MONTGOMERY COUNTY

Community Development Block Grant, Emergency Solutions Grant & HOME Investment Partnership Programs
Montgomery County, Pennsylvania

2016 Annual Action Plan

MONTGOMERY COUNTY HOUSING AND COMMUNITY DEVELOPMENT
Human Services Center
1430 DeKalb Street, 5th Floor
Norristown, PA 19404-0311
Emma W. Hertz, Administrator

PREPARED BY:

TRIAD ASSOCIATES
Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Montgomery County has prepared the Year 2 Action Plan as required under 24 CFR 91.220, the second of five such plans to be prepared as part of the County’s Five-Year Consolidated Plan process. The Montgomery County Five-Year Consolidated Plan covers the period FY 2015 to FY2019, (October 1, 2015 – September 30, 2019). The Action Plan for FY 2016 identifies the activities to be funded with Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) program funds received during the program year. Additionally, the Plan accounts for the County’s Affordable Housing Trust Fund (AHTF), administered by the Department of Housing and Community Development to advance goals consistent with those of the federal entitlement grant programs.

This plan was completed after soliciting comments from representatives of participating municipalities, citizens and social service agencies regarding community needs. While the purpose of the Consolidated Plan is to identify housing and community development needs, the purpose of the Action Plan is to develop specific goals and objectives to address those needs for the coming fiscal year. The Consolidated Plan and this Annual Action Plan allow the County to continue to receive federal housing and community development funds and must be submitted to the U.S. Department of Housing and Urban Development (HUD) by August 15, 2016.

In developing the Year 2 Consolidated Plan during the spring and summer of 2016, Montgomery County examined the priorities it had listed in its prior Five-Year Plan, including priority needs for housing, public facilities, infrastructure, public services and issues related to homelessness and special needs populations and established the following goals and objectives:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs and transitioning homeless persons and families into housing;
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate income residents throughout the County, increased housing opportunities and reinvestment in deteriorating neighborhoods; and
• To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability and the empowerment of low and moderate income persons to achieve self-sufficiency.

In addition to the Federal Funds, the County of Montgomery’s Department of Housing and Community Development administers funds through the County’s Affordable Housing Trust fund. The Pennsylvania Optional County Affordable Housing Funds Act of 1992 allows for an alternative method for county governments to raise revenues for affordable housing efforts. Using the Act, Montgomery County established an Affordable Housing Trust Fund. Each year Montgomery County allocates approximately two million dollars in trust fund dollars for affordable housing projects. A list of projects funded in 2016 is included in the Grantee Unique Appendices. The Department also administers funds through the Pennsylvania Housing Assistance Program. Funds from this program concentrate on assisting homeless residents.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Montgomery County is committed to allocating funds that serve the needs of the lowest income and most disadvantaged residents. Households with incomes less than 60% of the area median income, particularly those with extremely low incomes (less than 30% of area median income) are particular priorities. The County has also identified special needs individuals as among those who face the greatest challenges and who should receive high priority in the expenditure of federal funds, including at-risk children and youth, low income families, the homeless and persons threatened with homelessness, the elderly and persons with disabilities. The following needs, as they relate to the Plan's Goals, address this priority:

Goal: Provide Decent Housing - Need: 1) Through an Affordable Housing Strategy; 2) Investment in community development activities in lower income and deteriorating neighborhoods and in facilities that serve lower income populations; and 3) Supportive services to maintain independence.

By focusing on these needs, Montgomery County seeks to address community concerns as:

A need for additional affordable housing to address the growing gap between housing costs and local incomes, which leads to rising rates of overcrowding and overpayment for the County's lowest income residents;

Programs that improve community facilities and services, particularly in low income areas;
A network of shelter, housing and support services to prevent homelessness, move the homeless to permanent housing and independence and eliminate chronic homelessness;

Programs that promote economic development, create jobs and increase the job skills level of potential employees; and

Supportive services that increase the ability of seniors, persons with disabilities and others with special needs to live independently and avoid institutions.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Montgomery county prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY2014 (October 1, 2014 to September 30, 2015). This CAPER was the fifth of the prior five-year period and reported the FY2014 accomplishments of Montgomery County’s CDBG, HOME and ESG Programs.

During FY2014, Montgomery County expended $2,243,687.96 in CDBG funds, $957,350.35 in HOME Funds, $308,505.68 in ESG funds and $4,842,321.56 in County Affordable Housing Trust funds. In FY2014, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. The County met the timeliness goal set by HUD for FY2014. The county anticipates similar expenditures in FY2016.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

In accordance with 24 CFR 91.115(e), Montgomery County has adopted a Citizen Participation Plan describing the citizen participation requirements of its federal programs. The Citizen Participation Plan is on file at the Department of Housing and Community Development.

The County conducted public meetings to solicit input into the preparation of the FY 2016 Action Plan. The meetings were advertised in several regional newspapers and notices were sent to social service agencies and municipalities. The newspapers that the County advertises in are:

- Intelligencer, Doylestown
- The Mercury, Pottstown
- The Reporter, Lansdale
- The Times Herald, Norristown
Public hearings were held at three locations to provide citizens and organizations the opportunity to participate:

March 8, 2016,

6:00 pm Room SH221

Montgomery County Community College (Pottstown Campus), 101 College Drive, Pottstown

March 9, 2016

6 pm Willow Grove Courthouse Annex, Third floor, Willow Grove

March 10, 2016

6 pm Human Services Center, Room A/B, 1430 Dekalb Street, Norristown

The Plan was made available for display on the County’s website, www.montcopa.org, the County Office and the Commissioner’s Office. The availability of the plan and notice of a public hearing on July 19, 2016 were advertised in the regional newspapers; a copy of the advertisement is included in the Appendix.

A public hearing was held on July 19, 2016 to receive citizen comment on the proposed Action Plan.

5. **Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of public comments and consultation is included in the PR-10 Consultation and PR-15 Citizen Participation sections of this plan.

6. **Summary of comments or views not accepted and the reasons for not accepting them**

All comments were received.

7. **Summary**

The Montgomery County Action Plan is a product of a planning and coordination process required by the U.S. Department of Housing and Urban Development to prioritize the spending of Federal funding allocated to the County of Montgomery over the coming year. The Plan presents how Community
Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME) funds will be allocated to address the needs and priorities identified in the annual plan. The County's Plan has been developed so that it is consistent with and meets the three overreaching goals of creating 1) a viable sustainable urban community by providing decent housing, 2) a suitable living environment and 3) expanded economic opportunities all principally targeting low and moderate-income persons and programs that will address the needs of homeless and near homeless persons.

The County's Citizen Participation outreach was designed to encourage a broad participation from the County's residents, including non-English speaking persons. An approved Citizen Participation Plan was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public and data provided by HUD was used to identify the goals and activities of this Action Plan.
PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Department of Housing and Community Development</td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Department of Housing and Community Development</td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Department of Housing and Community Development</td>
</tr>
</tbody>
</table>

Table 1 - Responsible Agencies

Narrative (optional)

The lead agency for the Action Plan is the Montgomery County Department of Housing and Community Development which oversees the administration of all CDBG, HOME and ESG entitlement programs in addition to the County Affordable Housing Trust Fund.

In addition, the Montgomery County Housing Authority (MCHA) will play a large role in providing and managing housing programs covered by this plan. Projects are also coordinated with various non-profit organizations, the Montgomery County Redevelopment Authority, the Community Action Development Commission (CADCOM), Your Way Home Montgomery County and the Montgomery County Opportunities Industrialization Center.

Consolidated Plan Public Contact Information

Emma Hertz, Administrator

Montgomery County Department of Housing and Community Development
AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The County of Montgomery has prepared its Annual Action Plan for 2016 in order to strategically implement federal programs that fund housing, community development and economic development activities within the County. Through a collaborative planning process that involved a broad range of public and private agencies, the County developed an application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME). The County will submit this Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD) by August 12, 2016.

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 (91.215(l))

The Department of Housing and Community Development (DHCD) is responsible for the coordination of various activities required in the administration of grant programs under its purview. To ensure that service delivery coordination is continued, it is essential that each agency share data, exchange information and consult and coordinate with each of the other service providers. The County’s primary means of connecting and networking with housing and service providers in the region is as follows:

- The County utilizes Community Connections, an innovative approach to provide social services to residents in four regions of the County. The Navicates services are the first of a series of Community Connections initiatives that have changed the way in which Montgomery County serves our communities as it relates to human services, building a stronger partnership between government and community organizations.
- Montgomery County Department of Behavioral Health and Developmental Disabilities (BH/DD) provides funding for the development of permanent housing opportunities for individuals who experience mental illness and are of low income. This project is administered jointly with the Montgomery County Department of Housing and Community Development. Projects will be considered if they add to the affordable housing stock for persons who experience mental illness.

This Department has an array of supportive services that work with individuals to support their health and wellness as they become more active members of the communities in which they work and live. The Department will provide technical assistance and create liaisons between the housing developers and local supportive service providers.
In 2014, the Department of Housing and Community Development (DHCD) established a new program, Your Way Home (YWH) Montgomery County, funded with Affordable Housing Trust funds. Your Way Home Montgomery county is a new and more effective system for preventing and ending Homelessness. Montgomery County residents experiencing a housing crisis will simply contact the YWH call center, a toll-free hotline for screening and referral to three newly formed community-based Housing Resource Centers (HRC). HRCs serve as central locations for coordinated housing crisis response for families and individuals in each major region of Montgomery county, connecting residents with needed resources, support and community connections to secure permanent housing and remain stably housed.

HRCs use a progressive engagement strategy, a nationally recognized best practice in addressing homelessness, to provide customized levels of assistance to families and to reserve the most expensive interventions for residents with the most severe barriers to housing success.

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.

Since 1995, the U.S. Department of Housing and Urban Development (HUD) has required that all homeless housing and service providers in a jurisdiction that seek federal funding work together in a single planning body called the Continuum of Care (CoC). The CoC establishes goals, objectives, action steps and coordinates planning for the full range of homeless services including prevention, as well as emergency, transitional and permanent supportive housing.

Representatives of local and county government, non-profit homeless and housing providers and for-profit organizations have been meeting together on a monthly basis since 1999 to address the issue of homelessness. In addition, the Montgomery County Office of Housing and Community Development and the Office of Behavioral Health/Developmental Disabilities are also active members of the CoC and provide it with staff and financial support. The Office of Housing and Community Development is the lead entity for the committee.

The Continuum of Care committee monitors the County Ten Year Plan to End Homelessness and evaluates the County’s homeless system to identify gaps and strategies for filling those gaps; focuses on creating new permanent supportive housing for homeless persons with disabilities; educates coalition and community members about homeless needs and issues; assesses services and develops strategies to address gaps; and reviews unmet need and project performance, and determines the ranking of projects for HUD funding.

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 Montgomery County Department of Housing and Community Development is the CoC lead agency for PA-504/Montgomery County/Lower Merion/Norristown/Abington Continuum of Care. The Montgomery County DHCD administers the ESG funds throughout the County. Montgomery County, through the Your Way Home program, develops the County plan intended to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.

The County of Montgomery’s written standards for the application and allocation process are included in the Application attachment in the Citizen Participation Appendix. The County of Montgomery, through its Department of Housing and Community Development, announces the availability of Community Development Block Grant Program (CDBG) funds, HOME funds and ESG funds. Funds are awarded through an application process. Applications for funding can be submitted by: 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) homeless shelters and 5) private developers.

County Housing and Community Development staff reviews each project proposal as it relates to federal and county eligibility criteria and fundability criteria. Prior to the actual review a preliminary screening of the application will take place testing for completeness. Staff will assess how the application will meet the goals of the County’s Five-Year Consolidated Plan and how the project will accomplish those goals. Upon selection, all recipients will be notified of the grant amount after October 1, 2016 following federal acceptance. All program participants will be required to execute a Subrecipient Agreement with Montgomery County. Specific instructions on how to begin implementation of the project are provided at an orientation meeting prior to the start of the project. No costs incurred prior to the execution of the Grant Agreement and Notice of Environmental clearance will be reimbursed by the County Community Development Program. Any costs incurred and paid for prior to proper notification of clearance can jeopardize the use of funds on the project.

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

Annual Action Plan
2016
Table 2 – Agencies, groups, organizations who participated

<table>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>Montgomery County Housing Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>PHA</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment Public Housing Needs</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>2</td>
<td>Agency/Group/Organization</td>
<td>FAMILY SERVICES OF MONTGOMERY COUNTY</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Non-Homeless Special Needs</td>
</tr>
<tr>
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</tr>
<tr>
<td>3</td>
<td>Agency/Group/Organization</td>
<td>Indian Creek Foundation</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment Public Housing Needs</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Keystone Opportunity Center</td>
<td></td>
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<td></td>
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<tr>
<td>Agency/Group/Organization Type</td>
<td>Food Pantry</td>
<td></td>
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<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Homeless Needs - Chronically homeless Non-Homeless Special Needs</td>
<td></td>
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<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>INTER-FAITH HOUSING ALLIANCE</th>
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<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
</tr>
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<tr>
<th>Agency/Group/Organization</th>
<th>Pottstown Borough</th>
</tr>
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<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Other government - Local</td>
</tr>
</tbody>
</table>
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Non-Homeless Special Needs  
Economic Development |
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</tr>
</tbody>
</table>

| 7 | Agency/Group/Organization | The Salvation Army |
|--------------------------------|---------------------------------------------------------------|
| Agency/Group/Organization Type | Services - Housing  
Services-Children  
Services-Elderly Persons  
Services-Persons with Disabilities  
Services-Persons with HIV/AIDS  
Services-homeless  
Services-Health  
Services-Education |
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Homeless Needs - Families with children  
Homelessness Strategy  
Non-Homeless Special Needs  
Anti-poverty Strategy |
<p>| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities. |</p>
<table>
<thead>
<tr>
<th>8</th>
<th>Agency/Group/Organization</th>
<th>YWCA</th>
</tr>
</thead>
</table>
|   | Agency/Group/Organization Type | Services-Children  
|   |     | Services-Elderly Persons  
|   |     | Services-Persons with Disabilities  
|   |     | Services-Health  
|   |     | Services-Education  |
| 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 County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities. |

<table>
<thead>
<tr>
<th>9</th>
<th>Agency/Group/Organization</th>
<th>HEDWIG HOUSE INC.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-Persons with Disabilities</td>
</tr>
</tbody>
</table>
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
|     | 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 County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities. |

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<thead>
<tr>
<th>10</th>
<th>Agency/Group/Organization</th>
<th>Mosaic Community Land Trust</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
<td></td>
</tr>
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<td></td>
</tr>
</tbody>
</table>

| 11 | Agency/Group/Organization | RHD Coordinated Homeless Outreach Center |
|--------------------------------|----------------------------------------|
| Agency/Group/Organization Type | Services-homeless |
| What section of the Plan was addressed by Consultation? | Homelessness Strategy |
| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities. |

| 12 | Agency/Group/Organization | WILLOW GROVE COMMUNITY DEVELOPMENT CORPORATION |
|--------------------------------|-----------------------------------------------|
| Agency/Group/Organization Type | Housing |
| What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The County held four public hearings to seek input into the Annual Action Plan. The County also solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provides a current assessment of needs and opportunities. |
Identify any Agency Types not consulted and provide rationale for not consulting

The County's Citizen Participation Process was designed to be open and encouraging to all Agency Types. There were no Agency Types that were not consulted during the Consolidated Planning process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Montgomery County CoC</td>
<td>The goals of the Strategic Plan are closely coordinated with the goals of the Continuum of Care. The County of Montgomery is an active participant with the applicant and administering agency for the Continuum of Care.</td>
</tr>
<tr>
<td>PHA 5 Year Plan</td>
<td>Montgomery County Housing Authority</td>
<td>The Goals of the County Housing Authority's Five Year Plan are closely coordinated with the goals of providing affordable housing for the County.</td>
</tr>
<tr>
<td>Montgomery County Analysis of Impediments</td>
<td>Montgomery County</td>
<td>DHCD staff were actively involved in the development and update of the County’s AI. Actions to address impediments identified in the AI are incorporated in the Action Plan and CAPERs.</td>
</tr>
<tr>
<td>Montco 2014: A Shared Vision</td>
<td>Montgomery County Planning Commission</td>
<td>A Comprehensive Plan for Montgomery County developed to encourage collaboration and partnerships among governments, businesses, institutions, schools, higher education and other stakeholders.</td>
</tr>
<tr>
<td>Montgomery County 10-Year Plan to End Homelessness</td>
<td>Montgomery County CoC</td>
<td>This comprehensive document outlines the County's priority goals to eliminate homelessness and establishes strategies to realize them, in coordination with the Continuum of Care and the Five Year Consolidated Plan Goals.</td>
</tr>
<tr>
<td>Your Way Home</td>
<td>Strategic Plan 2013-2015</td>
<td>Your Way Home Montgomery County is a transformational partnership between government, philanthropy and nonprofits to solve the problem of homelessness in the County.</td>
</tr>
</tbody>
</table>

Table 3 - Other local / regional / federal planning efforts

Annual Action Plan 2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Narrative (optional)
AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

In accordance with 24 CFR 91.115(e), Montgomery County has adopted a Citizen Participation Plan describing the citizen participation requirements of its Federal programs. The full Citizen Participation Plan is on file at the Department of Housing and Community Development. Evidence of citizen participation is included in the Citizen Participation Appendix.

The County provided training workshops on March 1 and 3, 2016 for local government entities and non-profits wishing to apply for funds. Initial citizen participation meetings were held as follows:

March 8, 2016 at 6:00 p.m. - Pottstown, PA
March 9, 2016 at 6:00 p.m. - Willow Grove, PA
March 10, 2016 at 6:00 p.m. - Norristown, PA

A draft of the Annual Action Plan for FY 2016 was placed on public display for 30 days beginning June 13, 2016 and ending July 13, 2016. The display notice was published in several area newspapers of record:

- Intelligencer, Doylestown
- The Mercury, Pottstown
- The Reporter, Lansdale
- The Times Herald, Norristown

A public hearing was held on July 19, 2016 to receive citizen comment on the proposed Action Plan. In addition to public input from community meetings and comments broadly solicited, the County invited input from other governmental agencies and nonprofits. Announcement of the availability of the plan was sent to organizations that represent persons with limited English speaking ability, disabilities and low incomes.
In order to reach and provide adequate access to each of the categories of residents the County publicizes notice of upcoming events related to the development and implementation of the Action Plan, including sufficient information about the event subject matter, at least two weeks prior to each event. Events are advertised through the minimum of one of the following methods, depending on event type:

- Non-legal section of those newspapers with general circulation within the County - a Notice of Hearing (for Public Hearings)
- Letters to individual citizens, groups, etc.
- DHCD mailing list and website

All events are held at times and locations convenient to potential and actual beneficiaries. All public hearings will be held in various locations throughout the County. Hearings are held in the evenings or on weekends in order to allow for greater participation. When a "reasonable" amount of non-English speaking citizens are expected to participate, their needs are met by the provision of an appropriate translator. All public hearings are handicap accessible.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>The County conducted three public meetings to solicit input into the preparation of the Action Plan. The meetings were advertised and held as follows: March 8, 2016 at 6:00 pm Pottstown, PA, March 9, 2016 at 6:00 pm Willow Grove, PA, March 10, 2016 at 6:00 pm Norristown, PA</td>
<td>No comments were received.</td>
<td>No comments were received.</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>2</td>
<td>Training Meetings</td>
<td>Grant Applicants</td>
<td>On March 1, 2016, the County facilitated a Training Session in the HSC Community Room for Non-profit applicants for CDBG/ESG/HAP from 9:00 to 12:00 and HOME/CHDO from 1:30 to 3:00. On March 3, 2016, the County facilitated a Training Session in the HSC Community Room for Municipal applicants for CDBG from 1:00 to 4:00, including Fair Housing Training.</td>
<td>No comments were received at the training sessions. Comments of the training materials and the program applications are included in the Grantee Unique Appendix.</td>
<td>All comments were received.</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>3</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>On July 19, 2016, a public hearing will be held on the 2016 Annual Action Plan at 6:00 p.m. at the Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA. Interested parties may attend the hearing and present their comments on the Draft Plan.</td>
<td>The County received 2 comments and one request for reconsideration during the public hearing: 1. Commissioner Gale expressing his concerns about the overall project costs of the North Hills Manor Reconstruction Project in Glenside Proposed funding through the HOME Program and Affordable Housing Trust Fund. 2. A second comment was received from a County resident expressing concerns about the new HUD Final Rule on Affirmatively Furthering Fair Housing (AFFH) that went into effect in July 2015. Third was an appeal for reconsideration from the Borough Manager of Lansdale request that there CDBG Lansdale Project be reconsidered for funding in this Action Plan.</td>
<td>All comments were accepted.</td>
<td></td>
</tr>
</tbody>
</table>
Table 4 – Citizen Participation Outreach
Expected Resources

AP-15 Expected Resources – 91.220(c) (1, 2)

Introduction

The County of Montgomery anticipates receiving Community Development Block Grant, Emergency Solutions Grant, and HOME Investment Partnerships Program funds, available from HUD, during the five year period of the 2015-2019 Consolidated Plan.

Priority Table

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Reminder of ConPlan</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
<td>Prior Year Resources: $</td>
</tr>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>2,939,635</td>
<td>0</td>
<td>119,833</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Expected Amount Available Reminder of ConPlan</td>
<td>Narrative Description</td>
</tr>
<tr>
<td>---------</td>
<td>-----------------</td>
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<td>-----------------------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Prior Year Resources: $</td>
<td>Total: $</td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition</td>
<td>924,978</td>
<td>0</td>
<td>218,317</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homebuyer assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homeowner rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental new construction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>New construction for ownership</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>TBRA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing</td>
<td>264,975</td>
<td>60</td>
<td>265,035</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Financial Assistance</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Overnight shelter</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Rapid re-housing (rental assistance)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rental Assistance Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Transitional housing</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Table 5 - Expected Resources – Priority Table*

**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 following private, state, and local funds are anticipated to leverage Federal Funds:

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Montgomery County Affordable Housing Trust Funds (AHTF). The Pennsylvania Optional County Affordable Housing Funds Act of 1992 (the Act) allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds for recording deeds and mortgages. As of 2014 the County raised the fee from $13 to $26 per document. 85 percent of the revenues are to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure HUD HOME funds, construction or rehabilitation financing, housing related services, match for other State or federal funds, rapid-rehousing, homelessness prevention, and supporting first-time homebuyer second mortgage programs.

Homeowners Emergency Mortgage Assistance Program (HEMAP) is available through the Pennsylvania Housing Finance Agency (PHFA). HEMAP provides loans to help bring delinquent mortgage payments current. Households may be eligible for continuing monthly payment assistance. Total assistance cannot exceed 24 monthly payments or $60,000. HEMAP assistance is available in Montgomery County through CADCOM.

The State, through PHFA uses a portion of its qualified mortgage bond issuing authority for the purpose of issuing Mortgage Credit Certificates (MCC) to qualified first-time homebuyers State-wide. A MCC entitles the certificate holder to take a credit against his federal income taxes in an amount equal to an authorized percentage of the annual interest paid on the certificate holder’s mortgage, subject to limitations. The issuance of MCC is governed by the provisions of the US Internal Revenue Code, (the Code) as amended and applicable regulations issued from time to time under (the Regulations).

In addition, as permitted by local and state codes and the regulations, the MCC program may contain locally imposed criteria for eligibility and administration. PHFA’s Homeowner’s Equity Recovery Opportunity Loan (HERO) Program is a loan program designed to improve the financial situation of Pennsylvanians who are not able to afford their current mortgage payments. The HERO program provides for up to 100 percent financing but, instead of refinancing your current mortgage into a new loan, PHFA purchases your loan directly from your current lender and then sets you up on an affordable repayment agreement. This program is for borrowers not eligible for PHFA’s REAL program (Refinance to an Affordable Loan) or another mortgage refinance product available in the general market due to credit issues or owing more than your home’s current appraised value. Funding for the HERO program is limited. Loans are reviewed by PHFA on a case-by-case basis as funding levels permit.

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

There is no publically owned land or property owned by the County of Montgomery designated to be used to address the needs identified in the plan.

Discussion

The Delaware Valley Housing Partnership (DVHP) Mortgage Program is a collaborative mortgage lending program, initiated and operated by lenders to increase home ownership among low and moderate income households in the greater Philadelphia area. Participating lenders flexibly underwrite mortgages on low-cost houses with peer oversight. The program is administered by the Greater Philadelphia Urban Affairs Coalition.

Private financial institutions in Montgomery County participating in the County's first-time homebuyer program include Citizens Bank, PNC Mortgage Corporation, Hatboro Federal Savings, Harleysville National Bank, Univest Corporation, and Cardinal Financial Corporation. The County provides closing cost and/or down payment assistance to eligible program participants, and works in conjunction with the participants in securing mortgage financing from the private sources. The financial institutions hold loans in their mortgage portfolio.

