Strategy: Address Homelessness in Your CDBG-DR Action Plan

HUD expects CDBG-DR Action Plans to address the impacts of the disaster on vulnerable populations, including people experiencing homelessness or at risk of homelessness. Perform the following steps to complete the necessary analysis, planning, and determination of funding for activities that will assist this population. **HUD might not approve action plans that do not adequately address the needs of persons experiencing homelessness both pre- and post-disaster.**

**Step 1. Understand the Requirements**

All CDBG-DR grantees are required to specifically address how its programs will promote housing for vulnerable populations including people experiencing homelessness or at risk of homelessness. (Consult the [Action Plan Review and Certification Checklist](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recoveryguide/) related to the disaster event for more information.)

- **Disaster and Unmet Needs Assessment (Needs Assessment).** To inform the Action Plan, the Needs Assessment must address housing including: interim and permanent; owner and rental; single family and multifamily; affordable and market rate; and housing to meet the needs of persons experiencing homelessness prior to the disaster.

- **Action Plan Activities.** The Action Plan must include descriptions of activities that address:
  - The transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are experiencing homelessness and at risk of homelessness;
  - The prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; and
  - The special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents).

In short, an Action Plan does not meet HUD’s standards if it does not include provisions for the housing and service needs of people experiencing or at risk of homelessness or if it only addresses short or intermediate needs.
Step 2. Include Homelessness in the Unmet Needs Assessment Section of Your Action Plan

The Disaster and Unmet Needs Assessment Kit in the CDBG-DR Toolkit provides a methodology for conducting the full analysis. To ensure that the needs of people experiencing homelessness are incorporated into this analysis, you must look beyond damage assessments and collect both quantitative and qualitative data about the numbers and characteristics of people in the community who were experiencing homelessness. Much of this data has likely been collected and analyzed by entities in your community already, including your CoC, city agencies, and local policy and advocacy groups. See this checklist for more information on collecting and analyzing data about homelessness in your needs assessment.

Step 3. Address Homelessness in the Funding Allocation Section of Your Action Plan

CDBG-DR funds allow a variety of eligible activities that can meet the needs of people experiencing or at risk of homelessness and per HUD guidance, these must be considered in your allocation of funds. Consider the following questions as you contemplate the activities you will fund:

- How can programs be designed to ensure households experiencing homelessness are aware of and have access to programs and services?
- What wrap-around services are needed to maximize each program’s success?
- How can key homeless concepts, such as Housing First, be embedded in all housing program designs?
- How can current homeless programs be adapted for a post-disaster environment?
- As disaster response programs ramp down, what are the effects on people experiencing homelessness and the existing programs that serve them?

See this checklist for a methodology and a detailed list of CDBG-DR eligible activities that can address homelessness.
Checklist: Ensure the Inclusion of Homelessness in the CDBG-DR Action Plan

The Action Plan must address homelessness in the unmet needs assessment and in the funding allocation sections.

UNMET NEEDS ASSESSMENT

The unmet needs assessment determines the needs that remain after the response effort. It informs your decisions about allocating limited CDBG-DR funding toward the areas of greatest need. To ensure that your unmet needs assessment includes the needs of people experiencing or at risk of homelessness, take the actions listed below.

Action 1. Assess the Current Situation

Collect and analyze data on the current situation. Most of this data can be collected from your CoC using data from the Homeless Management Information System (HMIS), your community’s last Point in Time (PIT) Count, your Consolidated Plan, and census data.

☐ Gather the pre-disaster baseline data. Access the data that was collected prior to the disaster on homelessness in your community. This will be helpful in assessing longstanding needs that require attention. Collect data on:
  • The scope and nature of homelessness in your community
  • Households at risk of homelessness
  • Housing stock and gaps in affordable housing
  • Support services for homelessness prior to the disaster

☐ Gather data on current conditions. Consult with emergency personnel and the CoC to gather qualitative and quantitative data on the impact of the disaster on people who were experiencing homelessness or at risk of homelessness prior to the disaster.

