

**Substantial Amendment to the State of Florida's FFY 2019 Annual Action Plan
to Include Community Development Block Grant Coronavirus (CDBG-CV) Funding**

Public Comment Draft July 21, 2020

Executive Summary

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

1. Introduction

The state of Florida is eligible to receive grant funds from the U.S. Department of Housing and Urban Development (HUD) to address housing and community development needs. These different grant funds include: Small Cities Community Development Block Grant (CDBG) Program, Housing Opportunities for Persons with AIDS (HOPWA) Program, Emergency Solutions Grant (ESG) Program, HOME Partnerships Program and the National Housing Trust Fund (NHTF) Program.

Each of the agencies listed below receives funds directly from HUD for the implementation and administration of the following programs:

- CDBG Program – the Florida Department of Economic Opportunity (DEO);
- HOPWA Program - the Florida Department of Health (DOH);
- ESG Program- the Florida Department of Children and Families (DCF); and
- HOME and NHTF Programs - the Florida Housing Finance Corporation (FHFC).

The state of Florida's Annual Action Plan is for a one-year period from July 1, 2019, through June 30, 2020.

The needs assessment and market analysis sections of the Consolidated Plan (ConPlan) determine the priority housing and non-housing development needs within the state. The strategic plan section describes the strategies that will be undertaken and the goals achieved to address the priority needs over the Consolidated Plan's five-year timeframe. An emphasis is placed on meeting priority needs based on housing, homelessness, HOPWA, community and economic development projects that are eligible for funds through the programs administered by the HUD-funded agencies. The fifth-year Action Plan describes the activities that will be undertaken in the fifth year to address the priority needs and marking progress toward meeting the strategic plan's goals.

The amended 2019 Action Plan reflects additional CDBG funds (CDBG-CV) received as part of the federal Coronavirus Aid, Relief and Economic Security (CARES) Act.

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.

All HUD-funded projects must meet one of three National Objectives:

- Primarily benefit low- and moderate-income persons;
- Prevent or eliminate slum or blight; or
- Meet other community development needs that address an urgent need to existing conditions posing a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

The highest priority for the CDBG Program are the following:

- Job creation;
- Flood and drainage (stormwater) improvements;
- Street and sidewalk improvements;
- Sewer line and treatment plant improvements;
- Water line and treatment plant improvements; and
- Rehabilitate low-income homes to meet local building code and Section 8 housing quality standards

Priorities for the CDBG-CV Program include the following:

- **Technical assistance and planning;**
- **Economic development;**
- **Public improvements;**
- **Public services; and**
- **Other eligible activities based on assessed need.**

The highest priority projects for the HOPWA Program are the following:

- Short-term rent, mortgage and utility (STRMU) payments;
- Tenant-based rental assistance (TBRA);
- Permanent housing placement (PHP) activities;
- Resource identification services;
- Supportive services;
- Short-term transitional housing; and

- Grantee and project sponsor’s administrative services.

The highest priority projects for the HOME Program is the following:

- Production of affordable rental housing, provision of rental assistance and homebuyer assistance.

The highest priority in the NHTF Program is:

- Production of affordable rental housing for extremely low-income (ELI) households.

The highest priority projects for the ESG Program are the following:

- Outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individual needs;
- Operation and maintenance for emergency shelters and transitional housing facilities; and
- Rapid re-housing activities for homeless persons (especially persons that are chronically homeless, families with children, veterans and unaccompanied youth) to make the transition to permanent housing and self-sufficiency.

3. Evaluation of past performance

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

As required by HUD, the state must submit a Consolidated Annual Performance and Evaluation Report (CAPER) each year in September. The CAPER details funding expenditures for a given program year and compares actual performance outcomes to those proposed in the Action Plan.

The 2017 CAPER may be found on <http://www.floridajobs.org/CAPER>.

The 2017 CAPER reported that the HOME Program expected to produce 210 rental units and 50 homeownership units in 2017. So far, the HOME program has produced 92 homeownership units in FY 2017 and approved 481 rental units for financing.

In 2017, Florida Housing awarded seven new construction rental developments totaling 34 NHTF units \$6.410 million funding.

Community Development Needs	Need Priority	Anticipated Number of Projects to be Funded 2011-2015	Projects Completed Through 2015

Community Centers/Neighborhood Facilities	Moderate	3	1
Parks and/or Recreation Facilities	Moderate	5	12
Other Public Facilities (Police and Fire Stations, Jails, Emergency Shelters, Treatment Plants, City Halls) Note: Some of the facilities identified as priority needs are not eligible under the CDBG program.	Moderate	5	4
Flood & Drainage Improvements/Stormwater	High	10	19
Street Improvements/Road Paving	High	20	28
*Sidewalks	Moderate	*	6
Sewer/Water Hookups	High	5	14
Water/Sewer Line Improvements	High	57	112
Commercial/Industrial Rehabilitation	High	15	25
Commercial/Industrial Infrastructure	Moderate	25	33

Table 1 - Priority CDBG Needs

***Sidewalks**

Sidewalk improvements are normally included in projects for street improvements or commercial-industrial rehabilitation.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Florida followed its Citizen Participation Plan during the development of the 2019 plan. A notice was published in the Florida Administrative Register (FAR) announcing the initial work group meeting and the public hearing. The work group meeting took place on April 12, 2019, and the public hearing took place on May 13, 2019. The notice was posted to the department's website and emailed to eligible applicants and interested parties. The comment period began on April 12, 2019 and ended on May 13, 2019.

The CDBG-CV notice was posted to the DEO's website and emailed to approximately 1,000 eligible applicants and interested parties. The comment period began on July 21, 2020 and ended on July 28, 2020.

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.

The following is a summary of the public comments received at the public meetings held during the citizen participation process for the development of the 2019 Annual Action Plan.

Public meeting comments:

- No public comments were received.

The following is a summary of the public comments received during the public hearing and the 7-day comment period for the Substantial Amendment to the 2019 Annual Action Plan.

Public comment period comments:

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

No public comments were received.

7. Summary

There continues to be a need for:

- Infrastructure projects in the communities that receive funding through the CDBG Program;
- Financial and supportive assistance to persons with AIDS to help with housing costs to prevent homelessness through the HOPWA Program;
- New affordable housing, homebuyer or rental assistance through the HOME Program;
- Assistance for individuals experiencing homelessness, including funding for the operation and maintenance of emergency shelters through the ESG Program; and
- Extremely low-income units for persons and households with special needs, or who are homeless or at risk of homelessness through the NHTF Program.

PR-05 Lead & Responsible Agencies - 91.300(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Florida	Department of Economic Opportunity (DEO)
HOPWA Administrator	Florida	Department of Health (DOH)
HOME Administrator	Florida	Florida Housing Finance Corporation (FHFC)
ESG Administrator	Florida	Department of Children and Families (DCF)
HTF Administrator	Florida	Florida Housing Finance Corporation (FHFC)

Table 2 – Responsible Agencies

Narrative

None.

Consolidated Plan Public Contact Information

Craig Reynolds, DOH, HOPWA, craig.reynolds@flhealth.gov
 Nicole Gibson, FHFC, HOME and NHTF, nicole.gibson@floridahousing.org Erik
 Braun, DCF, ESG, erik.braun@myflfamilies.com
[CDBG Program, DEO, cdbg@deo.myflorida.com](mailto:cdbg@deo.myflorida.com)

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

In an effort to expand traditional outreach methods from past Citizen Participation Plan processes, the state of Florida developed a formal outreach plan, in collaboration with partner agencies and consultant teams, before beginning the citizen participation process. The statewide outreach plan included a database of more than 250 stakeholders from the local government land use planning contacts, private- sector stakeholders, general public, nonprofit organizations, grant program project sponsors and social services providers who provide information about current housing and community development needs. The database was used to notify the contacts about public meetings. Also, the Consolidated Plan survey was sent to the contacts on the database.

The Consolidated Plan survey allows respondents to identify specific housing and community development needs, as well as identify public services for homeless persons and special needs persons in their communities. Hard copies of the Consolidated Plan survey were distributed at each of the five scheduled public meetings, formatted for online submittal through the website www.surveymonkey.com and posted on DEO's website from the beginning of the Consolidated Plan process, through the end of the 30-day comment period, on June 25, 2015. The Consolidated Plan survey results will be one of the tools, along with public comments received during the five public meetings, to determine the final goals, objectives and funding amounts designated by the state of Florida as priorities for the 2015-2019 Consolidated Plan period.

The five public meetings were held in Tallahassee, Ft. Lauderdale, Jacksonville, Lake City and Bartow. The public meetings were conducted in government-owned facilities that were easily accessible to all segments of the population, including persons with disabilities or persons with language barriers. The public meetings were formally advertised in the FAR at least 15 days prior to the beginning of the meeting dates. All meeting dates, location information and handouts were emailed to the database contacts at least five days prior to the meetings. Reminder emails were also sent to the contacts one day prior to the meetings.

When HUD announced that the states would begin to receive NHTF Program funds starting in 2016, FHFC planned and held two public meetings, the first on February 24, 2016, in Tampa and the second on April 28, 2016, both in-person in Tallahassee and via statewide telephonic conference. The final draft plan was published online to allow a noticed 30-day public comment period, ending on July 28, 2016.

The final public hearing was held on July 28, 2016, in Tallahassee and also was made available via statewide telephonic conference. The meetings were advertised in the Florida Administrative Register and notices were emailed to five extensive listservs covering all local community development and housing departments, the rental development community and stakeholders representing and working with extremely low income, homeless and special needs populations.

In coordination with DEO, FHFC, DOH and DCF, the state surveyed program administrators and stakeholders about housing and community development needs, including impacts of the COVID-19 pandemic. The survey was emailed to over 3,000 stakeholders in June and July 2020.

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

The HOPWA Program contractually requires each sub-recipient to designate a representative to participate in the local homelessness planning process and provide local homelessness advocates with information about HOPWA as needed. By coordinating HOPWA services through Health Resources and Services

Administration (HRSA) funded Ryan White Part B consortia and planning bodies, HOPWA clients are afforded access to supportive services funds under Ryan White Part B and state general revenue programs including, but not limited to, medical care, transportation, insurance, dental, counseling services, housing assistance and emergency financial assistance.

FHFC is working with its partner state agencies, DCF, Elder Affairs, Veterans Affairs and the Agency for Health Care Administration to develop linkages between affordable rental housing and access to supportive services. Florida Housing issued three Requests for Applications (RFA) in 2017 for the development of permanent supportive housing for people with special needs.

As discussed below, the state's Council on Homelessness provides important opportunities for agencies, stakeholders and housing providers to work together. In addition, FHFC requires 5 percent of units financed to serve families and elders to be set aside for persons who are receiving community-based supportive services and are referred by a local supportive services lead agency that is recognized by the corporation for this purpose.

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

The HOPWA Program contractually requires each sub-recipient to designate a representative to participate in the local homelessness planning process and provide local homelessness advocates with information about HOPWA as needed.

The DCF Office on Homelessness works closely with the Florida Coalition for the Homeless (who represents the 27 Continuums of Care [CoCs]) to address the needs of different homeless populations throughout the state. \$3 million in state funding was appropriated to support the operation of the continuums to ensure local planning, data collection and grant writing capacity to enable our communities to continue to access federal housing grants to re-house the state's chronic, long-term homeless population.

DEO and FHFC sit on the Council on Homelessness along with a number of other state agencies and stakeholders to discuss homeless housing and service issues. FHFC uses its seat on the council to seek input on program ideas, including the use of Low Income Housing Tax Credits and state or HOME funding for permanent supportive housing developments to serve homeless persons, a "rapid re-housing" approach with short-term tenant-based rental assistance and the use of forgivable state loans in rural areas working with CoCs to finance smaller, scattered site properties for chronically or situational homeless households. The council provides an important opportunity to discuss how the corporation can support the CoC work to serve homeless people throughout the state.

Describe consultation with the Continuum(s) of Care that serves the State 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 DCF Office on Homelessness gathers input from CoCs regarding performance standards and outcome measures for all funding. This information is used in shaping solicitations for funds available to the HUD-designated CoC Lead Agencies. In the ESG solicitation, CoCs are encouraged to develop projects that meet the local needs that fall within the federal regulations.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 3 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	DEPARTMENT OF ECONOMIC OPPORTUNITY (STATE OF FLORIDA)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section AP-15.
2	Agency/Group/Organization	Florida Department of Health-Central
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Other government - State
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section AP-15.
3	Agency/Group/Organization	FLORIDA HOUSING FINANCE CORPORATION

Agency/Group/Organization Type	Housing Services - Housing Other government - State
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	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Housing Trust Fund (HTF)
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section AP-15.
4	Agency/Group/Organization	Florida Department of Children and Families
	Agency/Group/Organization Type	Services-Children Services-homeless Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section AP-15.

Identify any Agency Types not consulted and provide rationale for not consulting

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Not applicable	CoCs and the State Office on Homelessness closely follow federal policy and work to align efforts in ending homelessness that match the federal strategic plan to end homelessness.
Local Comprehensive Plan	Department of Economic Opportunity	CDBG applications must include provisions from the local comprehensive plan demonstrating the proposed activity is not inconsistent with the comprehensive plan.

Table 4 - Other local / regional / federal planning efforts

Narrative

None.

AP-12 Participation - 91.115, 91.300(c)

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

In an effort to expand traditional outreach methods from past Citizen Participation Plan processes, the state of Florida developed a formal outreach plan, in collaboration with partner agencies and consultant teams, before beginning the citizen participation process. The statewide outreach plan included a database of more than 250 stakeholders from the local government land use planning contacts, private-sector stakeholders, general public, nonprofit organizations, grant program project sponsors and social services providers who provided information about current housing and community development needs.

The database was used to notify the contacts about public meetings. The Consolidated Plan survey was also sent to the contacts in the database.

The state of Florida surveyed respondents to identify the specific housing and community development needs, as well as public services for homeless persons and special needs persons in their communities. Hard copies of the Consolidated Plan survey were distributed at each of the five scheduled public meetings, formatted for online submittal through the website www.surveymonkey.com and posted on DEO’s website from the beginning of the Consolidated Plan process, through the end of the 30-day comment period, on June 25, 2015. The Consolidated Plan survey results, along with public comments received during the five public meetings, the public hearing and comments received during the 30-day comment period, were used to determine the final goals, objectives and funding amounts designated by the state of Florida as priorities for the 2015-2019 Consolidated Plan period.

When HUD announced that the states would begin to receive NHTF Program funds starting in 2016, FHFC planned and held two public meetings, the first on February 24, 2016, in Tampa and the second on April 28, 2016, in Tallahassee and also via statewide telephonic conference. After the final draft plan was published online to allow a noticed 30-day public comment period, ending on July 28, 2016, the final public hearing was held on July 28, 2016, in Tallahassee and was made available via statewide telephonic conference. The meetings were advertised in the Florida Administrative Register and notices were emailed to five extensive listservs covering all local community development and housing departments, the rental development community and stakeholders representing and working with extremely low-income, homeless and special needs populations.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	No public citizens attended the public meeting on July 28, 2016.	Comment received from the Florida Coalition for the Homeless. Please refer to the public comment and summary attachment.	Please refer to the public comment and summary attachment.	
<u>2</u>	Public Meeting and Public Notice with minimum 5-day comment period	Non-targeted/broad community				

Table 5 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

Response exceeds number of allowable characters, please refer to Unique Appendices.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	-Acquisition; -Admin and Planning; -Economic Development; -Housing; -Public Improvements; -Public Services.	27,511,368	72,500	0	27,583,868	27,583,868	The annual allocation and any program income or prior year resources will be allocated to eligible CDBG categories per 24 CFR 570.200-570.207

CDBG-CV Round One	Public-federal	Acquisition; Administration, Technical Assistance and Planning; Economic Development; Public Improvements; Public Services; and other eligible activities.	16,660,264			16,660,264	16,660,264	The CDBG-CV Round One allocation will be allocated to eligible CDBG-CV categories.
CDBG-CV Round Two	Public-federal	Acquisition; Administration, Technical Assistance and Planning; Economic Development; Public Improvements; Public Services; and other eligible activities.	63,170,132			63,170,132	63,170,132	The CDBG-CV Round Two allocation will be allocated to eligible CDBG-CV categories.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
			\$	\$	\$	\$	\$	

HOME	public - federal	-Acquisition; -Homebuyer assistance; -Homeowner rehab; -Multifamily rental new construction; -Multifamily rental rehab; -New construction for ownership; -TBRA.	17,881,000	7,000,000	0	24,881,000	24,881,000	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR 92
HOPWA	public - federal	-Permanent housing in facilities; -Permanent housing placement; -Short term or transitional housing facilities; -STRMU; -Supportive services; -TBRA.	7,748,771	0	0	7,748,771	7,748,771	The annual allocation and any program income or prior year resources will be allocated to eligible HOPWA categories per 24 CFR 574

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

ESG	public - federal	-Conversion and rehab for transitional housing; -Financial Assistance; -Overnight shelter; -Rapid re-housing; -Rental Assistance Services; -Transitional housing.	5,500,348	0	0	5,500,348	5,500,348	The annual allocation and any program income or prior year resources will be allocated to eligible ESG categories per 24 CFR 576.101-576.107
HTF	public - federal	-Acquisition; -Admin and Planning; -Homebuyer assistance; -Multifamily rental new construction; -Multifamily rental rehab; -New construction for ownership.	9,414,324	0	0	9,414,324	9,414,324	The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93.

Table 6 - 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

Response exceeds number of allowed characters, please refer to Unique Appendices.

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

Land owned by the local government can be used for leverage in the CDBG Program. In addition, land donated or provided at below market value to a developer receiving HOME or NHTF funds will lower the overall cost of affordable housing development.

Discussion

In conclusion, the anticipated resources expected to be allocated toward eligible HUD-funded program activities and projects will be used toward priority areas that have been identified by each funding program in the current planning years 2015-2019. All or a portion of the FFY 19 CDBG funding may be made available to support the state of Florida's response to COVID-19. Activities funded will meet one of the three National Objectives. Other resources available from other funding sources are encouraged to supplement HUD-funded activities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Economic Development	2015	2019	Non-Housing Community Development	STATEWIDE	Job Creation; <u>COVID-19 Response and Recovery activities</u>	CDBG: \$7,645,672	Jobs created/retained: 50 Jobs
2	Commercial Revitalization	2015	2019	Non-Housing Community Development	STATEWIDE	Flood and Drainage; Sewer Line Improvements; Street Improvements; Water Line Improvements; and <u>COVID-19 Response and Recovery activities</u>	CDBG: \$1,682,048	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
3	Housing Rehabilitation	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing and <u>COVID-19 Response and Recovery activities</u>	CDBG: \$6,371,393	Homeowner Housing Rehabilitated: 132 Household Housing Unit

4	Neighborhood Revitalization	2015	2019	Non-Housing Community Development	STATEWIDE	Flood and Drainage; Sewer Line Improvements; Street Improvements; Water Line Improvements; and COVID-19 Response and Recovery activities	CDBG: \$9,786,460	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5800 Persons Assisted
5	CDBG-CV Round One	2020	2024	Non-Housing Community Development	STATEWIDE	COVID-19 Response and Recovery activities that may include Acquisition; Administration, Technical Assistance and Planning; Economic Development; Public Improvements; Public Services; and other eligible activities.	CDBG: \$16,660,264	Public Facility or other Infrastructure Activities; Planning Activities; Jobs Created/Retained; and Low/Moderate Income Beneficiaries assisted.