Delaware Valley Community Reinvestment Fund is a regional community development financial institution dedicated to building wealth and opportunity for low wealth communities and low- and moderate-income individuals. The Reinvestment Fund accomplishes its mission in four ways:

1) by functioning as an intermediary between investors who share its mission and borrowers whose projects and businesses reduce poverty;
2) by functioning as a lender, investor, and grantor for housing, small business, community service, work force development, commercial real estate, and energy conservation projects;
3) by functioning as a source of information, education, technical advice, and systems building for public, civic, and private sector institution; and
4) by advancing policy ideas designed to reduce urban and suburban poverty and build a sustainable and competitive region.
# Annual Goals and Objectives

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

## Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rehabilitation &amp; Preservation of Housing Stock</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Rehabilitation of The Current Housing Stock</td>
<td>CDBG: $250,000</td>
<td>Homeowner Housing Rehilitated: 10 Household Housing Unit</td>
</tr>
<tr>
<td>2</td>
<td>Create New Affordable Rental Housing</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Expand Rental Housing Stock</td>
<td>HOME: $824,011</td>
<td>Rental units constructed: 115 Household Housing Unit</td>
</tr>
<tr>
<td>4</td>
<td>Provide Tenant-Based Rental Assistance</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Strategic Use of Tenant-Based Rental Vouchers</td>
<td>HOME: $226,787</td>
<td>Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted</td>
</tr>
<tr>
<td>6</td>
<td>Public Facility &amp; Infrastructure Improvements</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>County-wide</td>
<td>Non-Housing Community Development Needs</td>
<td>CDBG: $1,881,120</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15432 Persons Assisted</td>
</tr>
<tr>
<td>Sort Order</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Geographic Area</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
</tr>
<tr>
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</tr>
<tr>
<td>7</td>
<td>Support Vital Public Services</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>County-wide</td>
<td>Non-Housing Community Development Needs</td>
<td>CDBG: $55,000</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 129 Persons Assisted</td>
</tr>
<tr>
<td>9</td>
<td>Support Planning &amp; Administration</td>
<td>2015</td>
<td>2019</td>
<td>Planning and Administration</td>
<td>County-wide</td>
<td>Planning and Administration</td>
<td>CDBG: $542,083 HOME: $92,498 ESG: $19,873</td>
<td>Other: 1 Other</td>
</tr>
</tbody>
</table>

Table 6 – Goals Summary

Goal Descriptions
<table>
<thead>
<tr>
<th>Goal Name</th>
<th>Rehabilitation &amp; Preservation of Housing Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal Description</td>
<td>Rehabilitation of the current housing stock. The County will continue to support housing rehabilitation programs, such as the county-wide homeowner rehabilitation program, and rehabilitation of the affordable rental housing stock. In addition, the County supports the efforts of nonprofits and other organizations to provide weatherization and lead-based paint hazard control, accessibility improvements, and housing repair programs. Promote the rehabilitation and preservation of the existing affordable housing stock (homeowner and rental) through partnerships with agencies that provide housing rehabilitation assistance. Support initiatives by local organizations and municipal sponsors to provide rehabilitation, energy efficiency/weatherization, accessibility modifications and lead-based paint hazard control.</td>
</tr>
<tr>
<td>Project #8 - Housing Rehab $250,000 - 10 houses</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Goal Name</th>
<th>Create New Affordable Rental Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal Description</td>
<td>The County will continue to support new housing construction of rental units. To address unmet or overburdened needs, the County encourages projects that include the following: those that provide project based rental assistance; those serving the lowest income households; set-asides for disabled households; and units with supportive services for seniors 65 and over. Creation of new affordable rental housing for households below 80% of the area median income. The 2016 year objectives is to collaborate with developers to develop at least 66 units of affordable rental housing.</td>
</tr>
<tr>
<td>Project #11 - New Rental Housing - Home funds $325,000 - 11 units</td>
<td></td>
</tr>
<tr>
<td>Project #12 - New Rental Housing - Home funds $275,000 - 11 units</td>
<td></td>
</tr>
<tr>
<td>Project #13 - Rehabilitation of Rental Housing - HOME funds $44,010.20 - 3 units</td>
<td></td>
</tr>
<tr>
<td>Project #14 - New Rental Housing - Home funds $150,000 - 1 units</td>
<td></td>
</tr>
<tr>
<td>CHDO Operating Costs - $30,000</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Goal Name</td>
</tr>
<tr>
<td>---</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>4</td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td>5</td>
<td>Homeless Prevention &amp; Support Activities</td>
</tr>
<tr>
<td>6</td>
<td>Goal Name</td>
</tr>
<tr>
<td>---</td>
<td>-----------</td>
</tr>
<tr>
<td></td>
<td>Goal Description</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7</th>
<th>Goal Name</th>
<th>Support Vital Public Services</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>There are varied public services available in the community to address service needs. There continue to be service needs that are important to the long-term ability of persons to sustain themselves and in support of their health and safety. Within the county, there is a network of social service agencies that provide service and training for senior citizens, youth, disabled persons, battered spouses, and abused children. The County will prioritize public services dollars available to those areas when significant gaps are identified.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9</th>
<th>Goal Name</th>
<th>Support Planning &amp; Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>Support planning and administration of community development. On-going planning is needed to ensure efficiency in administration of programs, coordination of resources, and proper management in agreement with regulations.</td>
</tr>
</tbody>
</table>

Table 7 - Goal Descriptions
Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

Montgomery has several planned HOME projects for FY 2016 that will create affordable rental units. Below is the breakdown of proposed units by income.

Extremely low income - 3 units

Low income - 61 units

Moderate income - 2 units

Susie Clemens 6 units @ 20 % and 9 units at 50%

North Hills (50 units) 11 units are HOME 3 units @ 30%

In addition to the above HOME funded units, Montgomery County will invest in additional affordable housing utilizing Affordable Housing Trust Funds.
AP-35 Projects – 91.220(d)

Introduction

With input from a variety of stakeholders, with data from a variety of sources, including the Montco 2040: A Shared Vision report, and with hands-on experience in front-line services to the most vulnerable populations in the County, Montgomery plans a mix of activities in FY 2016 to address a wide range of challenges for those populations. Infrastructure improvements, housing rehab, recreation facilities and programming and support for area business are just some of the approaches to improving neighborhoods, houses and, most importantly, families in the County.

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>MONTCO CDBG/HOME/ESG Planning &amp; Admin</td>
</tr>
<tr>
<td>2</td>
<td>MONTCO CDBG Street Improvements Project</td>
</tr>
<tr>
<td>3</td>
<td>MONTCO CDBG Sidewalk Improvements Project</td>
</tr>
<tr>
<td>4</td>
<td>MONTCO CDBG Water/Sewer Improvements Projects</td>
</tr>
<tr>
<td>5</td>
<td>MONTCO CDBG Public Facility Improvements Project</td>
</tr>
<tr>
<td>6</td>
<td>MONTCO CDBG Public Services</td>
</tr>
<tr>
<td>7</td>
<td>MONTCO CDBG Homeless Support and Prevention</td>
</tr>
<tr>
<td>8</td>
<td>MONTCO CDBG Housing Rehab</td>
</tr>
<tr>
<td>9</td>
<td>HESG 2016</td>
</tr>
<tr>
<td>10</td>
<td>HOME Genesis Housing Corporation CHDO Operating</td>
</tr>
<tr>
<td>11</td>
<td>HOME North Hills Manor</td>
</tr>
<tr>
<td>12</td>
<td>HOME Advanced Living</td>
</tr>
<tr>
<td>13</td>
<td>HOME Resources for Human Development</td>
</tr>
<tr>
<td>14</td>
<td>HOME Genesis Housing Corporation</td>
</tr>
<tr>
<td>15</td>
<td>HOME Hedwig House TBRA</td>
</tr>
<tr>
<td>16</td>
<td>HOME Valley Youth House Committee, Inc. TBRA</td>
</tr>
</tbody>
</table>

Table 8 – Project Information

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

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. Montgomery County partners with public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting underserved needs include:

- Increased need for affordable housing and supportive services resulting from economic downturn – while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and
• Increased foreclosures & unemployment – in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure rate, the associated problem of poor credit, and rising unemployment.

As demonstrated in the preceding sections, the County administers and supports a wide array of programs to expand housing choice and provide shelter and services. The Urban County’s FY 2016 allocations address obstacles of affordability and availability of housing and homeownership financing, opening more opportunities for lower-income households. However, obstacles such as the high cost of housing in Montgomery County being prohibitive to a large number of working poor families will remain due to the scale of these problems and the limited resources available for their resolution.
## Projects

### AP-38 Projects Summary

#### Project Summary Information

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>MONTCO CDBG/HOME/ESG Planning &amp; Admin</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td></td>
<td>Goals Supported</td>
<td>Support Planning &amp; Administration</td>
</tr>
<tr>
<td></td>
<td>Needs Addressed</td>
<td>Planning and Administration</td>
</tr>
<tr>
<td></td>
<td>Funding</td>
<td>CDBG: $542,083 HOME: $92,498 ESG: $19,873</td>
</tr>
<tr>
<td></td>
<td>Description</td>
<td>1. Housing Equality Center $52,083 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers, housing agencies that serve the protected classes. Office located at 455 Maryland Drive, Suite 190, Fort Washington. 2. Housing &amp; Community Development - Administration $490,000 3. ESG Administration - $19,8734. HOME Administration - $92,498</td>
</tr>
<tr>
<td></td>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td></td>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>
| Location Description | 1. Housing Equality Center - office located at 455 Maryland Drive, Suite 190, Fort Washington, PA 19034  
2. Housing & Community Development - Administration, Montgomery County Offices  
3. ESG Administration - Montgomery County Offices  
4. HOME Administration - Montgomery County Offices |
|---|---|
| Planned Activities | 1. Housing Equality Center $52,083 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers, housing agencies that serve the protected classes. Office located at 455 Maryland Drive, Suite 190, Fort Washington  
2. Housing & Community Development - Administration $490,000  
3. ESG Administration - $19,873  
4. HOME Administration - $92,498 |
| Project Name | MONTCO CDBG Street Improvements Project |
| Target Area | County-wide Low Mod Block Group |
| Goals Supported | Public Facility & Infrastructure Improvements |
| Needs Addressed | Non-Housing Community Development Needs |
| Funding | CDBG: $532,920 |
| Description | 1. Bridgeport Borough Street Improvements $180,000 - Reconstruction of 5,000 linear feet of borough streets [11 streets: Grove (1400LF), Bush (2700LF), 5th (400LF), 6th (500LF), 7th (400LF), 8th (700LF), Union (1700LF), Hurst (2200LF), Coates (1100LF), Apple Alley (225LF), and Cherry Alley (225LF)].  
2. Royersford Borough Church Street Road Improvements $148,000 - Mill and overlay 720 linear feet, full width, of Church Street from 5th Avenue to 6th Avenue. In addition, 16 ADA accessible curb ramps and associated crosswalks will be installed at the 5th and 6th Avenue intersections.  
3. Pennsburg Borough 2nd Street Improvements Phase III $204,920 - Total reconstruction of the roadway for an approximate length of 830 linear feet, replacing existing sidewalk and curbing and installing sidewalk and curbing where none currently exists. Curb depressions and ramps that are ADA compliant. Work will extend on 2nd Street from just north of Shirley Lane to Seminary Street. |
| Target Date | 9/30/2017 |
| Estimate the number and type of families that will benefit from the proposed activities | Bridgeport Borough Street Improvements - Census Tract 2057, Block Group 2,3,4,5; Tract 2058.16, Block Group 1,2; low/mod 2735  
Royersford Borough Church Street Road Improvements - Census Tract 2062.01, Block Group 2, 53.25% Low/Mod, 860 persons  
Pennsburg Borough W 2nd Street Improvements Phase III - Census Tract 2080, Block Group 2, 47.57% Low/Mod, 685 persons |
| Location Description | 1. Bridgeport Borough Street Improvements - reconstruction of 5,000 LF of roadways, including curb and base repair in various residential locations throughout the Borough.  
2. Royersford Borough - Church Street roadway surface between 5th Avenue to 6th Avenue.  
3. Pennsburg Borough - reconstruction of 830 linear feet on W 2nd Street, including curb, base repair and sidewalk between Shirley Lane and Seminary Street. |
<p>| Planned Activities | See above project description.  |
| 3 | Project Name | MONTCO CDBG Sidewalk Improvements Project  |
| Target Area | County-wide Low Mod Block Group  |
| Goals Supported | Public Facility &amp; Infrastructure Improvements  |
| Needs Addressed | Non-Housing Community Development Needs  |
| Funding | CDBG: $638,850  |</p>
<table>
<thead>
<tr>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>1. Jenkintown Borough - $159,500 - Removal of 42 existing noncompliant concrete curb ramps and designated sections of concrete curb and construction of 64 proposed ADA compliant concrete curb ramps at thirteen street intersections in the Borough. 2. Telford Borough - $207,000 - Construct/reconstruct approximately ninety (90) handicap ramps, associated curb depressions, and truncated dome systems at various intersections, alley locations, and driveway facilities within the SW corner of Telford Borough between Central Avenue and Penn Avenue (Montgomery County portion only). The selected ramp locations currently have non-compliant sidewalk ramp structures or lack ramps entirely. 3. Lower Pottsgrove Township - $82,450 - Reconstruct portions of the existing pedestrian trails that exhibit excessive slopes an/or narrow widths and a portion of the gravel parking lot to comply with federal accessibility standards at the park located at 2100 Buchert Road (at the intersection of Buchert Road and Pleasantview Road). 4. Souderton Borough - $189,900 - Reconstruct existing concrete curb and 5 1/2-feet-wide concrete sidewalk on both the north and south side of Montgomery Avenue for the length of one full block between Fourth Street and Fifth Street. Additionally, appropriately designed curb depressions will be constructed that are ADA compliant.</td>
<td></td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
</tbody>
</table>
| Estimate the number and type of families that will benefit from the proposed activities | 1. Jenkintown Borough - Census Tract 2021, 456 persons below 50% of median  
2. Telford Borough - Census Tract 2073, 186 persons below 50% of median  
3. Lower Pottsgrove Township - Census Tract 2087.04, Block Group 1, 48.54% Low/Mod, 1,245 persons  
4. Souderton Borough - Census Tract 2072.02, Block Group 1, 52.74% Low/Mod, 385 persons |
| Location Description                                                                 | 1. Jenkintown Borough - Removal of 42 existing noncompliant curb ramps and construction of 64 proposed ADA compliant curb ramps at 13 street intersections in the Borough.  
2. Telford Borough - Construct/reconstruct 90 curb ramps within the SW corner of Telford Borough between Central avenue and Penn Avenue (Montgomery County portion only).  
3. Lower Pottsgrove Township - Reconstruct portions of existing pedestrian trails and a portion of gravel parking lot located at 2100 Buchert Road (at the intersection of Buchert Road and Pleasantview Road).  
4. Souderton Borough - Reconstruct existing curb and sidewalk on both the north and south side of Montgomery Avenue between Fourth Street and Fifth Street. |
| Planned Activities                                                                 | See above project description. |
| 4 Project Name                                                                    | MONTO CDBG Water/Sewer Improvements Projects |
| Target Area                                                                       | County-wide Low Mod Block Group |
| Goals Supported                                                                   | Public Facility & Infrastructure Improvements |
| Needs Addressed                                                                   | Non-Housing Community Development Needs |
| Funding                                                                           | CDBG: $537,350 |
| Description | 1. West Pottsgrove Township - $179,650 - Install approximately 321 linear feet of sanitary sewer main related appurtenances, reconstruct School Lane roadway surface between East Race Street and East Vine Street, install four new custom ADA handicap ramps, remove and replace approximately 250 linear feet of damaged concrete curbing, remove and replace approximately 110 square yards of damaged concrete sidewalk, install approximately 186 linear feet of storm sewer pipe and related appurtenances.  
2. Springfield Township - $132,700 - Installation of approximately 805 linear feet of new storm sewer pipe, 8 new storm sewer inlets, and one modified concrete end wall, along with associated pavement, curb and land restoration activities.  
3. Pottstown Borough - $225,000 - Construct a new stormwater system to replace the existing system, to convey stormwater from Laurel to Washington Street and connect into the Industrial Highway stormwater system, construct new valve chamber with a Duck Bill Check Value to prevent back flow. |
<table>
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</thead>
<tbody>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
</tbody>
</table>
| Estimate the number and type of families that will benefit from the proposed activities | 1. West Pottsgrove Township - Census Tract 2092.02, Block Group 1, 44.96% Low/Mod, 580 persons.  
2. Springfield Township - Census Tract 2104, Block Group 2, 42.96% Low/Mod, 290 persons.  
3. Pottstown Borough - Census Tract 2088.02, Block Group 2; Tract 2088.01, Block Group 1; Low/Mod persons 1,915. |
| Location Description | 1. West Pottsgrove Township - installation of 321 linear feet of sanitary sewer main on School Lane between East Race Street and East Vine Street.  
2. Springfield Township - installation of 805 linear feet of new storm sewer pipe on Brookside Road between Bethlehem Pike and the end cul-de-sac.  
3. Pottstown Borough - new stormwater system from Laurel and Washington Streets to Industrial Highway |
<p>| Planned Activities | See above project description. |
| Project Name | MONTCO CDBG Public Facility Improvements Project |
| Target Area | County-wide Low Mod Block Group |</p>
<table>
<thead>
<tr>
<th>Goals Supported</th>
<th>Public Facility &amp; Infrastructure Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Needs Addressed</td>
<td>Non-Housing Community Development Needs</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $172,000</td>
</tr>
<tr>
<td>Description</td>
<td>1. Cheltenham Township - $172,000 - Rehabilitation of the LaMott Community Center building to include insulating the ceilings in the gymnasium and auditorium to reduce energy loss; installing an air conditioning system in the gymnasium; replacing the existing spindles in the front entrance railings with sturdier material; renovating the restrooms to improve energy efficiency and aesthetics; and replacing an antiquated piece of play apparatus at the playground to improve safety. The Community Center is located at 7402 Sycamore Avenue in the LaMott neighborhood of Cheltenham Township.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Cheltenham Township LaMott Community Center: Census Tract 2024.01, Block Groups 1 and 2. Service Area 57.98% Low Mod, 5,140 people. And Census Tract 2024.02, Block Groups 4 and 5.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Cheltenham Township LaMott Community Center, 7402 Sycamore Avenue</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>MONTCO CDBG Public Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Support Vital Public Services</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Non-Housing Community Development Needs</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $55,000</td>
</tr>
<tr>
<td>Description</td>
<td>1. Keystone Opportunity Center - Case Management $25,000 - Salaries for case management services as part of a Day Center for a shelter program estimated to assist 40 homeless clients. The Day Center is located at 177 S Front Street, Souderton, PA. Overnight facilities will be donated each month by a different congregation (11 locations). Program is administered from offices located at 104 N, Main Street, Souderton. 2. Upper Dublin Education Foundation - North Hills Education &amp; Recreation Program $30,000 - After school program for grades 1-12, summer day camp to very low-income students ages 6-12 and teen enrichment program for teens aged 13-19 in the North Hills section of Upper Dublin. Approximately 89 students at the North Hills Learning Center at 212 Girard Avenue, North Hills, PA. The program is administered by the Upper Dublin Education Foundation with offices at 1580 Fort Washington Ave, Maple Glen.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Keystone Opportunity Center Emergency Shelter - clients served 40 Upper Dublin Education Foundation - clients served 89</td>
</tr>
<tr>
<td>Location Description</td>
<td>1. Keystone Opportunity Center Emergency Shelter - Essential Services Center located at 177 S Front Street, Souderton, PA. Overnight facilities will be donated each month by a different congregation (11 locations). 2. Upper Dublin Education Foundation - North Hills Education &amp; Recreation Program North Hills Learning Center at 212 Girard Avenue, North Hills, PA.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
<tr>
<td>Project Name</td>
<td>MONTCO CDBG Homeless Support and Prevention</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Homeless Prevention &amp; Support Activities</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $331,265</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
</tbody>
</table>
| Description | 1. Salvation Army Norristown - Shelter Operations - $70,000 - Shelter operations for 24/7 emergency shelter to homeless families throughout Montgomery County. Shelter serves seven families at a time as well as Code Blue clients. Clients to be served: approx. 224. Office is located at 533 Swede St, Norristown.  
2. Salvation Army Pottstown - Shelter Operations - $100,000 - Shelter operations for Lessig-Booth Family Residences. Services for 24/7 emergency shelter to homeless families throughout Montgomery County. The shelter serves 11 families at a time as well as Code Blue clients. Clients served: 275. Office is located at 137 King Street, Pottstown.  
3. Resources for Human Development - Shelter Operations - $72,000 - Funding will support the shelter food costs ($118,896) and Operations/staff ($66,850) at a low demand homeless shelter for single men and women. The shelter provides 50 beds and can provide 15 Code Blue and 20 over-flow emergency shelter beds when needed. The Coordinated Homeless Outreach Center (CHOC) is located at Building 53 on the Norristown State Hospital grounds and administered by Resources for Human Development is located at 4700 Wissahickon Avenue, Suite 126, Philadelphia, PA 19144. Clients served: 390.  
4. Keystone Opportunity Center - Shelter Operations $40,000 - Staff wages ($53,344), utilities costs ($7,034) and operation expenses for an agency that will provide up to two years of transitional housing services for homeless families and single women in nine scattered site units. Supportive services will be provided to approximately 20 clients. Program is administered from offices located at 104 N. Main Street, Souderton.  
5. Laurel House - Shelter Operations $49,265 - Wages and employer-paid taxes for staff positions (Shelter Manager, Full-time and Part-time Counselor Advocates and Senior Director of Housing) and utilities that provide services for an emergency shelter for victims of domestic violence and their families. These positions manage and provide day to day operations of the shelter where clients receive temporary housing, counseling, legal advocacy and assistance in securing safe transitional/permanent housing upon exit. The program will serve approximately 200 individuals at the shelter. Administrative office is located at 605 Swede Street, Norristown. |
<p>| Target Date | 9/30/2017 |</p>
<table>
<thead>
<tr>
<th>Estimate the number and type of families that will benefit from the proposed activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Salvation Army Norristown - clients served 224</td>
</tr>
<tr>
<td>2. Salvation Army Pottstown - clients served 275</td>
</tr>
<tr>
<td>3. Resources for Human Development - clients served 390</td>
</tr>
<tr>
<td>4. Keystone Opportunity Center - clients served 20</td>
</tr>
<tr>
<td>5. Laurel House - clients served 200</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Salvation Army Norristown Shelter Operations/Code Blue Office is located at 533 Swede Street, Norristown, PA 19401.</td>
</tr>
<tr>
<td>2. Salvation Army Pottstown Shelter Operations/Code Blue Office is located at 137 King Street, Pottstown, PA 19464.</td>
</tr>
<tr>
<td>3. Resources for Human Development Shelter Operations - The Coordinated Homeless Outreach Center (CHOC) is located at Building 53 on the Norristown State Hospital grounds and administered by Resources for Human Development located at 4700 Wissahickon Avenue, Suite 126, Philadelphia, PA 19144.</td>
</tr>
<tr>
<td>4. Keystone Opportunity Center (KOC) Transitional Housing Operations is located at 104 N. Main Street, Souderton, PA.</td>
</tr>
<tr>
<td>5. Laurel House Shelter Operations is located at 605 Swede Street, Norristown, PA.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planned Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>See above project description.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
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</thead>
<tbody>
<tr>
<td>MONTCO CDBG Housing Rehab</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Target Area</th>
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</thead>
<tbody>
<tr>
<td>County-wide</td>
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</table>

<table>
<thead>
<tr>
<th>Goals Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehabilitation &amp; Preservation of Housing Stock</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Needs Addressed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehabilitation of The Current Housing Stock</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG: $250,000</td>
</tr>
<tr>
<td>Description</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Target Date</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
</tr>
<tr>
<td>Location Description</td>
</tr>
<tr>
<td>Planned Activities</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>HESG 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Homeless Prevention &amp; Support Activities</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td>Funding</td>
<td>ESG: $245,162</td>
</tr>
<tr>
<td>Description</td>
<td>1. Pottstown Cluster of Religious Communities - Rapid Re-Housing and Case Management $245,162 - Funds will support Rapid Re-housing Rental Subsidies ($380,000) and case management services ($314,763.00) to homeless individuals and families referred through the Your Way Home program after a pre-screening process to confirm homelessness. A SPDAT assessment tool will be used to determine priority areas for assistance and establish a housing stability plan. The Housing Stability Coach will provide case management while client is in the program. The program will be run out of offices located at 57 North Franklin, Pottstown but will services the entire Montgomery County.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Pottstown Cluster of Religious Communities (Pottstown HRC) Rapid Rehousing - clients served 125.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Location Description</td>
<td>Pottstown Cluster of Religious Communities (Pottstown HRC) Rapid Rehousing services are provided at an office located at 57 North Franklin Street, Pottstown, PA 19464.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
<tr>
<td>Project Name</td>
<td>HOME Genesis Housing Corporation CHDO Operating</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Create New Affordable Rental Housing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Expand Rental Housing Stock</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $30,000</td>
</tr>
<tr>
<td>Description</td>
<td>Genesis Housing Corporation - CHDO Operational funds for the development of affordable housing for the HOME CHDO activities. Funding will be provided to cover the cost of staff and direct and in-direct costs associated with a CHDO activity.</td>
</tr>
<tr>
<td>Target Date</td>
<td>---</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Genesis Housing Corporation CHDO Operating Costs.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Genesis Housing Corporation CHDO Operating Costs.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
<tr>
<td>Project Name</td>
<td>HOME North Hills Manor</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Create New Affordable Rental Housing</td>
</tr>
<tr>
<td>-------------------------</td>
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</tr>
<tr>
<td>Needs Addressed</td>
<td>Expand Rental Housing Stock</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $325,000</td>
</tr>
<tr>
<td>Description</td>
<td>Funding for the revitalization of North Hill Manor, a 3.03 acre general occupancy public housing development located between Walnut Lane, Logan Avenue and Chelsea Avenue with an address of 300 Linden Avenue, Glenside, Upper Dublin Township. Project will include the complete demolition of all units and the existing community building, and the construction of a new community building and fifty (50) replacement units, of which eight (8) are one bedroom units, twenty-one (21) are two-bedroom units, fifteen (15) are three bedroom units and six (6) are four bedroom units. The Manor is owned by the Montgomery County Housing Authority and will partner with Pennrose Properties as the developer for this project. 11 are HOME units</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Project will include the complete demolition of all units and the existing community building, and the construction of a new community building and fifty (50) replacement units, of which eight (8) are one bedroom units, twenty-one (21) are two-bedroom units, fifteen (15) are three bedroom units and six (6) are four bedroom units.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Public housing development located between Walnut Lane, Logan Avenue and Chelsea Avenue with an address of 300 Linden Avenue, Glenside, PA.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
</tbody>
</table>

**Project Name**

HOME Advanced Living

**Target Area**

County-wide

**Goals Supported**

Create New Affordable Rental Housing

**Needs Addressed**

Expand Rental Housing Stock

**Funding**

HOME: $275,000
<table>
<thead>
<tr>
<th>Description</th>
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<tbody>
<tr>
<td>60 units of affordable rental housing for low income seniors 55 and over. The $375,000 awarded BHDD funds will be used to fund construction of 6 units targeted to Special Needs clients at or below 20% AMI. Another 9 units will be targeted to this population and will utilize Section 811 vouchers to subsidize the 50% AMI rents. Additionally 21 units will be available @ 50% AMI, of which 11 will be counted as HOME Units, and 24 units @ 60% AMI. Therefore, 15 units will be dedicated to clients with special needs and 11 HOME units will be targeted for very low income clients. Work opportunities onsite and in the community may be available through the partnership with the Indian Creek Foundation providing services to the community residents. Project location will be @ 82 Derstine Road Campus, in Hatfield Township, a community with 120 currently occupied units of senior rental housing.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/30/2017</td>
</tr>
</tbody>
</table>

| Estimate the number and type of families that will benefit from the proposed activities |
| 60 units of affordable rental housing for low income seniors 55 and over. The construction of 6 units targeted to Special Needs clients at or below 20% AMI. Another 9 units will be targeted to this population and will utilize Section 811 vouchers to subsidize the 50% AMI rents. Additionally 21 units will be available @ 50% AMI, of which 11 will be counted as HOME Units, and 24 units @ 60% AMI. Therefore, 15 units will be dedicated to clients with special needs and 11 HOME units will be targeted for very low income clients. |

| Location Description |
| Project location will be at 82 Derstine Road Campus in Hatfield Township. |

| Planned Activities |
| See above project description. |

| Project Name |
| HOME Resources for Human Development |

| Target Area |
| County-wide |

| Goals Supported |
| Rehabilitation & Preservation of Housing Stock |

| Needs Addressed |
| Rehabilitation of The Current Housing Stock |

<p>| Funding |
| HOME: $44,010 |</p>
<table>
<thead>
<tr>
<th>Description</th>
<th>Provide funds to renovate a group home located at 2317 Coles Blvd. in East Norriton Township. This home can accommodate three developmentally disabled individuals. Renovations include kitchen rehabilitation to update for space and usability including countertops, cabinets, appliances, flooring and lighting along with basement waterproofing to include trench excavating, two sump pumps, wall restoration and cracked floor repair.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Group home can accommodate three developmentally disabled individuals.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Group home located at 2317 Coles Blvd in East Norriton Township.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
<tr>
<td>Project Name</td>
<td>HOME Genesis Housing Corporation</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Create New Affordable Rental Housing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Expand Rental Housing Stock</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $150,000</td>
</tr>
<tr>
<td>Description</td>
<td>Acquire one property to rehabilitate into affordable rental unit. The property would be acquired outside the Borough of Pottstown. (The property is not identified - Not site specific).</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Acquisition/Rehab/Rental of one property. The property will be located outside Pottstown but within the County.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Locations of properties have not yet been identified.</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------------------------------------------</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above description.</td>
</tr>
<tr>
<td><strong>15</strong> Project Name</td>
<td>HOME Hedwig House TBRA</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $147,437</td>
</tr>
<tr>
<td>Description</td>
<td>Tenant Based Rental assistance for 15 extremely low-income (30% AMI) special needs households that are at risk of being homeless. This application will be used to maintain the rental subsidy for the current 15 households for 12 months.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Tenant Based Rental Assistance for 15 disabled households. Project will assist people under 30% of AMI. At project completion time, documentation on the different levels of income for people assisted will be placed in the project file.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Tenant Based Rental Assistance by Hedwig House - 109 Jenkins Avenue, Lansdale, PA 19446.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
<tr>
<td><strong>16</strong> Project Name</td>
<td>HOME Valley Youth House Committee, Inc. TBRA</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $79,350</td>
</tr>
<tr>
<td>Description</td>
<td>Tenant Based Rental Assistance for up to 15 Transition age 18 to 24 who would be at high-risk of becoming homeless. Targeted youth will be former system-involved and non-system LGTBQ youth that qualify as less than 60% LMI.</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2017</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>Tenant Based Rental Assistance for up to 15 youth aging out of foster care who would be at high-risk of becoming homeless. Project will assist people under 50% of AMI. At project completion time, documentation on the different levels of income for people assisted will be placed in the project file.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Tenant Based Rental Assistance for up to 15 youth aging out of foster care who would be at high-risk of becoming homeless.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>See above project description.</td>
</tr>
</tbody>
</table>

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Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Montgomery County is designated as an Urban County by HUD. As used throughout this document, the term Urban County refers to the area of Montgomery County outside of the Municipality of Norristown and Abington and Lower Merion Townships. These communities receive direct HUD funding and are not part of the funded program area for Montgomery County. Also not included in the Urban County are Conshohocken Borough and Limerick Township, and Marlborough as these municipalities have opted to participate in the State CDBG program.

