

The purpose of this new plan and substantial amendments to the state of Florida's 5-year Consolidated Plan and 2016 Annual Action is to include the new National Housing Trust Fund (NHTF) program as part of the suite of now five federal programs administered by the state of Florida.

## **Executive Summary**

### **ES-05 Executive Summary - 91.300(c), 91.320(b)**

#### **1. Introduction**

The U. S. Department of Housing and Urban Development (HUD) requires that states receiving annual block grant funds from HUD for affordable housing and community development projects prepare a Consolidated Plan pursuant to requirements established in the Code of Federal Regulations, 24 CFR 91. The Florida Department of Economic Opportunity administers the Small Cities Community Development Block Grant (CDBG) program, the Florida Department of Health administers the Housing Opportunities for Persons with AIDS Grant (HOPWA) program, the Florida Department of Children and Families administers the Emergency Solutions Grant (ESG) program, and the Florida Housing Finance Corporation administers the HOME Partnerships Program (HOME) and will administer the National Housing Trust Fund Program (NHTF) beginning in 2016. The State of Florida's Consolidated Plan is for the five-year period from July 1, 2015, through June 30, 2020.

The Needs Assessment and Market Analysis sections of the Consolidated Plan 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 to be 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 Consolidated Plan also includes a First-Year Action Plan. The First-Year Action Plan describes the activities that will be undertaken in the first year to address the priority needs and marking progress toward meeting the Strategic Plan goals.

#### **Lead Agency and Interagency Work Group**

The Florida Department of Economic Opportunity is the lead agency responsible for overseeing the development of the plan. This document was developed and prepared through a consultant, Langton Associates, Inc. and the cooperative efforts of the Florida Department of Children and Families, Florida Department of Health, Florida Housing Finance Corporation, and the Florida Department of Economic Opportunity. Special interest groups and private citizens also participated in the process. Data and information came primarily from the U.S. Census Bureau, the American Community Survey, and the Shimberg Center for Affordable Housing Studies located at the University of Florida in Gainesville.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

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

- primarily benefit low- and moderate-income persons,
- prevent or eliminate substandard housing or blight, or
- meet other community development needs that have a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

In the Small Cities CDBG program, the highest priority projects identified are:

- job creation,
- flood and drainage (stormwater projects),
- street improvements,
- sewer line improvements, and
- water line improvements.

The highest priorities in the HOPWA program are:

- short-term rent, mortgage, and utility payments,
- short-term supported housing facility assistance,
- supportive services,
- housing placement assistance activities,
- tenant-based rental assistance (new priority beginning 2016), and
- grantee and project sponsor's administrative services.

For the HOME program, the highest priorities are:

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

The highest priorities for the NHTF program are:

- production of affordable rental housing units for extremely low income residents with a preference for persons with special needs, and persons who are homeless or are at-risk of homelessness.

The highest priorities for the ESG program are:

- outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individuals 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 independent living.

### **3. Evaluation of past performance**

According to the 2011-2015 State of Florida Consolidated Plan, Small Cities CDBG program projects that received a “high” or “moderate” need priority ranking were assigned a number of anticipated projects to be funded between 2011 and 2015. The following chart identifies the number of projects completed in 2013 as reported in the September 30, 2014, Consolidated Annual Performance and Evaluation Report (CAPER).

Anticipated projects not yet achieved from the 2011-2015 Consolidated Plan period include Community Center/Neighborhood Facilities, Public Facilities (not including ineligible projects), Street Improvements, and Commercial- Industrial Rehabilitation.

Though the 2011-2015 State of Florida Consolidated Plan did not document the anticipated number of homeless persons or families to be served over the five year planning period, the 2012 State of Florida CAPER did report that 1,355 households benefitted from homeless prevention services activities in 2011, and 1,916 households benefitted from homeless prevention services activities in 2012.

