



City of Benton Harbor

Department of Community & Economic Development

2019 CV-3 Action Plan Amendments and

Citizen Participation Plan

In Response to COVID19

City of Benton Harbor
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The following information address the areas of the Citizen Participation Plan and 2019 Action Plan amended in response to the Coronavirus Pandemic (COVID19)

In compliance with HUD Memo, issued April 9, 2020, amendments to the approved Citizen Participation Plan and Action Plan were limited to the following sections:

CITIZEN PARTICIPATION PLAN

Citizen Participation narrative addition: Citizen Participation requires Reasonable Notice and Opportunity to Comment. HUD recognizes the efforts to contain COVID19 requires limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID19. Therefore, HUD waives 24CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances. The city constitutes a public meeting as a public hearing that may take place in a physical location, virtual web meeting or teleconference. This authority is in effect through the end of the 2020 program year and the beginning of the 2021 fiscal year.

Availability of waivers of Community & Economic Development Department Grant Program and Consolidated Plan Requirements to prevent the spread of COVID19 and mitigate economic impacts caused by COVID19. This 30 day minimum is for the required public comment period is waived for substantial amendments, provided that no fewer than 3 days are provided for public comments on each substantial amendment. The waiver is available through the recipients 2020 program year and thereafter as long as CV funding remains available and is amended throughout the Citizen Participation Plan.

Any comments received, either at the virtual public hearing or during the public comment period will be considered by the City before the final amended action plan is submitted to HUD. A summary of the comments and agency's responses will be an attachment to the final amended action plan.

This amended Citizen Participation Plan will itself be made available to the public for a 3 day public comment period prior to implementation and any interest groups may review and comment accordingly.

CDBG-CV Funds

The City of Benton Harbor has been allocated \$328,823.00, in CDBG-CV funding through the CARES Act. CDBG-CV must be used for the prevention of, preparation for, and responding to the coronavirus pandemic. Activities must also comply with an eligible CDBG National Objective. Staff recommends that the CDBG-CV funds be programmed as follows and discussed in detail below:

| Activity Name | CARES Act Substantial Amendments CDBG-CV | Reprogrammed Funds | Grant Outcomes |
|---|---|-------------------------------|---------------------------|
| Program Administration | \$50,181 | | |
| Public Services Senior Services, Inc. | \$20,000 | | 20 Persons |
| Public Services – subsistence (Rent and Utility Assistance Program) | \$50,000 | | 75,000 Households |
| Housing - Rehabilitation and reconstruction of Privately owned properties | \$117,918 | 45,000 | 15 Households |
| Public Services - Shelter Operations | \$60,000 | | |
| Foodbank (SMCAA) | \$30,724 | | 300 households |
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| TOTAL: | \$328,823.00 | \$45,000.00 | |

The \$45,000 that is reprogrammed is from amounts that were programmed in CV-1 for Protective equipment that wasn't used and as the pandemic is subsiding, it is now considered not necessary. Also, there was money programmed for small business support that was not used at the earlier stages of the pandemic and later with numerous other CV funding programs having been made available from other sources, raised concerns that we lacked the administrative capacity to address the duplication of benefits concerns in HUD's regulations.

Program Administration - \$50,181 CDBG-CV

Up to twenty (20) percent of a recipient's allocation can be used for administrative activities. These include general management, oversight, and coordination; reporting on the program; the costs of providing training on CDBG-CV requirements and attending HUD-sponsored trainings; the costs of preparing and amending the Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities. This activity will be administered by City of Benton Harbor Community and Economic Development Department.

Public Services - Senior Services, Inc. - \$20,000 CDBG-CV

The City is programming \$20,000 of CDBG-CV funding to respond to the COVID-19 Pandemic by providing healthy meals to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities. The purpose of the program is to aid in the form of meals for City of Benton Harbor senior residents for up to three months. Funding will be made directly to a qualified provider on behalf of the qualified residents. Eligible residents include those living in households with incomes at or below 80% AMI, can provide documentation of need and the applicable impact of COVID-19, etc.

Public Services - Rent and Utility Assistance Program \$50,000 - CDBG-CV (Gas and Electric only) – CDBG-CV

A new program that will provide rental and/or utility assistance to low to moderate-income households located within the City of Benton Harbor. The assistance will be available for up to three (3) consecutive months and the payments will go directly to the landlords and/or utility provider.

Public Services - Shelter Operations \$60,000 - CDBG-CV

Assistance will include maintenance, rent, repair, security, fuel equipment, insurance, utilities, food furnishings, and supplies necessary for the operation of the Emergency Safe Shelter, Men's Salvation Army and CORA Lamping Center. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual. Funding for this activity will be administered by eligible provider agencies operating in the City.

Food Bank \$30,724 - CDBG-CV

A new program implemented will provide funds to Southwest Michigan Community Action Agency (SMCAA) to assist with the purchase of protein products, personal hygiene products. Eligible residents include those living in households with incomes at or below 80% AMI.

Housing - Rehabilitation and reconstruction of Privately owned properties (\$117,918) - CDBG-CV

A new program implemented in response to the effects of Coronavirus living conditions such as mold, lead-based paint, and poor ventilation associated with more severe coronavirus disease or poorer post-Covid health outcomes by providing forgivable loans for rehabilitating homeowner housing to comport with standard building codes and public health advice.