



CDBG-CV: Emergency CARES Act Funding

The information on this page is sourced from guidance provided by federal agencies and COHHIO's national advocacy partners.

Parameters for using CDBG for Rental Assistance

The recently passed Coronavirus Assistance, Relief and Economic Security (CARES) Act allocates \$5 billion to a special round of funding under the Community Development Block Grant program. The funding, referred to as CDBG-CV, can be allocated for components of the pandemic response. Most notably, the dollars can be used to cover up to three months of rental or mortgage assistance. Program managers are encouraged to plan their expenditures to prevent CDBG-CV from covering a cost that could be paid for by another revenue stream.

There are four broad requirements for the use of CDBG-CV funds:

1. Funding is directed toward serving populations earning low-to-moderate incomes. (This equates to 80 percent of the area median income or under household incomes of \$48,800 in Ohio.)
2. Expenditure is necessary due to the pandemic.
3. The item was not included in the last budget.
4. Funds are expended by September 30, 2022.

HUD has also eliminated the 15 percent public services cap typically used in the CDBG program. The change impacts all CDBG funds for FY 2019 and FY 2020 as well as CDBG-CV. The adjustment allows jurisdictions to direct a larger portion of their allocations to nonprofits and for rental assistance. In order to help jurisdictions make changes to their FY 2019 and FY 2020 consolidated plans, HUD has eased public notice requirements for amendments to five days.

HUD specifies that jurisdictions can obtain money faster if they add eligible COVID-19 expenses as a substantial amendment to their FY 2019 action plans. Plan deadlines have been extended to August 16, 2021.¹

Recommended uses for Supportive Housing and Homeless Response²

Where possible, service providers are reminded to strategically use resources. For instance, some costs such as acquisition/rehab of hotels/motels and social distancing within non-congregate settings might be covered under FEMA. Additional information regarding reimbursements from FEMA and the Ohio Emergency Management Agency can be found at www.cohhio.org.

- Short-term
 - Capital for acquisition/rehab of hotels/motels to isolate individuals with mild symptoms/ in recovery from COVID-19

¹ John Gibbs, HUD Acting Assistant Secretary for Community Planning and Development, in an April 29, 2020, webinar hosted by Enterprise Community Partners. <https://www.enterprisecommunity.org/resources/how-communities-can-usecdbg-funds-address-covid-19-10408>

² Corporation for Supportive Housing. CARES Act Eligibility and Recommended Uses for States and Local Jurisdictions. April 2020. <https://d155kunxf1aozz.cloudfront.net/wp-content/uploads/2020/04/CSH-CARES-Act-Funding-Overview-forHomeless-and-Housing.pdf>

- Deliver meals to seniors, individuals / families experiencing homelessness, in non-congregate setting, or who recently experienced homelessness now living in permanent housing
- Funding for improvements to affordable/ supportive housing properties to allow quarantining/ distancing on-site on a temporary basis
- Protective equipment, supplies, and materials for COVID-19 purposes
- Funding to establish a testing site at a shelter, encampment, supportive housing development (fixed or mobile location)
- Funding to establish data collection systems to track racial disparities in outbreak and response to COVID-19
- Medium/Long-term
 - Rental assistance and eviction prevention funds delivered directly to providers supporting individuals and families experiencing homelessness or at imminent risk of homelessness
 - Operating support to boost payments to affordable & supportive housing developers to make up for shortfalls in rent due to lost wages from tenants that are not otherwise covered by CARES Act Housing Choice Voucher funding
 - Installation of broadband infrastructure at supportive housing sites for the purpose of connecting individuals to jobs, education, healthcare providers/telehealth, and to help prepare for and respond to natural disaster/ emergencies³
 - Funding to states to local jurisdictions for technical assistance to first-time CDBG recipients
 - Development of a healthcare facility for supportive housing residents for ongoing testing, treatment, and diagnosis
 - Funding to maintain data collection systems, analyze data on disparities in outbreak and response to COVID-19, and develop response plan.
 - Funding to conduct an analysis of impediments to fair housing choices and develop a plan for more equitable access to housing and resources.

Advocate for Increased Rental Assistance

Affordable housing advocates should encourage state and local policymakers to designate CDBG-CV funds for rental assistance and eviction prevention efforts. Cities across the country that have committed resources to rental assistance include [Baltimore](#), [Cleveland](#), [Philadelphia](#) and [Seattle](#).

Providers might consider communicating COVID-19's impact on housing insecurity to local and state officials by using the techniques outlined below:

- Suggest how rental assistance and eviction prevention could ease demand for homeless services. One study found rental assistance reduced homelessness rates by 75 percent.⁴
- Engage both landlords and tenants in local advocacy efforts. Rental assistance could help landlords avoid losses connected to high rates of rent non-payment while helping tenants avoid eviction. The assistance would also stabilize the rental housing market and help tenants manage other financial demands.
- Inform policymakers that more than 630,000 Ohio renters were laid off between mid-March and the end of April. They will collectively owe more than \$500 million in rent each month.⁵
- Highlight eviction prevention as a public health issue: Safe housing supports social-distancing and lessens crowding in homeless shelters.

