period, because we're going beyond the 100 days. So that's something that we're currently working on and hope to have that out soon.

One of the other things that continues to come up is the payment of arrearages. And we also have a question and answer document for that. That is going through the approval process right now to post, and once we post that on the HUD.gov site, it'll be shared over on the HUD Exchange as well, and you'll be able to access that. Essentially, a lot of the questions we've gotten on that is how far back can we go on arrearages? And the answer on that, of course, is you could pay the current month and as far as five months in arrears. So you can cover that whole six-month period, as long as the month that you're currently paying for is the current month, if that makes sense. Or the existing month, I guess, rather, that you're paying. And then the five months are the ones in which they are behind on.

Again, that document will come out, that will cover both the 19 and 20 CDBG funds that you're using for CARES Act purposes, in response to COVID-19, and the CARES Act or CDBG-CV funds themselves.

I think one of the other questions that continues to pop up as well, is another document that we're working on that is around paying for the government-owned utilities. That -- that's a rather hot topic here lately, I'll say that. Something that -- as we've kind of gone through this process and have developed a notice and have been developing our policy, this is one of the areas that, as a program, even though it's been around since 1974, is still lacking some areas that we have yet to come out with determinations on.

We've had a lot of internal discussions on how to do this, and I know this is really popular in the Midwest. I myself am a Midwesterner, and government-owned utilities is nothing new. There's also a couple of places in the southeast that we know of -- one in particular where the entire state -- it's required that the municipalities own the utilities. So this is something that we've kind of gotten into, and we have a question and answer document for this.

[Inaudible] Congressmen or Congresswomen. In that case we've looked back and used our brains in rolling out what the requirements are for that. I will say there are some particulars that come with paying for utilities that are owned by municipalities, mainly because we're triggering some of the aspects in 2 CFR, Part 200 with the cost principles.

There's also some things that need to be examined as well when we're looking at how those charges are being made, and what they're paying for in terms of per-unit cost delivery, whether or not the board for the utility is separate from the municipality itself, and whether or not there's any profit that is being drawn off of those charges. So that is something that we had not anticipated, that we needed for both the regular annual CDBG program, as well as CDBG-CV. We should have that coming out here, probably within the next couple of weeks we'll be able to get that posted.

I think that is all I saw that was given to me to ask for, so I'll turn it back over to you.

Cherré Palenius: Okay, I clicked back on, but apparently not. Kelly, you've been unmuted.

Kelly Price: This is Kelly, I'm back. I apologize. I've done 100 webinars and never had that happen. But I do sincerely apologize.

James, I missed some of what you were saying there, earlier, and just wanted to -- I had notes here on just some of the common questions, so some of these you may have hit on, and other perhaps not so much.

The rental issue of arrears, I think you hit on that. For whatever reason, there seems to be some lack of clarity of whether or not they can in fact pay rent in arrears. And I think we said that's eligible, provided it's no more than six months total.

James Höemann: Yes, that is correct. Yeah, our regulation clearly says a series of consecutive payments, and so we waive that requirement in the regulation from three months to six months.

Kelly Price: Correct. Yeah, we got lots of questions on the three or six months, so I think that's clearer and it's on the slides. The other was paying rent in the future, so going forward. For example, the family three months behind and perhaps unstable in terms of their job or what-have-you and anticipate not being able to pay the rent the next three months. I think I know what the answer is to that, but I wanted to make sure. Paying future rent, not eligible? So rent going forward that has not been incurred yet.

James Höemann: Right, I think it's important to keep in mind that from auditing and grant management standpoint, we have to have the documentation for the months in which you're paying. So let me kind of break this into two ways to look at it. One is if we're paying for rental arrearages, then we need to have a statement for each month. What you don't want is one statement that has one large payment. You need to have an individual statement for each month, so that we can show that you're paying for each month.