The following narrative describes the characteristics of the areas in Montgomery County where a majority of low and moderate income persons reside. Because 70% of the County’s CDBG funds must benefit low and moderate income persons, a significant portion of the County’s CDBG funds may be spent in these areas. However, the County is also committed to investing CDBG resources in other non-impacted areas of Montgomery County while continuing to benefit low and moderate income persons.

Based on Census results from 2010 American Community Survey estimates, it is apparent that the Urban County is equally as diverse as the state of Pennsylvania. This is due in part to the increasing diversity amongst the races and ethnicities at both the state and county levels. The percent of Whites in Montgomery County per the 2010 Census was 84%. The percentage of Blacks/African Americans was 9% (up from 6.6% in 2000), Asian/Pacific Islanders 7% (up from 5.7% in 2000), and people of Hispanic origin were 4% (up from 3.6% in 2000).

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>County-wide Low Mod Block Group</td>
<td>62</td>
</tr>
<tr>
<td>County-wide</td>
<td>38</td>
</tr>
</tbody>
</table>

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Each of the activities to be funded in 2016 reflect a High Priority identified in the County's Five Year Plan. Some projects are at specific locations and some of the projects serve a specific geographic area or the entire community. Projects addressing public facility needs and infrastructure needs are at site-specific locations serving low-income areas or benefiting low-income consumers in the area. The map in the Grantee Unique Appendix shows the location of site-specific projects. Where projects serve specific geographic areas, those service areas are noted in AP-35.

HOME funds have been allocated for a variety of projects this year. HOME funds will be used for...
development of affordable rental housing; CHDO Operating funds; and Acquisition/Rehab/Resale of units in various communities. Affordable Housing Trust Funds will be used for activities including: Tenant-based rental assistance will be made available for two special needs populations – elderly who might otherwise be placed in a nursing home or who can be relocated from a nursing home and persons with disabilities; construction of new housing; the Homebuyer program; leveraging for the homeless programs; and, rehabilitation of public housing units.

A map depicting the low-mod block groups is included in the Grantee Unique Appendices section and identifies areas where site specific activities proposed for FY2016 are located.

In Montgomery County, there are three municipalities where the percentage of Black/African Americans exceed the percentage in the County by 10%. The percentage of Black/African Americans in the County was 8.7% in 2010. The percentage in Cheltenham Township was 31.1%; the percentage in Norristown was 35%; and the percentage in Pottstown was 19.5%. No other minorities exceeded the percentages in the County.

In addition, persons of Hispanic origin represented 1.7% of the population in the County. Therefore, an area of ethnic concentration includes municipalities where the percentage of Hispanics is 11.7% or higher. There were no municipalities that met this criterion.

There were 15 municipalities identified as having at least one LMI block group, with four of those municipalities – Bridgeport, East Greenville, Royersford, and West Pottsgrove Township – having at least half of their block groups as LMI areas. Of the 15 municipalities, only Cheltenham Township was noted to be an area of minority/Hispanic concentration as well.

Discussion
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The County anticipates focusing its CDBG, ESG and HOME entitlement funds towards improving the quality of life in neighborhoods for extremely low, very low, and low income households, and to preserve and increase the stock of affordable owner and renter housing units. The following objectives have been established:

1. Expand homeownership – develop new homeownership opportunities through first-time homebuyer assistance, new construction and substantial rehabilitation of blighted housing.
2. Preserve existing housing – provide assistance to lower income homeowners to rehabilitate their homes to meet code standards.
3. Expand rental housing – provide assistance to developers to construct new rental housing or conversion of non-residential facilities into housing.
4. Support the actions of the Montgomery County Housing Authority to improve public housing.
5. Support the actions of developers (non-profit and for-profit) seeking funds to develop housing to address the needs of persons with disabilities and the elderly.
6. Support the development of new permanent supportive housing for persons who need more than just an apartment to end the cycle of homelessness.
7. Strategically use the allocation of Tenant Based Rental Assistance Vouchers

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 11 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 12 - One Year Goals for Affordable Housing by Support Type
Discussion

Projects funded in 2016 with CDBG and HOME funds to address one-year goals and actions for affordable housing include:

1. Genesis Housing Corp County-Wide Homeowner Rehab Program $250,000: Continuation of the Homeowner Rehab Program to provide lower income homeowners, especially senior citizens and disabled persons, with safe and decent housing. Clients served: 10. Genesis Housing is located at 208 DeKalb Street, Norristown, PA 19401 (CDBG funding)

2. HOME Advanced Living - New Construction - Main Street Senior Housing a 60 unit age restricted affordable housing development for low to moderate income seniors. Project location is 606-608 East Main Street, Lansdale. Eleven units will be designated HOME units. (HOME funding)

3. Genesis Housing Corporation: Acquisition/Rehab/Rental - Acquire one blighted property to rehabilitate into affordable rental unit in Montgomery County. (HOME funding)

4. Resources for Human Redevelopment: Provide funds to renovate a group home located at 2317 Coles Blvd, East Norriton Township. Renovations include kitchen rehabilitation to update for space and usability including countertops, cabinets, appliances, flooring and lighting along with basement waterproofing to include trench excavating, two sump pumps, wall restoration and cracked floor repair. (HOME funding)

5. North Hills Manor Housing LP - Demolition and New Construction: Funding for the revitalization of North Hill Manor, a 3.03 acre general occupancy public housing development. Project will include the complete demolition of all units and the existing community building and the construction of a new community building and fifty replacement units. The Manor is owned by the Montgomery County Housing Authority and will partner with Pennrose Properties as the developer for this project.
Introduction

The Montgomery County Housing Authority (MCHA) owns and manages 616 public housing units located in four high-rise towers, reserved for elderly and disabled residents, and four family communities in eight developments in five of the County’s sixty-two municipalities. Three hundred fifty nine units (58.4%) are located within Pottstown. Almost all of the public housing units are occupied, with an annual turnover rate of 60 units.

Of the 584 families, Small families, with 2-4 members comprised 180 the tenant households; while households with a disabled member comprised 118 households and 258 households included an elderly member. Non-White households represent 221 tenant households, Hispanic households totaled 35.

In addition to public housing, the Authority administers the Housing Choice Voucher Program serving approximately 2,404 families as of July 2015. Small Families comprised 1,228 voucher households, while households with a disabled member represented 103 voucher holders. Non-White households accounted for 1507 voucher holders. The waiting list for Housing Choice Vouchers has been closed since 2013.

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

1. The County has awarded $325,000 in HOME funds to North Hills Manor Housing LP, which is owned by Montgomery County Housing Authority, to revitalize North Hill Manor, a 3.03 acre general occupancy public housing development in Glenside, Upper Dublin Township. Project will include the complete demolition of all units and the existing community building. A new community building will be constructed and fifty (50) replacement units, of which eight (8) are one bedroom units, twenty-one (21) are two-bedroom units, fifteen (15) are three bedroom units and six (6) are four bedroom units.

2. The County has awarded $675,000 in Affordable Housing Trust Funds to North Hills Manor Housing LP. The project description is above.

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

MCHA administers the Family Self-Sufficiency Program, a HUD program that encourages communities to develop local strategies to help Voucher families obtain employment and work toward economic independence and self-sufficiency. MCHA works with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that
pays a sustainable wage.
Each MCHA public housing community has a resident council. The resident councils have input and involvement in the following activities: management operations, modernization needs, the Family Self-Sufficiency Program, and the homeownership program. The resident councils attend regular meetings and take part in the planning processes for both the Five-Year and the annual Public Housing Authority (PHA) plans that are submitted to HUD.

Priority resident initiatives include: repositioning/redevelopment efforts at Crest Manor and North Hills Manor and intensive outreach to involve both the resident councils and residents in the redevelopment process, individualized support for general occupancy and senior needs, active communication and notice between MCHA and the residents. The Authority continues to operate a Goodwill Senior Program which employs elderly individuals who live at the individual public housing site. Another effort is a one-time rent calculation allowance given to residents who receive an increase in household income. This helps to foster employment and mobility without penalty. Finally, the sale of the last of 79 public housing units located in Norristown to a first-time homebuyer has taken place during the last several years.

MCHA strives to maintain a high quality living environment for its residents. MCHA uses the following HUD manuals as guides to implement its management and maintenance policies:
- Admissions and Continued Occupancy Handbook;
- PH Maintenance Plan Document;
- FSS Action Plan;
- Public Housing Assessment System Manual;
- Section 8 Administrative Plan;
- Housing Inspection Manual;
- Section 8 and Voucher Program Master Book; and
- HUD Handbook 7420.7

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

Not Applicable

Discussion
AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

In 2014, the Department of Housing and Community Development (DHCD) established a new program, Your Way Home (YWH) Montgomery County, funded with Affordable Housing Trust funds. Your Way Home Montgomery County is a new and more effective system for preventing and ending Homelessness. Montgomery County residents experiencing a housing crisis will simply contact the YWH call center, a toll-free hotline for screening and referral to three newly formed community-based Housing Resource Centers (HRC’s). HRC’s serve as central locations for coordinated housing crisis response for families and individuals in each major region of Montgomery County, connecting residents with needed resources, support and community connections to secure permanent housing and remain stably housed. HRC’s use a progressive engagement strategy, a nationally recognized best practice in addressing homelessness, to provide customized levels of assistance to families and preserve the most expensive interventions for residents with the most severe barriers to housing success. HRC’s connect our most vulnerable residents, including persons with mental, physical, or developmental disabilities, substance use disorders or diagnosed with AIDS and related diseases, to specialty providers skilled in helping these populations secure and maintain permanent supportive housing.

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 Montgomery County Housing Council’s Continuum of Care has been working to address homelessness and the priority needs of homeless individuals and families, including subpopulations, for many years. The CoC addresses the housing and supportive service needs in each stage of the process to help homeless persons make the transition to permanent housing and independent living. Montgomery County will continue to support the CoC strategy in meeting the needs of homeless persons and those at risk of becoming homeless.

A Homeless Management Information system (HMIS) is administered by Montgomery County. It is a computerized data collection application designed to capture client level information over time on the characteristics and service needs of homeless persons. It is a valuable resource and important part of outreach efforts to assess the effectiveness of services and their delivery to prevent homeless in Montgomery County at any point in time.

Montgomery County developed a five-part strategy for ending homelessness as part of its 2008 Annual Action Plan 2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Montgomery County Ten-Year Plan to End Homelessness. This comprehensive strategy starts with data collection and analysis and then specifies how to specifically expand affordable housing for the homeless. It also defines how to increase homeless prevention efforts through discharge policies and increased participation in mainstream services. These efforts are being combined with expanded, targeted services and community education on homeless issues to achieve positive change.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

Montgomery County’s Ten-Year Plan to End Homelessness has a strategy to combat chronic homelessness. The County will support all actions to implement this strategy. The CoC’s Strategic Plan has Objectives with the following Local Action Steps to attain HUD’s National Objective of ending chronic homelessness and moving families and individuals into permanent housing:

**Objective I – Increase the percentage of homeless persons moving from transitional to permanent housing to at least 63.5%:**
- Action Step 1: Work with MCHA to establish preference in public housing and Housing Choice Voucher Program for homeless households leaving transitional housing;
- Action Step 2: Establish County policies to prioritize use of County dollars for permanent housing affordable to families and individuals moving from transitional housing; and
- Action Step 3: Identify reasons for non-participation by private landlords in rental assistance programs and explore and implement new landlord initiatives that will increase housing available to homeless families and individuals.

**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**

Additional CoC’s Strategic Plan Objectives with the following Local Action Steps to assist homeless persons make the transition to permanent housing:

**Objective II – Increase percentage of homeless persons staying in Public Housing over 6 months to at least 71.5%:**
- Action Step 1: Develop a Housing Tool Kit for use by case managers and other service providers to assist homeless to obtain and maintain housing;
• Action Step 2: Develop and conduct training on tenant/landlord rights and responsibilities; and

Objective III – Increase the percentage of homeless persons employed at exit to at least 19%:
• Action Step 1: Work with the County Department of Economic Development and Workforce Investment Board to target homeless persons and to address specific impediments to their participation in employment programs;
• Action Step 2: Advocate with public welfare staff to maximize mainstream benefits for the homeless, including increasing awareness of how to assist food stamp recipients to utilize federal match for employment and training; and
• Action Step 3: Continue to increase access to education through the Power Program, a program for people with serious mental illness and co-occurring disorders

Objective IV – Decreasing the number of homeless households with children:
• Action Step 1: Develop pilot project with centralized intake for families and take other steps to move Montgomery County agencies addressing homeless families to the Rapid Re-housing Model;
• Action Step 2: Since close to 70% of homeless families are in transitional housing, work with the Montgomery County Public Housing Authority to establish preference in public housing and Housing Choice Voucher Program for homeless households leaving transitional housing; and
• Action Step 3: Examine and strengthen policies to better utilize and coordinate state Housing Assistance Program (HAP) resources with McKinney and other programs serving homeless families

Objective V – Create new Public Housing beds for chronically homeless persons:
• Action Step 1: Target 20 slots in County mental health housing plan funded with Health Choices Reinvestment dollars for the chronically homeless;
• Action Step 2: Adopt a policy to give priority to the chronically homeless in the County-funded Tenant Based Rental Assistance Voucher program; and
• Action Step 3: Designate Horizon House’s 2007 three-bedroom Shelter Plus Care program for chronically homeless individuals.

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.

According to the 2009 report Homelessness in Montgomery and Bucks Counties: An Assessment of Conditions, Resources, and Programmatic Needs, over half of the 61 homeless providers participating in
the CoC process are nonprofit or faith-based organizations. Many of these organizations provide critical case management services for the homeless, in addition to mental health and substance abuse recovery, parenting, psychological counseling, transportation, life skills, and legal services. A listing of these organizations is provided below:

- Accion Comunal Latinoamericana de Montgomery County (ACLAMO)
- Bridge of Hope Belmont
- CADCOM (private sector)
- Central Mental Health/Mental Retardation
- Circle Lodge, Inc.
- Community Lenders Community Development Corporation
- Coordinated Homeless Outreach Center (CHOC)
- Cradle of Hope
- Fair Housing Rights Center
- Family Services of Montgomery County
- Genesis Housing Corporation
- Habitat for Humanity
- Hedwig House
- Horizon House
- Housing Alliance of PA
- Independent Youth Housing
- Indian Valley Opportunity Center
- Inter-Faith Hospitality Network of the Mainline
- Inter-Faith Housing Alliance
- Keystone Opportunity Center
- Laurel House
- Magellan Behavioral Health
- Mental Health Association (private sector)
- Ministries at Main Street
- Montgomery County Department of Housing & Community Development
- Montgomery County Department of BH/DD
- Montgomery County Housing Authority
- Montgomery County Office of Aging
- Montgomery County Office of Children & Youth
- Norristown Ministries
- Northwestern Human Services
- Pennsylvania Department of Public Assistance
- Pottstown Cluster of Religious Communities
- Resources for Human Development
- Salvation Army of Norristown
- Salvation Army of Pottstown
- The Open Line
• Valley Youth House
• Veteran's Affairs
• Women's Center of Montgomery County

Montgomery County supports the efforts of these human service agencies, social service providers, and other organizations to continue to provide services and assistance to individuals and families who are at imminent risk of becoming homeless.

Discussion

Projects funded in 2016 to address one-year goals and actions for reducing and ending homelessness include:

CDBG Funding

1. Keystone Opportunity Center KOC Transitional Housing Operations for Homeless Households $40,000: Staff wages and program costs which will provide up to two years of transitional housing services for homeless families and single women in nine scattered site units. Additional supportive services will be provided. Clients served: 20. This will be carried out from offices located at 104 N. Main Street, Souderton

2. Laurel House Shelter Operations $49,265: Wages and employer-paid taxes for shelter staff positions (Housing Director, Shelter Manager and Shelter House Coordinator) that provide services for a 30 day emergency shelter for victims of domestic violence and their families. These positions manage and provide day to day operations of the shelter where clients receive temporary housing, counseling, legal advocacy and assistance in securing safe transitional/permanent housing upon exit. The program will serve approximately 200 individuals at the shelter. Administrative office is located at 605 Swede Street, Norristown, PA.

3. Resources for Human Development Shelter Operations $72,000: Funding will support the shelter operation food costs at a low demand homeless shelter for single men and women. The shelter provides 50 beds and can provide 15 Code Blue and 20 over-flow emergency shelter beds when needed and assists 390 persons per year. The Coordinated Homeless Outreach Center (CHOC) is located at Building 53 on the Norristown State Hospital grounds and administered by Resources for Human Development is located at 4700 Wissahickon Avenue, Suite 126, Philadelphia, PA 19144.

4. Salvation Army Norristown Shelter Operations/Code Blue $70,000: Shelter operations for 24/7 emergency shelter to homeless families throughout Montgomery County. Shelter serves seven families at a time as well as Code Blue clients. Clients to be served: approx. 224. Office is located at 533 Swede St, Norristown, PA 19401.

5. Salvation Army Pottstown Shelter Operations/Code Blue $100,000: Shelter operations for Lessig-
Booth Family Residences. Services for 24/7 emergency shelter to homeless families throughout Montgomery County. The shelter serves 11 families at a time as well as Code Blue clients. Clients served: approx. 275. Office is located at 137 King Street, Pottstown, Pa 19464

ESG Funding

Pottstown Cluster of Religious Communities (Pottstown HRC) Rapid Rehousing $245,162: Rapid Rehousing Rental Subsidies for homeless clients through the Your Way Home program. Clients served: 125. Services are provided at an office located at 57 North Franklin Street, Pottstown, PA 19464.

<table>
<thead>
<tr>
<th>One year goals for the number of households to be provided housing through the use of HOPWA for:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family</td>
</tr>
<tr>
<td>Tenant-based rental assistance</td>
</tr>
<tr>
<td>Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated</td>
</tr>
<tr>
<td>Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>
AP-75 Barriers to affordable housing – 91.220(j)

Introduction

A lack of quality affordable housing places housing cost burdens on low- to moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The housing efforts of the County are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability. Housing rehabilitation helps lower-income owners make much-needed repairs, which enables them to remain in their affordable homes, while the rental rehabilitation allows landlords to maintain decent housing and pass savings along to renters. Over the five-year period of the Consolidated Plan, Montgomery County will also work closely with agencies that provide expanded housing options to current and potential residents. These agencies include CHDOs and development corporations, both of which can assist many lower-income renters, including those with special needs. Revitalization efforts will continue to enhance the viability of neighborhoods through important street, sidewalk and other infrastructure projects.

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

In FY 2016, the County will provide funds to first-time homebuyers, existing homeowners, low income renters, and developers seeking to build affordable rental housing. These activities support housing choice by broadening the base of affordable housing units.

Because of its strategic location within the region, adjoining Philadelphia and convenient to transportation and jobs, the communities in Montgomery County are highly desirable. Much of the County is largely developed and there is limited land suitable for the development of housing. Demand for housing remains high. High demand in combination with a fixed supply of units and decreasing suitable land results in continuing upward pressure on the price of housing in the County.

Market obstacles:

Demand for housing in the County remains high, which translates to a limited supply and rising costs.

Regulatory obstacles:

These factors affect the supply of affordable housing in Montgomery County:

- A shortage of land zoned for townhouses, duplexes, mobile homes, apartments and small-lot
singles or a mix of housing types

- Land zoned for office parks that fail to permit mixed uses with medium and high-density residential uses
- Too much land zoned for industrial uses
- Minimum lot sizes that often start at one-half acre or more, which usually makes the construction of smaller single-family homes financially unfeasible due to the high land costs incurred by developers
- Where there is enough land zoned for residential uses and public sewer service is available, high tap-in fees may increase the cost of the home beyond affordability.

Financial obstacles:

Among households, the problems commonly cited in failing to locate affordable housing include a lack of savings for down payment and closing costs or a security deposit and high household debt. Another financial obstacle is developers who prefer to build expensive homes rather than more affordable homes due to higher profits.

Social obstacles

In Montgomery County, these include the perception that affordable housing is not necessary or desirable in some communities. NIMBYism (not in my back yard) has occasionally surfaced as an impediment to the production of affordable housing, particularly rental units.

The ability of the County to address these barriers is limited, as local governments ultimately have the authority to develop and enforce their land use and housing development regulations.

To overcome obstacles to the development of affordable housing, Montgomery County will continue to provide funds to development entities to expand the supply. Additionally, the County’s housing rehabilitation activities help to lower the cost of decent housing for lower income residents. Tenant-based rental assistance will be provided to disabled and elderly residents who find housing costs to be beyond their means. In many cases, these householders would likely otherwise end up in institutional care.

In addition, funding is provided to municipalities to expand and improve infrastructure. The existence of adequate infrastructure is a pre-requisite for development of housing at any density. Increasing housing density and decreasing the footprint of each living unit results in increased affordability.

Discussion

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
AP-85 Other Actions – 91.220(k)

Introduction

The County has developed actions planned to: address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead based hazards, reduce the number of poverty level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies. The actions are detailed in the following narratives.

Actions planned to address obstacles to meeting underserved needs

The Five-Year Strategic Plan identified the following obstacles to meeting underserved needs for community development activities:

- Limited resources, insufficient professional resources
- Increasing costs to complete projects
- Fragmented approach to local planning and lack of coordination in addressing infrastructure needs
- Lack of inter-municipal communication in addressing public facility needs
- The legal requirements to acquire and demolish/rehabilitate abandoned buildings is prohibitively complex and expensive

Unfortunately, community development funds can do little to address many of these persistent problems. However, the County's efforts to increase coordination of local municipal leaders have resulted in some joint planning and purchasing. Increasing communication will result in better government and a more efficient delivery of municipal services.

As demonstrated in the preceding sections, the County administers and supports a wide array of programs to expand housing choice and provide shelter and services. The Urban County's FY 2016 allocations address obstacles of affordability and availability of housing and homeownership financing, opening more opportunities for lower-income households. However, obstacles such as the high cost of housing in Montgomery County being prohibitive to a large number of working poor families will remain due to the scale of these problems and the limited resources available for their resolution.

