



April 22, 2020

Kimberly Johnson, CPD
Connie Casto, CPD
State of Nevada
U.S. Department of Housing & Urban Development
Email: Kimberly.D.Johnson@hud.gov
Email: Connie.k.Casto@hud.gov

Re : Comments on factors for consideration in the new HUD formula for the second phase of CARES Act funding for CDBG and ESG allocations

Dear Ms. Johnson and Ms. Casto,

On behalf of the Nevada Housing Coalition Board of Directors, I respectfully submit our comments regarding the factors for consideration in the new HUD formula for the second phase of distribution of CARES Act funding. We welcome this opportunity to help Secretary Carson develop a formula that ensures that the second phase of CARES Act funding for Community Development Block Grant (CDBG-CV) and Emergency Solutions Grant (ESG-CV) is reaching communities most impacted by COVID-19.

The Nevada Housing Coalition is a statewide, membership-based nonprofit that works to advance affordable housing options for all Nevadans which gives us a vested interest in mitigating the housing insecurities faced by our most vulnerable populations here in Nevada. We already know that housing instability and homelessness impact individuals beyond just their homes including their education and overall health, but in the COVID-19 reality, housing insecurity is a public health crisis. Both the CDBG-CV and ESG-CV have the potential to help offset the current and anticipated housing crisis through their respective eligible uses and this is critical nationally and also here in Nevada.

Factors for consideration in new HUD formula for Phase 2 of CARES Act funding

- **Low Income:** In addition to race, ethnicity and age, income should be a consideration in this significant factor. Research is showing that those with lower socioeconomic status are more likely to catch COVID-19 and also die from it. Those in lower income ranges have greater exposure and are more prone to underlying medical conditions with both housing instability and historically limited access to healthcare.
<https://www.nytimes.com/2020/03/15/world/europe/coronavirus-inequality.html>.

- **Unsheltered Homelessness:** Homelessness in general is an added risk factor for spreading COVID-19 and underlying medical conditions suggest the potential for higher mortality rates. Unsheltered homelessness has less controls in place with the potential for larger community-wide outbreaks of the virus. Unsheltered homelessness requires additional coordination across health departments, community organizations, law enforcement, and healthcare and public health workers. <https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/unsheltered-homelessness.html>
- **Affordable Housing Access and Percentage of Renters:** Access to affordable housing is a critical factor that may be reflected in the housing stock shortages and also in the percentage of households that rent, especially those that are extremely low income and severely cost burdened, spending more than 50% of their income on housing costs which puts these households at great risk during the COVID-19 period and the months following due to the economic impacts. <https://reports.nlihc.org/gap>
- **Economic Sector Consideration:** Job loss is a very significant factor which may want to be paired with economic sectors. Service industries overall will be represented by job loss, but entire economic sectors have a longer anticipated recovery including energy and tourism/travel. <https://www.brookings.edu/blog/the-avenue/2020/03/17/the-places-a-covid-19-recession-will-likely-hit-hardest/>
- **Number of Uninsured:** Access to healthcare is a contributing factor in underlying medical conditions and in surviving COVID-19. Another factor to be considered may be the number of uninsured. <https://www.kff.org/uninsured/fact-sheet/what-issues-will-uninsured-people-face-with-testing-and-treatment-for-covid-19/>

Thank you for your consideration of our feedback regarding the factors for the new HUD formula that will impact the CDBG-CV and ESG-CV funding distribution. Safe wishes to you both.

Sincerely,

William Brewer
Chairman
Nevada Housing Coalition

Sincerely,



Christine Hess
Executive Director
Nevada Housing Coalition