The 2012 State of Florida CAPER reported that the HOME program had expected to produce 450 rental units by 2015, in 2012 the HOME program reported 1,112 new rental units as the actual number accomplished by the end of 2011. That is 855 percent over the goal originally set in 2011. Also in 2011, the HOME program expected to produce 1,100 new homeownership housing units by 2015, in 2012 the HOME program reported 156 new homeownership housing units as the actual number accomplished by the end of 2011.

As NHTF is a new program being funded in 2016 for the first time, no previous performance has occurred to be evaluated.

The 2012 State of Florida CAPER reported that the HOPWA program had expected to provide tenant based rental assistance to 47 eligible HOPWA beneficiaries between 2011 and 2012, but actually provided tenant based rental assistance to 58 eligible HOPWA beneficiaries. Also in 2011, the HOPWA program expected to assist 56 eligible HOPWA beneficiaries through short-term transitional housing activities between 2011 and 2012, but only accomplished 37 eligible HOPWA beneficiaries. The HOPWA program, between 2011 and 2012, had expected to assist 2,046 eligible HOPWA beneficiaries through

short-term rent, mortgage or utility payments, but only accomplished 1,574. Finally, the HOPWA program had expected to provide permanent housing placement services for 281 eligible HOPWA beneficiaries, but only accomplished 198 eligible HOPWA beneficiaries.

<b>Community Development Needs</b>	<b>Need Priority</b>	<b>Anticipated Number of Projects to be Funded 2011-2015</b>	<b>Projects Completed Through 2013</b>
Community Centers/Neighborhood Facilities	Moderate	3	1
Parks and/or Recreation Facilities	Moderate	5	6
Other Public Facilities (Police and Fire Stations, Jail, Emergency Shelters, Treatment Plant, City Halls) Note: Some of the facilities identified as priority needs are not eligible under the CDBG Program.	Moderate	5	2
Flood & Drainage Improvements/Stormwater	High	10	14
Street Improvements/Road Paving	High	20	19
Sidewalks	Moderate		6
Sewer Line Improvements	High	20	29
Sewage Treatment Plant	Moderate	7	9
Sewer/Water Hookups	High	5	13
Water Line Improvements	High	20	28
Water Tank/Treatment/Wells	High	10	20
Commercial Industrial Rehabilitation	High	15	5
Commercial Industrial Infrastructure	Moderate	25	27

**Table 1 - Table 1: Priority CDBG Needs (2011-2015)**

#### **4. Summary of citizen participation process and consultation process**

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 team, before beginning the citizen participation process. The outreach plan included a database of more than 250 stakeholders from the local government land use planning contacts, private sector stakeholders, general public, non-profit organizations, grant program project sponsors, and social services providers statewide for information about current housing and community development needs.

The database was used to notify the contacts about the scheduled public meetings and the public hearing on May 18, 2015. The Consolidated Plan survey was also sent to the contacts on the database.

The Consolidated Plan survey for 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](http://www.surveymonkey.com) and posted on DEO's website from the beginning of the Consolidated Plan process, through the end of the thirty day comment period, ending 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 2015-2020 Consolidated Plan period.

The five public meetings were held in Tallahassee, Fort 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 Florida Administrative Register at least fifteen days prior to the beginning of the meeting dates. All meeting dates, location information, and handouts were e-mailed to the database contacts at least five days prior to the meetings taking place. Reminder e-mails were also sent to the contacts one day prior to the meetings taking place.

The public hearing on the Consolidated Plan was held on May 18, 2015, in Tallahassee, Florida. Advertisement of the public hearing was published in the Florida Administrative Register and on the DEO website at least fifteen (15) days prior to the public hearing. No one from the public attended. A copy of the 2015-2020 Consolidated Plan was posted on the DEO website on May 26, 2015, the start of the 30-day review period. The public comment period ended on June 25, 2015. A letter dated June 17, 2015, was received from Autism Speaks during the 30-day comment period. A copy of the letter is attached.

#### **Substantial Amendment for NHTF:**

When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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.

#### **5. Summary of public comments**

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

#### Substantial Amendment for NHTF:

Please refer to public comment and comment summary attachment.