6	CDBG-CV Round Two	2020	2024	Non-Housing Community Development	STATEWIDE	COVID-19 Response and Recovery activities that may include Acquisition; Administration, Technical Assistance and Planning; Economic Development; Public Improvements; Public Services; and other eligible activities.	CDBG \$63,170,132	Public Facility or other Infrastructure Activities; Planning Activities; Jobs Created/Retained; and Low/Moderate Income Beneficiaries assisted.
57	Street Outreach	2015	2019	Homeless	STATEWIDE	Street Outreach to Homeless Persons	ESG: \$0	Homelessness Prevention: 100 Persons Assisted
68	Emergency Shelter and Transitional Housing	2015	2019	Homeless	STATEWIDE	Emergency Shelters and Transitional Housing	ESG: \$3,300,209	Homeless Person Overnight Shelter: 2000 Persons Assisted
79	Permanent Housing for Homeless Persons	2015	2019	Affordable Housing	STATEWIDE	Homeless Prevention	ESG: \$2,200,139	Housing for Homeless added: 1000 Household Housing Unit
810	Rental and Homeownership Activities (CHDOs)	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing Affordable Rental Housing	HOME: \$2,682,150	Rental units constructed: 250 Household Housing Unit Direct Financial Assistance to Homebuyers: 50 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted

911	Housing and Supportive Services	2015	2019	Affordable Housing Non-Homeless Special Needs	STATEWIDE	Housing Placement Assistance Short Term Rent, Mortgage and Utility Payments Short Term Supported Housing Facility Assistance Tenant Based Rental Assistance	HOPWA: \$7,748,771	Tenant-based rental assistance / Rapid Rehousing: 174 Households Assisted Homelessness Prevention: 1310 Persons Assisted
1012	Affordable Rental Housing for Extremely Low Income	2016	2019	Affordable Housing	STATEWIDE	Affordable Rental Housing	Housing Trust Fund: \$9,414,324	Rental units constructed: 45 Household Housing Unit
1113	Affordable Rental Housing	2015	2019	Affordable Housing	STATEWIDE	Affordable Rental Housing	HOME: \$15,669,776	Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted
1214	Affordable Homeownership Housing	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$6,529,074	Homeowner Housing Added: 80 Household Housing Unit

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Economic Development
	Goal Description	The CDBG Program, administered by DEO, has allocated approximately 30 percent of the remaining total Fiscal Year 2019 CDBG allocation after assessing COVID-19 response needs allocation to the economic development category. Projects that are deemed eligible will be considered for a funding allocation up to \$1.5 million for activities described within their applications.
2	Goal Name	Commercial Revitalization

	Goal Description	<p>The CDBG Program has allocated approximately 6.6 percent of the <u>remaining total</u> Fiscal Year 2019 CDBG allocation <u>after assessing COVID-19 response needs</u> to the commercial revitalization category for the next funding cycle. Projects that are deemed eligible will be considered for a maximum funding allocation of up to \$750,000 for activities described within their applications.</p> <p>Priority needs addressed not listed for commercial revitalization- making goods and services more accessible to LMI residents.</p> <p>Goal outcome indicators not listed for commercial revitalization- parking improvements, streetscaping, public facilities, and building rehabilitation.</p>
3	Goal Name	Housing Rehabilitation
	Goal Description	The CDBG Program has allocated 25 percent of the total <u>remaining</u> Fiscal Year 2019 CDBG allocation <u>after COVID-19 response needs are assessed</u> to the housing rehabilitation category for the next funding cycle. Projects that are deemed eligible will be considered for a maximum funding allocation of up to \$750,000 for activities described within their applications.
4	Goal Name	Neighborhood Revitalization
	Goal Description	The CDBG Program has allocated 38.4 percent of the total <u>remaining</u> Fiscal Year 2019 CDBG allocation <u>after COVID-19 response needs are assessed</u> to the neighborhood revitalization category for the next funding cycle. Projects that are deemed eligible will be considered for a maximum funding allocation up to \$750,000 for activities described within their applications.
	Goal Name	<u>CDBG-CV Round One</u>
	Goal Description	<u>The CDBG Program has allocated 100 percent of the total CDBG-CV Round One allocation to meet the needs of the non-entitlement communities in responding to and recovering from COVID-19 in accordance with the CARES Act.</u>
	Goal Name	<u>CDBG-CV Round Two</u>

	Goal Description	The CDBG Program has allocated 100 percent of the total CDBG-CV Round Two allocation to meet the needs of the state in responding to and recovering from COVID-19 in accordance with the CARES Act.
57	Goal Name	Street Outreach
	Goal Description	The ESG Program, administered by DCF, will assist unsheltered homeless individuals and families with locating an emergency shelter or housing, case management needs, transportation, emergency health services, and emergency mental health services in the respective CoCs throughout Florida. The programs will be carried out by local CoC lead agencies as a collaborative effort to coordinate area providers of service. Funding levels for both outreach and shelters shall not be more than 60 percent of ESG Program awards.
68	Goal Name	Emergency Shelter and Transitional Housing
	Goal Description	The ESG Program funding will enable DCF to provide emergency shelter facilities, including domestic violence facilities, throughout the state. The programs will be carried out by local CoC lead agencies as a collaborative effort to coordinate area providers of service. Funding levels for both outreach and shelters shall not be more than 60 percent of ESG Program awards.
79	Goal Name	Permanent Housing for Homeless Persons
	Goal Description	The ESG Program goals will be carried out by 27 local CoC lead agencies as a collaborative effort to coordinate area providers of service in accordance with local CoC Plans. Funding levels for permanent housing activities (prevention and rapid re-housing) will equal the balance of the ESG Program awards not used on Street Outreach, Emergency Shelter, HMIS and Administrative Costs.
810	Goal Name	Rental and Homeownership Activities (CHDOs)
	Goal Description	The HOME Program, administered by FHFC, has allocated \$2,682,150 from the 2019 annual funding allocation to fund rental and homeownership activities sponsored by qualified Community Housing Development Organizations (CHDOs). The funding can be used for new construction, rehabilitation, rental assistance or down payment assistance activities.
911	Goal Name	Housing and Supportive Services

	Goal Description	The HOPWA Program, administered by DOH, has allocated \$7,748,771* of the 2019 Annual Allocation to fund activities carried out by the 11 project sponsors throughout Florida, including financial assistance in the form of short-term rent, mortgage and utility (STRMU) payments; short-term supported housing assistance; supportive housing services (i.e., counseling and healthcare services); and TBRA for persons with HIV/AIDS. *This amount includes additional funds for EMSAs which may or may not re-designate their allocation back to the state. As such, this number may be reduced should they choose to administer their grant locally.
10 <u>12</u>	Goal Name	Affordable Rental Housing for Extremely Low Income
	Goal Description	The NHTF Program, administered by FHFC, has allocated \$9,414,324 from the 2019 annual funding allocation to fund affordable rental housing for ELI households through the Request for Application (RFA) process. Funding may be used for activities including construction, demolition, acquisition of real property, related soft costs and operating cost reserves funded with operating assistance.
11 <u>13</u>	Goal Name	Affordable Rental Housing
	Goal Description	The HOME Program has allocated \$15,669,776 from the 2019 annual funding allocation and program income and de-obligated funding to fund affordable rental housing through the RFA process. Funding can be used for activities such as construction, rehabilitation and rental assistance for low- and moderate-income households.
12 <u>14</u>	Goal Name	Affordable Homeownership Housing
	Goal Description	The HOME Program has allocated \$6,529,074 from the 2019 annual funding allocation and program income and de-obligated funding to fund affordable homeownership housing either through the RFA process or through a reservation process. Funding can be used for homebuyer assistance activities, such as down payment assistance and construction activities.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The following chart reflects the planned percentage distribution of the FFY 2019 CDBG, ESG, HOME, NHTF, and HOPWA programs. Additionally, this section is a description of how the allocation distribution was determined, and how the allocation distribution will address the

priority needs and goals determined in the Strategic Plan portion of the Consolidated Plan.

Funding Allocation Priorities

	COVID-19 Response and Recovery (%)	Economic Development (%)	Commercial Revitalization (%)	Housing Rehabilitation (%)	Neighborhood Revitalization (%)	Street Outreach (%)	Emergency Shelter and Transitional Housing (%)	Permanent Housing for Homeless Persons (%)	Rental and Homeownership Activities (CHDOs) (%)	Housing and Supportive Services (%)	Affordable Rental Housing for Extremely Low Income (%)	Affordable Rental Housing (%)	Affordable Homeownership Housing (%)	Total (%)
CDBG		30	7	25	38	0	0	0	0	0	0	0	0	100
CDBG-CV	100													100
HOME		0	0	0	0	0	0	0	15	0	0	60	25	100
HOPWA		0	0	0	0	0	6	0	0	94	0	0	0	100
ESG		0	0	0	0	0	60	35	0	0	0	0	0	95
HTF		0	0	0	0	0	0	0	0	0	100	0	0	100

Table 8 – Funding Allocation Priorities

Reason for Allocation Priorities

The percentages, described in the table above place an emphasis or priority on the types of projects that will be funded for each of the five HUD-funded grant programs described in the 2015-2019 Consolidated Plan. For the CDBG Program, if the number of applications received are insufficient to fully utilize all funds allocated to a category, the balance of the funds in that category can be reallocated to another category receiving more applications than there are funds available. Also, grant category funding levels may be increased and/or decreased by reallocated funds. Similarly, for the HOME Program, if the applications received are insufficient to fully utilize all funds allocated to a category, the balance of funds in that category may be reallocated to another category receiving more applications than there are funds available. Funding in each category may be increased and/or decreased by reallocated funds. The allocation percentages for each individual grant program were

determined based on the needs presented in the needs assessment section of the 2015-2019 Consolidated Plan, the comments and survey responses received during the citizen participation process conducted during the development of the Consolidated Plan and the NHTF Allocation Plan and applications received in the past. For the HOPWA Program, the types of housing and supportive services will be based on financial and programmatic requirements in accordance with HUD-eligible activities delivered by local project sponsors. For the ESG Program, the types of projects will be in accordance with HUD-eligible activities carried out by the local CoC lead agencies and administered by DCF.

The CDBG-CV allocation priorities include technical assistance and planning, economic development, public improvements, public services and other eligible activities to prevent, prepare for, and respond to coronavirus. For the FFY 2019 CDBG Allocation, the CDBG Program will assess COVID-19 response needs not met with the CDBG-CV allocation and may re-allocate funds to CDBG-CV.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

Response exceeds number of allowable characters, please refer to Unique Appendices.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

This section of the FFY 2019 Annual Action Plan describes how each annual allocation of CDBG, ESG, HOME, NHTF and HOPWA Program funds will be distributed geographically throughout Florida.

Distribution Methods

Table 9 - Distribution Methods by State Program

1	State Program Name:	Florida Emergency Solutions Grant Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	The ESG Program is a formula grant program based upon the demographics of Florida’s counties and cities. The state receives grant funds directly from HUD and will sub-grant the ESG funds to CoC designated lead agencies to carry out activities consistent with their local CoC Plans. Eligible beneficiaries must meet the “homeless” definition in 24 CFR § 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR § 576.104. Lead agencies may sub-contract with local governments and nonprofits to provide ESG activities in their respective areas. Funding for local projects will be determined by the lead agencies.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Grant applications in state FY16-17 were awarded on a three-year grant cycle. The Office on Homelessness is currently soliciting projects for state FY19-20, 20-21 and 21-22. The award distribution will follow guidelines set forth in the solicitation as described in previous years’ action plans. Recurring funds are made available based on initial grant awards from the statewide solicitation process in FY16-17 and the receipt of funding from HUD.

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to ESG.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The ESG Program is a formula grant program based upon the demographics of Florida’s counties and cities. The state receives the grant funds directly from HUD and will sub-grant the ESG funds to local continuum of care lead agencies to carry-out activities consistent in their CoC plans. Lead agencies may sub-contract with units of general purpose local government and/or nonprofit organizations to provide direct service to eligible beneficiaries meeting the “homeless” definition in 24 CFR § 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR § 576.104. Local governments can establish additional eligibility criteria for program beneficiaries in accordance with 24 CFR § 576.400(e).</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to ESG.</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>The ESG Program will receive a total allocation of \$5,500,348 in funding for federal fiscal year 2019. DCF will require local lead agencies follow federal regulations and spend no more than 60 percent on Street Outreach and Emergency Shelter combined. Additionally, CoCs may spend no more than 5 percent of awarded funds on administrative costs. The types of services funded include: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and Homeless Management Information System costs among the 27 CoC agencies to provide services consistent with the CoC plans to address homelessness. The Office on Homelessness maintains for its administrative costs, the remaining balance allowed under 24 CFR 576.100 for the administration of ESG and the provision of technical assistance to service providers and local CoC.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The maximum award amount for any lead agency is \$400,000 with a maximum 5 percent administration budget. The lead agencies will plan and coordinate activities within their local area that are consistent with CoC plans. Sub-providers of services will be local governments and nonprofit organizations and their threshold funding amounts will be decided by the lead agencies and approved by the Office on Homelessness.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The anticipated outcome measures for the ESG Program are based on how many eligible homeless service providers and shelters receive funding assistance, how many homeless persons benefit from emergency shelter and transitional housing assistance, how many homeless persons received permanent housing, how many people are kept in their existing housing and how many people are still stably housed in incremental months after receiving assistance.</p>
<p>2</p>	<p>State Program Name: Florida HOME Investment Partnership Program</p>
<p>Funding Sources:</p>	<p>HOME</p>
<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The HOME Program funds are allocated to provide necessary financial support for various activities, creating long-term affordable, safe, decent and sanitary housing for extremely low- and low-income persons and households. FHFC works with both the public- and private-sector throughout the state to assist in meeting the needs of affordable housing in rural areas. FHFC distributes HOME funds either through a request for applications process, a reservation system or a demonstration project.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Application selection criteria for the HOME Program varies based upon the type of funding priority determined by FHFC for allocation distribution and amount of funding available to achieve funding priorities determined by FHFC. For example, scoring criteria for larger scale rental development priority projects would be based on level of experience of the applicant with implementation of HOME funds and Davis-Bacon federal requirements and the amount of funding available as leverage to the project. However, FHFC uses a different scoring criteria for smaller scale rural projects that are unable to provide leverage funds to a project and instead base priority funding projects by level of experience and past project performance.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to HOME.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to HOME.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to HOME.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The HOME Program will receive a total allocation of \$17,881,000 in funding for FY 2019. Of the total funding allocation, \$2,682,150 will be reserved for developments sponsored by qualified Community Housing Development Organization (CHDO) applicants. In the event insufficient applications meeting the threshold are received to allocate the anticipated amount to rental developments, the remaining unallocated funds may be shifted to homeownership activities. The same applies to homeownership activities, so the remaining unallocated funds may be shifted to rental activities. The remaining funds allocated will be awarded via the RFA process or a reservation system based on the appropriate rule chapters, or through one or more demonstration projects that create affordable rental and homeownership opportunities through construction or rehabilitation of housing units or through direct homebuyer or rental assistance. \$1,788,100 of the total annual allocation will be used by FHFC for administrative costs pursuant to 24 CFR § 92.207.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The grant size limits imposed by FHFC for the RFA process(es) each year are based on the size of the project and the type of priority criteria scoring determined by FHFC HOME Program staff. During the fiscal year 2018 allocation distribution cycle, FHFC conducted one RFA for developments in hurricane impacted areas or located in rural areas. The maximum grant size for this RFA was \$5 million.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The HOME Program performance outcomes are based on how many affordable homeownership and rental housing units are constructed or rehabilitated and how many low- and moderate-income beneficiaries receive purchase assistance or rental assistance. In 2019, it is expected that the HOME Program will finance construction or rehabilitation of 250 rental housing units, rental assistance for affordable rental housing for 500 households and purchase assistance for 50 new homeowners.</p>
<p>3 State Program Name:</p>	<p>Florida Housing Opportunities for Persons With AIDS (HOPWA) Grant Program</p>
<p>Funding Sources:</p>	<p>HOPWA</p>

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The HOPWA Program may receive a total allocation \$7,748,771 in funding for fiscal year 2019. Of the total funding allocation, \$7,516,308 (97 percent) of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent of the median family income for the area served. Eligible activities include rental payments, security deposits, and utility allowances to promote housing opportunities for persons with HIV/AIDS. The remaining 3 percent of the funding will be spent on administrative activities carried out by DOH.</p> <p>DOH currently contracts with 11 project sponsors to administer the HOPWA Grant Program in designated geographic areas, the majority of which are rural. Ten of Florida’s 14 Ryan White Part B consortia/planning bodies provide recommendations for needs assessments, planning, and prioritization for state HOPWA funds. The six consortia/planning body areas not listed are eligible metropolitan statistical areas (EMSAs) that receive funding directly from HUD. The state program provides funds for HOPWA services in 51 of Florida’s 67 counties. The EMSAs, including those administered by the state, provide services for the remaining 16 counties.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The priority of applications is determined by how many low- and moderate-income beneficiaries with HIV/AIDS will be served and the past performance of the project sponsor that is requesting funds.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to HOPWA.</p>