Actions planned to foster and maintain affordable housing

Obstacles to meeting the affordable housing needs of the community include:

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. Montgomery County partners with public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes involving housing and community
development activities. In addition, several other obstacles to meeting underserved needs include:

- Increased need for affordable housing and supportive services resulting from economic downturn – while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and
- Increased foreclosures & unemployment – in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure rate, the associated problem of poor credit, and rising unemployment

As evidence in the preceding sections, the county is funding a significant number of programs to expand housing choice and provide shelter and services. Emphasis has been placed on homeless prevention as well. The funds allocated by Montgomery County for FY 2016 address obstacles of affordability and availability of housing and homeownership financing. By providing funding for a number of housing activities, an expanded housing choice is available to lower income residents. Obstacles such as the cost of housing being out of reach for a large number of working poor families will remain due to the scale of the problem and the limited resources available to address these problems

**Actions planned to reduce lead-based paint hazards**

Lead based paint hazard reduction has been integrated into the County’s housing policies and programs. In addition, the EPA guidelines for Renovation, Repair and Painting effective in 2010 have also been incorporated. The lead guidelines require that:

1. The guidelines for the Housing Rehabilitation Program comply with the lead based paint hazards at 24 CFR Part 35.
2. When paint is disturbed in the course of non-emergency rehabilitation work in properties constructed prior to January 1, 1978, only a qualified contractor performs lead hazard reduction activities. The contractor must employ a certified lead-based paint abatement supervisor, or have employees certified in lead-based paint abatement. Certified testing companies perform a prerehabilitation risk assessment for lead-based paint hazards and a postrehabilitation clearance test for lead dust hazards where the non-emergency work disturbs a painted surface.
3. Contractors trained in Lead Safe Work practices may be employed on projects costing less than $25,000.
4. Lead paint hazard reduction is an eligible rehabilitation activity funded by the Housing Rehabilitation Program.
5. Households participating in the First-Time Homebuyers Program and other programs funding assistance for home ownership are not allowed to purchase units that have deteriorated interior or exterior painted surfaces. An exception to the requirement is...
allowed where minimal deteriorated paint surfaces exist and the seller is willing to have the surfaces tested, at their expense, by certified lead-based paint inspectors or risk assessors to determine if the deteriorated paint contains lead. If the paint contains lead, the household is not permitted to purchase the property and the agreement of sale becomes null and void. If it is determined by the testing that there is no lead-based paint, then the household can purchase the property provided that all deteriorated paint surfaces and any other Housing Quality Standards violations are corrected prior to settlement.

7. Units that are rented to households with young children (under age 6) receiving rent assistance through HPRP or TBRA will be inspected for deteriorated interior or exterior painted surfaces. Units with defective paint are not eligible for rent assistance unless the paint can be shown to lead-safe.

**Actions planned to reduce the number of poverty-level families**

Poverty is a function of income, which is related to education, job training and employment. Montgomery County remains committed to addressing the needs of its citizens who live at or below the poverty level. It is also recognized that the presence of poverty and the related social and economic problems are a destabilizing element in some neighborhoods.

In Montgomery County, Community Action Development Commission (CADCOM) is the official anti-poverty agency. CADCOM provides rent assistance, utility assistance, case management and counseling services to assist with financial management and benefit entitlement assistance, home weatherization to reduce utility costs, Family Savings Accounts, furniture and household goods, alcohol and mental health counseling, a Family Savings Account Program, child care, provides roundtrip transportation to work for up to six months and also assistance in purchasing a dependable vehicle, and other varied programs that empower low-income households assisting them to develop skills for independent living. In support of employment opportunities, CADCOM provides the following programs.

Micro-Enterprise Resource Center (MERC) provides entrepreneurial training to individuals interested in starting or expanding a business. MERC serves as the hub of business start-up information and a training facility for aspiring business owners and home daycare providers. Program participants complete a ten-week training session to help prepare them for the task of business ownership. Upon completion of the programs MERC helps participants to secure loans through the Montgomery County Micro Loan as well as the SBA.
CADCOM Employment and Training (CEAT) provides assistance in developing general office skills, interviewing skills, resume building, and dress for success. Annually Montgomery County provides CDBG funds to public service agencies to assist households below the poverty level with services. The County will continue to work with service providers to pursue resources and innovative partnerships to support the development of affordable housing, rental assistance, homelessness prevention, emergency food and shelter, health care, children’s services, job training, and employment development.

To assist with economic development in support of creation of jobs, Montgomery County continues to administer various initiatives and agencies in support of economic development.

The Montgomery County Department of Commerce and Economic Development (CED) offers start-up and business planning assistance, marketing existing financial assistance programs, and relocation assistance. Montgomery County Development Corporation (MCDC) acts as the area loan organization for various State loan programs. MCDC is run by an Executive Director and governed by a Board of Directors that is appointed by the County Commissioners. MCDC is assisted by staff from CED.

Montgomery County Industrial Development Authority (MCIDA) is also governed by a Board of Directors appointed by the County Commissioners. As an authority, MCIDA is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.

Montgomery County CareerLink offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a onestop location for all your employment needs, CareerLink offers much more than searching for jobs online. Specialized services for mature workers, youth, people with disabilities, veterans, dislocated workers and cash assistance recipients are located at CareerLink.

**Actions planned to develop institutional structure**

The Administrator of the Department of Housing and Community Development oversees the administration of all CDBG, HOME, and ESG entitlement programs in addition to the Affordable Housing Trust Fund and the Pennsylvania Housing Assistance Program. DHCD also applies for and administers other funding sources, ensuring all resources are highly integrated and administered efficiently. DHCD is responsible for the following:
Program management and oversight
Inter Department/Agency Coordination
Sub-recipient contract administration and monitoring
Program evaluation
Report preparation and submission
Public education and participation
Special project development
Consolidated Plan preparation, monitoring, and evaluation
Housing programs

The daily oversight of activities for all programs and initiatives comes under the Deputy. In addition to community development and housing support, County staff provides assistance to sub-recipients of grants and loans. The sub-recipient grants and loans include, but are not limited to, Community Development Block Grants (CDBG), Stewart B. McKinney Act funds, HOME, Pennsylvania Department of Community and Economic Development funds, and Pennsylvania Housing Finance Authority (PHFA) loans, among others.

Other County agencies that participate with housing, community development, and economic development in Montgomery County are as follows:
- Montgomery County Planning Commission (MCPC) is an advisory body on land use, transportation of all types, the environment, water and sewer service, parks and open space, farmland preservation, stormwater management, site design, housing, zoning, development patterns and demographic trends in the county. MCPC serves as staff to the County's Commissioners on the above planning issues. MCPC is responsible for the Comprehensive Plan. MCPC conducts reviews of local zoning and land development ordinances to ensure conformance and consistency with the Comprehensive Plan. MCPC provides support to the 62 municipal governments through various services and technical assistance.
- The Redevelopment Authority of Montgomery County carries out urban renewal including blight clearance, selling improved land for economically and socially desirable development in accordance with officially approved plans, and providing affordable housing programs.
- Montgomery County Office on Aging and Adult Services (MCAAS) is responsible for planning, coordinating, and monitoring services for County residents age 60 and older. MCAAS also provides social services for individuals ages 18 to 59 who are financially eligible for the services and meet the conditions of need. In addition to casework services, MCAAS

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

The Department of Housing and Community Development (DHCD) is responsible for the coordination of the various planning activities and implementation of the program. Coordination and cooperation continues to be one of the most important elements in the implementation of the Five-Year Housing and Community Development Strategy. To ensure that service delivery coordination is continued, it is
essential that each agency share data, exchange information, and consult and coordinate with each of the other service providers. The County’s primary means of connecting and networking with housing and service providers in the region is as follows:

- The County initiated the Your Way Home program in 2014 to implement and coordinate all homeless services from all County departments that provide services to homeless people.

The County provides strong leadership and planning to coordinate activities and functions and facilitate communication between County departments and their staffs. Through public meetings and hearings on projects and applications for funding, Montgomery County will continue to provide a forum where private and public entities can discuss community development, housing, and other issues. The County will consider its activities in relation to Federal and State agencies to ensure that all-available programs are considered. Montgomery County will consider opportunities to work with the municipalities and local non-profit agencies to coordinate efforts to provide necessary services. These coordinated efforts will provide affordable housing opportunities to low-income persons.

Discussion
Program Specific Requirements
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction

Projects planned with all CDBG, ESG, and HOME funds expected to be available during the year are identified in the projects table. The executive summary includes the objectives and outcomes identified in the plan as well as an evaluation of past performance, and a summary of the citizen participation and consultation process.

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 0
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: 0

Other CDBG Requirements

1. The amount of urgent need activities 0

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 100.00%

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

Annual Action Plan 75
2016
as follows:

The HOME funds that the County utilizes and the form of investment conform to 92.205(b). The County does not utilize forms of assistance not specified in 92.205(b).
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:

Montgomery County uses HOME funds for two types of homebuyer activities. They are:

1) downpayment program, which provides loans of up to $10,000 to help with down payments and closing costs, and

2) new construction program, which provides direct buyer subsidy for houses constructed or rehabbed, in whole or in part, with HOME funds, generally built or rehabbed by the County's non-profit partners, both CHDO and non-CHDO alike and sold to a HOME-eligible household.

Montgomery County has chosen to use the Recapture option for all programs. The HOME program's investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to the County should the property be sold during the period of affordability.

For the new construction program, repayments are in the amount of the direct homebuyer subsidy pro-rated over the period of affordability and subject to availability of net proceeds. The direct subsidy is the amount of HOME funds used to reduce or help reduce the sales price from market value to an amount affordable to the buyer. The recapture amount is calculated using the following formula:

 HOME direct subsidy/Period of affordability x Years remaining in period of affordability = Recapture Amount

For the downpayment assistance program, all HOME funds are considered the direct subsidy and repayment is in full, subject to the availability of net proceeds.

In the event that net proceeds – defined as sales price less other debt on the property – are insufficient to repay the entire recapture amount, the amount to be recaptured shall be determined by the following formulas:

For the downpayment program: HOME direct subsidy/Total project cost x net proceeds = Adjusted Recapture Amount.

For the new construction program: HOME direct subsidy/Total project cost x Years remaining in period of affordability/period of affordability x net proceeds = Adjusted Recapture Amount.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The HOME program's investment, and thus the period of affordability, is ensured in all cases by a
mortgage and note payable to the County should the property be sold during the period of affordability.

4. Plans for using HOME funds to refinance existing debt secured by multifamily 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 be using any HOME funds to refinance debt secured by multifamily housing that is being rehabbed with HOME funds.

**Emergency Solutions Grant (ESG)**
**Reference 91.220(l)(4)**

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

The County of Montgomery’s written standards for providing ESG assistance are included as in the Application attachment in the Grantee Unique Appendices.

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

The CoC has established a coordinated entry system called Your Way Home. Your Way Home includes a single, toll-free Call Center that provides all initial screening and assessment into the homeless service system. The Call Center utilizes the evidence-based assessment tool called the Vulnerability Index- Service Prioritization and Decision Assistance Tool (VI-SPDAT). Persons are triaged for entry into emergency shelter based on (1) living outdoors, and (2) highest vulnerability as indicated by the VI-SPDAT. When a shelter has an opening, they take the top referral from the list provided by the Call Center. Once in shelter, homeless individuals and families are then triaged for permanent housing programs based on their level of vulnerability. Your Way Home operates 3 regional Housing Resource Centers which provide the rapid re-housing program for all persons in shelter in Montgomery County. Domestic violence shelters and youth organization also provide rapid re-housing for those specific populations, and coordinate with the Housing Resource Centers to do so. Households are enrolled in rapid re-housing for up to 24 months with decreasing rental subsidy as appropriate. Your Way Home also has a Permanent Supportive Housing Prioritization Policy in place to prioritize persons who are chronically homeless for PSH beds when they become available. All PSH providers have agreed to accept PSH referrals based on the recommendation of the policy. Lastly, Your Way Home launched a Diversion program in January 2015 to provide limited assistance to persons requesting emergency shelter placement who are not living on the street in order to provide alternative resources to prevent households from becoming homeless when possible.

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
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 County of Montgomery’s written standards for the application and allocation process are included in the Application attachment in the Citizen Participation Appendix. The County of Montgomery, through its Department of Housing and Community Development, announces the availability of Community Development Block Grant Program (CDBG) funds, HOME funds, and ESG funds. Funds are awarded through an application process. Applications for funding can be submitted by: 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) Homeless Shelters and 5) private developers.

The County of Montgomery, through its Department of Housing and Community Development, announces the availability of Community Development Block Grant Program (CDBG) funds, HOME funds, and ESG funds. Funds are awarded through an application process. Applications for funding can be submitted by: 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) Homeless Shelters and 5) private developers.

The County Housing and Community Development staff reviews each project proposal as it relates to federal and county eligibility criteria and fundability criteria. Prior to the actual review process a preliminary screening of the application will take place testing for completeness. Staff will assess how the application will meet the goals of the County’s Five-Year Consolidated Plan and how the project will accomplish those goals. Upon selection, all recipients will be notified of the grand amount after October 1, 2015 following federal acceptance. All program participants will be required to execute a Subrecipient Agreement with Montgomery County. Specific instructions on how to begin implementation of the project will be given to you at an orientation meeting prior to the start of the project. No costs incurred prior to the execution of the Grant Agreement and Notice of Environmental clearance will be reimbursed by the County Community Development Program. Any costs incurred and paid for prior to proper notification of clearance can jeopardize the use of funds on the project.

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.

The Montgomery County Department of Housing is the CoC Lead Agency for PA-504/Montgomery County/ Lower Merion/ Norristown/ Abington continuum of care. Our CoC Governance Board, which is 13 members and elected on 2 year terms, has a reserved membership slot for a homeless or formerly homeless individual. Currently this position is filled by a formerly homeless veteran.

5. Describe performance standards for evaluating ESG.

The evaluation of ESG applications is consistent with the evaluations of all applicants for the County’s Consolidated Grants Program funds (CDBG, ESG and HOME). A copy of these guidelines are included in the Grantee Unique Appendices.

Discussion
Attachments
Citizen Participation Comments

Table of Contents

CITIZEN PARTICIPATION DOCUMENTS - ATTACHMENTS

A - 2016 Citizen Participation Schedule
B - Public Notice Display Ad
C - Public Hearing/Training Sign In Sheets
D - Public Notice Display Ad June 2016
### Housing & Community Development
#### 2016 Program Year Schedule

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
<th>Staff</th>
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<tr>
<td>1/28/16</td>
<td>Schedule area meetings - locations - reserve rooms for training, Public Hearing in July and December, and Area Meetings</td>
<td>MH</td>
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</table>
| 1/28/16    | 1. Notify Applicants regarding CDBG/ESG/HOME/HAP Training Sessions on 3/1 and 3/3  
                                                        2. Notify COO, Deputy COO and Communications Director                                                                                      | GP KW McC DN CM |
<p>| 1/28/16    | Email advertisements to area newspapers on Feb 8th, RE: Citizen Participation                                                                                                                         | MH             |
| 2/5/16     | Mailing to Municipalities and Non-Profit organizations regarding Citizen Participation dates County Website – Citizen Participation dates                                                                 | McC KW MH KS TM KS |
| 2/12/16    | Deadline to update Applications for the 2016 Program Year. This includes updating the website. (announcement of training sessions and area meetings)                                                   |                |
| 3/1/16     | Training Session in HSC A&amp;B for Non-Profit applicants for CDBG/ESG/HAP 9:00 to 12:00                                                                                                              | TM KW CM DN GP McC |
| 3/1/16     | and HOME/CHDO 1:30 to 3:00                                                                                                                                                                         |                |
| 3/1/16     | SNOW DATE: 3/9/16 @ HSC Community Room (same time)                                                                                                                                                    |                |
| 3/3/16     | Training Session - HSC Community Room for Municipal applicants for CDBG 1:00 to 4:00 incl. Fair Housing Training SNOW DATE: 3/10/16 @ HSC A&amp;B (same time)                                                   | TM KW McC GP   |
| 3/9/16     | Citizen participation – Public Input 6pm at WG Annex, 3rd floor, Willow Grove                                                                                                                         | TM CM          |
| 3/10/16    | Citizen participation – Public Input 6pm at HSC (room A/B), Norristown Commissioner Meeting – Contract extension for TRIAD Associates                                                                     | GP GP McC &amp; Joe Coco |
| 3/17/16    |                                                                                                                                                                                                      |                |
| 4/4/16 to 4/8/16 | HUD monitoring visit - CDBG and HOME                                                                                                                                   | CM TM DN MH KW GP McC |
| 4/15/16    | DEADLINE FOR ALL APPLICATIONS                                                                                                                                                                    |                |
| 4/27/16    | Staff Committee convenes to evaluate and recommend preliminary funding for 2016 Program Year.                                                                                                         | TM KW McC GP CM DN |</p>
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<thead>
<tr>
<th>Date</th>
<th>Activity</th>
<th>Responsible</th>
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<tbody>
<tr>
<td>5/23/16</td>
<td>Final Staff Review of recommended projects</td>
<td>TM KW</td>
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<td>McC GP</td>
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<td>CM DN</td>
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<tr>
<td>5/26/16</td>
<td>Meet with Chair and Deputy COO to review recommended 2016 projects.</td>
<td>CM TM</td>
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<tr>
<td>5/31/16</td>
<td>Information Session with the Commissioners to review staff recommendations for 2016 projects and to prepare for the Commissioners Meeting on 6/16.</td>
<td>CM TM</td>
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<tr>
<td>6/3/16</td>
<td>Complete proposed project list. Send list and Resolution via e-mail to Commissioner's Office.</td>
<td>CM</td>
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<tr>
<td>6/2/16</td>
<td>Commissioners Meeting: Authorize the advertisement of the Annual Plan – Adv. from 6/20 to 7/20.</td>
<td>CM</td>
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<tr>
<td>6/3/16</td>
<td>Email the Annual Plan Notice to the Newspapers - advertise on June 20, 2016 (Announcing the public hearing) and website</td>
<td>MH KS</td>
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<tr>
<td>6/13/16</td>
<td><strong>Annual Plan - Available for Public Review</strong> 6/20 to 7/20 <strong>Update Website</strong> Notify applicants of the posted plan, by email blast with letter - “See website for details”</td>
<td>MH Triad</td>
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<td>KS</td>
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<tr>
<td>6/22/16</td>
<td>YWH Summit – MCCC Bluebell 9:00 to 12:00—All 3 Commissioners Scheduled to Attend. Chair Josh Shapiro to provide keynote address</td>
<td>DN KW GP</td>
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<tr>
<td>7/19/16</td>
<td>Annual Plan Public Hearing for Public Input 6:00 pm HSC – Conference Room A/B</td>
<td>YWH</td>
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<td>7/28/15</td>
<td>Information Session with the Commissioners – Annual Plan for Meeting on 8/6</td>
<td>CM</td>
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<td>CM TM</td>
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<td>7/29/16</td>
<td>WEBSITE – Revised list of proposed funded projects (if needed)</td>
<td>KS</td>
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<tr>
<td>8/4/16</td>
<td>Commissioners Meeting to adopt Resolution to submit the Annual Plan to HUD</td>
<td>CM</td>
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<tr>
<td>8/8/16</td>
<td>Final Annual Plan must have Public Comments Section and responses and a statement or document about Public Hearing.</td>
<td>CM</td>
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<tr>
<td>8/12/16</td>
<td>Notify applicants of funding or non-funding</td>
<td>CM MH</td>
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<tr>
<td>8/12/16</td>
<td>Deadline for Annual Plan submission to HUD. Triad &amp; Assoc. will FEDEX to HUD.</td>
<td>MH Triad</td>
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<tr>
<td><strong>10/1/16</strong></td>
<td><strong>BEGIN CAPER</strong></td>
<td>ALL</td>
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<tr>
<td>11/2/16</td>
<td>DRAFT 2015/2016 CAPER Completed</td>
<td>M&amp;L MH</td>
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<tr>
<td>11/24/16</td>
<td>1. Advertise availability of CAPER. Email area Newspapers of Public Hearing. CAPER must be completed by 12/1 to allow citizens to comment on annual performance 2. Post to website</td>
<td>MH KS</td>
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<tr>
<td>12/12/16</td>
<td>Public Hearing for CAPER - H&amp;CD Conference Room at 12 noon</td>
<td>TM</td>
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<tr>
<td>12/23/16</td>
<td>FEDEX CAPER to HUD - DEADLINE 12/28/16</td>
<td>MH Triad</td>
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DEPT OF HOUSING SERVICES
1430 DEKALB ST
NORRISTOWN, PA 19401
Attention:

STATE OF PENNSYLVANIA,
COUNTY OF MONTGOMERY

The undersigned _______________________, being duly sworn, do hereby certify that the newspaper is The Times Herald, Times Herald Digital, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are daily qualified newspapers, and the annexed return is a copy of certain order notices, publication or advertisement of:

DEPT OF HOUSING SERVICES

Published in the following edition(s):
The Times Herald 02/02/15
Times Herald Digital 02/03/15

Sworn to the subscribed before me this 15th day of January, 2016

[Signature]
Notary Public, State of Pennsylvania
Acting in County of Montgomery

ADVERTISEMENT INFORMATION
Client Id: 982796 Ad Id: 901437 PO: 
Sales Person: 093302

Annual Action Plan
2016
Proof of Publication of Notice in *The Reporter*

State of Pennsylvania  
County of Montgomery

Maureen Schmidt

Designated agent of *THE REPORTER*, being duly sworn, deposes and says that *THE REPORTER*, a daily newspaper of general circulation, published in Lansdale, Montgomery County, Pennsylvania, was established in the year of 1870, and has been regularly issued and published in Montgomery County continuously thereafter; and at a period of more than six months immediately prior hereto, the printed notice or publication attached is an exact copy of a notice published in the regular edition and issues of *THE REPORTER* on the following date, viz:

February 3, 2016

and that said advertisement was inserted in all respects as ordered.

Affiant further deposes that he/she is the proper person duly authorized by *THE REPORTER*, a newspaper of general circulation, to verify the foregoing statement under oath, and that all affidavits and other documents stated in the said affidavit and other documents were true.


[Handwritten signature]

Sworn to and subscribed before me this 8th day of February, 2016

[Notary Public]

COMMONWEALTH OF PENNSYLVANIA

NOTARY PUBLIC

MARIA S. BELLAS, Notary Public

Lansdale Borough, Montgomery County

My Commission Expires November 20, 2018

Annual Action Plan

2016

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THE MONTGOMERY COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

is initiating planning for the 2016 Annual Action Plan as part of its application for funding to the U.S. Department of Housing and Urban Development (HUD). As part of this planning process, the County will conduct three Public Hearings to provide County residents with information on the application process for the FY 2016 Community Development Block Grant Program (CDBG), the Emergency Solutions Grant Program (ESG), the HOME Investment Partnerships (HOME) Program, and the Homeless Assistance Program (HAP). In addition, the meetings will serve as information gathering sessions on the need for homeless prevention services, homeless shelters, transitional housing, affordable housing development, housing and services for those with special needs, community services for low and moderate income communities, economic development and public facilities/infrastructure needs in low and moderate income neighborhoods.

This is an opportunity for individuals and organizations to provide feedback to the County on the needs of low and moderate income residents, to learn about the programs and to be involved in determining how the County will use the approximately $4.5 million in allocations from HUD to improve our community. The County encourages participation of all its residents, especially the involvement of very low income residents, minorities and non-English speaking persons and persons with mobility, visual or hearing impairments.

The Public Hearings are being scheduled in the initial stages of development of the Annual Action Plan. The overall goal of this plan is to document the community

NOTE: Montgomery County Community College is not affiliated with the event and the College should not be contacted regarding the program.
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

**Location:** Room, South Hall
Montgomery County Community College
101 College Drive, Pottstown, PA

**Date:** March 8, 2016

**Time:** 6:00 PM

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**Comments:**
No members of the public were in attendance.
Meeting adjourned at 5:25 P.M.

Staff Attendance: Terence C. McMillan, Deputy Director
Steve Lingle, Trio Associates

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Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

Location: County Annex
Willow Grove, PA

Date: March 9, 2016

Time: 6:00 PM

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Comments:

No members of the public were in attendance. Minute added at 6:25 PM.
Staff: Corinne Rockmore, Tracie Martin, Steve Lincke, Tim Assoc.

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

Location: Conference Room A/B
Montgomery County Human Services Ctr.
Norristown, PA

Date: March 10, 2016

Time: 6:00 PM

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Comments: No members of the public were in attendance. Meeting was adjourned at 6:10 PM.

Staff: Grand Preachers
Steve Lingle, Trip Advisor
PUBLIC NOTICE
Availability of the Draft 2016 Annual Action Plan &
Notice of Amendment to Prior Years Annual Action Plans
For the County of Montgomery, PA

In accordance with the Federal regulations at 24 CFR Part 91, the County of Montgomery has prepared a Draft 2016 Annual Action Plan for Community Planning and Development Programs. This document is a requirement for direct assistance under certain U.S. Department of Housing and Urban Development (HUD) funding programs including the Community Development Block Grant Program (CDBG), the Home Investment Partnerships Program (HOME), and the Emergency Solutions Grant Program (ESG). Additionally, the County has included in the plan funding for projects to be funded through the local Affordable Housing Trust Fund (AHTF) and the Human Services Block Grant (HSBG), funded through the Pennsylvania Department of Public Welfare.

HUD regulations and Montgomery County’s Citizen Participation Plan require the publication of a notice which:

a) States the availability of the Draft 2016 Annual Action Plan and locations where copies are available for examination;

b) Summarizes the Draft 2016 Annual Action Plan; and

c) Allows citizens an opportunity to comment on the Citizen Participation Plan.

Availability
The Draft 2016 Annual Action Plan is available during the period of June 13, 2016 through July 19, 2016 for citizens, public agencies and other interested parties to examine its contents and to submit comments. Citizens may submit their comments through the mail, telephone or in person, Monday through Friday, 8:30 a.m. to 4:15 p.m. Comments will be received until July 13, 2016. Comments submitted by mail should be addressed to: Chair, Montgomery County Board of Commissioners, PO Box 311, Norristown, PA 19404-0311 or Carolyn Mayanja, Interim Director, Department of Housing and Community Development, PO Box 311, Norristown, PA 19404-0311.

Copies of the Plan are available for public inspection during regular County business hours at the following locations:

Montgomery County Commissioner’s Office
8th Floor, One Montgomery Plaza
425 Swede Street
Norristown, PA 19401

Housing & Community Development
5th Floor, Human Services Center
1430 DeKalb Street
Norristown, PA 19401

Copies of the Plan will also be available for public examination online at www.montcopa.org. Persons with disabilities or limited English-speaking ability requiring access to the plan in an alternative format should contact the Department of Housing and Community Development at 610-278-3540 or (TDD: 610-631-1211).

Summary

The purpose of the Draft Plan is to establish reasonable bases for housing and non-housing assistance. In this regard, it details the uses of expected funds in 2016. At this date, Montgomery County expects to receive
and allocate funds (including Program Income and Recaptured funds) as follows:
   a) $3,059,468 in CDBG funds for housing rehabilitation and non-housing needs (public facility, infrastructure, public service and homeless shelter projects);
   b) $1,143,295 in HOME funds for affordable housing needs;
   c) $1,551,497 from the Montgomery County Affordable Housing Trust Fund for housing needs;
   d) $265,035 in ESG funds for homeless needs and emergency shelter programs; and
   e) $889,952 in HSBG Funds for homelessness.