In terms of looking at going into the future, the answer to that is no, you can't pay forward on the rent, but you can, once you've put them in that individual program for that six consecutive months, and you're in month two, you just leave them in your internal program, and you should have that outlined in your policies and procedures. Then you just continue to keep them in there until you carry out that six months, having that documentation for that rental payment for each month.

Kelly Price: Right, right. And that's related to other -- there were a significant number of other questions that were -- perhaps it wasn't clear during the presentation that did in fact the payment need to be a one-time payment only? And that's all that was allowed by you guys? Or in fact, could it be multiple payments, depending on the situation?

It sounds like as long as it's no more than six months, that -- the policies and procedures should outline exactly how those payments are going to flow and who they're paid to. And I think the emphasis here always needs to be on the fact that we have to show the tie back to COVID, so that prepare, prevent, respond. So that's another reason why you're not paying future rents ahead of time, because you have to document that in fact there still is that need there. Correct?

James Höemann: Correct. Yeah, I think it's -- so, that's one of the biggest distinctions we have with using the waiver for the six month, as well as your public service waiver, is that you have that additional documentation piece that says how this activity's either preparing, preventing, or responding to a Coronavirus outbreak. And that's how you're going to have to separate out that activity from regular annual CDBG where you don't have a public service cap waiver, and you're still tied to three months. So that's that additional piece of documentation we need on all of the activities, actually.

Kelly Price: Right, so essentially what several folks are writing in as we're talking about this is, if you decide to proceed with this type of activity, you're essentially signing on to run a short-term rental assistance program. And it has to have all the policies and procedures, and systems back behind that to be able to ensure that you're not paying rent forward, that there is a connection in the documentation to COVID prepare, prevent, respond, that you've done the DOB check, the income qualification, and all of that that goes behind a program like that.

Which kind of gets to Cherré's point earlier of to the extent possible, partnering with organizations that already do that in your community, if possible, because they potentially already have those systems set up.

James, we had a lot of questions also, of course, about the utility issue, which I think you addressed, as well as taxes. And I don't know if you reiterated that. I know we chatted about that a little bit, but particularly as it's relevant to mortgage payment, and whether or not mortgage payments that include taxes could -- whether that tax element of that payment could be paid. And it's my understanding that if it's required as part of the mortgage payment, which often lenders do require that they escrow for taxes, that in fact it could be paid with CDBG-CV, assuming it meets all the other requirements connected to COVID and eligibility and all of that?

James Höemann: Yeah, that was one of the ones I missed. I was trying to hold everything in my head. So as far as paying the taxes if it is part of the actual rental payment or mortgage payment itself, then yes, that would be part of it. Or the PIPI, I guess, if you will. But as far as paying taxes by themselves, that is not covered by CDBG because the taxes are being paid directly to the jurisdiction or municipality, and the loss of tax revenue on their behalf is not considered enough of a tie-back in order to make that expense eligible for CDBG.

Kelly Price: Right, okay. I wanted to emphasize -- I've heard James, you and Jesse on prior webinars and other venues where you guys have been out discussing the program and what you can use the funds for. We had a number of questions about duplication of benefits, and I guess, number one, as you probably have already emphasized, there will be guidance coming out from HUD on duplication of benefits and how that applies to CV, and some additional tips for how to navigate that and calculate DOB.

But we did receive a number of questions about whether or not ESG and the PPP program and others would count. And the answer generally is yes, but the point of duplication of benefits, which comes into play because of the Stafford Act, which is the disaster declaration under which the CARES Act was issued or enacted, is that you have to determine whether or not there's a duplication of benefits in that more than one federal source of funding is paying for the same cost, or the same expense.

So I know James, you guys at HUD have been emphasizing that having policies and procedures and understanding how that applies to each program type you might undertake, and each individual that you assist is really important, is there anything else that you would say there, just generally about DOB, pending that additional guidance that you guys have coming out?

James Höemann: Yeah, I'll have to apologize. I cannot find my reading glasses, but I'll -- I would read this piece from the notice from you. But yeah, policies and procedures is the big thing because we do have the requirement and the notice that they have -- that they have those policies and procedures, specifically for DOB in a way to actually assess them. And we have coming up soon, another duplication of benefits piece on that. We've also been working with our other federal partners to come out with a much larger document that covers the programs that are available.

