

A. EXECUTIVE SUMMARY

The City of Greensboro's federal Five-Year Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) for the period of 2015-2019. The Annual Action Plan details each year within the Five-Year Consolidated Plan and outlines the implementation of annual funding, which is developed through public input, analyses, and planning. The Greensboro City Council adopted the 2019-2020 Annual Action Plan (Annual Plan) on May 21, 2019 and submitted the document to the U.S. Department of Housing and Urban Development (HUD) before the required deadline date.

The City's Citizen Participation Plan (CPP) describes the efforts that the City will take to encourage its residents to participate in developing these plans. It also provides requirements for public process when a "substantial amendment" to the Annual Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the CPP:

- A change in the use of CDBG funds from one eligible activity to another
- Funding of a new project not previously described in the Annual Plan
- A change in the allocation or distribution of funds
 - Defined as when the dollar amount of that change is equal to, or greater than 25% of the City's current fiscal year federal allocation
 - E.g. CDBG is undergoing a substantial change when 25% or more of that year's CDBG allocation is affected
- A significant change to an activity's proposed beneficiaries or persons served

HUD has allocated special funds to the City of Greensboro, as authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19).

Due to COVID-19, HUD has issued guidance that waives the Citizen Participation Plan requirements for entitlement recipients, provided that (1) no fewer than five days are provided for public comment and that (2) reasonable notice and the opportunity to comment is provided. HUD has awarded supplemental funding through the CARES Act that requires programming in the 2019-2020 Annual Action Plan.

The first Substantial Amendment to the 2019-2020 Annual Action Plan to program and authorize \$2,082,964 in CDBG-CV, ESG-CV, and HOPWA-CV funds under the CARES Act was approved by City Council on May 19, 2020 and submitted to HUD. This second Substantial Amendment to the 2019-2020 Annual Plan is to program and authorize \$1,880,847 in additional ESG-CV funds awarded to the City of Greensboro. This additional ESG-CV award brings the total awarded Greensboro CARES Act dollars to \$3,963,811.

B. CITIZEN PARTICIPATION

An eight-day public comment period was published in the *Greensboro News & Record*, *Carolina Peacemaker*, and *Qué Pasa* and posted on the City website, informing the public of the proposed Substantial Amendment and inviting comments. The public comment period will begin on Wednesday July 29, 2020 and will end on Wednesday August 5, 2020. Residents are able to review copies of the Substantial Amendment at www.greensboro-nc.gov/substantialamendment or may request a hard copy

if needed. On August 18, 2020, the Greensboro City Council will approve the submission of the substantial amendment and the CARES Act program funding.

C. CHANGES TO THE 2019-2020 ANNUAL ACTION PLAN

The City is proposing the following amendments to the 2019-2020 Annual Action Plan in order to allocate additional supplemental funding awarded by the CARES Act.

1. Program and authorize \$1,880,847 in ESG-CV funding made available by the CARES Act to provide homelessness prevention, rapid rehousing services, and emergency shelter.

In the event that the forthcoming federal ESG-CV notice provides flexibility for funding new eligible activities, we anticipate the possibility of allocating the balance of any uncommitted ESG-CV funds to new activities based on local needs. Emergency shelter and additional rapid rehousing activities will be considered within 180 days of the date of the HUD grant agreement for Round II ESG-CV funds.

The following Table outlines the project budgets that are being modified to allocate funds to the proposed projects described in this Substantial Amendment:

Table 1: Proposed Activity Budget Modifications and Reprogrammed Project Budgets

Program Year/ Project Title	Existing Budget	New Budget	Difference
<i>Increase Funding/Programming</i>			
FY 19/20 ESG-CV	\$675,621	\$2,556,468	\$1,880,847
Subtotal			\$1,880,847

D. PUBLIC COMMENTS

The City of Greensboro is providing notice of an eight-day public comment period as part of the HUD public participation exemption process. The documents are available on the Neighborhood Development website at www.greensboro-nc.gov/substantialamendment.

