

Clark County, Nevada
SUBSTANTIAL AMENDMENT
CDBG-CV and ESG-CV

A Substantial Amendment for the Clark County, Nevada Community
Development Block Grant (CDBG) and Emergency Solutions Grant
(ESG) for the Coronavirus Aid, Relief, and Economic Security
(CARES) Act of 2020

Clark County, Nevada, Clark County Social Service
Community Resources Management
October 1, 2020

General Information

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| Grantee Name | Clark County |
| Name of Entity or Department Administering Funds | Clark County Social Service, Community Resources Management |
| CDBG Contact Person (person to answer questions about this amendment and CDBG) | Jasmine Carr |
| Title | Grants Coordinator |
| Address Line 1 | 1600 Pinto Lane |
| Address Line 2 | |
| City, State, Zip Code | Las Vegas, Nevada 89106 |
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| E-mail Address | Jasmine.Carr@clarkcountynv.gov |

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| Grantee Name | Clark County |
| Name of Entity or Department Administering Funds | Clark County Social Service, Community Resources Management |
| ESG Contact Person (person to answer questions about this amendment and ESG) | Dr. Tameca Ulmer |
| Title | Grants Coordinator |
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| E-mail Address | Tameca.Ulmer@clarkcountynv.gov |

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| Authorized Official (if different from Contact Person) | Karen Schneider |
| Title | Manager, Community Resources Management |
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| E-mail Address | Karen.Schneider@clarkcountynv.gov |
| Web Address where this form is posted | https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/federal_reports_action_plan_caper_rai.php |

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|------------------------------------|---------------------|
| CDBG CV1 Amount | \$4,731,978 |
| CDBG CV3 Part A Amount | \$9,713,006 |
| CDBG CV Total | \$14,444,984 |
| ESG CV1 Amount | \$2,333,003 |
| ESG CV2 Amount | \$12,264,384 |
| ESG CV Total | \$14,597,387 |
| Substantial Amendment Total | \$29,042,371 |

Introduction

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 was signed into law to assist communities in their efforts to prevent, prepare for and respond to the novel coronavirus COVID19. The CARES Act is providing \$4,731,978 in Community Development Block Grant (CDBG) CV1 funds, \$9,713,006 in CDBG CV3 Part A funds, \$2,333,003 in Emergency Solutions Grant (ESG) CV1 funds, and \$12,264,384 in ESG-CV2 funds. The U.S. Department of Housing and Urban Development (HUD) requires a Substantial Amendment to the Clark County HUD Action Plan 2020 to reflect this funding and its proposed uses.

Clark County Social Service (CCSS), Community Resources Management (CRM) will work in cooperation with the U.S. Department of Housing and Urban Development (HUD) in order to expeditiously deliver and effectively administer these funds. CRM is confident that the proposed plan meets the intent of CDBG-CV and ESG-CV and is consistent with all applicable requirements, per the directives under HUD’s Notice. The County may amend this Plan to make any needed adjustments to meet community needs and priorities.

CDBG-CV Provisions

This funding is intended to prevent, prepare for, and respond to coronavirus, including activities within entitlement and non-entitlement communities, based on public health needs, risk of transmission of 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. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for, and respond to coronavirus.

The Department of Housing and Urban Development has also waived 24 CFR 91.505, reducing the number of public notice days to a minimum of 5, to facilitate the use of the CDBG-CV funds to the extent necessary to require submission of the substantial amendment to HUD for review in accordance with 24 CFR 91.500.

The CARES Act removes the statutory 15% cap on the amount of a jurisdiction’s CDBG allocation that can be used for “public services,” which the provision of rental or utility payment

assistance would normally be considered. The Act limits the exemption from the 15% cap to “activities to prevent, prepare for, and respond to the coronavirus”. The Act also states that a jurisdiction’s FY19 and FY20 CDBG allocations are also free from the 15% public-service cap.

CDBG-CV grants are subject to the requirement that 70% of funds are for activities that benefit Low and Moderate Income (LMI) persons.

80% of CDBG-CV funds must be expended by the end of the third year of the six-year period of performance.

The receipt and expenditure of program income that is generated by the use of CDBG-CV funds will be treated as annual formula CDBG program income.

CDBG-CV grants are subject to all environmental review requirements outlined in 24 CFR Part 58 as well as Davis-Bacon prevailing wage requirements imposed by section 110(a) of the HCD Act.

CDBG-CV grantees are subject to the requirement that prevents the duplication of benefits that is caused when a person, household, business, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance is more than the total need.

