

ANNE ARUNDEL COUNTY


Annual Action Plan

FY 2022



DRAFT





ANNE ARUNDEL COUNTY ANNUAL ACTION PLAN Local Fiscal Year 2022

County Executive
Steuart Pittman

Arundel Community Development Services, Inc.
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AP-05 Executive Summary

Introduction

The *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025* constitutes a strategic plan for addressing the County's housing and community development goals. The plan provides a comprehensive analysis of the needs of County residents and sets out specific goals, objectives and outcomes, which will be used to address those needs over a five-year period.

The *Anne Arundel County Annual Action Plan: Local Fiscal Year 2022* is the second annual addendum to the *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025*. The Action Plan outlines the resources allocated and the programs and projects selected through the County's budget process to achieve the Consolidated Plan's goals for the time period of July 1, 2021 to June 30, 2022.

Anne Arundel County will allocate approximately \$30,692,969 in federal entitlement, housing choice vouchers, and nationally competitive Continuum of Care funds from the U.S. Department of Housing and Urban Development (HUD) and equity from low income housing tax credits. These federal funds will be leveraged with State, County, foundation, and private funding to implement the County's housing and community development projects and programs.

Summarize the objectives and outcomes identified in the Plan

Vision Statement

Anne Arundel County has established the following vision statement that will guide its planning and budget process through the current Consolidated Plan process: Anne Arundel County will pursue housing and community development goals that create strong and vibrant communities through a range of affordable housing options and opportunities for all residents. Further, strategies across all goal areas will help promote equity, with a special emphasis on helping households at the lowest income levels, under-represented protected classes, and persons with special needs obtain housing and related support in diverse and inclusive communities.

Guiding Priorities

Prioritization for funding will be given to projects that meet the following guiding principles.

Affordable Housing

The County will make the creation and stabilization/preservation of affordable housing, as well as related services, its top housing and community development priority. Affordable housing that meets the specific needs of homeowners, renters, homeless and special needs populations will be given preference for funding.

Communities of Opportunity

To the extent possible, priority will be given to projects and programs creating new affordable housing units and building low income households ability to secure affordable housing in Communities of Opportunity (COOs). COOs are areas that have no or low concentrations of low and moderate income households, and that rank high on indices of quality of life. Generally, these are areas where there is a lack of both affordable rental and affordable homeownership units and a relatively lower number of Non-White and Hispanic residents.

Neighborhood Revitalization Areas

Revitalization efforts and public service dollars (operating funds) will be prioritized to three main neighborhood revitalization areas, which are the Severn, Brooklyn Park and Glen Burnie communities. These areas have their own unique assets and are targeted by the County for place based community development initiatives across a range of disciplines. At the same time, these areas contain a higher concentration of low and moderate income households, older – yet affordable – housing stock in need of updates, repairs, and other needs compared to the County as a whole. These communities have approved Sustainable Community Initiative (SCI) designations from the State of Maryland and are targeted for revitalization programs. The County’s SCI planning process involved thorough stakeholder engagement processes and needs assessments that resulted in an SCI Action Plan for each area.

Goals

Each project and program funded during this strategic plan period will meet one of the goals identified in the Consolidated Plan. The goals identified in the County’s Plan center around providing affordable housing and/or quality of life and better economic opportunities for the County’s low and moderate income residents. The goals are detailed in Table 7 of this Plan.

Evaluation of Past Performance

The County recently completed its fifth and final year of the Consolidated Plan for FY 2016 – FY 2020 meeting the majority of its goals and outcomes, as reported in the *Anne Arundel County Consolidated Annual Performance and Evaluation Report FY 2020*. Below is a summary of the cumulative accomplishments from the past five years (FY 2016 – FY 2020), demonstrating the County success at leveraging federal, State, and private funds to address the housing and community development needs of the County. Specifically, the County successfully addressed the following needs.

- ❖ Substantially rehabilitated or repaired 160 homes occupied by low and moderate income homeowners.
- ❖ Provided over 3,214 individuals with homeownership counseling, assisted 70 low and moderate income households purchase their first homes, and provided 1,030 homeowners with foreclosure prevention counseling.

- ❖ Acquired and rehabilitated 24 existing single family units, making them available for rent to income eligible households, providing both affordable workforce housing and neighborhood stabilization.
- ❖ Successfully completed three multi-family projects including (i) constructing 48 new affordable family units in Odenton (Berger Square), (ii) completing the comprehensive redevelopment of an existing public housing community, Burwood Garden, including the demolition and new construction of 100 family units (now called Heritage Overlook) in Glen Burnie; and (iii) began the process for redeveloping the Freetown Public Housing community in Pasadena including rehabilitating 154 existing family units and constructing 36 new family units.
- ❖ Initiated a new Financial Empowerment Program offering one-on-one counseling, as well as financial literacy workshops to 261 low income households.
- ❖ Supported the participation of approximately 1,552 households in the Boys & Girls Clubs and/or in the Self-Sufficiency Program in the public housing communities.
- ❖ Increased the supply of housing for the special needs populations in the County by acquiring and renovating five new “state of the art” group homes designed to meet the needs of the aging and disabled population.
- ❖ Provided tenant based rental assistance to 160 households diagnosed and living with HIV/AIDS; supported over 1,000 seniors with minor home repairs or congregate services, and assisted 36 low income homeowners obtain accessibility modifications.
- ❖ Prevented 1,845 households from becoming homeless; provided rapid re-housing for 228 homeless families; provided tenant based rental assistance to 861 chronically homeless individuals; provided shelter to 2,307 individuals; and provided outreach and supportive services to over 5,855 homeless individuals through mobile outreach teams and at day drop-in centers.
- ❖ Completed a comprehensive regional Analysis of the Impediments to Fair Housing; adopted a Fair Housing Ordinance; and solidified the duties and responsibilities of the Human Relations Commission.
- ❖ Provided economic opportunities, including job skills training and transportation assistance to 500 individuals and arts and recreation opportunities to 322 youth in the targeted neighborhood of Brooklyn Park.

During the last five years, the County continued to demonstrate its commitment to its vision to implement strategies and activities that would create and maintain affordable housing opportunities throughout Anne Arundel County. In addition to these accomplishments, the County and ACDS responded to significant community needs as a result of COVID-19 and the economic impact it has had in our low income communities during the latter portion of FY 2020. Some projects, such as the County's Housing Rehabilitation Program for homeowners, were temporarily paused while staff pivoted to implement social distancing and other safety measures, but are now back up and running. The County also initiated new programs, including the Eviction Prevention and Water Bill Relief Programs, opened a hotel based shelter for homeless individuals, and expanded the capacity of the County's network of community partners and food resources to provide emergency food assistance to households in need.

Summary of Citizen Participation Process and Consultation Process

ACDS prepared its Consolidated Plan on behalf of Anne Arundel County in accordance with 24 CFR Part 91 and the County Citizen Participation Plan. The Plan was developed in consultation with representatives from a wide variety of agencies and persons who might affect or be affected by its implementation. The planning process involved consultation and information gathering from a variety of entities. Consultation to establish and set goals occurred, essentially, throughout a five- year period leading up the publication of the Final Consolidated Plan in June of 2020. During that time, well-established groups met on a regular basis, including the Anne Arundel Affordable Housing Coalition, the Anne Arundel and Annapolis Coalition to End Homelessness (the Homeless Coalition), the Regional Fair Housing Group, and the HOPWA Planning Group. Additionally, staff regularly attended community meetings in the priority revitalization communities including Brooklyn Park, Glen Burnie and Severn communities to assess revitalization needs in the County. This ongoing consultation provided a rich context within which ACDS began the formal planning process in the Spring of 2019. The formal citizen participation planning process included three public hearings/forums and approximately 15 additional individual meetings and consultations, focus groups and presentations to stakeholder organizations and community groups in the County. Additional opportunities for public engagement were provided as part of the development of this Annual Action Plan and the FY 2022 Housing and Community Development Budget process. Two public hearings were conducted in addition to Council budget hearings. A 30-day public comment period is being provided for members of the public to review and comment on this Draft Annual Action Plan.

Summary of Public Comments

No substantial public comments have been received to date.

Summary of Comments or Views Not Accepted and Reasons for Not Accepting Them

No substantial public comments were received.

Summary

The County believes a community that creates and maintains a broad range of housing options for all members of the workforce is an economically strong community. By targeting and leveraging its housing and community development funding, the County will continue to increase its stock of quality, affordable rental housing by helping to facilitate the construction of new units and rehabilitate existing substandard units, preventing foreclosures, supporting the County's homeowners and public housing communities, preventing households from becoming homeless, as well as helping to house the homeless, and promoting the economic empowerment of its most vulnerable residents. The Local Fiscal Year 2022 Annual Action Plan outlines the County's efforts to continue implementing the goals and strategies developed in the planning process for the Anne Arundel County Consolidated Plan: FY 2021 – FY 2025. The County will also continue to be a good steward of its federal funding to build upon its success during the last Consolidated Plan period.

PR-05 Lead & Responsible Agencies

Describe agency/entity responsible for preparing/administering the Consolidated Plan

Table 1
Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	Kathleen M. Koch	Arundel Community Development Services, Inc.
HOME Administrator	Kathleen M. Koch	Arundel Community Development Services, Inc.
ESG Administrator	Kathleen M. Koch	Arundel Community Development Services, Inc.

Narrative

Arundel Community Development Services, Inc. (ACDS) functions as the lead agency for the housing and community development programs in Anne Arundel County. ACDS began operating on July 1, 1993 as a private nonprofit corporation created to address the housing and community development needs in the County. The Corporation is under contract with the County to plan, administer, and implement the federally funded CDBG, HOME, ESG, HOPWA, and Continuum of Care (CoC) Programs, as well as State and County funded housing and community development activities. Subrecipients, including nonprofit service providers and housing developers, implement many of the activities funded under these programs. Other activities, such as property rehabilitation, homeownership counseling, foreclosure prevention counseling, financial empowerment counseling, acquisition/rehabilitation of housing units, and tenant based rental assistance programs are carried out directly by ACDS staff. ACDS takes on many roles, including developer, lender, counselor, landlord and construction manager, which

necessitates having staff with a variety of skills and the ability to coordinate with many government agencies and departments to carry out a wide range of tasks.

Consolidated Plan Public Contact Information

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AP-10 Consultation

Introduction

Arundel Community Development Services, Inc. (ACDS) prepared the LOCAL FISCAL YEAR 2022 Action Plan on behalf of Anne Arundel County in accordance with 24 CFR Part 91 and the County's Citizen Participation Plan. The Anne Arundel County Consolidated Plan FY 2021 – FY 2025 was developed in consultation with representatives from a wide variety of agencies and persons who might affect or be affected by its implementation. The planning process for the Annual Action Plan formulation involves ongoing consultation and information gathering from a variety of entities throughout the year as staff participates in community meetings, as well as opportunities for public participation through two public hearings and on-going consultation with stakeholders.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

Both ACDS and the Housing Commission of Anne Arundel County (Housing Commission) attend monthly Core Group meetings with other County agencies and affiliates, including the Mental Health Agency, Health Department, Department of Social Services (DSS) and the Department of Aging and Disabilities. This enables a high level of coordination with the County Executive's staff and the head of each agency around issues affecting public and assisted housing programs and initiatives. As part of regular program development and implementation, ACDS and the Housing Commission work with various nonprofit agencies who provide wrap around services and case management support. The partners include Supportive Housing Developers, Omni Behavioral Health, The Arc Central Chesapeake Region, People Encouraging People, Anne Arundel County Mental Health Agency, Inc., and Vesta Health Services. The Housing Commission, ACDS staff and DSS staff also meet quarterly to review case files for clients

utilizing Continuum of Care (CoC) or HOPWA vouchers, and staff regularly attends the Commission on HIV/AIDS meetings to ensure services are coordinated.

Finally, as described below, ACDS coordinates the Homeless Coalition, which is the CoC planning group for the County, and the Housing Commission is an active member. This process provides ample opportunities to coordinate housing services with other member organizations and to develop the County's strategy to end homelessness.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Homeless Coalition – the County's Continuum of Care planning group – includes representatives from (i) the State, County, and City of Annapolis agencies administering mainstream resources; (ii) shelter and nonprofit services providers; (iii) organizations representing individuals diagnosed with mental health disorders, substance abuse, and HIV/AIDS; and (iv) formerly homeless persons, advocates, and others with roles, interests and responsibilities in addressing issues associated with homelessness in the County. The Homeless Coalition Board meets on a monthly basis to develop policies and procedures for operations, including the adoption of a Governance Charter. The monthly meetings focus on topics related to homelessness, including affordable housing, education, mental health and substance use, and workforce development. The Homeless Coalition also holds quarterly meetings, which provide training on evidence-based practices such as trauma-informed care and housing first strategies. There are various subcommittees to address the needs of homeless persons including coordinated entry, emergency shelter, chronic homelessness, and homelessness diversion.

The Homeless Coalition remains committed to ending chronic homelessness in the County and has established a targeted by-name housing list – the ACCESS Housing List – to prioritize the most vulnerable chronically homeless persons in the County. Service providers meet on a monthly basis in a subcommittee to coordinate services for the chronically homeless and to identify housing opportunities. The County also has a veteran by-name list, which it maintains in partnership with the Veterans Administration (VA) that is cross-referenced as part of the Homeless Coalition efforts to end veteran homelessness.

The Homeless Coalition was active in reviewing and finalizing the homeless goals and strategies outlined in this Plan. The Homeless Coalition also hosted roundtable discussions providing opportunity for the community to identify needs for the homeless population in the County.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate

outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Homeless Coalition is involved in determining the needs and setting priorities when allocating ESG funds, developing performance standards, evaluating outcomes, and developing policies and procedures for the administration of the Homeless Management Information System (HMIS). The Homeless Coalition has developed procedures for the operation and administration of the HMIS system, which is funded with County general funds and CoC funding. A committee, consisting of Homeless Coalition members currently utilizing the HMIS system, meets on a regular basis to review policies, update users on program changes and discuss other relevant issues associated with the use and management of the system. Currently, all grantees receiving ESG funds, as well as subrecipients receiving CoC funds, are required to enter data into the HMIS system.

In turn, this HMIS data, which has been vetted and evaluated by the Homeless Coalition Board and membership, informs the allocation of ESG funds and directly influenced the development of the goals and strategies outlined within the County's Consolidated Plan.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2
Agencies, groups, organizations who participated

1	AGENCY/GROUP/ORGANIZATION	HOUSING COMMISSION OF ANNE ARUNDEL COUNTY
	Agency/Group/Organization Type	Services –Housing Services – Homeless Services – Supportive Services Services – Youth Services
	What section of the Plan was addressed by Consultation?	Rental Housing Opportunities Homeownership Opportunities Promote Fair Housing Sustain Communities
2	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Commission of Anne Arundel County (Housing Commission) owns and manages the County public housing inventory and administers its Housing Choice Voucher Program. The Housing Commission is a member of the Homeless Coalition and is a strong partner with ACDS in developing tenant based rental assistance programs and other programs serving the housing needs of the lowest income residents. The Housing Commission was invited via e-mail to attend public hearings and provide comments on the draft Consolidated Plan. The Housing Commission senior staff participated in both public hearings associated with this Action Plan to help identify the rental housing and service needs of low income populations, public housing residents and the elderly.
	AGENCY/GROUP/ORGANIZATION	ARUNDEL HOUSE OF HOPE, INC.
	Agency/Group/Organization Type	Housing Services – Housing Services – Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was	Arundel House of Hope, Inc. (AHOH) is a non-profit ecumenical organization that provides emergency, transitional, and permanent affordable housing for the poor and

	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	those experiencing homelessness in Anne Arundel County. AHOH was invited via e-mail to attend public hearings and provide comments on the draft Plan, and then attended both public hearings associated with this action plan. The organization is a member of the Homeless Coalition and participated in both public hearings to identify homeless and housing needs and to recommend projects for funding.
3	AGENCY/GROUP/ORGANIZATION	ANNE ARUNDEL COUNTY DEPARTMENT OF AGING AND DISABILITIES
	Agency/Group/Organization Type	Services – Elderly Persons Services – Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Department of Aging and Disabilities manages County Senior Centers, programs for aging adults and services for adults with disabilities. The agency was invited via e-mail to attend public hearings and to provide comments on the draft Plan, and attended both public hearings associated with this action plan.
4	AGENCY/GROUP/ORGANIZATION	LANGTON GREEN, INC.
	Agency/Group/Organization Type	Housing Service – Adults with disabilities
	What section of the Plan was addressed by Consultation?	Promote Fair Housing Rental Housing Opportunities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Langton Green Inc. is a nonprofit organization provides residential living, supportive and other services to adults with disabilities. Langton Green, Inc. was invited via e-mail to attend public hearings to provide comments on the draft Plan. Staff attended both public hearings to assess needs for the next fiscal year.
5	AGENCY/GROUP/ORGANIZATION	KINGDOM KARE, INC.
	Agency/Group/Organization Type	Services – Children Services – Education
	What section of the Plan was addressed by Consultation?	Public Service – Youth Sustainable Communities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Kingdom Kare, Inc. is a nonprofit organization that provides high quality childcare services for all ages which includes after school programs and more recently—virtual learning services. Kingdom Kare, Inc. was invited via e-mail to attend public hearings and provide comments on the draft plan. The Executive Director attended one public hearing to provide input into the needs of young people.
6	AGENCY/GROUP/ORGANIZATION	COMMUNITY ACTION AGENCY OF ANNE ARUNDEL COUNTY
	Agency/Group/Organization Type	Services – Low to moderate income individuals and families
	What section of the Plan was addressed by Consultation?	Promote Fair Housing Prevent & End Homelessness Sustainable Communities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Action Agency of Anne Arundel County provides financial assistance, youth services, health services, and returning citizens services to low to moderate income Anne Arundel County residents. CAA was invited via e-mail to attend both public hearings and provide input into the FY 2020 budget process. CAA attended both hearings associated with this action plan.
7	AGENCY/GROUP/ORGANIZATION	ANNE ARUNDEL COUNTY DEPARTMENT OF AGING AND DISABILITIES
	Agency/Group/Organization Type	Services – Seniors Services – Adults with disabilities
	What section of the Plan was addressed by Consultation?	NON – Public Service – Seniors and adults with disabilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Anne Arundel County Department of Aging and Disabilities provides a wide variety of services for seniors and adults with disabilities. Staff was invited via e-mail to attend public hearings and provide comments on the draft plan. Staff participated in both public hearings to help identify the neighborhood needs of elderly residents and the disabled adults.
8	AGENCY/GROUP/ORGANIZATION	CALVARY ECONOMIC DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Services – Housing Services – Homeless
	What section of the Plan was addressed by Consultation?	Prevent & End Homelessness
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated	Calvary Community Economic Development Corporation is a nonprofit organization serving low income clients in the greater Glen Burnie area and northern Anne Arundel County with emergency eviction prevention assistance, food pantry items and counseling aimed at low income and very low income households. CCEDC was invited

	outcomes of the consultation or areas for improved coordination?	via e-mail to attend both public hearings and to provide comments on the draft Plan. The Executive Director attended one of the public hearings to help identify the housing needs and homeless prevention needs, as well as the needs for the very low income population.
9	AGENCY/GROUP/ORGANIZATION	ASSOCIATED CATHOLIC CHARITIES, INC.
	Agency/Group/Organization Type	Services – Housing Services – Elderly Persons Services – Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Associated Catholic Charities, Inc. develops, owns and operates several affordable senior housing communities and operates a homeless shelter – Sarah's House - within Anne Arundel County. Associated Catholic Charities, Inc. was invited e-mail to attend both public hearings and provide comments on the draft Plan. Staff participated in one public hearing associated with this Action Plan to help identify affordable housing and homeless needs, as well those needs for the elderly population.
10	AGENCY/GROUP/ORGANIZATION	OPPORTUNITIES INDUSTRIALIZATION CENTER OF ANNE ARUNDEL COUNTY, INC.
	Agency/Group/Organization Type	Services – Education Services – Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunities Industrialization Center, Inc. (OIC) of Anne Arundel County, Inc. is a nonprofit organization dedicated to providing education, job skills classes, and English classes to low income individuals in an effort to improve their economic situation. OIC was invited via e-mail to attend both public hearings and provide comments on the draft Plan. The Executive Director attended one public hearing and spoke on identifying economic development needs.
11	AGENCY/GROUP/ORGANIZATION	COMMUNITY LEGAL SERVICES, INC.
	Agency/Group/Organization Type	Services – Legal Services Services – Education
	What section of the Plan was addressed by Consultation?	Non- Legal support for low income residents Fair Housing Human Rights
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Legal services is a nonprofit organization dedicated to providing legal support to low-income individuals and families. They provide 5 brief legal advice clinics that has attorneys available for consultation. Staff was invited via e-mail to attend both public hearings and to provide comments on the draft Plan. Staff participated in one public hearing to help identify and address the needs of low-income adults needing legal support.
12	AGENCY/GROUP/ORGANIZATION	THE LIGHT HOUSE, INC.
	Agency/Group/Organization Type	Housing Services– Housing Search Assistance Services – Supportive Services
	What section of the Plan was addressed by Consultation?	Prevent & End Homelessness
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Light House Inc., is a nonprofit organization dedicated to providing housing services to those who are experiencing homelessness. Staff was invited via e-mail to attend the public hearings and provide comments on the draft Plan. The Light House Inc., attended both hearings to help identify the needs for homeless population.
13	AGENCY/GROUP/ORGANIZATION	ANNE ARUNDEL COUNTY DEPARTMENT OF SOCIAL SERVICES
	Agency/Group/Organization Type	Services – Children Services – Homeless Child Welfare Agency Other government – Local
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was	The Anne Arundel County Department of Social Services (DSS) serves as a point of contact for safety net programs serving the most vulnerable and needy residents. DSS

	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	is a member of the Homeless Coalition and was invited via e-mail to attend both public hearings and to provide comments on the draft Plan. Staff participated in one public hearing to help identify housing and service needs and to address the needs of the homeless.
14	AGENCY/GROUP/ORGANIZATION	BELLO MACHRE, INC.
	Agency/Group/Organization Type	Services – Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bello Machre, Inc. is a supportive housing provider serving adults with developmental disabilities. Staff was invited via e-mail to attend both public hearings and provide comments on the draft Plan. Staff participated in one public hearing and provided input on accessible housing needs of adults with developmental disabilities.

AP-12 Participation

Summary of citizen participation process/efforts made to broaden citizen participation. Summarize citizen participation process and how it impacted goal-setting

ACDS prepared the Local Fiscal Year 2022 Action Plan on behalf of Anne Arundel County in accordance with 24 CFR Part 91 and the County's Citizen Participation Plan. The initial Consolidated Plan was developed in consultation with representatives from a wide variety of agencies and persons who might affect or be affected by its implementation. The planning process for the Action Plan formulation involves ongoing consultation and information gathering from a variety of entities throughout the year as staff participates in community meetings, as well as opportunities for public participation through two public hearings. During the Local Fiscal Year 2022 Action Plan and budget planning process, ACDS held two public hearings – one on October 29, 2020 and one on February 24, 2021, which enabled citizens and other stakeholders to participate in the goal-setting process.

ACDS held two public hearings to inform the County's development of this Action Plan. Notice of both public hearings were published in The Capital Gazette newspapers, and on the ACDS website. All notices indicated special accommodations, including the fact that sign language or foreign language interpreters could be arranged if needed. Concurrently, an email notice was sent to the Housing and Community Development Stakeholder list inviting stakeholders to attend the public hearings. Similarly, an email notice was sent to the Housing and Community Development Stakeholder list inviting stakeholders to comment on the draft Action Plan, while notice of the availability of the draft Plan was published on Wednesday, April 28, 2021 in the Capital Gazette newspapers. The draft Plan was made available for download on the ACDS website or at the ACDS office on Wednesday, April 28, 2021. Public comments will be received through Thursday, May 27, 2021 at 5:00 p.m. This citizen participation process provided ample time for all interested parties and stakeholders to review the draft Plan and to provide comments, reactions, and input.

In addition, established groups – including the Anne Arundel Affordable Housing Coalition, the Homeless Coalition, and the Regional Fair Housing Group – meet on a regular basis.