³ Broadband installation must meet a "national objective" as per the CDBG regulation. Consultation with the local HUD Field Office is recommended. More information available: <https://www.hudexchange.info/onecpd/assets/File/CDBG-Public-Facilities-Improvements-Introduction-Transcript.pdf>

⁴ Wood, Michelle, Jennifer Turnham, and Gregory Mills. "Housing affordability and family well-being: Results from the housing voucher evaluation." Housing Policy Debate 19, no. 2 (2008): 367-412. <https://doi.org/10.1080/10511482.2008.9521639>

⁵ Caniglia, M. On Edge. Coalition on Homelessness and Housing in Ohio. May 1, 2020. https://cohio.org/wp-content/uploads/2020/04/On-Edge-analysis.pdf?link_id=1&can_id=8c2bc9e5fbf7029ed3f00d7c4cf6d3b8&source=email-for-immediaterelease-ohio-tenants-and-landlords-unite-behind-emergency-rental-assistance-proposal&email_referrer=&email_subject=for-immediaterelease-ohio-tenants-and-landlords-unite-behind-emergency-rental-assistance-proposal

HUD Quick Guide to CDBG Eligible Activities to Support Coronavirus and Other Infectious Disease Response⁶

Revised: April 6, 2020

Grantees should coordinate with local health authorities before undertaking any activity to support state or local pandemic response. Grantees may use Community Development Block Grant (CDBG) funds for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus.

Examples of Eligible Activities to Support Coronavirus and Other Infectious Disease Response

Buildings and Improvements, Including Public Facilities	
Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. <i>See section 105(a)(2) (42 U.S.C. 5305(a)(2)); 24 CFR 570.201(c).</i>	Construct a facility for testing, diagnosis, or treatment.
	Rehabilitate a community facility to establish an infectious disease treatment clinic.
	Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.
Rehabilitation of buildings and improvements (including interim assistance). <i>See section 105(a)(4) (42 U.S.C. 5305(a)(4)); 24 CFR 570.201(f); 570.202(b).</i>	Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system.
	Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery.
	Make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis.
Assistance to Businesses, including Special Economic Development Assistance	
Provision of assistance to private, for-profit entities, when appropriate to carry out an economic development project. <i>See section 105(a)(17) (42 U.S.C. 5305(a)(17)); 24 CFR 570.203(b).</i>	Provide grants or loans to support new businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease.
	Avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons.
Provision of assistance to microenterprises. <i>See section 105(a)(22) (42 U.S.C. 5305(a)(22)); 24 CFR 570.201(o).</i>	Provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine.

⁶ For direct link please see <https://files.hudexchange.info/resources/documents/Quick-Guide-CDBG-Infectious-DiseaseResponse.pdf>.

Provision of New or Quantifiably Increased Public Services	
Following enactment of the CARES Act ¹ , the public services cap ² has no effect on CDBG-CV grants and no effect on FY 2019 and 2020 CDBG grant funds used for coronavirus efforts. <i>See section 105(a)(8) (42 U.S.C. 5305(a)(8)); 24 CFR 570.201(e).</i>	Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
	Provide testing, diagnosis or other services at a fixed or mobile location.
	Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.
	Provide equipment, supplies, and materials necessary to carry-out a public service.
	Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.
Planning, Capacity Building, and Technical Assistance	
States only: planning grants and planning only grants. <i>See section 105(a)(12).</i>	Grant funds to units of general local government may be used for planning activities in conjunction with an activity, they may also be used for planning only as an activity. These activities must meet or demonstrate that they would meet a national objective. These activities are subject to the State's 20 percent administration, planning and technical assistance cap.
States only: use a part of to support TA and capacity building. <i>See section 106(d)(5) (42 U.S.C. 5306(d)(5)).</i>	Grant funds to units of general local government to hire technical assistance providers to deliver CDBG training to new subrecipients and local government departments that are administering CDBG funds for the first time to assist with infectious disease response. This activity is subject to the State's 3 percent administration, planning and technical assistance cap.
Entitlement only: data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans. <i>See 24 CFR 570.205.</i>	Gather data and develop non-project specific emergency infectious disease response plans.

Planning Considerations

Infectious disease response conditions rapidly evolve and may require changes to the planned use of funds:

- CDBG grantees must amend their Consolidated Annual Action Plan (Con Plan) when there is a change to the allocation priorities or method of distribution of funds; an addition of an activity not described in the plan; or a change to the purpose, scope, location, or beneficiaries of an activity.
- If the changes meet the criteria for a “substantial amendment” in the grantee’s citizen participation plan, the grantee must follow its citizen participation process for amendments.
- Under the CARES Act, CDBG grantees may amend citizen participation and Con Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days.