Comments may be provided to Caitlin Bowers by email (Caitlin.Bowers@greensboro-nc.gov), phone (336-433-7266), or in writing addressed to:

ATTN: Caitlin Bowers
 City of Greensboro
 Neighborhood Development Department
 PO Box 3136
 Greensboro, NC 27402

All public comments received during the eight-day public comment period will be incorporated into the overall Substantial Amendment submitted to HUD.

E. 2019-2020 PROPOSED ACTIVITY DETAIL

Amend the projects in section AP-38 Project Summary, as follows (*additions*):

Table 2: AP-38 Project Summary Information

10	Project Name	FY 19/20 – ESG-CARES
	Target Area	N/A
	Goals Supported	Promote a Suitable Living Environment
	Needs Addressed	Homelessness Services
	Funding	ESG-CV: \$675,621 ; <i>\$2,556,468</i>
	Description	<p>Rapid rehousing – provide case management services, deposit/rental assistance, and other eligible services as needed to keep individuals and families from experiencing homelessness due to the COVID-19 emergency;</p> <p><i>Homelessness prevention – provide housing relocation and stabilization services to keep individuals and families from experiencing homelessness due to the COVID-19 emergency;</i></p> <p><i>In the event that the forthcoming federal ESG-CV notice provides flexibility for funding new eligible activities, we anticipate the possibility of allocating the balance of any uncommitted ESG-CV funds to new activities based on local needs. Emergency shelter and additional rapid rehousing activities will be considered within 180 days of the date of the HUD grant agreement for Round II ESG-CV funds.</i></p>
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	<i>680 extremely low-income households served.</i>
	Location Description	Citywide
Planned Activities	Rapid rehousing, <i>Homelessness Prevention</i>	

**City of Greensboro Second Substantial Amendment to the
2019-2020 Annual Action Plan**

Summary of Citizen Participation Comments

*Public Comment Period on the proposed
Second Substantial Amendment to the 2019-2020 Annual Action Plan
July 29, 2020 – August 5, 2020*

Five (5) public comments submitted via voicemail and email to Caitlin Bowers, community development analyst, are summarized below.

Comment #1 (*transcribed voicemail; original can be made available*) –

Submitter: Candace Mayo, resident

July 29, 2020

Resident disagrees with proposed uses:

“...because CARES Act was enacted to help people without insurance for COVID testing and should not be used for government housing. I don’t agree with City Council thinking it’s okay to pay for people’s housing when it should be used strictly for Coronavirus testing for those without insurance. That is my feeling on it. I do not agree that it should be used for assistance for rent because people can work. Those that are not able to work should have enough money to pay for Coronavirus testing if they feel like they have the virus in their system.”

Greensboro Response: The US Department of Housing and Urban Development (HUD) awarded the City of Greensboro Emergency Solutions Grants (ESG) Program funds authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. These special ESG-CV funds are to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. President Trump signed the CARES Act on March 27, 2020 to help the Nation respond to the coronavirus outbreak.

Comment #2 –

Submitter: Glenn Turgeon, resident

July 31, 2020

“I’m suggesting added assistance to those of us who are not yet homeless but could be at any moment. Direct assistance to my landlord, Duke Energy and Piedmont Natural Gas is available thru LIEAP but not nearly enough. Maybe a 50% assistance for a fiscal year”

Greensboro Response: The City of Greensboro is allocating the full \$3,963,811 of CARES Act funds (\$2,082,964 under the First Substantial Amendment; \$1,880,847 under this Second Substantial Amendment) to public services such as emergency grant payments, rapid rehousing, shelter operations, and homelessness prevention for the purpose of preventing, preparing for, and responding to Coronavirus. In the event that the forthcoming federal ESG-CV notice provides flexibility for funding new eligible activities, we anticipate the possibility of allocating the balance of any uncommitted ESG-CV funds to new activities based on local needs. Emergency shelter and additional rapid rehousing activities will be considered within 180 days of the date of the HUD grant agreement for this current ESG-CV award under the Second Substantial Amendment to the 2019-2020 Annual Action Plan.