Additionally, staff attends community meetings in Priority Revitalization Communities including Brooklyn Park, Glen Burnie and Severn communities to assess revitalization needs. Also, ACDS, through its Property Rehabilitation, Homeownership Counseling, Foreclosure Prevention Counseling and Financial Literacy Programs, meets regularly with many low and moderate income households, enabling staff to assess the needs of the community. These ongoing consultations provide a rich context in which ACDS continues an ongoing, fluid planning and implementation process.

Table 3
Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response / Attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearings on October 20 2020 and February 24 2021	Minority populations Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Approximately 40 people attended each of the two Public Hearings	Comments received include the need for: affordable housing especially for renters and eviction prevention; The need for basic resources, including food and utility assistance in the wake of COVID-19 was shared. The need for remote learning and child care resources was shared, in the wake of COVID-19. Comments received included appreciation for funds.	Comments accepted	
2	Newspaper Ad	Minority populations Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notice of the availability of the draft Annual Action Plan for Local Fiscal Year 2022 (Federal Fiscal Year 2021) will be published on Wednesday, April 28, 2021 in The Capital Gazette newspapers for a 30- day comment period. The notice included a listing of each project proposed for funding, the amount of funding, the location of the project, and the proposed number of beneficiaries for			

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response / Attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
			each project, and funding contingency plan. In addition, the notice stated that access to the draft Plan would be available online for public review and at the office of ACDS.			
3	Internet Outreach	Minority populations Non-English Speaking - Specify other language: Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notice of the availability of the draft Action Plan as well as a copy of the Public Notice was emailed to the ACDS Community Development Stakeholder list and posted on the ACDS website. This list includes individuals and organizations that received funding or applied for funding; representatives of community organizations and County agencies who serve low and moderate income persons, elderly or special needs individuals; representatives of public housing communities; and other community activists. The notice stated that access to the draft Plan would be available for the public's review online and at the office of ACDS.			www.acdsinc.org

AP-15 Expected Resources

Introduction

The Anne Arundel County Action Plan for Local Fiscal Year 2022 describes how the County plans to expend its federal housing and community development resources from July 1, 2021 to June 30, 2022. This Action Plan establishes how the County will address the needs and achieve the goals as stated in the *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025*.

During Local Fiscal Year 2022, approximately \$30,692,969 in federal resources (including local funds) is planned for allocation to housing and community development activities in Anne Arundel County. These funds, outlined in detail herein, are a combination of entitlement grants, program income, required local match dollars, Federal Fiscal Year 2020 Continuum of Care award funds, Housing Choice Voucher funds, and estimated Housing Counseling Grant funds. Additionally, four affordable housing developers have successfully applied for Low Income Housing Tax Credits (LIHTC) for four multi-family projects.

ACDS administers the majority of these federal funds on behalf of the County and works closely with other County agencies, State agencies and nonprofit providers. On behalf of the County, the Housing Commission administers and manages Public Housing funds and the Housing Choice Voucher Program.

Table 4
Expected Resources Priority

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$2,145,963	\$600,000	\$3	\$2,745,966	\$6,655,664	Community Development Block Grant (CDBG) funds is a flexible program that provides communities the resources to address housing and community development needs.
HOME	public - federal	Acquisition Homebuyer Assistance Homeowner Rehab Multi-family Rental New Construction Multi-family Rental Rehab New Construction for Ownership TBRA	\$772,691	\$875,000	\$0	\$1,647,691	\$3,497,204	HOME Investment Partnerships Program (HOME) provides communities with the resources to fund a wide range of activities including building, buying, and/or rehabilitation affordable housing for rent or homeownership or providing direct rental assistance to

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$		
								low-income households.
ESG	public - federal	Conversion and Rehab for Transitional Housing Financial Assistance Overnight Shelter Rapid Re-housing (rental assistance) Rental Assistance Services Transitional Housing	\$180,964	\$0	\$0	\$180,964	\$439,474	Emergency Solution Grant (ESG) funds provide communities with flexible funds to address the needs of the homeless.
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Rapid Re-housing (rental assistance) Rental Assistance Services TBRA Other	\$2,459,396	\$0	\$0	\$2,385,199	\$5,962,998	Competitive McKinney-Vento Homeless Assistance Act funds are applied for annually to support programs serving the homeless in Anne Arundel County. Funds are used to provide permanent supportive housing, case management, and transitional housing to homeless families and individuals.
Other	public - federal	Housing TBRA	\$21,300,000	\$0	\$0	\$21,300,000	\$55,900,000	The Housing Commission administers the Housing Choice Voucher Program, which provides tenant based rental assistance.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$		
Other	public - federal	Services TBRA	\$563,955	\$0	\$0	\$563,955	\$1,320,648	HOPWA funds will be used for tenant based rental assistance for persons with AIDS.
Other	public - local	Acquisition Admin and Planning Homebuyer Assistance Homeowner Rehab Housing Multi-family Rental New Construction Multi-family Rental Rehab TBRA	\$270,000	\$0	\$0	\$270,000	\$684,000	County Funds are provided to meet the required HOME match.
Other	public - local	Homebuyer Assistance Housing Multi-family Rental New Construction Multi-family Rental Rehab Services	\$3,000,000	\$0	\$0	\$3,000,000	\$8,445,000	County funds are provided for homeownership counseling, financial literacy, and foreclosure prevention counseling programs, rental housing development, Tenant Based Rental Assistance Program and supportive services, fair housing activities, and neighborhood specific activities.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The County gives priority to projects where there is owner equity or a commitment of private or other public financing. For example, the County will allocate HOME Investment Partnerships Program (HOME) and local match funds for the Rental Housing Production Program. These funds will support the acquisition and rehabilitation or new construction of affordable multi-

family housing. Typically, these projects cost millions of dollars and leverage equity raised from federal LIHTC, State funds and private dollars. During Local Fiscal Year 2022 (FFY 2021), significant resources are anticipated to be generated from the sale of LIHTC to use towards the development of four new affordable housing developments in Anne Arundel County.

The County also applies for State funds whenever the opportunity arises. For example, State Baltimore Regional Neighborhood Initiative (BRNI) funds have been awarded to ACDS to acquire and rehabilitate units in the Brooklyn Park community. In Local Fiscal Year 2022, ACDS anticipates receiving approximately \$150,000 in BRNI funds to continue efforts in Brooklyn Park. These funds will be leveraged with County General funds, CDBG funds, and State Lead-Based Paint Program funds.

ACDS offers a HOME and/or CDBG funded program which provides mortgage assistance to income eligible first time homebuyers. This program leverages both State and private funds through the Maryland Mortgage Program or private financing.

ACDS also administers the Homeownership Counseling and Foreclosure Prevention Counseling Programs for the County. The County funds provided for these programs are leveraged with federal and State dollars. ACDS has been awarded competitive federal Homeownership Counseling Program funds, Maryland Homeownership Counseling Fund monies, and National Foreclosure Mitigation Counseling Program funds.

ACDS also administers the Video Lottery Terminal (VLT) fund proceeds and the County Community Support Grant funds that are awarded to nonprofit organizations and community associations. These funds are frequently used to supplement federal and State funds, such as the Sarah's House Family Shelter at Ft. Meade.

The Property Rehabilitation Program leverages State funds through the Maryland Special Loans Program. In addition, homeowners in certain neighborhoods can obtain up to \$25,000 in State Lead-Hazard Reduction Grant Program funds to eliminate lead-based paint hazards from their homes.

The County will invest approximately \$3 million in additional general funds into housing and community development programs this year, as well as waiving or reducing impact or connection fees for the production of certain types of affordable units.

Anne Arundel County was awarded \$2,459,396 in Continuum of Care program funds through the 2020 NOFA. These funds will leverage, at a minimum, \$614,849 from County, State, and private sources for projects serving homeless persons. Anne Arundel County further leverages its federal funds – both ESG and CoC – with State funds and anticipate receiving a State Homelessness Solutions Grant in the amount of \$642,500. The grant helps support outreach,

shelter, prevention, and rapid re-housing programs. Additionally, the County has been awarded new State Emergency Housing Program funds from the Relief Act in the amount of \$1,017,157 which will help with emergency shelter and short term rent assistance. Finally, the County continues to benefit from ESG-CV awards which has allowed for the County to expand shelter, outreach, and rapid re-housing options in FY 2022.

The County ensures all of the federally required match funds are being provided and in many cases, exceeds the requirement. The HOME Program requires every one dollar in federal funds expended be matched by the County with at least \$.25 in local funds. The match required for the HOME Program in Local Fiscal Year 2022 is \$173,856 and the County will meet this obligation through the allocation of general funds.

ESG funds, appropriated for emergency shelter and rapid re-housing activities (\$85,000), have been awarded to Sarah's House Family Shelter, which is operated by Associated Catholic Charities, Inc. (Catholic Charities). Catholic Charities also budgeted \$363,128 in private contributions, \$247,800 in United States Army Funds, \$345,000 in Anne Arundel County funds, \$80,000 in Video Lottery Terminal funds, \$10,000 MEFP government grants and \$10,000 in private grants. These matching funds, in conjunction with the ESG funds, will be used for case management, supportive services and the operations of Sarah's House emergency family shelter. The remaining ESG funds (\$57,932) will be awarded to Arundel House of Hope, Inc. (AHOH) and (\$25,000) The Light House, Inc. to operate Rapid Re-Housing Programs. Both programs will meet the required match and provide funds to cover a portion of the case management services and administrative cost associated with the management of the grant.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

One of the best ways to reduce the cost of new housing is to reduce the cost of land, as land is one of the largest cost factors in housing construction. As land prices rise, those costs are passed on to purchasers in the form of higher housing prices. The County owns surplus land, which provides an opportunity for a creative approach using underutilized government owned property for the construction of new housing. When the County surpluses residentially zoned property and makes it available for new home construction, it provides an opportunity to greatly reduce the cost of building and thereby making the home available at a much lower cost to first time homebuyers. This program has been very successful in the past, and the County will continue to seek opportunities to provide low or no cost land for new affordable housing construction.

Discussion

Anne Arundel County works diligently toward leveraging all of its federal dollars with other sources of funds. The County regularly works with local elected officials, the State and federal

legislators, the State housing finance agency, and private developers to leverage funding with non-federal and non-entitlement sources for housing and community development projects. The County has invested a significant amount of County funds into housing and community development programs to complement federal and State resources. In addition, subrecipients of federal CDBG public service funds and the Continuum of Care (CoC) program fund use private foundations, private fundraising, as well as volunteers and in-kind services to fully fund these programs.

AP-20 Annual Goals and Objectives

Table 5
Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeownership Opportunities	2020	2024	Affordable Housing Non-Homeless Special Needs	Neighborhood Revitalization Area – Brooklyn Park Neighborhood Revitalization Area – Glen Burnie Neighborhood Revitalization Area – Severn	Affordable Housing – Owner Special Needs - Housing	CDBG: \$737,281 HOME: \$400,000 County - General: \$406,500 County-Match: \$100,000	Public service activities for Low / Moderate Income Housing Benefit: 650 Persons Assisted Homeowner Housing Rehabilitated: 30 Households Housing Unit Direct Financial Assistance to Homebuyers: 12 Households Assisted
2	Rental Housing Opportunities	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	Communities of Opportunity	Affordable Housing Rental Development Affordable Housing Rental Assistance and Services Affordable Housing Public Housing Special Needs Housing Special Needs Facilities and Services	CDBG: \$1,174,490 HOME: \$9,61,422 County - General: \$1,904,144 County Match: \$73,856 HOPWA: \$541,397	Public service activities other than Low / Moderate Income Housing Benefit: 35 Persons Assisted Rental Units Rehabilitated: 29 Household Housing Unit Tenant-Based Rental Assistance / Rapid Rehousing:

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
						Public Housing Services		30 Households Assisted
3	Prevent and End Homelessness	2020	2024	Affordable Housing Homeless		Homeless Housing Homeless Shelter and Services Homeless Prevention	CDBG: \$165,000 ESG: \$167,392 Competitive McKinney-Vento Homeless Assistance Act: \$2,348,864 County General: \$252,000	Public service activities other than Low / Moderate Income Housing Benefit: 690 Persons Assisted Tenant-Based Rental Assistance / Rapid Rehousing: 247 Households Assisted Homeless Person Overnight Shelter: 310 Persons Assisted Homelessness Prevention: 68 Persons Assisted
4	Sustainable Communities	2020	2024	Non-Homeless Special Needs Non-Housing Community Development		Special Needs - Facilities and Services Non-Housing Community Development - Public Service	CDBG: \$100,000 County - General: \$35,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted Other: 1 Other
5	Economic Opportunities	2020	2024	Non-Homeless Special Needs Non-Housing Community Development		Special Needs - Facilities and Services Economic Opportunities	CDBG: \$20,000	Public service activities other than Low / Moderate Income Housing Benefit: 60 Persons Assisted
6	Promote Fair Housing	2020	2024	Affordable Housing Fair Housing			County - General: \$8,000	Other: 1 Other
7	Administration of Federal Funds	2020	2024	Administration			CDBG: \$549,192	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
							HOME: \$151,269 ESG: \$13,572 Competitive McKinney-Vento Homeless Assistance Act: \$110,532 County - General: \$463,500 HOPWA: \$22,558	

Table 6
Goals Descriptions

GOAL 1 – HOMEOWNERSHIP OPPORTUNITIES

Increase and sustain affordable homeownership opportunities that are accessible and inclusive for low to moderate income County residents.

1. **Increase homeownership opportunities through programming.** Increase sustainable homeownership and wealth building opportunities through programming for first time homebuyers and protected classes. Examples include:

- ❖ Homebuyer and credit counseling
- ❖ Foreclosure prevention counseling
- ❖ Down payment, closing cost, and mortgage write down assistance

5 Year Outcome Goal: 2,475 persons, 60 households

2. **Increase supply of affordable homeownership units.** Increase supply of quality affordable owner occupied housing in inclusive communities. Examples include:

- ❖ Affordable financing for acquisition and construction
- ❖ Utilization of County owned surplus land
- ❖ Land use incentives and requirements such as inclusionary zoning policies and workforce housing incentive

5 Year Outcome Goal: 363 units

3. **Improve the quality of existing affordable homeownership units.** Improve and maintain existing stock of affordable units through affordable financing and project management for improvements. Examples include:

- ❖ Property rehabilitation for homeowners
- ❖ Energy efficiency improvements for homeowners
- ❖ Acquisition/rehabilitation program for homebuyers
- ❖ Disaster mitigation activities

5 Year Outcome Goal: 175 units

4. **Improve accessibility of homeownership units.** Facilitate improvements through affordable financing and project management and promote activities that support the elderly and those with disabilities to remain in their homes. Examples include:

- ❖ Accessibility Modifications Program for Homeowners

5 Year Outcome Goal: 25 units, 500 households

5. **Market affordable homeownership opportunities to protected classes within the County.** Ensure homeownership programs and opportunities are affirmatively marketed throughout the County and to protected classes with limited income, including minorities and persons with special needs. Examples include:

- ❖ Direct mailings and email marketing
- ❖ Attendance at outreach events, festivals, community meetings and informational sessions hosted by groups representing and/or serving the protected classes

5 Year Outcome Goal: Process Outcome**GOAL 2 – RENTAL HOUSING OPPORTUNITIES**

Promote and expand affordable quality rental housing opportunities that are accessible and inclusive.

1. **Increase the supply of affordable rental units.** Encourage the development of new rental units, with priority given to projects for families in communities of opportunity where affordable rental may be lacking. Examples include:

- ❖ Low interest financing programs
- ❖ PILOT Agreements
- ❖ County surplus land
- ❖ Land use incentives and requirements such as inclusionary zoning policies, workforce housing incentive and allowances for housing for elderly of modest means

5 Year Outcome Goal: 250 units

2. **Improve and preserve the existing stock of affordable rental housing.** Finance the renovation of existing affordable housing developments, including public housing, as well as smaller, scattered site developments. Examples include:

- ❖ Scattered site rental development through acquisition/rehabilitation
- ❖ Low interest financing
- ❖ Rental Assistance Demonstration (RAD) conversions
- ❖ Disaster mitigation activities

5 Year Outcome Goal: 317 units

3. **Create and maintain accessible rental housing units.** Provide financing and project management to develop group homes and make accessibility modifications or other improvements to existing group homes and rental units serving persons with disabilities and older adults. Examples include:

- ❖ Accessibility Modifications Program for Renters
- ❖ Group Home Rehabilitation Program

- ❖ Group Home Acquisition/Rehabilitation Program
- ❖ New group home development
- ❖ Ensure a portion of units in large rental developments can serve persons with disabilities

5 Year Outcome Goal: 45 units

4. **Expand, maintain and create affordable rental opportunities.** Support demand side subsidies and programs that allow low income families and persons with special needs to afford market rate rental units, with an emphasis on accessing units in communities of opportunity. Examples include:

- ❖ Tenant Based Rental Assistance for low income families and individuals
- ❖ Tenant Based Rental Assistance for persons with HIV/AIDS
- ❖ Tenant Based Rental Assistance for persons with disabilities, including mental illness and substance abuse disorders
- ❖ Explore higher rent payments for utilization in communities of opportunity

5 Year Outcome Goal: 200 units

5. **Implement support services and programs that help tenants access and retain housing.** Services may be geared to help homeless families and individuals, extremely low income families, persons with disabilities including mental illness and substance abuse, and returning citizens. Examples include:

- ❖ Case management and housing location assistance
- ❖ Landlord outreach and mitigation to encourage acceptance of vouchers for hard to house clients
- ❖ Congregate services for older adults

5 Year Outcome Goal: 175 persons, 125 households

6. **Market affordable rental opportunities to protected classes within the County.** Ensure affordable rental units and TBRA assistance are affirmatively marketed throughout the County to the protected classes within the County and that rental units and programs are provided in adherence to the County fair housing laws. Examples include:

- ❖ Affirmative marketing requirements for subrecipients
- ❖ Fair housing training for property managers
- ❖ Tenant/landlord information and fair housing resource line

5 Year Outcome Goal: Process Outcome

GOAL 3 – PREVENT AND END HOMELESSNESS

Prevent and end homelessness by providing a comprehensive homelessness response system.

1. Prevent homelessness. Provide financial assistance and counseling to households who are at risk of losing their homes; provide financial assistance to households to obtain new housing if they can no longer stay where they currently reside. Examples include:
<ul style="list-style-type: none"> ❖ Eviction prevention assistance ❖ First month rent and security deposit assistance ❖ Financial coaching ❖ Referral services
5 Year Outcome Goal: 550 persons
2. Increase and sustain housing opportunities for the homeless. Maintain and expand the supply of permanent supportive housing options, rapid re-housing assistance, and necessary support available to homeless individuals and families to get them quickly re-housed; maintain and expand the supply of permanent supportive housing and related services for chronically homeless individuals. Examples include:
<ul style="list-style-type: none"> ❖ Tenant Based Rental Assistance ❖ Rapid re-housing programs ❖ Case management services ❖ Development of permanent supportive housing units
5 Year Outcome Goal: 860 households
3. Maintain and enhance emergency shelter and interim housing options. Maintain and enhance emergency shelters serving families, victims of domestic violence and individuals as a temporary and safe housing option with the purpose of those served becoming quickly re-housed and economically secure. Examples include:
<ul style="list-style-type: none"> ❖ Maintenance and enhancement of existing shelters ❖ Operating support for emergency shelters and interim housing options
5 Year Outcome Goal: 1,500 persons
4. Improve the Homelessness Response System. Expand the Coordinated Entry System to include a continuum of services and support, including diversion and prevention services, entry into shelters, and permanent housing. Offer a variety of supportive service to assist homeless individuals and families maintain their housing. Support and enhance the capacity for the community to end homelessness through data, coordination, and planning. Examples include:
<ul style="list-style-type: none"> ❖ Operating support for day programs ❖ Case management ❖ Mental health programs ❖ Employment, education and training services, life skills and workplace training ❖ Child care programs ❖ Financial coaching ❖ Outreach programs ❖ Homeless Management Information Systems (HMIS), coordinated entry and assessment, and planning activities
5 Year Outcome Goal: 3,500 persons

GOAL 4 – SUSTAINABLE COMMUNITIES

Create sustainable, vibrant, inclusive communities by investing in revitalization projects, facilities and programs serving low income communities throughout the County, with priority given to communities in the designated Neighborhood Revitalization Areas.

Support initiatives that improve quality of life for communities. Fund projects, facilities and programs that improve the quality of life for low and moderate income persons and households, with priority given to communities within the designated Neighborhood Revitalization Areas and Housing Commission managed communities. Examples include:

- ❖ Community facilities
- ❖ Revitalization of blighted structures
- ❖ Projects and programs to support positive youth development
- ❖ Projects and programs to support older residents
- ❖ Preservation of historic structures in minority communities

5 Year Outcome Goal: 1,830 persons

GOAL 5 – ECONOMIC OPPORTUNITIES

Support programs, facilities and projects providing opportunities for low and moderate-income persons, including those with special needs, to gain skills, economic stability and independence in order to be productive members of the community, with a priority for services located within the designated Neighborhood Revitalization Areas.

Promote Independence. Assist programs and services that help low and moderate income County residents achieve financial and economic independence through better access to employment opportunities and supports. Examples include:

- ❖ GED Prep and ESOL courses
- ❖ Workforce development support programs
- ❖ Transportation services and support
- ❖ Child care services
- ❖ Day and vocational facilities for persons with special needs

5 Year Outcome Goal: 320 persons

GOAL 6 – PROMOTE FAIR HOUSING

Promote and further fair housing throughout the County and the region and improve access to housing opportunities for members of the protected classes.

Implement the local and regional fair housing action plans. Examples may include:

- ❖ Support for fair housing testing and enforcement activities
- ❖ Fair housing outreach and education
- ❖ Support for a regional fair housing coordinator

5 Year Outcome Goal: Implementation of fair housing action plans

AP-35 Projects

Introduction

The Anne Arundel County Consolidated Plan: FY 2021 – FY 2025 contains a strategic plan for addressing the housing and community development needs in the County. This Plan provides a comprehensive analysis of the needs of County residents and sets out specific goals, strategies, and outcomes to address the needs over a five-year period. This section outlines how the funds available during Local Fiscal Year 2022 will be used to achieve the goals and outcomes outlined in the Plan.

The projects, programs, and activities outlined in this section were selected to address the priority needs, goals, strategies, and outcomes, outlined in Table 2, developed through an intensive public planning process and analysis based on data received through a housing market study and needs assessment. Through this planning process, the County identified specific strategies to address the needs in the following goal areas: (i) Homeownership Opportunities; (ii) Rental Housing Opportunities; (iii) Prevent and End Homelessness; (iv) Sustainable Communities; (v) Economic Opportunities, and (vi) Promote Fair Housing. The following projects, programs and activities funded with County entitlement funds – CDBG, HOME, and ESG – seek to address the priority needs and to meet the goals identified in the Consolidated Plan. Other projects, funded with other federal dollars, such as CoC or HOPWA funds, designed to address the other goal areas, are discussed throughout the remaining sections of this Action Plan.

**Table 7
Project Information**

	Project Name
1	CDBG Administration
2	CHDO Housing Acquisition and Rehabilitation Program
3	Chesapeake Arts Scholarship Program
4	Emergency Assistance Program
5	ESG 21 Anne Arundel County
6	Family Stability Prevention Extension Program
7	Freetown Village Boys & Girls Club
8	HOME Administration
9	Homeless Resource and Outreach Center

10	Homeless Outreach Team
11	Langton Green: Housing Rehabilitation
12	Meade Village Boys & Girls Club
13	Mortgage Assistance Program
14	OIC Education and Job Training Program
15	Property Rehabilitation Program
16	Rehabilitation Advisory Services
17	Rental Housing Production Program
18	Repairs With Care Program
19	Scattered Sites Rental Program
20	Services for Seniors Aging in Place
21	The Light House Family Program

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The main vision guiding the *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025* is to pursue housing and community development goals that create strong and vibrant communities through a range of affordable housing options and opportunities for all residents. Further, strategies across all goal areas will help promote equity, with a special emphasis on helping households at the lowest income levels, underserved protected classes, and persons with special needs obtain housing and related support in diverse and inclusive communities. Given the severe housing cost burden and risk of homelessness experienced by those at the lowest end of the economic spectrum, the County's limited federal resources will be prioritized for the stabilization and expansion of affordable housing. An expanded supply of workforce housing will enable health aides, hospitality and retail workers, teacher aides, daycare workers, and other low and moderate income workers from the public, private and nonprofit sectors to live and be productive citizens of Anne Arundel County.

