

# State of Louisiana Recovery Housing Program Action Plan

*Proposed*



FY 2020 and 2021

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## Program Summary

The Recovery Housing Program, or RHP, authorizes the appropriation of funds for assistance to states to provide stable, temporary housing to individuals in recovery from a substance use disorder. RHP aims to support individuals in recovery on a path to self-sufficiency and independent living. Data shows that without stable housing, the risk of relapse and inability to maintain abstinence is greatly increased.

RHP assistance is limited, per individual, to a period of not more than 2 years or until the individual secures permanent housing, whichever is earlier. HUD has been authorized to establish a funding formula based on specific factors listed in section 8071 of the SUPPORT Act and to allocate funds appropriated or otherwise made available for RHP according to the established funding formula. HUD published the funding formula in the Federal Register on April 17, 2019 (84 FR 16027) (the "Formula Notice"). The State of Louisiana has been allocated \$838,000 for FY 2020 and an additional \$854,429 in FY 2021 under this program.

The intent for these funds be used for one or more public facility activity in the Bogalusa area after having determined it as the area most in need in the state. The State of Louisiana will administer this project through one or more subrecipients that meet the qualifications set forth in the Notice of Funding Availability to be published forthwith.

## Resources

FY 2020 RHP Allocation	\$838,000
Less Administration (5%) and Technical Assistance (3%)	<u>-\$67,040</u>
Total Amount Available	\$770,960
FY 2021 RHP Allocation	\$854,429
Less Administration (5%) and Technical Assistance (3%)	<u>-\$68,354</u>
Total Amount Available	\$786,075
<b>Total Available for Award for FY 2020 and 2021</b>	<b>\$1,557,035</b>

The State of Louisiana intends to use the combined FY 2020 and 2021 funds for a public facility, including any necessary acquisition. This project will be administered through one or more subrecipient who will need to leverage additional resources for operating expenses.

Any Program Income generated by a project using these funds must be returned to the State and will be utilized on another RHP project. If Project Income is received at a time when all RHP grants are closed and no other RHP funds are anticipated, the funds will become part of the regular CDBG program income and utilized on a project in the Public Facilities Program.

## Administration Summary

The program will be administered by the State of Louisiana, Office of Community Development-Local Government Assistance (OCD-LGA). OCD-LGA will be responsible for the implementation and

management of the RHP funded activity(ies). OCD-LGA has partnered with the Louisiana Department of Health, Office of Behavioral Health for their expertise in the field of substance use and recovery. Fenishia Favorite is a Community Development Specialist in OCD-LGA and will act as the grant representative. Her responsibilities will include communicating with the subrecipient, reviewing payment requests and completing required performance reports. She will also attend HUD sponsored webinars and trainings pertaining to the Recovery Housing Program, providing updates to subrecipients for any HUD required or recommended program practices. Other OCD-LGA staff will provide support in reviewing financial analysis, plans and specifications, program monitoring, etc.

Points of Contact:

Fenishia Favorite, Community Development Specialist  
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Website: <https://www.doa.la.gov/oa/ocd-lga/>

**Uses of Funds**

*Method of Distribution*

The State will administer this program directly through an eligible subrecipient. These funds can be used to construct or rehabilitate one or more public facility. The OCD-LGA worked with the Louisiana Department of Health, Office of Behavioral Health to identify the area with the greatest need. Based on data collected by LDH, the Bogalusa area was determined as having the greatest need and currently lacking in facilities. If funds are sufficient to construct a second facility or if funds become available with Program Income, another location may be identified by LDH.

Eligible subrecipients will be identified through our partnership with the Office of Behavioral Health and their approved service provider non-profit organizations. A Notice of Funding Availability will be published and the applications will be scored based on the criteria below.

*Activities Carried Out Directly*

The State of Louisiana will make one or more grants to eligible subrecipient organizations for the construction, acquisition and/or rehabilitation of public facilities and improvements.

*Eligible Subrecipients*

Eligible sub-recipients are nonprofit entities that have a valid license through the State of Louisiana, have experience providing successful services related to substance use disorder recovery, and have capacity to carry out the grant in a timely manner.

### *Criteria for Evaluation*

The criteria below will be used to score and rank the responses to the NOFA:

- Licensed and in good standing with the State of Louisiana to provide substance abuse and recovery residence services
- Experience providing substance abuse recovery residence services
- Previous experience with federal awards and/or collaborating with other federal programs, including HUD and HHS.
- Data and/or explanation regarding the organization's unmet needs.
- Capacity for additional services in the Bogalusa area
- A plan for providing annual outcome measures including the proposed number of individuals assisted with RHP funding, proposed number of individuals able to transition to permanent housing and how the project measures success.
- Timeline supporting the feasibility of the project
- Total cost of the project including RHP funding as well as any other federal, state, local or other funding.

### **Definitions**

**Individual in Recovery:** A person that is in the process of change to improve their health and wellness, live a self-directed life, and strive to reach their full potential.

**Substance Use Disorder:** As defined by Substance Abuse and Mental Health Services Administration (SAMHSA) - the recurrent use of alcohol and/or drugs causing clinically significant impairment, including health problems, disability, and failure to meet major responsibilities at work, school, or home.

### **Anticipated Outcomes**

One of the criteria for scoring responses to the NOFA is the applicant's plan for providing annual outcome measures including the proposed number of individuals assisted with RHP funding, proposed number of individuals able to transition to permanent housing and how the project measures success. The responses will determine how OCD-LGA identifies the anticipated outcomes.

