

2020 CDBG-CV SUBSTANTIAL AMENDMENT TO THE 2019 CONSOLIDATED PLAN COUNTY OF GLOUCESTER

Substantial Amendment to the 2019 CDBG Action Plan (September 1, 2019 – August 31, 2020)

This document serves as the First Substantial Amendment to the Annual Action Plan published previously in July 2019 and authorized for to submission to the U.S. Department of Housing and Urban Development by the County of Gloucester. The 2019 Annual Action Plan award represented \$1,347,415 CDBG funds, and \$573,217 Home Investment Partnership. This Substantial Amendment to the County of Gloucester 2019 Action Plan is due to The Coronavirus Aid, Relief and Economic Security Act (CARES Act) Public Law. This law made available \$5 billion in supplemental Community Development Block Grant (CDBG) funding for grants to prevent, prepare for, and respond to coronavirus (CDBG-CV grants). Additionally, the CARES Act provides CDBG grantees with flexibilities that make it easier to use CDBG-CV grants and fiscal years 2019 and 2020 CDBG Grants for coronavirus response and authorizes HUD to grant waivers and alternative requirements.

The County of Gloucester has received an allocation of \$804,857 under CDBG-CV funding as an available resource which will be applied to the 2019 Annual Action Plan. Distributions of line items for the funding will be amended upon guidance from the Department of Housing and Urban Development.

Grantees have been advised to amend or prepare their plans as soon as possible and not to wait for the pending Federal Register notice, which may provide additional waivers and alternative requirements. Similarly, grantees have been advised not to wait for HUD to allocate the remaining nearly \$3 billion of the \$5 billion provided by the CARES Act for the CDBG program. Upon publication of the Federal Register notice and subsequent allocations, the County of Gloucester will then amend its Action Plan accordingly.

HUD has advised Grantees that they should proceed with all amendments and plans under these new provisions by adding the CDBG-CV allocation in their plans as an available resource for the 2019 fiscal year. The CARES Act permits HUD to waive, or specify alternative requirements for, any provision of any statute or regulation that the Secretary administers in connection with the CDBG-CV funds, FY2019 and FY2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment), upon a finding by the Secretary that any such waivers or alternative requirements are necessary to expedite or facilitate the use of such amounts to prevent, prepare for, and respond to coronavirus.

To expedite grantees' use of CDBG-CV funds, HUD is waiving the requirements at 42 U.S.C. 12705(a)(2) to the extent it requires updates to the housing and homeless needs assessment, housing market analysis, and strategic plan and 24 CFR 91.220 and 91.320 to the extent the action plan is limited to a specific program year to permit grantees to prepare substantial

amendments to their most recent annual action plan, including their 2019 annual Action Plan. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for, and respond to coronavirus.

Allocation of CDBG–CV funds:

The County of Gloucester will designate the \$804,857 award of CDBG-CV funds accordingly until and if further notices are received to the following services:

Funds to Award - Distribution to Activities

Distribution to Activities - CDBG-CV Funding Table Grant Activities	National Objective	Entities: Municipalities /Non-Profits/Private For Profit Business	Maximum Grant Award	Number of Projects
Assistance to Businesses, Special Economic Development	LM	\$100,000	\$5,000	20
Public Services	LM/UR	\$674,857	\$10,000-\$50,000	8-10
Administration	N/A	\$30,000	N/A	
Total Funding		\$804,857		38

70% of the funding, \$563,400 must meet the L/M National Objective.

L/M = Low and Moderate-Income People, UR = Urgent Need

County reserves the right to move funds between budget/funding categories outlined above in this Plan Amendment, (budget in the award letter, or grant agreement) based on demand for assistance. The County may consider funding additional projects after awards are made should additional funds be recaptured, or be allocated from HUD.

Waivers and Alternative Requirements

- 1.) Public Service Activities – CDBG public service funding cap of 15 percent is waived.
- 2.) Reimbursement of Costs - Eligible costs for approved activities are eligible for reimbursement back to January 22, 2020.
- 3.) Citizen Participation – Public hearings, including teleconferencing must provide at least a 5-day public comment period on projects proposed for CDBG-CV funding.

Note: HUD has provided the above waivers with the CDBG-CV award. However, more waivers and alternative requirements may be granted through a forthcoming Federal Register Notice.

Special Requirements

Other Sources of Funding: Assess the availability of other sources of funding first, such as, US Department of Health, FEMA and US Treasury before applying for CDBG funding.

Duplication of Benefits Prohibition:

A duplication of benefit occurs when funding is provided for the same costs paid by another source, including private insurance, and the total amount received exceeds the total need for those costs. The grant agreement will require Grantees to report all sources of funds received, anticipated and received after implementation of the funded activity. Each grant activity will be required to complete a duplication of benefits analysis prior to the disbursement of the final payment. Any amount found to exceed the total amount needed for the activity will be returned and reallocated to open project(s) with need or will be returned to the Program's fund.

CDBG Program Requirements

All of the standard CDBG Program requirements will apply to the CDBG-CV Funding. Refer to the Gloucester County website at <http://www.gloucestercountynj.gov/depts/p/pw/planning/hcdev/default.asp> for more information.