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

All the comments received regarding housing and non-housing community priorities were considered in establishing the priority projects in the draft Consolidated Plan. Comments received allowing developers to use grant funds to finance gaps due to higher market costs, giving local governments in rural areas of economic concern a higher priority, issues regarding conflicts of interest, and opening the CDBG cycle at the same time each year are not considered in this Consolidated Plan because they do not relate to determining priority projects. These comments will be considered in future revisions to the CDBG program regulations and requirements.

The Consolidated Plan does not list specific physical and development disabilities individually but rather addresses the affordable housing and support services needs of persons with disabilities as a single population.

The letter from Autism Speaks identifies persons with autism as a special needs population that requires affordable housing assistance and support services. The letter recommends that persons with autism be identified in the Consolidated Plan.

All the comments received were considered in development of the proposed NHTF Allocation Plan.

## **7. Summary**

There continues to be a need for infrastructure projects in the communities that receive funding through the Small Cities CDBG program, financial assistance and support assistance to persons with AIDS to help with housing costs through the HOPWA program, new affordable housing and homebuyer assistance through the HOME program, and assistance to the homeless through the ESG program, including funding for the operation and maintenance of emergency shelters and transitional housing facilities, 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.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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
Lead Agency	FLORIDA	Department of Economic Opportunity
CDBG Administrator	FLORIDA	Department of Economic Opportunity
HOPWA Administrator	FLORIDA	Department of Health
HOME Administrator	FLORIDA	Florida Housing Finance Corporation
ESG Administrator	FLORIDA	Department of Children and Families
HOPWA-C Administrator		

**Table 2 – Responsible Agencies**

#### Narrative

NHTF Administrator- Florida- Florida Housing Finance Corporation

#### Consolidated Plan Public Contact Information

Craig Reynolds, DOH, HOPWA [craig\\_reynolds@flhealth.gov](mailto:craig_reynolds@flhealth.gov)

Nicole Gibson, Florida Housing Finance Corporation (HOME) [nicole.gibson@floridahousing.org](mailto:nicole.gibson@floridahousing.org)

Nicole Gibson, Florida Housing Finance Corporation (NHTF) [nicole.gibson@floridahousing.org](mailto:nicole.gibson@floridahousing.org)

Jennifer Baker, DCF, ESG, [jennifer.baker@myflfamilies.com](mailto:jennifer.baker@myflfamilies.com)

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## **PR-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 team, before beginning the citizen participation process. The outreach plan included a database of more than 250 stakeholders from the local government land use planning contacts, private sector stakeholders, general public, non-profit organizations, grant program project sponsors, and social services providers statewide for information about current housing and community development needs.

The database was used to notify the contacts about the scheduled public meetings and the public hearing on May 18, 2015. The Consolidated Plan survey was also sent to the contacts on the database.

The Consolidated Plan survey for 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](http://www.surveymonkey.com) and posted on DEO's website from the beginning of the Consolidated Plan process, through the end of the thirty day comment period, ending 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 2015-2020 Consolidated Plan period.

The five public meetings were held in Tallahassee, Fort 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 Florida Administrative Register at least fifteen days prior to the beginning of the meeting dates. All meeting dates, location information, and handouts were e-mailed to the database contacts at least five days prior to the meetings taking place. Reminder e-mails were also sent to the contacts one day prior to the meetings taking place.

The public hearing on the Consolidated Plan was held on May 18, 2015, in Tallahassee, Florida. Advertisement of the public hearing was published in the Florida Administrative Register and on the DEO website at least fifteen (15) days prior to the public hearing. No one from the public attended. A copy of the 2015-2020 Consolidated Plan was posted on the DEO website on May 26, 2015, the start of the 30-day review period. The public comment period ends on June 25, 2015.

**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 (91.215(l))**

The State 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.