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to HOPWA.
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<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>A minimum of 97 percent of the state HOPWA grant award will be allocated statewide to 11 project sponsors to carry out eligible services and activities for the state program. These project sponsors are local community organizations and county health departments. In order to ensure that the state pays a fair and reasonable price for the services to be provided and to enhance quality, availability and collaboration within the state housing program, DOH drafted a Request for Proposal (RFP) for six years from 2016 to 2022. The following project sponsors were selected through the RFP process:</p> <ul style="list-style-type: none"> • Lutheran Services Florida, Inc., Northwest (Escambia, Okaloosa, Santa Rosa and Walton Counties) • BASIC NWFL, Inc. (Bay, Calhoun, Gulf, Holmes, Jackson and Washington Counties) • Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor and Wakulla Counties) • WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee and Union Counties) • Florida Department of Health-Hillsborough (Manatee County) • United Way of Brevard County, Inc. (Brevard County) • Florida Department of Health-Monroe (Monroe County) • Health Planning Council of Southwest Florida, Inc. (Charlotte, Collier, DeSoto, Glades, Hendry, Lee and Sarasota Counties) • Florida Department of Health-Volusia (Flagler and Volusia Counties) • Florida Department of Health-Polk (Highlands, Hardee and Polk Counties) • Florida Department of Health-St. Lucie (Indian River, Martin, Okeechobee and St. Lucie Counties) <p>Funds were allocated within each geographical area in accordance with the methodology described above. Approximately \$7,516,308, or 97 percent of the FFY 2019 grant award will be allocated to benefit eligible persons whose income does not exceed 80 percent of the median family income for the area served. The remaining 3 percent of the grant award will be used to cover grantee administrative costs. EMSA funds re-designated to the state HOPWA Program will be administered by DOH in the same manner and for the same activities as the state HOPWA Program.</p> <p>The state program currently has two faith-based organizations, three community-based organizations, five county health departments and two planning councils providing services either directly or via sub-contract.</p>
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	<p>Describe how resources will be allocated among funding categories.</p> <p>Florida distributes funds annually based on the cumulative number of persons living with HIV or AIDS cases in 11 geographical service areas through December 31. In addition, allocations are based on utilization rates and available funds. The allocation methodology is reviewed periodically, and DOH takes recommendations into account while making final annual allocation decisions. EMSAs in the state that qualify for direct HOPWA funding from HUD may be eligible to receive state HOPWA Program funds only when funds exist beyond the amount required to meet 100 percent of the need of the state program service areas.</p>
	<p>Describe threshold factors and grant size limits.</p> <p>The HOPWA Program does not require specific threshold factors or grant size limits for annual allocation distribution to project sponsors. Instead, the program determines annual allocation amounts based on budgets submitted by the 11 project sponsors, and the percentage of beneficiaries anticipated to be served by the grant funded projects and activities. The HOPWA Program coordinators make the final funding allocation determination based on the feasibility of the project sponsor’s budget proposal and amount of funding available to be distributed statewide.</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</p> <p>The anticipated outcome measures for the HOPWA Program are based on the number of persons with HIV/AIDS that receive direct financial assistance from eligible project sponsors in the form of short-term rent, mortgage and utility (STRMU) payments, tenant-based rental assistance (TBRA), permanent placement (PHP), short-term transitional assistance, resource identification, comprehensive housing case management and other eligible housing services.</p>
4	<p>State Program Name: Florida Small Cities Community Development Block Grant Program</p>
	<p>Funding Sources: CDBG</p>

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>DEO receives an annual allocation from HUD to administer the CDBG Program. DEO publishes a Notice of Funding Availability (NOFA) in the Florida Administrative Register prior to the opening of the annual funding cycle. This NOFA informs Florida residents of the availability of CDBG funding by category and the opening and closing date of the funding cycle.</p> <p>When DEO receives notification of the annual allocation, the Small Cities CDBG planning manager reviews the allocation and makes recommendations for funding based on previous allocations and distributions, expected application submissions and department priorities, including for FFY 2019 CDBG program funding to prevent, prepare for and respond to coronavirus. The recommendations are then reviewed by the Small Cities and Rural Communities bureau chief and approved or revised. This distribution is incorporated into the annual action plan prior to the public hearing on the action plan.</p> <p>Deobligated funds and program income funds sometimes become available during the federal FY. When funds become available, the planning manager and bureau chief meet to determine how to allocate these funds. The funds can be used for COVID-19 response needs that were not met in the CDBG-CV cycles, to award the highest-ranking applications that did not receive funding during the current cycle, or economic development projects on the funding reservation list. If emergency set-aside funds become available on the first of April because there has been no state declared disaster, those funds are used to award the highest- ranking unfunded applications from the cycle.</p> <p>Neighborhood revitalization, housing rehabilitation and commercial revitalization subgrants are awarded on a competitive basis. Economic development subgrants are awarded on a competitive basis if the CDBG Program receives more funding requests than there are funds available. Otherwise, eligible economic development projects are awarded on a first come, first served basis.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The funding categories for the CDBG Program are established by state law. The percentage of funds allocated for each category are determined based on public meetings, comments received on the Consolidated Plan and the annual action plan and past funding experience. The criteria used for reviewing funding applications are outlined in federal regulations, state statutes, the program’s administrative rules, application manual and the Consolidated Plan.</p> <p>Upon receipt of an application, an initial review is conducted to determine if threshold criteria have been met. This review is used as a screening method to ensure compliance with minimum application requirements and to ensure that applications from communities that are not in compliance with federal or state laws are not funded. Seven specific criteria established by Section § 290.0475, Florida Statutes, establish the basis upon which DEO may reject an application without regard to scoring:</p> <ol style="list-style-type: none"> 1. The application is not received by the specified deadline date; 2. The proposed project activities fail to meet one of the three national objectives contained in federal and state legislation; 3. The proposed activities are not eligible under federal legislation; 4. The proposed activities are not in compliance with the adopted local comprehensive plan, as approved by DEO; 5. The applicant has an open CDBG, except as provided in § 290.046(2)(b) and (c), F.S. and department rules; 6. The local government is not in compliance with citizen participation requirements; and 7. Information provided in the application that affects eligibility or scoring is misrepresented. <p>DEO does not award a grant until it has determined, based upon a site visit, that the project and/or activities are eligible, in accordance with the description contained in the application and that any open economic development grant is on time. If DEO determines, after an application site-visit that any information in the application that affects scoring has been misrepresented, the application is rejected.</p>
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The CDBG Program is established in Sections 290.0401 through 290.048, Florida Statutes and administered through Chapter 73C-23, Florida Administrative Code (F.A.C.). The statute and administrative code contain guidelines for who can apply for CDBG funding, the application process and how the applications are scored and ranked. The CDBG application form, which is incorporated into the administrative rule by reference, gives the specific scoring criteria for the economic development, neighborhood revitalization, housing rehabilitation and commercial revitalization applications. The application form can be downloaded from the DEO/CDBG webpage www.FloridaJobs.org/CDBGApplicantInfo. Information to be included in the application can be found on the HUD website, the CDBG website and generated during the application process.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to CDBG.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to CDBG.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Funding amounts are assigned to each funding category based on need evaluation. For the FFY 2019 funding cycle, it was determined that there was higher demand and need for neighborhood revitalization category projects throughout the state. That determination was made based on the amount of applications that were received, but left unfunded from the prior federal FY. The remaining funding categories were assigned percentages based on the number of applications submitted in the prior funding cycle and based on the goals and objectives that were chosen as priority needs and goals from the needs assessment and market analysis sections of the 2015-2019 Consolidated Plan.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The local governments' low- and moderate-income (LMI) population determines the maximum amount of funds for which they can apply. Population groupings are based on HUD modified census figures summarizing low- and moderate-income population as the following chart shows:</p> <p>LMI Population Subgrant Ceiling</p> <ul style="list-style-type: none"> • 1 – 499: \$600,000 • 500 – 1,249: \$650,000 • 1,250 – 3,999: \$700,000 • 4,000 – and above: \$750,000 <p>Economic Development subgrants: \$1,500,000.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The anticipated outcome measures for the CDBG Program are based on the number and type of applications received from eligible sub-grantees in the four eligible categories (neighborhood revitalization, commercial revitalization, housing rehabilitation and economic development). Outcome measures for these programs include number of housing units rehabilitated, number of linear feet of sewer lines, water lines, street paving and sidewalks completed, number of buildings receiving façade improvements, number of low- to moderate-income beneficiaries and number of jobs created or retained.</p>
5	<p>State Program Name:</p>	<p><u>Community Development Block Grant - Coronavirus Program</u></p>
	<p>Funding Sources:</p>	<p><u>CDBG-CV Round One</u></p>
	<p>Describe the state program addressed by the Method of Distribution</p>	<p><u>DEO receives a CDBG-CV Round One allocation from HUD to administer the program. The allocation details and Method of Distribution is incorporated by substantial amendment to the 2019 annual action plan prior to the public notice and 7-day comment period on the substantial amendment. DEO publishes a Notice of Funding Availability (NOFA) in the Florida Administrative Register prior to the opening of the funding cycle. This NOFA informs Florida residents of the availability of CDBG-CV funding and the opening and closing date of the funding cycle. CDBG-CV Round One subgrants are then awarded to FFY 2020 CDBG-eligible communities on a competitive basis.</u></p>
	<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p><u>The Method of Distribution for Round One funding will be distributed through a competitive application process for FFY 2020 CDBG eligible non-entitlement communities, and supplemented with additional funds, based on need, available through the FFY 2019 CDBG program.</u></p> <p><u>The non-entitlement community program and activities will closely align with the current competitive CDBG program. Eligible COVID-19 response activities may include rehabilitation and construction of publicly-owned facilities; planning and capacity building; and public infrastructure to promote economic development or other eligible CDBG activities. Applications will be awarded based on score and eligible project readiness.</u></p>
	<p>If only summary criteria were described, how can potential applicants</p>	<p><u>Potential applicants can access application guidelines, forms and other technical assistance publications on DEO's CDBG-Coronavirus webpage (http://www.floridajobs.org/CDBG-CV). Information to be included in the application can be found on the HUD website, the CDBG webpage and generated during the application process.</u></p>

<p><u>access application manuals or other state publications describing the application criteria?</u> <u>(CDBG only)</u></p>	
<p><u>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</u></p>	<p><u>Not applicable to CDBG.</u></p>
<p><u>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations).</u> <u>(HOPWA only)</u></p>	<p><u>Not applicable to CDBG.</u></p>
<p><u>Describe how resources will be</u></p>	<p><u>Resources will be allocated among funding categories based on the evaluation of needs related to response and recovery for COVID-19. Additionally, based on need, all or some of the FFY19 CDBG funding may be reallocated for</u></p>

<p>allocated among funding categories.</p>	<p>COVID-19 response and recovery.</p> <p>CDBG-CV Round One funding will be allocated to non-entitlement communities only.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Threshold factors and grant size limits will be developed based on needs of the communities and will be included in the application form and guidelines on DEO's CDBG – Coronavirus webpage (http://www.floridajobs.org/CDBG-CV)</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The outcome measures expected as a result of the method of distribution include number of COVID-19 effected LMI beneficiaries and number of LMI beneficiaries assisted to prevent, prepare, respond and recovery from COVID-19. Other anticipated outcome measures may be based on the proposed activities in applications received from eligible sub-grantees such as number of technical assistance and planning activities, number of jobs created/retained, or re-purposed facility construction/rehabilitation.</p>
<p>6</p>	<p>State Program Name: Community Development Block Grant-Coronavirus Program</p> <p>Funding Sources: CDBG-CV Round Two</p> <p>Describe the state program addressed by the Method of Distribution. DEO receives a CDBG-CV Round Two allocation from HUD to administer the program. The allocation details and method of distribution is incorporated by substantial amendment to the 2019 annual action plan prior to the public notice and 7-day comment period on the substantial amendment. DEO publishes a Notice of Funding Availability (NOFA) in the Florida Administrative Register to announce the availability of the funding. This NOFA informs Florida residents of the availability of CDBG-CV funding.</p> <p>CDBG-CV Round Two method of distribution will include an allocation formula that considers factors such as number of COVID-19 cases or low- to moderate-income populations or uses a HUD formula methodology. Eligible entitlement and non-entitlement communities will apply for funding up to the amount available per the funding formula. The formula will determine the maximum amount of funds that can be applied for by each individual entitlement community or the non-entitlement communities as a whole. Subgrants will be awarded based on review of applications for eligible activities and subrecipient capacity to administer programs efficiently, effectively and compliantly.</p> <p>Describe all of the criteria that will be Criteria used to select applications will include a needs and capacity review to evaluate the applicant's COVID 19 response and recovery program need and their capacity to administer the program efficiently, effectively, and</p>

<p><u>used to select applications and the relative importance of these criteria.</u></p>	<p><u>compliantly.</u></p> <p><u>Round Two funding will be determined by a formula that considers factors such as the number of COVID-19 cases or low- to moderate-income population or uses a HUD formula methodology. The formula will determine the maximum amount of funds that can applied for by each individual entitlement community and non-entitlement communities as a whole. Funds will be awarded to entitlement communities based on the needs and capacity review application process, up to the amount of the entitlement community’s allocation. Funds will be awarded to non-entitlement communities through a competitive application process.</u></p>
<p><u>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</u></p>	<p><u>Potential applicants can access application guidelines, forms, and other technical assistance publications on the DEO/CDBG webpage (http://www.floridajobs.org/). Information to be included in the application can be found on the HUD website, the CDBG website and generated during the application process.</u></p>
<p><u>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</u></p>	<p><u>Not applicable to CDBG.</u></p>
<p><u>Identify the method of</u></p>	<p><u>Not applicable to CDBG</u></p>

<p><u>selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations).</u></p> <p><u>(HOPWA only)</u></p>	
<p><u>Describe how resources will be allocated among funding categories.</u></p>	<p><u>A CDBG-CV allocation formula will be developed that considers factors such as number of COVID-19 cases or low- to moderate-income populations or uses a HUD formula methodology. Resources will be allocated among funding categories based on review of applications for eligible activities and subrecipient capacity to administer programs efficiently, effectively and compliantly.</u></p> <p><u>CDBG-CV Round Two funding will be allocated to both entitlement and non-entitlement communities. Funds will be awarded to entitlement communities based on the needs and capacity review application process, up to the amount of the entitlement community's allocation. Funds will be awarded to non-entitlement communities through a competitive application process.</u></p>
<p><u>Describe threshold factors and grant size limits.</u></p>	<p><u>Threshold factors and grant size limits will be developed based on needs of the communities and will be included in the application form and guidelines on the DEO/CDBG webpage (http://www.floridajobs.org/CDBG-CV)</u></p>
<p><u>What are the outcome measures expected as a result of the method of distribution?</u></p>	<p><u>The outcome measures expected as a result of the method of distribution include number of COVID-19 effected LMI beneficiaries and number of LMI beneficiaries assisted to prevent, prepare, respond and recovery from COVID-19. Other anticipated outcome measures may be based on the proposed activities in applications received from eligible sub-grantees such as number of technical assistance and planning activities, number of jobs created/retained, or repurposed facility construction/rehabilitation.</u></p>
<p>5 State Program Name:</p>	<p>National Housing Trust Fund Program</p>

7	Funding Sources:	Housing Trust Fund
	Describe the state program addressed by the Method of Distribution.	NHTF Program funds will be used in tandem with other financing programs to provide necessary financial support to create new, 30-year affordable rental housing for extremely low-income households. FHFC will allocate NHTF funds through a competitive Request for Applications process directly to eligible recipients.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The criteria listed below have all been deemed of equal relative importance. If an applicant does not meet these criteria, they will not receive funding.</p> <ul style="list-style-type: none"> ☐ The development must be permanent rental housing and each NHTF-designated unit may have no more than two bedrooms; ☐ The NHTF-designated units must remain affordable to ELI households through a Land Use Restriction Agreement for no less than 30 years, and the development must remain affordable at designated income levels for a minimum of 30 years; ☐ The applicant must certify that it understands that by receiving NHTF funds, it commits to set aside the required number of units in its property for the priority households specified in this plan; ☐ The applicant must show via its developer experience its ability to obligate NHTF funds and undertake eligible activities in a timely manner; ☐ A description of the eligible activities to be conducted with the NHTF funds; ☐ Extent to which the application makes use of non-federal funding sources; ☐ Extent to which a proposed development has federal, state or local project-based rental assistance; ☐ Certification that applicant will comply with the requirements of the NHTF program and that housing units assisted with the NHTF will comply with NHTF requirements; ☐ Be familiar with the requirements of other federal, state or local housing programs that will be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs through demonstrated experience with developing, owning and managing affordable multifamily rental housing developments; ☐ To provide a Tenant Selection Plan during credit underwriting to carry out management practices related to leasing to homeless households or persons with special needs; • Participate in the state’s “Link Strategy” which requires applicants awarded financing to work with at least one Special Needs Household Referral Agency working in that county that will refer eligible homeless, at-risk homeless or special needs households for residency in the NHTF-financed units; ☐ Meet specified green building and accessibility standards; ☐ Propose developments in locations that are proximate to public transportation options and amenities such as grocery stores and pharmacies.
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to NHTF.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to NHTF.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to NHTF.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Ninety percent of the NHTF allocation will be used to finance affordable rental units for extremely low-income households, and 10 percent of the allocation will be used by FHFC for administrative costs pursuant to § 93.202.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Pursuant to § 91.320(k)(5) and § 93.300(a), funding limits are based on maximum per-unit development subsidy amounts specified by FHFC and the portion of units that will be required to be set aside in a larger property to serve the populations targeted through the NHTF Program. For example, if four units out of 100 total units must be set aside for this purpose, the grant size limit will be based on the per-unit limit multiplied by four. FHFC has specified per-unit limits by unit mix (zero, one and two bedrooms); based on construction type (e.g., garden-style wood, high rise, etc.) and for three geographic cost regions of the state. While a development may have a mix of unit sizes and bedrooms, NHTF units with more than two bedrooms will be prohibited.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>In 2019, it is expected that the NHTF program will assist in financing construction of 45 affordable rental units to serve extremely low-income residents.</p>

Discussion:

In conclusion, the distribution methods in place for each of the five HUD-funded grant programs described above are aligned with the current federal regulations and are standard for each annual allocation cycle. The distribution methods for all administered grant programs in the state are based on several factors, including both geographical and demographical conditions. The CDBG Program bases allocation distribution methods on the eligible grantees who submit competitive scored applications that are awarded based on score and eligible project readiness. The ESG Program bases allocation distribution methods on a competitive grant application scored based on eligible activities to persons meeting the definition of homeless, or in imminent danger of becoming homeless and the capacity to carry-out these activities. The HOME Program bases allocation distribution on awards to high performing CHDOs for the CHDO set-aside and other eligible applicants to receive direct funding from the program to carry out eligible program activities and an application process where award determinations are based on the quality of the application submissions and the amount of the requests from eligible local governments and housing provider organizations. The HOPWA Program bases allocation distribution on the amount of funding available and the proportion of persons living with HIV or AIDS within 11 project sponsor areas. The NHTF Program bases allocation methods on a competitive Request for Application process to ensure that over time, properties assisted with NHTF funds will be geographically dispersed throughout the state, but allocated only to experienced, qualified applicants that meet specific criteria to ensure that a high-quality development is built and then offers opportunities for residency to extremely low-income populations that will be served with this funding.

The CDBG-CV Round One allocation will be distributed to eligible non-entitlement communities and may be supplemented based on need with additional funds available through the FY 2019 CDBG program. The method of distribution for Round One funding will be through a competitive application process for non-entitlement communities to develop programs related to COVID-19 response and recovery. Eligible activities may include rehabilitation and construction of publicly-owned facilities; planning and capacity building; and public infrastructure to promote economic development, or other eligible activities. Applications will be awarded based on score and eligible project readiness.