In accordance with federal regulation at 24 CFR Part 91 whenever the County proposes to amend an Annual Action Plan or the Five Year Consolidated Plan, the County is required to afford citizens an opportunity to comment on the proposed changes. As required in § 91.305 (b), Montgomery County has adopted a Citizen Participation Plan which sets forth the criteria the County will use for determining what constitutes an amendment to the Consolidated Plan and Annual Action Plans. Montgomery County has determined that the proposed activities described below meet the criteria for an amendment to the Annual Action Plans:

Community Development Block Grant
2012 Program Year
   Project Number: B-12-03-107     $100,000.00   Cancellation
   Pottstown Borough
   Laurel Street Area Storm Sewer Improvements

2014 Program Year
   Project Number: B-14-03-112     $31,000.00   Cancellation
   Springfield Township
   Oreland Village Street Improvements Phase II

   Project Number: B-14-05-202     $15,000.00   Cancellation
   Interfaith Hospitality Network of the Mainline
   Essential Services for Homeless

HOME Investment Partnerships Program
2015 Program Year
   Project Number: M-15-14-208     $218,317.00   Cancellation
   Housing Visions/Genesis Housing Corp
   Rehabilitation

These funds will be brought forward and made part of the CDBG program and HOME program proposed allocations for the 2016 Program Year.

The Draft 2016 Annual Action Plan includes the amount of funds which will benefit persons of very low, low, and moderate income, as well as plans to minimize displacement of persons. No displacement is proposed or expected.

Public Hearing
On July 19, 2016, a public hearing will be held on the 2016 Annual Action Plan at 6:00 p.m. at the Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA. Interested parties may attend the hearing and present their comments on the Draft Plan. The Montgomery County Human Services Center is accessible to persons with disabilities. If you have a special need and require an accommodation in order to participate, please contact Carolyn Mayinja, at 610-278-3540 or TDD:
Advance notice of 5 days is required for sign-language or non-English speaking interpreter services.

Citizens who may have an interest in projects which may impact historic resources should make themselves known so that the County can involve them in the notification and review process of the National Advisory Council on Historic Preservation (as set forth in 36 CFR Part 800). Please contact the Department no later than July 12, 2016 to be included in the Part 800 notification process.

The Board of Commissioners has a meeting tentatively scheduled for July 21, 2016, to take final action on the Plan. County residents wishing to attend this Commissioners’ meeting can visit the County’s website at www.montcopa.org for exact date and time of the meeting. After considering citizen comments, the Plan will be adopted with such modifications as deemed appropriate. Montgomery County intends to submit the 2016 Annual Action Plan to HUD, on or before August 15, 2016. HUD approval is expected on or before October 1, 2016.
<table>
<thead>
<tr>
<th>Name</th>
<th>Mailing Address</th>
<th>Email</th>
<th>Do you wish to speak?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steve Linke</td>
<td>Third Avenue</td>
<td><a href="mailto:steve@haramcofoundation.org">steve@haramcofoundation.org</a></td>
<td></td>
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<tr>
<td>JADE ZIEGLER</td>
<td>LOUS VINE ST LANDALE</td>
<td><a href="mailto:LANDALE12@LANDALE.COM">LANDALE12@LANDALE.COM</a></td>
<td></td>
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<tr>
<td>Barbara Sculley</td>
<td></td>
<td><a href="mailto:scu@landale.org">scu@landale.org</a></td>
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<tr>
<td>JACOB JOYNER</td>
<td></td>
<td><a href="mailto:jockey@landale.org">jockey@landale.org</a></td>
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<tr>
<td>Colleen Landy</td>
<td>Valley Youth House</td>
<td>claridyvalleyouthhouse.org</td>
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<tr>
<td>Matthew Sayre</td>
<td>Community Office</td>
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<tr>
<td>Joe Case</td>
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<td>Tom Hallinan</td>
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<td>Jordan Hairston</td>
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<td>TROY HARRISON</td>
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<tr>
<td>Rex Pitts</td>
<td>Community</td>
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</table>
We bring great days, and nights, to families.
**REGION**

Local lawmakers call for continued EPA, DOD action

By Dan Still, the state’s rep for filters, blood testing for Horsham area residents

The PA House of Representatives on Wednesday passed a resolution to authorize three local lawmakers urging the federal government to address the ongoing water-cleaning problems in Horsham, Lower Moreland and Warrington.

"I am especially concerned that the EPA knows about the water issues and is doing nothing for infants to flow into the homes for more than a year," said Rep. Rep. Stephanie C. Thomas, R-Delaware County.

Stephanie and fellow Reps. Kathy Watson, R-Delaware County, and Bernadette O'Neil, R-Upper Dublin, all6 submitted a House Resolution 98, which directs the Environmental Protection Agency to develop a plan to address the contamination and provide a comprehensive overview of the severity of the contamination and the number of residents and workers who may be impacted.

"Residents have many questions regarding their health and how any water that was used at these federal facilities and how their health may be adversely affected," Watson said in a statement.

These residents, many of whom live in the area for a long time and have raised their families here, deserve to know what's going on and what can be done to prevent it from happening again and to be hearing from the experts about what can be done at the Navy and the Warrington Water Authority to fix the water issues.

In addition to improve and protect our quality of life, our communities must be assured of a safe and reliable water supply," O'Neil said.


"As we continue to build on the progress made in the past year, we must ensure that the residents of Horsham and Warrington have access to clean and safe water," Boyle said. "I am calling for a congressional hearing on this issue." He added in a statement.

In recent months, Boyle and several other local lawmakers have called on the EPA and Navy to provide more transparency about the contamination and the risks posed to our community. That's why I am calling for a congressional hearing on this issue. In April, the lawmakers called on the EPA to act quickly to address the public health crisis and ensure a safe and reliable water supply for residents and workers in the area.

While residents continue to call for attention to this issue, the EPA has taken steps to address the contamination and improve the water supply.

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**Pennsylvania**

Gov. Wolf to military: Fund blood tests over tainted water

The Associated Press

WASHINGTON (AP) — Pennsylvania lawmakers are seeking $2 billion to fund blood tests for $2 billion to fund blood tests for military veterans in the state who may have been exposed to contaminated water.

The U.S. Department of Veterans Affairs has acknowledged that 7,000 veterans in the state have been exposed to contaminated water at three military installations.

"We believe blood testing is critical in addressing the concerns of the private citizens who may have been exposed," said Rep. Rep. Stephanie C. Thomas, R-Delaware County.

The House Education Committee has approved a bill that would provide $2 billion for blood testing. The Senate has already approved a $2 billion bill.

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**Philadelphia**

Soda tax sold public interest over health

The Associated Press

The soda industry is the city’s cheesemakers and soft drink bottlers have been a vocal opponent of Philadelphia’s soda tax, which regulates public health and healthy living. The tax has been a success, with revenue used to fund public health programs.


The tax, which went into effect last year, has generated $5.7 billion in revenue for the city, with the majority going to the city’s health department and other public health programs.

The soda industry has argued that the tax is unfair and discriminatory, targeting lower-income families and disproportionately affecting minority communities.


The city has also received criticism for its use of the revenue, with some calling for more transparency and accountability in how the funds are spent.

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**North Carolina**

Annual Action Plan 2016

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While residents continue to call for attention to this issue, the EPA has taken steps to address the contamination and improve the water supply.

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PUBLIC NOTICE

Availability

The Draft 2016 Annual Action Plan is available during the period of June 13, 2016 through July 19, 2016 for citizens, the public agencies, and officers to review and comment. To view the plan online, go to http://www.montgomerycounty.gov/haa for more information. Comments may be submitted at the above site. Written comments on the Draft 2016 Annual Action Plan will be accepted through July 19, 2016. Written comments should be addressed to: Montgomery County Human Services Center, 1235 Dillet Street, Norristown, PA 19401. Please contact Ms. Deborah S. McManus, Executive Director, at 610-276-2560 for more information.

Summary

The Draft 2016 Annual Action Plan addresses and contains Montgomery County’s Housing, and Non-Housing Needs, Objectives, Proposed Projects, on Action Plans, and other required information. The purpose of the Draft Plan is to establish reasonable baselines for funding and non-funding assistance. In this regard, it details the needs, goals, and strategies to address the housing and non-housing needs of the community. The Draft Plan includes the following:

1. A $400,000 increase in the CDBG total funds for housing rehabilitation and non-housing needs for housing facilities, public service, and homeless shelter projects;
2. A $140,000 increase in the CDBG total funds for affordable housing needs;
3. A $1 million increase in the CDBG total funds for the Marinette County Affordable Housing Fund.

The Draft Plan provides a comprehensive approach to address the housing and non-housing needs of the community. Comments on the Draft Plan are welcome and should be submitted by July 19, 2016.
Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
SECTION I

GENERAL INTRODUCTION

A. The Application Concept

The County of Montgomery, through its Department of Housing and Community Development, is announcing the availability of Program Year 2016 Community Development Block Grant Program (CDBG). CDBG funds will be awarded through this application process.

The Non-Housing Community Development Plan goals that are described in the 2015-2019 Consolidated Plan are as follows: improvement of public facilities; improve the existing infrastructures; specifically, improvements to low income neighborhoods burdened with storm and sanitary sewer problems; establish a working relationship with social service agencies and to provide the necessary gap funding for the increasing service needs; the removal of architectural barriers which restrict the mobility and accessibility of elderly or handicapped persons; Historic Preservation, Economic Development and long range Planning. The provision of homeless assistance and supportive services to assist homeless individuals, homeless families and non-homeless persons with special needs to obtain and maintain self-sufficiency.

Montgomery County 2015-2019 Consolidated Plan can be accessed on the Housing and Community Development web site. The 2015-2019 Priority Needs are located on Table 48 pages 114 through 123.

Through the application process, Housing and Community Development is requesting all applicants to examine their approach to meeting the goals previously set in the Five-Year Strategy outlined in the 2015-2019 Consolidated Plan. Housing and Community Development encourages a comprehensive approach, which integrates all available resources. HUD entitlement Community Development Block Grant (CDBG) programs are excellent sources of flexible dollars to address locally identified needs.

B. The Application Process

Montgomery County’s Department of Housing and Community Development is responsible for administering the CDBG program in accordance with the requirements of the 1974 Housing and Community Development Act, as amended; (24 CFR Part 570.).

Applications for funding should be submitted by; 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) Homeless Shelters and 5) private developers.

The following municipalities have elected not to participate in the County’s program and therefore projects that primarily serve these communities generally are not eligible:
**C. Competitive Review Process**

County Housing and Community Development staff will review each project proposal as it relates to federal and county eligibility criteria and fundability criteria. Prior to the actual review process a preliminary screening of the application will take place testing for completeness. Staff will assess how the application will meet the goals of the County’s Five-Year Consolidated Plan and how the project will accomplish those goals.

Upon selection, all recipients will be notified of the grant amount after October 1, 2016 following federal acceptance. All program participants will be required to execute a Subrecipient Agreement with Montgomery County. Specific instructions on how to begin implementation of the project will be given to you at an orientation meeting prior to the start of the project. **No costs incurred prior to the execution of the Grant Agreement and Notice of Environmental clearance will be reimbursed by the County Community Development Program. Any costs incurred and paid for prior to proper notification of clearance can jeopardize the use of funds on the project.**

**Department Floodplain Policy**

The Department of Housing and Community Development will not fund new residential development in the identified 100-year floodplain. In accordance with Section 202 (a) of the Flood Disaster Protection Act of 1973, (42 U.S.C. 4106) no Federal officer or agency shall approve any financial assistance for acquisition or construction purposes (as defined under section 3(a) of said Act (42 U.S.C. 400(a)), one year after a community has been formally notified of its identification as a community containing an area of special flood hazard, for use in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, unless:

a. The Community in which the area is situated is participating in the National Flood Insurance Program, and

b. The subrecipient assures that flood insurance is obtained for all assisted housing units in the identified 100-year floodplain.
Section II

NATIONAL OBJECTIVES

Community Development Block Grant Program (CDBG)

The Community Development Block Grant program provides assistance for housing and community development activities. In order for a project to qualify for CDBG funding, it must meet at least one of the three statutory objectives of the 1974 Housing and Community Development Act, as amended. These objectives are as follows:

1. **Activities benefiting low- and moderate-income persons.** Activities meeting any one of the following criteria will be considered to benefit low and moderate income persons unless there is substantial evidence to the contrary:

   a. **Area benefit activities.** An activity, the benefits of which are available to all the residents in a particular area, where the proportion of low and moderate income persons in the area is within the highest quartile of all areas in the urban county’s jurisdiction in terms of the degree of concentration of such persons. In applying this provision, HUD has determined the lowest proportion Montgomery County may use to qualify an area for this purpose is 38.10%. Such an area need not be coterminal with census tracts or other officially recognized boundaries but must be the entire area served by the activity. The appropriateness and reasonableness of the service area should be based on the nature and magnitude of the activity. For purposes of determining qualification under this criterion, activities of the same type that serve different areas will be considered separately on the basis of their individual service area. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion. All applicants are advised to verify with the County’s Housing and Community Development staff that the proposed activity is located within a low and moderate income service area. (See Exhibit I at the end of this section for a discussion of service area.)

   Additional areas may qualify if an income survey is conducted and it demonstrates that 51% or more of the persons residing in the service area are low and moderate income. Instructions for the survey are available from the Montgomery County Department of Housing and Community Development. All income survey documentation must be completed and submitted with the application due by 4:15 p.m., Friday, April 15, 2016.

   b. **Limited clientele activities.** An activity which benefits a limited clientele, at least 51 percent of whom are low- or moderate-income persons. (The following kinds of activities may not qualify as benefit to limited clientele: activities, the benefits of which are available to all the residents of an area; activities involving the acquisition, construction, or rehabilitation of property for housing; or activities where the benefit to low- and moderate-income persons to be considered is the creation or retention of jobs.) To qualify as a limited clientele benefit the activity must meet one of the following tests:
(i) Benefit a clientele who are generally presumed to be principally low and moderate income persons. Activities that exclusively serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons, 51 percent of whom are low- and moderate-income (See Table II-1 below for presumed income categories): abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," homeless persons, illiterate persons, persons living with AIDS, and migrant farm workers; or
(ii) Require information on family size and income so that it is evident that at least 51 percent of the clientele are persons whose family income does not exceed the low and moderate income limit (See Table II-2 below for income limits); or
(iii) Have income eligibility requirements which limit the activity exclusively to low and moderate income persons; or
(iv) Be of such nature and be in such location that it may be concluded that the activity's clientele will primarily be low and moderate income persons; or
(v) An activity that serves to remove material or architectural barriers to the mobility or accessibility of elderly persons or of adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled" will be presumed to qualify under this criterion if it is restricted, to the extent practicable, to the removal of such barriers by assisting: (1) The reconstruction of a public facility or improvement, or portion thereof, that does not qualify as an area benefit activity; or (2) The rehabilitation of a privately owned nonresidential building or improvement that does not qualify as an area benefit activity or a job creation/retention activity; or (3) The rehabilitation of the common areas of a residential structure that contains more than one dwelling unit and that does not qualify as a low and moderate income housing activity.
(vi) Where information on income by family size is required, the subrecipient may substitute evidence establishing that the person assisted qualifies under another program having income qualification criteria at least as restrictive as that used in the CDBG definition of "low and moderate income person" such as Job Training Partnership Act (JTPA) and welfare programs.

c. Housing activities. An eligible activity carried out for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by low- and moderate-income households. This would include, but not necessarily be limited to, the acquisition or rehabilitation of property; conversion of nonresidential structures; and new housing construction. Generally CDBG funds may only be used to undertake new housing construction:
(i) as provided under the last resort housing provisions set forth in 24 CFR part 42;
(ii) as authorized under Sec. 570.201(m) or (n); or
(iii) when carried out by an entity pursuant to Sec. 570.204(a);


d. Job creation or retention activities. An activity designed to create or retain permanent jobs where at least 51 percent of the jobs, computed on a full time equivalent basis, involve the employment of low and moderate income persons.
Table II-1: CDBG Presumed Benefit Income Levels

<table>
<thead>
<tr>
<th>Presumed Category</th>
<th>Beneficiary Income Level for Presumed Category</th>
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</thead>
<tbody>
<tr>
<td>Abused children</td>
<td>Extremely low income</td>
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<tr>
<td>Battered spouses</td>
<td>Low income</td>
</tr>
<tr>
<td>Severely disabled adults</td>
<td>Low income</td>
</tr>
<tr>
<td>Homeless persons</td>
<td>Extremely low income</td>
</tr>
<tr>
<td>Illiterate adults</td>
<td>Low income</td>
</tr>
<tr>
<td>Persons with AIDS</td>
<td>Low income</td>
</tr>
<tr>
<td>Migrant farm workers</td>
<td>Low income</td>
</tr>
<tr>
<td>Elderly (senior center rehab or center based senior services)</td>
<td>Moderate income</td>
</tr>
<tr>
<td>Elderly (non-center based senior services)</td>
<td>Low income</td>
</tr>
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Table II-2: 2015 HUD Income Limits

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<tr>
<th>Income Level</th>
<th>1 person</th>
<th>2 person</th>
<th>3 person</th>
<th>4 person</th>
<th>5 person</th>
<th>6 person</th>
<th>7 person</th>
<th>8 person</th>
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<td>Extremely Low Income (30%)</td>
<td>$17,050.00</td>
<td>$19,500.00</td>
<td>$21,950.00</td>
<td>$24,350.00</td>
<td>$26,750.00</td>
<td>$39,150.00</td>
<td>$41,550.00</td>
<td>$43,950.00</td>
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<tr>
<td>Low Income (50%)</td>
<td>$29,400.00</td>
<td>$32,450.00</td>
<td>$36,500.00</td>
<td>$40,550.00</td>
<td>$44,600.00</td>
<td>$48,650.00</td>
<td>$52,700.00</td>
<td>$56,750.00</td>
</tr>
<tr>
<td>Moderate Income (60%)</td>
<td>$45,450.00</td>
<td>$51,950.00</td>
<td>$58,450.00</td>
<td>$64,950.00</td>
<td>$71,450.00</td>
<td>$77,950.00</td>
<td>$84,450.00</td>
<td>$90,950.00</td>
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2. Activities which aid in the prevention or elimination of slums or blight. Activities meeting one or more of the following criteria, in the absence of substantial evidence to the contrary, will be considered to aid in the prevention or elimination of slums or blight:

a. Activities to address slums or blight on an area basis. An activity will be considered to address prevention or elimination of slums or blight in an area if:

(i) The area, delineated by the subrecipient, meets a definition of a slum, blighted, deteriorated or deteriorating area under State law (P.L. 991) or local law;
(ii) Throughout the area there is a substantial number (at least 25%) of deteriorated or deteriorating buildings, or the public improvements are in a general state of deterioration;
(iii) Documentation is maintained by the subrecipient on the boundaries of the area and the conditions and standards used that qualified the area at the time of its designation; and
(iv) The assisted activity addresses one or more of the conditions which contributed to the deterioration of the area. Rehabilitation of residential buildings carried out in an area meeting the above requirements will be considered to address the area’s deterioration only where each such building rehabilitated is considered substandard under local definition before rehabilitation, and all deficiencies making a building substandard have
been eliminated if less critical work on the building is undertaken. At a minimum, the local
definition for this purpose must be such that buildings that it would render substandard
would also fail to meet the housing quality standards for the Section 8 Housing
Assistance Payments Program-Existing Housing (24 CFR 882.109). The subrecipient
must include the following in its application for funding: (1) the local definition of
"substandard"; (2) a pre-rehabilitation inspection report describing the deficiencies in
each structure to be rehabilitated; and (3) details and scope of CDBG assisted
rehabilitation, by structure.

b. Activities to address slums or blight on a spot basis. Acquisition, clearance,
relocation, historic preservation, remediation of environmentally contaminated properties,
and rehabilitation of building and improvements which eliminate specific conditions of
blight, physical decay, or environmental contamination on a spot basis not located in a
slum or blighted area will meet this objective. Under this criterion, rehabilitation is limited
to the extent necessary to eliminate specific conditions detrimental to public health and
safety. If acquisition or relocation is undertaken, it must be a precursor to another eligible
activity (funded with CDBG or other resources) that directly eliminates the specific
conditions of blight or physical decay, or environmental contamination. The subrecipient
must include the following in its application for funding:
(i) A description of the specific condition of blight or physical decay treated; and
(ii) For rehabilitation carried out under this category, a description of the specific
conditions detrimental to public health and safety which were identified and the details
and scope of the CDBG assisted rehabilitation by structure.

c. Activities to address slums or blight in an urban renewal area. An activity will be
considered to address prevention or elimination of slums or blight in an urban renewal
area if the activity is:
(i) Located within an urban renewal project area or Neighborhood Development Program
(NDP) action area; i.e., an area in which funded activities were authorized under an
urban renewal Loan and Grant Agreement or an annual NDP Funding Agreement,
pursuant to title I of the Housing Act of 1949; and
(ii) Necessary to complete the urban renewal plan, as then in effect, including initial land
redevelopment permitted by the plan. The subrecipient must include in its application for
funding a copy of the Urban Renewal Plan, as in effect at the time the activity is carried
out, including maps and supporting documentation.

3. Activities designed to meet community development needs having a particular
urgency: In the absence of substantial evidence to the contrary, an activity will be
considered to address this objective if the applicant, and subsequently the County, certify
that the activity is designed to alleviate existing conditions which pose a serious and
immediate threat to the health or welfare of the community which are of recent origin or
which recently became urgent, that the applicant and the County are unable to finance the
proposed project with their own revenues, and that other sources of funding have proven to
be unavailable. A condition will generally be considered to be of recent origin if it developed
or became critical within 18 months preceding the CDBG Program application submission
date. In short, to qualify as an Urgent Community Development Need, a project would have

Section II PROGRAMS Page 4
to address a "recent catastrophe" that is beyond the fiscal capability of the applicant and the County. CDBG funds can only be used as absolute funding of last resort.
DETERMINING SERVICE AREAS

As discussed in Chapter 3 under the L/M Income Area Benefit subcategory of the L/M income national objective, once it has been determined that an activity provides a benefit to all the residents of an area, the activity may meet the L/M Income Benefit national objective only if the area served by the activity contains a sufficiently high percentage of L/M income residents. As also noted in that section, accurately determining the area served by the activity is critical for these purposes. This Appendix provides guidance on how to determine the area served by an activity.

Some activity types do not require any judgment in determining the area served for purposes of the CDBG program. This is because the area served by such an activity has already been determined for other purposes. Perhaps most notable among these activities are police precincts, fire stations, and schools. In each such case, specific boundaries have already been determined so that the persons involved know which facility serves persons or properties located at a particular address within the community. When boundaries such as these have been determined, no further work should be needed for purposes of identifying the area served by assisting the facility or providing the service.

Moreover, in many communities the planning department or the department or agency administering a particular facility or service, for their own purposes, establishes service areas for things such as libraries, parks, playgrounds, etc. Again, the decision to assist these services or facilities with CDBG funds should not require any additional work to identify the area to be served.

Generally speaking, it is reasonable to assume that certain kinds of facilities serve only very small areas. For example, sidewalks, gutters, trees, and street lights on a residential street would usually benefit only the residents of the immediately adjacent area. The same would be true for tot-lots and small playgrounds. Therefore, the area served by such activities is usually limited to a few census block groups surrounding the area in which they are located.

When the grantee does not already have an identification of the area served for a given facility or service, it will be necessary for the grantee to determine the service area before CDBG assistance may be provided if the activity is to qualify under the L/M Income Area Benefit criteria. As previously indicated, the grantee’s determination of the area served will usually be accepted by HUD, unless there are indications that the grantee defined area is clearly too small or too large. The factors to be considered in making the determination of the area served (both by the grantee and HUD) for these purposes are:

The nature of the activity;
The location of the activity;
Accessibility issues, and
The availability of comparable activities.
Each of these factors is discussed briefly below.

**Nature of Activity**

In determining the boundaries of the area served by a facility, its size and how it is equipped need to be considered. For example, a park that is expected to serve an entire neighborhood cannot be so small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at any one time. Conversely, a park which contains three ball fields, or a ballfield with grandstands that can accommodate hundreds of spectators, could not reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small, two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons passing through from other areas.

**Location of Activity**

Where an activity is located will also affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. A library, for example, cannot reasonably be claimed to benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhood as well as the one in which it is located. (Note that the grantee may carry out activities that are even outside its jurisdiction if it is done in accordance with §570.309.)

**Accessibility**

The accessibility of the activity also needs to be considered in defining the area served. For example, if a river or an interstate highway forms a geographic barrier that separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in determining the area served. Other limits to accessibility may apply to particular activities. For example, the amount of fees to be charged, the time or duration that an activity would be available, access to transportation and parking, and the distance to be traveled can all constitute barriers to the ability of persons to benefit. Language barriers might also constitute an accessibility issue in a particular circumstance.

**Comparable Activities**

The nature, location, and accessibility of comparable facilities and services must also be considered in defining a service area. In most cases, the service area for one activity should not overlap with that of a comparable activity (e.g., two community centers, two clinics, or two neighborhood housing counseling services).

**"Fit" of Service Area**

Because the regulations require that census data be used to the maximum extent feasible for determining the income of persons residing in service areas, the boundaries of the service area

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Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
determined by the grantee for the activity need to be compared with the boundaries of census divisions (tracts, block groups, etc.). The census divisions that best fall within the service area should be used for defining the service area for purposes of reporting on the activity and for calculating the percentage of L/M income persons residing in that area. While this means that the census divisions chosen for this purpose may exclude some limited number of persons that are in the actual service area or include some who are not, the practicality of using the census data will override unless the proportion of persons so excluded or included is too great. The alternative would be to survey excluded/included persons and to adjust the data obtained from the census computer runs accordingly. Surveys can be quite costly and their use should be limited whenever possible.

Commercial Service Areas

A store will usually be considered to serve an area generally. Where the business itself has had a recent market survey to define the area it serves, it should be used for CDBG purposes. Where it does not have such a survey, an analysis of the location and accessibility of comparable stores should be undertaken to define the area served. When the CDBG assistance provided is not to a particular business but to the shopping center or commercial strip in which it is located (e.g., facade improvements), the area served would be that of the entire center or strip. Again, an analysis of comparable centers/strips should be undertaken in defining the service area. Note that it may not always be possible to determine the area served by a commercial business, such as in the case where the businesses depend on tourists. Moreover, some commercial facilities serve a very broad area (e.g., a regional shopping mall) and the area may be so large an area that it is unlikely to meet the 51% L/M income residents test.
CERTIFICATIONS AND ASSURANCES

The Governing Body Certifies that all the information provided in this application is correct to the best of their knowledge.