To the extent possible, priority will be given to projects and programs creating new affordable housing units and building low income households ability to secure affordable housing in Communities of Opportunity (COOs). COOs are areas that have no or low concentrations of low and moderate income households, and rank high on indices of quality of life. Generally, these are areas where there is a lack of both affordable rental and affordable homeownership units and a relatively lower number of Non-White and Hispanic residents. Revitalization efforts and public service dollars (operating funds) will be prioritized to three main neighborhood revitalization areas, which are the Severn, Brooklyn Park and Glen Burnie communities. These areas have their own unique assets and are targeted by the County for place based community development initiatives across a range of disciplines. At the same time, these areas contain a higher concentration of low and moderate income households, older – yet affordable – housing stock in need of updates and repairs, and other needs compared to the County as a whole. These communities have approved Sustainable Community Initiative (SCI) designations from

the State of Maryland and are targeted for revitalization programs. The County SCI planning process involved thorough stakeholder engagement processes and needs assessments that resulted in an SCI Action Plan for each area.

During Local Fiscal Year 2022, the County will use this vision as defined in the Consolidated Plan, to target its limited resources. As in previous years, increasing affordable housing options through various methods continues to be a priority.

AP-38 Project Summary

Table 8
Project Summary Information

1	PROJECT NAME	CDBG ADMINISTRATION
	Target Area	
	Goals Supported	Administration of Federal Funds
	Needs Addressed	
	Funding	CDBG: \$549,192
	Description	Funds will be used for general management, planning, oversight, and coordination of community development activities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Arundel Community Development Services, Inc., 2666 Riva Road, Suite 210, Annapolis, MD 21401
	Planned Activities	Funds will be used for general management, planning, oversight, and coordination of community development activities.
2	PROJECT NAME	CHDO GROUP HOME ACQUISITION AND REHABILITATION
	Target Area	
	Goals Supported	Rental Housing Opportunities
	Needs Addressed	Special Needs – Housing
	Funding	HOME: \$115,904 County-Match: \$28,976
	Description	CHDO Group Home Acquisition and Rehabilitation Program funds (at least 15 percent of the HOME allocation) are reserved for housing developed, owned, or sponsored by a Community Housing Development Organization (CHDO). Funds will be used to continue this multi-year program to acquire and/or rehabilitate housing to serve persons with special needs. Strategy: Create and Maintain Accessible Rental Housing Units Objective: Provide Decent Affordable Housing Outcome: Affordability
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that one group home will be acquired and constructed/rehabilitated. Typically, these group homes serve three to four individuals with disabilities.
	Location Description	The Program will be offered Countywide.
	Planned Activities	In Local Fiscal Year 2022, funds will be allocated to the HOME funded Community Housing Development Organization (CHDO) Group Home Acquisition and

		Rehabilitation Program. These funds will be made available to a certified CHDO to acquire and/or renovate housing to serve special needs populations. ACDS, on behalf of the County, is working with CHDO certified special needs housing providers to identify potential projects for the upcoming year. It is anticipated one group home will be developed during the fiscal year.
3	PROJECT NAME	CHESAPEAKE ARTS CENTER SCHOLARSHIP PROGRAM
	Target Area	Neighborhood Revitalization Area – Brooklyn Park
	Goals Supported	Sustainable Communities
	Needs Addressed	Non-Housing Community Development – Public Service
	Funding	CDBG: \$15,000
	Description	<p>Funds will be used by the Chesapeake Arts Center to provide scholarships to subsidize tuition to attend classes and programs for income eligible youth and their families for the Brooklyn Park community.</p> <p>Strategy: Support Initiatives that Improve the Quality of Life for Communities.</p> <p>Objective: Create a Suitable Living Environment.</p> <p>Outcome: Sustainability. CDBG Citation 570.201(e)</p> <p>CDBG National Objective: 570.208.(a)(2)Low/Mod Limited Clientele.</p>
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 low and moderate income youth will participate in classes offered by the Chesapeake Arts Center.
	Location Description	Chesapeake Arts Center – 194 Hammonds Lane, Brooklyn Park, MD 21225.
	Planned Activities	During Local Fiscal Year 2022, funds will be provided to the Chesapeake Arts Center Scholarship Program. The Scholarship Program provides funding for approximately 50 low income youth from the Brooklyn Park community to participate in art, dance, music, drama and other courses.
4	PROJECT NAME	EMERGENCY ASSISTANCE PROGRAM
	Target Area	
	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Prevention
	Funding	CDBG: \$45,000
	Description	<p>Funds will be used by the Community Action Agency to prevent income eligible County residents from being evicted from their homes, as well as assist with first month rent to help families become housed.</p> <p>Strategy: Prevent Homelessness</p> <p>Objective: Affordable Housing</p> <p>Outcome: Availability. CDBG Citation: 570.201(e)</p> <p>CDBG National Objective -570.208(a)(2) – Low/Mod Limited Clientele</p>
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Funds will be used to help 50 income eligible, low and moderate income households remain housed.
	Location Description	Anne Arundel County Community Action Agency, 251 West Street, Annapolis, MD 21401. The assistance will be offered Countywide.
	Planned Activities	Funds will be used to support the Community Action Agency Emergency Assistance Program. This Program will provide emergency financial assistance to 50 households to prevent families from becoming homeless, as well as to assist families with the first month rent.
5	PROJECT NAME	ESG 21 ANNE ARUNDEL
	Target Area	

	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Prevention Homeless – Housing Homeless – Shelter and Services
	Funding	ESG: \$180,964
	Description	ESG Funds will be used to provide emergency shelter, homelessness prevention and rapid re-housing programs. Strategy: Prevent Homelessness, Increase and Sustain Housing Opportunities for the Homeless and Maintain and Enhance Emergency Shelter and Interim Housing Options Objective: Affordable Housing Outcome: Affordability
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 300 individuals, including youth, will be served by Sarah's House Family Shelter Program; 15 households will be provided rapid re-housing services and eight persons will be provided homelessness prevention services by Arundel House of Hope, Inc.; and five households will be provided rapid rehousing services by The Light House.
	Location Description	Emergency Shelter Sarah's House, 2015 20th Street, Fort Meade, MD 20755 Rapid Re-Housing/Homelessness Prevention Program Arundel House of Hope, Inc., 514 N. Crain Highway, Suite K, Glen Burnie, MD 21061 Rapid Re-Housing Program Light House Shelter, 10 Hudson St., Annapolis, MD 21401 Administration: Arundel Community Development Services, Inc., 2666 Riva Road, Suite 210, Annapolis, MD 21401
	Planned Activities	Emergency Shelter ESG funds in the amount of \$85,000 will be used for the continuation of Associated Catholic Charities, Inc. Emergency Shelter Program, known as Sarah's House, which serves homeless families and individuals. Rapid Re-Housing Program ESG funds in the amount of \$57,392 will be used by Arundel House of Hope, Inc. and \$25,000 will be used by Light House Shelter to provide tenant based rental assistance and case management to help homeless persons (especially individuals and families, families with children, veterans and their families) make the transition to permanent housing and independent living. Administration ESG funds in the amount of \$13,572 will be used for general management, planning, oversight, and administration of the ESG Program.
6	PROJECT NAME	FAMILY STABILITY PREVENTION EXTENSION PROGRAM
	Target Area	Neighborhood Revitalization Area – Brooklyn Park Neighborhood Revitalization Area – Glen Burnie Neighborhood Revitalization Area – Severn
	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Prevention
	Funding	CDBG: \$20,000
	Description	Funds will be used to support the Anne Arundel County Partnership for Children, Youth, and Families homeless prevention program for low income families targeting families in the Brooklyn Park Community. Strategy: Prevent Homelessness Objective: Affordable Housing

		Outcome: Availability. CDBG Citation: 570.201(e) CDBG National Objective -570.208(a)(2) – Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Funds will be used to help approximately 10 income eligible, low and moderate income households remain housed.
	Location Description	This Program will target families in the Brooklyn Park Community in northern part of the County.
	Planned Activities	In Local Fiscal Year 2022, Anne Arundel County Partnership for Children, Youth, and Families will use funds to provide a homeless prevention program for approximately 10 low income families.
7	PROJECT NAME	FREETOWN VILLAGE BOYS & GIRLS CLUB
	Target Area	Neighborhood Revitalization Area – Glen Burnie
	Goals Supported	Sustainable Communities
	Needs Addressed	Non-Housing Community Development – Public Service Public Housing – Services
	Funding	CDBG: \$20,000
	Description	Funds will be used to continue the Boys & Girls Club Science, Technology, Engineering, and Math (STEM) Initiatives, as well as the Clubs educational programs at the Freetown Village Public Housing Community. This Program provides after school and summer activities for participating youth. Strategy: Support Initiatives that Improve the Quality of Life for Communities Objective: Create a Suitable Living Environment Outcome: Availability. CDBG Citation: 570.201(e) CDBG National Objective: 570.208(a)(2) – Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 75 youths will be provided academic and recreation programs after school and during the summer at the Freetown Village Boys & Girls Club.
	Location Description	Freetown Village Public Housing Community, 7820 Darrell Henry Ct., Pasadena, MD 21122
	Planned Activities	During Local Fiscal Year 2022, funds will be used to support the Boys & Girls Clubs of Annapolis and Anne Arundel County, Inc. program at the Freetown Village Boys & Girls Club.
8	PROJECT NAME	HOME ADMINISTRATION
	Target Area	
	Goals Supported	Administration of Federal Funds
	Needs Addressed	
	Funding	HOME: \$151,269 County General: \$27,000
	Description	Funds are used for general management, planning, oversight, and coordination of the HOME program activities. CDBG National Objective: 24 CFR570.201(c) – Units
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Arundel Community Development Services, Inc., 2666 Riva Road, Suite 210, Annapolis, MD 21401
	Planned Activities	Funds will be used for general management, planning, oversight, and coordination of the HOME program activities.

9	PROJECT NAME	HOMELESS RESOURCE AND OUTREACH CENTER
	Target Area	
	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Shelter and Services
	Funding	CDBG: \$40,000
	Description	<p>Funds will be provided to Arundel House of Hope, Inc. to fund its Homeless Resource and Outreach Center, which will offer case management, day shelter, information and referral services, housing search, and links to mainstream resources to homeless persons on a drop in basis. The Center will also serve as the Winter Relief Intake Center between November and April.</p> <p>Strategy: Improve the Homelessness Response System</p> <p>Objective: Create a Suitable Living Environment</p> <p>Outcome: Availability. CDBG Citation 570.201(e)</p> <p>CDBG National Objective: 570.208.(a)(2)Low/Mod Limited Clientele</p>
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 540 homeless individuals will be served at the Homeless Resource and Outreach Center.
	Location Description	The Homeless Resource and Outreach Center is located at 514 N. Crain Highway, Suite K, Glen Burnie, MD 21061.
	Planned Activities	Arundel House of Hope, Inc. will operate a resource center for the homeless, which will provide case management, information, referral services, medical, and treatment resources. In addition, the Center will act as the Winter Relief Intake Center from November through April.
10	PROJECT NAME	HOMELESS OUTREACH TEAM
	Target Area	
	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Shelter and Services
	Funding	CDBG: \$25,000
	Description	<p>Funds will be provided to the Anne Arundel County Department of Social Services to fund two full-time outreach workers that will process food stamps and benefit applications and provide services to homeless individuals where they are.</p> <p>Strategy: Improve the Homelessness Response System</p> <p>Objective: Create a Suitable Living Environment</p> <p>Outcome: Availability. CDBG Citation 570.201(e)</p> <p>CDBG National Objective: 570.208.(a)(2)Low/Mod Limited Clientele</p>
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 homeless individuals will be served by the Homeless Outreach Team Program.
	Location Description	Countywide
	Planned Activities	In Local Fiscal Year 2022, funds will be used to support two full-time outreach workers that will process food stamps and benefit applications and provide services to homeless individuals where they are.
11	PROJECT NAME	LANGTON GREEN: HOUSING REHABILITATION
	Target Area	
	Goals Supported	Rental Housing Opportunities
	Needs Addressed	Special Needs – Housing
	Funding	CDBG: \$800,000

	Description	Funds will be used to rehabilitate 24 apartment units for individuals with developmental disabilities. Strategy: Create and Maintain Accessible Rental Housing Units Objective: Provide Decent Affordable Housing Outcome: Availability. CDBG Citation 570.202(a)(1) CDBG National Objective: 570.201(c)
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	24 households with disabilities will be assisted through the Langton Green: Housing Rehabilitation project.
	Location Description	3016 Arundel on the Bay Road, Annapolis, MD 21403.
	Planned Activities	In Local Fiscal Year 2022, funds will be allocated to the Langton Green: Housing Rehabilitation project to rehabilitate 24 apartment units for individuals with developmental disabilities residing at Langton Green's apartment complex in Annapolis. Eligible work to be completed includes rehabilitation of roofing, flooring and windows.
12	PROJECT NAME	MEADE VILLAGE BOYS & GIRLS CLUB
	Target Area	Neighborhood Revitalization Area – Severn
	Goals Supported	Sustainable Communities
	Needs Addressed	Non-Housing Community Development – Public Service Public Housing – Services
	Funding	CDBG: \$65,000
	Description	Funds will be used to continue the Boys & Girls Club Science, Technology, Engineering, and Math (STEM) Initiatives, as well as the Clubs educational programs at the Meade Village Public Housing Community. The Club will also serve youth attending the Van Bokkelen Elementary School and those youth residing in the greater Severn area. This Program provides after school and summer activities for participating youth. Strategy: Support Initiatives that Improve the Quality of Life for Communities Objective: Create a Suitable Living Environment Outcome: Availability. CDBG Citation: 570.201€ CDBG National Objective: 570.208(a)(2) - Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 125 youth will be provided academic and recreation programs after school and during the summer at the Meade Village Boys & Girls Club.
	Location Description	Meade Village Public Housing Community, 1710 Meade Village Circle Rd., Severn, MD 21144
	Planned Activities	During Local Fiscal Year 2022, funds will be used to support the Boys & Girls Clubs of Annapolis and Anne Arundel County, Inc. Program at the Meade Village Boys & Girls Club.
13	PROJECT NAME	MORTGAGE ASSISTANCE PROGRAM
	Goals Supported	Homeownership Opportunities
	Needs Addressed	Affordable Housing – Owner
	Funding	HOME: \$160,000 County-Match: \$40,000
	Description	Funds will be used by Arundel Community Development Services, Inc. (ACDS) to provide deferred repayment loans to income eligible first time homebuyers for mortgage write-down, down payment and closing cost assistance in Anne Arundel County.

		Strategy: Increase Homeownership Opportunities through Programming Objective: Provide Decent Affordable Housing Outcome: Affordability
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 low and moderate income households will be provided with deferred repayment loans for mortgage write-down, down payment and closing cost assistance in the County. Specifically, homebuyers who use the Mortgage Assistance Program (MAP) must have a household income 80 percent and below area median income (AMI). In addition, the applicants must purchase a home in Anne Arundel County, graduate from the ACDS Homeownership Counseling Program, and be a first time homebuyer. Also, a homebuyer must contribute a minimum of one percent of the sales price. The amount of assistance provided is the gap between the cost of the house and what is affordable to the homebuyer. MAP funds are provided in the form of a deferred loan. Loans are provided at zero percent interest with a term of 30 years. The loans will be repaid when the homeowner sells the property, transfers the title, or after 30 years.
	Location Description	The Program will be offered Countywide.
	Planned Activities	During Local Fiscal Year 2022, \$200,000 in HOME and local match dollars will support the MAP in addition to prior year funding. This Program will provide down payment, closing cost, and mortgage write-down assistance to help 12 first time homebuyers, with incomes 80 percent and below area median income, purchase a home. MAP loans will be made available at zero percent interest with the repayment deferred for 30 years, or until the sale or transfer of the home, whichever occurs first. The purchasers are required to complete the ACDS Homeownership Counseling Program as a prerequisite to establish their eligibility to apply for funds available through this Program.
14	PROJECT NAME	OIC JOB TRAINING AND EDUCATION PROGRAM
	Target Area	
	Goals Supported	Economic Opportunities
	Needs Addressed	Economic Opportunities
	Funding	CDBG: \$20,000
	Description	Funds will be used by Opportunity Industrialization Center (OIC) to continue providing evening counseling courses in ESOL, computer training, basic academic skills and GED preparation to low and moderate income unemployed and underemployed County residents. Funds will be used to pay for operational costs such as facility rent, employee salaries and supplies. Strategy: Promote Independence Objective: Create Economic Opportunities Outcome: Availability. CDBG Citation: 570.201(e) CDBG National Objective: 570.208(a)(2) – Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 60 low and moderate income, unemployed or under employed adults will be provided educational and employment assistance.
	Location Description	Opportunity Industrialization Center, 2600 Solomon Island Road, Suite 215, Edgewater, MD 21037
	Planned Activities	In Local Fiscal Year 2022, funds will be allocated to support OIC to provide evening training program to accommodate the schedules of working adults. This Program offers ESOL, basic academic skills, GED preparation, and computer skills training classes to low income residents who are unemployed and underemployed. This Program is expected to benefit approximately 60 low and moderate income persons over the next year.
15	PROJECT NAME	PROPERTY REHABILITATION PROGRAM
	Goals Supported	Homeownership Opportunities

	Needs Addressed	Affordable Housing – Owner
	Funding	CDBG: \$142,281 HOME: \$240,000 County-Match: \$60,000
	Description	Funds will be used to assist low and moderate income homeowners whose homes are in need of property rehabilitation or reconstruction. Funds will be used to provide deferred loans to rehabilitate or reconstruct homes to correct housing, health, occupancy and other code violations. Strategy: Improve the Quality of Existing Affordable Homeownership Units. Objective: Provide Decent Affordable Housing. Outcome: Availability. CDBG Citation 570.202(a)(1) & 570.202 (b)(2) CDBG National Objective: 570.208(a)(3) – Low/Mod Housing.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	To be eligible to participate in the Property Rehabilitation Program, the house must be owner-occupied; the homeowner must have a household income, which is 80 percent and below AMI, current on mortgage payments and taxes, and have sufficient equity to support the loan. The Program provides loans to eligible borrowers at a zero percent interest rate with payment deferred for 30 years. No payments are required on the loan for 30 years, unless the home is sold or the title transfers. It is anticipated that 25 low and moderate income households will be served by the CDBG and HOME funded program in Local Fiscal Year 2022.
	Location Description	The Program will be offered Countywide.
	Planned Activities	The County will continue to offer a comprehensive Property Rehabilitation Program, including the installation of energy efficient measures to reduce utility costs. This Program will include financial counseling and construction oversight to ensure the necessary repairs are completed properly, while providing the homeowners with deferred loans to cover the cost of the repairs. These funds will leverage additional State Special Loan Program dollars to rehabilitate approximately 25 homes throughout the County correcting housing, health, occupancy and other code violations. This Program will be targeted to the Neighborhood Revitalization Communities.
16	PROJECT NAME	REHABILITATION ADVISORY SERVICES
	Goals Supported	Homeownership Opportunities
	Needs Addressed	Affordable Housing – Owner
	Funding	CDBG: \$575,000
	Description	Funds will support staff and implementation cost for the CDBG and HOME funded Property Rehabilitation Program, Property Repair Program, and Accessibility Modifications Program, which includes provisions of technical and financial advisory assistance to income eligible homeowners. Strategy: Improve the Quality of Existing Affordable Homeownership Units Objective: Provide Decent Affordable Housing Outcome: Affordability. CDBG Citation: 570.202(b)(9) CDBG National Objective: 570.208(a)(3) – Low/Mod Housing
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 39 low and moderate income households are anticipated to be served by this Program: five Property Repair Program and 25 CDBG and State funded Property Rehabilitation Program. Participants must qualify for the aforementioned programs to be eligible.
	Location Description	Arundel Community Development Services, Inc., 2666 Riva Road, Suite 210, Annapolis, MD 21401
	Planned Activities	During Local Fiscal Year 2022, CDBG funds will support the implementation cost of the Property Rehabilitation Program, Property Repair Program, Accessibility Modifications Program, and State funded rehabilitation programs. Staff will work

		with homeowners to underwrite project financing and secure State financing, select contractors, develop work write-ups, manage the construction process, and ensure quality work is completed in a timely manner.
17	PROJECT NAME	RENTAL HOUSING PRODUCTION PROGRAM
	Target Area	Communities of Opportunity
	Goals Supported	Rental Housing Opportunities
	Needs Addressed	Affordable Housing – Rental Development
	Funding	HOME: \$980,518 County-Match: \$44,880
	Description	Funds will be used to provide loans to developers for the acquisition, rehabilitation and new construction of rental housing for low and moderate income households. Strategy: Increase the Supply of Affordable Rental Units and Improve and Preserve the Existing Stock of Affordable Rental Housing Objective: Provide Decent Affordable Housing Outcome: Affordability
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Funds may be used to assist with gap financing for several projects who have received an allocation of State LIHTC financing but are in the early stages of development. Therefore, there are no expected outcomes for this year.
	Location Description	
	Planned Activities	HOME and County funds may be used to assist with gap financing for several projects who have received an allocation of State LIHTC financing but are in the early stages of development including (i) the development of North Odenton Apartments, a 150-unit family project, in Odenton; (ii) the development of Eagle Park, a 120-unit senior/family project, located in Hanover; and (iii) the development of Harmons Overlook, a 32-unit family project, in Hanover.
18	PROJECT NAME	REPAIRS WITH CARE PROGRAM
	Target Area	Neighborhood Revitalization Area – Brooklyn Park Neighborhood Revitalization Area – Glen Burnie Neighborhood Revitalization Area – Severn
	Goals Supported	Homeownership Opportunities
	Needs Addressed	Special Needs – Housing
	Funding	CDBG: \$20,000
	Description	Funds will be used by Partners in Care, Inc. to support a program assisting low and moderate income senior homeowners to make accessibility and handyman repairs, and to support programs providing supportive services for the elderly which enable them to remain in their homes or in rental communities allowing them to age in place. Funds will be used to support staff cost. Strategy: Improve Accessibility of Homeownership Units Objective: Provide Decent Affordable Housing Outcome: Availability. CDBG Citation: 570.201(e) CDBG National Objective: 570.208(a)(2) – Low/Mod Limited Clientele – Seniors
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 seniors will be provided with minor accessibility and handyman repairs.
	Location Description	Partners in Care Office, 90B Ritchie Highway, Pasadena, Maryland 21122. Services will be offered to seniors Countywide.
	Planned Activities	In Local Fiscal Year 2022, CDBG funds will be made available to Partners in Care, Inc. to support the Repairs with Care Program. Funds will support a program

		coordinator responsible for providing counseling and technical assistance to enable seniors to access reliable and trustworthy contractors to perform minor home repairs. This Program will enable older adults to remain in their homes or in rental communities. Approximately 100 seniors will be served through this Program during Local Fiscal Year 2022.
19	PROJECT NAME	SCATTERED SITES RENTAL PROGRAM
	Target Area	Neighborhood Revitalization Area – Brooklyn Park Neighborhood Revitalization Area – Glen Burnie Neighborhood Revitalization Area – Severn
	Goals Supported	Rental Housing Opportunities
	Needs Addressed	Affordable Housing – Rental Development
	Funding	CDBG: \$359,490
	Description	Funds will be used to acquire and rehabilitate housing units in the County, targeting housing in the Neighborhood Revitalization Areas, to rent to limited income renters. Strategy: Improve and Preserve the Existing Stock of Affordable Rental Housing Objective: Provide Decent Affordable Housing Outcome: Affordability. CDBG Citation: 570.202(b)(1) and 570.201(a) CDBG National Objective: 570.208(a)(3) – Low/Mod Housing
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Four low and moderate income households will be provided with affordable housing. Rental units available through the Scattered Sites Rental Program are available to a household with an income at 80 percent and below AMI.
	Location Description	The Scattered Site Rental Program will be targeted to the Neighborhood Revitalization Areas.
	Planned Activities	During Local Fiscal Year 2021, \$359,490 in CDBG funds will be utilized through the Scattered Sites Rental Program to continue efforts to revitalize the Neighborhood Revitalization Areas. These funds will be leveraged with State Lead-Based Paint Hazard Reduction Grant, Loan Program funds, and Maryland Community Legacy funds. ACDS, on behalf of Anne Arundel County, will acquire and rehabilitate four homes to be rented to income eligible households.
20	PROJECT NAME	SERVICES FOR SENIORS AGING IN PLACE
	Target Area	
	Goals Supported	Rental Housing Opportunities
	Needs Addressed	Special Needs – Facilities and Services
	Funding	CDBG: \$15,000
	Description	Associated Catholic Charities Division of Housing Services will use \$15,000 in CDBG funds to continue a congregate services program, which provides light housekeeping, meals and other non-medical services so the residents at Friendship Station senior housing complex can age in place. Strategy: Implement support services and programs to help tenants access and retain housing Objective: Provide Decent Affordable Housing Outcome: Availability. CDBG Citation 570.201(e) CDBG National Objective: 570.208(a)(2)Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The Services for Seniors Program will provide congregate services to five very low income seniors residing at Friendship Station.
	Location Description	Friendship Station, 1212 Odenton Road, Odenton, MD 21113

	Planned Activities	During Local Fiscal Year 2022, \$15,000 in CDBG funds has been allocated to continue the Services for Seniors Aging in Place Program at the Friendship Station senior housing community in Odenton. This Program supplements the State funded congregate care program offered at this site. Funds are used to subsidize the cost of providing services, such as daily meals, laundry services, and housekeeping, for approximately five very low income elderly residents. These Programs helps participants age in place and avoid costly nursing homes.
21	PROJECT NAME	THE LIGHT HOUSE FAMILY PROGRAM
	Target Area	
	Goals Supported	Prevent and End Homelessness
	Needs Addressed	Homeless – Shelter and Services
	Funding	CDBG: \$35,000
	Description	Funds will be utilized by The Light House to support the Light House Family Program, including case management, housing search assistance and childcare services for homeless families residing at the shelter. Strategy: Maintain and Enhance Emergency Shelter Options Objective: Create a Suitable Living Environment Outcome: Availability. CDBG Citation 570.201(e) CDBG National Objective: 570.208.(a)(2)Low/Mod Limited Clientele
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Ten families (20-40 individuals) will be served by the Light House Family Program.
	Location Description	The Light House Family Program, 10 Hudson St., Annapolis, MD 21401
	Planned Activities	During Local Fiscal Year 2022, CDBG funds will be utilized to support the Light House Family Program, which will provide case management, housing search assistance, and childcare services for homeless families residing at the Light House shelter.