The CDBG-CV Round Two allocation will be distributed to eligible entitlement and non-entitlement communities. The method of distribution will be determined by a formula that considers factors such as number of COVID-19 cases or low- to moderate-income population, or uses a HUD formula methodology. The formula will determine the maximum amount of funds that can be applied for by each individual entitlement community and non-entitlement communities as a whole. The non-entitlement communities' allocation will be distributed through a competitive application process. The entitlement community funds will be distributed based on a needs and capacity review process and awarded up to the amount of the entitlement community's formula allocation. If funds are still available after the application period close, funds will be redistributed to other eligible communities. Communities will apply for programs related to COVID-19 response and recovery that can include rehabilitation and construction of publicly-owned facilities; planning and capacity building; public services; public infrastructure to promote economic development; and assistance to businesses that employ low- to moderate-income individuals; or other eligible activities.

AP-35 Projects – (Optional)

Introduction:

The CDBG, ESG and HOPWA Programs do not provide money to specific projects. Each program allows eligible grantees to select new or continuation projects to apply their awarded funds toward, if the projects meet all grant program eligibility requirements and goals aligned with the Consolidated Plan.

HOME for rental developments are selected through a statewide RFA process. Eligible housing providers (nonprofits, for-profit developers, local governments, public housing authorities and CHDOs) are encouraged to apply for HOME funding. There are three primary criteria applicants must demonstrate:

(1) ability to proceed with construction or rehabilitation; (2) experience in developing affordable housing; and (3) ability to leverage HOME funds.

The HOME Rental Program offers funds to eligible housing providers for the acquisition, rehabilitation, new construction, conversion of non-residential units to residential units and reconstruction of multifamily housing. HOME funds may be the primary source of financing or may bridge the gap between the development's primary financing and the total development costs. At least 15 percent of the annual allocation is set-aside for CHDO developments with the remaining funds being allocated to CHDO and other developments depending on the ranking.

HOME funds for homeownership fall under the Florida Housing Finance Corporation's Homeownership Pool (HOP) Program, under Rule 67-57, F.A.C., and is designed to be a non-competitive and on-going program with developers reserving funds for eligible homebuyers to provide purchase assistance on a first-come, first-served basis.

The HOP Program is available to nonprofit and for-profit organizations and the United States Department of Agriculture - Rural Development (USDA-RD).

HOME funds are used to provide financial support to families of low- to moderate-incomes with down payment and closing costs assistance up to the amounts stipulated in the HUD regulations. These funds require repayment if the homebuyer ceases to occupy the property as their primary residence during the affordability period, sells or transfer ownership or rents the property. Repayments are re-invested in the HOME program.

Tenant-Based Rental Assistance (TBRA) provides Public Housing Authorities (PHAs) who administer the HUD Section 8 Housing Choice Voucher Program with HOME TBRA funds to assist their local residents as these PHAs have a staggering wait list of potential applicants for housing.

NHTF Program developments will be selected through a statewide Request for Application process. Eligible applicants (including nonprofit and for-profit developers and public housing authorities) will apply for NHTF funding in tandem with other primary affordable financing, e.g., Low Income Housing Tax

Credits. This program will only offer financing for new construction of multifamily rental properties.
NHTF funds will assist in bridging the gap between a development's primary financing and its total development costs.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

Yes

Available Grant Amounts

The maximum amount of an individual loan guarantee commitment that an eligible local government may receive is limited to \$5 million.

Acceptance process of applications

Response exceeds number of allowable characters, please refer to Unique Appendices.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State’s Process and Criteria for approving local government revitalization strategies

Not applicable.

AP-50 Geographic Distribution – 91.320(f)

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

Response exceeds number of allowable characters, please refer to Unique Appendices.

Geographic Distribution

Target Area	Percentage of Funds
STATEWIDE	100

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Since HUD directly funds six eligible metropolitan statistical areas (EMSAs) serving 16 counties, the remaining 51 counties are served by 11 project sponsors through the state HOPWA Program. The HOPWA Program bases allocation distribution on the amount of funding available, and the proportion of persons living with HIV or AIDS within 11 project sponsor areas. The HUD-funded HOPWA Program described in this 2019 Annual Action Plan bases allocation distribution on geographical factors. The geographical distribution method is based on the location of the 11 project sponsors who serve specific counties and jurisdictions within their designated geographical area range. The 11 project sponsors serve an average of five counties. The project sponsors serve all jurisdictions within the counties based on level of need and availability of funding.

Discussion

None.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

All five of the federal funded grant programs described in the 2015-2019 Consolidated Plan (CDBG, HOME, ESG, NHTF and HOPWA) have strategies to achieve affordable housing goals each year. The CDBG Program supports affordable housing by providing funds for rehabilitation or reconstruction of housing units. The HOME Program addresses affordable housing for low- and very low-income households by providing rehabilitation, reconstruction, new construction and rental assistance activities. The ESG Program supports affordable housing by providing transitional and rapid re-housing activities to the homeless segment of the population. The HOPWA Program supports affordable housing by providing housing opportunities to persons with HIV/AIDS. This includes adhering to Fair Market Rents (FMR) and rent reasonableness. The HOME, ESG and HOPWA Programs set affordable housing goals to achieve each federal FY. The CDBG Program bases their accomplishments on the number of beneficiaries served with housing rehabilitation funds each application cycle. The NHTF Program will work in tandem with other affordable housing programs to finance new units for extremely low-income residents.

One Year Goals for the Number of Households to be Supported	
Homeless	70
Non-Homeless	712
Special-Needs	34
Total	816

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	500
The Production of New Units	366
Rehab of Existing Units	132
Acquisition of Existing Units	0
Total	998

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

Discussion:

In conclusion, affordable housing continues to be a top priority for HUD-funded grant programs in the state due to the statewide need for all segments of the population. All goals, objectives and strategies to expand affordable housing efforts in each of the five grant programs described throughout this Annual Action Plan align with the 2015-2019 Consolidated Plan and will be implemented in accordance to the allocation distribution methods described in the previous sections of this document.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The CDBG, ESG and HOPWA Programs do not allocate direct funding to Public Housing Agencies (PHAs), nor are they eligible to support competitive applications to request funding from any of the programs. FHFC contracts with certain PHAs to administer short-term, tenant-based rental assistance with HOME funds and PHAs may be eligible to apply for rental development funding through a Request for Application process. There are direct grant funding programs and initiatives available through the U.S. Department of Housing and Urban Development Office of Public and Indian Housing for PHAs who demonstrate good performance standing and are not designated as troubled based on low monitoring and performance scores. PHAs determined to have high performance records are eligible to receive direct funding in order to implement rental assistance and affordable housing programs such as Section 8 project-based rental assistance and voucher programs.

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

- Provide the tools and education necessary for public housing residents to move toward the goal of self-sufficiency.
- Provide job training programs for public residents to maintain full-time employment.
- Provide rent disincentives to encourage public housing residents to budget finances properly.
- Create networking opportunities for public housing residents to work with after they no longer need assistance.

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

- Provide the tools and education necessary for public housing residents to move toward the goal of self-sufficiency.
- Provide job training programs for public residents to maintain full-time employment.
- Provide rent disincentives to encourage public housing residents to budget finances properly.
- Create networking opportunities for public housing residents to work with after they no longer need assistance.

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

N/A

Discussion: None.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

DCF, through the ESG Program, provides funding for activities such as emergency shelters, street outreach and homeless prevention and rapid re-housing for homeless persons throughout Florida. Each of the funding categories has eligible activities that can be implemented with ESG funding to achieve annual goals and objectives. DOH, through the HOPWA Program, provides funding for short-term transitional and short-term and long-term housing activities for persons living with HIV/AIDS. The Florida Housing Finance Corporation, through the NHTF Program, will provide funding for permanent rental housing to serve households that are homeless or at risk of homelessness and/or have special needs, with property managers required to work with approved supportive service providers to seek these tenants. These three federal funding programs described in the 2015-2019 Consolidated Plan target specific segments of the special needs population in Florida, but the CDBG and HOME Programs do not directly fund special needs populations.

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 ESG Program is the only one of the five HUD-funded agency administered grant programs that relies on current homeless data and outreach strategies to create program goals objectives and performance measures, because it is the only program that bases its funding models on the current homeless person numbers and characteristics. The ESG Program administrators rely on the 27 CoC lead agencies throughout Florida to create and implement outreach strategies that are successful in their particular jurisdiction. The most implemented outreach strategy is the point-in-time (PIT) counts. PIT counts can be carried out in two ways: the survey method and the in-person interview method. For the survey method, the CoC lead agency will collect data from shelter service providers through the Homeless Management Information System regarding the number of sheltered homeless individuals on a specific night. For the in-person interview method, the CoC lead agency will employ surveyors to go out into the public to interview unsheltered homeless persons to collect data on the numbers and reasons for homelessness on a specific night.

Addressing the emergency shelter and transitional housing needs of homeless persons

The state will allocate up to 60 percent of the annual grant award to the emergency shelter component, which will fund local providers of emergency housing. CoC lead agencies will carry-out homeless services programs through collaboration and planning with local service providers in 2019.

Other transitional housing projects will be up for renewal grants in the CoC Notice of Funding Availability (NOFA) for 2019. Such housing units are critical to the homeless service plans, as the 13,540 transitional housing beds make up over one-third of the available homeless housing units in Florida.

To meet the safe shelter needs for victims of domestic violence, Florida provides more than \$31 million in state and federal grants to support 42 domestic violence centers, providing over 39,000 emergency shelter nights of care. State revenue sources provide more than \$12 million of the funding for these emergency shelters.

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

Much like the outreach strategies described in the paragraph above, the ESG Program relies on the 27 CoC agencies and their homeless service providers to provide the numbers and reasons for their respective jurisdiction's homeless population in relation to determining emergency and transitional housing needs of homeless persons. In order to address the emergency and transitional housing needs of homeless persons within a jurisdiction, the CoC agencies must provide current and concrete data to ensure that the appropriate amount of funding, depending on funding allocation availability, is distributed properly among the eligible grant categories. The CoC agencies are also responsible for creating strategies and providing services to homeless persons within their jurisdiction that promote self-sufficiency and access to more permanent housing options.

The CoC agencies within Florida implement a variety of programs that provide services to specific segments of the homeless populations including chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The ESG Program provides funds directly to CoC lead agencies for operation and maintenance of emergency shelters or transitional housing facilities. Other programs can include job training, housing counseling and other similar programs. Due to a shortage of direct federal program funding, the CoC agencies and their homeless services providers must seek other funding sources available through public- and private-sector resources, but are able to do so in order to implement their strategies to assist in promoting the transition into permanent housing and avoidance of being homeless once again. In addition, DCF provides other state funded programs assisting homeless persons and the prevention of homelessness. Specific strategies to promote self-sufficiency and transition out of homelessness include mental health and housing counseling services, job training, transitional housing with supportive services and permanent housing with temporary supportive services.

Homeless persons will also be assisted with the transition into permanent housing as a result of the creation of extremely affordable units set aside for homeless persons integrated into larger general occupancy through the NHTF Program. Tenants for these units will be referred by supportive services providers such as CoC agencies and other providers serving homeless persons.

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

There are a number of private nonprofit housing and supportive housing service providers throughout Florida that specifically assist individuals and families with low- and extremely low-incomes and implement strategies to avoid homelessness. The NHTF Program will provide additional opportunities for these providers to work with properties at NHTF-funded properties to transition persons being discharged from various facilities, programs and institutions to affordable, independent housing integrated into the community and with service supports from the referring supportive services provider and partners.

Many public housing authorities also implement programs and strategies for their clientele to receive the necessary support system to avoid becoming homeless and help them to achieve self-sufficiency. In regard to the state of Florida's efforts to assist in funding strategies and initiatives for this particular segment of the population, DCF works with public housing authorities and other housing and supportive housing services to identify at-risk individuals or families within the homeless population (extremely low-income or zero-negative income) and monitor their need for public services such as sufficient housing, healthcare, social services, employment, education and youth needs.

Discussion

None.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	1,375
Tenant-based rental assistance	279
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	428
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	164
Total	2,246

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

As a part of the Consolidated Plan process, the state of Florida prepared a report titled *2015 Analysis of Impediments to Fair Housing Choice*. The report evaluated potential barriers to affordable housing and included actions to be undertaken by the HUD-funded agencies to address any potential barriers identified. In developing the *Analysis to Impediments* report, the state of Florida conducted 10 public meetings throughout the state to gain public input from fair housing enforcement agencies, fair housing advocacy groups, local governments and the general public about perceived impediments that may affect fair housing choice in all regions of the state. One important aspect of the report was the review of Florida's statutes, regulations and policies that may have an effect on fair housing choice.

A review of Florida's statutes, regulations and policies showed that Chapter 163, Part II, F.S. Florida Community Planning Act (§§ 163.3161 - 163.3217, F.S.) and Chapter 760, Part II, F.S. Florida Fair Housing Act (§§ 760.20 - 760.37, F.S.) have the most influence on overcoming fair housing choice impediments in Florida.

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

The 2015 Analysis of Impediments to Fair Housing Choice plan contains a detailed list of actions for the state and local jurisdictions to minimize potential impediments to fair housing choices. Some specific examples of recommendations to address any potential barriers to affordable housing include the following:

- Publishing fair housing resource materials on agency websites in different languages,
- Expanding the usage of Section 8 housing assistance,
- Coordinating with the Florida Commission on Human Relations in conducting annual workshops on fair housing,
- Reviewing local comprehensive land use plans and amendments to ensure these plans contain policies regarding affordable housing,
- Requiring grant recipients to conduct quarterly fair housing activities, and
- Having a local fair housing coordinator to address complaints.

Discussion:

None.

AP-85 Other Actions – 91.320(j)

Introduction:

In this section of the Annual Action Plan we will examine the additional actions, if any, that will be developed and implemented by each of the five HUD-funded, state administered grant departments and agencies, for the purpose of expanding outreach to areas of Florida that have been identified as underserved, or have specific obstacles that must be addressed with program funding.

Actions planned to address obstacles to meeting underserved needs

DEO administers the CDBG Program, which serves the needs of its sub-grantees through the grants which are awarded. Applications that are submitted by these local governments are based on comments received at a local public hearing that allows citizens to identify their priority community needs and submit eligible projects for funding consideration.

DOH administers the HOPWA Program, which will remain involved in board activities of the Florida Supportive Housing Coalition. The Coalition and DOH are committed to creating long-term housing solutions for people with special needs in Florida, including persons living with HIV/AIDS. The board promotes the development of partnerships to create effective approaches to ending homelessness and solving the housing crisis in Florida. The statutorily-created State Council on Homelessness, a statewide workgroup of members that include the coalition board, members of multiple statewide partner coalitions and representatives from various state agencies (including DOH) will continue to convene.

DCF administers the ESG Program, which collaborates directly with Florida's 27 CoC lead agencies to identify areas with high concentrations of underserved homeless populations and use the information collected to update and implement strategies to overcome obstacles identified. The ESG Program will provide direct funding to the CoC lead agencies in the categories of emergency shelter and transitional housing activities, street outreach activities and permanent housing services. The CoC lead agencies have the option, when available, to supplement additional HUD program funding, such as the Shelter Plus Care Program, for the added benefit of achieving homeless housing goals and objectives.

FHFC administers the HOME and NHTF, which also serves on the Council on Homelessness and provides two important ways local governments and emerging nonprofits can learn more about and receive support on, affordable housing development issues. The Catalyst Program provides training and technical assistance on federal and state affordable housing programs, including HOME. FHFC contracts with nonprofit providers for this service. The Predevelopment Loan Program provides revolving loan funds to emerging nonprofits and PHAs interested in housing development and redevelopment. The program provides predevelopment loan funding to get a project started and technical assistance at no cost to the organization.

Actions planned to foster and maintain affordable housing

The CDBG Program does not fund affordable housing projects, but does provide grants for housing rehabilitation projects. Funded projects allow homeowners to remain in their homes and maintain the affordability of their homes.

The HOME Program provides program funding to produce and rehabilitate housing units for affordable homeownership and rental housing opportunities for low- and moderate-income beneficiaries for long-term affordability. Along with the HOME Program, FHFC uses a variety of other resources to provide affordable housing financing.

The goal of the NHTF Program is used in tandem with other affordable financing to add new units to the supply of decent, affordable rental units in Florida.

The goal of the HOPWA Program is to increase housing stability and improve the quality of life for clients and their families. The HOPWA Program achieves this goal by setting annual performance outcomes in the form of estimates of beneficiaries served and supportive services provided. In this 2019 Annual Action Plan, the HOPWA Program anticipates serving 1,940 beneficiaries with housing and supportive services with the intention of fostering and maintaining affordable housing.

Actions planned to reduce lead-based paint hazards

The DOH website provides a list of ways to prevent lead-based paint exposure:

- Determine the construction year of the house or dwelling where a child spends a large amount of time (e.g., grandparents or daycare);
- Consider testing the home for lead-based paint and dust by an Environmental Protection Agency (EPA) certified lead risk assessor or inspector;
- Make sure the child does not have access to chipping, peeling or chalking paint or chewable surfaces painted with lead-based paint;
- Create barriers between living/play areas and lead sources;
- Children and pregnant women should not be present during the renovation of a house built before 1978; and
- If considering renovation or repair work on a pre-1978 home, follow the EPA Lead-Safe Guide to Renovate Right.

DOH encourages the Renovation, Repair and Painting (RRP) Rule when considering renovations on any pre-1978 home. Also, the mission of Florida's Healthy Homes & Lead Poisoning Prevention Program (FHHLPPP) is to protect the health and cognitive development of all children living in Florida by eliminating childhood exposure to all lead hazards.

The CDBG Program requires all applications for housing rehabilitation projects to determine the age of the house. The program requires that any home constructed before January 1, 1978, be tested for lead-based paint. If lead-based paint is detected, appropriate measures must be taken to safely remove and dispose of the paint in accordance with HUD requirements.

No additional actions are planned to reduce lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

Response exceeds number of allowable characters, please refer to Unique Appendices.

Actions planned to develop institutional structure

No actions are planned to develop institutional structure.

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

Through the state's existing "Link Strategy," developers receiving finances through a number of FHFC's affordable rental development programs must reserve a small portion of units for tenants referred by an approved supportive services agency working in the community where the property is located. Populations served through this strategy include homeless persons and persons with special needs (including persons with disabilities, survivors of domestic violence and youth aging out of foster care). Properties financed with NHTF Program funding will also be required to implement this approach, with the addition of those at risk of homelessness being able to be served. FHFC is working with other state agencies to implement this strategy.

Discussion:

None

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The CDBG Program anticipates receiving \$72,500 in program income this year. The program will not receive any proceeds from Section 108 loan guarantees, and there are no urban renewal settlements, lines of credit or float-funded activities.

In the past three years, emergency set-aside funds have been awarded in response to state-declared emergencies, but the activities funded still benefitted LMI residents. The estimated percentage of CDBG funds that will be used for activities that benefit low- and moderate-income persons is 70 percent. There are no overall benefit projects anticipated.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(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	72,500
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:	72,500

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.	70.05%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)**

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

Response exceeds number of allowable characters, please refer to Unique Appendices.

