



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

Special Attention of:

Notice **CPD-18-04**

All CPD Formula Grantees

Issued: **July 5, 2018**

All CPD Field Office Directors

Expires: This Notice remains in effect
until amended, superseded, or
rescinded.

SUBJECT: Supporting EnVision Centers Through the Consolidated Planning Process

PURPOSE:

The purpose of this Notice is to provide guidance to all Community Planning and Development (CPD) grantees on how to incorporate an EnVision Center and its planning process into the consolidated planning process.

Notes regarding applicability:

This Notice uses the term “grantee” generically, to also include HOME participating jurisdictions, except where the term appears in discussions explicitly limited to one of the other covered funding programs. Provisions of this Notice covering the Entitlement CDBG program also apply to Insular Areas grantees and CDBG nonentitlement county grantees in Hawaii, as the Entitlement CDBG program regulations also apply to their use of CDBG funds.

BACKGROUND

Under the leadership of Secretary Benjamin S. Carson, Sr., HUD is launching the EnVision Centers demonstration. EnVision Centers focus on empowering people to leave HUD-assisted housing through self-sufficiency to become responsible homeowners and renters in the private housing market. By doing so, HUD will be able to make those resources available to others eligible beneficiaries and help more Americans. The EnVision Centers demonstration is premised on the notion that financial support alone is insufficient to solve the problem of poverty. Intentional and collective efforts across a diverse set of organizations are needed to implement a holistic approach to foster long-lasting self-sufficiency. EnVision Centers will provide communities with a centralized hub for support in the following four pillars:

- **The Economic Empowerment Pillar:** This pillar is designed to improve the economic sustainability of individuals residing in HUD-assisted housing by empowering them with opportunities to improve their economic outlook.
- **Educational Advancement Pillar:** This pillar seeks to bring educational opportunities directly to HUD-assisted housing and includes partnering with public and private organizations that approach education in non-traditional ways on non-traditional platforms.
- **Health and Wellness Pillar:** This pillar is designed to improve access to health outcomes by individuals and families living in HUD-assisted housing.
- **Character and Leadership Pillar:** This pillar is designed to enable all individuals and families residing in HUD-assisted housing, especially young people, to reach their full potential as productive, caring, responsible citizens by encouraging participation in volunteering and mentoring opportunities.

HUD's focus on the four pillars is based on the belief that they serve as foundations to link or drive collaboration between communities, the private sector, and the federal government to improve the quality of life and empower low-income households to become self-sufficient.

Through results-driven partnerships with federal agencies, state and local governments, non-profits, faith-based organizations, corporation, public housing authorities (PHAs), and housing finance agencies, EnVision Centers will be designed to leverage public and private resources for the benefit of individuals and families living in HUD-assisted housing. HUD anticipates that positive outcomes for individuals and households will generate additional positive impacts at the community-wide level. EnVision Centers will also seek to break down the silos of government and co-locate government services that lead to self-sufficiency.

Residents will be able to engage with EnVision Center services in three ways:

- **Brick and Mortar EnVision Center:** A physical location within or near public housing. These facilities will co-locate local public and private resources and programs that low-income residents can access and benefit from.
- **Mobile Application:** Accessibility to local and national resources is needed to connect low-income households to available programs. HUD has developed a mobile application that is available to download for iPhone and Android users. Users will have access to job searching features, local health care resources, federal benefits information and other resources.
- **EnVision Network:** EnVision Network organizations share the common goals of helping more Americans lead self-sufficient lives and commit to improving outcomes in

the four pillars. These organizations will provide public services such as job training, after-school programming, and health services to low-income households.

INCORPORATING ENVISION CENTERS INTO THE CONSOLIDATED PLANNING PROCESS

Under 24 CFR Part 91, the overall goal of the consolidated planning process is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means toward this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing. This goal aligns with the EnVision Center demonstration which also is providing an opportunity for a community to encourage citizen participation and consultation; identify needs to address economic mobility for the low- and moderate-income; and use a local planning process to address its community's needs through the four pillars.

Consulting with Stakeholders §91.100 and §91.110

A primary component of EnVision Centers is extensive stakeholder involvement. Many of the same partners involved in the development of an EnVision Center are also consulted during the preparation of a consolidated plan. Under §91.100 and §91.110, when preparing a consolidated plan, a grantee consults with other public and private agencies that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons), community- or State-based and regionally-based organizations that represent protected-class members, and organizations that enforce fair housing laws. When an EnVision Center is included as a part of the consolidated planning process, coordination of outreach to these groups can reduce duplicative efforts. Grantees can highlight and enhance the consultation process by discussing how these stakeholders can improve collaboration efforts and minimize siloed planning processes.