AP-50 Geographic Distribution

Priority will be given to projects and programs creating new affordable housing units and building the ability for low income households to secure affordable housing in Communities of Opportunity (COOs), especially those in or near current or future transit zones. COOs are areas with a low concentration of low and moderate income households and rank high on indices of quality of life. Generally, these are areas where there is a lack of both affordable rental and affordable homeownership units and a relatively lower number of Non-White and Hispanic residents.

Revitalization efforts and public service dollars (operating funds) will be prioritized to three Neighborhood Revitalization Areas, which are the Brooklyn Park, Glen Burnie, and Severn communities. These areas have their own unique assets and are targeted by the County for place based community development initiatives across a range of disciplines. At the same time, these areas contain a higher concentration of low and moderate income households, older – yet affordable – housing stock in need of updates and repairs, and other needs compared to the County as a whole. These communities have approved Sustainable Community Initiative designations from the State of Maryland and are targeted for revitalization programs.

The Geographic Distribution chart below indicates the percentage of federal funds being invested specifically in the geographic priority areas, but does not include federal funds being made available Countywide, including these geographic priority areas; nor does it include the County general funds being invested in these geographic areas.

Geographic Distribution

Table 9
Geographic Distribution

Target Area	Percentage of Funds
Neighborhood Revitalization Area – Brooklyn Park	6%
Neighborhood Revitalization Area – Glen Burnie	1%
Neighborhood Revitalization Area – Severn	1%
Communities of Opportunity	6%

Rationale for the priorities for allocating investments geographically

During Local Fiscal Year 2022, a portion of the federal public service funds will support place-based initiatives in the Brooklyn Park, Glen Burnie and Severn revitalization communities, including programs for youth, homeless support programs, and eviction prevention.

These areas, which also have a high concentration of low income households may have substandard housing issues. The Property Rehabilitation Program will not be limited to these revitalization communities; however, it will be marketed to homeowners residing in the target areas. Furthermore, a significant portion of federal and local funds will be reserved for acquiring and rehabilitating row homes in the Brooklyn Park and Severn communities, and converted into affordable, quality and well-managed rental housing for income eligible households.

Low and moderate income households lack affordable housing choices throughout the County. During Local Fiscal Year 2022, the County will balance the need for the creation of new affordable units in COO, with stabilizing and improving the existing stock of affordable housing units throughout the County especially in the Neighborhood Revitalization Areas. HOME and County funds may be used to assist with gap financing for several projects who have received an allocation of State LIHTC financing but are in the early stages of development including (i) the development of North Odenton Apartments, a 150-unit family project in Odenton; (ii) the development of Eagle Park, a 120-unit senior/family project located in Hanover; and (iii) the development of Harmans Overlook, a 32-unit family project in Hanover. In addition, a fourth project, Willows at Forest Drive, a 58-unit project located in the City of Annapolis, was awarded State LIHTC financing and is expected to utilize a County payment in lieu of taxes (PILOT) operating subsidy from the County.

Discussion

The County seeks to establish a balanced approach among allocating resources to Neighborhood Revitalization Areas and Countywide affordable housing initiative, strategies to end homelessness, and efforts to uplift economic well-being. The County also seeks to strike a balance between creating new affordable housing opportunities for low income families in high opportunity areas, as well as preserve existing affordable housing, as the need is so great. The Local Fiscal Year 2022 budget accomplishes that goal.

AP-55 Affordable Housing

Table 10 and Table 11 only reflect the number of affordable housing units or housing assistance to be provided with funding from the CDBG, HOME, and ESG programs. The County also offers several other programs, including HOPWA and CoC funded tenant based rental assistance program, which are targeted to the homeless and special needs population. The CoC funded programs will provide tenant based rental assistance to 133 homeless households, and the HOPWA Program will provide tenant based rental assistance to 40 households.

Table 10
One Year Goals for Affordable Housing by Support Requirement

Homeless	25
Non-Homeless	49
Special Needs	<u>25</u>
Total	99

Table 11
One Year Goals for Affordable Housing by Support Type

Rental Assistance	15
The Production of New Units	0
Rehab of Existing Units	60
Acquisition of Existing Units	<u>14</u>
Total	99

Discussion

The County will seek to expand rental assistance to the homeless, special needs population, and very low income population during Local Fiscal Year 2022.

AP-6o Public Housing

Introduction

The Housing Commission owns and/or operates multiple rental communities in the County where the units are made available at affordable rents to low-income families, older adults, and persons with disabilities. Some properties within the Housing Commission portfolio were once public housing units that were converted and redeveloped as privately owned communities. While no longer considered “public housing” units, the redeveloped units continue to be operated by the Housing Commission, and many of these communities contain project-based vouchers. Collectively, the Housing Commission operated communities provide 1,218 units of affordable housing. Of the Housing Commission managed units, 50 percent are open to the general population, including families, elderly households, and persons with disabilities, while 50 percent are restricted to only elderly households or persons with disabilities.

As of March 2021, the Housing Commission had a total of 23,572 unduplicated households on its waiting list for public housing units, privately owned assisted housing managed by the Housing Commission, housing choice vouchers and specialty tenant-based voucher programs. This is a dramatic increase since the Housing Commission first opened their waiting lists in July 2019 after having been closed since 2015 due to average wait times of seven to 10 years.

There are four existing public housing communities, Glen Square, Stoney Hill, Pinewood Village and Pinewood East totaling 671 units. Each of these communities is extremely well maintained, consistently achieving a HUD Public Housing inspection score of 91 or greater. However, the units are aging and are often unable to meet the needs of the population they serve. It is, for this reason, the Housing Commission is utilizing the Rental Assistance Demonstration (RAD) Program to redevelop all of its public housing communities.

Actions planned during the next year to address the needs for housing

Utilizing the Rental Assistance Demonstration (RAD) Program, the agency will eventually convert all of its public housing communities to project-based rental assistance and address long-term maintenance needs by thoroughly redeveloping the properties. Acting as a developer, the Housing Commission has partnered with consultants, architecture and engineering firms, and investors to complete enhancements on the four remaining public housing communities. Glen Square and Stoney Hill are currently in the redevelopment phase and expect to be converted by the end of Local Fiscal Year 2024. There is a plan to add 5 new units to Glen Square. Planning will begin in Local Fiscal Year 2022 on the two remaining public housing properties, Pinewood Village and Pinewood East. To date, the Housing Commission has restructured the ownership of four of its communities through RAD.

Residents of these communities are able to participate in the Housing Commission Family Self Sufficiency Program and the Choices Program funded with federal and County dollars. These programs provide assistance with accessing services such as childcare, transportation, remedial education, job training, treatment, and counseling for substance abuse, and credit counseling, which is secured or provided by the Program Coordinator in an effort to support self-sufficiency and independence. The Housing Commission offers other programs including the Boys & Girls Clubs and Workforce Development programs.

The Housing Commission will continue to focus on improving quality of life for families through exceptional customer service, website updates, staff training, unit improvements, self-sufficiency, and much more. The Housing Commission will continue to establish new partnerships with organizations to help residents create community synergy and improve the sense of neighborhood.

Actions to encourage residents to become more involved in management and participate in homeownership

The Housing Commission will continue to encourage its residents to become involved in the management of their communities during Local Fiscal Year 2022. Resident Councils will continue to operate at each public housing community, providing a monthly forum for residents to express their concerns and needs. In addition, the 14-member Resident Advisory Board will meet quarterly with key staff, providing a conduit for communicating information, sharing ideas, and ensuring resident concerns are clearly identified, analyzed, and evaluated for service. The Housing Commission will also work with the residents of the RAD converted properties to maintain a resident council and stay involved in the management of their communities. In addition, the Housing Commission will continue to have a resident serve on their Board of Commissioners. Residents will be encouraged to provide feedback about their housing and communities through resident surveys and interviews, with feedback being incorporated into the Capital Improvement Plan.

Residents who are interested in homeownership will be encouraged to take part in the Homeownership Voucher Program, which allows residents who are ready for homeownership to use their vouchers toward a mortgage payment. Eligible participants are referred to the Homeownership Counseling Program and federally funded Mortgage Assistance Program administered by ACDS.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

The Housing Commission provides residents a range of opportunities to be involved in developing priorities and to work with management to address issues. Along with its other County partners, the Housing Commission gives residents interested in homeownership opportunities to pursue that goal.

AP-65 Homeless and Other Special Needs Activities

Introduction

There is a collaborative, well-coordinated, and community-based planning process seeking to ensure the needs of individuals who are homeless or at-risk of homelessness within the County are being met. The County provides a continuum of housing and services including prevention, outreach, and supportive services, as well as emergency, transitional, permanent housing, and rapid re-housing. ACDS, with support from the Department of Social Services (DSS), coordinates the Continuum of Care (CoC) planning group, referred to as the Anne Arundel and Annapolis Coalition to End Homelessness (Homeless Coalition). The Homeless Coalition is responsible for developing the competitive CoC application and for developing the plan to end homelessness in Anne Arundel County.

The Homeless Coalition consists of over 50 County and City of Annapolis agencies, concerned citizens, homeless service providers, community-based organizations serving special needs population, as well as others with interests and roles in ending homelessness in the County.

The Homeless Coalition has continually supported the County's successful applications for federal funds and the development of new programs and services to address the needs of the homeless population. For example, the County applied for federal fiscal year 2019 funds from HUD and was awarded \$2,385,199 in competitive CoC funds. In response to COVID-19, HUD did not facilitate a competitive process for federal fiscal year 2020 CoC funds. Instead, all renewal projects were renewed. The CoC allocation for federal fiscal year 2020 for Anne Arundel County will be \$2,459,396. These funds will primarily be used to provide housing for chronically homeless individuals and families.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County, in coordination with the members of the Homeless Coalition, has developed a coordinated entry system helping homeless individuals to more easily access programs and better coordinate housing and services. This year, the goal of the County is to strengthen and

further develop the coordinated entry system. The goal is to improve access to services and to ensure priority for housing is given to the most vulnerable.

The County has a coordinated entry system for both its shelter system and permanent supportive housing programs. Anyone requiring assistance is assessed for shelter using a universal assessment tool. In response to COVID-19, all screening for emergency shelter is being conducted via telephone. These agencies place clients on a single list for the three County shelters, which is managed by a coordinated entry system Gatekeeper at DSS. If clients are at-risk for homelessness, they are referred to homelessness prevention services. The coordinated entry system uses a comprehensive assessment tool that prioritizes homeless households based on the following ratings: housing situation, income, safety, and health. Shelter priority is given to the most at-risk based on the assessment vulnerability score. Assessments are entered into HMIS in real time to ensure timely services. All homeless individuals entering the homeless continuum of care (e.g. outreach, shelter, day programs, etc.) are screened with the VI-SPDAT assessment. Only those individuals with a completed VI-SPDAT and ranking on the ACCESS Housing List can access CoC and HOME funded permanent supportive housing programs. In Local Fiscal Year 2021, the County mobilized local funds and CARES Act funds to support a temporary shelter for its homeless population. The shelter, located at a hotel in Annapolis, is operated by a partnership among ACDS, AHOH, DSS, and Light House. The Hotel Shelter participates in the coordinated entry process.

The continuum of support for the homeless has several outreach teams including the DSS Homeless Outreach Team, the Crisis Response Team and the Assertive Community Treatment (ACT) program. The DSS Homeless Outreach Team works to build relationships with individuals living in homeless camps throughout the County in order to link them to services and housing. In Local Fiscal Year 2021, the Homeless Outreach team was expanded utilizing CARES Act funds to serve a larger population and to provide more intensive services in response to COVID-19. The Homeless Outreach Team expansion will be funded in Local Fiscal Year 2022 with ESG-CV funds.

The ACT Program receives referrals from the police, hospitals, and shelters when a homeless person is in crisis. In addition, AHOH and the Light House provide outreach services, including case management, a day shelter, meals, and links to mainstream resources. The CoC also hosts an annual Homeless Resource Day, which allows service providers to successfully reach out to the homeless and those at-risk of homelessness. The Homeless Resource Day, offering comprehensive services, allows service providers to offer their services in a concentrated manner on one day, as well as to set up appointments for follow-up visits. While the 2021 Homeless Resource Day was cancelled, the Homeless Coalition plans to continue this event in 2022, if and when it is safe to do so.

ACDS submits a consolidated application on behalf of the County and the Homeless Coalition for the Maryland State Homelessness Solutions Program (HSP). However, in response to COVID-19, there was not a competitive application process and grants were level funded for Local Fiscal Year 2021. A total of \$552,000 was awarded to the County, and the County anticipates level funding will be awarded for Local Fiscal Year 2022. These funds will be used to continue to provide housing stabilization and outreach funding to a number of community partners in the County. The services provided include emergency shelter, rapid re-housing, permanent supportive housing case management, homelessness prevention and diversion services, and a homeless outreach day center.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelter

In a typical year, the County has 53 year-round emergency beds for individuals and 99 year-round emergency beds for families. However, due to the Coronavirus pandemic, all of the County shelters are operating at a significantly reduced bed capacity to ensure the health and safety of homeless residents. Emergency shelters can provide temporary housing for up to 90 days, along with three daily meals, case management, life skills, training, housing search assistance and other supportive services.

The rotating church shelter, called the Winter Relief Program, typically has 85 beds, and provides transportation, meals, and temporary housing between the hours of 5:00 p.m. and 7:00 a.m. from November through April. An additional 54 freezing weather beds are provided by local shelters and the City of Annapolis. There is generally a shortage of emergency shelter for both families and individuals in the County, especially during the summer months when the rotating shelter and freezing weather beds are unavailable.

Due to the Coronavirus pandemic the churches are not able to operate the Winter Relief Shelter. However, the County has mobilized local funds, CARES Act funds, and ESG-CV funds to support a temporary shelter for its homeless population. The shelter, located at a hotel in Annapolis, is operated by a partnership between AHOH and DSS. The shelter can serve up to 90 homeless persons and provides three meals a day, case management, housing search assistance, transportation, and other supportive services. This motel based shelter has been funded through end of Local Fiscal Year 2022. Additionally, the County increased the capacity of the outreach teams to serve the homeless population by hiring additional staff to ensure the individuals were linked to services and housing.

In Local Fiscal Year 2022, \$85,000 in Emergency Solutions Grant (ESG) funds, as well as State HSP funds and County funds, will be allocated to Sarah's House, operated by Associated Catholic Charities, Inc. Sarah's House provides emergency shelter to the homeless population in the County, as well as a wide array of supportive services. It is estimated 300 homeless persons, including children, will be assisted by Sarah's House during the next year.

Additionally, ESG-CV funds will be used to address COVID-19 related issues at the County's congregate shelters in order to safely serve the homeless.

Transitional Housing

Arundel House of Hope (AHOH) will continue to provide several transitional housing programs for the homeless in the County including the Fouse Center for 10 homeless men, the Patriot House for six homeless veterans, and four transitional housing units for homeless families. The Fouse Center is funded with \$100,000 in County funds per year.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The County is committed to ending chronic homelessness through outreach and developing housing options for this population. The Homeless Coalition has embraced the Housing First Model as its strategy for ending chronic homelessness. As part of the development of the County coordinated entry system, the Homeless Coalition adopted the VI-SPDAT as its assessment tool and has incorporated it into the HMIS system. The VI-SPDAT is a nationally accepted tool, which evaluates and ranks each homeless individual or family based on a number of risk factors and generates a centralized list of the most vulnerable, chronically homeless individuals and families. Those who are ranked as the most vulnerable and who are chronically homeless are given priority for all of the County HUD-funded permanent supportive housing programs and other services. The centralized list – the ACCESS Housing List – is a coordinated waitlist for all HUD funded permanent housing programs in the County.

The County uses a rapid re-housing strategy for homeless families and provides ESG funded rapid re-housing to over 15 households. The County also utilizes HSP funding to provide rapid re-housing to approximately 10 to 15 families per year. In addition, the County operates a rapid re-housing program targeting unaccompanied homeless youth utilizing State HSP funds.

Prior year HOME and County funds shall be used to provide tenant based rental assistance and intensive case management to help stabilize individuals, families, and veterans who are either homeless or at-risk of homelessness. ESG-CV and Department of Treasury Emergency Rental Assistance funds will also be used for several rapid re-housing programs to help households impacted by the COVID-19 crisis access housing. Additionally, the United Way of Central Maryland has funded a prevention and diversion program, as well as a rapid re-housing program for families in the County. The program is supplemented with Video Lottery Terminal fund and CDBG funds.

The County seeks to end homelessness among veterans. AHOH operates the Patriot House, a Veteran Administration (VA) per diem funded transitional housing program for homeless veterans. AHOH works closely with the Baltimore VA Medical Center (VA) to ensure each veteran receives necessary medical care, services, and access to permanent housing through the HUD Veterans Affairs Supportive Housing (VASH) Program in the County. Many graduates of this program improve their income and are able to afford unsubsidized housing.

Additionally, outreach workers from the VA come to the AHOH Homeless Resource Center on a monthly basis to link homeless veterans to other supportive services. The County has also allocated general funds for the Operation Home Program, which will provide housing location and case management to approximately five homeless veterans and their families.

Staff in the various CoC programs work to reduce recidivism. Approximately 15 percent of individuals and families return to homelessness over a 12-month period. This is due in part to the high cost of housing in the County and the difficulty low income households face in finding units affordable without a subsidy. Those who enter CoC funded permanent housing seldom return to homelessness. The County incorporates the following strategies to reduce returns to homelessness: (a) develop an array of housing resources including permanent supportive housing, rapid re-housing, and other permanent housing and target housing intervention through case conferencing meetings and utilizing by-name lists; (b) provide comprehensive case management and continued after care services once an individual exits the program; (c) build linkage to all mainstream resources; and (d) focus on increasing employment and income by linking individuals to employment services and all benefits, such as SSI, for which they may be eligible.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

One of the key strategies for the County to ending homelessness is to prevent individuals and families from becoming homeless in the first place. A number of County agencies assist households in avoiding homelessness by providing financial assistance to prevent eviction and utility payment assistance to prevent the disconnection of utilities. The County uses CDBG, FEMA, State, and private funds to provide this assistance. Additionally, the United Way has funded a prevention and homeless diversion program. In Local Fiscal Year 2022, \$45,000 in CDBG funds will be allocated the Community Action Agency, and \$20,000 in CDBG funds will be allocated to the Partnership for Children, Youth, and Families to provide eviction prevention, utility turn-off assistance and help with the first month rent. Additionally, the County has made available \$100,000 in flexible funding, allowing the Anne Arundel County Mental Health Agency

to provide short-term emergency housing, eviction prevention, and other needed housing assistance to individuals to maintain and potentially obtain housing. The County will also receive Local Fiscal Year 2022 homelessness prevention funding through the Maryland Homelessness Solutions Program (HSP). In Local Fiscal Year 2021, the County received approximately \$70,000 in homelessness prevention funds, which were administered by the Community Action Agency and The Light House. These funds were used to provide short-term rental and utility assistance, as well as financial assistance to divert individuals away from the shelter system and into sustainable housing.

In response to the COVID-19 crisis, the County provided over \$4.5 million in funding from multiple sources to prevent homelessness in calendar year 2020. Recently, the County received an allocation of approximately \$17 million of Emergency Rental Assistance (ERA) funding and will utilize it to continue to operate a COVID-19 response Eviction Prevention Program (EPP). The program will also utilize State of Maryland ERA and CDBG-CV funds, as well as Entitlement CDBG-CV and County funds. The EPP provides temporary rental and utility assistance for eligible renters whose income has been impacted by the COVID-19 public health crisis. This emergency assistance is to prevent evictions and utility turn-off with the goal of the program being to keep families housed. It is estimated that in Local Fiscal Year 2022, the EPP will serve approximately 500 low to moderate income households.

The County has developed discharge plans and strategies, depending on the population being served, to prevent individuals being discharged from a publicly funded institution – such as foster care, hospitals, mental health programs, and/or jail – from becoming homeless. DSS is responsible for implementing discharge planning for children in foster care. The goal of the County is to make sure every child has a permanent supportive connection before they age out of care. Although there are no publically funded hospitals or health care facilities in the County, the two privately funded hospitals work with DSS to help ensure individuals leaving these facilities are not released to homelessness. Both the Baltimore Washington Medical Center and the Anne Arundel Medical Center employ social workers to link patients to services prior to discharge. The inpatient hospital treatment team completes a needs assessment upon entry into the facility and develops a treatment plan addressing needs such as mental health, housing, substance abuse, job skills, and life skills. The Mental Health Agency also employs aftercare service workers who provide the local link between psychiatric hospitals, residential treatment facilities and community resources to ensure effective discharge planning.

The Health General Article, 10-809 Annotated Code of Maryland, prohibits discharges from State mental health facilities to homelessness. The County makes every effort to prevent individuals exiting the County detention centers from becoming homeless. The detention centers provide case management, including discharge planning, to all individuals sentenced for a time period of greater than seven days in the County's two detention facilities. Detainees are referred to internal GED training, job training, drug treatment, and other life skills courses

in order to prepare for their exit from the detention center. Detainees with mental illness are referred to the State-funded Mental Health Jail Project, which links inmates to services and housing upon discharge from the jail. The Detention Center hosts on-site community service fairs to link in-mates to programs, services and housing options upon release.

Discussion

The County has been successfully applying for competitive CoC funds and has built an inventory of 180 permanent supportive housing units, most of which are targeted to the chronically homeless. During Local Fiscal Year 2022, the County will offer the housing programs to the homeless outlined herein. All of these housing programs outlined herein will provide intensive case management and supportive services.

Anne Arundel County Mental Health Agency SHOP Program Consolidated Grant

\$398,214 in CoC funds will be awarded to provide tenant based rental assistance and supportive services to 22 persons who are chronically homeless and/or homeless and diagnosed with a mental illness.

Catholic Charities Rapid Re-Housing Program

\$151,169 CoC funds will be awarded to Catholic Charities for a program to provide rapid re-housing to at least eight homeless families.