CDBG-CV 1 Spending Plan

| CDBG CV1 | | | |
|--------------|-----------------------------------|--|---------------------|
| JURISDICTION | ACTIVITY | Description | Amount |
| Clark County | Homeless Services Case Management | Provide case management services in support of a rapid rehousing surge in response to Covid-19 | \$ 3,974,863 |
| | Administration (10%) | Staff support to administer the funds effectively and maintain compliance with federal regulations | \$ 473,197 |
| Boulder City | Boulder City Public Services (3%) | purchase of supplies to respond to COVID-19, expenditures to set up and maintain the City's Emergency Operations Center (EOC) including preparing for a potential surge in local cases, and costs related to working with non-profit partners that are on the front line | \$ 141,959 |
| Mesquite | Mesquite Public Services | Public services in response to Covid-19. Specific agencies will be identified at a later date | \$ 141,959 |
| | Mesquite (total 3%) | Capital improvements to Mesquite Recreation Center for child care usage | |
| Total | | | \$ 4,731,978 |

CDBG-CV3 Part A Spending Plan

| CDBG CV3 Part A | | | |
|-----------------|-----------------------------------|--|---------------------|
| JURISDICTION | ACTIVITY | Description | Amount |
| Clark County | Homeless Services Case Management | Provide case management services in support of a rapid rehousing surge in response to Covid-19 | \$ 8,158,926 |
| | Administration (10%) | Staff support to administer the funds effectively and maintain compliance with federal regulations | \$ 971,300 |
| Boulder City | Boulder City (3%) | To be determined | \$ 291,390 |
| Mesquite | Mesquite (3%) | To be determined | \$ 291,390 |
| Total | | | \$ 9,713,006 |

CDBG-CV Application Procedure

HUD has allowed for an expedited citizen participation procedure in which virtual public hearings are utilized and a public comment period of no less than 5 days is permitted.

Per the Declared Emergency Citizen Participation Plan, applications will be reviewed by a group of county employees from several departments and all recommendations will be taken to the Board of County Commissioners for public comment and approval.

The County will consult with the two cities participating in its Urban County CDBG program, the City of Boulder City and the City of Mesquite to identify projects to be funded with CDBG-CV funds.

The Citizen Participation Plan FY2020-2024 is available at:https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/citizen_participation.php

ESG-CV Provisions

ALL funding must be used to prevent, prepare for, and respond to coronavirus, including activities within entitlement and non-entitlement communities, based on public health needs, risk of transmission of coronavirus.

ESG-CV subrecipients are not required to provide matching funds.

There is no spending cap on Emergency Shelter and Street Outreach for ESG-CV funds.

The administrative activities cap has been increased from 7.5% to 10% instead of 7.5% for ESG-CV funds.

Income eligibility for ESG-CV program participants has been increased to 50% instead of 30% Area Median Income (AMI) for homeless prevention activities.

ESG-CV sub-recipients may not require program participants to receive treatment or perform any other pre-requisite activities as a condition for shelter, housing, or services.

The length of service has been decreased to 12 months for medium-term rental assistance instead of 24 months.

Fair market rent limit is waived; units must still meet Rent Reasonableness standards.

80% of ESG-CV funds must be expended by March 31, 2022 of the two-year period of performance.

ESG-CV 1 Spending Plan

| ESG CV1 | | |
|-------------------------|--|---------------------|
| ACTIVITY | Description | Amount |
| Homeless Prevention | Fund homeless prevention activities including rent and utility assistance | \$ 2,074,703 |
| | HMIS project configuration, SAGE set-up, reporting, validation | \$ 25,000 |
| Administration (10%) | Staff support to administer the funds effectively and maintain compliance with federal regulations | \$ 233,300 |
| | Total | \$ 2,333,003 |

ESG-CV 2 Spending Plan

| ESG CV2 | | |
|-------------------------|--|----------------------|
| ACTIVITY | Description | Amount |
| Rapid Rehousing | Fund rapid rehousing activities in response to Covid-19 related housing needs including homeless households which are highly vulnerable to poor outcomes | \$ 9,750,946 |
| | Landlord Incentives - signing bonuses, damages, security deposits, maintenance | \$ 300,000 |
| Street Outreach | Mobile shower units (operations - 2 yrs) | \$ 987,000 |
| Administration (10%) | Staff support to administer the funds effectively and maintain compliance with federal regulations | \$ 1,226,438 |
| | Total | \$ 12,264,384 |

ESG-CV Application Procedure

HUD has allowed for an expedited citizen participation procedure in which virtual public hearings are utilized and a public comment of no less than 5 days is permitted.

Per the Declared Emergency Citizen Participation Plan, applications will be reviewed by a group of county employees from several departments and all recommendations will be taken to the Board of County Commissioners for public comment and approval.

The Citizen Participation Plan FY2020-2024 is available at:https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/citizen_participation.php

PUBLIC COMMENT

The FY 2020 Action Plan Substantial Amendment was posted for a five-day public comment period in the Las Vegas Review-Journal on November 9, 2020 through November 13, 2020. The FY2020 Action Plan Substantial Amendment was also posted on Clark County's website.