Florida Housing Finance Corporation is working with its partner state agencies, the Departments of Children and Families, Elder Affairs, Veterans Affairs and the Agency for Health Care Administration to develop linkages between affordable rental housing and access to supportive services. One important pilot being worked on by these entities is the development of permanent supportive housing to serve chronically homeless persons with significant disabilities and frail elders who have significant needs and are high users of publicly funded emergency, healthcare, court services and institutional care. Out of this project will come a multi-year cost/benefit study evaluating the efficacy of permanent supportive housing to reduce public expenditures and improve personal outcomes for the residents.

As discussed below, the state’s Council on Homelessness provides important opportunities for agencies, stakeholders and housing providers to work together. In addition, Florida Housing Finance Corporation 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 State 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 on Homelessness (who represents the 28 Continuums) to address the needs of different homeless populations. In 2015, state funding in the amount of \$2,050,000 will be given 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 permanent housing grants to re-house our chronic, long-term homeless population.

The Department of Economic Opportunity and Florida Housing Finance Corporation sits on the state Council on Homelessness along with a number of other state agencies and stakeholders to discuss homeless housing and service issues. The Corporation 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 rehousing” approach

with short term tenant based rental assistance, and the use of forgivable state loans in rural areas working with Continuums of Care 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 Continuums' of Care 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 and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The DCF Office on Homelessness sent out the annual ESG survey to the Continuums of Care to gather input for allocation methods, performance standards, evaluation outcomes and HMIS compliance. The completed surveys were used to determine how the 2015 ESG funding would be dispersed throughout the state.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 3 – Agencies, groups, organizations who participated**

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

4	<b>Agency/Group/Organization</b>	Florida Department of Children and Families
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section PR-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**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Not applicable	
Local Comprehensive Plans	Department of Economic Opportunity	CDBG applications must include provisions from the local comprehensive plan demonstrating the proposed activity is consistent with comprehensive plan.

**Table 4 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))**

A discussion of the citizen participation process, including coordination with agencies, groups, organizations, and consultations is provided in the Executive Summary and section PR-15.

**Narrative (optional):**



**PR-15 Citizen 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**

Response exceeds number of allowable characters, please refer to Public Comment.

Substantial Amendment for NHTF:

When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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	Please refer to Public Comment attachment.	Please refer to Public Comment attachment.	Please refer to Public Comment attachments.	

**Table 5 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

This section of the Consolidated Plan will examine data and draw conclusions on housing needs and non-housing community development needs in Florida. The Needs Assessment along with the Market Analysis in the next section of the Consolidated Plan will be used to develop Strategies the Florida Department of Economic Opportunity (DEO), Florida Department of Health (DOH), Florida Department of Children and Families (DCF), and the Florida Housing Finance Corporation (FHFC), collectively referred to as the HUD-funded agencies, will use to help address local affordable housing, for every segment of the population, including all racial and ethnic groups and special needs populations such as persons with disabilities, and other community development priorities.

## NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

### Summary of Housing Needs

This section of the Consolidated Plan will examine the current status of Florida's housing market to determine what types of common housing problems may exist among all segments of the population (single persons, families, persons with special needs, etc.) in order to establish strategies that can be implemented through the state's HUD-funded programs. An examination of the available data was undertaken to determine the current status of Florida's housing stock considering incomplete facilities, cost burden, and overcrowding.

According to the data provided in this section, the most common housing problems affecting Florida households are substandard housing (lack complete plumbing, lack of a complete kitchen, lack of heat, or over the age of 50, or a combination of these), overcrowding, and cost burden. Of Florida's 7.1 million households, 28.3 percent are cost burdened (that is, they pay more than 30 percent of their income for housing), 1.9 percent of households live in substandard units, and 1.9 percent of households live in overcrowded conditions.

According to the University of Florida Bureau of Economic and Business Research Florida Statistical Abstract data, the total number of occupied housing units in Florida in 2013 was 7,610,153.