Official Resolution
The Governing Body has duly adopted or passed as an official act, a resolution, motion or similar action authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the application to act in connection with the application and to provide such additional information as may be required.

Access to Information
The Governing Body assures that it will give the Department of Housing and Community Development, and the U.S. Department of Housing and Urban Development (HUD), through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the activity; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

Conflict of Interest
The Governing Body certifies that no persons described as an employee, agent, consultant, officer, or elected official or appointed official of the governing body, or of any designated public agencies, or Subrecipients which are receiving funds under a Subrecipient Agreement, who exercise or have exercised any functions or responsibilities with respect to Community Development Block Grant Activities, HOME Activities or Emergency Shelter Activities assisted under a Subrecipient Agreement; or who are 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 themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Nondiscrimination
The Governing Body certifies that it will comply with all Federal Statutes relating to nondiscrimination. 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 USC §§1681-1686), which prohibits discrimination on the basis of sex;
(c) Section 504 of the Rehabilitation Act of 1973, as amended (29 USC §794), which prohibits discrimination on the basis of handicaps;
(d) the Age Discrimination Act of 1975, as amended (42 USC §§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 USC 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 USC §3601 et seq.), as amended, relating to
nondiscrimination in the sale, rental or financing of housing;
(j) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made;
(j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Equal Opportunity
Section 109 of the Housing and Community Development Act of 1974, P.L. 93-383 (42 USC 5309) and the regulations issued pursuant thereto (24 CFR part 570.600), which provide that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds provided under this Part.

Fair Housing
Title VIII of the Civil Rights Act of 1968, as amended by Fair Housing Amendments act of 1988 (42 USC 3601-20) and implementing regulations at 24 CFR part 100, which states that no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability or residential real estate-related transactions; and requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing. Actions that the application or subrecipient undertake to affirmatively further fair housing will be consistent with action identified in any locally adopted fair housing analysis.

Uniform Relocation Assistance
The Governing Body assures that it 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 or federally assisted program. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in the purchase.

Hatch Act
The Governing Body assures that it will comply with the provisions of the Hatch Act (5 USC §§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.

Labor Standards
The Governing Body assures that it will comply, as applicable, with the provision of the Davis-Bacon Act (40 USC §§276a to 276a-7), the Copeland Act (40 USC §276c and 18 USC §874), and the Contract Work Hours and Safety Standard Act (40 USC §§327-333), regarding labor standards for federally assisted construction subagreements.

Environmental Clearance
The Governing Body will comply with the environmental laws and authorities at 24 CFR parts 50 and 58 and will 1) supply the Department of Housing and Community Development with information necessary for it to perform any necessary environmental review of each activity; 2) carry out mitigating measures required by Housing and Community Development; 3) not acquire or otherwise carry out any program activities with respect to any eligible project until Housing and Community Development approval is received.

Release of Funds
The Governing Body acknowledges that receipt of any Grant is subject to the release of funds by the U.S. Department of Housing and Urban Development, and that release of payments will be subject to documenting compliance with all requirements listed in the Grant Agreement to be executed with

Section V CERTIFICATIONS AND ASSURANCES

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
Environmental Standards
The Governing Body assures that it will comply with environmental standards which may be prescribed pursuant to the following:

(a) institution of environmental quality control measures under the Nation 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 floodplain 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 USC §§1451 et seq.);
(f) conformity of Federal actions to State (Clear Air) Implementation Plan under Section 176(c) of the Clean Air Act of 1955, as amended (42 USC §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

Historic Preservation
The Governing Body assures that it will assist in assuring compliance with section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 USC 469a-1 et seq.).

Lead-Based Paint
The Governing Body assures that it comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R, and the Lead-Based Paint Poisoning Prevention Act (42 USC §4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation or residence structures.

Financial Requirements
The Governing Body assures that it will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984.

The Governing Body acknowledges that the Federal Programs will not be responsible for any project costs incurred prior to the full execution of a Subrecipient Agreement.

Procurement
The Governing Body acknowledges that the Office of Housing and Community Development must approve and verify that all procurement requirements have been meet in accordance with the Program Regulations. The Office of Housing and Community Development must approve any purchases or the awards of any contracts to be funded in full or in part with any Federal funds granted through the CDBG Program/ HOME Program or ESG Program;

Other Program Requirements
The Governing Body agrees that implementation of any project funded in full or in part will not proceed without full execution of the program requirements as described in the Subrecipient Agreement.

The Governing Body certifies that it will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.
Lobbying
The Governing Body certifies that to the best of its 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 (n) of this 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;

Section 3
The Governing Body certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135

Excessive Force
The Governing Body 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.

Drug-Free Workplace
The Governing Body certifies that it will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

2. Establishing an ongoing drug-free awareness program to inform employees about -
   (a) The dangers of drug abuse in the workplace;
   (b) The grantee's policy of maintaining a drug-free workplace;
   (c) Any available drug counseling, rehabilitation, and employee assistance programs; and,
   (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

3. Making it a requirement that each employee engaged in the performance of the grant be given a copy of the statement required by paragraph 1;

4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment
under the grant, the employee will:

(a) Abide by the terms of the statement; and
(b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

5. Notifying the agency in writing, within ten calendar days, after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee of the grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:

(a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5, and 6.

8. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here; and

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<th>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</th>
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Section V CERTIFICATIONS AND ASSURANCES
Section VI
APPLICATION INSTRUCTIONS AND REQUIRED FORMS

The following instructions should be used by all applicants seeking grant assistance under these Federal Programs (CDBG, ESG). The Department of Housing and Community Development may request more specific project-related information from an applicant at anytime during the review process.

The applicant must provide a complete description, a detailed budget (Page 7) for the proposed project in the application, and include the appropriate sources and uses form for all funds expected to be available. The application information is the basis for funding consideration. Use the appropriate application form as provided in the “Worksheet” section in the on-line application. Applications must contain all available documentation, which supports the eligibility, feasibility, marketability, and affordability of the proposed projects.

MATCHING FUNDS REQUIREMENT

MUNICIPALITIES
For municipal construction projects, CDBG will reimburse up to 100% of the total construction costs. The municipality will pay any engineering costs as matching funds.

NON-PROFIT ORGANIZATIONS
For CDBG grants a match of funds equal to a minimum of 30% of the project cost is required for non-profit applicants for each proposed project. An exception is allowed for construction projects whereby the applicant has the option to pay all engineering/architectural costs on the project utilizing its own funds. In this case the applicant is required to pay a minimum of 15% of construction costs and can request grant assistance for the remaining 85% of construction costs. The applicant must indicate its option by checking the appropriate box on one of the 2016 Sources and Uses forms contained in this section. For ESG grants a match of 100% is required.

Incomplete, insufficient, or missing information will cause applications to be eliminated from consideration. Please submit typewritten applications on 8 ½ x 11” paper. Each application must contain page numbers and a table of contents. All pages should be three-hole punched along the left margin and clipped into a manila folder. Include the agency name and project name at the top right hand corner of each page of the application.

Only one project application will be accepted from any one municipality and three applications from any one nonprofit organization. The original and one photocopy of the application must be submitted to the Department of Housing and Community Development.

APPLICATIONS MUST BE RECEIVED IN THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT BY 4:15 P.M., FRIDAY, APRIL 15, 2016. NOTE: TRANSMITTALS VIA FACSIMILE (FAX) MACHINE or E-MAIL WILL NOT BE ACCEPTED.
### APPLICATION COVER SHEET

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<th>Brief Project Description</th>
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### Checklist of Required Documents

All applicants must include:  (Check each as included in application)

1. [ ] Application Cover Sheet (This Page)
2. [ ] Application Forms - See Section IV for complete details.
3. [ ] 2016 Sources and Uses Form corresponding to project.
4. [ ] 2016 Detailed Project Costs Form with indication of items to be supported by grant.
5. [ ] Certification and Assurances (Section V) - **Signed - NOTE THE UPDATED CHANGES**
6. [ ] Copy of Board Resolution or Meeting Minutes.
7. [ ] Map showing location of activity and/or street boundary lines of project (as applicable).
8. [ ] Digital photos of building/project front and back of structure/views from four points for proposed acquisition, rehabilitation or construction projects, streets showing deterioration etc.
9. [ ] Include an original and a copy of the entire application, each in a labeled manila folder.

Additionally, all Nonprofit Organizations must include the following:

1. [ ] Certification of nonprofit status (Letter from IRS 501 (c)(3))
2. [ ] Articles of Incorporation
3. [ ] By - Laws
4. [ ] List of current Board of Directors and Officers
5. [ ] Annual Operating Budget
6. [ ] Most recent financial statement and audit
7. [ ] Copy of Deed for the property being rehabilitated (as applicable)
8. [ ] A copy of all in-take documentation used to determine client income.
9. [ ] Job Descriptions of requested staff positions, if any. Identify eligible duties.

And Homeless Applications Must include all attachments noted on the application form.
**2016**

**SOURCES AND USES:**

**Municipal Construction Project**

1) Municipality Name

2) Project Name

3) Chief Elected Official of Applicant/Authority Chairperson  
   (Name, Title, Address, Zip Code, Phone)  

4) Contact Person (Name, Title, Address, Zip Code)

   Contact E-mail:  
   Contact Phone:

5) **SOURCE OF FUNDS**  

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<th>AMOUNT</th>
<th>FUNDING STATUS</th>
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A. County Funds Requested

B. Sources of Match

**NOTE:** For Municipal construction projects CDBG will reimburse up to 100% of the total construction costs. Municipality will pay any engineering costs as matching funds.

1.  
   Secured ☐  
   Pending ☐  
   Date Secured  
   Date Applied  

2.  
   Secured ☐  
   Pending ☐  
   Date Secured  
   Date Applied  

3.  
   Secured ☐  
   Pending ☐  
   Date Secured  
   Date Applied  

4.  
   Secured ☐  
   Pending ☐  
   Date Secured  
   Date Applied  

C. Total Match Funds  
   (Sum of lines B1 to B4 above)

**NOTE:** Must provide copies of commitment letters for each match source indicated as secured.

**TOTAL SOURCES OF FUNDS**  
   (Sum of lines A and C above)

6) **USES FUNDS**  

<table>
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<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
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Acquisition Costs  
Architectural/Engineering  
Construction Costs  
Reconstruction Costs  
Rehabilitation Costs  
Legal/Soft Costs  
Other (Explain)  

**TOTAL**

To the best of my knowledge and belief, data in the proposal are true and correct, submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&CD to do so.

Signature  
CEO/Chairperson/President  
Date

---

*Section VI APPLICATION INSTRUCTIONS AND REQUIRED FORMS  Page 3*
## 2016

**Sources and Uses:**

**Non-Profit Construction Project**

1. **Agency Name:**

2. **Project Name:**

3. **Chief Elected Official/Authority Chairperson/Nonprofit President** (Name, Title, Address, Zip Code, Phone)

4. **Contact Person** (Name, Title, Address, Zip Code)

   - Contact E-mail:
   - Contact Phone:

5. **Source of Funds**

<table>
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<th>Funding Status</th>
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   **A. County Funds Requested**

   **B. Sources of Match**
   
   (Federal, State, Local, Private)

   - 1.
     - Secured [ ] Pending [ ]
     - Date Secured ________ Date Applied ________
   - 2.
     - Secured [ ] Pending [ ]
     - Date Secured ________ Date Applied ________
   - 3.
     - Secured [ ] Pending [ ]
     - Date Secured ________ Date Applied ________
   - 4.
     - Secured [ ] Pending [ ]
     - Date Secured ________ Date Applied ________

   **C. Total Match Funds**
   
   (Sum of lines B1 to B4 above)

   **Total Sources of Funds**
   
   (Sum of lines A and C above)

   **Note:** Most provide copies of commitment letters for each match source indicated as secured.

6. **Uses of Funds**

<table>
<thead>
<tr>
<th>Amount</th>
<th>Comments/Additional Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   **Acquisition Costs**
   
   **Architectural/Engineering**
   
   **Construction Costs**
   
   **Reconstruction Costs**
   
   **Rehabilitation Costs**
   
   **Legal/Soft Costs**
   
   **Other (Explain)**
   
   **Total**

   **To the best of my knowledge and belief, data in the proposal are true and correct; submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MC&CD to do so.**

   ____________________________
   **Signature**

   ____________________________
   **CEO/Chairperson/President**

   ____________________________
   **Date**

---

Section VI  
APPLICATION INSTRUCTIONS AND REQUIRED FORMS  
Page 4
### 2016

**SOURCES AND USES:**

**Public Service Projects**

*Agency Name*

*Project Name*

3) Chief Elected Official of Applicant/Authority Chairperson/Nonprofit President (Name, Title, Address, Zip Code, Phone)

4) Contact Person (Name, Title, Address, Zip Code)

Contact E-mail:

Contact Phone:

### 5) SOURCE OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>FUNDING STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**A. County Funds Requested**

**B. Sources of Match**
*(Federal including FEMA, State, Local, Private)*

1. Secured [ ] Pending [ ]
   - Date Secured: __________  Date Applied: __________

2. Secured [ ] Pending [ ]
   - Date Secured: __________  Date Applied: __________

3. Secured [ ] Pending [ ]
   - Date Secured: __________  Date Applied: __________

4. Secured [ ] Pending [ ]
   - Date Secured: __________  Date Applied: __________

**C. Total Match Funds**
*(Sum of lines B1 to B4 above)*

**TOTAL SOURCES OF FUNDS**
*(Sum of lines A and C above)*

**NOTE:** For Non-construction projects CDBG will reimburse up to 70% of the total costs. Subrecipient must pay a minimum of 30% of project costs as match.

### 6) USES OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Seniors’ Services**

**Child Care Services**

**Legal Services**

**Youth Services**

**Other Public Services (Explain):**

**TOTAL**

To the best of my knowledge and belief, data in the proposal are true and correct. Submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&GD to do so.

__________________________
Signature

__________________________
CEO/Chairperson/President

__________________________
Date

---

*Section VI  APPLICATION INSTRUCTIONS AND REQUIRED FORMS  Page 5*
### 2016

#### SOURCES AND USES:

**Homeless Projects**

1) Agency Name

2) Project Name

3) Chief Elected Official of Applicant/Authority Chairperson/Nonprofit President (Name, Title, Address, Zip Code, Phone)

4) Contact Person (Name, Title, Address, Zip Code)

   Contact E-mail:

   Contact Phone:

5) SOURCE OF FUNDS

   **AMOUNT**

   **FUNDING STATUS**

   **A. County Funds Requested**

   **B. Sources of Match** (Federal including FEMA, State, Local, Private)

   **NOTE:** For homeless projects, the subrecipient must show a 100% match for the funds being requested.

   1.

   2.

   3.

   4.

   **C. Total Match Funds** (Sum of lines B1 to B4 above)

   **TOTAL SOURCES OF FUNDS** (Sum of lines A and C above)

   **NOTE:** Must provide copies of commitment letters for each match source indicated as secured.

6) USES OF FUNDS

   **AMOUNT**

   **COMMENTS/ADDITIONAL INFORMATION**

   Rapid Re-Housing Subsidies

   Prevention Subsidies

   Case Management

   Homeless Shelter Operations

   Homeless Essential Services

   Other (Explain)

   **TOTAL**

To the best of my knowledge and belief, data in the proposal are true and correct. Submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances, and contracts if selected by MCH&OD to do so.

<table>
<thead>
<tr>
<th>Signature</th>
<th>CEO/Chairperson/President</th>
<th>Date</th>
</tr>
</thead>
</table>

---

Section VI  APPLICATION INSTRUCTIONS AND REQUIRED FORMS  Page 6

Annual Action Plan  
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
## Detailed Project Cost Form

For Homeless Projects

1) **Agency Name:**

2) **Project Name:**

<table>
<thead>
<tr>
<th>Positions/Salaries</th>
<th>Project Costs</th>
<th>Costs to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assistant Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Case Managers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other staff</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Employee Benefits:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FICA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Staff Benefits</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Agency Expenses:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shelter Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insurance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Supplies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial Assistance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office Supplies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building Maintenance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building Repairs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counseling Services</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>$</td>
<td></td>
</tr>
</tbody>
</table>

Provide a detailed and accurate cost estimate. Indicate all costs associated with the project including those not financed with county funds. Identify which cost line items are to be supported by county funds.
<table>
<thead>
<tr>
<th>1) Agency Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2) Project Name:</td>
</tr>
<tr>
<td>Contact Person:</td>
</tr>
<tr>
<td>Contact Phone Number:</td>
</tr>
<tr>
<td>Contact e-mail:</td>
</tr>
</tbody>
</table>

Provide a detailed and accurate cost estimate. Indicate all costs associated with the project including those not financed with county funds. Identify which cost line items are to be supported by county funds.
DETAILED PROJECT COST FORM
For Municipal and Public Facilities

1) Agency Name: __________________________

2) Project Name: __________________________

Contact Person: ____________________________
Contact Phone Number: ____________________
Contact e-mail: ____________________________

PROVIDE A DETAILED AND ACCURATE COST ESTIMATE. INDICATE ALL COSTS ASSOCIATED WITH THE PROJECT INCLUDING THOSE NOT FINANCED WITH COUNTY FUNDS. IDENTIFY WHICH COST LINE ITEMS ARE TO BE SUPPORTED BY COUNTY FUNDS.
Section VII

OTHER PROGRAM REQUIREMENTS

§ 570.200 (j) Faith-based Activities

(1) Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the CDBG program. Neither the Federal government nor a State or local government receiving funds under CDBG programs shall discriminate against an organization on the basis of the organization’s religious character or affiliation.

(2) Organizations that are directly funded under the CDBG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the programs or services funded under this part. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under this part, and participation must be voluntary for the beneficiaries of the HUD-funded programs or services.

(3) A religious organization that participates in the CDBG program 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 that it does not use direct CDBG 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 CDBG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, a CDBG-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.

(4) An organization that participates in the CDBG program shall not, in providing program assistance, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion or religious belief.

(5) CDBG funds may not be used for the acquisition, construction, or rehabilitation of structures to the extent that those structures are used for inherently religious activities. CDBG funds may be used for the acquisition, construction, or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. Where a structure is used for both eligible and inherently religious activities, CDBG funds may not exceed the cost of those portions of the acquisition, construction, or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to CDBG funds in this part. Sanctuaries, chapels, or other rooms that a CDBG-funded religious congregation uses as its principal place of worship, however, are ineligible for CDBG-funded improvements. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (see 24 CFR parts 84 and 85).

(6) If a State or local government voluntarily contributes its own funds to supplement federally funded activities, the State or local government has the option to segregate the Federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

§ 570.503 (b)(7) Reversion of assets

The agreement shall specify that upon its expiration the subrecipient shall transfer to the recipient any CDBG funds on hand at the time of expiration and any accounts receivable attributable to the use of CDBG funds. It shall also include provisions designed to ensure that any real property under the subrecipient’s control that was acquired or improved in whole or in part with CDBG funds provided to the subrecipient, in the form of a loan, funds in excess of $25,000 is either:

(i) used to meet one of the national objectives in §570.208 until five years after expiration of the agreement, or such longer period of time as determined appropriate by the recipient; or

(ii) Not used in accordance with paragraph (b)(7)(i) of this section, in which event the subrecipient shall pay to the recipient an amount equal to the current market value of the property less any portion of the value attributable to expenditures of non-CDBG funds for the acquisition of, or improvement to, the property. The payment is program income to the recipient. (No payment is required after the period of time specified in paragraph (b)(7)(i) of this section.)
§ 570.504 Program income
(a) Recording program income. The receipt and expenditure of program income as defined in § 570.500(a) shall be recorded as part of the financial transactions of the grant program.

(b) Disposition of program income received by recipients.

(1) Program income received before grant closeout may be retained by the recipient if the income is treated as additional CDBG funds subject to all applicable requirements governing the use of CDBG funds.

(2) If the recipient chooses to retain program income, that program income shall be disposed of as follows:

(i) Program income in the form of repayments to, or interest earned on, a revolving fund as defined in § 570.500(b), shall be substantially disbursed from such fund before additional cash withdrawals are made from the U.S. Treasury for the same activity. (This rule does not prevent a lump sum disbursement to finance the rehabilitation of privately owned properties as provided for in § 570.513.)

(ii) Substantially all other program income shall be disbursed for eligible activities before additional cash withdrawals are made from the U.S. Treasury.

(3) Program income on hand at the time of closeout shall continue to be subject to the eligibility requirements in subpart C and all other applicable provisions of this part until it is expended.

(4) Unless otherwise provided in any grant closeout agreement, and subject to the requirements of paragraph (b)(5) of this section, income received after closeout shall not be governed by the provisions of this part, except that, if at the time of closeout the recipient has another ongoing CDBG grant received directly from HUD, funds received after closeout shall be treated as program income of the ongoing grant program.

(5) If the recipient does not have another ongoing grant received directly from HUD at the time of closeout, income received after closeout from the disposition of real property or from loans outstanding at the time of closeout shall not be governed by the provisions of this part, except that such income shall be used for activities that meet one of the national objectives in § 570.208 and the eligibility requirements described in section 105 of the Act.

(c) Disposition of program income received by subrecipients. The written agreement between the recipient and the subrecipient, as required by § 570.503, shall specify whether program income received is to be returned to the recipient or retained by the subrecipient. Where program income is to be retained by the subrecipient, the agreement shall specify the activities that will be undertaken with the program income and that all provisions of the written agreement shall apply to the specified activities. When the subrecipient retains program income, transfers of grant funds by the recipient to the subrecipient shall be adjusted according to the principles described in paragraphs (b)(2)(i) and (6) of this section. Any program income on hand when the agreement expires, or received after the agreement’s expiration, shall be paid to the recipient as required by § 570.503(b)(8).

(d) Disposition of certain program income received by urban counties. Program income derived from urban county program activities undertaken by or within the jurisdiction of a unit of general local government which thereafter terminates its participation in the urban county shall continue to be program income of the urban county. The urban county may transfer the program income to the unit of general local government, upon its termination of urban county participation, provided that the unit of general local government has become an entitlement grantee and agrees to use the program income in its own CDBG entitlement program.

§ 570.505 Use of Real Property
The standards described in this section apply to real property within the recipient’s control which was acquired or improved in whole or in part using CDBG funds in excess of $25,000. These standards shall apply from the date CDBG funds are first spent for the property until five years after closeout of an entitlement recipient’s participation in the entitlement CDBG program or, with respect to other recipients, until five years after the closeout of the grant from which the assistance to the property was provided.
(a) A recipient may not change the use or planned use of any such property (including the beneficiaries of such use) from that for which the acquisition or improvement was made unless the recipient provides affected citizens with reasonable notice of, and opportunity to comment on, any such proposed change, and either:

(1) The new use of such property qualifies as meeting one of the national objectives in § 570.208 and is not a building for the general conduct of government; or

(2) The requirements in paragraph (b) are met.

(b) If the recipient determines, after consultation with affected citizens, that it is appropriate to change the use of the property to a use which does not qualify under paragraph (a)(1) of this section, it may retain or dispose of the property for the changed use if the recipient's CDBG program is reimbursed in the amount of the current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, and improvements to, the property.

(c) If the change of use occurs after closeout, the provisions governing income from the disposition of the real property in § 570.504(b)(4) or (b), as applicable, shall apply to the use of funds reimbursed.

(d) Following the reimbursement of the CDBG program in accordance with paragraph (b) of this section, the property no longer will be subject to any CDBG requirements.

§ 570.600 General

(a) This subpart K enumerates laws that the Secretary will treat as applicable to grants made under section 106 of the Act, other than grants to states made pursuant to section 106(d) of the Act, for purposes of the Secretary's determinations under section 104(a)(1) of the Act, including statutes expressly made applicable by the Act and certain other statutes and Executive Orders for which the Secretary has enforcement responsibility. This subpart K applies to grants made under the Insular Areas Program in § 570.405 and § 570.440 with the exception of § 570.612. The absence of mention herein of any other statute for which the Secretary does not have direct enforcement responsibility is not intended to be taken as an indication that, in the Secretary's opinion, such statute or Executive Order is not applicable to activities assisted under the Act. For laws that the Secretary will treat as applicable to grants made to states under section 106(d) of the Act for purposes of the determination required to be made by the Secretary pursuant to section 104(e)(2) of the Act, see § 570.437.

(b) This subpart also sets forth certain additional program requirements which the Secretary has determined to be applicable to grants provided under the Act as a matter of administrative discretion.

(c) In addition to grants made pursuant to section 106(b) and 106(d)(2)(B) of the Act (subparts D and F, respectively), the requirements of this subpart K are applicable to grants made pursuant to sections 107 and 119 of the Act (subparts E and G, respectively), and to loans guaranteed pursuant to subpart M.

§ 570.601 Public Law 88-352 and Public Law 90-284; affirmatively furthering fair housing; Executive Order 11063

Section 104(e)(2) of the Act provides that any grant under section 106 of the Act shall be made only if the grantee certifies to the satisfaction of the Secretary that the grant will be conducted and administered in conformity with Public Law 88-352 and Public Law 90-284 and the grantee will affirmatively further fair housing. Similarly, section 107 provides that no grant may be made under that section (Secretary's Discretionary Fund) or section 119 (UDAG) without satisfactory assurances that the grantee's program will be conducted and administered in conformity with Public Law 88-352 and Public Law 90-284.

(a) "Public Law 88-352" refers to title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), which provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Section 602 of the Civil Rights Act of 1964 directs each Federal department and agency empowered to extend Federal financial assistance to any program or activity by way of grant to effectuate the foregoing prohibition by issuing rules, regulations, or orders of general applicability which shall be consistent with achievement of the statute authorizing the financial assistance. HUD regulations

Section VII OTHER PROGRAM REQUIREMENTS
implementing the requirements of Title VI with respect to HUD programs are contained in 24 CFR Part 1.

(b) "Public Law 90-284" refers to the Fair Housing Act (42 U.S.C. 3601-3620), which states that it is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States and prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including otherwise making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, handicap or familial status. The Fair Housing Act further requires the Secretary to administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of the Fair Housing Act. In accordance with this statutory direction, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner affirmatively to further the policies of the Fair Housing Act; furthermore, section 104(b)(2) of the Act requires that each grantee receiving funds under section 106 of the Act (entitlement or small cities grantees) certify to the satisfaction of the Secretary that it will affirmatively further fair housing.

For each community receiving a grant under subpart D of this part, the certification that the grantee will affirmatively further fair housing shall specifically require the grantee to assume the responsibility for housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records reflecting the analysis and actions in this regard.

