

ESG-CV Spending Plan Office Hours

August 16, 2021

Webinar Format and Housekeeping Items

- · 60 minutes total
- Approximately 25 minutes for questions
- Participants are muted by default
- To ask a question at any time, use the Chat Box feature to the right of the presentation slides
- We will answer as many questions as possible during the Q&A portion of the webinar
- After the webinar, please submit any outstanding questions to HUD AAQ



Speakers & Resource Advisors

Department of Housing and Urban Development

Office of Special Needs Assistance Programs

- Karen DeBlasio, Division Director
- Latesha Balam-Totten, Special Needs Assistance Specialist





- Review ESG-CV Progressive Expenditure Deadline Requirements
- Review Spending Plan components and submission process

• Q&A



Progressive Expenditure Requirements

- HUD may recapture up to 20 percent of a recipient's total award, including first and second allocation amounts, if a recipient has not spent at least 20 percent of their total grant by September 30, 2021.
- HUD may recapture up to 80 percent of a recipient's total award, including first and second allocation amounts, if a recipient has not spent at least 80 percent of their total grant by March 30, 2022.
- Prior to recapturing funds, HUD will provide recipients with an opportunity to provide a spending plan demonstrating that all of the recipient's ESG-CV funds from the first and second allocations will be expended by September 30, 2022.



SNAPS Outreach to Recipients

- You may have recently received an outreach email from SNAPS staff including a letter from Norm Suchar, Director of the SNAPS Office, and an optional spending plan template.
- If you've been contacted, it means that, based on your current draw rate, HUD has projected that you are not on track to meet the 20% deadline.
- While not required, you're encouraged to submit the spending plan template to report how you are planning to spend down your ESG-CV funding and the timeframe for doing so.
- Ultimately, the purpose of the spending plan is to gain assurance that recipients are on track to fully expend their critical CARES Act funding.



Clarifying Expenditures vs. Draws

- Expenditures include -
 - actual cash disbursement (i.e., draw) for a direct charge for a good or service or
 - \circ an indirect cost or
 - the accrual of a direct charge for a good or service or an indirect cost.
- Expenditures include not only drawn funds but also incurred costs.
- Recipients may meet the 20 percent expenditure requirement:
 - By drawing down at least 20 percent of their ESG-CV funds from the IDIS; or
 - through the accrual of ESG-CV costs as reported in ESG-CV QPRs submitted in Sage.



Spending Plan Questions

- The Spending Plan questions are intended to pinpoint common situations recipients are likely to face that could impact their ability to reach the expenditure deadline, such as:
 - Lower but steady expenditures due to the nature of the activity (e.g., RRH rental assistance which can't be expended in advance);
 - Expenditures for shelter rehab projects, which may require a different spending trajectory;
- HUD's preference is to work with recipients to avoid situations which would require the recapture of funds. Indicating any capacity issues in the spending plan is an important step so we're able to assist you as needed.
 Don't wait to reach out for help!



Changing Your ESG-CV Approach

- Much has changed since last year when communities began their COVID response
- Take the opportunity to reevaluate your strategy for using ESG-CV funds to address the severest housing needs
- Use this once-in-a-lifetime opportunity to focus your ESG-CV resources on housing the most vulnerable people in your community – those experiencing literal homelessness.
- If you have implemented non-congregate shelter during the pandemic, this is an opportunity to permanently house those individuals and ensure that no one returns to shelter or unsheltered situations



Changing Your ESG-CV Approach

- Consider reprogramming Homelessness Prevention funds to Rapid Rehousing. Prioritize Treasury Emergency Rental Assistance Program (ERAP) funds for eviction prevention.
- Consider using ESG funding to provide supportive services to support households receiving an Emergency Housing Voucher (EHV).
- Strategically use ESG for landlord incentives and landlord engagement activities to broaden access to available rental units
- Consider using ESG funds to provide vaccine incentives to people experiencing homelessness, which could make the difference between someone choosing to be vaccinated or not.



Changing Your ESG-CV Approach

- Amendments to the Consolidated Plan or Annual Action Plan should be made in accordance with 24 CFR 91.505
- Repurposing funds from one activity to another may not necessarily require the need for a Substantial Amendment – reach out to your field office or submit an AAQ if you need feedback in making that determination.
- <u>Remember</u>: the public comment period and citizen participation requirements waived for both ESG-CV and annual ESG used for COVID response. Requirement is to publish planned changes on your government website.



Spending Plan Run-Through



Spending Plan Team

- Karen DeBlasio
- Marlisa Grogan
- Sharon Singer
- Latesha Balam-Totten
- Janet Jones
- Corinne Donley

*Special thank you to Erin Cox, Omar Smiley, Harper Sutherland