From the data presented, of the total occupied housing units in the State of Florida, the distribution of owner- and renter-occupied units within that total of 7,610,153 is 67.1 percent, or 5,106,413 homeowners and 32.9 percent, or 2,503,740 renters. A further analysis of the Occupancy Characteristics in the Florida Statistical Abstract data shows that the number of Family Households with the presence of children under the age of 18 years is 2,123,531, or 29.9 percent of total households. There is insufficient information available to determine the number of Family Households with children under 18 years of age in renter versus owner occupied housing or by percentage of AMI.

<b>Demographics</b>	<b>Base Year: 2000</b>	<b>Most Recent Year: 2011</b>	<b>% Change</b>
Population	15,982,378	18,688,787	17%
Households	6,341,121	7,140,096	13%
Median Income	\$38,819.00	\$47,827.00	23%

**Table 6 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

**Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households *	870,805	865,165	1,253,620	744,390	3,406,120
Small Family Households *	256,350	278,300	457,165	293,720	1,668,650
Large Family Households *	50,660	59,945	93,175	57,270	235,265
Household contains at least one person 62-74 years of age	167,155	188,920	276,400	164,515	761,645
Household contains at least one person age 75 or older	158,700	197,535	221,115	104,815	344,080
Households with one or more children 6 years old or younger *	133,095	134,495	186,645	106,065	340,050
* the highest income category for these family types is >80% HAMFI					

**Table 7 - Total Households Table**

Data 2007-2011 CHAS  
Source:

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	11,455	8,695	8,105	3,245	31,500	4,385	3,400	4,325	2,060	14,170
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	7,805	7,150	7,030	2,415	24,400	1,455	2,225	2,610	1,895	8,185
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	18,825	20,005	20,115	7,315	66,260	5,300	7,260	12,505	8,395	33,460

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 50% of income (and none of the above problems)	306,355	191,305	61,120	6,590	565,370	239,600	194,470	194,480	71,030	699,580
Housing cost burden greater than 30% of income (and none of the above problems)	33,425	116,960	244,340	73,190	467,915	50,275	116,380	203,275	145,935	515,865
Zero/negative Income (and none of the above problems)	50,735	0	0	0	50,735	51,770	0	0	0	51,770

**Table 8 – Housing Problems Table**

Data Source: 2007-2011 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	344,445	227,160	96,370	19,560	687,535	250,740	207,355	213,925	83,385	755,405
Having none of four housing problems	87,325	164,700	383,405	219,470	854,900	85,790	265,950	559,920	421,975	1,333,635
Household has negative income, but none of the other housing problems	50,735	0	0	0	50,735	51,770	0	0	0	51,770

**Table 9 – Housing Problems 2**

Data 2007-2011 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	140,115	147,075	140,760	427,950	72,030	93,470	167,090	332,590
Large Related	28,750	28,780	21,655	79,185	14,485	21,735	36,935	73,155
Elderly	76,395	61,270	42,215	179,880	151,115	155,930	132,055	439,100
Other	125,725	101,455	116,570	343,750	60,705	48,510	72,380	181,595

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	370,985	338,580	321,200	1,030,765	298,335	319,645	408,460	1,026,440

**Table 10 – Cost Burden > 30%**

Data 2007-2011 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	130,480	85,925	23,640	240,045	64,615	69,960	86,400	220,975
Large Related	25,895	13,990	3,345	43,230	12,700	15,740	16,405	44,845
Elderly	60,200	38,575	13,500	112,275	114,885	78,495	55,260	248,640
Other	117,570	66,175	23,600	207,345	54,355	35,465	40,275	130,095
Total need by income	334,145	204,665	64,085	602,895	246,555	199,660	198,340	644,555

**Table 21 – Cost Burden > 50%**

Data 2007-2011 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	23,160	22,380	21,425	6,965	73,930	5,095	7,220	11,035	7,005	30,355
Multiple, unrelated family households	2,930	4,070	4,795	1,825	13,620	1,580	2,280	4,280	3,355	11,495



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	1,180	1,275	1,765	1,200	5,420	150	90	100	50	390
Total need by income	27,270	27,725	27,985	9,990	92,970	6,825	9,590	15,415	10,410	42,240

**Table 32 – Crowding Information – 1/2**

Data 2007-2011 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 43 – Crowding Information – 2/2**

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

Data for the actual number of single person households and need for housing assistance of single person households is not available. To obtain the number of single person households, we used 2010 data from the U.S. Census Bureau indicating that the number of single person households in Florida is 2,021,781 out of a total number of households of 7,420,802, or 27.2 percent of the total households. Using this proportion, we estimated the number of single person households that are cost burdened.