(c) Executive Order 11063, as amended by Executive Order 12259, directs the Department to take all action necessary and appropriate to prevent discrimination because of race, color, religion (creed), sex, or national origin, in the sale, leasing, rental, or other disposition of residential property and related facilities (including land to be developed for residential use), or in the use or occupancy thereof, if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants, or contributions agreed to be made by the Federal Government. HUD regulations implementing Executive Order 11063 are contained in 24 CFR Part 107.

§ 570.602 Section 109 of the Act

(a) Section 109 of the Act requires that no person in the United States shall, on the ground of race, color, national origin or sex, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community development funds made available pursuant to the Act. For purposes of this section "program or activity" is defined as any function conducted by an identifiable administrative unit of the recipient, or by any unit of government, subrecipient, or private contractor receiving community development funds or loans from the recipient. "Funded in whole or in part with community development funds" means that community development funds in any amount in the form of grants or proceeds from HUD guaranteed loans have been transferred by the recipient or a subrecipient to an identifiable administrative unit and disbursed in a program or activity. In subsection (b) of this section, "recipient" means recipient as defined in 24 CFR 1.2(1).

(b) Specific discriminatory actions prohibited and corrective actions.

(1) A recipient may not, under any program or activity to which the regulations of this part may apply, directly or through contractual or other arrangements, on the ground of race, color, national origin, or sex:

(i) Deny any individual any facilities, services, financial aid or other benefits provided under the program or activity.

(ii) Provide any facilities, services, financial aid or other benefits which are different, or are provided in a different form, from that provided to others under the program or activity.

(iii) Subject an individual to segregated or separate treatment in any facility in, or in any matter of process related to receipt of any service or benefit under the program or activity.

(iv) Restrict an individual in any way in access to, or in the enjoyment of, any advantage or privilege enjoyed by others in connection with facilities, services, financial aid or other benefits under the
program or activity.

(v) Treat an individual differently from others in determining whether the individual satisfies any admission, enrollment, eligibility, membership, or other requirement or condition which the individual must meet in order to be provided any facilities, services or other benefit provided under the program or activity.

(vi) Deny an individual an opportunity to participate in a program or activity as an employee.

(2) A recipient may not use criteria or methods of administration which have the effect of subjecting persons to discrimination on the basis of race, color, national origin, or sex, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to persons of a particular race, color, national origin, or sex.

(3) A recipient, in determining the site or location of housing or facilities provided in whole or in part with funds under this part, may not make selections of such site or location which have the effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, national origin, or sex, or which have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act and of this section.

(4) (i) In administering a program or activity funded in whole or in part with CDBG funds regarding which the recipient has previously discriminated against persons on the ground of race, color, national origin or sex, or if there is sufficient evidence to conclude that such discrimination existed, the recipient must take remedial affirmative action to overcome the effects of prior discrimination. The word “previously” does not exclude current discriminatory practices.

(ii) In the absence of discrimination, a recipient, in administering a program or activity funded in whole or in part with funds made available under this part, may take any non-discriminatory affirmative action necessary to ensure that the program or activity is open to all without regard to race, color, national origin or sex.

(iii) After a finding of noncompliance or after a recipient has a firm basis to conclude that discrimination has occurred, a recipient shall not be prohibited by this section from taking any action eligible under Subpart C to alleviate an imbalance in services or facilities provided to any geographic area or specific group of persons within its jurisdiction, where the purpose of such action is to remedy prior discriminatory practice or usage.

(5) Notwithstanding anything to the contrary in this section, nothing contained herein shall be construed to prohibit any recipient from maintaining or constructing separate living facilities or rest room facilities for the different sexes. Furthermore, selectivity on the basis of sex is not prohibited when institutional or custodial services can properly be performed only by a member of the same sex as the recipients of the services.

(c) Section 109 of the Act further provides that any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified handicapped person as provided in section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) shall also apply to any program or activity funded in whole or in part with funds made available pursuant to the Act. HUD regulations implementing the Age Discrimination Act are contained in 24 CFR Part 146 and the regulations implementing section 504 are contained in 24 CFR Part 8.

§ 570.603 Labor Standards

(a) Section 110(a) of the Act requires that all laborers and mechanics employed by contractors or subcontractors on construction work financed in whole or in part with assistance received under the Act shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276a-276a-5). By reason of the foregoing requirement, the Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.) also applies. However, these requirements apply to the rehabilitation of residential property only if such property contains not less than 8

Section VII OTHER PROGRAM REQUIREMENTS
units. With respect to the labor standards specified in this section, the Secretary of Labor has the authority and functions set forth in Reorganization Plan Number 14 of 1950 (5 U.S.C. 1332-15) and section 2 of the Act of June 13, 1934, as amended (40 U.S.C. 276c).

(b) Under section 110(b) of the Act the requirements set out in paragraph (a) of this section are inapplicable to individuals who volunteer their services under certain circumstances. Grantees, subrecipients, contractors and subcontractors shall comply with 24 CFR part 70, which sets out the circumstances under which volunteers may be used.

§ 570.604 Environmental Standards
Section 104(g) expresses the intent that "the policies of the National Environmental Policy Act of 1969 and other provisions of law which further the purposes of such Act (as specified in regulations issued by the Secretary)...[be] most effectively implemented in connection with the expenditure of funds under" the Act. Such other provisions of law which further the purposes of the National Environmental Policy Act of 1969 are specified in regulations issued pursuant to section 104(g) of the Act and contained in 24 CFR Part 58. Section 104(g) also provides that, in lieu of the environmental protection procedures otherwise applicable, the Secretary may under regulations provide for the release of funds for particular projects to grantees who assume all of the responsibilities for environmental review, decision making, and action pursuant to the National Environmental Policy Act of 1969, and the other provisions of law specified by the Secretary as described above, that would apply to the Secretary were he/she to undertake such projects as Federal projects. Grantees assume such environmental review, decision making, and action responsibilities by execution of grant agreements with the Secretary. The procedures for carrying out such environmental responsibilities are contained in 24 CFR Part 58.

§ 570.605 National Flood Insurance Program
Section 202(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4106) provides that no Federal officer or agency shall approve any financial assistance for acquisition or construction purposes (as defined under section 3(a) of said Act (42 U.S.C. 400(a))), one year after a community has been formally notified of its identification as a community containing an area of special flood hazard, for use in any area that has been identified by the Director of the Federal Emergency Management Agency as an area having special flood hazards unless the community in which such area is situated is then participating in the National Flood Insurance Program. Notwithstanding the date of HUD approval of the recipient's application (or, in the case of grants made under Subpart D, the date of submission of the grantee's consolidated plan in accordance with 24 CFR part 91), funds provided under this part shall not be expended for acquisition or construction purposes in an area that has been identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards unless the community in which the area is situated is participating in the National Flood Insurance Program in accordance with 44 CFR Part 59-79, or less than a year has passed since FEMA notification to the community regarding such hazards, and flood insurance is obtained in accordance with section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001).

§ 570.608 Displacement, Relocation, Acquisition and Replacement of Housing.
(a) General policy for minimizing displacement. Consistent with the other goals and objectives of this part, grantees shall assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of activities assisted under this part.

(b) Relocation assistance for displaced persons at URA levels.

(1) A displaced person shall be provided with relocation assistance at the levels described in, and in accordance with the requirements of, 49 CFR part 24 which contains the government-wide regulations implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U.S.C. 4601-4655).

(2) Displaced person.

(i) For purposes of this paragraph (b), the term "displaced persons" means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of rehabilitation, demolition, or acquisition for an activity assisted under this part. A permanent
involuntary move for an assisted activity includes a permanent move from real property that is made:

(A) After notice by the grantee to move permanently from the property, if the move occurs after the initial official submission to HUD for grant, loan, or loan guarantee funds under this part that are later provided or granted.

(B) After notice by the property owner to move permanently from the property, if the move occurs after the date of the submission of a request from financial assistance by the property owner (or person in control of the site) that is later approved for the requested activity.

(C) Before the date described in paragraph (b)(2)(i)(A) or (B) of this section, if either HUD or the grantee determines that the displacement directly resulted from acquisition, rehabilitation, or demolition for the requested activity.

(D) After the initiation of negotiations, if the person is the tenant-occupant of a dwelling unit and any one of the following three situations occurs:

(1) The tenant has not been provided with a reasonable opportunity to lease and occupy a suitable decent, safe, and sanitary dwelling in the same building/complex upon the completion of the project under reasonable terms and conditions, including a monthly rent that does not exceed the greater of the tenant's monthly rent and estimated average utility costs before the initiation of negotiations or 30 percent of the household's average monthly gross income; or

(2) The tenant is required to relocate temporarily for the activity but

(i) The tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporary location and any increased housing costs, or other conditions of the temporary relocation are not reasonable and

(ii) the tenant does not return to the building/complex; or

(3) The tenant is required to move to another unit in the building/complex, but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move.

(ii) Notwithstanding the provisions of paragraph (b)(2)(i) of this section, the term Adisplaced personDis not include:

(A) A person who is evicted for cause based on serious or repeated violations of material terms of the lease or occupancy agreement. To exclude a person on this basis, the grantee must determine that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance under this section;

(B) A person who moves into the property after the date of the notice described in paragraph (b)(2)(i)(A) or (B) of this section, but who received a written notice of the expected displacement before occupancy;

(C) A person who is not displaced as described in 49 CFR 24.2(g)(2).

(D) A person who the grantee determines is not displaced as a direct result of the acquisition, rehabilitation, or demolition for an assisted activity. To exclude a person on this basis, HUD must concur in that determination.

(iii) A grantee may, at any time, request HUD to determine whether a person is a displaced person under this section.
(3) Initiation of negotiations. For purposes of determining the type of replacement housing assistance to be provided under this paragraph, if the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of real property, the term "initiation of negotiations" means the execution of the grant or loan agreement between the grantee and the person owning or controlling the real property.

(c) Residential antidisplacement and relocation assistance plan. In accordance with section 104(d) of the Act, each grantee must adopt, make public, and certify that it is following a residential antidisplacement and relocation assistance plan providing one-for-one replacement units (paragraph (c)(1) of this section), and relocation assistance (paragraph (c)(2) of this section). The plan shall also indicate the steps that will be taken consistent with other goals and objectives of this part to minimize the displacement of families and individuals from their homes and neighborhoods as a result of any activity assisted under this part.

(1) One-for-one replacement of low/moderate income dwelling units.

(i) All occupied and vacant occupiable low/moderate-income dwelling units that are demolished or converted to a use other than as low/moderate-income dwelling units in connection with an activity assisted under this part must be replaced with low/moderate income dwelling units.

(ii) Replacement low/moderate income dwelling units may be provided by governmental agencies or private developer, and must meet the following requirements.

(A) The units must be located within the grantee's jurisdiction. To the extent feasible and consistent with other statutory priorities, the units shall be located within the same neighborhood as the units replaced.

(B) The units must be sufficient in number and size to house no fewer than the number of occupants who could have been housed in the units that are demolished or converted. The number of occupants who could have been housed in units shall be determined in accordance with applicable local housing occupancy codes. The grantee may not replace those units with smaller units (e.g., 2-bedroom unit with two 1-bedroom units), unless the grantee has provided the information required under paragraph (c)(1)(i)(G) of this section.

(C) The units must be provided in standard condition. Replacement low/moderate income dwelling units may include units that have been raised to standard from substandard condition if

(1) no person was displaced from the unit as a direct result of an assisted activity (see definition of displaced person in Paragraph (c)(3)(i) of this section) and

(2) the unit was vacant for at least three months before execution of the agreement between the grantee and the property owner.

(D) The units must initially be made available for occupancy at any time during the period beginning one year before the grantee's submission of the information required under paragraph (c)(1)(ii) of the section and ending three years after the commencement of the demolition or rehabilitation related to the conversion.

(E) The units must be designed to remain low/moderate income dwelling units for at least 10 years from the date of initial occupancy. Replacement low/moderate-income dwelling units may include, but are not limited to, public housing, or existing housing receiving Section 8 project-based assistance under the United States Housing Act of 1937.

(iii) Before the grantee enters into a contract committing it to provide funds under this part for any activity that will directly result in the demolition of low/moderate-income dwelling units or the conversion of low/moderate-income dwelling units to another use, the grantee must make public, and submit the...
following information in writing to HUD:

(A) A description of the proposed assisted activity;

(B) The location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low/moderate-income dwelling units as a direct result of the assisted activity;

(C) A time schedule for the commencement and completion of the demolition or conversion;

(D) The location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data are not available at the time of the general submission, the submission shall identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific location and number of dwelling units by size shall be submitted and disclosed to the public as soon as it is available.

(E) The source of funding and a time schedule for the provision of replacement dwelling units;

(F) The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy.

(G) Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g., 2-bedroom unit with a 1-bedroom unit) is consistent with the needs analysis contained in the HUD-approved CHAS. A grantee that is not required to submit a Housing Assistance Plan to HUD must submit information demonstrating that the proposed replacement is consistent with the housing needs of low and moderate income households in the jurisdiction.

(iv) The one for one replacement requirements of paragraph (c)(1) of this paragraph does not apply to the extent Field Office determines, based upon objective data, that there is an adequate supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis within the grantee’s jurisdiction. In making this determination, the HUD will consider whether the demolition or conversion of the low/moderate income dwelling units will have a material impact on the ability of low and moderate income household to find suitable housing. HUD will consider relevant evidence of housing supply and demand including, but not limited to the following factors: the housing vacancy rate for the jurisdiction, the number of vacant low/moderate-income dwelling units in the jurisdiction (excluding units that will be demolished or converted) and the number of eligible families on waiting lists for housing assistance under the United States Housing Act of 1937 in the jurisdiction; the needs analysis contained in any applicable HUD-approved CHAS; and relevant part or predicted demographic changes.

(B) HUD may consider the supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis in an area that is larger than the grantee’s jurisdiction. Such additional dwelling units shall be considered if the Field Office determines that the units would be suitable to serve the needs of the low- and moderate-income households that could be served by the low/moderate-income dwelling units that are to be demolished or converted to another use. HUD will base this determination on geographic and demographic factors, such as location and access to places of employment and to other facilities.

(C) The grantee must submit a request for a determination under paragraph (c)(1)(iv) directly to the Field Office. Simultaneously with the submission of the request, the grantee must make the submission public and inform interested persons that they have 30 days from the date of submission to provide to HUD additional information supporting or opposing the request.

(2) Relocation assistance under section 104(d) of the Act. Under section 104(d), each displaced person: 
(defined in paragraph (c)(3)(ii) of this section) is entitled to choose to receive either assistance at URA levels (see Paragraph (b) of this section) or the following relocation assistance:

(i) Advisory services at the levels described in 49 CFR Part 24, subpart C (General Relocation Requirements). Tenants shall be advised of their rights under the Fair Housing Act (42 U.S.C. 3601-19) and of replacement housing opportunities in such a manner that, to the extent feasible, will provide a choice between relocating within their neighborhoods and other neighborhoods consistent with the grantee's responsibility to affirmatively further fair housing;

(ii) Payment for moving expenses at the levels described in 49 CFR Part 24, subpart D.

(iii) The reasonable and necessary cost of any security deposit required to rent the replacement dwelling unit, and for credit checks required to rent or purchase the replacement dwelling unit.

(iv) Interim living costs. The grantee shall reimburse a person for actual reasonable out-of-pocket costs incurred in connection with temporary relocation, including moving expenses and increased housing costs, if:

(A) the person must relocate temporarily because continued occupancy of the dwelling unit constitutes a substantial danger to the health or safety of the person of the public, or

(B) the person is displaced from a Low/moderate income dwelling units, none of the comparable replacement dwelling units to which the person has been referred qualifies as a low/moderate income dwelling (defined in paragraph (c)(3)(ii) of this section), and a suitable low/moderate income dwelling unit is scheduled to become available in accordance with paragraph (c)(1) of this section. (Because a comparable replacement dwelling unit may be made affordable to a person through a rental assistance payment and its market rent may exceed the Fair Market Rent (FM) under the Section 8 Existing Housing Program, it may not meet the definition of a Low/moderate income dwelling units.)

(v) Replacement housing assistance. Persons are eligible to receive one of the following two forms of replacement housing assistance:

(A) Each person must be offered rental assistance equal to 60 times the amount necessary to reduce the monthly rent and estimated average monthly cost of utilities for a replacement dwelling (comparable to a rent or decent, safe, and sanitary replacement dwelling to which the person relocates, whichever costs less) to the AECH Payment as determined under 3813.107 of this title. All or a portion of this assistance may be offered through a certificate or housing voucher for rental assistance (if available) provided through the Local Public Agency (PHA) under Section 8 of the United States Housing Act of 1937. If a Section 8 certificate or housing voucher is provided to a person, the grantee must provide referrals to comparable replacement dwelling units where the owner is willing to participate in the Section 8 Existing Housing Program. To the extent that cash assistance is provided, it may, at the discretion of the grantee, be in either a pump sum or in installments.

(B) If the person purchases an interest in a housing cooperative or mutual housing association and occupies a decent, safe and sanitary unit in the cooperative or association, the household may elect to receive a lump sum payment. This lump sum payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the AECH Tenant Payment as determined under 3813.107 of this title, from the monthly rent and estimated average monthly cost of utilities at a comparable replacement dwelling. To compute the capitalized value, the installments shall be discounted at the rate of interest paid on passbook savings deposits by a federally-insured bank or savings and loan institution conducting business within the grantee’s jurisdiction. To the extent necessary to minimize hardship to the household, the grantee shall, subject to appropriate safeguards, issue a payment in advance of the purchase of the interest in the housing cooperative or mutual housing association.

(C) Displaced low/moderate income tenants shall be advised of their right to elect relocation assistance pursuant to the Uniform Relocation Assistance and Real Property acquisition Policies Act of 1970 and
the regulations appearing at 49 CFR part 24 as an alternative to the relocation assistance available under paragraph (c)(2) of this section.

(3) Definitions. For purposes of providing section 104(d) assistance under the paragraph (c):

(i) "Comparable replacement dwelling unit" The term "comparable replacement dwelling unit" means a dwelling unit that:

(A) Meets the criteria of 24 CFR 24.2(d)(1) through (6); and

(b) Is available at a monthly cost for rent plus estimated average monthly utility costs that does not exceed the "Total Tenant Payment" determined under §913.107 of this title, after taking into account any rental assistance the household would receive.

(ii) Displaced person.

(A) The term "displaced person" means any low/moderate income family or individual that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of the conversion of a low/moderate income dwelling unit (defined in paragraph (c)(3)(iv) of this section) or demolition in connection with an activity assisted under this part. A permanent involuntary move for an assisted activity includes a permanent move from real property that is made:

(1) After notice by the grantee to move permanently from the property, if the move occurs after the initial official submission to HUD for grant, loan, or loan guarantee funds under this part that are later provided or granted

(2) After notice by the property owner, to move permanently from the property, if the move occurs after the date of submission of a request for financial assistance by the property owner (or person in control of the site) that is later approved for the requested activity.

(3) Before the date described in paragraph (c)(3)(ii)(A)(1) or (2) of this section, if either HUD or the grantee determines that the displacement directly resulted from the conversion of a low/moderate-income dwelling unit or demolition in connection with the requested activity.

(4) After the execution of the agreement by the grantee covering the rehabilitation or demolition, if the person is the tenant-occupant of a dwelling unit and any one of the following three situations occurs:

(i) The tenant has not been provided with a reasonable opportunity to lease and occupy a suitable decent, safe, and sanitary dwelling in the same building/complex upon completion of the project, under reasonable terms and conditions, including a monthly rent that does not exceed the greater of the tenant's monthly rent and estimated average utility costs before the execution of such agreement, or the "Total Tenant Payment" for the person as determined under §913.107 of this title; or

(ii) The tenant, required to relocate temporarily for the activity, does not return to the building/complex and either the tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary location (including the cost of moving to and from the temporary location and any increased housing costs), or other conditions of the temporary relocation are not reasonable, or

(iii) The tenant is required to move to another unit in the building/complex, but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move.

(b) Notwithstanding the provisions of paragraph (c)(3)(ii)(A) of this section, the term "displaced person"
does not include:

(1) A person who is evicted for cause based upon serious or repeated violations of material terms of the lease or occupancy agreement. To exclude a person on this basis, the grantee must determine that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance under this section.

(2) A person who moves into the property after the date of the notice described in paragraph (c)(3)(i)(A)(1) or (2) of this section, but received a written notice of the expected displacement before commencing occupancy.

(3) A person who is not displaced as defined under 49 CFR 24.2(g)(2).

(4) A person who the grantee determines is not displaced as a direct result of the conversion of a low/moderate-income dwelling or demolition in connection with an assisted activity. To exclude a person on this basis, HUD must concur in that determination.

(5) A grantee may, at any time request HUD to determine whether a person is a displaced person under this paragraph (c).

(iii) Low/moderate-income dwelling unit. The term “low/moderate-income dwelling unit” means a dwelling unit with a market rent (including utility costs) that does not exceed the applicable Fair Market Rent (FMR) for existing housing established under 24 CFR Part 888, except that the term does not include a unit that is owned and occupied by the same person before and after the assisted rehabilitation.

(iv) Standard condition and substandard condition suitable for rehabilitation. If the grantee has a HUD-approved Consolidated Plan the definitions of “standard condition” and “substandard condition suitable for rehabilitation” established in the plan will apply.

(v) Vacant occupiable dwelling unit. The term “vacant occupiable dwelling unit” means a vacant dwelling unit that is in a standard condition, a vacant dwelling unit that is in a substandard condition, but is suitable for rehabilitation, or a dwelling unit in any condition that has been occupied (except by a squatter) at any time within the period beginning one year before the date of execution of the agreement by the grantee covering the rehabilitation or demolition.

(d) Optional relocation assistance.

Under section 105(a)(11) of the Act the grantee may provide relocation payments and other relocation assistance to persons displaced by activities that are not subject to paragraph (b) or (c) of this section. The grantee may also provide relocation assistance to persons receiving assistance under paragraphs (b) or (c) of this section at levels in excess of those required by these paragraphs. Unless such assistance is provided under State or local law, the grantee shall provide such assistance only upon the basis of a written determination that the assistance is appropriate (see 24 CFR 570.201(a)). The grantee must adopt a written policy available to the public that describes the relocation assistance that the grantee has elected to furnish and provides for equal relocation assistance within each class of displaced persons.

(e) Acquisition of real property.

The acquisition of real property for an assisted activity is subject to 49 CFR Part 24, subpart B.

(f) Appeals.

If a person disagrees with the grantee’s determination concerning the person’s eligibility for, or the amount of, a relocation payment under this section, the person may file a written appeal of that determination with the grantee. The appeal procedures to be followed are described in 49 CFR 24.10. In addition, a low- or moderate-income household that has been displaced from a dwelling may file a written request for review of the grantee’s decision to the HUD Field Office.
(g) Responsibility of grantee.

(1) The grantee is responsible for ensuring compliance with the requirements of this section, notwithstanding any third party's contractual obligation to the grantee to comply with the provisions of this section.

(2) The cost of assistance required under this section may be paid from local public funds, funds provided under this part, or funds available from other sources.

(3) The grantee must maintain records in sufficient detail to demonstrate compliance with the provisions of this section.

§ 570.607 Employment and Contracting Opportunities

(a) Grantees shall comply with Executive Order 11246, as amended by Executive Order 12086 and 12107, and the implementing regulations issued pursuant thereto (41 CFR Chapter 60) which provide that no person shall be discriminated against on the basis of race, color, religion, sex, or national origin in all phases of employment during the performance of Federal or federally assisted construction contracts. As specified in Executive Order 11246 and the implementing regulations, contractors and subcontractors on Federal or federally assisted construction contracts shall take affirmative action to ensure fair treatment in employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay, or other forms of compensation and selection for training and apprenticeship.

(b) Grantees shall comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and the implementing regulations in 24 CFR part 135. Section 3 requires that employment and other economic opportunities arising in connection with housing rehabilitation, housing construction, or other public construction projects, shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be given to low and very low income persons.

§ 570.608 Lead-based Paint

(a) Prohibition against the use of lead-based paint. Section 401(b) of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846) directs the Secretary to prohibit the use of lead-based paint on structures constructed or rehabilitated with Federal assistance. Such prohibitions are contained in 24 CFR Part 35, Subpart B, and are applicable to residential structures constructed or rehabilitated with assistance provided under this part.

(b) Notification of hazards of lead-based paint poisoning.

(1) The Secretary has promulgated requirements regarding notification to purchasers and tenants of HUD-associated housing constructed prior to 1978 of the hazards of lead-based paint poisoning at 24 CFR Part 35, Subpart A. This paragraph is promulgated pursuant to the authority granted in 24 CFR 35.5(c) and supersedes, with respect to all housing to which it applies, the notification requirements prescribed by Subpart A of 24 CFR Part 35.

(2) For properties constructed prior to 1978, applicants for rehabilitation assistance provided under this part and tenants or purchasers of properties owned by the grantee or its subrecipient and acquired or rehabilitated with assistance provided under this part shall be notified:

(i) That the property may contain lead-based paint;

(ii) of the hazards of lead-based paint;

(iii) of the symptoms and treatment of lead-based poisoning;

(iv) of the precautions to be taken to avoid lead-based paint poisoning (including maintenance and removal techniques for eliminating such hazards);

(v) of the advisability and availability of blood lead level screening for children under seven years of age; and...
that in the event lead-based paint is found on the property, appropriate abatement procedures may be undertaken.

(c) Elimination of lead-based paint hazards. The purpose of this paragraph is to implement the provisions of section 302 of the Lead-Based Paint Poisoning Prevention Act, 42 U.S.C. 4802, by establishing procedures to eliminate as far as practicable the hazards due to the presence of paint which may contain lead and to which children under seven years of age may be exposed in existing housing which is rehabilitated with assistance provided under this part. The Secretary has promulgated requirements regarding the elimination of lead-based paint hazards in HUD-associated housing at 24 CFR Part 35, Subpart C. This paragraph is promulgated pursuant to the authorization granted in 24 CFR 35.24(b)(4) and supersedes, with respect to all housing to which it applies, the requirements prescribed by Subpart C of 24 CFR Part 35.

(1) Applicability. This paragraph applies to the rehabilitation of applicable surfaces in existing housing which is assisted under this part. The following activities assisted under the Community Development Block Grant program are not covered by this paragraph:

(i) Emergency repairs (not including lead-based paint-related emergency repairs);

(ii) weatherization;

(iii) water or sewer hook-ups;

(iv) installation of security devices;

(v) facilitation of tax exempt bond issuances which provide funds for rehabilitation;

(vi) other similar types of single-purpose programs that do not include physical repairs or remodeling of applicable surfaces (as defined in 24 CFR 35.22) of residential structures; and

(vii) any non-single purpose rehabilitation that does not involve applicable surfaces (as defined in 24 CFR 35.22) that does not exceed $3,000 per unit.

