

City of St. Louis  
Community Development Administration



Substantial Amendment for COVID -19 Funding  
2019 Annual Action Plan

December 10, 2021

## **Introduction**

In accordance with Title 24 Section 91.505 of the Code of Federal Regulations, the Coronavirus Aid, Relief and Economic Security Act of March 27, 2020, H.R.748, and other HUD directives, the City of St. Louis is submitting this Substantial Amendment to its 2019 Annual Action Plan.

This document describes program and funding amendments as proposed by the Community Development Administration (CDA) or funding received by the City of St. Louis pursuant to the Coronavirus Aid, Relief and Economic Security Act of March 27, 2020, H.R.748 (the “CARES Act”), specifically Community Development Block Grant funding in response to the coronavirus for CDA (“CDBG-CV”) and funding in response to the coronavirus for the Emergency Solutions Grant (“ESG-CV”) and Housing Opportunities for Persons with AIDS (“HOPWA-CV”) programs.

Concurrently, by separate submission, CDA is proposing to amend its Citizen Participation Plan to reflect current project timelines for the amendment and subsequent release of its Amended 2019 Annual Action Plan in response to the above CARES Act funding and other HUD waivers and directives.

## **Regulatory Basis**

24 CFR 91.505 requires that the City identify in its Citizen Participation Plan the criteria used for determining what constitutes a substantial amendment. The City’s approved and existing Citizen Participation Plan notes that a substantial amendment will be considered to exist when there is:

1. A transfer of funds from an existing line item to a new activity or to a new subrecipient or subgrantee which has not been funded in the current grant year; or
2. A change in excess of 10% for a funded subrecipient or subgrant activity (excludes activities administered by City Departments); or
3. A change in allocation priorities or a change in the method of distribution of funds;
4. An activity type not described in the Annual Action Plan is funded; or
5. A change to the purpose, scope, location, or beneficiaries of an activity; or
6. A change in priorities contained in the ConPlan.
7. there is a proposed change to the 2019 and/or 2020 Annual Action Plan associated with CDA receipt of CDBG-CV, HOME, ESG-CV and HOPWA-CV funding.

The proposed changes below to the 2019 Annual Action Plan meet at least one of the above criteria, and as such require a substantial amendment. We begin with a summary of the related amendment to CDA’s Citizen Participation Plan

**For CARES Act funds - CDBG-CV, ESG-CV and HOPWA-CV -** For any Substantial Amendment to the 2019 Annual Action Plan or 2020 Annual Action Plan for CDBG-CV, HOME,<sup>1</sup> ESG-CV and HOPWA-CV funds, the public will have a **5-day public comment period** to review and respond to the proposed Substantial Amendment and CDA will hold a public hearing regarding the Substantial Amendment **with a minimum of 5 days advance public notice of the hearing.** This 5-day period is pursuant to a reduction in the time for public comment pursuant to Waiver requests submitted to HUD by CDA on behalf of CDBG-CV and HOPWA-CV emergency funds and via a separate Waiver request for ESG-CV funds, and the subsequent approval of these Waiver requests by HUD.

**I. Substantial Amendment: 2019 Annual Action Plan reflecting CDBG-CV, ESG-CV and HOPWA-CV funding**

This Substantial Amendment will enable the City of St. Louis to receive and administer a special allocation from the US Department of Housing and Urban Development to be used to prevent, prepare for and respond to COVID-19. This allocation was authorized by the CARES Act, Public Law 116-136 and includes \$10,840,586 under the Community Development Block Grant (CDBG-CV), \$5,432,145 under the Emergency Solutions Grant (ESG-CV) and \$337,889 under the Housing Opportunities for Persons with AIDS Program (HOPWA-CV). ESG program funds are administered by the Department of Human Services and the HOPWA program funds are administered by the Department of Health of the City of St. Louis.

Activities funded by CDBG-CV, ESG-CV and HOPWA-CV programs must meet all applicable federal requirements.

**CDA hereby submits a Substantial Amendment for the proposed uses of the CDBG-CV, ESG-CV and HOPWA-CV coronavirus relief funds in order to redistribute \$500,000 of CDBG-CV funding from the category of Public Facilities and Improvements and to be moved to the category of Public Services as outlined below:**

**A. CDBG-CV funding**

**1. Public Services:**

CDBG-CV fund use: **\$4,456,527**

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<sup>1</sup> Note here the CARES Act did not make additional HOME funds available on an emergency basis, but may do so in the future. This CPP would apply to any HOME emergency funds to the extent HUD allows for the same modified requirements as set forth herein for these potential prospective funds.

(includes funding for Department of Health and other public services to be awarded pursuant to the CDA issued RFP of May 8, 2020, and Utility Assistance)

**2. Public Facilities and Improvements:**

CDBG-CV fund use: **\$2,100,000**  
(includes Public Facility and Improvement projects to be awarded pursuant to the CDA issued RFP of May 8, 2020)

**3. Housing (Rehabilitation and New Construction):**

CDBG-CV fund use: \$3,500,000

**4. Administration:**

CDBG-CV fund use: \$ 784,059  
(includes CDA and Department of Health administration)

**Total CDBG-CV 1 funds:** **\$10,840,586**