

Substantial Amendment to the Consolidated Plan 2020 Action Plan For the CARES Act ESG CV Funds

The Oklahoma Department of Commerce has submitted changes to their State Emergency Solutions Grant Action Plan. The following responses explain the changes to the methodology of distribution and criteria used to award the supplemental funds.

Introduction

Congress passed the Coronavirus Aid, Relief and Economic Security Act (CARES Act) on March 27, 2020. The Act provides Relief funding for the Emergency Solutions Grant Program in order to make available and distribute funds to prevent, prepare for and respond to the coronavirus by supporting additional homeless assistance and homelessness prevention activities.

AP-12 Participation 91.115, 91.300 (c)

Public Notice Process

ODOC held a Statewide CARES Act ESG CV Planning Zoom meeting on May 14, 2020. There were 108 participants. ODOC provided a description of the flexibilities allowed for the ESG CV program and how funding would be awarded. Once the Substantial Amendment documents are compiled, a public notice will be released in emails to the Continuum of Care networks, Service Providers and through GovDelivery listserve. ODOC will place the Substantial Amendment on the Department of Commerce website.

AP 15 – Expected Resources 91.320 (c) (1,2)

Narrative Description

It is anticipated that 100% of the CARES ACT ESG-CV Funding will be used for eligible services such as Administration, shelter, services, housing and prevention. Funds will be used for approved services that lead to the prevention, preparation and response to coronavirus among individuals and families who are homeless or receiving homeless assistance. No Match has been required of the CARES Act Funding.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the Program Descriptions / One-Year Action Plans, which are included in the annual Consolidated Plan.

AP 30 – Method of Distribution 91.320 (d) & (k)

Describe the state program addressed by the Method of Distribution.

Funds will be allocated to each of the 7 rural (Non-ESG Entitlement) CoC's. The allocation to Tulsa County CoC is to award funds to agencies that serve the area outside of the City of Tulsa. Starting with a base dollar amount, the formula described below will be used to complete the remainder of a total allocation amount for each eligible Continuum of Care for distribution within its service area.

Applications will be accepted and separated by Continuum of Care Service Area. Applications will be assessed for compliance with all ESG and CoC threshold criteria first. Then a Committee will score and rank the submitted applications based on the approved rating system. Highest to lowest scoring applicants will be awarded ESG-CV funds until the funds allocated to each Continuum of Care Service Area have been depleted. ODOC will enter into contractual agreements with each subrecipient to carry out the financial and programmatic requirements according to law. The contracts will outline the funding source, funding year, amount of funding, terms and conditions. Each CoC has the authority and responsibility to create their own policies and procedures pertaining to funding amounts and division of funding eligible activities.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The approved rating system will be based on required documentation submitted to show proof of capacity and thorough understanding of the needs of their service area and how best to use the funds to provide the best services for immediate, mid-term and long-term needs. Required documentation includes a Community Needs Assessment (CNA). The CNA will include each applicants' responses to needs and resources based on equity implications, local health impacts, Employment and education impacts as well as immediate, mid-term and long-term needs.

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

The State ESG CV program is a competitive program and geographic distribution is based on applications received and the results of the project selection process. The eligible applicants are units of general local government, Community Action Agencies (CAAs) and Independent Service Provider non-profits. The ESG CV applications will be accepted to fulfill the ESG CV funding award. (See detailed program description in the ESG CV Annual Action Plan) The State ESG CV Action Plan can also be viewed on the Oklahoma Department of Commerce website.

Describe how resources will be allocated among funding categories.

The formula used for ESG CV project funding: 10% - 2014 Estimated Total Population; 20% - Weighted Median Income Measure; 30% - April 2020 Quintile Tiering Based on Unemployment Rate ; 30% - 2020 COVID-19 Cases Per County; 10% - Uninsured SAHIE as of 15May20.

Describe threshold factors and grant size limits.

All Emergency Solutions Applicants must meet the listed threshold criteria. ODOC reserves the right to disqualify any applicant who does not meet one or more of the threshold criteria.

- Applicant / Shelter must have an emergency shelter component or partnership to provide emergency shelter services.
- Access to the Shelter or access to beds must be available 24 hours /7 days/365 days a year.
- Applicant/ Shelter must provide documentation of active involvement in Continuum of Care planning and coordination of service efforts.
- Applicant/ Shelter must provide documentation that the applicant is a participating member of the Continuum of Care's Coordinated Intake/Assessment.
- Applicant/ Shelter must provide required data\reporting through their Continuum of Care HMIS or comparable (DV organizations only) database.
- All outstanding monitoring findings and audit or unresolved financial/program issues from previously awarded grants must be resolved.
- All required certifications must be received and signed by the appropriate signatory.
- Must have a complete set of written policies and procedures in which to manage the Emergency Solutions Grant Program.
- Must have Termination of Participation and Grievance Procedures.
- Must have a process for participation of Homeless Persons in Policy-Making and Operations.
- Must have a Confidentiality Policy.
- Must have a current Audit submitted before funds can be requested from grant.
- Must follow all General Record Keeping Requirements, both for financial and client files.
- Must be activated in the System for Award Management (SAM). Applicant must be clear of any findings and show as eligible for federal contracts and assistance awards.

What are the outcome measures expected as a result of the method of distribution?

The same outcome measures for the regular Emergency Solutions Grant Program will be used for the CARES Act ESG CV program. A list of the outcome measures can be found in the detailed State Action Plan.

INTERIM ESG-CV Certifications (STATE)

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

~~**Matching Funds** – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).~~

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation. **EXCEPTION:** In accordance with the CARES Act, the certifications in this paragraph do not apply with respect to CARES Act funding that is used to provide temporary emergency shelters (through leasing of existing property, temporary structures, or other means) to prevent, prepare for, and respond to coronavirus.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area. **EXCEPTION:** In accordance with the CARES Act, the certification in this paragraph does not apply with respect to CARES Act funding that is used to provide temporary emergency shelters

(through leasing of existing property, temporary structures, or other means) to prevent, prepare for, and respond to coronavirus.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State’s current HUD-approved consolidated plan.

Marshall Vogts
Signature/Authorized Official

06/02/2020
Date

Director, Community Development
Title