Data must include community input on how the disaster impacted households experiencing homelessness. Consider:
  • Where are people who were experiencing homelessness prior to the disaster being sheltered? In what conditions?
  • What is the status of pre-disaster arrangements? For example, are emergency shelters operational? Were encampments destroyed? Were temporary housing options such as motels impacted?
  • Have the numbers of people experiencing homelessness increased as people who were previously precariously housed have become homeless?
  • Have service providers seen a surge in need for shelter, food, services? Can they quantify that need?
Identify indirect impacts on persons experiencing homelessness or precariously housed. In gathering data about current conditions, consider the impacts of these conditions. Beyond loss of emergency shelters, what other impacts have people experiencing homelessness encountered? Consider:

- Impacts on health associated with loss of foodbanks, health clinics, substance abuse treatment, and other such services
- Loss of income associated with disruptions to employment caused by business losses or inaccessibility of work (loss of transportation or childcare)
- Loss of belongings, including identification and other crucial documents that can impact ability to access resources
- Instability created by loss of services, schools, and social networks

Consider the effects of ongoing response and recovery work. As you begin to analyze the data collected to inform your estimation of unmet needs, take stock of ancillary impacts of response efforts.

Consider how short-term recovery efforts have affected people who were experiencing homelessness and the service sector that supports them.

- Have disaster shelters alleviated a shortage of shelter space? What will happen when those shelters close?
- Have households experiencing homelessness fled to surrounding communities? To what degree are those households returning to the community?
- To what extent will emergency and social services remain and for how long?
- To what extent has the service network re-built its capacity? Are there still response initiatives in place that can help individuals with long-term recovery?

Identify Funding Sources. Assess the resources available to address the needs identified.

- Identify funding in the community being used to provide shelter or services to people experiencing homelessness.
- Identify additional sources of funding that could be allocated to meet these needs.

See Summary of Funding Sources for Housing and Services after a Disaster for a list of sources to consider.

Action 2. Estimate Unmet Needs

Use data collected and analyzed to determine and codify the needs of people experiencing homelessness that have not been met through other programs and interventions.

Calculate unmet needs. Identify service and housing needs not met by other funders. CDBG-DR allows grantees to establish programs that re-build in a resilient manner for future disasters. This gives the grantee latitude to identify broad needs that may not have been met before such as:

- Emergency shelters, food banks, medical services, and other services
- Permanent supportive housing, tenant assistance, and other housing supports

Summarize your analysis in the Needs Assessment section of your CDBG-DR Action Plan. Include descriptions of:

- The scope and nature of homelessness in your community pre-disaster and how that has changed post disaster.
- Affordable housing stock and the types and numbers of housing needed to achieve housing for all residents.
- Type and breadth of services needed to ensure that people experiencing homelessness and people at risk of homelessness have access to stable housing.
FUNDING ALLOCATION

The Funding Allocation section of the CDBG-DR Action Plan gives HUD and the public a high level overview of what programs and projects you plan to undertake with CDBG-DR funding. You will use the information collected in your Unmet Needs Assessment to determine local capacity, prioritize needs, and articulate a vision for the programs and projects that you want to fund with CDBG-DR funds.

**Action 3. Determine Capacity**

- **Identify your long-term post-disaster service network and stakeholders.** Consider those with specific skills in the areas needed to address the needs of people experiencing homelessness.
  - These may include your existing CoC, Voluntary Organizations Active in Disaster (VOADs), housing finance agencies, housing counseling agencies, and community health centers.
  - Work with these organizations to determine their interest in and capacity to support CDBG-DR program activities.

- **Consider their capacity to carry out long-term disaster programs.** Assess the depth, breadth, skills and availability of the stakeholders identified and consider what they need to meet the needs and potentially expand capacity. Consider:
  - Will they need to train existing staff, hire new staff, or develop new partnerships?
  - Will they need new IT systems? More space? Other investments?
  - What support – financial and skills-based – will they need from your agency to carry out an expanded mission and meet current needs?