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:

Response exceeds number of allowable characters, please refer to Unique Appendices.

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:

Response exceeds number of allowable characters, please refer to Unique Appendices.

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:

Response exceeds number of allowable characters, please refer to Unique Appendices.

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

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

Response exceeds number of allowable characters, please refer to 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.

Response exceeds number of allowable characters, please refer to Unique Appendices.

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).

Response exceeds number of allowable characters, please refer to Unique Appendices.

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.

Response exceeds number of allowable characters, please refer to Unique Appendices.

5. Describe performance standards for evaluating ESG.

Response exceeds number of allowable characters, please refer to Unique Appendices.

**Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A.

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

All applicants must meet specific mandatory items to be eligible for scoring. Not providing these requirements or providing them incorrectly will cause the application to be ineligible for funding. For RFAs that include NHTF funding, applicants must, in summary, meet the following threshold requirements in addition to the NHTF criteria described above: submission requirements, such as meeting the application deadline, submitting all required forms and paying the application fee, if there is one; completion of all required items in the application and submitting all required forms such as those showing local government signatures on availability of appropriate zoning and infrastructure; showing evidence of site control; meeting all funding requirements, such as not requesting funding over limits imposed in the RFA; submitting financing information, public and private funding commitments and a development cost pro forma and construction/permanent financing analysis; not be in financial arrearage in any existing property; meet minimum scores on any scored items in the RFA, if specified (scoring discussed below); and a multi-page certification signed by the applicant that includes the certifications described above in addition to others related to meeting the requirements of the RFA. In

partial summary, a certification and/or acknowledgement of the following: due dates for items to be submitted in credit underwriting if awarded financing; that all building codes, including Fair Housing Act, ADA and other required codes will be met; that the applicant's commitments will be included in a land use restriction agreement and, if applicable, an extended use agreement; that all required construction features, including green building requirements as specified in the RFA, will be addressed; that resident services programs committed to in credit underwriting will be implemented; that a memorandum of understanding with a supportive services referral agency under the state's "Link Strategy" will be executed and implemented and tenant selection plan will be developed and implemented that includes income and credit strategies recognizing that the ELI households to be served may have credit, income, criminal and rental histories that may be a barrier to tenancy at the property; that all financial requirements specified in the RFA will be met; that the third party information required for the RFA has been reviewed by the applicant and is accurate; and Cooperation with all audits.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In addition to applicable rules, statutes and RFA criteria, applications for funding submitted by eligible applicants will be reviewed according to the following NHTF criteria: provision of a description of the eligible activities to be conducted with HTF funds; the extent to which the application makes use of non-federal funding sources, the extent to which the proposed development has federal, state or local project based rental assistance, certification that the applicant understands that by receiving HTF funds they commit to set aside the required number of units in its property for the priority households of the HTF program and certify they will comply with the requirements of the HFT program and that the housing units will comply with HTF requirements; demonstrate their ability to obligate HTF funds and their experience and financial capacity to undertake, comply with and conduct eligible HTF activities and undertake HTF activities in a timely manner.

Additionally, with the exception of developments that mainly serve persons with special needs where the provision of supportive services is incorporated into a broader permanent supportive housing strategy, applicants for funding for general occupancy properties that include NHTF units will only be eligible for NHTF funding if they commit to participate in the state's "Link Strategy," which requires applicants awarded financing to work with at least one Special Needs Household Referral Agency working in that county that will refer eligible homeless, at-risk homeless or special needs households for residency in the NHTF-financed units.

Also, in order to be eligible for HTF funding, applicants also must commit to develop tenant selection plans that include strategies that demonstrate specific tenant selection and application strategies to address barriers to tenancy that the ELI households to be served may have with credit, income, criminal and rental histories.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Only applications that meet mandatory threshold items will be eligible for funding. The FHFC director appoints staff to a review committee. Each committee member independently evaluates and scores their assigned portions of the submitted applications, consulting with non-committee program staff and legal staff if necessary and appropriate.

At the review committee meeting, members read their scores or findings of threshold eligibility into the record. Once the committee knows which applications meet eligibility requirements, funding selection begins with that group of applications. First, eligible applications are ranked from highest to lowest scoring application, with any tied scores separated by tie-breakers. Depending on the funding being offered (programs may have different associated statutory criteria), tiebreakers can include: leveraging of program funds (required in particular for the SAIL program); eligibility for the Florida Job Creation Funding Preference (required by state law); and lottery number.

The applications are then selected to meet any goals specified in the RFA. To meet the goals, the committee reviews the list of ranked applications, choosing the highest ranked application that can meet the goals. In RFAs that include NHTF, goals will include requirements to select applications for new construction (since NHTF will not be used for rehabilitation, as discussed below). In addition, a “county award tally,” described above, is employed to disperse awards across counties as much as possible. Once funding is exhausted, the review committee finalizes its recommendations to present to the FHFC board.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The state of Florida will distribute NHTF funds by selecting applications submitted by eligible recipients on a competitive basis through FHFC’s RFA process. Funds will be made available in tandem with other financing to ensure geographic diversity, through an existing process that: proportionally aligns SAIL and Low-Income Housing Tax Credit funding with affordable rental needs in the state based on the most recent cost burden data provided through triennial market needs studies carried out by the Shimberg Center for Housing Studies at the University of Florida. Program funding is proportionally distributed across large, medium and small counties based on these findings. Florida is commonly divided into three broad regions: north, central and south. Three of the seven large counties are located in South Florida, three are located in Central Florida and one is located in North Florida. Medium and small counties are located in all three regions with North Florida having the greatest number of small counties; and within large, medium and small county groupings, Florida regularly uses a “county award

tally” to ensure that funding in each RFA is further distributed across as many counties as possible. For example, the tally might specify that once a development is awarded funding in a particular county, that county will not receive another development award unless eligible applications in all other counties have first been awarded.

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As part of the RFA Process, the applicant must demonstrate their ability to obligate NHTF funds, their experience and their financial capacity to undertake, comply with and conduct NHTF eligible activities. In addition, show familiarity with the requirements of other federal, state or local housing programs that will be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs through demonstrated experience with developing, owning and managing affordable multifamily rental housing developments. This will be done through the following: showing prior developer experience by requiring applicants to list development information for a minimum specified number (depends on the combination of program funding in the RFA) of prior developments financed and built through affordable housing programs. In addition, for developments that will primarily serve special needs tenants, applicants are evaluated on a development experience narrative they submit to explain their experience serving the subpopulation(s) targeted; showing prior operating/management experience by requiring applicants to list general management company information for a minimum specified number (depends on the combination of program funding in the RFA) of prior affordable rental developments. In addition, for developments that will primarily serve special needs tenants, applicants are evaluated on an operating/managing experience narrative they submit to explain their experience serving the subpopulation(s) targeted; showing active developments affiliated with applicants that financed through any FHFC programs are in compliance; showing that applicants have no financial arrearages in any FHFC programs the applicants are currently funded through.

The applicant must show ability to undertake eligible activities in a timely manner; that is, there must be a reasonable expectation that the development will be placed in service within 24 months, which is typically outlined in closing agreements. The most critical way this is measured is the experience threshold described above.

f. Describe the grantee’s required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Florida will prioritize applications for funding which are able to maintain units affordable to ELI

households for at least 30 years without project based rental assistance. Florida's experience indicates that combining capital subsidies for ELI units with project based rental assistance is wasteful and limits the total number of units available to ELI households. Maximizing the number of units affordable to ELI households was a goal of Florida Housing long before Congress created the NHTF. For many years, Florida Housing worked to finance as many new ELI rental units as possible, because the need for these units is high. The rental programs administered by FHFC are competitive; consequently, the state is able to encourage the inclusion of project based rental assistance in developments without the addition of NHTF. Rather than using both types of funding to finance new ELI units, the state's objective is to create additional units with NHTF. Thus, Florida will not prioritize applications which utilize project based rental assistance. FHFC established the maximum per-unit NHTF subsidy limits in this plan at a level that ensures that properties funded with NHTF will require less debt financing. With less hard-pay debt service, NHTF funded properties will have sufficient cash flow to support the ELI units for 30 years.

Where this cross-subsidization is insufficient, FHFC expects applicants to establish an operating deficit reserve to offset projected operating losses from ELI units identified during underwriting. Operating deficit reserves may be funded with NHTF and/or from other sources. No more than one-third of the state's NHTF award will be used to fund operating deficit reserves.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The NHTF-designated units must remain affordable to ELI households through a Land Use Restriction Agreement for no less than 30 years. FHFC will not incentivize a longer affordability period for these units at the 22 percent of area median income level, but will require the units to remain affordable at or below 60 percent of area median income after the first 30 years for an additional 20-year period. After 30 years, the property will require rehabilitation, but because of the limitations on operating income even from the 60 percent of area median income units, recapitalization will be difficult without financing from FHFC and/or the private sector, which may require more flexible approach to the income levels served. Any units in the development with affordability restrictions must remain affordable at 60 percent of area median income levels for 50 years. FHFC's approach to providing refinancing to older properties is to require additional units to be set aside to serve ELI tenants; thus, while we cannot know the economic and real estate markets and programs in 30 years, under today's approach these properties would be targeted with refinancing to maintain affordability for ELI tenants.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

RFAs also include scored items. RFAs providing financing for general occupancy properties that include a few NHTF units will include the following scoring opportunities based on information submitted by applicants: a score for a minimum local government financial contribution, as specified in the RFA, based on the size of the local government (higher contributions are required from bigger local governments that have access to more local housing dollars); a transit score, measuring the proposed development's proximity to public bus stops, bus rapid transit stops, or rail stops – the closer the proposed development is to transit, the more points received and the more intense the transit (rail or bus rapid transit compared to a regular bus stop), the higher the score; and a proximity score, measuring the proposed development's nearness to such resources as grocery stores, medical facilities, pharmacies and public schools, with a higher score for proposed developments that are closer to these resources.

RFAs offering financing for homeless or special needs populations provide opportunities for applicants to provide narratives describing: the population(s) to be served; the applicant's experience in developing and managing properties for these populations; access to public or other transit; proximity to shopping, employment, education and recreation; access to community based supportive services; and tenant selection policies and approach.

Because of FHFC's exacting RFA requirements, applications which meet all threshold mandatory criteria and any additional scoring criteria will be eligible for selection according to the scoring criteria in the RFA. Any of these eligible applications will be deemed to meet the state's priority housing needs, particularly those relating to serving extremely low-income persons with special needs.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In the RFA, applicants will be reviewed in accordance with the specific RFA criteria which will include the extent to which the application makes use of non-federal funding sources as compared to total units in the proposed development (leveraging factor). This may be measured by different methods, depending on the other funding being blended with NHTF. For example, FHFC can calculate the leveraging factor using any of these types of subsidies: The amount of any financial contribution from the local government to the development; the amount of SAIL or other state funding in the development; and/or the amount of other non-governmental sources of funding in the development, such as private or nonprofit loans or grants.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low-Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

These limits are based on compilation of data about non-luxury developments and reasonable land costs around the state through years of administering Multifamily Mortgage Revenue Bonds, state gap funding, Low Income Housing Tax Credits and other program funding, combined with information about the current cost environments in these areas. The limits specify different amounts based on three geographic cost regions of the state, as well as five development types, ranging from garden-style wood apartments to high rise concrete buildings. FHFC updates its cost limitations regularly based on current actual contracts that deliver affordable housing units, inclusive of any required green features; industry review; construction trends; and stakeholder feedback.

The limits developed by FHFC are based on historic information and analysis of two components in considering an appropriate maximum: the cost to acquire land and develop a property and the level and cost of the debt associated with the property, which differs by program.

The typical sources of financing in an affordable rental development in Florida include bonds, state gap financing, housing credit equity, a traditional first mortgage, local government resources and a deferred developer fee. The housing credit equity does not have any repayment requirements and the local government resources are typically cash flow dependent. The objective of providing NHTF funding is to lower any loan or other debt on a property to ensure that the development is financially feasible.

All developments receiving NHTF awards will be subject to credit underwriting and undergo a subsidy layering review to ensure that financing awarded is no greater than what is needed to make the development financially feasible. FHFC may specify lower NHTF maximum limits in specific RFAs.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

FHFC will only use HTF funds on the development of new construction rental units.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A.

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The state of Florida will give a preference to the following segments of the ELI population, which will also be integrated into the written agreements with the recipients of NHTF: persons and households with incomes at or below 22 percent of area median income in order to serve those at or near the Supplemental Security Income (also known as SSI) level and that are persons with special needs, defined in Florida Statute at 420.0004(13); and/or homeless persons and households, defined in Florida Statute at 420.621(5) or persons and families at risk of homelessness.

These households have limited access to high quality, affordable housing and few new units of housing or rental assistance affordable to these residents are being made available. Households that receive SSI as their only income are at median income levels of approximately 22 percent. Using the most recent census data, there are approximately 162,000 cost burdened renter households (i.e., those paying more than 30 percent of one’s income for rent and utilities) with incomes up to 20 percent of area median income in Florida. In a June 2016 evaluation of resident incomes served throughout FHFC’s rental portfolio, out of 154,000 units reporting, only 63 were targeted to renters with incomes this low, because current programs are not financially structured in such a way to allow rents to be low enough

to serve this income group. Targeting households at this level would allow Florida to add a new lower income level to the Florida ELI units already being financed through state housing programs.

Florida will prioritize use of NHTF funds for developments that commit to integrate a small number of NHTF-funded units serving the populations described above into various types of properties, including general occupancy affordable housing properties serving family and elderly households with a range of incomes up to 60 percent of area median income in most cases, properties that serve a range of demographic populations and properties that are targeted to persons with special needs or who are homeless. NHTF-financed units will comprise only a small portion of total units in any property, but may be in addition to other Florida ELI units provided at the property. NHTF funding will be blended with other program financing, such as Multifamily Mortgage Revenue Bonds and State Apartment Incentive Loan (SAIL) gap funds, to finance general occupancy properties that include these units. Any development that has more than five NHTF-assisted units will be required to submit an Affirmative Marketing procedures in accordance with the requirements at § 93.350, together with the signed written agreement.

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A.

Discussion:

Please see the Unique Appendices for the NHTF Maximum Per-Unit Development Subsidy Amounts.

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ANNUAL ACTION PLAN

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The Small Cities Community Development Block Grant (CDBG) Program will receive \$27,511,368 in funding for federal fiscal year 2019. Of the total funding allocation, \$100,000 (unmatched) plus 2.50 percent (matched with general revenue) will be spent on administration activities, 0.5 percent will be spent on Training and Technical Assistance and 4 percent will be allocated to emergency set-aside activities. That leaves approximately \$25,485,572 available for the four eligible funding categories in the annual competitive application cycle. The Florida Small Cities CDBG Program, administered by the Florida Department of Economic Opportunity (DEO), prioritized the funds for each category by percentage. The funding percentages for each category were determined by analyzing past requests for funding and from public input on the Consolidated Plan collected during the five public meetings.

Additionally, the Small Cities Community Development Block Grant (CDBG) Program will receive \$16,660,264 (less any administration or technical assistance costs) in CDBG-CV Round One funding and \$63,170,132 (less any administration or technical assistance costs) in CDBG-CV Round Two funding. The total CDBG-CV funding allocation, as well as, some portion or all of the FFY19 CDBG funding allocation will be used to prevent, prepare for and respond to COVID-19. DEO will reserve a portion of the funding, up to the amount allowed by HUD, on administration and training and technical assistance activities.

Consolidated Plan survey results received indicate a high priority for affordable rental housing and owner-occupied housing rehabilitation, as well as stormwater drainage and street improvements for all regions in Florida. These survey results were used in determining how the funds were allocated. For the fifth fiscal year (2019) of the 2015-2019 Consolidated Plan, funding percentages and dollar amounts for each category are as follows: Neighborhood Revitalization \$9,786,460 (38.4 percent), Housing Rehabilitation \$6,371,393 (25 percent), Economic Development \$7,645,672 (30 percent) and Commercial Revitalization \$1,682,048 (6.6 percent).

The Emergency Solutions Grant (ESG) Program will receive a total allocation of \$5,500,348 in funding for fiscal year 2019. Of the total funding allocation available to local continuum lead agencies for allocation to homeless prevention and emergency shelters in their areas, Continuum of Care (CoC) lead agencies will provide at least 40 percent of available funding to homeless prevention programs and no more than five percent of the project award on administrative activities. Funds will be distributed as Homeless Prevention Grants to those agencies who provide direct assistance to families at risk of homelessness or those who are homeless, for costs associated with data collection and coordination to provide services consistent with the CoC Plans to address homelessness. The Office on Homelessness will maintain for its costs the balance of allowable administrative costs for the administration of the ESG Grant and of other grant funded programs that serve housing, program or service needs included within the CoC Plans of the 27 Continuums of Care.

The HOME Partnerships (HOME) Program will receive a total allocation of \$17,881,000 in funding for fiscal year 2019. Of the total funding allocation, \$2,682,150 will be reserved for development that are sponsored by qualified Community Housing Development Organization (CHDO) applicants. In the event insufficient applications meeting the threshold are received to allocate the anticipated amount to rental developments, the remaining unallocated may be shifted to homeownership activities. The same applies to homeownership activities, so the remaining unallocated funds may be shifted to rental activities. The remaining funds allocated will be awarded via a Request for Application (RFA) process or a reservation system based on the appropriate rule chapters, or through one or more demonstration projects that create affordable rental and homeownership opportunities through construction or rehabilitation of housing units, through tenant-based rental assistance, or direct homebuyer assistance. The total annual allocation of \$1,788,100 will be used by the Florida Housing Finance Corporation (FHFC) HOME program for administrative costs pursuant to 24 CFR § 92.207.

The Housing Opportunities for Persons With AIDS (HOPWA) Program has been allocated \$7,748,771* in funding for fiscal year 2019. Of the total funding allocation, \$7,516,308 (97 percent) of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent of the median family income for the area served. Eligible activities include rental payments, security deposits, and utility allowances to promote housing opportunities for persons with HIV/AIDS. The remaining 3 percent of the funding will be spent on administrative activities carried out by DOH. *This amount includes additional funds for eligible metropolitan statistical areas (EMSAs), which may or may not re-designate their allocation back to the state. As such, this number may be reduced should they choose to administer their grants locally.

The National Housing Trust Fund (NHTF) Program will receive a total allocation of \$9,414,324 for fiscal year 2019. Ninety percent of this funding, or \$8,472,892 will be made available in tandem with other affordable rental financing through a Request for Applications process for developments that commit to providing a small portion of extremely low-income units that meet NHTF Program requirements. Ten percent of the total allocation, or \$941,432 will be used by FHFC for administrative costs.

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 CDBG Program does not require matching funds, but the state administered program does award up to 25 bonus points in housing rehabilitation, neighborhood revitalization and commercial revitalization applications and up to 125 bonus points if leveraged funds are included.