### **Expenditure Plan**

The OCD-LGA will comply with all RHP guidelines and expend at least 30% of the funds within year one as required. 100% of RHP funds will be expended prior to the end of the period of performance. Administrative costs will not exceed 5% and technical assistance will not exceed 3% of the grant amounts. Any program income generated will be used to continue RHP- eligible activities. If Project Income is received at a time when all RHP grants are closed and no additional RHP funds are anticipated to be received, the funds will become part of the regular CDBG program income and utilized on a project in the Public Facilities Program.

### **Citizen Participation Summary**

Before the RHP final Action Plan is submitted the OCD-LGA will make available to citizens and other interested parties information that includes the amount of assistance the State of Louisiana expects to receive and the activities that will be undertaken with these funds. A memorandum will be sent out to all parties on the OCD-LGA mailing list which includes all local governments, consultants, engineers, LMA, the Police Jury Association and Planning Districts. A public notice was published in The Advocate on December 15, 2021 regarding availability of the Action Plan. OCD-LGA also published notice on it's Facebook page. OCD-LGA will make this information available on its website, <https://www.doa.la.gov/oa/ocd-lga/ocd-lga-news/>, at least 15 days before the final Action Plan is submitted to HUD. OCD-LGA will publish the proposed Action Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The comment period will begin December 15, 2021 and conclude December 31, 2021.

The Recovery Housing Plan was also discussed at a public hearing conducted on October 20, 2020 in conjunction with the State's FY 2021 Annual Action Plan. No comments were received. On June 21, 2021, HUD issued Federal Register Notice FR-6265-N-01 Notice of Waivers and Alternative Requirements for the Pilot Recovery Housing Program. This notice provided additional guidance that included combining FY 2020 and FY 2021 RHP Action Plans into a single submission. Any comments received will be attached to the RHP Action Plan submission to HUD.

### **Partner Coordination**

OCD-LGA contacted the Office of Behavioral Health to ask for data and assistance in identifying the area of need for recovery housing services. Additionally, OBH identified the Florida Parishes Human Services Authority as a potential partner with knowledge of nonprofit agencies who could participate in this program. OCD-LGA has communicated with HOPWA to determine if any other services could be provided through this project.

### **Subrecipient Management and Monitoring**

OCD-LGA will be responsible for the management and oversight of the program. The CDBG Program Evaluation and Monitoring Plan will be utilized. Subrecipients will provide at least quarterly status reports of the projects but may be required to submit monthly reports if needed. OCD-LGA will provide training for subrecipients to ensure they are fully aware of their responsibilities under the grant. All awarded projects will be monitored onsite in accordance with the established CDBG monitoring plan. The standard CDBG State Program rules and requirements will apply to the RHP program and CDBG Grantee Handbook in effect at the time of award will be used unless explicitly stated otherwise.

### **Pre-Award/Pre-Agreement**

The only costs incurred prior to the grant agreement to be reimbursed are the administrative costs associated with the development, submission, implementation of the RHP Program and Action Plan.

## Certifications

Each grantee must make the following certifications with its RHP Action Plan:

(1) The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the RHP program. The grantee certifies that it will comply with the residential anti-displacement and relocation assistance plan, relocation assistance, and one-for-one replacement housing requirements of section 104(d) of the Housing and Community Development Act of 1974, as amended (42 USC § 5304(d)) and implementing regulations at 24 CFR part 42, as applicable, except where waivers or alternative requirements are provided.

(2) The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

(3) The grantee certifies that the RHP Action Plan is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with RHP funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and the grant requirements. The grantee certifies that activities to be undertaken with RHP funds are consistent with its RHP Action Plan.

(4) The grantee certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601 et seq.), and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided.

(5) The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

(6) The grantee certifies that it is following a citizen participation plan adopted pursuant to 24 CFR 91.115 or 91.105 (as imposed in notices for its RHP grant). Also, each unit of general local government receiving RHP assistance from a state must comply with the citizen participation requirements of 24 CFR 570.486(a)(1) through (a)(7) for proposed and actual uses of RHP funding (except as provided in Federal Register notices providing waivers and alternative requirements for the use of RHP funds).

(7) The grantee certifies that it is complying with each of the following criteria: (1) funds will be used solely for allowable activities to provide individuals in recovery from a substance use disorder stable, temporary housing for a period of not more than 2 years or until the individual secures permanent housing, whichever is earlier; (2) with respect to activities expected to be assisted with RHP funds, the RHP Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income individuals and families; (3) the aggregate use of RHP funds shall principally benefit low- and moderate-income families in a manner that ensures the grant amount is expended for activities that benefit such persons; and (4) the grantee will not attempt to recover any capital costs of public improvements assisted with RHP grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or

assessment made as a condition of obtaining access to such public improvements, unless: (a) RHP grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than RHP; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient RHP funds (in any form, including program income) to comply with the requirements of clause (a).

(8) The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations, and that it will affirmatively further fair housing.

(9) The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that it will require local governments that receive grant funds to certify that they have adopted and are enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

(10) The grantee certifies that the grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

(11) The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out RHP eligible activities in a timely manner and that the grantee has reviewed the requirements of the grant.

(12) The grantee certifies that its activities concerning lead-based paint will comply with the requirements of HUD's lead-based paint rules (Lead Disclosure; and Lead Safe Housing (24 CFR part 35)), and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

(13) The grantee certifies that it will comply with environmental review procedures and requirements at 24 CFR part 58.

(14) The grantee certifies that it will comply with applicable laws.

#### **424 and 424D Forms**

Attached for the final copy to be submitted to HUD.