Moving Home Program

The program will continue to provide tenant based rental assistance and support services for homeless individuals, families, and veterans. Additional funds will not be allocated for Local Fiscal Year 2022, as a sufficient balance remains to operate the program.

AHOH Rapid Re-Housing and Prevention Program

\$57,392 in ESG funds will be provided to Arundel House of Hope, Inc. (AHOH) to help 15 homeless households with rapid re-housing and 5 homeless households with prevention services.

The Light House Rapid Re-Housing Program

\$25,000 in ESG funds will be provided to the Light House to help supplement their existing rapid re-housing program for homeless families.

AHOH Community Housing Program

\$134,009 in CoC funds will be awarded to provide permanent supportive housing for 11 chronically homeless women and men.

AHOH Safe Haven Program

\$131,073 in CoC funds will be awarded to provide permanent supportive housing to eight chronically homeless men.

PEP Housing First Program

\$202,708 in CoC funds will be awarded to People Encouraging People, Inc. (PEP) to provide tenant based rental assistance and intensive case management services to 13 chronically homeless individuals.

Shelter Plus Care

\$442,183 in CoC funds will be awarded to the Maryland Mental Hygiene Administration to continue the Shelter Plus Care Program providing tenant based rental assistance and supportive services to 26 homeless households.

Anne Arundel Partnership for Permanent Housing Program

\$930,584 in CoC funds will be awarded to ACDS to administer a permanent housing program. The Program serves individuals who are chronically homeless and provides intensive case management and supportive services to at least 60 households, including families with children.

Finally, Catholic Charities will continue to provide 20 units of affordable permanent housing to homeless families at the Project North Program located at Ft. Meade. The Light House will provide three units of permanent housing to homeless families at the Anchor House location and provide five homeless women with permanent housing at the Willow House Program. These programs will be funded through the federal Project-Based Voucher Program.

The County will also continue to address the housing needs of other special needs populations, such as persons diagnosed with HIV/AIDS, persons with a disability, or older adults. At a minimum, the following actions will be taken in Local Fiscal Year 2022: (i) one unit for the special needs population will be acquired through the CHDO Housing Acquisition/Rehabilitation Program; and (ii) 30 households will be assisted through the Housing Commission's HOPWA funded Rental Assistance Program. Prior year funds are expected to be used to rehabilitate several group homes and to continue the County's accessibility Modification Program.

AP-75 Barriers to Affordable Housing

Introduction

As described in the *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025*, the County has a very strong demand for housing, which ultimately affects pricing. The median price for a

homeownership unit and the average rent continues to increase at a rate higher than household income. Public policy can affect land cost through its local land use controls, especially through the zoning designation. Historically, the coastal location of the County and the significant amount of land located in environmentally sensitive and rural areas has led to strict land use policies. There are over 533 miles of shoreline in the County and approximately 19 percent of its land is designated as critical areas by the State. In addition, the County continues to prioritize environmental stewardship and land preservation, as demonstrated by the fact that 36.5 percent of the total land area in the County is categorized as agricultural, park, recreational and open space land use.

The County can provide opportunity for increased density in its designated growth and transition area, but it is somewhat limited. These land use conditions, in addition to the strong demand for residential units, drives up the cost of land. The delivery of affordable housing is affected by a number of policies, procedures, and regulations instituted at all levels of the development process. The policies, procedures and regulations create site constraints, affecting the number of units the development is able to produce. In addition, there are various fees such as impact fees and water and sewer connection charges that ultimately affect the cost of development. The other constraint often cited by the development community is the County's Adequate Public Facility requirement, especially the requirement for adequate school capacity. While these regulations and fees have reasonable justifications, including environmental protection and ensuring adequate infrastructure such as school capacity, this regulatory framework can have a notable effect on cost and ability to build.

High construction costs are also a barrier to affordable housing. When the housing bubble burst in 2007/2008, a large number of construction workers lost their jobs. Many of them went into other industries and have never returned to the construction field. An even more significant issue is the cost of building materials which represents almost 50 percent of the construction cost. The recent spike and ongoing volatility in material pricing is tied to trade policy disputes involving lumber, steel and aluminum. The dearth of skilled laborers and the high cost of material directly affect the industry's ability to produce affordable units. As these two issues are not affected by local public policy, providing low cost financing is one of the only ways local jurisdictions can have a positive impact on this condition.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

During Local Fiscal Year 2022, the County will carry out the following actions to ameliorate barriers to affordable housing:

- ❖ Continue to implement the County’s new Workforce Housing legislation, which allows increased densities in certain residential zones and residential development in certain commercial and industrial zones for developments that include a specific ratio of affordable homeownership and/or rental units for low and moderate income households. In addition to educating developers, managing the process and monitoring outputs, the County will make available County general and federal HOME funds to leverage some of these developments, especially in Opportunity Areas.
- ❖ Introduce and pass local legislation to create a revenue stream to fund a local Affordable Housing Trust Fund.
- ❖ Develop legislation to create a Moderately Priced Dwelling Unit (MPDU) legislation at the local level.
- ❖ Explore strategies to adjust Adequate Public Facility (APF) requirements and the relationship to affordable housing.

Discussion

The County will continue to pursue policies and funding strategies seeking to resolve and/or mitigate barriers to expand the supply of affordable housing in the County.

AP-85 Other Actions

Introduction

The *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025* demonstrated the need for an array of affordable housing strategies to support for low and moderate income households in the County. The following section describes an array of other actions the County is undertaking to address the needs of low and moderate income residents to secure affordable housing and services to help achieve economic sustainability.

Actions planned to address obstacles to meeting underserved needs

One hundred percent of the federal entitlement funds the County receives are targeted to serving low and moderate income residents through an array of projects outlined in this Plan. Additionally, the County plans to allocate \$3 million in Local Fiscal Year 2022 funds to support and complement the activities, projects and programs funded with federal funds. The County also works diligently to leverage State and federal funds as much as possible with private dollars to meet the needs of the low and moderate income residents.

Actions planned to foster and maintain affordable housing

Specific activities to foster and maintain affordable housing planned for Local Fiscal Year 2022 are highlighted below.

- ❖ The County will provide homeownership, financial literacy, and foreclosure prevention counseling to over 545 households.
- ❖ A total of 35 low and moderate income households will be provided property rehabilitation services, including five very low income households who will be provided with property repair services. Four of the 35 households who receive assistance through property rehabilitation or property repair programs will also be provided with accessibility modification services. Additionally, over 100 elderly households will receive minor home repair and accessibility modifications to allow them to age in place.
- ❖ Approximately 12 first time homebuyers will be assisted with the purchase of their first homes through the provision of down payment, closing cost, and mortgage write-down assistance through the Mortgage Assistance Program.
- ❖ The County will increase the supply of scattered site rental housing by acquiring and rehabilitating approximately two units to be rented to low income households, utilizing a combination of State, County, and CDBG funds. Efforts will be targeted to the Brooklyn Park and Severn communities.
- ❖ HOME and County funds will be committed to assist with gap financing for the development of two new affordable housing developments that were recently awarded State Low Income Housing Tax Credits including (i) HOME and County funds may be used to assist with gap financing for several projects who have received an allocation of State LIHTC financing but are in the early stages of development including (i) the development of North Odenton Apartments, a 150-unit family project in Odenton; (ii) the development of Eagle Park, a 120-unit senior/family project located in Hanover; and (iii) the development of Harmans Overlook, a 32-unit family project in Hanover. In addition, a fourth project, Willows at Forest Drive, a 58-unit project located in the City of Annapolis, was awarded State LIHTC financing and is expected to utilize a County payment in lieu of taxes (PILOT) operating subsidy from the County.
- ❖ The County will provide rental assistance to a minimum of 125 homeless households with CoC funds, 25 homeless families with ESG funds, and a minimum of 30 households with HOPWA funds.
- ❖ The County developed a new Eviction Prevention Program (EPP) in response to the COVID-19 crisis during Fiscal Year 2020. The program will continue through Local Fiscal

Year 2022, and will primarily be funded by Emergency Rental Assistance (ERA) funds, but may also include CDBG-CV and County funds. The Eviction Prevention Program is operated by ACDS, Anne Arundel County Partnership of Children, Youth, and Families, the Community Action Agency, and The Light House in response to the wide-spread loss of employment and income due to the Coronavirus pandemic. Funds will be used to prevent evictions and provide ongoing rental assistance for up to 12 months per eligible renter household. All program participants will qualify as low to moderate income renter households. In Local Fiscal Year 2022, an anticipated a minimum of 500 low and moderate income households will be served through the EPP.

- ❖ The County will provide tenant based rental assistance and mobility counseling to ensure all households receiving housing assistance are able to obtain and maintain housing in a variety of communities throughout the County.
- ❖ HOME CHDO funds will be used to develop one new group home to house individuals with special needs.

Actions planned to reduce lead-based paint hazards.

The federally and State funded Property Rehabilitation Program, Property Repair Program, Accessibility Modification Program, and the Scattered Sites Rental Program are all administered by ACDS in accordance with the Lead-Based Paint Hazard Reduction Act of 1992, or Title X, which took effect in September 2000. Before any construction activities are undertaken, ACDS requires a qualified Risk Assessor to properly test each applicable residence for the existence of Lead-Based Paint (LBP) and prepare a risk assessment report, which dictates the required methods for addressing the LBP hazard.

Residences with peeling or flaking paint are not eligible to be purchased through the federally funded Mortgage Assistance Program unless any noted LBP hazard deficiencies are corrected following proper lead safe work practices and a passed LBP clearance report, as prepared by a certified LBP risk assessor, is provided to ACDS.

LBP in Countywide residential rental properties is addressed through the enforcement of the State of Maryland Reduction of Lead Risk in Housing Law that requires owners of rental properties to register their units with Maryland Department of the Environment (MDE), distribute specific educational materials to prospective tenants and to meet specific LBP hazard reduction standards. In addition, all contractors performing lead paint abatement activities must be certified by the Federal Environment Protection Agency (EPA) and trained by a MDE accredited/licensed training provider and receive accreditation to perform lead paint activities.

Residential housing in the County is also governed by the County's Property Maintenance Code, which requires exterior wood surfaces to be treated or be protected from the elements and decay and all exterior surfaces, including soils, be free of peeling, flaking and blistering paint.

Actions planned to reduce the number of poverty-level families

The County has a significant number of households living in poverty and an even greater number can be classified as low and moderate income. The federal poverty threshold, defined by the U.S. Census Bureau, is adjusted for family size and composition and based on the current cost to provide food for each member of the household. According to these guidelines, the federally defined poverty threshold for a four-person household in 2021 was \$26,500. According to ACS, poverty in this County slightly decreased from 6.1 percent in 2017 to 5.8 percent in 2019. However, in 2019, there were 32,641 residents living at or below the poverty threshold within the County, which is a slight increase from the 2017 total of 32,346 residents.

Poverty impacts all aspects of an individual's life and is caused by a myriad of complex factors. Primarily, it is a function of income, which is related to opportunity, education, job training, and employment. Therefore, the County's primary anti-poverty strategy is to create and foster employment and economic opportunities for low income residents.

The responsibility for implementing strategies to foster employment and economic opportunity is shared and coordinated among various government agencies and service providers. However, the Department of Social Services (DSS) is the primary agency tasked with assisting residents who fall below the poverty line. DSS partners with the Anne Arundel Workforce Development Corporation and the Community Action Agency (CAA) on a number of efforts to assist County residents with moving beyond poverty. In addition, Anne Arundel Community College and the Opportunities Industrialization Center of Anne Arundel County (OIC) provide courses and programs to enhance employment skills. The Anne Arundel County Family Support Center in Annapolis, operated by Maryland Family Network and DSS provides a wide range of programs including (i) education and employment readiness, (ii) adult education and GED prep, (iii) programs for parents, young fathers, and children, and (iv) a teen parent alternative high school program.

DSS also operates a Community Resource Center and a Customer Service Center in Glen Burnie and Annapolis. These centers offer one-stop access to community services at a single location. Not only can residents access the traditional income supports such as Temporary Cash Assistance (TCA) or Food Stamps, they can also access Jobs Work Arundel, an employment program operated by Anne Arundel Workforce Development Corporation. Jobs Work Arundel helps Temporary Assistance for Needy Families (TANF) recipients increase their self-sufficiency through barrier removal, skills and certifications training, essential skills development, and work experience placement that leads to employment. These Centers also provide space for County community partners such as the Anne Arundel County Literacy

Council and Blessed in Tech Ministries, which both provide life skills and job readiness training for individuals who are low income or experiencing homelessness.

The County uses its federal funds for projects and programs providing maximum benefit to extremely low income, low income, and moderate income households. Specifically, in LOCAL FISCAL YEAR 2022 the County will provide \$20,000 in CDBG funds to support OIC of Anne Arundel County. This Program offers English for Speakers of Other Languages (ESOL), basic academic skills, GED preparation, and computer skills training classes to low income unemployed and underemployed County residents. The program is expected to benefit approximately 60 very low and low income individuals over the next year.

While CDBG funds were not allocated to Vehicles for Change in Local Fiscal Year 2022, the Program will continue using remaining funds from the previous fiscal year. This Program prepares donated cars for resale at a low cost to limited income households to enable them to maintain employment and become financially secure and independent. This Program will serve four low income households.

Actions planned to develop institutional structure.

Anne Arundel County is governed by an elected County Executive and County Council. The County Council is the legislative body of Anne Arundel County government and approves all policy and budgetary actions. The County Executive, representing the executive branch of government, appoints the Chief Administrative Officer and other heads of executive agencies in order to implement the policies and budgets as approved by the County Council. The Chief Administrative Officer, on behalf of the County Executive, oversees ACDS, which is responsible for administering housing and community development funds, including CDBG, HOME, ESG, HOPWA and CoC, and related activities in the County. ACDS, which was created by the County in 1993 and is governed by a 13 member Board of Directors, has over 25 years of experience administering federal funds, as well as directly implementing housing and community development activities. In addition to acting as an affordable housing developer and providing direct services, such as homeownership counseling, mortgage assistance, and property rehabilitation, ACDS works closely with partners such as the Housing Commission and the Homelessness Coalition to plan and administer federal funds to support the work of a large network of nonprofit organizations, Community Housing Development Organizations (CHDOs) and affordable housing developers. This network provides housing and services to low and moderate income households and persons who are homeless, have a developmental disability, are mentally ill, are diagnosed with HIV/AIDS or have a substance use disorder.

Actions planned to enhance coordination between public and private housing and social service agencies

The nonprofit organizations and developers whom the County has historically relied upon to provide these critical services are experienced in meeting the needs of the low and moderate income population. The County and ACDS will continue to work with these organizations during Local Fiscal Year 2022 to meet the needs of County residents.

Both ACDS and the Housing Commission will continue to attend monthly Core Group meetings with other County agencies and affiliates, including the Mental Health Agency, Department of Health, Department of Social Services and the Department of Aging and Disabilities. This enables a high level of coordination with the County Executive's staff and the head of each agency around issues that affect public and assisted housing programs and initiatives. As part of regular program development and implementation, ACDS and the Housing Commission will continue to work with various nonprofit agencies, as well as to coordinate wrap around services and case management support. Partners include Supportive Housing Developers, Omni Behavioral Health, The Arc Central Chesapeake Region, People Encouraging People, Anne Arundel County Mental Health Agency, Inc., Vesta Health Services. Staff from the Housing Commission, Bello Machre, ACDS and DSS will also continue to meet quarterly to review case files for clients utilizing CoC or HOPWA vouchers, and staff regularly attends Commission on HIV/AIDS meetings to ensure services are coordinated.

Finally, ACDS will continue to coordinate the Homeless Coalition, which is the Continuum of Care planning group for the County, and the Housing Commission will continue to be an active member. This will provide ample opportunities to coordinate housing services with other member organizations and develop the County's strategy to end homelessness.

Discussion

During Local Fiscal Year 2022, Anne Arundel County will undertake strategic actions to help to address important priorities, including reducing lead-based paint hazards, ending poverty, reducing barriers to affordable housing, and coordination of social services.

AP-go Program Specific Requirements

Introduction

This section describes program specific requirements, as required at 24 CFR91.220(g), for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), the Emergency Solutions Grant (ESG), and HOPWA programs.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1.	The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$600,000
2.	The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
3.	The amount of surplus funds from urban renewal settlements	\$0
4.	The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	\$0
5.	The amount of income from float-funded activities	\$0
Total Program Income		\$600,000

Other CDBG Requirements

1.	The amount of urgent need activities	0%
	The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	100%
2.	The number of years covered by the Annual Action Plan to calculate the minimum amount of CDBG funds to benefit low and moderate income households.	1 year

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

All of the County HOME funds will be used as forms of investment described in Section 92.205(b); no other forms of investment will be provided.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

HOME loan funds are used for direct subsidy to assist homebuyers with down payment and closing costs, as well as mortgage write-down assistance, to enable them to purchase a home. Each homebuyer assisted with HOME funds is required to sign a written agreement detailing the terms and conditions of their HOME loan, prior to receiving the loan. A deed of trust is recorded against the purchased property securing the HOME funds. This lien is non-interest bearing and requires repayment upon sale or transfer, if the property is no longer the income eligible buyer's primary residence, or at the end of 30 years, whichever comes first. Repayment of the loan is required on the entire amount borrowed; however, in

the event of a foreclosure, the amount that must be repaid is limited to the net proceeds from the sale of the home. Net proceeds are defined as the sales price minus superior loan repayment and closing costs paid by the seller. Compliance during the affordability period is achieved through monitoring of all borrowers to confirm the property is still their primary residence. Should a homeowner want to refinance their first mortgage during the term of the HOME loan, the request will be reviewed to ensure that it meets the requirements of the Subordination Policies administered and managed by ACDS.

3. A description of the guidelines for resale or recapture ensuring the affordability of units acquired with HOME funds, as required by 24 CFR 92.254(a)(4), are as follows:

HOME regulations at CFR 92.254 states if HOME funds are used for homebuyer assistance, the County must establish a value limit equal to the HOME affordable homeownership limits provided by HUD for newly constructed housing and for existing housing. The HOME homeownership value limit, effective as of April 1, 2020, for the County is \$303,000 for an existing home and \$371,000 for a newly constructed home. These maximum home values apply to homes purchased with HOME funds and the estimated after rehabilitation value for housing rehabilitated with HOME assistance.

4. Plans for using HOME funds to refinance existing debt secured by multi-family housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The County will not utilize HOME funds to refinance existing debt secured by multi-family housing; therefore, this Action Plan does not include guidelines for refinancing pursuant to 24 CFR 92.206(b).

Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment).

Anne Arundel County will use its Local Fiscal Year 2022 ESG funds to fund an emergency shelter program, two rapid re-housing programs, and a homelessness prevention program. Specifically, \$85,000 in ESG funds will be provided to the Associated Catholic Charities, Inc. (Catholic Charities) Sarah's House Family Shelter Program; \$57,392 will be provided to continue Arundel House of Hope's (AHOH) Rapid Re-Housing and Homelessness Prevention Program; and \$25,000 will be provided to The Light House to supplement their existing Rapid Re-Housing Program. Pursuant to the regulations for Annual Action Plans at 24 CFR 91.220(I), the Anne Arundel County Emergency Solutions Grant Policies describes Anne Arundel County's implementation of the ESG Program.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Anne Arundel County has a coordinated entry system for both its emergency shelter and permanent supportive housing programs. Individuals or families are assessed for shelter using a universal assessment tool at (i) DSS in Glen Burnie and Annapolis; (ii) The Light House in Annapolis; and (iii) AHOH in Glen Burnie. DSS staff also offers after-hour phone assessments. In response to COVID-19, all emergency shelter screening is conducted via telephone. Agencies place clients on a single list for the three County shelters, which is managed by a coordinated entry Gatekeeper. If clients are at-risk for homelessness, they are referred to homelessness prevention services. The screening assessment tool is designed to target individuals and families in need of shelter on the night, which they request shelter, meaning they must be willing and will need to present at the shelter if a bed is available on the same day they request and are assessed for shelter. The coordinated entry Gatekeeper manages the shared waitlist, prioritizing vulnerability based on the assessment, and determines eligibility and placement. Emergency shelters provide a daily count of available beds. If a bed is not available on the same day that a client requests shelter, they will be placed on a wait list but will be expected to present at the shelter on the same day bed space is available and they are contacted. Finally, referrals are provided by the YWCA domestic violence hotline and the Anne Arundel County Mental Health Agency Crisis – Warmline, as appropriate.

Typically, the Winter Relief shelter is operated as a seasonal shelter from November until early April at a variety of local churches. However, due to the Coronavirus pandemic the churches were not able to participate. Hence, the County mobilized local funds, CARES Act, and ESG-CV funds to support a temporary shelter for its homeless population. The shelter, located at a hotel in Annapolis, is operated by a partnership between AHOH and DSS. The Hotel Shelter participates in Coordinated Entry.

Further, all homeless persons entering the CoC system (e.g. outreach, shelter, day programs, etc.) are screened with the VI-SPDAT assessment. Completed VI-SPDAT assessments are submitted to the Homeless Coordinator at DSS where they are processed and scored based on vulnerability and “risk of death” and the individual placed on the Access Housing List. Only those individuals with a completed VI-SPDAT and ranking on the Access Housing List can access CoC and HOME funded permanent supportive housing programs.

All individuals are entered into the County Homeless Management Information System (HMIS). Shelter and program staff utilizing the HMIS system have been trained in the unified application and assessment process.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The process for awarding ESG funds is the same as the process for awarding CDBG, HOPWA, and HOME funds. Proposals are solicited during the fall of each year from the community-at-large for projects for the next fiscal year. At the first of two annual public hearings held by ACDS on behalf of the County, the public is asked to comment on the needs of low and moderate income County residents. At the hearing, staff describes the amount and nature of federal funds expected to be available, solicits proposals for the use of these funds, and explains the criteria for project selection.

Additionally, staff from ACDS facilitates meetings throughout the year with County providers of homeless services where the needs and priorities of the homeless are identified and discussed. These ongoing discussions help to direct the use of ESG funds within the County. Based on local goals and outcomes established in the Consolidated Plan, and as a result of the monthly provider meetings, ACDS staff recommends specific projects for funding to the ACDS Board of Directors at the second public hearing, held in the winter of each year.

Once given approval by the County Executive, these recommendations become part of the County's budget process and awards are made official when the budget is adopted by the County Council by June 15th of each year. Any organization wishing to provide services for homeless persons in the County is encouraged to submit a proposal for consideration.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

As Anne Arundel County is governed by elected officials, it cannot guarantee the participation of "not less than one homeless individual or formally homeless individual" on the County Council, its policy making entity. Therefore, ACDS, on behalf of Anne Arundel County, will implement the procedures described herein to ensure various avenues for consulting with the homeless or ensuring homeless participation where possible.

ACDS is responsible for the staffing and oversight of the Homeless Coalition, which is the Anne Arundel County Continuum of Care entity and an equivalent policy making entity with regards to homeless issues. The Homeless Coalition is an active participant in the planning efforts for the development of its five-year Consolidated Plan and annual Action Plan. The Homeless Coalition has representation from people who are formerly homeless. ACDS will continue to utilize the Homeless Coalition to gain insight, direction, and policy guidance for the planning and implementation of its program for the homeless population.

The Homeless Coalition conducts focus groups with individuals who are homeless at shelters and day centers to determine needs and to provide insight in establishing goals and strategies for planning purposes. This process ensures that homeless individuals are consulted when considering and making policies and decisions regarding ESG funded facilities, services, or other assistance.

5. Describe performance standards for evaluating ESG.

The Homeless Coalition will continue to explore the development of additional performance standards as it further develops its strategic plan to end homelessness. The County will use the following three performance standards to measure the ESG program impact:

- (1) targeting and prioritizing those who are most in need of assistance for housing;
- (2) reducing the number of people living on streets and in emergency shelters; and
- (3) quickly re-housing people who are homeless to reduce the length of time homeless.

When designing the ESG funded rapid re-housing programs and providing ESG funding to Sarah's House Emergency Family Shelter, the County targeted those most in need of assistance. The County HMIS system will be used to monitor the results. As the demand for shelter currently exceeds the available resources, a reduction in those sheltered is not anticipated. However, there will be a focus on increasing turnover of shelter beds with shorter stays, allowing for more people to access shelter instead of remaining unsheltered, and to reduce the length of time people experience homelessness. Emergency shelters will be evaluated on their success in helping guests obtain permanent housing. Rapid re-housing programs will be evaluated on their ability to quickly and permanently re-house people experiencing homelessness.