**Action 4. Prioritize Needs and Develop Responses**

- **Develop programs and projects based on an unmet needs analysis with an emphasis on meeting the needs of those experiencing homelessness or those at risk of homelessness.** Determine how and how much CDBG-DR funding will be allocated to addressing unmet needs of those experiencing homelessness or at risk of homelessness.
  - Based on available capacity, unmet needs assessment, and strategic priorities for finite CDBG-DR funding, determine which programs and projects to fund.
  - Obtain feedback from impacted partners and localities to ensure that the proposed program or project will meet stated need.
  - For programs and projects that you can fund to address homelessness issues post disaster see Overview of CDBG-DR Programs for Homelessness.

- **Include descriptions of your homelessness programs and projects in the Funding Allocation section of your CDBG-DR Action Plan.** For all programs and projects you fund, your Action Plan must include high level overview of proposed activities, including:
  - Use of funding including proposed activity, budget, and geographic area
  - Entity administering program or project
  - Eligible CDBG-DR activity and national objective for the program or project
  - Threshold factors or applicant eligibility criteria, grant size limits, and proposed start and end dates
  - How the projected use of funding relates to a specific impact of the disaster and will result in long-term recovery
  - Estimated and quantifiable performance outcomes relative to the identified unmet need
## Overview of CDBG-DR Eligible Activities for Homelessness

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<thead>
<tr>
<th>Activity</th>
<th>Program Overview</th>
<th>Design Considerations for Post-Disaster Scenario</th>
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<tbody>
<tr>
<td><strong>PUBLIC SERVICES</strong></td>
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| **Tenant Based Rental Assistance (TBRA)** | Rental subsidy to help households afford housing costs such as rent and security deposits to make units affordable to low-income people following a disaster | • May require a waiver from HUD so the program can be funded for longer than the 3 months allowed under CDBG.  
• Can be used on its own or in conjunction with other activities such as rapid rehousing and rental development.  
• Rapid Rehousing can be used as a strategy combining TBRA along with case management services and rent and move-in assistance to help individuals and families move quickly into housing. This strategy can be adapted to a post-disaster market to help families displaced by the disaster regain their stability and avoid prolonged homelessness. |
| **Emergency Assistance Payments** | Similar to TBRA, can use CDBG-DR funding to help tenants remain in their homes by paying for utilities and related housing costs | • May require a waiver from HUD so the program can be funded for longer than the 3 months allowed under CDBG.  
• Applicants are likely to need support throughout the process.  
• Quick ramp up is imperative.  
• Marketing to landlords won’t ensure the homeless community is aware of the program: additional outreach will be required. |
| **Housing Counseling**        | Assist with housing search and identification of permanent affordable housing alternatives | • Typical housing counseling services, such as homebuyer or foreclosure prevention, can be greatly expanded post disaster such as coordinating with case management agencies, recognizing and avoiding scams, connecting individuals to and applying for relief efforts, etc.  
• Ensuring strong connections between counseling agencies with homeless providers may afford the opportunity for more intensive and long-term engagement with households, and allow agencies to act more like case management for housing issues than typical housing counseling tied to a single transaction. |
<p>| <strong>Job Training</strong>              | Help individuals gain the skills necessary to obtain employment                   | • Can be paired with recovery programs to provide job opportunities for unemployed and underemployed. |
| <strong>Childcare</strong>                 | Cover child care expenses that may prevent individuals from obtaining employment and going to work | • Individuals may not be able to pay for childcare services or may not have access to the same childcare services available to them prior to the disaster. |
| <strong>Healthcare</strong>                | Cover healthcare related expenses                                                | • Individuals may not have access to the same healthcare services available to them prior to the disaster and healthcare conditions may be exacerbated by the disaster event. |</p>
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<tr>
<td>Drug abuse counseling and treatment</td>
<td>Address need for counseling and treatment</td>
<td>• Drug abuse may increase after a disaster due to trauma. CDBG-DR funds can be used to pay for substance abuse services including counseling and treatment.</td>
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<tr>
<td>Case Management</td>
<td>Provide full spectrum of case management services to help individuals gain access to jobs, housing, and associated services</td>
<td>• After a disaster, long-term case management for individuals and households experiencing homelessness is imperative to help navigate the various housing options and relief services, referrals to entities that can support trauma-induced issues, and connecting back to the CoC network.</td>
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<td>• Most disaster projects and programs will need a case management or housing counseling element to ensure accessibility by the homeless community.</td>
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<td>• Rapid Rehousing can be used as a strategy combining case management services with Tenant Based Rental Assistance. This strategy can be adapted to a post-disaster market to help families displaced by the disaster regain their stability and avoid prolonged homelessness.</td>
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**PUBLIC FACILITIES**  
*Must be owned and operated by local government or nonprofit (Eligible Activity: Section 105(a)(2), National Objective: LMI Limited Clientele, LMI Area Benefit, Urgent Need)*