As you may be aware, the CARES Act doesn't give CDBG a pecking order, if you will, in terms of who you need to go to first. Usually we defer, of course, to FEMA. But in this case, there may be multiple sources that can pay for that particular item. And one of the things we've been encouraging on our webinars is to use the best source of funding for the activity that you’re delivering.

But I think the key really is to kind of go back and look at what we already have on the website for duplication of benefits. And if you have questions or need assistance in terms of developing your policies and procedures for DOB and for the analysis of that, then we can certainly provide you with that. But that's going to be one of the key things.

I think one of the other things to mention here too, is that, under the CARES Act there is two separate accountability pieces that are put in there. One is with the government accountability office, and that is primarily more for us as an agency, in terms of how we're looking from risk, and how we're monitoring, and what types of policy guidance and that, that we're putting out in technical assistance.

The other side of that, of course, is that there is an OIG oversight board that is being developed, and they have been given specific charge to go out and do audits based on the CARES Act requirements. We already know what the GAO piece looks like because we've been interacting with them now for about eight months. We have not quite seen yet what the OIG's sort of full menu, I guess if you will, and what their plans are as far as audits and how they are going to carry those out.

So one of the things we've been driving home with everyone is make sure you have policies and procedures for your activities and for your programs, and if you need assistance, let us know and we can help you get that.

Kelly Price: Great, thank you. I think the only other area I saw a number of questions about, and Chris, I hope you're still on, and Marlisa from SNAP, is just one more time, clarifying the situation with the eviction moratorium and how that interplays with CDBG-CV versus ESG-CV, because I'm worried that there were a couple of questions that people leaving with the impression that they can't use ESG, regular ESG, or even ESG-CV, or even CDBG-CV at all, due to the moratorium, and that is not what we're trying to say here. Do you mind, Chris, to repeat that one more time as simply as you can? What we're trying to express there with the difference between the two funding sources and how they moratorium affects that?

Chris Pitcher: Yes, I'll try, and Marlisa, please you also can make it more simple. So under an eviction moratorium, ESG and ESG-CV are unable to provide homelessness prevention to clients at risk of homelessness that are being evicted because they can't be legally evicted. And the ESG and ESG-CV programs require folks to be at imminent risk of 14 or 21 days of an eviction, and since legal evictions are not allowed under the eviction moratorium for nonpayment of rent, we can't help the vast majority of clients in that category.

We can still help folks who are doubled up, who are being evicted for other reasons like damage to a unit, or who are not legally on the -- not legally on the lease, we can help those. But the vast majority of clients that we see in ESG and ESG-CV are for rental arrearages, and they can't be legally evicted until those eviction moratoria are lifted.

Marlisa, would you have anything else to make that more simple?

Marlisa: Yeah, I mean I think it would still -- like a general recommendation, because we know that -- or what we've gleaned from the limited amount of information and evidence on homelessness prevention or the efficacy of homelessness prevention, is that the vast majority of tenants who are facing eviction will not become homeless.

So in trying to use ESG and ESG-CV for folks who are in the most need of assistance to prevent them from becoming homeless or helping them regain housing stability when they are homeless, the ESG and ESG-CV are better used for rapid rehousing to help those from shelters and on the street into housing, or when household are at -- have other risks of homelessness that are included in the at-risk definition, to try to use those to prioritize those who are at most need, and target your homelessness prevention as tightly as you can to make the biggest impact on homelessness and the risk of homelessness in your community.

And I'm also going to post a resource in the chat. It goes over homelessness prevention eligibility requirements during eviction moratoria and it explains just the limitations on using homelessness prevention when trying to assist someone who is facing an eviction initiated by a landlord or property owner. And it goes into more detail about the ways that you can use homelessness prevention in the other situations when someone's at risk of becoming homeless.