Discussion

The County will continue to maintain written standards that guide planning, coordination and implementation around ESG funded programs.

HOPWA

Although the County does not receive Housing Opportunities for Persons with AIDS (HOPWA) funds directly from HUD, it operates a HOPWA funded program with funds awarded to the Baltimore Metropolitan Statistical Area. Funds are allocated by Baltimore City to each jurisdiction, including Anne Arundel County, based on the number of individuals living with HIV/AIDS.

ACDS staff meets with service providers for individuals with HIV/AIDS to identify and discuss the needs and priorities of this population. Members of this group include the Housing Commission, the County Department of Health, and nonprofit housing and service providers. These ongoing discussions help to direct the use of HOPWA funds within the County to ensure the needs of this vulnerable population are met.

The County makes the public aware of the availability of these funds through its normal public participation process. At the first of two annual public hearings held each fall by ACDS, on behalf of the County, the public is asked to comment on the needs of low and moderate income County residents with HIV/AIDS. At the hearing, staff describes the amount of HOPWA funds expected to be available, solicit proposals for the use of these funds, and explains the criteria for project selection. Any organization or developer wishing to provide housing and services for persons with HIV/AIDS is encouraged to submit a proposal for consideration. Based on local goals established in the Consolidated Plan and as a result of the quarterly meetings, ACDS staff recommends specific projects for funding to the ACDS Board of Directors at the second public hearing. With the support of the ACDS Board of Directors, these recommendations are submitted to the County Executive. Once given approval by the County Executive, these recommendations become part of the County's budget process and awards are made official when the budget is passed by the County Council each June.

During Local Fiscal Year 2022, \$563,955 in HOPWA funds will be provided to the Housing Commission of Anne Arundel County to operate the Rental Assistance Program. The program provides tenant based rental assistance and supportive services to households affected by HIV/AIDS. It is anticipated that 30 low and moderate income households will receive HOPWA tenant based rental assistance through this program.

APPENDIX I

Application for Federal Assistance SF-424*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:****4. Applicant Identifier:****5a. Federal Entity Identifier:****5b. Federal Award Identifier:****State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:** Anne Arundel County, Md*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

52-6000878

*** c. Organizational DUNS:**

0648759740000

d. Address:*** Street1:**

Arundel Center

Street2:*** City:**

44 Calvert Street

County/Parish:

Anne Arundel County

*** State:**

MD: Maryland

Province:*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

21401-1930

e. Organizational Unit:**Department Name:**

ACDS

Division Name:**f. Name and contact information of person to be contacted on matters involving this application:****Prefix:**

Ms

*** First Name:**

Kathleen

Middle Name:

M

*** Last Name:**

Koch

Suffix:**Title:** Executive Director**Organizational Affiliation:**

Arundel Community Development Services (ACDS)

*** Telephone Number:**

240-222-7606

Fax Number:

410-222-7860

*** Email:**

kkoch@acdsinc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

Community Development Block Grant

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Community Development Block Grant for Federal Year 2021 (July 1-2021-June 30, 2022)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

1

* b. Program/Project

1

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

07/01/2021

* b. End Date:

06/30/2022

18. Estimated Funding (\$):

* a. Federal

2,145,963.00

* b. Applicant

* c. State

* d. Local

* e. Other

600,000.00

* f. Program Income

2,745,963.00

* g. TOTAL

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Mr.

* First Name:

Matthew

Middle Name:

J.

* Last Name:

Power

Suffix:

* Title:

Chief Administrative Officer

* Telephone Number:

410-222-1074

Fax Number:

410-222-1131

* Email:

expowe44@aacounty.org

* Signature of Authorized Representative:

* Date Signed:

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <div data-bbox="899 1339 1511 1377">Chief Administrative Officer</div>
APPLICANT ORGANIZATION <div data-bbox="95 1486 870 1514">Anne Arundel County, Maryland</div>	DATE SUBMITTED 

Application for Federal Assistance SF-424*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:****4. Applicant Identifier:****5a. Federal Entity Identifier:****5b. Federal Award Identifier:****State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:** Anne Arundel County, Md*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

52-6000878

*** c. Organizational DUNS:**

0648759740000

d. Address:*** Street1:**

Arundel Center

Street2:*** City:**

44 Calvert Street

County/Parish:

Anne Arundel County

*** State:**

MD: Maryland

Province:*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

21401-1930

e. Organizational Unit:**Department Name:**

ACDS

Division Name:**f. Name and contact information of person to be contacted on matters involving this application:****Prefix:**

Ms

*** First Name:**

Kathleen

Middle Name:

M

*** Last Name:**

Koch

Suffix:**Title:** Executive Director**Organizational Affiliation:**

Arundel Community Development Services (ACDS)

*** Telephone Number:**

240-222-7606

Fax Number:

410-222-7860

*** Email:**

kkoch@acdsinc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grant

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Emergency Solutions Grant for Federal Year 2021 (July 1-2021-June 30, 2022)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):*** a. Federal * b. Applicant * c. State * d. Local * e. Other * f. Program Income

* g. TOTAL

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <div data-bbox="899 1339 1511 1377">Chief Administrative Officer</div>
APPLICANT ORGANIZATION <div data-bbox="95 1482 870 1514">Anne Arundel County, Maryland</div>	DATE SUBMITTED 

APPENDIX II

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing

The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-Displacement and Relocation Plan

It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying

To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction

The Consolidated Plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan

The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3

It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

Matthew J. Power

Name

Chief Administrative Officer

Title

SPECIFIC CDBG CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation Plan

It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan

Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan

It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds

It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) _2020_ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed 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.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force

It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent 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 which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance with Anti-Discrimination Laws

The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint

The County's activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R.

Compliance with Laws

The County will comply with applicable laws.

Signature/Authorized Official

Date

Matthew J. Power

Name

Chief Administrative Officer

Title

SPECIFIC HOME CERTIFICATIONS

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance

The use of HOME funds for tenant-based rental assistance is an essential element of the Anne Arundel County's Consolidated Plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Cost

The County is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance

Before committing any funds to a project, the County will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

Date

Matthew J. Power

Name

Chief Administrative Officer

Title

ESG CERTIFICATIONS

The Emergency Solutions Grants Program Recipient certifies that:

Major Rehabilitation/Conversion

If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs

In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation

Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive services

The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching funds

The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality

The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement

To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan

All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy

The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

Date

Matthew J. Power

Name

Chief Administrative Officer

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Signature/Authorized Official

Date

Matthew J. Power

Name

Chief Administrative Officer

Title

APPENDIX III

AMENDMENTS TO PREVIOUS ACTION PLANS

CDBG Program

Budget Amendment	FFY/ LFY	Original Budget	Committed/ Expended	Balance	Budget Amendment	Remaining Balance
Chesapeake Arts Scholarship Program	19/20	\$15,000	\$14,996.75	\$3.25	(\$3.25)	\$0.00
Total					(\$3.25)*	

* Funds in the amount of \$3.25 reallocated to the FFY21/LFY22 Property Rehabilitation Program

APPENDIX IV

Process for Soliciting Project and Programs for HOME Funding

Pursuant to the regulations for Annual Action Plans at 24 CFR 91.220(I(2)), the following describes Anne Arundel County's procedures for soliciting and funding applications or proposals for projects and programs to be funded through the HOME Investment Partnerships Program.

Process for Soliciting Project and Programs for HOME Funding

The process for awarding HOME funds is the same as the process for awarding CDBG, HOPWA, and ESG funds. Proposals are solicited during the fall of each year from the community at large for projects for the next fiscal year. At the first of two annual public hearings held by ACDS on behalf of the County, the public is asked to comment on the needs of low and moderate income County residents. At the hearing, staff describes the amount and nature of federal funds expected to be available, solicits proposals for the use of these funds, and explains the criteria for project selection.

Specific programs funded with HOME funds include the Mortgage Assistance Program (MAP), Property Rehabilitation Program, the Rental Production Program (RPP) and the Community Housing Development Organizations (CHDO) Program. These programs are marketed to the public through public hearings, the ACDS website, special outreach events, Homeownership Counseling classes conducted by ACDS staff, and through ACDS' participation in County and State affordable housing coalitions in which ACDS staff builds relationships with developers and other industry professionals.

Each program has a separate application process. The public can find applications online for programs such as MAP at www.acdsinc.org or by contacting the ACDS office. Additionally, developers wishing to obtain HOME funding from either the RPP or CHDO Program should schedule a meeting with ACDS staff to discuss their proposed project and available funding. RPP and CHDO projects chosen for HOME funding are typically a first-come-first-serve basis as long as they meet the County's development goals and the project is an eligible activity for HOME funding. New construction multifamily rental projects which are located in Opportunity Areas, as defined in Anne Arundel County's Consolidated Plan: 2016-2020, are given priority for HOME funds, while redevelopment projects located in Priority Revitalization Communities are also given priority.

To be eligible for these programs, applicants must meet certain requirements. For the MAP program, applicants must first graduate from the Homeownership Counseling Program, have an income level under 80 percent of the area median income, have a total debt to income ratio under 45 percent, and cannot displace any tenants currently living in the home for which MAP funds are being requested. For the CHDO program, developers must first be certified as a CHDO

before obtaining HOME funding. The developer must meet certain criteria such as being a non-profit organization that operates independently from other entities and has experience developing group housing. Developers requesting HOME funding from the RPP program must also show experience developing multifamily affordable housing projects. Additionally, developers must show its fiscal capacity to develop the project with the commitment of other funding sources, as well as the ability to financially support the operation of the project during the affordability period.

APPENDIX V

Anne Arundel County, Maryland Emergency Solutions Grant Operations Manual



Prepared by: Arundel Community Development Services, Inc.

Updated: February 2020

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Appendices and Resources

Appendix A: Homeless Definition and Recordkeeping

Appendix B: Documentation Checklist: Homelessness Verification

Appendix C: File Requirements

Appendix D: Protect Your Family from Lead in Your Home Booklet

Appendix E: Income Calculation Form

Appendix F: Minimum Standards for Permanent Housing

Additional resources on the Emergency Solutions Grant:

<https://www.hudexchange.info/programs/esg/>

<https://www.hudexchange.info/esg/faqs/>

EMERGENCY SOLUTIONS GRANT (ESG) OPERATIONS MANUAL

I. Overview

On May 20, 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 was passed into law, which amended and reauthorized the McKinney-Vento Homeless Assistance Act. The Emergency Solutions Grant (ESG) program is one of the primary McKinney-Vento Act programs affected by the HEARTH Act. HUD released interim regulations for ESG in December 2011. The final regulations have not been finalized, so HUD has instructed to utilize these regulations until the final is complete. Some of the primary changes include a change of name to Emergency Solutions Grant (formerly Emergency Shelter Grant), expansion of the definition of homelessness and chronic homelessness, a substantial increase and emphasis on prevention/rapid re-housing resources and greater focus on program performance.

The ESG Program is a categorical grant allocated according to population and other demographic factors to eligible jurisdictions nationwide. Arundel Community Development Services, Inc. (ACDS) is under contract with Anne Arundel County, the designated recipient for ESG funds, for the administration of these funds.

The ESG program provides funding to:

1. Engage homeless individuals and families living on the street;
2. Improve the number and quality of emergency shelters for homeless individuals and families;
3. Help operate these shelters;
4. Provide essential services to shelter residents;
5. Rapidly re-house homeless individuals and families; and
6. Prevent families and individuals from becoming homeless.

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities).

When establishing the local Emergency Solutions Grant Program, Anne Arundel County made a number of decisions to best meet its specific needs. The grey boxes below outline the local policies adopted by the County in its implementation of the ESG Program.

Anne Arundel County Approved ESG Activities

At this time, based on community feedback and consultation, Anne Arundel County has prioritized its limited ESG funding for the following eligible activities: 1) emergency shelter; 2) rapid re-housing; and 3) homelessness prevention. Other eligible ESG activities may be approved in future years. Funding available for street outreach and emergency shelter expenditures is capped. Combined street outreach and emergency shelter is capped at no more than \$85,000 per year.

II. General Requirements

The following information and standards are applicable to all ESG-funded projects.

Housing First

Housing First is a proven method of ending all types of homelessness and is the most effective approach to ending chronic homelessness. The Housing First approach quickly connects people experiencing a housing crisis to permanent housing without preconditions with limited service participation requirements and with the supports needed to maintain housing. Evidence from communities and programs that follow a Housing First approach shows that Housing First can reduce the length of time people are homeless, increase consumer choice, and increase housing stability.

Housing First is an alternative to approaches where people experiencing homelessness must demonstrate their readiness for permanent housing or otherwise participate in a linear set of time-limited housing and services before obtaining permanent housing. By contrast, Housing First suggests that: everyone is “housing ready,” that people experiencing a wide variety of barriers can successfully find and maintain housing with the right supports; and that people are better able to address their goals and challenges when stably housed.

Subrecipients should evaluate and eliminate eligibility requirements that prevent higher need families and individuals from accessing their programs, especially requirements related to employment, minimum income, rental history, or substance use history. Providers without experience serving higher need families and individuals should increase their programmatic capacity either internally through trainings or through strategic partnerships. Providers should strive to offer the least amount of services necessary to quickly obtain permanent housing quickly and maintain it, thus promoting self-sufficiency.

Coordinated Entry & Assessment Process

The Anne Arundel Continuum of Care (CoC) has a Coordinated Entry (CE) system for both its emergency shelter and permanent supportive housing programs. The CE system covers the entire County. Anyone can be assessed for shelter using a universal assessment tool at (i) the County Department of Social Services (DSS) in Glen Burnie or Annapolis; (ii) Light House in

Annapolis; and (iii) Arundel House of Hope in Glen Burnie. DSS staff offers after-hour phone assessments. Agencies place clients on a single list for the three County shelters, which is managed by a CE Gatekeeper. If clients are at-risk for homelessness, they are referred to homelessness prevention services. The screening assessment tool is designed to target individuals and families in need of shelter on the night which they request shelter, meaning they must be willing and will need to present at the shelter if a bed is available on the same day they request and are assessed for shelter. The Gatekeeper manages the shared waitlist, prioritizing vulnerability based on the assessment, and determines eligibility and placement. Emergency shelters provide a daily count of available beds. If a bed is not available on the same day that a client requests shelter, they will be placed on a wait list but will be expected to present at the shelter on the same day bed space is available and they are contacted. Finally, referrals are provided by the YWCA domestic violence hotline and the Anne Arundel County Mental Health Agency Crisis – Warmline as appropriate.

Further, all homeless persons entering the County's homeless continuum of care (e.g. outreach, shelter, day programs, etc.) are screened with the VI-SPDAT assessment. Completed VI-SPDAT assessments are submitted for to the Homeless Coordinator at the Department of Social Services where they are processed and scored based on vulnerability and "risk of death" and the individual placed on the Access Housing List. Only those individuals with a completed VI-SPDAT and ranking on the Access Housing List can access CoC and HOME funded permanent supportive housing programs.

All individuals are entered into the County's Homeless Management Information System (HMIS). Shelter and program staff utilizing the HMIS system has been trained in the unified application and assessment process.

HMIS Participation

Subrecipients are required to collect and enter data into Service Point, a community-wide HMIS system. Data must include all persons served and all ESG-funded activities. Training and information about accessing and entering data into Anne Arundel County's HMIS system should contact: Justin Bieler, Homeless Coordinator and HMIS Administrator, Anne Arundel County Department of Social Services, 410-269-4498.

Emergency Shelter

III. Emergency Shelter Policies and Procedures

Purpose of ESG funds: (1) improve the number and quality of emergency shelters for homeless individuals and families; (2) help operate these shelters; and (3) provide essential services to shelter residents. Eligible costs for emergency shelter include providing essential services to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters. Staff costs related emergency shelter eligible related to carrying out activities are also eligible.

A. Participant Eligibility Criteria

Individuals and families defined as homeless under the following categories are eligible for assistance in Emergency Shelter projects:

- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homelessness
- Category 3 – Homeless Under Other Federal Statutes
- Category 4 – Fleeing/Attempting to Flee DV

Category 1 – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Documentation requirements may include a signed and dated general certification from an outreach worker verifying that the services are going to homeless persons, and indicates where the persons served reside. Staff should provide written information obtained from third party regarding the participant's whereabouts, and, then sign and date the statement. Staff may use a written referral from the agency, written verification from the institution's staff that the participant has been residing in the institution for less than 90 days; and information on the

previous living situation as being homeless in shelter or streets. Written verification should be used if available. Self-report is acceptable only as a last resort.

Category 2 – Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Documentation Requirements include:

- A court order resulting from an eviction action notifying individual or family that they must leave; or
- For individuals and families leaving a hotel or motel- evidence they lack the financial resources to stay; or a documented and verified oral statement; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing.

Category 3 – Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers. See Appendix A for Homeless Definition and Record Keeping.

Category 4 – Fleeing/Attempting to Flee DV

Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing.

Acceptable Evidence for Individuals Fleeing Domestic Violence:

- Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household and where the safety of the household is not in jeopardy;

- Written observation by intake worker; or
- Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.
- If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

B. Record Keeping Guidance – Emergency Shelters

The recordkeeping requirements found in 24 CFR §576.500 require recipients to maintain and follow written intake procedures to determine whether potential program participants meet the homeless definition found in 24 CFR §576.2. These procedures must require documentation at intake of the evidence used to establish and verify homeless status.

Therefore, recipients and subrecipients are required to document eligibility at program entry, even for emergency shelters. However, HUD recognizes that third-party documentation at the emergency shelter level is not feasible in most cases. For shelters where program participants may stay only one night and must leave in the morning, documentation must be obtained each night. If program participants may stay more than one night, then documentation must be obtained on the first night the household stays in the shelter.

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. ***Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.***

Note that this is a different standard for recordkeeping than is required for all other types of assistance. For all other types of assistance funded under the ESG Program, the interim rule establishes the following order of priority for obtaining evidence:

1. Third-party documentation, including written and source documentation, and HMIS records;
2. Intake worker observations;
3. Certification from persons seeking assistance.

Note: Emergency shelter providers do need to enter each individual or family seeking emergency shelter into HMIS. However, the intake process should be able to be done fairly quickly. HUD does not require the same level of intake assessment at entry to an emergency

shelter – especially a “nightly turnout” shelter – as for a Rapid Re-housing or Homelessness Prevention program. HUD only requires the uniform data elements at entry. If emergency shelters want to complete a vulnerability index or similar assessment to help understand and address each individual or family’s needs, this does not need to be done at intake and could be conducted at a later time.

C. Eligible Activities & Costs – Emergency Shelter

Essential Services

The use of ESG funds for costs of providing essential services to homeless families and individuals in emergency shelters; renovating a building to be used as emergency shelter for homeless families and individuals; and operating emergency shelters. Those meeting the definition of homeless in Categories 1, 2, 3, and 4 are eligible for emergency shelter services. Essential services include:

- Case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment, transportation, and services for special populations, (homeless youth, victim services, and services for people living with HIV/AIDS (so long as the costs of providing these services are eligible as previously listed). Staff costs related to carrying out emergency shelter activities are also eligible.

Case Management is the act of assessing, arranging, coordinating, and monitoring individualized services developed for program participants. Case Management Eligible Costs include:

- Using centralized or coordinated assessment systems;
- Conducting initial evaluations including, verifying and documenting eligibility;
- Counseling;
- Developing, securing and coordinating services and obtaining federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Child Care Costs are for children under the age of 13, or disabled children under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates. Child Care Eligible Costs include:

- Childcare costs

- Providing meals and snacks
- Comprehensive and coordinated sets of appropriate developmental activities

Education eligible services include instruction or training in to enhance participants' ability to obtain and maintain housing, consumer education, health education, substance abuse prevention, literacy, ESL and GED. Education includes Life Skills training which are critical life management skills necessary to assist the program participant to function independently in the community and eligible costs would include budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting. Education Eligible Costs include:

- Screening, assessment, and testing
- Individual/group instruction
- Tutoring
- Books, supplies, and instructional materials
- Counseling
- Referral to community resources

Employment assistance and job training include services assisting participants to secure employment and job training programs. Employment Assistance and Job Training Eligible Costs include:

- Classroom, online, and/or computer instruction
- On the job instruction
- Job finding and skill building
- Reasonable stipends to program participants in employment assistance and job training programs
- Books and instruction materials
- Employment screening, assessment or testing
- Structured job seeking support
- Special training and tutoring, including literacy training and prevocational training
- Counseling or job coaching
- Referral to community resources

Outpatient Health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Outpatient health services eligible costs include:

- Assessing health problems and developing treatment plans
- Assistance in understanding health needs
- Providing directly or assisting to obtain appropriate medical treatment; preventive medical care, health maintenance services, including emergency medical services
- Providing medication and follow-up services

- Providing preventive and non-cosmetic dental care

Legal Services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. This would include necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing. Legal issues would include child support; guardianship, paternity, emancipation, legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants. Legal services for immigration and citizenship matters and issues relating to mortgages, retainer fee arrangements, and contingency fee arrangement are ineligible costs. Legal services eligible costs include:

- Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling;
- Filing fees and other necessary court costs.

Mental Health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Services are direct outpatient treatment of mental health conditions by licensed professionals. Mental Health services eligible costs include:

- Crisis intervention
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications and explanation about the use and management of medications
- Combinations of therapeutic approaches to address multiple problems

Substance Abuse Treatment is an eligible activity to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors, must provide services. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible costs. Substance Abuse Treatment eligible costs include:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling
- Drug testing

Transportation costs of travel by program participants to and from medical care, employment, childcare or other facilities that provide eligible essential services. Staff costs to travel to support provision of essential services are also eligible. Transportation eligible costs include:

- Public transportation for participants
- Mileage allowance for service workers using their own vehicles to visit program participants
- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for purchased or leased vehicles

Services for Special Populations means otherwise eligible essential services that are tailored to address the special needs of homeless youth, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organization with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking, and/or people living with HIV/AIDS in emergency shelters. Services for Special Populations eligible costs include:

- Case management
- Childcare
- Education services
- Employment assistance and job training
- Outpatient Health services
- Legal services
- Life Skills training
- Mental health services
- Substance abuse treatment services
- Transportation

Shelter Operation Costs

Shelter Operation involves costs to operate and maintain emergency shelters and also provide other emergency lodging when appropriate. Where no emergency shelter is available, eligible costs may also include a hotel or motel vouchers.

NOTE: If a shelter serves families (and receives operating funds), the shelter cannot deny services to families based on family composition (e.g., 1-parent, 2-parent, same-sex parent, unmarried, married, etc.). Family shelters cannot separate families, except in instances of physical space constraints.

Shelter operation eligible costs include:

- Minor or routine maintenance
- Rent
- Security
- Fuel

- Equipment
- Insurance
- Utilities
- Food
- Furnishings
- Supplies necessary for the operation of the emergency shelters
- Hotel/Motel voucher only for families and individuals where no emergency shelter is available

In general, maintenance activities include: cleaning; minor or routine repairs of furnishings, equipment, and fixtures; and protective or preventative measures to keep a building, its systems, and its grounds in working order. Maintenance activities:

- Do not materially add to the value of the building/property;
- Do not appreciably prolong the useful life of the building/property; and
- Do not adapt the building/property to new uses.

Examples of maintenance activities could include activities such as: replacing a few shingles on a leaky roof; patching leaking pipes or plumbing; replacing a broken window; fixing a crack in a sidewalk; filling potholes in a parking lot; and repairing portions of a fence.

The minimum period of use for maintenance activities is the same as for other shelter operations and essential services activities—that is, the recipient/subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided (for example, the contract period specified in a subrecipient agreement) (see § 576.102(c)(2)).

IV. Anne Arundel County Specific Policies – Emergency Shelter

Anne Arundel County has established specific policies for the operation of its emergency shelter program as outlined in the County’s Consolidated Plan and annually in the County’s Annual Action Plans. Currently, the County awards funds to Catholic Charities for the operation of Sarah’s House Emergency Shelter, which serves as the County shelter. The following description outlines the County’s specific emergency shelter policies as it pertains to the operation of ESG-funded shelters in the County.