Resources

HUD has technical assistance providers that may be available to assist grantees in their implementation of CDBG funds for activities to prevent or respond to the spread of infectious disease. Please contact your local CPD Field Office Director to request technical assistance from HUD staff or a TA provider.

- Submit your questions to: CPDQuestionsAnswered@hud.gov
- Coronavirus (COVID-19) Information and Resources: <https://www.hud.gov/coronavirus>
- CPD Program Guidance and Training: <https://www.hudexchange.info/program-support/>

HUD CARES Act Funding by Ohio Entitlement Area				
NAME	CDBG-CV1	CDBG-CV2	ESG20-CV1*	HOPWA20-CV
Akron	\$ 3,619,581.00	\$ -	\$ 1,840,393.00	\$ -
Alliance	\$ 367,100.00	\$ -	\$ -	\$ -
Barberton	\$ 386,869.00	\$ -	\$ -	\$ -
Bowling Green	\$ 179,913.00	\$ -	\$ -	\$ -
Canton	\$ 1,566,461.00	\$ -	\$ 783,834.00	\$ -
Cincinnati	\$ 6,881,355.00	\$ -	\$ 3,495,228.00	\$ 166,072.00
Cleveland	\$ 12,777,258.00	\$ -	\$ 6,409,548.00	\$ 229,922.00
Cleveland Heights	\$ 956,215.00	\$ -	\$ -	\$ -
Columbus	\$ 4,388,525.00	\$ -	\$ 2,150,555.00	\$ 205,452.00
Cuyahoga Falls	\$ 394,954.00	\$ -	\$ -	\$ -
Dayton	\$ 3,471,659.00	\$ -	\$ 1,745,634.00	\$ 70,253.00
East Cleveland	\$ 657,684.00	\$ -	\$ -	\$ -
Elyria	\$ 439,110.00	\$ -	\$ -	\$ -
Euclid	\$ 617,569.00	\$ -	\$ -	\$ -
Fairborn	\$ 162,642.00	\$ -	\$ -	\$ -
Hamilton City	\$ 855,817.00	\$ -	\$ -	\$ -
Kent	\$ 178,696.00	\$ -	\$ -	\$ -
Kettering	\$ 334,921.00	\$ -	\$ -	\$ -
Lakewood	\$ 1,186,886.00	\$ -	\$ 601,062.00	\$ -
Lancaster	\$ 296,742.00	\$ -	\$ -	\$ -
Lima	\$ 629,388.00	\$ -	\$ -	\$ -
Lorain	\$ 725,720.00	\$ -	\$ -	\$ -
Mansfield	\$ 514,410.00	\$ -	\$ -	\$ -
Marietta	\$ 242,989.00	\$ -	\$ -	\$ -
Massillon	\$ 392,232.00	\$ -	\$ -	\$ -
Mentor	\$ 94,411.00	\$ -	\$ -	\$ -
Middletown	\$ 431,289.00	\$ -	\$ -	\$ -
Newark	\$ 433,410.00	\$ -	\$ -	\$ -
Parma	\$ 572,218.00	\$ -	\$ -	\$ -
Sandusky	\$ 437,328.00	\$ -	\$ -	\$ -
Springfield	\$ 1,116,973.00	\$ -	\$ 560,655.00	\$ -
Steubenville	\$ 365,667.00	\$ -	\$ -	\$ -
Toledo	\$ 4,453,360.00	\$ -	\$ 2,249,248.00	\$ -
Warren	\$ 702,138.00	\$ -	\$ -	\$ -
Youngstown	\$ 2,091,689.00	\$ -	\$ 1,062,917.00	\$ -
Butler County	\$ 739,290.00	\$ -	\$ -	\$ -
Clermont County	\$ 573,023.00	\$ -	\$ -	\$ -
Cuyahoga County	\$ 2,432,345.00	\$ -	\$ 1,204,362.00	\$ -
Franklin County	\$ 1,200,795.00	\$ -	\$ 595,590.00	\$ -
Hamilton County	\$ 2,003,730.00	\$ -	\$ 1,009,176.00	\$ -
Lake County	\$ 822,275.00	\$ -	\$ -	\$ -
Montgomery County	\$ 1,160,651.00	\$ -	\$ 584,510.00	\$ -
Stark County	\$ 803,098.00	\$ -	\$ -	\$ -
Summit County	\$ 567,622.00	\$ -	\$ -	\$ -
Warren County	\$ 436,054.00	\$ -	\$ -	\$ -
Ohio Nonentitlement	\$ 27,257,013.00	\$ 37,436,106.00	\$ 21,324,293.00	\$ 238,430.00
Ohio Total	\$ 90,919,075.00	\$ 37,436,106.00	\$ 45,617,005.00	\$ 910,129.00

*Please note that there will be a second round of ESG funding, but the grant amounts are uncertain.