The following observations are based on the cost burden information in Tables 10 and 11:

- greater than 30 percent owner and renter cost burdened households = 2,057,205
- greater than 50 percent owner and renter cost burdened households = 1,247,450

This plan assumes that the same proportion as above, 27.2 percent, of cost burdened households are single person households. The number of single person households that are cost burdened and therefore may be in need of assistance is as follows:

- greater than 30 percent cost burdened households that are single person households = 559,560
- greater than 50 percent cost burdened households that are single person households = 339,306

The total cost burdened households that are single person households equals 898,866, or 44 percent of the estimated single person households in Florida.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

According to the latest data available, provided by the 2005-2007 American Community Survey Public Use Microdata Sample (ACS PUMS) Data, there are approximately 5,205,790 persons with disabilities in Florida. There are 2,050,810 households with at least one member with a disability in Florida, making up 28.2 percent of Florida's total households. 475,810 of those households are at or below the poverty income line in Florida, or 28.2 percent of households with a member with a disability are living in poverty. The average number of persons residing in households with a member with a disability is two persons or 40.4 percent. Single Family homes are the typical type of housing that households with a member with a disability reside in with 1,269,250 households.

In 2013, the Florida Department of Law Enforcement's Uniform Crime Report reflected that 108,030 incidents of domestic violence were reported to law enforcement and 65,645 arrests were made for domestic violence offenses. During fiscal year 2013-2014, Florida's centers turned away 3,715 victims of domestic violence due to overcapacity. In the report prepared by the Florida Coalition Against Domestic Violence, "Domestic Violence Centers 2014-2015" report dated September 2014, Florida's 42 Domestic Violence Centers project a need for 175 emergency shelter and 265 transitional housing beds to provide services to an estimated 4,743 additional victims and their children. In addition, surveys of the Centers identified nearly \$34 million in capital needs to maintain, renovate, or repair some facilities and to replace or expand other facilities. According to a report from the Florida Coalition Against Domestic Violence, persons with a low socioeconomic status or making \$7,500 or less per year are twice as likely to become victims of sexual assault or exploitation. Although the report does not provide data on the number of sexual assault victims in Florida or the current status of housing programs to support victims of sexual assault, it does state that affordable housing programs such as public housing and Section 8 assisted housing can be beneficial to protect low socioeconomic status populations by providing clean and safe housing and supportive services to avoid becoming victims of sexual assault. The report also addresses the federal Violence Against Women Act (VAWA) that provides housing protections for domestic violence, dating violence, and stalking, but does not provide housing protection for sexual assault. Nationally between 22 and 57 percent of all homeless women report that domestic violence was the immediate cause of their homelessness. Additionally, 38 percent of all victims of domestic violence become homeless at some point in their lives. A victim of domestic violence will often leave an abuser multiple times before finally escaping the violence, therefore, experiencing multiple periods of homelessness.

## **What are the most common housing problems?**

The most common housing problem affecting Florida households is cost burden. According to the data provided, of Florida's 7.1 million households, 28.8 percent are cost burdened (that is, they pay more than 30 percent of their income for housing).

## **Are any populations/household types more affected than others by these problems?**

There are more cost burdened renter households than owner-occupied households. Of the renter households, small related families are shown to represent the largest portion of those that are cost burdened. In owner occupied households, the elderly represent the largest portion.