Comment #3 –

Submitter: Jacquelynn Inyama, resident

August 5, 2020

“I am overwhelmed by the increase in funds regarding the rapid rehousing initiative. I am very supportive of this endeavor regarding assisting the homeless here in Greensboro. I thought that if we could put the amount of money into the building of LeBauer park (over \$10 million, I think) why is it that we cannot do something to assist the homeless living in the street, who get kicked out of the park at dusk.

I think homelessness in this country is an outrage, and I am very proud of my home, Greensboro NC for moving forward to address this situation. Thank you!”

Greensboro Response: The Greensboro Neighborhood Development Department will continue to work and partner with community service providers to carry out activities and meet the needs of Greensboro residents.

Comment #4 –

Submitter: Bernita Sims; Executive Director, Welfare Reform Liaison Project, Inc.

August 5, 2020

“I think that the purposing of these funds is necessary due to COVID-19 and that individuals and families will be in need of these funds to remain stable and to secure housing. How will these funds be allocated and to what organizations? Will organizations not normally funded by the City have the ability to apply?”

Thank you for the work that the City of Greensboro does to assist families in need.”

Greensboro Response: In order to issue the ESG-CV funds and provide services in the most expedient manner, the Greensboro Neighborhood Development Department is allocating these funds consistent with the 2019 and 2020 Homelessness Prevention Request for Proposals (RFP) processes. The awarded organizations have previously been identified with the capacity and experience to carry out the needed public services. The organizations awarded funding for homelessness prevention per this Second Substantial Amendment to the 2019-2020 Annual Action Plan and as approved at the August 18, 2020 City Council meeting are: Greensboro Urban Ministry, Greensboro Housing Coalition, and Salvation Army of Greensboro. Eligible organizations are encouraged to participate in the annual RFP processes made available at www.greensboro-nc.gov/NeighborhoodDevelopment.

Comment #5 –

Submitter: Jenise Abdul-Razzaaq, independent contractor

August 5, 2020

“With the occurrence of a global pandemic, as you know, Covid-19 requires social distancing, washing hands frequently and wearing masks. Therefore, the current response to homelessness would require changes to be made.

My comments are the temporary shelter housing would be individual apartments or like hotel suites with bathroom, 1 bedroom, and a modified kitchen. The property could have the look of a apartment complex with a larger building that would have offices and classrooms for case management, homelessness prevention, rapid rehousing services, and mental health services that would include trauma informed therapy, family preservation services and support groups. Included in this building would be showers and bathrooms for chronic homeless individuals to access.

Covid-19 has impacted people across all socioeconomic and racial backgrounds. There are families experiencing homelessness for the first time.

Unfortunately, there is a great amount of stigma that comes along with homelessness. Public bathrooms, libraries and restaurants that were accessible are currently unavailable. I understand 2 million dollars is not enough to address all the needs of homelessness but I believe it can be a start to a strong impact.

Thank you for the opportunity to express my comments regarding this project.”

Greensboro Response: The City of Greensboro, in partnership with local agencies and Cone Health, created non-congregate shelter for individuals and households experiencing street homelessness, in the form of hotel/motel assistance. Since March 2020, this assistance has been provided to over 180 households, with the goal to assist in social distancing, and preventing COVID-19 for this high risk population. CARES Act funds have been used for homelessness prevention, rapid re-housing and hotel assistance, to ensure that the most vulnerable have the ability to protect themselves and their families, and to prevent the spread of the virus. In the event that the forthcoming federal ESG-CV notice provides flexibility for funding new eligible activities, we anticipate the possibility of allocating the balance of any uncommitted ESG-CV funds to new activities based on local needs. Emergency shelter and additional rapid rehousing activities will be considered within 180 days of the date of the HUD grant agreement for this current ESG-CV award under the Second Substantial Amendment to the 2019-2020 Annual Action Plan.