The HOME Program requires participating jurisdictions to provide match funds in an amount equal to no less than 25 percent of the total HOME funds drawn down for project costs. Match is a permanent contribution to affordable housing. However, match is not leveraging. Match is the

participating jurisdiction's contribution to the HOME Program the local, non-federal contribution to the partnership.

The federal ESG Program requires match for all direct recipients. However, 24 CFR § 576.201 (a)(2) states that "If a recipient is a state, the first \$100,000 of the fiscal year grant is not required to be matched. However, the recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions." Types of acceptable matching contributions include third-party cash match or in-kind contributions.

Neither the federal nor the state HOPWA Programs require match contributions to be leveraged toward funding allocations.

The NHTF Program does not require matching funds; instead NHTF Program funds will be made available in tandem with other affordable financing, which may include Multifamily Mortgage Revenue Bonds, Low Income Housing Tax Credits, state Apartment Incentive Loan Program or HOME Investment Partnerships program funds, as part of a comprehensive annual funding plan adopted by FHFC's Board of Directors. NHTF Program funding will assist in creating financing opportunities with some or all of the programs listed here to enable assisted units to serve more extremely low-income residents than could be done by each program separately.

AP- 25 Allocation Priorities – 91.320(d)

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

Performance objectives for communities served by the CDBG Program are entered into the U.S. Department of Housing and Urban Development's (HUD) Integrated Disbursement Information System (IDIS) when awards are made, and the final accomplishments and beneficiaries are reported when projects are completed. The composite objectives of subgrantees comprise the state's overall objectives.

The CDBG Program will address **the needs of communities to prevent, prepare for and respond to coronavirus with its federal fiscal year (FFY) 2019 allocation. Any remaining FFY 2019 funds will address** three primary objectives: ~~with its federal fiscal year (FFY) 2019 allocation:~~

1. Creating economic opportunities,
2. Creating a suitable living environment, and
3. Providing affordable housing.

These objectives will result in ~~four~~ **five** major outcomes:

1. **Improve the ability to prepare for, prevent and respond to the spread of infectious diseases such as the coronavirus.**
2. Improve the local economy,
3. Reduce poverty through job creation,
4. Improve neighborhoods, and

5. Improve sustainability by promoting viable communities.

In preparing their CDBG and CDBG-CV applications, local eligible communities hold public meetings to determine their community's priority needs, and then prepare and submit an application for funding in one of the four funding categories of eligible activities. Therefore, specific performance objectives can only be determined when the applications are received, scored and a grant is awarded.

The ESG Program will address three primary objectives with its FFY 2019 allocation:

1. Increase street outreach to homeless persons (especially unsheltered),
2. Increase availability of emergency shelters and transitional housing to homeless persons (especially families with children), and
3. Increase the availability of homeless prevention services to persons and families at risk of homelessness.

The HOME Program will address three primary objectives with its FFY 2019 allocation:

1. Increase rental through CHDOs for persons and families at, or below, 60 percent area median income (AMI),
2. Increase affordable rental housing activities through construction of new rental housing units or through tenant-based rental assistance for persons and families at or below 60 percent AMI, and
3. Increase affordable ownership housing activities through direct financial assistance to homebuyers at or below 80 percent AMI.

The state HOPWA Program will address three primary objectives with its FFY 2019 allocation:

1. Establish or better maintain a stable living environment
2. Reduce the risk of homelessness among people living with HIV/AIDS and their families
3. Transition homeless individuals or families into stable housing as well as create a strategy for long-term housing stability for persons living with HIV/AIDS.

The NHTF Program will address one primary objective with its FFY 2019 allocation: to increase affordable rental housing activities for extremely low-income households, with a preference for those who are homeless, at risk of homelessness and/or have special needs.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Acceptance process of applications

The Section 108 loan guarantee application, review and approval process is outlined in rule 73C-23.0071, Florida Administrative Code. This rule is provided below:

(1) Eligibility.

- (a) Municipalities and counties on U.S. Department of Housing and Urban Development's (HUD) list of non-entitlement local governments in Florida are eligible to apply for Section 108 loans

guaranteed by the state of Florida's current and future Small Cities Community Development Block Grant allocations.

- (b) Any project proposed for funding through the Small Cities Community Development Block Grant Loan Guarantee Program must be located within the jurisdictional boundaries of the non-entitlement local government that is applying for the loan.
- (c) Section 108 loan requests must meet one of the three National Objectives to be eligible for consideration.

(2) Application Process.

- (a) Eligible non-entitlement local governments wanting to receive assistance through the Small Cities Community Development Block Grant Loan Guarantee Program may apply at any time during the year. The following application process must be followed:

1. The non-entitlement local government completes the Section 108 Pre-Application Questionnaire, Form SC-58, <http://www.flrules.org/Gateway/reference.asp?No=Ref-05349>; effective date: April 2015, which is hereby adopted and incorporated by reference, and submits it to the department for review.
2. Following the department's review and acceptance of the local government's responses to the Section 108 Pre-Application Questionnaire [sic], the local government requests a screening meeting with the department. The meeting is held to determine if the proposed project meets all program requirements.
3. If the department determines that the project is eligible for further consideration, the local government is invited to submit an loan request that contains the information required in 42 USC 5308, effective [sic] date: February 3, 2015, which is available at <http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title42-section5308&num=0&edition=prelim>, and which is incorporated herein by reference and 24 CFR part 570, subpart M. The local government must provide documentation to the Department that it has met the Citizen Participation requirements detailed in paragraph 73C- 23.0041(1), F.A.C., with the exception that it only has to provide a project summary and draft budget at the second public hearing.
4. The local government then prepares its Section 108 loan application and submits it to the department for review. The application narrative must describe how the proposed project will meet a national objective and the public benefit standards, and it must document that the proposed activities are eligible for funding. The narrative shall also include a detailed budget showing all sources and uses of funds, a repayment (amortization) schedule, required local government certifications, proof of proper citizen's participation and site control (if applicable), background information on project partners, maps and other supporting documentation to illustrate the specifics of the proposed project. Projects which propose a loan(s) to a third party(ies) shall include letters of commitment from all funding sources evidencing sufficient non-loan funds are available to complete the project. For economic development projects, these commitments shall include those stated in Part 5 of the Economic Development section of the Florida Small Cities Community Development Block Grant Application for Funding, Form SC-60, as incorporated in subsection 73C-23.0030(2)(b), F.A.C., under the "Initial Participating Party Commitments" section.

5. Upon receipt of the application, the department conducts a “due diligence and compliance” review of the application. The department determines whether the application is eligible for funding and financially feasible, ineligible for funding or financially infeasible.
6. The local government shall have a third party complete a detailed underwriting analysis of the proposed project in accordance with 24 CFR 570.482(e)(2) and Appendix A of 24 CFR Part 570, as incorporated in Rule 73C-23.00310, F.A.C.
 - a. The department shall retain the right to approve the third party underwriter and the method of analysis and to enforce adherence to the guidelines in 24 CFR 570.482(e)(2) and Appendix A, as incorporated in Rule 73C-23.00310, F.A.C. The department shall require additional underwriting standards, criteria or review when it appears that the proposed project is not economically feasible.
 - b. The client for the underwriter is the department; however, the cost for the underwriting analysis is the responsibility of the applying local government or its partner(s).
 - c. The department shall be provided the underwriting analysis prior to the final application package being sent to HUD Office in Jacksonville. The department reserves the right to require additional information from the local government, the underwriter and/or the third party to whom a loan is proposed, when it appears that the proposed project is not economically feasible. Once a financial underwriting analysis and other required documentation has been provided by the local government, any material change, including changes in corporate or ownership structure, which affects the underlying assumptions upon which the local government relied, will require that the underwriting analysis be re-evaluated by the local government and the underwriter and any assistance requested for the Participating Party must be adjusted if a material change that affects the conclusions of the underwriter has occurred.
 - d. Should the project be approved and funded, the cost for underwriting analysis may be reimbursed from loan proceeds to the entity incurring the cost. This reimbursement requires an up-front letter of request to incur pre-agreement costs from the applying local government, delivered to the department prior to incurring the costs.

(3) Site Visit and Contracting Period.

- (a) The department will conduct a site visit following review and acceptance of the final application package. For projects which propose loans to a third party(ies), a representative(s) of the third party(ies) shall attend the site visit or shall meet with department staff within 30 days of the site visit at the CDBG Office in Tallahassee.
- (b) The local government shall submit a fully executed Participating Party Agreement(s) that meet(s) the requirements set out in Part 5 of the Florida Small Cities Community Development Block Grant Application for Funding, Form SC-60, as incorporated in Rule 73C-23.00310, F.A.C.
- (c) The local government and the department shall execute an agreement that outlines the state’s requirements for administering the Section 108 loan and includes a Program Budget and an Activity Work Plan.
- (d) The department, HUD and the local government sign the HUD Section 108 Loan Guarantee

Agreement.

(4) Administration and Reporting.

- (a) The local government shall copy the department on all written correspondence with HUD, the underwriter, the Participating Party and all other involved parties.
- (b) The local government shall provide the department with quarterly progress reports until the project is administratively closed. This report shall include documentation in a form acceptable to the department of the project's draws and repayments, accomplishments to date, and updates on previous areas of concern as determined by the department.
- (c) The local government shall provide documentation and reporting of Minority and Women Business Enterprise participation and Section 3 compliance until the project is administratively closed.
- (d) The local government shall meet the requirements of 2 CFR 200.501.
- (e) The department shall monitor the local government and project partners to ensure compliance with a National Objective and the public benefit standards, as well as all applicable federal and state regulations.
- (f) The local government shall provide the department with documentation of each loan payment made to HUD throughout the life of the Section 108 loan.

AP-50 Geographic Distribution – 91.320(f)

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

The CDBG Program does not allocate funding resources geographically. Instead, each year a Notice of Funding Availability (NOFA) is published inviting eligible non-entitlement municipalities and counties to submit an application for funding consideration. There are four program areas: economic development, housing rehabilitation, neighborhood revitalization and commercial revitalization. Before submitting an application, the local government must conduct a public hearing to receive input on what they consider is the community's highest priority need. Based on this information, the local government selects a project for funding and prepares an application for one of the four program areas. CDBG staff reviews the applications received in each program category and ranks them from the highest to the lowest score. Funding is awarded from the highest to the lowest ranked application until there are no funds available.

The CDBG-CV program allocates funding to eligible entitlement and non-entitlement communities based on needs, capacity, and factors such as the number of COVID-19 cases or low- to moderate-income population or using a HUD formula allocation methodology.

CDBG-CV Entitlement Community Program: For entitlement communities, eligible applicants are encouraged to coordinate with local governments within their program. Local governments within entitlement communities that participate in the entitlement program are not eligible to apply for funding directly to the state. Entitlement communities will apply for programs related to COVID-19

response and recovery that can include rehabilitation and construction of publicly-owned facilities; planning and capacity building; public services; public infrastructure to promote economic development; and assistance to businesses that employ low- to moderate-income individuals, and other eligible CDBG-CV activities. Based on a needs and capacity review application process, funds will be awarded up to the amount of the entitlement community's allocation.

CDBG-CV Non-Entitlement Community Program: The Non-Entitlement Community Program will be funded through (1) the CDBG-CV Round One allocation in the amount of \$16,660,264; (2) the CDBG-CV Round Two allocation based on the formula distribution; and (3) supplemented with additional funds, based on need, available through the FFY 2019 Small Cities CDBG program. The CDBG-CV Round Two allocation formula will distribute dollars to the non-entitlement community program as a whole. The Method of Distribution will then be determined through a competitive application process.

The Non-Entitlement Community Program and activities will closely align with the current competitive Small Cities CDBG program. Eligible applicants will include non-entitlement communities who are included in the non-entitlement eligible communities list. Eligible activities may include rehabilitation and construction of publicly-owned facilities; planning and capacity building; and public infrastructure to promote economic development. Applications will be awarded based on score and eligible project readiness.

Allowing the local governments to establish their priority need, based on the above-described process, is beneficial to CDBG subgrantees. It allows the DEO to be more flexible in funding projects that are responsive to the local communities' changing needs rather than require a community to submit a project based on a priority established by the state that may not be a priority need in a local community, or may result in a community not submitting an application because the state established priority is not responsive to their local priority need.

The ESG Program is a formula grant program based upon the demographics of Florida's counties and cities. The state receives the grant funds directly from HUD and subgrants the ESG funds to units of general purpose local government and/or nonprofit organizations. Eligible beneficiaries must meet the "homeless" definition in 24 CFR § 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR § 576.104. Local governments have the freedom to establish further eligibility criteria for program beneficiaries in accordance with 24 CFR § 576.400(e). All local government and nonprofit recipients shall consult with the CoC agencies operating within their jurisdiction before determining how ESG funds are allocated.

HOME Program funds are allocated to provide necessary financial support for various activities, creating long-term affordable, safe, decent and sanitary housing for very low- and low-income persons and households. FHFC works with both the public-and private-sector throughout the state to assist in meeting the needs of affordable housing, particularly in rural areas when development capacity exists. FHFC distributes HOME funds either through a RFA process, a reservation system or by demonstration.

The NHTF Program described in this plan will base its statewide allocation distribution on geographical factors that will be part of a comprehensive annual funding plan adopted by FHFC's Board of Directors

to distribute financing across geographic areas of the state based on the need for rental housing in each area. To ensure geographic distribution and to respond to rental needs studies carried out by and for FHFC, funding will be offered through RFAs in large counties (825,000+ population), medium counties (>100,000 and <825,000 population) and small counties (up to 100,000 population) over a period of three to five years.

DOH currently contracts with 11 project sponsors to administer the HOPWA Program in designated geographic areas, the majority of which are rural. Ten of Florida's 14 Ryan White Part B consortia/planning bodies provide recommendations for needs assessments, planning, and prioritization for state HOPWA funds. The six consortia/planning body areas not listed are eligible metropolitan statistical areas (EMSAs) that receive funding directly from HUD. The state program provides funds for HOPWA services in 51 of Florida's 67 counties. The EMSAs, including those administered by the state, provide services for the remaining 16 counties.

The current project sponsors for HOPWA funds and the counties that are served are listed below:

1. Lutheran Services Florida, Inc., Northwest (Escambia, Okaloosa, Santa Rosa, and Walton counties)
2. BASIC NWFL, Inc. (Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties)
3. Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, and Wakulla counties)
4. WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee, and Union counties)
5. Florida Department of Health-Hillsborough (Manatee County)
6. United Way of Brevard County, Inc. (Brevard County)
7. Health Planning Council of Southwest Florida, Inc. (Charlotte, Collier, DeSoto, Glades, Hendry, Lee, and Sarasota counties)
8. Florida Department of Health-Monroe (Monroe County)
9. Florida Department of Health-Volusia (Flagler and Volusia counties)
10. Florida Department of Health-Polk (Highlands, Hardee, and Polk counties)
11. Florida Department of Health-St. Lucie (Indian River, Martin, Okeechobee, and St. Lucie counties)

AP-85 Other Actions – 91.320(j)

Actions planned to reduce the number of poverty-level families

Florida's anti-poverty strategies are carried out by programs administered by several state agencies. Agency rules and related regulations set out the goals and objectives of the programs. The Department of Children and Families (DCF) is the state agency responsible for the distribution of food stamps and temporary assistance to needy families (TANF). The state provides these services as a temporary means to assist families in need. DEO provides reemployment assistance and job placement services.

DEO provides reemployment assistance, job search and career planning assistance and resources to assist businesses and entrepreneurs create jobs and establish businesses in Florida. The CDBG Program funds economic development projects and requires that 51 percent of the jobs created be made available to low- to moderate-income workers. Job training is also required, at no expense to the employee, if skills above a high school education are required.

Anti-poverty activities fall within several categories including the following: financial literacy, education and training, benefit coordination and safety net programs.

Types of financial literacy programs include the Florida Financial Literacy Council and the Florida Prosperity Partnership (FPP). The Florida Financial Literacy Council develops recommendations to aid the Florida Department of Financial Services in developing programs and resources aimed at increasing financial literacy among Floridians. The FPP is a coalition of county governments dedicated to creating unified, coordinated and collaborative statewide effort to educate, train and put money directly back into the hands of Florida citizens to increase financial stability for low- and moderate-income families.

Types of Education and Training programs include Florida Dislocation Workers Reemployment and Emergency Assistance Coordination (REACT), Food Stamp Employment and Training Program (FSET), Job Corps and Veteran's Workforce Program. REACT provides assistance to regional workforce development boards, local government officials, employers and workers for technical assistance and expertise, labor market statistics and job relocation services. FSET emphasizes work, self-sufficiency and personal responsibility by providing temporary financial assistance and job training. Job Corps assist economically disadvantaged young adults to become responsible, employable and productive citizens by providing them with opportunities to develop vocational, educational and social skills needed to succeed. The Veteran's Workforce Program provides priority workforce services to veteran customers in the one-stop career centers around the state.

Types of safety net programs include reemployment assistance and temporary assistance to needy families. The reemployment assistance programs provide temporary, partial wage replacement benefits to qualified workers who are unemployed through no fault of their own. The temporary assistance to needy families' program emphasizes work, self-sufficiency and personal responsibility structured to

enable participants to move from welfare to economic self-sufficiency. Other types of safety net programs include CDBG, HOME, ESG and HOPWA. These HUD funded programs provide funding for jurisdictions to carry out activities such as housing rehabilitation, emergency shelter assistance and housing opportunities for persons with HIV/AIDS for low- to moderate-income households.

No additional actions are planned to reduce the number of poverty-level families.

AP-90 Program Specific Requirements – HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

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

FHFC does not use any other forms of investment with HOME Program funds other than those described in 24 CFR § 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:

Funds that are loaned to an eligible borrower in conjunction with the Homeownership Loan Program competitive cycle and the Homeownership Pool Program will conform to the following guidelines:

A. At the time of purchase, the initial buyer must satisfy the two following criteria:

1. Must be a low-income family (have an income of 80 percent or less of the median income for the area), and
 2. Must occupy the acquired property as the principal residence.
- HOME-assisted units shall comply with the purchase price limitation requirements in CFR 24 § 92.254. Eligible homebuyers can receive a zero percent interest rate, deferred payment, subordinate mortgage loan. Repayment of the loan, in accordance with these recapture provisions, is expected if (1) the borrower sells, transfers, or disposes of the assisted unit (either by sale transfer, bankruptcy, foreclosure, or the like), (2) the borrower or a co-borrower dies, and as a result title to the property is transferred to a non-borrower, or (3) the loan matures.
 - 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:

FHFC utilizes option (ii) under 24 CFR § 92.254(a)(5)(ii), as its method of recapturing HOME Program funds under any Homebuyer Program the state administers. Resale is not currently utilized. If resale is to be used in the future, the plan will be amended.

A. FHFC will recapture the entire amount of the HOME Investment in the property. If the sale of the unit does not have sufficient proceeds to cover the original HOME investment, the amount recaptured will be the net proceeds (i.e., the sales price minus superior loan repayment, other than HOME funds and closing costs). This method of recapture will be identified in the down payment assistance documents which include a homebuyer agreement with FHFC, promissory note and recorded subordinate mortgage.