## **Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The needs and characteristics of low-income individuals and families with children vary; however, the main underlying issue lies within cost burden analysis. There are a number of ways to address cost burden, including reduced rent transitional housing, assistance with rent payment, developing individual financial planning assessments, assistance through support centers, and pathways to self-sufficiency through job training and placement services.

Under the rapid re-housing component of the Emergency Solutions Grant (ESG) Program in 2014, the Florida Department of Children and Families funded 28 agencies to serve 26 counties in Florida by providing rent and utility services to keep families in their current housing, and providing security deposits or utility deposits for new permanent housing. According to the 2015 ESG Annual Action Plan, there is \$2,500,000 budgeted for homeless prevention and rapid re-housing activities in the State of Florida for non-entitlement communities that do not receive direct allocations from HUD. At least 60 percent of awarded grant funding for rapid re-housing activities must serve homeless populations. However, the ESG program rapid re-housing activities are only provided for short terms or medium terms from up to three month or not to exceed 24 months. This may put former homeless households receiving this assistance at risk of becoming homeless again. The 2015 ESG Annual Action Plan does not include the number of households in Florida that are currently at risk of losing rapid re-housing assistance due to funding expiration.

## **If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The State of Florida defines at-risk groups as households containing persons with disabilities and low and very-low income households, also experiencing common housing problems such as a cost burden of 30 percent or greater or 50 percent or greater.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

The most specific housing characteristic that may cause instability and an increased risk of homelessness is cost burden. According to the data provided, more than 28 percent of Florida's households are cost burdened. If a household is spending more than 30 percent, and sometimes more than 50 percent, of their monthly income on housing costs, that means that less income remains to pay for other costs that must be sustained in order to live in a safe and decent environment. It may also mean that any unexpected extra expense such as a medical emergency could result in an inability to meet housing expenses and potentially result in homelessness. HUD's Continuum of Care networks throughout Florida are experiencing this problem with their homeless and at risk of homelessness populations.

**Discussion**

According to the data provided in the Housing Needs Summary Tables (Tables 8-13) above and the narratives in the Housing Needs Assessment Section, it can be concluded that common housing problems such as lack of complete facilities, overcrowding, and cost burden have an effect on all households types and income levels. In summary, however, it can be concluded that cost burden is shown to be the housing problem with the greatest negative affect on affordable housing.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

In this section of the Needs Assessment, a description of the need of any racial or ethnic group that has disproportionately greater need will be determined. According to 24 CFR 91.305, a disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

The tables in this section of the Consolidated Plan describe the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole. The discussion portion of this section of the Needs Assessment provides data on racial or ethnic groups, by income levels, that have a disproportionate greater need overcoming housing problems.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	639,142	93,287	87,329
White	326,217	50,953	53,269
Black / African American	149,221	20,415	17,219
Asian	10,247	1,175	2,372
American Indian, Alaska Native	1,908	360	261
Pacific Islander	228	30	45
Hispanic	143,588	19,535	13,257

**Table 54 - Disproportionally Greater Need 0 - 30% AMI**

Data 2007-2011 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Housing Problems- 0 to 30 Percent AMI

To determine the disproportionately greater need for the 0-30 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having one or more of four housing problems (lacks a complete kitchen, lacks complete plumbing, more than one person per room, cost burden greater than 30 percent), these households will be compared with the total number of households statewide having one or more of these housing problems. Information on the total number of statewide households with housing problem data is found in Table 14, along with the number of households by race that have housing problems.

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	631,211	211,294	0
White	337,676	155,431	0
Black / African American	118,441	26,540	0
Asian	10,041	1,851	0
American Indian, Alaska Native	1,486	523	0
Pacific Islander	254	19	0
Hispanic	156,023	24,689	0

**Table 65 - Disproportionally Greater Need 30 - 50% AMI**

Data 2007-2011 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Housing Problems- 30 to 50 Percent AMI

To determine the disproportionately greater need for the 30-50 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having one or more of four housing problems (lacks a complete kitchen, lacks complete plumbing, more than one person per room, cost burden greater than 30 percent), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 15 along with the number of households by race that have housing problems.