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<tr>
<th>Emergency Shelter</th>
<th>Establish shelters to serve as overnight residences for households experiencing homelessness</th>
<th>• After a disaster there may be a need to repair existing emergency shelters, expand them, or build new ones. CDBG-DR funds can be used to pay for these activities.</th>
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<tr>
<td>Disaster Shelter</td>
<td>Establish shelters to serve households that lost their homes due to disaster until they can find alternative housing or repair their damaged housing</td>
<td>• Investments of CDBG-DR funds in disaster shelter can relieve pressure on the community’s emergency shelter system.</td>
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<td>• Disaster shelters must have clear exit strategies for individuals and households experiencing homelessness to support the transition to permanent housing.</td>
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<td>Transitional Housing</td>
<td>Provide temporary housing for households who may need additional stabilization supports before moving into permanent housing.</td>
<td>• Transitional housing can be most effective for survivors of domestic violence; unaccompanied youth, including pregnant or parenting youth; or individuals in early recovery from a substance use disorder who may desire more intensive supports.</td>
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**RENTAL HOUSING**  
*Can be developed to alleviate housing needs post disaster. Does not have to be a one for one replacement of damaged units. (Eligible Activity: Acquisition of real property, Section 105(a)(1) or Clearance, rehabilitation, reconstruction, and construction of buildings (Including housing), Section 105(a)(4), National Objective: LMI Housing)*

<p>| Acquisition of rental housing     | Acquire existing rental housing that can be converted into housing units for low- and moderate-income households                                                                                                                                                     | • Homeless Preference can be used in existing or new rental developments to ensure that units that become available in the competitive post-disaster housing market are accessible to people experiencing homelessness. |
| Rental housing construction and/or rehabilitation | Construction or rehabilitation of rental housing for low and moderate-income households that can replace damaged rental housing stock and get                                                                 | • Housing First approach shall be deployed to minimize the barriers for households and individuals experiencing homelessness in accessing these housing options.                                                                                           |</p>
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| Permanent Supportive    | Construction or rehabilitation of affordable housing offered in combination with supportive services | • This helps serve low-income populations that also have co-existing complex needs such as physical disabilities, mental health, and/or drug addiction issues.  
• Similar to other types of rental housing programs, Homeless Preference can be used to ensure that units that become available in the competitive post-disaster housing market are accessible to people experiencing homelessness. |
| Housing                  |                                                                                   |                                                                                                                                                                                                                                                |
| Rapid Re-Housing         | A model of permanent housing that provides short- and/or medium-term rental assistance and supportive services to help individuals and families achieve and maintain housing stability as quickly as possible | • Rapid re-housing helps homeless individuals and families solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time the experience homelessness. CDBG-DR funds may be used to pay for rental assistance, services, and other costs to rapidly re-house individuals or families after disasters. |