Kelly Price: Thank you. That's very helpful. And the question that several folks asked was, in confusing all these moratoria, can I still use CDBG-CV if the moratoria exists, or in my state? Each state also has a lot of different things going on. And the answer is yes. CDBG-CV is not affected necessarily by the moratoria. But again, you have to have policies and procedures to document that that family does in fact need the assistance, that it's due to COVID, prepare, prevent, respond. That there is no duplication of benefits, it's not going to exceed six months, and all the other requirements that we've talked about.

So CDBG-CV can be used today and going forward, assuming you get your program set up quickly to address the issue. And ESG-CV perhaps might come into play later, if this situation continues to draw itself out.

I know we're about out of time. Chantel, I just wanted to mention, there were a large number of questions also about the lead-based paint requirements and the lead-safe housing rule and how that applies to some of the activities that might be undertaken. Both rental assistance in terms of the units folks are living in individually, as well as some of the projects that were also asked about that are more of a public facility based renovation, rehab, upgrade, that kind of thing, due to COVID.

So James, it's my understanding that HUD is working across offices between Block Grant and the office of Heathy Homes and Lead Hazard Control to put out some guidance on that, and that that's coming fairly soon. Is that correct again? Sorry to put you on the spot again.

James Höemann: That's okay. I actually had mentioned that when you were having some struggles there with your mic.

Kelly Price: Right, okay. Fantastic. I didn't want to leave people hanging on that. And I just wanted to mention, and certainly jump in here as well, that as we wrap up, I know that there was a lot of information presented today, and that we're right in the middle of all this together, and there are a lot of questions. Do know that HUD is working very, very hard to issue additional Q&A or FAQ. There are a number of what we call quick guides, which will be the short, up to five-page sort of guidance documents that provide you with more detailed information on different types of activities.

One of those being rental assistance, for example, that are due to be published soon. There also -- on the CDBG-CV part of the HUD Exchange website -- there are also, if you go to the CDBG-CV page of the HUD Exchange website, you will find a button there where you can submit and ask a question. We have an AAQ desk set up. It's been running for -- I don't know -- a month, six weeks. And we actually have not had as many questions coming into the AAQ desk as we thought we would have.

So there is an AAQ desk that's active essentially seven days a week, with a very quick turnaround time. There are eight companies that are manning that desk that are ready and prepared to provide answers to you in collaboration with HUD. There's also a live button now on the HUD Exchange website to ask for TA.

There's an on-call TA button that you can push if your community is really struggling with understanding the notice and the requirements and trying to figure out what's going on in your community, and the best way to spend the funds in compliance with the requirements, and you need specific help to really work that out, you can request TA through that website, and that request will go into HUD and be assigned to a technical assistance provider to start helping you immediately.

So we are now open for business on the technical assistance side as well. And in addition, they'll be coming down the pike a toolkit which will have -- a number of you asked for samples of agreements and manuals and forms and policies and procedures, and things like that. We are in the process of developing a toolkit as well for CDBG-CV which will have some of that information in it, as well as links to other programs and best practices out there that you can turn to to ask for those documents.

So I hope -- James, did I miss anything in terms of all the things you guys are working on? Is there anything else you would mention to close out our session?

James Höemann: No, we have a long list of those TA products and webinars lined up to continue to roll out here, through the end of the year and the beginning of next year. We have a lot of things moving right now.

Kelly Price: Exactly. And folks have asked if -- easiest place to find the information, got to HUD.gov of course. There's a COVID page immediately obvious on the HUD.gov landing page. And then HUD Exchange, just click on programs at the very top right. And then a box will show up and go down on the letter C to CDBG-CV. That will take you straight to the information that you need if you're not having good luck with the search function.

So just want to make sure -- I never like to leave anybody empty-handed in terms of resources. And there'll be lots more stuff to come. So we do appreciate you time today. We know that everyone's very busy trying to address all these community needs that we talked about today. So we very much appreciate it. And thank you for attending.

(END)