(2) Definitions. - Applicable surface. All intact and nonintact interior and exterior painted surfaces of a residential structure.

Chewable surface. All chewable protruding painted surfaces up to five feet from the floor or ground, which are readily accessible to children under seven years of age, e.g., protruding corners, window sills and frames, doors and frames, and other protruding woodwork.

Defective paint surface. Paint on applicable surfaces that is cracking, scaling, chipping, peeling or loose.

Elevated blood lead level or EBL. Excessive absorption of lead, that is, a confirmed concentration of lead in whole blood of 25 mcg/dl (micrograms of lead per deciliter of whole blood) or greater.

Lead-based paint surface. A paint surface, whether or not defective, identified as having a lead content greater than or equal to 1 mg/cm².

(3) Inspection and Testing

(i) Defective paint surfaces. The grantee shall inspect for defective paint surfaces in all units constructed prior to 1978 which are occupied by families with children under seven years of age and which are proposed for rehabilitation assistance. The inspection shall occur at the same time the property is being inspected for rehabilitation. Defective paint conditions will be included in the work write-up for the remainder of the rehabilitation work.

(ii) Chewable surfaces. The grantee shall be required to test the lead content of chewable surfaces if the
family residing in a unit, constructed prior to 1978 and receiving rehabilitation assistance, includes a child under seven years of age with an identified EBL condition. Lead content shall be tested by using an X-ray fluorescence analyzer (XRF) or other method approved by HUD. Test readings of 1 mg/cm\(^2\) or higher using an XRF shall be considered positive for presence of lead-based paint.

(ii) Abatement without testing. In lieu of the procedures set forth in paragraph (c) (3) (i) of this section, in the case of a residential structure constructed prior to 1978, the grantee may forgo testing and abate all applicable surfaces in accordance with the methods set out in 24 CFR 35.24(b) (2) (i).

(4) Abatement Actions.

(i) For inspections performed under § 570.608(c) (3) (i) and where defective paint surfaces are found, treatment shall be provided to defective areas. Treatment shall be performed before final inspection and approval of the work.

(ii) For testing performed under § 570.608(c) (3) (ii) and where interior chewable surfaces are found to contain lead-based paint, all interior chewable surfaces in any affected room shall be treated. Where exterior chewable surfaces are found to contain lead-based paint, the entire exterior chewable surface shall be treated. Treatment shall be performed before final inspection and approval of the work.

(iii) When weather prohibits repainting exterior surfaces before final inspection, the grantee may permit the owner to abate the defective paint or chewable lead-based paint as required by this section and agree to repaint by a specified date. A separate inspection is required.

(5) Abatement methods. At a minimum, treatment of the defective areas and chewable lead-based paint surfaces shall consist of covering or removal of the painted surface as described in 24 CFR 35.24(b)(2)(i).

(6) Funding for inspection, testing and abatement. Program requirements and local program design will determine whether the cost of inspection, testing or abatement is to be borne by the owner/developer, the grantee or a combination of the owner/developer and the grantee.

(7) Tenant protection. The owner/developer shall take appropriate action to protect tenants from hazards associated with abatement procedures. Where necessary, these actions may include the temporary relocation of tenants during the abatement process. The owner/developer shall notify the grantee of all such actions taken.

(8) Records. The grantee shall keep a copy of each inspection and/or test report for at least three years.

(9) Monitoring and enforcement. HUD field office monitoring of rehabilitation programs includes reviews for compliance with applicable program requirements for lead-based paint. The CFD Field Monitoring Handbook which currently includes instructions for monitoring lead-based paint requirements will be amended as appropriate. In cases of noncompliance, HUD may impose conditions or sanctions on grantees to encourage prompt compliance.

(10) Compliance with other program requirements, Federal, State and local laws.

(i) Other program requirements. To the extent that assistance from any of the programs covered by this section is used in conjunction with other HUD program assistance which have lead-based paint requirements which may have more or less stringent requirements, the more stringent requirements will prevail.

(ii) HUD responsibility. If HUD determines that a State or local law, ordinance, code or regulation provides for lead-based paint testing or hazard abatement in a manner which provides a level of protection from the hazards of lead-based paint poisoning at least comparable to that provided by the requirements of this section and that adherence to the requirements of this subpart would be duplicative or otherwise cause inefficiencies, HUD may modify or waive the requirements of this section in such manner as may be appropriate to promote efficiency while ensuring such comparable level of protection.
(ii) Grantee responsibility. Nothing in this section is intended to relieve any grantee in the programs covered by this section of any responsibility for compliance with State or local laws, ordinances, codes or regulations governing lead-based paint testing or hazard abatement.

(iv) Disposal of lead-based paint debris. Lead-based paint and defective paint debris shall be disposed of in accordance with applicable Federal, State or local requirements. (See, e.g., 40 CFR Parts 260 through 271.)

§ 570.609 Use of Debarred, Suspended, or Ineligible Contractors or Subrecipients.
Assistance under this part shall not be used directly or indirectly to employ, award contracts to, or otherwise engage the services of, or fund any contractor or subrecipient during any period of debarment, suspension, or placement in ineligibility status under the provisions of 24 CFR Part 5.

§ 570.610 Uniform Administrative Requirements and Cost Principles
The recipient, its agencies or instrumentalities, and subrecipients shall comply with the policies, guidelines, and requirements of 24 CFR parts 85 and OMB Circulars A-87, A-110 (implemented at 24 CFR part 84), A-122, A-133 (implemented at 24 CFR part 45), and A-126 (implemented at 24 CFR part 44), as applicable, as they relate to the acceptance and use of Federal funds under this part. The applicable sections of 24 CFR parts 84 and 85 are set forth at §570.602.

§ 570.611 Conflict of Interest
(a) Applicability

(1) In the procurement of supplies, equipment, construction, and services by recipients and by subrecipients, the conflict of interest provisions in 24 CFR 85.35 and 24 CFR 84.42, respectively, shall apply.

(2) In all cases not governed by 24 CFR 85.35 and 24 CFR 84.42, the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient or by its subrecipients to individuals, businesses, and other private entities under eligible activities that authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to §§570.202, 570.203, or 570.204; 570.205, or 570.206 (i)).

(b) Conflicts prohibited. The general rule is that no persons described in paragraph (c) of this section who exercise any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter. For the UDAG program, the above restrictions shall apply to all activities that are a part of the UDAG project, and shall cover any such financial interest or benefit during, or at any time after, such persons' tenure.

(c) Persons covered. The conflict of interest provisions of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds under this part.

(d) Exceptions. Upon the written request of the recipient, HUD may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it has satisfactorily met the threshold requirements of §570.208(1) of this section, taking into account the cumulative effects of paragraph (d)(2) of this section.

(1) Threshold requirements. HUD will consider an exception only after the recipient has provided the following documentation:

7 See footnote 1 for §570.200(a)(5).
(i) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(ii) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

(2) Factors to be considered for exceptions. In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d)(1) of this section, HUD shall conclude that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

(i) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(ii) Whether an opportunity was provided for open competitive bidding or negotiation;

(iii) Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

(iv) Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision making process with respect to the specific assisted activity in question;

(v) Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;

(vi) Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

(vii) Any other relevant considerations.

§ 570.612 Executive Order 12372
(a) General. Executive Order 12372, Intergovernmental Review of Federal Programs, and the Department's implementing regulations at 24 CFR Part 52, allow each State to establish its own process for review and comment on proposed Federal financial assistance programs.

(b) Applicability. Executive Order 12372 applies to the CDBG Entitlement program and the UDAG program. The Executive Order applies to all activities proposed to be assisted under UDAG. It applies to the Entitlement program only where a grantee proposes to use funds for the planning or construction (reconstruction or installation) of water or sewer facilities. Such facilities include storm sewers as well as all sanitary sewers, but do not include water and sewer lines connecting a structure to the lines in the public right-of-way or easement. It is the responsibility of the grantee to initiate the Executive Order review process if it proposes to use its CDBG or UDAG funds for activities subject to review.

§ 570.613 Eligibility restrictions for certain resident aliens.
(a) Restriction. Certain newly legalized aliens, as described in 24 CFR part 49, are not eligible to apply for benefits under covered activities funded by the programs listed in paragraph (e) of this section. "Benefits" under this section means financial assistance, public services, jobs and access to new or rehabilitated housing and other facilities made available under covered activities funded by programs listed in paragraph (e) of this section. "Benefits" do not include relocation services and payments to which displaces are entitled by law.

(b) Covered activities. "Covered activities" under this section means activities meeting the requirements of §570.208(a) that either:
(1) Have income eligibility requirements limiting the benefits exclusively to low and moderate income persons; or

(2) Are targeted geographically or otherwise to primarily benefit low and moderate income persons (excluding activities serving the public at large, such as sewers, roads, sidewalks, and parks), and that provide benefits to persons on the basis of an application.

(c) Limitation on coverage. The restrictions under this section apply only to applicants for new benefits not being received by covered resident aliens as of the effective date of this section.

(d) Compliance. Compliance can be accomplished by obtaining certification as provided in 24 CFR 49.20.

(e) Programs affected.

(1) The Community Development Block Grant program for small cities, administered under subpart F of part 570 of this title until closeout of the recipient's grant.

(2) The Community Development Block Grant program for entitlement grants, administered under subpart D of part 570 of this title.

(3) The Community Development Block Grant program for States, administered under subpart I of part 570 of this title until closeout of the unit of general local government's grants by the State.

(4) The Urban Development Action Grants program, administered under subpart G of part 570 of this title until closeout of the recipient's grant.

§ 570.614 Architectural Barriers Act and the Americans with Disabilities Act
(a) The Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157) requires certain Federal and Federally funded buildings and other facilities to be designed, constructed, or altered in accordance with standards that insure accessibility to, and use by, physically handicapped people. A building or facility designed, constructed, or altered with funds allocated or reallocated under this part after December 11, 1990, and that meets the definition of "residential structure" as defined in 24 CFR 40.2 or the definition of "building" as defined in 41 CFR 101-19.602(a) is subject to the requirements of the Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157) and shall comply with the Uniform Federal Accessibility Standards (appendix A to 24 CFR part 40 for residential structures, and appendix A to 41 CFR part 101-19, subpart 101-19.6, for general type buildings)

(b) The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218 and 225) (ADA) provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, State and local government services, and telecommunications. It further provides that discrimination includes a failure to design and construct facilities for first occupancy no later than January 26, 1993 that are readily accessible to and usable by individuals with disabilities. Further, the ADA requires the removal of architectural barriers and communication barriers that are structural in nature in existing facilities, where such removal is readily achievable— that is, easily accomplishable and able to be carried out without much difficulty or expense.
Geographic Distribution of Projects FY 2016 Formula Grant Projects

Montgomery County, Pennsylvania - Non-Profits

Undisclosed, Non-Site-Specific or Widely-Impact Projects:
Shelters and transitional housing facilities and services, fair housing services, Senior Services, homelessness prevention, rapid rehousing, renourishing, countywide owner housing rehabilitation, CHDO operating funds, administration, home buyers program, and legal services.

<table>
<thead>
<tr>
<th>County</th>
<th>Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Wide</td>
<td>Child, Home and Community Wages for case managers</td>
</tr>
<tr>
<td>Norristown</td>
<td>Laurel House: Wages and a relief pool for staff positions</td>
</tr>
<tr>
<td>Norristown</td>
<td>Resources for Human Development: Case Management</td>
</tr>
<tr>
<td>Norristown</td>
<td>Resources for Human Development: Shelter Operations</td>
</tr>
<tr>
<td>Norristown</td>
<td>Salvation Army: Norristown Shelter Operations: Norristown Family Residence</td>
</tr>
<tr>
<td>Pottstown</td>
<td>Salvation Army: Pottstown Shelter Operations</td>
</tr>
<tr>
<td>Saucon</td>
<td>Keystone Opportunity Center: Case Management (Essential Services)</td>
</tr>
<tr>
<td>Swampscott</td>
<td>Keystone Opportunity Center: Shelter Operations &amp; Homeless Households</td>
</tr>
<tr>
<td>Upper Dublin</td>
<td>Upper Dublin Education Foundation: North Hills Education &amp; Recreation Program</td>
</tr>
</tbody>
</table>
Geographic Distribution of Projects FY 2016 Formula Grant Projects

Montgomery County, Pennsylvania - Municipalities

Unicephed, Non-Site Specific or Wider Impact Projects:
- Shelters and transitional housing facilities and services, fair housing services, Senior Supportive, homelessness prevention, rapid rehousing, general countywide owner housing rehabilitation, OCHD operating funds, administration, homebuyers program, and legal services.

1. Ambler
   North Bethlehem Pike Sidewalk Installation
2. Bridgeport
   Streets Rehabilitation
3. Chestnut Hill
   Laketown Community Center Rehabilitation
4. East Greenville
   Cherry Street Improvements
5. Hatfield
   Bailey Road Sidewalk Installation
6. Hatford
   Centennial Park and Sanitary Sewer Rehabilitation Project
7. Jenkintown
   Borough-wide ABR Curb Ramps
8. Lansdale
   3rd and 4th Street Improvements Phase I
9. Lower Pottsgrove
   Gravel Creek Park Trail and Parking Lot ABR
10. Perkasie
    1st Street Improvements Phase III
11. Perkasie
    Laurel Street Flooding Mitigation
12. Royersford
    Church Street Road Improvements
13. Sellersville
    Main Street Phase II Sidewalk Improvements
14. Southington
    Montgomery Avenue Curb and Sidewalk Improvements
15. Springfield
    Brocklube Road Curb Improvements Phase II
16. Telford
    Borough-wide ABR Curb Ramps
17. West Pottsgrove
    School Lane Improvements Project
Geographic Distribution of Projects FY 2016 Formula Grant Projects

Montgomery County, Pennsylvania - Housing Rehabilitation Non-Profits

Housing Rehabilitation and Administration: Shelters and transitional housing facilities and services, fair housing services, Senior Homemakers, homelessness prevention, rapid rehousing.Genesis countywide owner housing rehabilitation, CHDO operating funds, administration, home buyers program, and legal services.

- County Wide: Genesis Housing Corp; Countywide Owner-occupied Rehab program
- County Wide: Housing & Community Development Administration
- Fort Washington: Housing Equality Center, Fair Housing Compliance
Geographic Distribution of Projects FY 2016 Formula Grant Projects

Montgomery County, Pennsylvania - ESG & HOME Programs

Unsolicited, Non-Site-Specific or Wide-Impact Projects:
Shelters and transitional housing facilities and services, fair housing services, Senior Supportive, homelessness prevention, rapid re-housing, Ginnie M. housing/over housing rehabilitation, CDBG operating funds, administration, home buyers program, and legal services.

ESG Programs:
1. Flourtown - North Bethlehem Pike Sidewalk Installation
2. Norristown - Streets Rehabilitation
3. Norristown - Lawncrest Community Center Rehabilitation
4. Pottstown - Pottstown Cluster of Religious Communities: Rapid Re-Housing and Case Management

HOME Programs:

<table>
<thead>
<tr>
<th>COUNTY WIDE</th>
<th>Organization/Project</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Valley Youth House Committee, Inc. TBRA</td>
</tr>
<tr>
<td>East Norriton</td>
<td>Resources for Human Development: Rehemodeling</td>
</tr>
<tr>
<td>Radnor</td>
<td>Advanced Living: Staley Gardens House CDBG Operating</td>
</tr>
<tr>
<td>Norristown</td>
<td>Casa de los Ancianos Housing Corporation: CDBG Operating</td>
</tr>
<tr>
<td></td>
<td>Welke Housing TBRA</td>
</tr>
<tr>
<td>Pottstown</td>
<td>Gemeinde Housing Corporation: Acquisition/Rehabilitation</td>
</tr>
<tr>
<td>Upper Dublin</td>
<td>North Hills Manor Housing: UH Demolition and New Construction</td>
</tr>
<tr>
<td>Upper Pottsgrove</td>
<td>Delaware Valley Development Co. Crossroads Apartments</td>
</tr>
<tr>
<td>Springfield</td>
<td>Brockville Road Drainage Improvements: Phase III</td>
</tr>
<tr>
<td>Telford</td>
<td>Borough-wide ABR/Dub Ramps</td>
</tr>
<tr>
<td>West Pottsgrove</td>
<td>School Lane Improvements Project</td>
</tr>
</tbody>
</table>

Annual Action Plan
2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
August 10, 2016

Mr. Nachi O. Byman
Director, CPD Office
U.S. Department of Housing & Urban Development
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380

Dear Mr. Byman:

RE: 2016 Annual Action Plan

Enclosed are the original SF 424 forms for Montgomery County’s 2016 Annual Action Plan for the upcoming fiscal year 2016-2017.

These forms have also been uploaded and submitted on IDIS together with the Annual Action Plan.

Kindly note that these forms have been submitted to your office by August 15, 2016 in accordance to the prescribed HUD regulations.

Please contact me with any questions or concerns.

Sincerely:

[Signature]

Emma W. Hertz
Administrator
**Application for Federal Assistance SF 424**

1. Type of Submission:  
   - [ ] New  
   - [ ] Application  
   - [ ] Changed/Corrected Application

2. Type of Application:  
   - [ ] [ ]

3. Date Received:  
   - [ ] 8/17/2016

4. Applicant Identifier:  
   - [ ] P-16-007-09-0037

5a. Federal Entity Identifier:  
   - [ ] 12-40-67-0015

5b. Federal Award Identifier:  
   - [ ] 12-60-55-0035

6. State Use Only:
   - [ ] Date Received by State:  
   - [ ] State Application Identifier:  

8. Applicant Information:
   - [ ] Legal Name:  
   - [ ] Business Name:  

9a. Employer/Taxpayer Identification Number (EIN/TIN):  
   - [ ] 205098850001

9b. Organization DBA:  
   - [ ]

9c. Organization EIN:  
   - [ ] 205098850001

9d. Address:
   - [ ] Street:  
   - [ ] City:  
   - [ ] State:  
   - [ ] Zip/Postal Code:  

9e. Department/Agency:
   - [ ] Name:  
   - [ ] Title:  

10. Name and Contact Information of Person to be Notified on Matters Involving this Application:
   - [ ] First Name:  
   - [ ] Last Name:  
   - [ ] Title:  
   - [ ] Organization/Agency:  

   - [ ] Telephone Number:  
   - [ ] Fax Number:  

   - [ ] Email:  

---

**Annual Action Plan**

**2016**
## Annual Action Plan 2016

### Application for Federal Assistance SF-424

#### 15. Congressional Districts Of:
- *A: Applicant*: 2, 6, 7
- *P: Program/Project*: 2, 6, 7

#### 17. Proposed Project:
- *A. Start Date*: 02/02/2016
- *B. End Date*: 07/31/2017

#### 16. Estimated Funding (in $):
- **Total**: 3,000,480.00

#### 19. Is Application Subject to Review By State Under Executive Order 13572 Process?
- [ ] a. Title application was made available to the State under the Executive Order 13572 Process for review
- [ ] b. Program is subject to E.O. 13572 but has not been selected by the State for review
- [X] c. Program is not covered by E.O. 13572

#### 28. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment)
- [ ] Yes
- [X] No

#### 29. By signing this application, I certify (1) 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 certifications** and agree to comply with any recording forms or acceptance and terms as in the award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to civil, criminal, or administrative penalties (U.S. Code, Title 31, Section 655)

** I AGREE

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

#### Authorized Representative:
- **Name:**
- **Middle Name:**
- **Last Name:**
- **Suffix:**
- **Title:**
- **Telephone Number:** 610-370-3564
- **Email:** cccct@holyoke.org
- **Signature of Authorized Representative:**

### OMB Control No: 2506-0117 (exp. 07/31/2015)
### Application for Federal Assistance SF-424

#### 1. Type of Submission:
- [ ] Proapplication
- [ ] New
- [x] Application
- [ ] Continuation
- [ ] Revision

#### 2. OMB Control No.
- [ ] 2506-0117 (exp. 07/31/2015)
- [ ] [Other (Specify):]

#### 3. Federal Entity Identifier
- [ ] [Identifiers:]

#### 4. State Application Identifier
- [ ] [Identifiers:]

#### 5. A. Legal Name
- [ ] [Organizational Name:]

#### 6. Employer/Employee Identification Number (EIN/SSN)
- [ ] [EIN/SSN:]

#### 7. Address:
- [ ] [Street:]
- [ ] [City:]
- [ ] [State:]
- [ ] [ZIP Code:]

#### 8. Organizational Unit
- [ ] [Department Name:]
- [ ] [Title:]
- [ ] [Organizational Affiliation:]

#### 9. Name and contact information of person to be contacted on matters involving this application:
- [ ] [Name:]
- [ ] [Title:]
- [ ] [Telephone Number:]
- [ ] [Facsimile Number:]
- [ ] [E-mail:]

---

**Annual Action Plan**

**2016**

OMB Control No: 2506-0117 (exp. 07/31/2015)
<table>
<thead>
<tr>
<th><strong>Type of Applicant</strong></th>
<th><strong>Applicant Type</strong></th>
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<tbody>
<tr>
<td>County Government</td>
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| **Other (specify)** |                   |

<table>
<thead>
<tr>
<th><strong>Name of Federal Agency</strong></th>
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<tbody>
<tr>
<td>Housing and Urban Development</td>
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<table>
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<tr>
<th><strong>Catalog of Federal Domestic Assistance Number</strong></th>
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<td>FNSA: TBA</td>
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<table>
<thead>
<tr>
<th><strong>Title</strong></th>
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<tr>
<td>Emergency Solutions Grants Program</td>
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<table>
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<tr>
<th><strong>Competition Identification Number</strong></th>
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<table>
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<tr>
<th><strong>Areas Affected by Project (Cities, Counties, States, etc.)</strong></th>
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</table>

<table>
<thead>
<tr>
<th><strong>Descriptive Title of Applicant's Project</strong></th>
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</thead>
<tbody>
<tr>
<td>Emergency Solutions Grant Program - activity to provide funding for Emergency Housing and homeless persons. Specific activities identified in the FY 2016 Annual Action Plan.</td>
</tr>
</tbody>
</table>

Attach supporting documents as specified in agency instructions.
## Annual Action Plan

**2016**

**OMB Control No: 2506-0117 (exp. 07/31/2015)**

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### Application for Federal Assistance SF-424

**15. Congressional Districts Of:**

- **15a. Applicant:** [ ]
- **15b. Project/Program:** [ ]

**16. Estimated Funding (0):**

- **16a. Federal:**
- **16b. Applicant:**
- **16c. Sub:**
- **16d. Other:**
- **16e. Program/Project:**
- **16f. TOTAL:**

**17. Proposed Project:**

- **17a. Start Date:** [ ]
- **17b. Completion:** [ ]

**18. 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.
- [ ] b. Program is not covered by E.O. 12372.
- [ ] c. Program is not covered by any Executive Order.

**19. Is Applicant Delinquent on Any Federal Debt? (If Yes, provide explanation in attachment.)**

- [ ] Yes [ ] No

**20. 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 assurance and agree to comply with any scheduling terms. Failure to meet terms or requirements may subject me to civil, civil, or administrative penalties.**

**21. Approve as to Form**

[Approval Stamp]

---

### Application Signature

**Authorized Representative**

**First Name:** [ ]

**Last Name:** [ ]

**Middle Initial:** [ ]

**Signature:** [ ]

**Date Signed:** [ ]

---

**Phone Number:** [ ]

**Fax Number:** [ ]

**E-mail:** [ ]

---

**OMB Control No: 2506-0117 (exp. 07/31/2015)**
**Application for Federal Assistance SF-424**

<table>
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<th>Field</th>
<th>Value</th>
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<td>2. Type of Proposal</td>
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<td>5a. Federal Entity Identifier</td>
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<tr>
<td>5b. Federal Award No./E.O.</td>
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<tr>
<td>6. Date Received by State</td>
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<td>7. State Application Number</td>
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<td>8. Applicant Information</td>
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<tr>
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<td>City: Little Rock</td>
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<td>County: Pulaski</td>
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<td></td>
<td>State: AR</td>
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<td>13. Fax Number</td>
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<td>14. Email Address</td>
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<td>15. Name and contact information of person to be consulted on matters involving this application</td>
<td>First Name: John</td>
</tr>
<tr>
<td></td>
<td>Last Name: Doe</td>
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<tr>
<td></td>
<td>Title: Manager</td>
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<td>16. Signature</td>
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**Annual Action Plan**

2016

OMB Control No: 2506-0117 (exp. 07/31/2015)
### Application for Federal Assistance SF-424

<table>
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<td>County Government</td>
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<td>17. Type of Applicant 2: Select Applicant Type:</td>
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<td>18. Name of Federal Agency:</td>
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<td>21. Catalog of Federal Domestic Assistance Number:</td>
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<td>27. Descriptive Title of Applicant's Project:</td>
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<td>28. OMB Grant Program:</td>
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**Annual Action Plan 2016**

OMB Control No: 2506-0117 (exp. 07/31/2015)
Annual Action Plan

OMB Control No: 2506-0117 (exp. 07/31/2015)
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 this 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 forceeds Act of 1970, as amended, and implementing regulations at 49 CFR 26f, and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 199(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, or 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 comply, and submit Standard Form 177, "Disclosure Report of 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 levels (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 laws (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 HPFWA funds are consistent with the strategic plan.

Section 3 — It will comply with section 2 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authentic Official  Date 10-14-16

APPROVED AS TO FORM

Montgomery County Solicitor’s Office
Specific CDBG Certifications:

The Fulfillment Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 51.105.

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 24 570.3).

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 an 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 the current grant year, 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 funds, by assessing any amount against property 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 accepted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within the jurisdiction.
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 3600-3619), and implementing regulations.

Lead-Based Paint — Its 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 — It will comply with applicable laws.

[Signature/Authorized Official]  [Date]

Chair

Title

APPROVED AS TO FORM

[Stamp: Solicitor's Office]
OPTIONAL CERTIFICATION

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which 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 to meet such needs.

NOT APPLICABLE

Signature/Authorized Official    Date

Title
Specific HOME Certifications:

The HOME participating jurisdiction certifies that:

Tenant-Based Rental Assistance -- if the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction’s consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it 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, it 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]

[Chard]  [Title]

APPROVED AS TO FORM

[Stamp] Montgomery County Solicitor's Office
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 as 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 procedures 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

Chair

Title

8-10-

Date
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. 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 1507, 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.