Eligibility Determination - The Anne Arundel County Department of Social Services (DSS) is the coordinated entry point for the County’s emergency shelter system. Homeless persons are referred to Coordinated Entry by: the Light House, Arundel House of Hope, and the DSS Resource Centers. The responsibility for evaluating a participant’s initial eligibility for Anne

Arundel County's ESG funded emergency shelters is the Anne Arundel County Department of Social Services (DSS) Emergency Shelter Gatekeeper. Initial eligibility determination is conducted over the phone; therefore, emergency shelters are responsible for verifying eligibility and maintaining adequate documentation when clients arrive. At minimum, all shelter guests must document that they meet HUD's Homeless definition as stated in 24 CFR § 576.2. DSS screens applicants to ensure they have no other housing resource – such as friends or family they can stay with – prior to accepting them into the shelter system.

Policies and Procedures for Admission, Diversion, Referral, and Discharge from ESG-funded Emergency Shelters

Admissions: At a minimum, all shelter guests must document that they meet HUD's Homeless definition as stated in 24 CFR § 576.2. Shelter guests are initially offered up to 90 days of shelter, with the opportunity to return if space is available once they have stayed 90 days. As Sarah's House Shelter is located at Ft. Meade Army Base, participants are also screened to ensure they meet Defense Department criteria.

Diversion: All guests will be screened prior to referral to a shelter. During the initial screening, the DSS Gatekeeper will assess an individual or family resources and situation to determine if other housing options are available. Shelter is only offered when no other housing options are obtainable. The County is working to develop a stronger diversion assessment and referral process.

Referral: Homeless persons are referred to the coordinated entry employee, the Gatekeeper, by: shelter and outreach staff, and the DSS Resource Centers. Coordinated entry assessments for emergency shelter are completed at the following locations:

The Light House

(410) 263-1835 | 10 Hudson St., Annapolis

The Safe Harbor Resource Center is open for in-person screening on M, T, Th, F 9:00am-3:00pm and W 12:00-7:00pm.

Arundel House of Hope

514 N Crain Hwy., Glen Burnie

Screening is done in-person at the Day Center - Monday through Friday between 10:00am and 2:00pm. Day Center is also open for a variety of other services.

Anne Arundel County Department of Social Services

7500 Ritchie Hwy, Glen Burnie or 80 West St., Annapolis

Screening is done in-person Monday through Friday between 8:30am and 4:00pm. Arrive at the agency and ask to speak with Emergency Services for shelter.

Individuals in crisis can contact the following community resources:**Crisis Response Warm Line**

(410) 768-5522

Domestic Violence Hotline

410-222-6800

Discharge: Shelters may terminate assistance if an individual or family violates shelter rules or program requirements in accordance with a formal written process that recognizes the rights of the individuals affected. Generally, program rules are reviewed with each guest upon entry into the program. Violation of rules may result in an involuntary exit from the program. Generally, the guest is informed of being dismissed from the shelter and will be transported to the DSS offices the next working day. An immediate dismissal is only enforced if the guest's behavior is deemed to be a threat to the safety of the facility and/or other guests and staff. If a guest leaves belongings at the shelter, there is a 48-hour grace period before the belongings are discarded.

Safeguards to Meet the Safety and Shelter Needs of Special Populations

Sarah's House, an ESG-funded shelter, has a handicapped accessible room and bathroom to serve those individuals with disabilities. Sarah's House also offers mental health and substance abuse assessments by licensed professionals. The program has 24-hour security and program staff available to meet the needs of shelter guests. Case Management and support services are available to all guests including those with the highest barriers to housing. Those individuals may apply for transitional housing which provides supported housing for a period of 24 months allowing guests to address housing barriers.

Policies and Procedures for Assessing, Prioritizing, and Reassessing Individuals and Families

Anne Arundel County's Coordinated Entry prioritizes families or individuals who meet HUD's Category 1 definition of homeless – staying in a place not fit for human habitation. Status is determined during initial assessment by referring agency and verified by the Coordinated Entry Gatekeeper. When beds are available, this population receives top priority.

Upon entry into the ESG-funded emergency shelter, all guests meet with a case manager to develop a housing plan. Within the first 48 business hours of arrival, they complete an intake packet, including a comprehensive needs assessment that identifies barriers to permanent housing. The case manager also creates a case plan outlining goals that includes action steps and completion dates for goals. Essential services offered include, but are not limited to, housing search, employment barriers, job training, education, transportation, child care, health, mental health, substance abuse, and legal services. The program prioritizes the services which help guests obtain permanent housing, increase income, and save money.

V. Other Shelter Requirements

Prohibition against involuntary family separation: The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

The Equal Access Rule Definition of family: *Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,
2. A group of persons residing together, and such group includes, but is not limited to:
 - a. A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - b. An elderly family;
 - c. A near-elderly family;
 - d. A disabled family;
 - e. A displaced family; and,
 - f. The remaining member of a tenant family.

In general, this definition of “family” applies to both the ESG and CoC Program rules. However, the McKinney-Vento Act, as amended by the HEARTH Act, distinguishes individuals from families. Therefore, paragraph (1) of the definition of family under the Equal Access Rule is considered an individual under the CoC and ESG programs and the definition of family for these programs is defined as follows:

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

Eligibility for assistance under the ESG Program when the individual members of the family are residing in different places upon presentation to the project: Under HUD's Homeless Assistance Programs, persons presenting together for assistance regardless of marital status, actual or perceived sexual orientation, or gender identity are considered a family and can be served as a family in the ESG and CoC programs.

In general, when determining the homeless status of families where the individual members are not residing together when they present for intake into the project (e.g. one parent is staying in an emergency shelter and the other parent is staying with a child at a friend's house), eligibility must be assessed using:

1. The adult head of household (in cases where more than one adult is present in the family, HUD allows the family to choose which adult will be the head of household, for application purposes); or
2. The minor head of household when no adult is present.

Rapid Re-Housing

The purpose of Rapid Re-Housing is to help homeless persons living on the streets or in an emergency shelter transition as quickly as possible into permanent housing, and then to help such persons achieve stability in that housing.

Eligible costs include housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help individuals or families living in an emergency shelter or other place move as quickly as possible into permanent housing and achieve stability in that housing.

Component services and assistance generally consist of short-term and medium-term rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair.

Anne Arundel County works with subrecipients to establish specific criteria for the operation of its Rapid Re-Housing Program as outlined annually in the County's Annual Action Plans.

VI. Rapid Re-Housing Policies and Procedures

A. Participant Eligibility Criteria

Appendices include tables of eligibilities both by definition of homelessness category and program activity category. Individuals and families defined as homeless under the following categories are eligible for assistance in rapid re-housing projects:

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV

Category 1 – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Documentation requirements may include a signed and dated general certification from an outreach worker verifying that the services are going to homeless persons, and indicates where the persons served reside. Staff should provide written information obtained from third party regarding the participant's whereabouts, and, then sign and date the statement. Staff may use a written referral from the agency, written verification from the institution's staff that the participant has been residing in the institution for less than 90 days; and information on the previous living situation as being homeless in shelter or streets. Written verification should be used if available. Self-report is acceptable only as a last resort.

Category 4 – Fleeing/Attempting to Flee DV

Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing

Acceptable Evidence for Individuals Fleeing Domestic Violence:

- Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household; and where the safety of the household is not in jeopardy;

- Written observation by intake worker; or
- Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.
- If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

B. Eligible Activities & Costs

Rapid Re-Housing Assistance includes housing relocation and stabilization services and short and/or medium-term rental assistance necessary to help an individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Rapid re-housing must be provided in accordance with housing relocation/stabilization requirements, short- and/or medium-term rental assistance requirements, and written standards and procedures established under 24 CFR 576.400, as amended. Individuals or families defined as Category 1, literally homeless, or Category 4, fleeing/attempting to flee DV (where the individual or family also meets the criteria for category 1) are eligible for assistance in rapid re-housing.

Housing Relocation and Stabilization Services

Eligible activities for Rapid Re-Housing assistance includes: financial assistance costs, housing search and placement services; housing stability case management, mediation, legal services, credit repair, short-term and medium-term housing either tenant or project based.

Subrecipient Agencies can set a maximum dollar amount that a participant may receive financial assistance for each service listed and set a maximum period of time for which a participant may receive these types of assistance; however, the time may not exceed 24 months during any 3-year period. Fund limits for this section will apply to the total assistance an individual receives, either as an individual or as part of a family. Do not provide this assistance to a participant who is receiving the same type of assistance through other public sources or those receiving replacement-housing payments under the URA during the period covered by the URA payments.

Financial Assistance Costs include:

- Rental Application fees.
- Security Deposits equal to or not more than 2 month's rent.
- Last Month's Rent Paid to the owner of housing at the time security deposit and first month's rent are paid. Amount is included in the participant's total rental assistance.
- Moving Costs Moving costs include truck rental, hiring a moving company, and temporary Storage fees. Storage fees may be up to 3 month's rent, providing that costs

are not incurred until after program participation begins and before move-in. Moving costs may not include arrearage temporary storage fees.

- Standard Utility Deposit Standard deposit required by the utility company for all customers. Includes gas, electric, water, and sewer.
- Standard Utility Payments Up to 24 months during any three-year period of utility payments per participant, per service, including up to six months of arrears, per service. Includes gas, electric, water, and sewer.

Housing Search and Placement eligible costs include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements of habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management includes:

Assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a program participant who is already in permanent housing (not to exceed 24 months) or to assist a program participant to overcoming immediate barriers to obtaining housing (not to exceed 30 days) Housing Stability Case Management eligible costs include:

- Using centralized or coordinated assessment systems
- Conducting initial evaluations including, verifying and documenting eligibility
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting re-evaluations

Mediation, providing that mediation is necessary to prevent the participant from losing their housing.

Legal Services must be necessary to resolve legal problems that prohibit the participant from obtaining or keeping housing. Legal Services eligible costs include:

- Landlord/tenant matters
- Child support
- Guardianship
- Paternity
- Emancipation
- Legal separation
- Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- Appeal of veterans and public benefit claim denials
- Resolution of outstanding criminal warrants

Legal services for immigration and citizenship matters and issues relating to mortgages, retainer fee arrangements, and contingency fee arrangement are ineligible costs.

Credit Repair: This does not include the payment or modification of debt. Eligible costs include:

- Credit counseling
- Household budgeting
- Managing money
- Accessing a free personal credit report
- Resolving personal credit problems

Case Management Requirements to Help Ensure Housing Stability: Rapid Re-Housing

Assistance through the Emergency Solutions Grants (ESG) program is intended to be provided as a part of a system-wide approach. In order to evaluate and coordinate services to the greatest extent possible, ESG Subrecipients providing ESG-funded rental assistance or housing and relocation services under the Rapid Re-Housing and/or Homelessness Prevention components must:

- Develop a plan with each program participant on how they will retain permanent housing after the ESG assistance ends.
- Require program participants to meet with a case manager not less than once per month while they are receiving ESG-assistance to implement the plan and monitor progress towards housing stability.
- Assist program participants in obtaining appropriate supportive services, as well as connecting them to other federal, state, local, and private benefits and services for which they may be eligible. This includes, but is not limited to, Medicaid, SNAP, WIC, unemployment insurance, SSI/SSDI, services for veterans, and TANF.

- Have written policies and procedures for coordination among different providers of services in the community. Activities must be coordinated and integrated to the maximum extent practicable.

Housing Requirements

- Subrecipient must ensure compliance with Habitability Standards
- Subrecipient must ensure compliance with lead-based paint requirement
- Subrecipient must ensure compliance with Fair Market Rent (FMR) and Rental Reasonableness
 - (a) Assisted units must be at or below FMR for area and unit size for rent plus utilities.
 - (b) unit must be evaluated for “Rent Reasonableness.”
- Short- and Medium-Term Rental Assistance s Restrictions – program participants may not receive more than 24 months of rental assistance during any 3-year period including arrears, or any combination of rental assistance payments. Rental assistance may be tenant or project based.
- Rental Assistance Agreement and Lease Standards
 - (a) The rental assistance agreement must set forth the terms under which rental assistance will be provided.
 - (b) Each participant receiving rental assistance must have a legally binding, written lease (between the owner and participant) for the rental unit, unless, the assistance is solely for rental arrears.
 - (c) Project-based rental assistance leases must have an initial term of one year.

ESG funds cannot use with other subsidies

No rental assistance can be provided to a household receiving rental assistance from another public source for the same time period (except 6 months of arrears) (b) Rental assistance may not be provided to participants who are currently receiving replacement housing payments under the URA (Example: Persons living in public housing units, using housing choice vouchers, or residing in project-based assisted unit cannot receive monthly rental assistance under ESG)

Late Payments

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant’s lease and the Subrecipient Agency must make timely payments to owners in accordance with the rental assistance agreement. The Subrecipient Agency is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.

C. Policy for Re-Payment of Security or Utility Deposits

If a program participant leaves the program but remains in the unit for which the deposits were paid, the landlord will continue to hold the security deposit as provided in the lease, and

the utility company will continue to hold any utility deposit as provided in the utility contract. The terms of the lease and state or local law will dictate what the landlord may do with the security deposit when the tenant leaves the unit. And the terms of the utility contract and state or local law will dictate what the utility company may do with the utility deposit when the utility contract terminates. The ESG interim rule does not require security or utility deposits to be returned to the program either when the program participant leaves the program or when the lease or utility contract terminates. ESG recipients may establish their own policies regarding security and utility deposit repayments to the extent allowable under state and local law. However, any repayment of a security or utility deposit to the recipient or Subrecipient (or contractor of the recipient or Subrecipient) is program income under 24 CFR 576.2, must be used as match in accordance with 24 CFR 576.201, and must be tracked in accordance with the recordkeeping requirements for match and program income under 24 CFR 576.500(o) and 576.500(u)(3).

Based on the above guidance, Anne Arundel County has established that security or utility deposits do not need to be returned to the program either when the program participant leaves the program or when the lease or utility contract terminates.

D. Ineligible Activities and Costs

Among the ineligible activities associated with ESG funding of any category are the following (not an inclusive list):

- Funds cannot be used to supplant existing mainstream resources;
- Payments can only be made to third parties such as landlords or utility companies; payments cannot under any circumstance be made to program participants;
- An assisted property must not be owned by the Subgrantee Agency, Subrecipient or the parent subsidiary or affiliated organization of the Subgrantee Agency/Subrecipient; and Community Services
- Mortgage assistance (including land contracts);
- Rental assistance payments on behalf of eligible individuals or families for the same period of time and for the same cost types as are being provided through any other federal, State, or local housing subsidy program;
- Furniture (Subgrantee Agencies are encouraged to use existing community sources);
- Credit card bills or other consumer debt (including child support and any garnishments);
- Entertainment activities;
- Cash assistance;
- Development of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons. Note: Persons whose discharge from public-funded institutions is imminent are eligible to receive financial assistance through ESG and Community Services

VII. General Rapid Re-Housing Requirements

A. Intake and Assessment Procedures for Rapid Re-Housing

Intake

The initial point of contact includes prioritizing households based on the severity of their housing crisis and targets the most appropriate response. The intent is to discern *primary* need and the *urgency* of the need.

- (1) All households will be screened either by phone or in person.
- (2) Households who are presented with immediate safety issues will be re-directed appropriately (Domestic Violence or 911.)
- (3) Intakes are required to determine primary issues.
- (4) If the intake concludes there is not an immediate housing need (but other needs are present), households will be referred to the appropriate resource to address the need (e.g. food assistance through DHS, mental health, etc.), and a housing plan is not necessary.
- (5) If the intake concludes there is an immediate housing need, households will proceed to a full housing assessment or be scheduled for a housing assessment within two business days, if possible.
- (6) Sharing of participant information within HMIS between agencies.

Initial Evaluation

As a part of the initial evaluation, subrecipients are required to determine the amount and type of assistance that the individual or family need to regain stability in permanent housing. They should consider this carefully, and not provide more than the amount needed to help the program participant regain stability in the program participant's current permanent housing or move to permanent housing and achieve stability in that housing.

Subrecipients must have written standards for evaluating and re-evaluating eligibility for ESG assistance.

Additionally, all program participants must be assisted, as needed, in obtaining services and financial assistance through other homeless and public assistance program. Program participants lack financial resources and support networks needed to obtain immediate housing or remain in existing housing and have no appropriate subsequent housing options that have been identified. Each program participant receiving rapid rehousing assistance are required to meet regularly with a case manager (except where prohibited by Violence Against Women Act and the Family Violence Prevention and Services Act) and the case manager must develop an individualized plan to help each program participant retain permanent housing after the ESG assistance ends.

Housing Assessments

Depending on the urgency and priority identified in the intake, the ESG program will conduct a comprehensive assessment with the household. The assessment, at a minimum, will identify the housing needs of the household. The assessment will function as the basis for creating a housing plan, which serves as the foundation for resource coordination and resolution of the housing crisis. It will require staffing familiar with housing resources, with the local housing market, and with services.

1. Case Managers/Intake Workers may utilize the assessment tool within HMIS, focusing on issues related to obtaining and maintaining housing.
2. Assessments will be conducted in person.
3. Case Managers/Intake Workers will identify the most appropriate resources for which the household may be eligible and provide this information to the household both verbally and in a written form as part of the Housing Plan. If the household agrees, the Housing Plan can be shared with other providers to assist in obtaining resources or housing.

Housing Plan

A Housing Plan **must** be completed for all individuals that receive a housing assessment **and** are determined eligible for services. (If the household does **not** meet program eligibility, e.g. over income, a housing plan does **not** need to be done). The Housing Plan is intended to be a guide for both the household and the service agencies. Housing Plans must be framed to include:

1. A focus on obtaining or maintaining housing;
2. Defined goals, outcomes and timelines, as well as documentation of frequency of meetings for follow-up;
3. An identification of needed community resources;
4. Referrals to mainstream services, as needed;
5. Budget education and tenant education;
6. An attached copy of the housing assessment.

Re-Evaluations of Eligibility

Program participants receiving Rapid Re-Housing assistance must only be re-evaluated at least once annually.

At a minimum, *each re-evaluation* must establish and document:

- The program participant does not have an annual income *that exceeds 30% of median family income for the area*. Income must be **below** 30%, so 29.9% would be acceptable. If a Rapid Re-Housing household income is determined to be at 31% of AMI at the time of the re-assessment, the household is no longer eligible for assistance. Income must be **at or below** 30% to be acceptable.

- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Programs must evaluate households for eligibility, appropriateness of services and assistance. Conduct re-assessments by telephone in cases where distance prohibits a face-to-face assessment; face-to-face assessments are encouraged whenever possible (telephone assessment is limited to once per household receiving assistance). If unrelated individuals are joint parties to a lease, income for all adults in the household must be included when determining eligibility.

B. General Requirements

Lease Agreements

A lease must be in place and the program participant must be on the lease in order to use ESG funds for the rent or security deposit. Do not assist an individual renting from a friend or relative if a legal lease is not in place. In cases where an individual is renting a unit from a friend or relative and a legal lease is in place, programs providing assistance must ensure that the arrangement is not in violation of the conflict of interest provisions outlined in the ESG Notice (e.g. the rent charged and the terms of the lease must be the same for the participant as they are for other tenants renting comparable units).

Tenant-Based Rental Assistance

A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. Units should be located in Anne Arundel County.

The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease;
2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG rental assistance.

Rent Restrictions

Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, as amended, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507, as amended.

Rental Assistance Agreement

The Subrecipient Agency may make rental assistance payments only to an owner with whom the Subgrantee Agency has entered into a rental assistance agreement. The rental assistance

agreement must set forth the terms under which Subgrantee Agency provides rental assistance, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the Subgrantee Agency a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

Habitability Standards

Subrecipients must conduct a habitability standard inspection on any unit that a participant will be moving into using ESG funds for rental and/or security deposit assistance. Sponsoring agencies must certify that the unit has passed habitability standards before any ESG funds may be released. Conduct inspections upon initial occupancy, on an annual basis for the term of ESG assistance, and upon a change of tenancy. Habitability Standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the Habitability Standards - programs could use either standard. Units also need to be compliant with local housing codes relating to occupancy, health, and safety standards. If there are local housing codes, the program must comply with the more stringent of the two.

Lead-Based Paint Requirements

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead- Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG.

Specifically, the regulations apply to the unit and to common areas servicing the unit when ESG assistance is provided to a unit constructed before 1978 in which a child under the age of six *or a pregnant women* will be residing, unless it meets one of the following criteria (i) it is a zero-bedroom or SRO-sized unit; (ii) it is housing for the elderly and there are no children under the age of six; (iii) a lead-based paint inspection has been conducted in accordance with HUD regulations and found not to have lead-based paint; or (iv) the property has had all lead-based paint identified and removed in accordance with HUD regulations.

An initial visual assessment and periodic inspections are required for as long as ESG funds are being used to assist the family in the unit. Finally, the owner must provide a notice to occupants if an evaluation and hazard reduction activities have taken place, in accordance with 24 CFR part 5.125.

Fair Market Rent Requirements

When using ESG funds for rental assistance, Subrecipient Agencies must consult the most current FMR published for their geographic area and document FMR for all units.

To calculate the gross rent for purposes of determining whether it meets the FMR, consider the entire housing cost. This includes rent and the cost of utilities that must, according to the lease, be the responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and

trash. However, telephone, cable or satellite television service, and internet service are not included in FMRs, and are not allowable costs under ESG. The FMR also does not include pet fees or late fees that the program participant may accrue for failing to pay the rent by the due date established in the lease. HUD sets FMRs to ensure that a reasonable supply of modest but adequate rental housing is available to HUD program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. **Note:** Once a unit is determined to meet the FMR and rent reasonableness requirements, use ESG funds to pay for the actual utility costs. Use the utility allowance calculation **only** to determine whether the unit meets the FMR standard.

Example:

A case manager is working to provide rapid re-housing to a mother and son and has identified a 2-bedroom unit at a rent of \$1,200 per month, not including utilities (the tenant's responsibility). The utility allowance established by the PHA is \$150. Therefore, the gross rent is \$1,350. A check of three similar units in the neighborhood reveals that the reasonable rent is \$1,400 for that area of the city. However, the FMR for the jurisdiction is \$1,300. This means the family cannot be assisted with ESG in this unit because the gross rent exceeds the FMR.

Rent Reasonableness Requirements

Once a participant locates a rental unit, sponsoring agencies must ensure that ESG funds used for rental assistance do not exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable non-luxury unassisted units.

Occupancy Standards

The following basic standards can be modified to take into consideration specific household composition and circumstances (i.e., pending child custody cases, chronic illnesses, family member who is absent most of the time).

1. No more than two persons are required to occupy a bedroom;
2. Persons of different generations (i.e., grandparents, parents, children), persons of the opposite sex (other than spouses/couples) and unrelated adults are not required to share a bedroom;
3. Children of the same sex (regardless of age) and couples co-habiting (whether or not legally married) must share the same bedroom for purpose of assigning the number of bedrooms;

4. A live-in care attendant who is not a member of the family is not required to share a bedroom with another household member;
5. Individual medical problems (i.e., chronic illness) sometimes require either separate bedrooms for household members who would otherwise be required to share a bedroom or an extra bedroom to store medical equipment;
6. In most instances, a bedroom is not provided for a family member who will be absent most of the time, such as a member who is away in the military.

Occupancy standards are used to provide consistent criteria for determining the unit size for which the household is eligible and thus, the amount of assistance to be provided. Fair housing rules permit a household to select smaller units that do not create seriously overcrowded conditions. A tenant may select a larger unit if it meets the FMR for the actual number of bedrooms for which they are eligible according to the eligibility guidelines. Tenants are not allowed to give the landlord additional funds for larger units.

1. *Undersized Units:* If a family elects to occupy a unit with fewer bedrooms than specified in the Occupancy Guidelines, the FMR is based on the actual number of bedrooms;
2. *Oversized Units:* If a family elects to occupy a unit with more bedrooms than specified in the Occupancy Guidelines, the FMR is based on the number of bedrooms specified in the Occupancy Guidelines;
3. If an additional bedroom is required for an individual who would normally be required to share a room, the reason must be documented in the file. For example: If an additional room is needed because of a medical condition, documentation may be a note from their doctor; otherwise, if the case manager determines an additional room is needed (medical condition, care-giver, medical equipment etc.) the case manager must document the reason in the case management notes;
4. In cases where college students and children staying only for weekends etc., the amount of time spent in the unit should be taken into consideration before assigning additional bedroom(s). ESG assistance is short-term and a smaller unit is acceptable if it does not create serious overcrowding; a living room can be counted as a sleeping room. If student/children will be in the unit the majority of the time and future rent will not be a burden, then an additional bedroom can be assigned.
5. A separate bedroom cannot be issued for an unborn child. Once the baby is born a second bedroom can be issued unless the baby has an older, same sex sibling who has already been issued a bedroom.