In addition to the organizations identified above, EnVision Centers are particularly interested in the involvement of (1) public housing agencies and their residents; and (2) the business community. Here again, coordinating outreach to these entities can reduce duplicative planning efforts.

Through the consolidated planning process, local government grantees are already required to encourage, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments (including resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. State grantees are required to consult with any housing agency administering public housing or the Section 8 program on a statewide basis as well as with all PHAs that certify consistency with the state's consolidated

plan. While the consolidated planning process has always provided an opportunity for business and civic leaders to be consulted, grantees have tended to have limited outreach to for-profit entities. EnVision Centers view engaging the business community as a critical element and are relying on private enterprises to assist in identifying relevant training and employment opportunities. Coordinating both efforts could be an opportunity for grantees to expand their consultation process and develop a more robust consolidated planning process.

Determining Needs and Setting Priorities

Communities interested in implementing an EnVision Center have identified expanding economic opportunity as a priority need and goal. These communities will be committing to developing and implementing a plan to promote and expand economic opportunity. As a part of the goal of enhancing economic mobility for low income persons, they will be identifying skills gaps that exist in the community, particularly among distinct neighborhoods and demographics.

A consolidated planning process requires grantees to undertake a homeless and housing needs assessment and an analysis of its housing market. Both components include public and assisted housing. In addition, there are two other needs assessment components that can assist communities in identifying where EnVision Centers may be instrumental in meeting community needs. Under §91.205(b) and §91.305(b) a grantee is required to estimate, to the extent practicable, the number of persons who are not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents and any other categories the grantee may specify, and describe their supportive housing needs. Under §91.215(f) and §91.315(f), prior to a grantee's receipt of CDBG funding, the consolidated plan must also provide a concise summary of the grantee's priority non-housing community development needs. This community development component of the plan must state the grantee's long-term and short-term community development objectives, including economic development activities that create jobs. Grantees may want to include EnVision Center analysis as a part of its non-housing community development assessment to build consistency between the consolidated planning and EnVision Center planning processes.

Incorporating EnVision Centers in the Strategic Plan

Once a grantee has undertaken a needs assessment and market analysis, it next develops a strategic plan identifying the priorities and specific objectives it will address during the consolidated plan period. There are several areas within the strategic plan portion of the consolidated plan where a grantee may highlight work undertaken through an EnVision Center.

Highlighting Revitalization & Economic Empowerment Efforts

Under §91.215(g) and §91.315(g), grantees are encouraged to identify locally designated areas where geographically targeted revitalization efforts are carried out through multiple activities in a concentrated and coordinated manner. An EnVision Center mission aligns well with this component of the consolidated plan and grantees are encouraged to highlight the

EnVision Center community plan in this section. HUD also encourages grantees to consider pursuing a Neighborhood Revitalization Strategy Area (NRSA) designation for local jurisdictions or a Community Revitalization Strategy Area (CRSA) designation for states in neighborhoods where an EnVision Center is located. A NRSA or CRSA could augment a grantee's focus on economic empowerment of low-income residents and the EnVision Center's focus of promoting and expanding economic mobility. As an added benefit, when HUD approves a NRSA or CRSA the grantee can receive greater flexibility in the use of CDBG funds and meeting national objective requirements in certain activities. For additional information on NRAs see CPD Notice 16-16: Neighborhood Revitalization Strategy Areas in the CDBG Entitlement Program at <https://www.hudexchange.info/resource/5159/notice-cpd-16-16-nras-in-the-cdbg-entitlement-program/>. For additional information on CRSAs see CPD Notice 97-01: CDBG Community Revitalization in the State CDBG Program at <https://www.hudexchange.info/resource/2137/notice-cpd-97-01-cdbg-community-revitalization-in-state-cdbg-program/>.

Identifying Public Housing Priorities and Objectives

Addressing public housing is also a component of the strategic planning process, in which grantees identify the priorities and specific objectives to be addressed during the consolidated plan period. Under §91.215(c) and §91.315(c), a grantee must describe how it will address the needs of public housing, including its activities to expand accessible housing units under a Section 504 voluntary compliance agreement and to encourage public housing residents to become more involved in management and participate in homeownership. Where an EnVision Center has also identified these elements as a priority, the grantee could describe their efforts in the consolidated plan.

