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CSP Eligibility: Making the Case for Back-Up Generators in HUD-Assisted Senior Housing

As the leading voice for aging in America, LeadingAge is thrilled that back-up generator costs were eligible for COVID-19 Supplemental Payment (CSP) reimbursement through HUD under the fourth round (and anticipated to be so in the forthcoming fifth round). Equipping the affordable senior housing portfolio with back-up power supply and other key disaster preparedness measures is a necessary step to allowing older adults to age independently with dignity and health.

Despite the expanded CSP eligibility category that included back-up generator installation, timing constraints in the fourth CSP round made it very challenging for housing providers to secure contracts for generators ahead of HUD's request deadline. Instead, many HUD-assisted senior housing providers are hoping to utilize fifth round CSP payments to install back-up generators.

LeadingAge is encouraging housing providers to take steps now to best position themselves for the next CSP notice, which in previous rounds came with infeasible timing requirements. These steps include lining up multiple bids as required by HUD. LeadingAge member experience shows that completing the necessary building specs and planning for generator installation takes quite a bit longer than anticipated and any steps that can be taken without cost to the owner are smart.

As housing providers begin their planning, they are running into issues around eligibility for generator reimbursement. One issue causing some uncertainty is which properties are eligible to seek CSP funds for back-up generators. LeadingAge encourages HUD to update the CSP language to broaden the eligibility, or to add a broader category for exceptions.

The fourth round CSP [FAQ](#) language about back-up generators clarifies the two eligibility requirements from the Notice:

- **Property is serving vulnerable elderly residents.** Designation as an elderly property is sufficient to meet the criteria. If a property serves families, the owner justification must discuss presence of an elderly resident population, for instance, by stating the percent of units occupied by elderly residents, and
- **The property has a documented risk of power outages that may necessitate temporary relocations.** This may be established in two ways: 1) by identifying that there has been at least one break in supply of electrical service by the utility provider of four hours or more to the subject property since January 1, 2019, or 2) if the property is located in an area covered by a Presidential Disaster Declaration issued since January 1, 2019. HUD may also consider other evidence of risk of recurring outages on a case-by-case basis. Outages may be due to grid failures, planned provider outages, or weather-related disruptions. If a narrative justification is required for the CSP request (requests exceeding the Standard amount only), please include approximate dates and general cause of the power outages, and if relevant, information on the Presidential Disaster Declaration.

The highlighted portion has been challenging for housing providers because there have been thankfully few major disasters within the prescribed limited timeframe (since 2019) in some parts of the country. In addition, some housing communities have experienced power loss, but not for four hours continuously.

HUD's stated intention of utilizing CSPs for generator installation is to allow older adults to safely shelter in place. We don't believe HUD intended for the eligibility requirements be so strict as to prevent housing communities serving older adults, many with chronic conditions, higher COVID risk, and mobility restrictions, from accessing CSP funds for their intended purpose of equipping senior properties with back-up generators.

As you know, a power outage that knocks out a building's elevators, changes the unit temperature drastically, and prevents the resident from accessing power supply for refrigerated medicine or electricity-powered oxygen displaces residents and often causes them to go to group shelters where they are very likely to be exposed to COVID-19 and other risks.

In other words, just because a property has not seen a lengthy outage or PDD in the last few years does not mean the property and its residents are not vulnerable to power outages and in need of generators as intended to be made available by CSPs funds. We'd love to see HUD's fifth round FAQs made more accommodating, and we value HUD regional support with HQ as a housing provider seeks clarification on if their project will be considered eligible for generators so that they can best position for the fifth round CSP.

We also encourage housing providers to explore other options for generator installation, including funds made available by state and local grants. For questions and support, reach out to jbilowich@leadingage.org.