Period of Affordability

The recapture provisions are in effect for a period of affordability. This period is based on the amount of direct HOME subsidy to the buyer, as follows:

Amount of HOME funds that were direct subsidy to buyer	Period of affordability
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

Principal Residency

The initial buyer must reside in the home as his/her principal residence for the duration of the period of affordability.

Triggering Recapture of HOME funds

If, during the period of affordability, an owner voluntarily or involuntarily transfers his/her property (e.g., through a sale or foreclosure), these recapture provisions go into effect.

The amount subject to recapture is the direct HOME subsidy.

The direct HOME subsidy is the total amount of HOME assistance that enables the buyer to purchase the unit, including a down payment, closing cost assistance and the amount that reduces the purchase price from fair market value to an affordable price.

FHFC can never recapture more than the amount of available net proceeds upon sale. Net proceeds are the sales price of the home minus superior loan repayment (not including HOME loans) and any closing costs.

Noncompliance

During the affordability period, noncompliance occurs when an owner vacates the unit or rents the unit to another household, or sells or transfers the home without FHFC receiving recaptured

funds due at time of sale. In the event of noncompliance, the owner is subject to repay any outstanding HOME funds invested in the housing. Repayment is based on the total amount of HOME funds invested, including both development funds and direct subsidy to the buyer minus any principal HOME loan repayments.

3. 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 that will be used under 24 CFR 92.206(b)

FHFC has no plans to utilize this financing structure.

AP-90 Program Specific Requirements- Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

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

In accordance with the option provided in the federal rule to state recipients, the Department of Children and Families (DCF) shall require the local grantees to establish and implement the written standards required under 24 CFR § 576.400(e)(2). The local grantees shall establish their written standards, and submit them to the DCF for review and approval. The approval by DCF is required prior to the execution of the grant agreement with the local grantee.

DCF's transfer of the responsibility to establish the written standards to the local grantee is consistent with Florida's homeless enabling statutes. In accordance with section 420.624, Florida Statutes, homeless services are intended to be tailored to the unique needs of each community. The homeless planning shall be done at the community level, as is the delivery of services and housing to those in need.

For 2019, the local recipients of the ESG shall develop the following written standards. All such standards shall be consistent with the provisions specified by HUD in the December 5, 2011, Interim Rule.

Required Written Standards

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under the ESG.

Minimum Standards: (1) Consistency with the definition of homeless and at-risk homeless set forth in 24 CFR § 576.2; (2) The record keeping requirements in 24 CFR § 576.500 (b)-(e).

DCF's Limitation: For the 2014 awards, local recipients shall not use the risk factor for homelessness allowed under 24 CFR § 576.2 related to an individual, who "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness."

- b. Policies and procedures for coordination among homeless service providers, as well as mainstream service and housing providers.

Minimum Standards: Standard shall encompass all providers and programs listed in 24 CFR § 576.400(b)-(c).

- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homeless prevention assistance or Rapid Re-Housing aid.

DCF's Priority: Families with children, as well as youth exiting from state care, shall be given preference under the DCF's awards for both prevention and rapid re-housing, to the maximum extent possible.

- d. Standards for determining the share of rent and utilities cost that each eligible participant must pay, if any, while receiving either homeless prevention or rapid re-housing aid.
- e. Standards for determining how long a particular participant will be provided with rental assistance, and whether and how the amount of assistance may be adjusted overtime.

Minimum Standard: In accordance with the 24 CFR § 576, no participant may receive more than 24 months of assistance in any three-year period.

DCF Standard: Local grantees shall not obligate any assistance beyond the term of 24 months.

- f. Standards for determining the type, amount and duration of housing stabilization and/or rapid re-housing assistance and/or relocation services to be provided to an eligible participant, including limits, if any, on the amount of homeless prevention or rapid re-housing assistance that a participant may receive. The standards shall set forth the maximum amount of assistance, the maximum number of months of assistance possible and maximum number of times a participant may receive assistance.

Minimum Standard: 24 CFR § 576 limits cannot be violated by the local standard.

- g. Standards for targeting and providing essential services to the unsheltered homeless persons related to street outreach activities.
- h. Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG. This must include standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, such as victims of domestic violence. Such standards shall also address the individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- i. Policies and procedures for assessing, prioritizing and reassessing individuals' and families' needs for essential services related to emergency shelter.

All recipients must develop the written standards required in (a) and (b) above. Street outreach recipients shall also develop and submit for approval the written standards in (g) above. Emergency shelter recipients must develop the standards described in (h) and (i) above. Homeless prevention and rapid re-housing recipients must develop the standards required in (c), (d), (e) and (f) above.

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 state of Florida does not have a balance of state CoC planning area. Rather, there are 27 local CoC planning areas, covering 64 of Florida's 67 counties each with their own coordinated entry system.

The ESG Program shall require all applicants to submit in their grant proposal, a specific certification that the applying agency is using the CoC's assessment system. Victim service providers may choose not to use the continuum's coordinated assessment system. If so, the victim service provider shall document this decision in writing.

Florida does not have a balance of state CoC plan, and therefore DCF has not established a coordinated assessment system and instead works with local CoC lead agencies to develop this system as required by 24 CFR § 576.400(d).

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).

For 2019, DCF will competitively award grants for the ESG under three grant categories.

1. Emergency shelters
2. Street outreach
3. Prevention and rapid re-housing

DCF shall make funds available to local CoC lead agencies in the state, where grant funded activities will be carried out and serve eligible participants.

DCF will detail the grant application requirements in its grant solicitation. DCF will make a maximum grant award of \$400,000 to lead agencies that may sub-contract to local governments and nonprofit direct service providers to carry-out programs consistent with CoC Plans. The project awards shall make available at least 40 percent of the funding for homeless prevention activities. The lead agencies will determine with the approval of the Office on Homelessness, the funding for proposed direct service providers.

DCF will establish maximum grant awards for each of the grant categories. DCF reserves the

right to make awards at levels less than the maximum level, if deemed in the best interest of the state. Those limits shall cover the base award limit, plus an administrative cost amount of no more than five percent of the grant category award. All applicants shall cover the cost of contributing participant data to the CoC HMIS database, and may cover these eligible costs under the grant category award limit.

DCF shall give priority to its grant awards to applicants which shall carry out the grant funded activities in the non-formula cities and counties in the state. Exception: CoC lead agencies in formula jurisdictions/areas, may conduct activities in exception cities or carry-out eligible components not receiving direct awards to perform.

DCF shall publish the notice of grant solicitations using the state of Florida's Vendor Bid System. Such notice shall announce the dates for the submission of grant proposals. The department will provide a completeness review of all applications to identify missing information that is required. Applicants will be provided an opportunity to provide the missing information prior to the evaluation of the application.

Grant awards will be made by the DCF based on the determination of which proposals are in the best interest of the state of Florida. Applications will be evaluated according to capacity and performance criteria, which shall serve as a recommendation for consideration by the DCF's Secretary, or designee, in making the grant award decision determined to be in the best interest of the state.

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.

If a sub-recipient of a grant from DCF does not meet the requirements for homeless participation on its policymaking body, and in staffing the activities funded by the grant, then DCF shall require the recipient to develop and implement a plan to comply with the federal requirement. The corrective action plan shall be a condition for receipt of payment under DCF's grant award.

Applicants seeking funding from DCF shall be governed by the requirements in 24 CFR § 576.405 of the HUD Interim Rule.

5. Describe performance standards for evaluating ESG. Performance Goals

The following performance measures are proposed to be used jointly by DCF and the CoC planning lead agency to assess the performance of DCF's funded recipients under the 2019 ESG. Recipients will be required to provide copies of DCF required reports to the lead agency at the same time the report is due to DCF.

Emergency Shelter Recipients

Performance Goals:

1. Reduction in the unsheltered homeless population of the CoCarea.
2. Reduction in the recipients' average length of stay for clients served in the shelter.
3. Percentage increase of persons exiting the shelter who transition to permanenthousing.
4. Percentage increase of persons exiting the shelter who leave with employment income.
5. Percentage decrease of persons who exit and return to homelessness within three months.

Street outreach recipients

Performance Goals:

1. Percentage increase of clients assessed who are successfully placed inhousing.
2. Reduction in the number of unsheltered homeless persons in the CoCarea.
3. Reduction in the average length of time of a person's homeless episode in the CoCarea.
4. Percentage increase of clients assisted who were able to receive mainstream benefits, like ACCESS Program benefits.

Prevention and rapid re-housing recipients

Performance Goals:

1. Reduction in the number of households with children who are homeless in the CoC area, or reduction in the number of unaccompanied youth in the CoC.
2. At least 35 percent of the participants served remained in permanent housing six months following the last assistance provided under the grant.

National Housing Trust Fund Allocation Plan for Florida

Florida's FY 2019 HTF Allocation Amount: \$9,414,324

Introduction

The NHTF is a new federal affordable housing production program that will complement existing state efforts to increase the supply of affordable housing for extremely low- and very low-income households. Congress established the NHTF through the Housing and Economic Recovery Act of 2008. On January 30, 2015, HUD published an [Interim Rule](#), which guides implementation of the NHTF by the states. HUD plans to issue a final rule for the NHTF after states have had experience administering the program and are able to offer comments regarding the initial implementation.

In years that total NHTF funding exceeds \$1 billion nationally, at least 75 percent of each state's

allocation must benefit households at or below the federal extremely low-income (ELI) level, which is 30 percent of area median income, or households with incomes below federal poverty level, whichever is greater.¹ In Florida, the ELI level is greater than the federal poverty level. Up to 25 percent may be used to benefit very low-income households (those at or below 50 percent of area median income). However, in years when total national funding is less than \$1 billion, 100 percent of each state's allocation must benefit ELI households. In 2019, the total amount of funds available for the national trust fund is \$219.2 million. Thus, it is likely that the program will serve 100 percent ELI households for the foreseeable future.

The Governor has designated Florida Housing Finance Corporation (FHFC) as the entity to administer the NHTF program in Florida.

State Preference for Use of NHTF - (§ 91.320(k)(5)(vii))

The state may limit the beneficiaries or give preferences to a particular segment of the ELI population. The state may also allow rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3). However, these limitations or preferences must be described in this plan and are as follows:

The state of Florida will give a preference to the following segments of the ELI population, which will also be integrated into the written agreements with the recipients of NHTF:

- Persons and households with incomes at or below 22 percent of area median income in order to serve those at or near the Supplemental Security Income (also known as SSI) level² and that are;
- Persons with special needs, defined in [Florida Statute](#) at 420.0004(13); and/or
- Homeless persons and households, defined in [Florida Statute](#) at 420.621(5); or
- Persons and families at risk of homelessness.

¹ In some of its programs, Florida Housing utilizes a different "Florida ELI" level based on the Florida minimum wage. All references to ELI in this plan refer to the federal ELI level of up to 30 percent of area median income.

² For context, the SSI income level is currently \$8,796 per year for a single occupancy household.

These households have limited access to high quality, affordable housing and few new units of housing or rental assistance affordable to these residents are being made available. Households that receive SSI as their only income are at median income levels of approximately 22 percent. Using the most recent census data, there are approximately 162,000 cost burdened renter households (i.e., those paying more than 30 percent of one's income for rent and utilities) with incomes up to 20 percent of area median income in Florida. In a June 2016 evaluation of resident incomes served throughout FHFC's rental portfolio, out of 154,000 units reporting, only 63 were targeted to renters with incomes this low, because current programs are not financially structured in such a way to allow rents to be low enough to serve this income group. Targeting households at this level would allow Florida to add a new lower income level to the Florida ELI units already being financed through state housing programs.

Florida will prioritize use of NHTF funds for developments that commit to integrate a small number of NHTF-funded units serving the populations described above into various types of properties, including general occupancy affordable housing properties serving family and elderly households with a range of incomes up to 60 percent of area median income in most cases,³ properties that serve a range of demographic populations and properties that are targeted to persons with special needs or who are homeless. NHTF-financed units will comprise only a small portion of total units in any property, but may be in addition to other Florida ELI units provided at the property. NHTF funding will be blended with other program financing, such as Multifamily Mortgage Revenue Bonds and State Apartment Incentive Loan (SAIL) gap funds,⁴ to finance general occupancy properties that include these units. Any development that has more than five NHTF-assisted units will be required to submit an Affirmative Marketing procedures in accordance with the requirements at § 93.350, together with the signed written agreement.

NHTF Funding Priorities - § 91.320(k)(5)(i)

The funding priorities and selection criteria of particular importance to the NHTF program are described in the next two sections. Then the plan provides a broader overview of how these mandatory, threshold criteria will fit into the broader funding selection process implemented by FHFC.

The populations that are prioritized to be served by NHTF are described in the prior section. The state of Florida will distribute NHTF funds by selecting applications submitted by eligible recipients on a competitive basis through FHFC's Request for Applications (RFA) process. Funds will be made available in tandem with other financing to ensure geographic diversity, through an existing process that:

³ "Family" properties are general occupancy properties that serve households of any size and age. "Elder" properties are general occupancy properties that serve households of any size, but set aside all or most units for elders. At these properties, the head of household must be 55 or older.

⁴ SAIL is a state program (section 420.5087, Florida Statutes) that is used to finance rental development, and is used as gap financing with mortgage revenue bonds and 9% Low Income Housing Tax Credits, or on its own when financing very small properties.

- Proportionally aligns SAIL and Low-Income Housing Tax Credit funding with affordable rental needs in the state based on the most recent cost burden data provided through triennial market needs studies carried out by the Shimberg Center for Housing Studies at the University of Florida. Program funding is proportionally distributed across Large, Medium and Small counties based on these findings.⁵ Florida is commonly divided into three broad regions: north, central and south. Three of the seven large counties are located in South Florida, three are located in Central Florida and one is located in North Florida. Medium and small counties are located in all three regions with North Florida having the greatest number of small counties; and
- Within large, medium and small county groupings, Florida regularly uses a “county award tally” to ensure that funding in each RFA is further distributed across as many counties as possible. For example, the tally might specify that once a development is awarded funding in a particular county, that county will not receive another development award unless eligible applications in all other counties have first been awarded.

These RFAs will make financing available directly to recipients submitting applications to develop rental developments that meet the criteria outlined in this allocation plan and criteria required by federal and state statute and rules governing other programs included in the RFA. These RFAs will be part of a comprehensive annual funding plan that is adopted by FHFC’s Board of Directors to distribute all competitive FHFC program financing across geographic areas of the state based on the need for rental housing in each area. A total of about 15 RFAs are issued every year.

The Florida Housing Board of Directors will make funding selections based on recommendations from a staff review committee which will score all applications. The following NHTF threshold criteria must be met by all applicants to be considered for funding selection:

- The development must be permanent rental housing – that is, it must provide a permanent home to residents who meet all lease requirements – and each NHTF-designated unit may have no more than two bedrooms;⁶
- The NHTF-designated units must remain affordable to ELI households through a Land Use Restriction Agreement for no less than 30 years. FHFC will not incentivize a longer affordability period for these units at the 22 percent of area median income level, but will require the units to remain affordable at or below 60 percent of area median income after the first 30 years for an additional 20-year period. After 30 years, the property will require rehabilitation, but because of the limitations on operating income even from the 60 percent of area median income units, recapitalization will be difficult without financing from FHFC and/or the private

⁵ Pursuant to Section 420.5087, Florida Statutes, Large counties are those with a population of 825,000 or more; Medium counties are those with a population of more than 100,000, but less than 825,000; and Small counties are those with a population of 100,000 or less.

⁶ Most of the state’s 22 percent of area median income, special needs households are made up of 1-2 people.

sector, which may require more flexible approach to the income levels served. Any units in the development with affordability restrictions must remain affordable at 60 percent of area median income levels for 50 years. FHFC's approach to providing refinancing to older properties is to require additional units to be set aside to serve ELI tenants; thus, while we cannot know the economic and real estate markets and programs in 30 years, under today's approach these properties would be targeted with refinancing to maintain affordability for ELI tenants.

Recipient Application Requirements - § 91.320(k)(5)(ii)

In addition to applicable rules, statutes and RFA criteria, applications for funding submitted by eligible applicants will be reviewed according to the following NHTF criteria:

- Provision of a description of the eligible activities to be conducted with the NHTF funds;
- The extent to which the application makes use of non-federal funding sources as compared to total units in the proposed development (leveraging factor). This may be measured by different methods, depending on the other funding being blended with NHTF. For example, FHFC can calculate the leveraging factor using any of these types of subsidies below:
 - The amount of any financial contribution from the local government to the development;
 - The amount of SAIL or other state funding in the development; and/or
 - The amount of other non-governmental sources of funding in the development, such as private or nonprofit loans or grants; and
- Florida will allow the use of federal, state or local project-based rental assistance in NHTF set-aside units to ensure that the rents are affordable to extremely low-income families.

Applicants for NHTF funding must meet minimum qualifications and demonstrate their proficiency as developers and asset managers. In their applications or before preliminary loan awards receive final approval, eligible recipients must meet these threshold requirements related to NHTF. If any of these requirements are not met, the applicant will not be awarded financing:

- Sign a certification that they understand that by receiving NHTF funds, they commit to set aside the required number of units in its property for the priority households specified in this plan; and sign a certification that they will comply with the requirements of the NHTF program and that housing units assisted with the NHTF will comply with NHTF requirements.
- Demonstrate their ability to obligate NHTF funds, their experience and their financial capacity to undertake, comply with and conduct NHTF eligible activities. In addition, show familiarity with the requirements of other federal, state or local housing programs that will be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs through demonstrated experience with developing, owning and managing affordable multifamily rental housing developments. This will be done through the following:
 - Showing prior developer experience by requiring applicants to list development information

for a minimum specified number (depends on the combination of program funding in the

RFA) of prior developments financed and built through affordable housing programs. In addition, for developments that will primarily serve special needs tenants, applicants are evaluated on a development experience narrative they submit to explain their experience serving the subpopulation(s) targeted;

- Showing prior operating/management experience by requiring applicants to list general management company information for a minimum specified number (depends on the combination of program funding in the RFA) of prior affordable rental developments. In addition, for developments that will primarily serve special needs tenants, applicants are evaluated on an operating/managing experience narrative they submit to explain their experience serving the subpopulation(s) targeted;
- Showing active developments affiliated with applicants that financed through any FHFC programs are in compliance;
- Showing that applicants have no financial arrearages in any FHFC programs the applicants are currently funded through.
- Showing its ability to undertake eligible activities in a timely manner; that is, there must be a reasonable expectation that the development will be placed in service within 24 months, which is typically outlined in closing agreements. The most critical way this is measured is the experience threshold described above.

