

Congress of the United States
Washington, DC 20515

March 24, 2020

The Honorable Benjamin S. Carson
U.S. Department of Housing & Urban Development
451 7th Street, Southwest
Washington, D.C. 20410

Dear Secretary Carson:

We are writing you in support of the attached request from Mayor Harry Kim of Hawai'i County for regulatory and statutory relief and increased funding for the Community Development Block Grant (CDBG) Program in light of the Coronavirus Disease 2019 (COVID-19) pandemic.

CDBGs are vital to counties nationwide, including Hawai'i County, in helping low and moderate-income people and their neighborhoods. Since 1974, this important program has provided funds for housing investments, public infrastructure improvements and economic development, while also providing a wide range of public services, including assistance for seniors, youth, the disabled and those needed employment training. Ensuring more flexibility in how to use CDBG funding, along with providing additional funding, would make sure our nation is doing all it can to help vulnerable communities combat COVID-19. Thus, we urge to you support Mayor Kim's request.

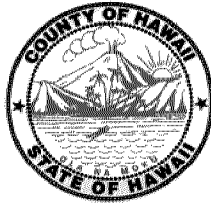
If you have any questions, please contact Cynthia Noblezada in Congressman Ed Case's Office (202-225-2726 or cynthia.noblezada@mail.house.gov) or Dave Chun in Congresswoman Tulsi Gabbard's Office (202-225-4906 or dave.chun@mail.house.gov).

With aloha,

Tulsi Gabbard
Member of Congress

Ed Case
Member of Congress

Harry Kim
Mayor



Roy Takemoto
Managing Director

Barbara J. Kossow
Deputy Managing Director

County of Hawai'i Office of the Mayor

25 Aupuni Street, Suite 2603 • Hilo, Hawai'i 96720 • (808) 961-8211 • Fax (808) 961-6553
KONA: 74-5044 Ane Keohokalole Hwy., Bldg C • Kailua-Kona, Hawai'i 96740
(808) 323-4444 • Fax (808) 323-4440

March 19, 2020

Via Electronic only

Rep. Ed Case

e-mail: ed.case@mail.house.gov
ben.chao@mail.house.gov

Rep. Case:

Re: Request for Regulatory/Statutory Relief and Increased Community Development Block Grant (CDBG) Funding to Respond to the COVID-19 Crisis

The relentless spread of the coronavirus globally and locally is an urgent and increasing concern. On behalf of the County of Hawai'i, I am writing for your assistance in seeking regulatory/statutory relief and increased Community Development Block Grant (CDBG) funding to help our County to quickly and effectively respond to the COVID-19 crisis.

The attached letters were sent to the U.S. Department of Housing and Urban Development (HUD) and to Congressional appropriations leaders requesting modifications to the CDBG program regulations and statutory requirements, and for additional CDBG funding.

Thank you very much for your continued support to help the citizens of Hawai'i in all you do and to address the COVID-19 emergency.

Sincerely,

HARRY KIM
Mayor, County of Hawai'i

Attachments

cc: OHCD

March 17, 2020

Mr. John Gibbs
Acting Assistant Secretary
Office of Community Planning and Development
451 7th Street SW
Washington, DC

Dear Mr. Gibbs:

This letter requests immediate regulatory relief for grantees administering the Office of Community Planning and Development (CPD) programs to allow them to quickly respond to COVID-19.

Local government grantees responsible for administering the Community Development Block Grant Program (CDBG), HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG) Program, and other CPD programs are on the frontlines of the local response to the COVID-19 crisis and will be for many weeks and months ahead. Many local government staff, including those that administer the CPD grant programs, have been assigned to work on crisis response teams. Grantees administering these programs are facing challenges in aiding low and moderate-income people and neighborhoods in addressing COVID-19 because of existing program regulations. Ensuring flexibility in current CPD programs is critical as communities address this pandemic. Regulatory relief from HUD is needed immediately.

Existing HUD program requirements inhibit the ability of grantees to rapidly and effectively respond to community needs to address this crisis. We urge you to make the following immediate program changes.