Calculating Income – General Guidelines

Once all sources of income are known and verified, owners must convert reported income to an annual figure. Convert periodic wages to annual income by multiplying:

1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);
2. Weekly wages by 52;
3. Bi-weekly wages (paid every other week) by 26;
4. Semi-monthly wages (paid twice each month) by 24; and
5. Monthly wages by 12.

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work. HUD's Occupancy Handbook, Chapter 5: Determining Income and Calculating Rent is available here:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_35649.pdf

Anne Arundel County does not require program participants receiving Rapid Re-Housing assistance to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance outside of the re-evaluation process; therefore, participants receiving Rapid Re-Housing assistance must only be re-evaluation at least once annually.

C. Standards for Assistance

Standards for Amount of Rental Assistance

Providers shall determine the type, maximum amount and duration of housing stabilization and/or relocation services for individuals and families who are in need of rapid re-housing assistance through the initial evaluation, re-evaluation and ongoing case management processes.

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- 1) Providers may provide up to 100% of the cost of rent in rental assistance to participants. However, to maximize the number of households that can be served with rapid re-housing resources, it is expected that providers will provide the level of need based on the goal of providing only what is necessary for each household to be stably housed for the long term.
- 2) Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD.

- 3) The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

For more details see sections 578.37 and 578.51 of the HUD CoC rapid re-housing and rental assistance guidelines.

Standards for Duration of Assistance

Subrecipients may provide a program participant with between three months and 24 months of rental assistance; however, program should determine the minimum assistance necessary to ensure a program participant is successfully and stably housed.

There must be a lease between the landlord and the tenant and the leases must be for at least one-year, renewable for at least one year and terminable only for cause.

Standards for Type of Assistance

Subrecipients may use funds for rental assistance costs and eligible services, including: security deposits (up to two months), first month's rent and/or last month's rent, eligible supportive services, and property damage (up to one month)

The Equal Access Rule Definition of family: Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

3. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,
4. A group of persons residing together, and such group includes, but is not limited to:
 - a. A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - b. An elderly family;
 - c. A near-elderly family;
 - d. A disabled family;
 - e. A displaced family; and,
 - f. The remaining member of a tenant family.

In general, this definition of "family" applies to both the ESG and CoC Program rules. However, the McKinney-Vento Act, as amended by the HEARTH Act, distinguishes individuals from families. Therefore, paragraph (1) of the definition of family under the Equal Access Rule is considered an individual under the CoC and ESG programs and the definition of family for these programs is defined as follows:

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or

without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

Eligibility for assistance under the ESG Program when the individual members of the family are residing in different places upon presentation to the project: Under HUD's Homeless Assistance Programs, persons presenting together for assistance regardless of marital status, actual or perceived sexual orientation, or gender identity are considered a family and can be served as a family in the ESG and CoC programs.

In general, when determining the homeless status of families where the individual members are not residing together when they present for intake into the project (e.g. one parent is staying in an emergency shelter and the other parent is staying with a child at a friend's house), eligibility must be assessed using:

1. The adult head of household (in cases where more than one adult is present in the family, HUD allows the family to choose which adult will be the head of household, for application purposes); or
2. The minor head of household when no adult is present.

The Coalition has the discretion to specify additional eligibility criteria, such as income limits, if voted in by the Board of Directors.

VIII. Homelessness Prevention Policies and Procedures

Beginning in Local Fiscal Year 2020, the County has prioritized a portion of ESG funding for homelessness prevention activities. Homelessness prevention activities are defined as: housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the HUD homeless definition.

A. Eligible Activities and Costs

Eligible costs under the homelessness prevention program include:

- Rental Assistance: rental assistance and rental arrears
- Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

B. Participant Eligibility Criteria

All participants must meet the HUD's definition of at-risk of homelessness, as defined as Category II:

Category 2 – Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Documentation required for prevention service eligibility include:

- A court order resulting from an eviction action notifying individual or family that they must leave; or
- For individuals and families leaving a hotel or motel, evidence they lack the financial resources to stay; or a documented and verified oral statement; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing.

C. General Requirements and Standards for Assistance

Standards for Determining Participant Share of Rent and Utilities Costs

The ESG funded Prevention activities may provide funds to pay a portion or all of a client's rent as well as one-time payment for rental arrears (not to exceed 6 months of rent in arrears). The total length of assistance may not exceed 12 months in duration.

Standards for Determining Type, Amount, and Duration of Services

All prevention participants will be required to participate in stabilization services, including case management, while receiving tenant based rental assistance. The service will be provided by AHOH. A housing stability plan will be developed for each participant and may include ensuring the participant receives all eligible mainstream benefits, job counseling, referral to workforce development services, transportation services, help with budgeting, etc. At a minimum, the case manager will have contact with the participant monthly to ensure the household is stable and the rent is paid. A participant may choose to continue stabilization services for an additional six months, but will receive no more than 12 months of assistance.

Standards for Determining Length and Level of Rental Assistance

The ESG funded Prevention activities will provide rental assistance payment to participant households for a period not to exceed 12 months, however, the goal is to provide between one to three months of assistance.

Providers shall determine the type, maximum amount and duration of housing stabilization and/or relocation services for individuals and families who are in need of rapid re-housing assistance through the initial evaluation, re-evaluation and ongoing case management processes. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- Providers may provide up to 100 percent of the cost of rent in rental assistance to participants. However, to maximize the number of households that can be served with prevention resources, it is expected that providers will provide the level of need based on the goal of providing only what is necessary for each household to be stably housed for the long term.
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

Other stabilization financial assistance, such as help with rental application fees, security deposit, last month's rent, utility deposits or arrears, and moving costs will be provided based on the philosophy of providing the least amount of assistance necessary to help a family become stably housed, as well as the availability of funds. Specifically, assistance with security deposits can equal no more than two months of rental payment.

Prioritization of Prevention Assistance

Priority will be given to homeless individuals or families who demonstrate they are able to afford and maintain their housing upon program completion.

IX. Documentation Standards

In general, there is an order of preference for all documentation types and projects must document due diligence of efforts to obtain all documentation. Circumstances, as well as the type of services or housing received, will affect the ability of intake workers/case managers to obtain some forms of documentation. The order of priority among documentation is third-party documentation first, intake worker/case manager observation second, and certification by the individual or head of household seeking assistance third.

Third-party Documentation - Where it is available, is the preferable form of documentation (financial, homelessness, disability, etc.). Recordkeeping requirements allow already available documentation, where it is available, as third-party documentation. Already available documentation includes certification or other appropriate service transactions recorded in a Homeless Management Information System (HMIS) or other database that meet certain standards. Information recorded in an HMIS must retain an auditable history of all entries, including the person who entered the data; the date of entry, and the change made, and must prevent overrides of the dates when changes are made. Already available documentation may also include discharge paperwork, to verify a stay in an institution, shelter, or other facility.

However, for permanent housing, third-party documentation is required, such as pay stubs, copy of recent bank statements, or filed tax documents.

Example of Documentation Documenting a disability would not include participant self-certification, as disabilities would have written documentation of some type. You could document a disability by:

- (1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR
- (2) Written verification from the Social Security Administration; OR
- (3) The receipt of a disability check; OR
- (4) Intake worker/case manager-recorded observation of a disability that, no later than 45

days of the application for assistance, is confirmed and accompanied by evidence HUD expects conscientious and reasonable efforts to use the highest documentation standard possible. Accept documentation dated within 30 days prior to the time of application.

See "Appendices" section of this manual for the following information:

- (1) Homeless/At-Risk acceptable documentation requirements
- (2) Housing Options/Resources eligibility documentation requirements
- (3) Rapid Re-Housing Eligibility Documentation for Homeless Persons

Case Manager Worker Observation

May include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the AHOH intake worker/case manager. Where the intake worker/case manager is not able to obtain a written or oral statement from a social worker, case manager, or other appropriate official at an institution, shelter, or other facility, the intake worker/case manager may document his or her due diligence in attempting to obtain a statement from the appropriate official in the case file.

If an oral statement is used, a written certification by the person making the oral statement is required. Use oral statements when third-party documentation is not available. The intake worker/case manager, through the intake worker's/case manager's written certification, may verify oral statements. Intake workers/case managers must still document his or her due diligence in attempting to obtain the original verification.

Participant Self-Certification

Requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying.

Intake/Participant File

Document all participant files Participant File Checklist. Complete the Intake, Assessment, and Housing Plan in HMIS. Files must also contain case management notes.

X. Participant File Documentation Requirements

The Subrecipient Agency is required to maintain all Financial Records of their ESG participants; Subrecipients may retain the participant's file information. Document all participant files using the forms provided by OHCS as outlined on the Participant File Checklist. Complete the Intake, Assessment, and Housing Plan in HMIS. Place a copy of these documents in the participant's file. Files must also contain case management notes.

- 1. Release of Information Form (Required for Shelter/Rapid Re-Housing Programs).**
Each HH member, age 18 or older, with a copy in file, must sign a release of Information form. Per HMIS procedure, general releases are not allowed.
- 2. Screening Assessment (Required for Shelter/Rapid Re-Housing Programs).**
Conducts a complete, comprehensive housing assessment with the HH. The assessment will function as the basis for creating the "Housing Plan" which serves as the foundation for resource coordination and resolution of the housing crisis. Each HH should have a copy of the screening assessment in the client file. Housing assessments may be completed through HMIS and a printed, hard-copy kept in the client file.

3. **HMIS** (Required for Shelter/Rapid Re-Housing Programs).
At minimum, verification of HMIS intake entry/exit, minimum required data elements.
4. **U.S. Identification** (Required for Shelter/Rapid Re-Housing Programs).
Required for all household members—see reverse for types of proofs acceptable.

There must be documentation of identification for all HH members, in the client file.
Documentation may be a copy of the following:

- (1) Driver's license
- (2) Social Security card
- (3) Medicaid Card (as a last resort for children only)
- (4) Birth certificate
- (5) Passport
- (6) Naturalization papers
- (7) Church-issued baptismal certificate
- (8) U.S. military discharge papers (DD-214)
- (9) Adoption papers
- (10) Department of Human Services ID (for children only)
- (11) Custody agreement
- (12) Affidavit of parentage

5. **Verification of homelessness** (Required for Shelter/Rapid Re-Housing Programs).
The agency must certify the client's homelessness status indicating current living situation and provide appropriate documentation. A copy of this certification must be in the client file. Valid proof of homelessness is required. See Appendix X for recordkeeping requirements. Self-Certification should be used as last resort only if required verifications/other documents cannot be provided.
6. **Verification of Income** (only Rapid Re-Housing at re-certification.) Agencies must record all attempts (phone logs, email correspondence, copies of certified letters, etc.) to obtain required verifications in the order specified. Staff must provide an explanation (detail of outcomes including obstacles) on the form if utilizing verification out of the hierarchy sequence. All sources of HH income (for all adult members) must be verified and documented at intake and every 3 months for prevention and annually for rapid re-housing, to determine program eligibility, with a copy kept in the client file. To be eligible for assistance, gross HH income must be below 30% AMI for the county in which the HH is residing. Some examples of common acceptable documentation:

- a. **Earned Income** – pay stubs, previously filed taxes, bank statements, etc.

- b. **Unearned Income** – statements from government official/agency, unemployment or disability pay stubs, most recent benefit or disability income notice from agency.

7. Housing Plan (Required for Rapid Re-Housing Program).

A Housing Plan must be completed for all individuals that receive a housing assessment and are determined eligible for services. The Housing Plan is intended to be a guide for both the HH and the service agencies. Keep a copy of the Housing Plan in the client's file.

8. Copy of signed Lease and the Rental Agreement (Required for Rapid Re-Housing Program).

A lease is required for HH receiving financial assistance. Financial assistance includes:

- (1) Rental assistance
- (2) Security deposits
- (3) Rental arrearages
- (4) Utility payment/deposits

All HH members must be listed on the lease/rental agreement and a copy must be maintained in the client file. For HH moving into a new unit, the unit must meet habitability standards before the lease is signed and the HH moves in. For HH already residing in a unit, the unit must meet habitability standards before financial assistance can be provided.

If rental and utility arrearages are paid, the participant must have had a valid lease in place covering the arrearage period. The rental arrearage amount paid each month cannot exceed the FMR (see "FMR" section of this manual for more information).

If the Landlord agrees to lower the rent to comply with the FMR, a new lease or lease addendum must be signed stating the new rental amount and a copy placed in the file. The rent amount charged after the household's leasing assistance has ended is between the landlord and the tenant.

9. Utility Arrearages from a Previous Address for re-housing Participants (Required for Rapid Re-Housing Program).

Utility arrearages for a previous address may be made, regardless if it was not the household's last address; however, the following guidelines must be followed:

- a. Utility arrearage payments cannot exceed \$1,500;
- b. If the utility arrearage is over the \$1,500 maximum, the case manager is required to work with the utility company to set-up a payment plan between the

household and the utility company and/or ask the utility company to forgive the debt.

- c. Before making payment for utility arrearages, the case manager must document in the participant's file with either verbal or written documentation from the utility company that by paying a specified amount, again up to \$1,500, the utilities will be turned on for the household by the utility company at the new address.

10. Proof and Assessment of LBP - Pamphlet, *Protect Your Family from Lead in Your Home* (Required for Rapid Re-Housing Program).

All HH must be provided a copy of the HUD's pamphlet *Protect Your Family from Lead in Your Home*. The LBP pamphlet may be down loaded from HUD's LBP website: http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11875.pdf

11. Owner Certification of Lead-Based Paint

LBP inspection is required for rapid re-housing assistance for properties built before 1978, **and** if a child age 6 or younger **or** a pregnant woman will be residing in the unit. The inspection may be visual; however, if the child age 6 or younger has been identified with an Identified Environmental Intervention Blood Lead Level, the inspection must be done by a Certified LBP Risk. All HH must be provided with the HUD pamphlet, *Protect Your Family from Lead in Your Home*. A copy of this certification must remain in the client file.

12. Housing Standards (Required for Rapid Re-Housing Program)

Copies of habitability standard inspections on any unit that a participant will be moving into using ESG funds for rental and/or security deposit assistance.

XI. Federal and Other Requirements

Records Retention

Programs are responsible for verifying and documenting eligibility of all ESG applicants prior to providing assistance. Programs are responsible for maintaining this documentation in the ESG participant case file. Retain all records pertaining to each fiscal year of ESG funds for the greater of 5 years or the period specified below. Substitute copies made by microfilming, photocopying, or similar methods for the original records, if needed.

Type of Information Record Retention Period

All program records for each fiscal year of ESG funds 5 years (or longer). Program participant records 5 years after year of expenditure of all funds from grant under which participant was served

Access

Allow HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representative, and Oregon Housing and Community Services access to program/financial records. Rights of access are not limited to the required retention period, but last as long as you retain the records. The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligation of confidentiality) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.

Confidentiality

Keep secure and confidential all records containing personally identifying information of any individual or family who applies for and/or received ESG assistance. Do not make public the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG, except with written authorization of the person responsible for the operation of the project. Do not make public the address or location of any housing of a program participant, except as provided under a pre-existing privacy policy of the Recipient or Subgrantee Agency and consistent with state and local laws regarding privacy and obligations of confidentiality.

Termination of Assistance

Subrecipient agencies may terminate assistance to a program participant who violates program requirements. Subrecipient agencies may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the Subrecipient agency must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:

- written notice to the program participant containing a clear statement of the reasons for termination;
- a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- prompt written notice of the final decision to the program participant.

The applicant/client may appeal Subrecipients decision to ACDS.

Sanctions

If ACDS determines that a Subrecipient is not complying with the requirements of this guide or other applicable federal laws, the grantee will take appropriate actions, which may include;

- a) issuing a warning letter that further failure to comply with such requirements will result in a more serious sanction; or
- b) directing the Subrecipient to cease incurring costs with grant funds.

Any grant amounts that become available to ACDS as a result of a sanction will be made available (as soon as practical) to other agencies.

Monitoring

ACDS is responsible for monitoring all ESG activities, including activities that are carried out by a Subrecipient, to ensure that the program requirements established by the HUD Notice and any subsequent guidance are met. ACDS will follow the monitoring procedures it established in its substantial amendment submitted for ESG. ACDS has staff responsible for the continuous monitoring of all ESG Subrecipient activities. This will be accomplished with regular site visits to sponsoring agencies and monthly review of all grant activity reports required of sponsoring agencies. This individual will also provide support and mentoring, as needed, to Subrecipient staff hired to carry out ESG activities. Monitoring of agencies may be conducted by ACDS, local HUD Office of Community Planning and Development, HUD's Office of Special Needs Assistance Programs, HUD's Office of Inspector General, HUD's Office of Fair Housing and Equal Opportunity, or another federal agency to determine whether the Subrecipient complied with the requirements of this program.

Conflicts of Interest

With respect to the use of ESG funds to procure services, equipment, supplies or other property, states, territories and units of general local government that receive ESG funds shall comply with 24 CFR 85.36(b)(3), and nonprofit sponsoring agencies shall comply with 24 CFR 84.42. With respect to all other decisions involving the use of ESG funds, the following restriction shall apply: No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

Environmental Requirements

The HUD Notice does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing (other than tenant-based rental assistance), rehabilitation, alteration, demolition, or new construction, or establish, revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under 24 CFR 50.19(c)(1), the HUD Notice is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C.4321). Moreover, consistent with the provisions for administrative and management expenses, tenant based rental assistance, and supportive services in 24 CFR 50.19(b)(3), (11), and (12), the eligible activities to be assisted under the HUD Notice are

categorically excluded from the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and are not subject to environmental review under the related laws and authorities.

Nondiscrimination and Equal Opportunity Requirements

Sponsoring agencies must comply with all applicable fair housing and civil rights requirements stated in 24 CFR 5.105(a). In addition, sponsoring agencies must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program. Among other things, this means that each subrecipient must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that LEP persons have meaningful access to ESG assistance. In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6. If the procedures that the Subrecipient intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the Subrecipient must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Affirmatively Furthering Fair Housing

Under section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. Sponsoring agencies will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include (i) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (ii) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (iii) providing fair housing counseling services or referrals to fair housing agencies; (iv) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800- 669-9777; and (v) recruiting landlords and service providers in areas that expand housing choice to program participants.

Lead-Based Paint Requirements

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the

Residential Lead- Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG.

Uniform Administrative Requirements

Nonprofit sponsoring agencies shall be subject to the requirements of 24 CFR part 84.

Equal Participation of Religious Organizations

Sponsoring agencies that are religious or faith-based are eligible, on the same basis as any other organization, to participate in ESG. Neither the federal government nor a grantee shall discriminate against an organization on the basis of the organization's religious character or affiliation. Sponsoring agencies that are directly funded under ESG may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for the program participants. A religious organization that participates in ESG will retain its independence from federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided it does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, ESG-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents. Sponsoring agencies that participate in the ESG program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

Lobbying and Disclosure Requirements

The disclosure requirements and prohibitions of section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (the Byrd Amendment), and implementing regulations at 24 CF R part 87, apply to ESG. Applicants must disclose, using Standard Form LLL (SF-LLL) "Disclosure of Lobbying Activities," any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts.

Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations at 24 CFR part 21 apply to ESG.

XI. Lead-Based Paint Guidance

Lead-Based Paint Requirements

Permanent supportive housing and Rapid Re-Housing Programs are subject to all LBP regulations. These activities are subject to LBP regulations because the units assisted with these funds are not temporary residences and do not fall under the shelter exemption. The standards apply to any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless a child who is less than 6 years of age resides or is expected to reside in such housing) or any zero-bedroom dwelling or SRO unit. Properties that have been inspected according to HUD regulations and certified as having no lead paint and properties in which all lead-based paint was identified and removed according to HUD standards are also exempt. However, if federal funding is used in the provision of housing that is pre-1978, occupied by children under the age of six, and are not known to be free of lead-based paint contamination, then visual paint inspections are required along with corrective actions warranted by the severity of the condition.

LEAD BASED PAINT/LEAD SAFE HOUSING RULE REQUIREMENTS Summary		
Requirement	Determination	File Documentation
STEP ONE Assessment for Applicability to the Lead Safe Housing Rule (LSHR)	Evaluate each unit to determine if the unit was built after 1978 or meets an exemption/exemption (see below).	Forms: Assessment documentation either using Lead Rule Advisor Finds on HUD's website at https://portalapps.hud.gov/CORVID/HUDLBPAdvisor/welcome2.html Or complete paper screening. <i>Exemption Documentation should be in each client file regardless of overall program design (e.g. targeted to single disabled homeless adults.) If program is targeted use</i> Evidence the home was constructed after 1978.
STEP TWO	Assessment – obtain copy of Lead-Free Certificate from Landlord	Maintain the copy of Lead-Free Certification from the Landlord if a child under the age of six is expected to reside in the unit in program file and on any unit not meeting an LSHR exemption.

STEP THREE If the program is not exempt.	Assessment- Inspection	Copy of Inspection (see details under visual inspection below) for unit. Units with any findings of deteriorated paint are prohibited from participating in either the TBRA or Rapid Re-Housing Programs.
STEP FOUR	Inform and Provide Notice	All participants who reside in housing constructed prior to 1878 must receive a copy of “Protect Your Family” and a signed certification by the participant indicating receipt of this documentation must be in each client file.

Exceptions/Exemptions to the Requirement

There are certain exceptions to the requirement. Visual assessments are not triggered under the following circumstances:

- a. Housing units constructed after 1978;
- b. It is a zero-bedroom or SRO-sized unit;
- c. Housing “exclusively” for the elderly or persons with disabilities, with the provision that children less than six years of age will not reside in the dwelling unit.
- d. X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- e. The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- f. The unit has already undergone a visual assessment within the past 12 months –obtain documentation that a visual assessment has been conducted;
or
- g. It meets any of the other exemptions described in 24 CFR § 35.115(a).

If any of the conditions outlined above are met, recipients need to document the condition.

Visual Assessments

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. To prevent lead poisoning in young children, recipients must comply with the Lead-based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR § 35. The applicable parts of 24 CFR § 35 are as such:

1. For ESG-funded shelters and housing occupied by project participants, recipients must comply with subparts A, B, H, J, K, M and R.
2. For CoC-funded housing that receives project-based or sponsor-based rental assistance, recipients must comply with subparts A, B, H, and R.
3. For CoC-funded residential property receiving leasing, services or operating costs, recipients must comply with subparts A, B, K and R.

A lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household moving into or remaining in their current unit is being assisted with either ESG rent/utility assistance, ESG arrears assistance, CoC rent assistance, or it is a residential property using CoC funds to fund leasing, services or operating costs.
2. The unit was constructed prior to 1978.
3. A child under the age of six or a pregnant woman is, or will be, living in the unit.

For units and facilities that meet these conditions, recipients must conduct a visual assessment at least annually. For rental units, a visual assessment must be conducted prior to providing rent assistance and on an annual basis thereafter (as long as assistance is provided). The recipient must maintain the record on file with the inspection's record and readily available for review. Visual assessments must be conducted by a HUD-Certified Visual Assessor.

Agency staff may complete the Visual Assessment Training at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. The certificate of completion must be maintained on record and readily available for review. For rental units, documentation must be kept with the HQS or Habitability Standards Worksheet and maintained in the participant file.

Recipients must ensure that all participants who reside in housing that was constructed pre-1978 receive the **“Protect Your Family”** lead-based paint hazard brochure. In addition, owners must disclose the presence of lead-based paint and provide participants with any existing documentation on known lead-based paint hazards in the unit. Recipients must document that participants received this information and maintain this documentation in the participant files.

File Documentation Requirements

- LSHR Screening Worksheet
- Lead-Free Certificate from Landlord
- Copy of inspection (if applicable)
- Copy of evidence home was built after 1978
- Copy of receipt that participant received "Protect Your Family" brochure

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