Additional NHTF Threshold Selection Criteria. With the exception of developments that mainly serve persons with special needs where the provision of supportive services is incorporated into a broader permanent supportive housing strategy, applicants for funding for general occupancy properties that include NHTF units will only be eligible for NHTF funding if they commit to participate in the state’s “Link Strategy,” which requires applicants awarded financing to work with at least one Special Needs Household Referral Agency working in that county that will refer eligible homeless, at-risk homeless or special needs households for residency in the NHTF-financed units.

In order to be eligible for NHTF funding, applicants also must commit to develop tenant selection plans that include strategies that demonstrate specific tenant selection and application strategies to address barriers to tenancy that the ELI households to be served may have with credit, income, criminal and rental histories.

Scoring RFA Applications that include NHTF Funds

RFAs issued by FHFC typically have three elements to determine funding selection: threshold criteria that are mandatory to meet to be considered for funding, including the NHTF criteria above and augmented by more general criteria summarized below; scored items that allow applications to be ranked for funding selection, including tiebreakers; and finally, any RFA goals or additional funding selection criteria used to choose applications for funding. These categories are detailed below.

Mandatory Threshold Items. All applicants must meet specific mandatory items to be eligible for scoring. Not providing these requirements or providing them incorrectly will cause the application to not be eligible for funding. For RFAs that include NHTF funding, applicants must, in summary, meet the

following threshold requirements in addition to the NHTF criteria described above:

- Submission requirements, such as meeting the application deadline, submitting all required forms and paying the application fee, if there is one;
- Completion of all required items in the application and submitting all required forms such as those showing local government signatures on availability of appropriate zoning and infrastructure;
- Showing evidence of site control;
- Meeting all funding requirements, such as requesting funding within the limits imposed in the RFA; submitting financing information, public and private funding commitments and a development cost pro forma and construction/permanent financing analysis;
- Not be in financial arrearage in any existing property;
- Meet minimum scores on any scored items in the RFA, if specified (scoring discussed below); and
- A multi-page certification signed by the applicant that includes the certifications described above in addition to others related to meeting the requirements of the RFA. In partial summary, a certification and/or acknowledgement of the following:
 - Due dates for items to be submitted in credit underwriting if awarded financing;
 - That all building codes, including Fair Housing Act, ADA and other required codes will be met;
 - That the applicant's commitments will be included in a land use restriction agreement and, if applicable, an extended use agreement;
 - That all required construction features, including green building requirements as specified in the RFA, will be addressed;
 - That resident services programs committed to in credit underwriting will be implemented;
 - That a memorandum of understanding with a supportive services referral agency under the state's "Link Strategy" will be executed and implemented, and tenant selection plan will be developed and implemented that includes income and credit strategies recognizing that the ELI households to be served may have credit, income, criminal and rental histories that may be a barrier to tenancy at the property;
 - That all financial requirements specified in the RFA will be met;
 - That the third-party information required for the RFA has been reviewed by the applicant and is accurate; and
 - Cooperation with all audits.

Scored Items. RFAs also include scored items. RFAs providing financing for general occupancy properties that include a few NHTF units will include the following scoring opportunities based on information submitted by applicants:

- A score for a minimum local government financial contribution, as specified in the RFA, based on the size of the local government (higher contributions are required from bigger local governments that have access to more local housing dollars);
- A transit score, measuring the proposed development's proximity to public bus stops, bus rapid transit stops, or rail stops – the closer the proposed development is to transit, the more points received and the more intense the transit (rail or bus rapid transit compared to a regular bus stop), the higher the score; and
- A proximity score, measuring the proposed development's nearness to such resources as grocery stores, medical facilities, pharmacies and public schools, with a higher score for proposed developments that are closer to these resources.

RFAs offering financing for homeless or special needs populations provide opportunities for applicants to provide narratives describing:

- The population(s) to be served,
- The applicant's experience in developing and managing properties for these populations,
- Access to public or other transit,
- Proximity to shopping, employment, education and recreation,
- Access to community based supportive services, and
- Tenant selection policies and approach.

Funding Selection. Only applications that meet mandatory threshold items will be eligible for funding. The FHFC director appoints staff to a review committee. Each committee member independently evaluates and scores their assigned portions of the submitted applications, consulting with non-committee program staff and legal staff as necessary and appropriate.

At the review committee meeting, members read their scores or findings of threshold eligibility into the record. Once the committee knows which applications meet eligibility requirements, funding selection begins with that group of applications. First, eligible applications are ranked from highest to lowest scoring application, with any tied scores separated by tie-breakers. Depending on the funding being offered (programs may have different associated statutory criteria), tiebreakers can include:

- Leveraging of program funds (required in particular for the SAIL program),
- Eligibility for the Florida Job Creation Funding Preference (required by state law), and
- Lottery number.

Then applications are first selected to meet any goals specified in the RFA. To meet the goals, the review committee goes down the list of ranked applications, choosing the highest ranked application that can meet the goals. In RFAs that include NHTF, goals will include requirements to select applications for new construction (since NHTF will not be used for rehabilitation, as discussed below). In addition, a “county award tally,” described above, is employed to disperse awards across counties as much as possible.

Once funding is exhausted, the review committee finalizes its recommendations to present to the FHFC board.

Merits of NHTF applications in meeting the state’s priority housing needs. Because of FHFC’s exacting RFA requirements, applications which meet all threshold mandatory criteria and any additional scoring criteria will be eligible for selection according to the scoring criteria in the RFA. Any of these eligible applications will be deemed to meet the state’s priority housing needs, particularly those relating to serving extremely low-income persons with special needs.

Use of NHTF Funds

Florida will use NHTF project funds to pay for all or some of the following eligible costs: development hard costs, demolition, acquisition of real property, related soft costs and operating deficit reserves (not to exceed one-third of the state’s annual allocation). Awards of NHTF funds will be made in the form of 0 percent, 30-year forgivable loans in order to minimize project debt and maximize affordability to ELI households. Funding will be allocated only for new construction, including redevelopment in which a new property is built to replace a demolished property. If demolition of occupied units is required, Tenant Relocation Information is required at the time of application per the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Up to 10 percent of the state’s NHTF allocation will be used for administration, as allowed by NHTF regulations.

Rehabilitation Standards - § 91.320(k)(5)(iv) and § 93.301(b) – NHTF funds will not be used for rehabilitation of housing.

Resale and/or Recapture Provisions - § 91.320(k)(5)(v) and § 93.304(f) and HTF Affordable Homeownership Limits - § 91.320(k)(5)(vi) and § 93.305 – NHTF funds will not be used to assist first-time homebuyers.

Refinancing of Existing Debt - § 91.320(k)(5)(viii) and § 93.201(b) – NHTF funding will not be used for the refinancing of existing debt.

Maximum Per-Unit Development Subsidy Amount - § 91.320(k)(5) and § 93.300(a)

The maximum per-unit NHTF subsidy limit is provided in the table below for zero, one and two bedrooms, based on three geographic locations as specified. Units with more bedrooms will not be financed with NHTF funds.

NHTF Maximum Per-Unit Development Subsidy Amounts

Maximum Subsidy Limits for 0-1 Bedroom Units – New Construction Only			
Construction Type	Miami-Dade, Broward, Palm Beach Counties	Monroe County	Remainder of Florida
Garden – Wood	N/A	N/A	\$185,500
Garden – Concrete	\$239,300	\$336,800	\$218,000
Mid-Rise – Wood	N/A	N/A	\$218,000
Mid-Rise – Concrete	\$260,300	\$367,300	\$237,800
High-Rise	\$309,200	N/A	\$284,000

Maximum Subsidy Limits for 2 Bedroom Units – New Construction Only			
Construction Type	Miami-Dade, Broward, Palm Beach Counties	Monroe County	Remainder of Florida
Garden – Wood	N/A	N/A	\$213,800
Garden – Concrete	\$275,400	\$389,200	\$252,000
Mid-Rise – Wood	N/A	N/A	\$252,000
Mid-Rise – Concrete	\$300,000	\$425,100	\$275,300
High-Rise	\$357,600	N/A	\$329,700
Add this factor to the all above limits if a development is subject to the requirements of the Davis-Bacon Act			\$5,000

* N/A means the Construction Type is not allowed or is inappropriate for the location.

These limits are based on compilation of data about non-luxury developments and reasonable land costs around the state through years of administering Multifamily Mortgage Revenue Bonds, state gap funding, Low Income Housing Tax Credits and other program funding, combined with information about the current cost environments in these areas. The limits specify different amounts based on three geographic cost regions of the state, as well as five development types, ranging from garden-style wood apartments to high rise concrete buildings. FHFC updates its cost limitations regularly based on current actual contracts that deliver affordable housing units, inclusive of any required green features; industry review; construction trends; and stakeholder feedback.

The limits developed by FHFC are based on historic information and analysis of two components in considering an appropriate maximum: the cost to acquire land and develop a property and the level and cost of the debt associated with the property, which differs by program.

The typical sources of financing in an affordable rental development in Florida include bonds, state gap financing, housing credit equity, a traditional first mortgage, local government resources and a deferred developer fee. The housing credit equity does not have any repayment requirements and the local government resources are typically cash flow dependent. The objective of providing NHTF funding is to lower any loan or other debt on a property to ensure that the development is financially feasible.

All developments receiving NHTF awards will be subject to credit underwriting and undergo a subsidy layering review to ensure that financing awarded is no greater than what is needed to make the development financially feasible. FHFC may specify lower NHTF maximum limits in specific RFAs.

CITIZEN PARTICIPATION PLAN

Citizen Participation

Florida's Citizen Participation Plan encourages involvement of citizens as well as representatives of agencies and organizations that share an interest in the issues or serve the clientele for which HUD funding is intended. The plan requires that public meetings be held, that a public comment period be provided on certain documents and that timely response be made to comments or complaints. It requires participation with other agencies, nonprofits, citizen groups and interested parties.

All state agencies utilize the Florida Administrative Register (FAR), a publication of the Department of State, to provide public notice of meetings, hearings, funding announcements and reports. This publication reaches state agencies, local governments, nonprofit organizations and major lobbying groups. It facilitates citizen participation by providing concise information that can be transmitted to interested parties. Further, state agencies now have web sites where information is posted on funding cycles, application deadlines, public hearings and meetings.

Although the state of Florida's administration of HUD funds differs significantly from the manner in which local jurisdictions administer entitlement funds, it encourages the participation of residents of public and assisted housing developments and recipients of tenant-based assistance in the process of developing and implementing the Consolidated Plan (ConPlan), along with other low-income residents of targeted revitalization areas in which the developments are located. The state of Florida makes an effort to provide information to all housing agencies about consolidated plan activities.

The following agencies and organizations are among those who actively participated in the development of the 2015-2019 ConPlan:

- Florida Department of Economic Opportunity
- Florida Department of Children and Families, Office on Homelessness
- Florida Department of Health, HIV/AIDS Section
- Florida Housing Finance Corporation, HOME Investment

Public Hearings and Other Actions

The department utilized a series of workgroup meetings that were open to the public in the development of the 2015-2019 ConPlan. The initial meeting addressed plan requirements and the need for public participation. At the second meeting, committees were formed and were assigned sections of the plan to research and review. Upon completion of the draft, two public hearings were conducted. The following reflects the meeting schedule used for the process:

In an effort to achieve maximum participation, announcements were published in the FAR, posted to the department's web site and emailed to interested parties (including state and local government agencies, nonprofit organizations, homeless coalitions, social service agencies, etc.). The announcements indicated that persons requiring special accommodations (because of a disability, physical impairment or language barrier) should contact the department prior to the meetings. Rooms used for the meetings were accessible to the disabled, and no special arrangements were requested. The department urged agencies and interested parties to submit written comments.

Action Steps

Before the state of Florida submits the final state Consolidated Plan or the Annual Action Plan to HUD, it shall make available to citizens, units of local governments, public and private agencies and other interested parties, the following information:

- Amount of assistance in the CDBG, ESG, HOPWA, HOME and NHTF Programs that the state of Florida expects to receive;
- Range of activities that may be undertaken in the covered programs;
- Estimate of the amount of assistance that will benefit persons of very low- and low-income;
- Plans to minimize displacement of persons and assistance available to those persons who may be displaced.

Notice of Hearings and Access to Meetings

- Notice of actions subject to the citizen participation requirements shall be given to all interested parties by means any of the following:
- Notice published in the Florida Administrative Register.
- Notice posted to the agency's website.
- Notice emailed directly to all persons, agencies, or parties expressing interest in the following programs: Small Cities CDBG, HOME, ESG and HOPWA.

In accordance with the CARES Act provisions, expedited procedures are in place that include a minimum notice and reasonable opportunity to comment of no less than 5 days. The 5-day period runs concurrently for comments on the FFY 2019 action plan substantial amendment and amended citizen participation plan. In-person public hearings are not required, rather public hearing requirements are met with virtual public hearings with reasonable notification and access for

citizens, timely responses to all citizen questions and issues, and public access to all questions and responses.

At such time as national/local health authorities determine that social distancing and limiting public gatherings for health reasons are no longer necessary, a minimum notice of 15 days will be provided prior to work group meetings and/or public hearings where actions subject to the citizen participation requirement will be recommended or taken. Public hearings may be referred to as work group meetings.

All public notices will contain the name and telephone number of a person to contact if special accommodation is needed due to a disability or language barrier. The notice may require a five-day advance notice for special accommodations. The department will ensure that any non-English speaking person can participate in the consolidated planning process and comment on documents produced. This may include the presence of translators at virtual or in-person meetings and the translation of summary documents. The notice will also contain the name and telephone number of a person to contact for additional information about the topic that is being addressed. All notices shall provide the name and address of an individual who will receive comments if the public is being offered an opportunity to make comments. If appropriate, a deadline date will be indicated.

Public Hearings, Publishing the Plan and Comments

At a minimum, the state shall conduct public hearings to solicit public comment on the following:

All required elements of the Consolidated Plan:

- The state shall hold at least one public hearing or work group meeting (open to the public) during the preparation of the state Consolidated Plan.
- An additional hearing shall be conducted after a draft has been completed to receive final comments.
- A draft will be posted to the web site and kept so that the public has electronic access. In addition, summary plan information or copies of the plan will be made available upon request.
- The state shall provide all interested persons, agencies or organizations a minimum of 30-days to comment on the draft plan, any amendment to the plan or performance report once that document has been formally noticed as available for review and comment. This 30-day review period shall be run prior to the submission of the document to HUD.
- All written comments shall be acknowledged in writing within 30 days. A summary of written comments and the state of Florida's responses will be incorporated into the plan. The summary of citizen comments will include an explanation as to whether or not the comments were accepted and why.
- The department will ensure that any non-English speaking person, or disabled person, can participate in the consolidated planning process and comment on documents produced. This may include the presence of translators at meetings and the translation of summary documents.

Any amendment to the Consolidated Plan:

- Amendments are submitted concurrently with the Annual Action Plan where possible and are noticed, with **virtual or in-person** hearings held, in the same manner as those prescribed for the Annual Action Plan.

All elements of the Annual Action Plan and Annual Performance Report:

- The state shall hold at least one **virtual or in-person** public hearing or work group meeting (open to the public) during the preparation of the Annual Action Plan to receive comments from interested parties.
- A draft of the Annual Action Plan shall be posted to the agency website and made available to the public upon request.
- The public shall be given 30 days in which to comment on the Annual Action Plan prior to its submission to HUD.
- A draft of the Annual Performance Report shall be posted to the agency website and made available to the public upon request. A notice will be posted that states that the public shall be given 15 days in which to comment on the Annual Performance Report prior to its submission to HUD.
- All written comments will be acknowledged in writing within 15 days. A summary of written comments and the State's response will be incorporated provided. The summary will include a written explanation of comments not accepted and the reasons why the comments were not accepted.
- The department will ensure that any disabled or non-English speaking person can participate in the consolidated planning process and comment on documents produced. This may include the presence of translators at meetings and the translation of summary documents.

Substantial Amendments

Prior to the submission of any substantial change in the proposed use of funds, the public will have reasonable notice of, and opportunity to comment on, the proposed amendment. The following actions constitute a substantial amendment to the plan, subject to citizen participation requirements:

- Any modification to the method of distribution of funding in any of the programs covered by the plan, or
- Any change to the strategies, priority needs and objectives in the state Consolidated Plan.

Individual Program Citizen Participation

The Citizen Participation Plan governing the state's Consolidated Plan shall be considered as additional citizen participation requirements applicable to the individual programs and shall not be considered as requirements in lieu of or in place of any other applicable requirement. For example, where state agency rule-making is required to implement a program, the minimum requirements for public notice and public hearings for agency rule-making pursuant the Florida Administrative Procedures Act (Chapter 120, Florida Statutes), shall not be modified in any way. Similarly, where the Florida Statutes require certain citizen participation activities, those shall not be eliminated or altered in any way. However, this Citizen Participation Plan for the Consolidated Plan, required by federal regulations, shall not contain nor restate those program-specific requirements for citizen participation.

Access to Information

Florida's "Government in the Sunshine" and "Open Records" laws apply to all programs administered by state agencies. These laws ensure that records are available for public inspection upon request and that citizens are informed about governmental activities. All records and information on the use of funds in the CDBG, ESG, HOPWA, HOME and NHTF Programs administered by the state shall be available for public inspection during normal working hours. Requests for extensive data or records access may be scheduled by the appropriate state agency at a reasonable time. Records shall be maintained for a period of six-years for the programs covered by the state Consolidated Plan. They should be maintained within the programs' official offices for a two-year period and then sent for the remainder of the four-year period to the state of Florida's records management center. Florida law also requires that services be made accessible to handicapped persons. All state agencies that receive HUD funds comply with federal and state regulations relating to the accessibility of information and require that subgrantees and other service providers take steps to remove barriers to accessibility that may exists within their administrative offices or buildings that are addressed with federal or state funds.

Citizens, public agencies and other interested parties, including those most affected, are provided information upon request. All files relating to the preparation of the documents covered by the consolidated planning process are available for public inspection. The files document the process used to develop the document. Files are available for public inspection during regular business hours. The HUD-funded programs provide copies of the proposed and adopted Annual Action Plan, Consolidated Plan and Annual Performance Report, along with any supporting documentation, to the public in a timely manner and at reasonable or no cost.

Complaints

The state shall record and respond in writing to all citizen complaints within 15 days of receipt. This response will be provided to complaints regarding the proposed state Consolidated Plan, the final state Consolidated Plan, amendments to the state Consolidated Plan, the Annual Action Plan and the Annual Performance Report. The state shall establish a file of all citizen complaints, along with the written response, on the proposed state Consolidated Plan, the final state Consolidated Plan, the Annual Action Plan and the Annual Performance Report. The file shall be available to the public upon request.

The state shall refer any complaints regarding program implementation at the local level to the appropriate state sub-recipient or agency responsible for the delivery of the services, and shall require that entity to respond in writing to the complainant within 15 days with a copy of the written response provided to the state. If the state does not feel that the response is adequate, it will determine the most appropriate action to take. All responses whether provided by the state or sub-recipient must be responsive to the issue.