- Ensure the timely release of the FY2020 grant agreements and grant funding. These funds are needed as quickly as possible to help low/moderate-income communities address and recover from this pandemic.
- Seek the suspension of the 15% public services cap. The suspension of the public services cap requires Congressional approval and we urge HUD to request this suspension immediately. Our organizations have asked Congress to suspend the cap. In addition, we urge HUD to request Congress to allow States to award directly to nonprofits for public services or through an MOU to other agencies to carry out activities directly.
- Suspend the CDBG program timeliness test for this program year. Grantees are anticipating delays in program deployment because of COVID-19. Project timelines will be impacted by closures and the diversion of local government resources to the COVID-19 response.
- Regarding the Action Plan, 5-Year Consolidated Plan, CAPER:
 - Suspend (waive) the public meeting and public input requirements for the Action Plan and 5-Year Consolidated Plan.
 - Extend the submission deadline for the Action Plan and 5-Year Consolidated Plan.
 - Extend the deadline for CAPER submittals.
- Activities related to treatment of or assistance with the consequences of COVID-19 should be deemed emergency activities and grantees should be able to shift funds by a declaration of the grant official without the typical amendment to plans requirements.
- Suspend program monitoring requirements to allow grantees to continue to focus solely on crisis response.
 - Suspend HUD's monitoring of grantees.
 - Suspend grantee monitoring and audits of subrecipients and projects.

- Allow pre-award expenses to continue to be paid to subrecipients to help buffer the financial impact on subrecipient staff, many of whom are low-income.
- Waive requirements on completing Environmental Reviews.
- Regarding the HOME Program:
 - Waive the HOME match requirement.
 - Provide flexibility in the HOME TBRA income requirements in order to serve more people who are unable to pay rent due to the crisis.
 - Suspend funding commitment deadlines.
 - Relax the monitoring of the HOME program, particularly completed rental developments. PJs should be allowed to defer rental project inspections for this program year.
- Regarding the Emergency Solutions Grant Program:
 - Waive the match requirement.
 - Suspend the 60% cap on emergency shelter assistance.
 - Provide maximum feasible flexibility with documentation required to provide homeless prevention and rapid rehousing assistance.
- Extend the due date for HOPWA-C renewals.
- Provide other CPD waivers quickly, where needed.

Request additional funding for CDBG

While CDBG-DR is usually the approved method for distributing disaster funds, we urge you to advocate for an increase in regular CDBG program funding. The CDBG program is well targeted to low- and moderate-income areas that will need these funds. This pandemic is not localized to one or two areas, but nationwide. Given the potential impact of the virus, relief will have to move much quicker and the CDBG program provides the infrastructure to do so.

We look forward to your quick response to this letter. Please feel free to contact Vicki Watson, Executive Director, National Community Development Association, with any questions at vwatson@ncdaonline.org or at 540-656-9552.

Sincerely,

The National Community Development Association

The National Community Development Association is a bi-partisan national organization comprised of nearly 500 local governments across the country that administer federally supported affordable housing, economic development, homelessness assistance, and community development programs, including CDBG, HOME, ESG and other HUD programs.

The National League of Cities

The National League of Cities (NLC) is the voice of America’s 19,000 cities, towns and villages, representing more than 200 million people; and is a resource and advocate for the nation's cities and their leaders.

U.S. Conference of Mayors

The U.S. Conference of Mayors is the official non-partisan organization of cities with a population of 30,000 or larger. Each city is represented by its chief elected official, the mayor.

National Association of Counties

Founded in 1935, the National Association of Counties is the only national organization that represents America's 3,069 county governments. Counties play a fundamental role in helping ensure the health and well-being of residents.

Council of State Community Development Agencies

The Council of State Community Development Agencies represents state housing and community development agencies responsible for administering federal affordable housing, community development, and homeless assistance programs through the U.S. Department of Housing and Urban Development.

National Association for County Community and Economic Development

The National Association for County Community and Economic Development represents county government practitioners that administer federally funded affordable housing, community development, and economic development programs benefiting low- and moderate-income households.