Aligning Anti-Poverty Strategy & Coordination Efforts

EnVision Centers are intended to build upon existing efforts to expand economic mobility. HUD recognizes a comprehensive and coordinated set of resources is required to help families and individuals move to self-sufficiency. Coordinated together, these two planning processes can strengthen outcomes for low- and moderate-income residents. Here are two areas where both anti-poverty strategies can be aligned within the consolidated plan.

Under §91.215(j) and §91.315(j), a grantee must provide a concise summary of its goals, programs, and policies for reducing the number of poverty-level families and how its goals, programs, and policies for producing and preserving affordable housing, set forth in the housing component of the consolidated plan, will be coordinated with other programs and services for which the grantee is responsible and the extent to which it will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the grantee has control. For entitlement grantees, these policies may include its policies for providing employment and training opportunities to Section 3 residents pursuant to 24 CFR Part 135. For State grantees, these policies also include how it coordinates with other programs such as Temporary Assistance for Needy Families (TANF) as well as employment and training programs and services for which the state is responsible. An EnVision Center, with its goal of providing

residents in public or assisted housing with access to economic mobility, can be included as a component of a grantee's anti-poverty strategy, particularly when the same stakeholders are involved in both planning processes.

EnVision Centers will be designed to encourage and create a platform for communities to collaborate with community supportive service providers, other businesses, foundations, nonprofit organizations, educational leaders, job training and workforce development organizations, and others to advance economic mobility. The consolidated plan also emphasizes the importance of collaboration. Under §91.215(l) and §91.315(l), a grantee must provide a concise summary of the jurisdiction's activities to enhance coordination among the Continuum of Care, public and assisted housing providers, and private and governmental health, mental health, and service agencies. The summary on coordination efforts must also address the jurisdiction's efforts to coordinate housing assistance and services for homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons who were recently homeless but now live in permanent housing. The consolidated plan must also describe the means of cooperation and coordination among the State and any units of general local government in the metropolitan area in the plan implementation. With respect to economic development, the jurisdiction should describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies.

Amending an Existing Consolidated Plan

CPD grantees do not need to wait until they initiate a new consolidated plan to incorporate an EnVision Center within its jurisdiction. A grantee that already has an approved consolidated plan may choose to amend it to incorporate an EnVision Center. Under §91.505, the grantee must make the amendment public and must notify HUD that an amendment has been made.

USING CPD FUNDING TO ALIGN WITH ENVISION CENTER PILLARS

CPD grantees will recognize that there are a variety of ways Community Development Block Grant (CDBG) (including Section 108 Loan Guarantees), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), Housing Trust Fund (HTF) and Housing Opportunities for Persons With AIDS (HOPWA) funding may be used in support of each of the EnVision Center pillars and the goal of enhancing economic mobility for low- and moderate-income persons. Grantees electing to use CPD funding toward EnVision Center efforts will document projects in their annual action plan and report on accomplishments in the annual performance report. Grantees should be aware that all selected activities must meet program-specific requirements, including recordkeeping requirements.

Duplicative Payments

As with all federal funding, CPD funds cannot be used to pay expenses that are already being paid for by another source. CPD grantees and subrecipients may use federal funds to

supplement existing funds for program activities but may not replace, also known as supplanting, nonfederal funds that have been appropriated for the same purpose. Supplanting occurs when a state, or local government reduces state or local funds for an activity specifically because federal funds are available (or expected to be available) to fund that same activity. In addition, federal funding may not replace state or local funding that is required by law.

ADDITIONAL RESOURCES

HUD has developed a variety of resources to assist grantees in completing the consolidated planning process including a citizen participation and consultation toolkit and a maximizing investments toolkit to help identify local housing and community development needs. These resources are located at <https://www.hudexchange.info/programs/consolidated-plan/guides/#consolidated-planning-toolkits>.

CONTACT INFORMATION

Grantees that have questions on this Notice should contact their HUD CPD Field Office Representative. Field Offices should direct inquiries and comments to the Entitlement Communities Division at 202-708-1577. For additional information on EnVision Centers grantees should contact their HUD FPM Field Office Representative. Field Offices should direct inquiries and comments to their EnVision Center designee and to EnVisionCenterDemonstration@hud.gov.