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	735,188	530,057	0
White	407,063	381,412	0
Black / African American	126,261	66,322	0
Asian	13,825	7,157	0
American Indian, Alaska Native	2,270	1,365	0
Pacific Islander	407	49	0
Hispanic	176,543	68,347	0

**Table 76 - Disproportionally Greater Need 50 - 80% AMI**

Data 2007-2011 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Housing Problems- 50 to 80 Percent AMI

To determine the disproportionately greater need for the 50-80 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having one or more of four housing problems (lacks a complete kitchen, lacks complete plumbing, more than one person per room, cost burden greater than 30 percent), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 16 along with the number of households by race that have housing problems.

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	315,262	451,835	0
White	188,479	316,863	0
Black / African American	42,207	59,161	0
Asian	6,943	7,051	0
American Indian, Alaska Native	758	1,544	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	129	120	0
Hispanic	72,273	62,358	0

**Table 87 - Disproportionally Greater Need 80 - 100% AMI**

Data 2007-2011 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Housing Problems- 80 to 100 Percent AMI

To determine the disproportionately greater need for the 80-100 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having one or more of four housing problems (lacks a complete kitchen, lacks complete plumbing, more than one person per room, cost burden greater than 30 percent), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 17 along with the number of households by race that have housing problems.

### Discussion

The first step in determining whether or not there is a disproportionate greater need for households with housing problems in each income level group, is defining whether or not a single segment of the racial and ethnic population is 10 percentage points or higher than the percentage of persons in a category as a whole. To calculate the percentage of housing problems experienced by each group, the number of households with a housing problem within the jurisdiction as a whole is divided by the total number of households within a specific group.

For the 0-30 percent AMI category of households experiencing one or more housing problems, White households make up the highest percentage of households with one or more housing problems with very low income at 51 percent of the total jurisdiction as a whole. The Black/African American race group make up for 23 percent of the total jurisdiction and Hispanics make up for 22 percent of the total jurisdiction as a whole.

For the 30-50 percent AMI category for households experiencing one or more housing problems, White households make up for the highest percentage of households with one or more housing problems with low income at 53 percent of the total jurisdiction as a whole. The Hispanic race group make up for 24



percent of the total jurisdiction and Black/African American race group make up for 18 percent of the total jurisdiction as a whole.

For the 50-80 percent AMI category for households experiencing one or more housing problems, White households make up for the highest percentage of households with one or more housing problems with moderate income at 55 percent of the total jurisdiction as a whole. The Hispanic race group make up for 24 percent of the total jurisdiction and Black/African American race group make up for 17 percent of the total jurisdiction as a whole.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

In this section of the Needs Assessment, the available data will be examined to determine the types of common housing problems faced by particular racial or ethnic segments of the population and the severity of each housing problem. A disproportionately greater needs exists if persons within a racial or ethnic group are 10 percentage points higher in any category than persons in a category as a whole.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	550,492	181,860	87,329
White	277,541	99,659	53,269
Black / African American	128,366	41,285	17,219
Asian	9,334	2,087	2,372
American Indian, Alaska Native	1,571	695	261
Pacific Islander	228	30	45
Hispanic	126,617	36,557	13,257

**Table 98 – Severe Housing Problems 0 - 30% AMI**

Data 2007-2011 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### Severe Housing Problems- 0 to 30 Percent AMI

To determine the disproportionately greater need for the 0-30 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having severe housing problems (lacks a complete kitchen, lacks complete plumbing and more than 1.5 persons per room or a cost burden greater than 50 percent or both), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 18 along with the number of households by race that have housing problems.

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	397,841	444,622	0
White	201,100	291,913	0
Black / African American	74,705	70,356	0
Asian	7,365	4,535	0
American Indian, Alaska Native	874	1,131	0
Pacific Islander	220	53	0
Hispanic	108,752	72,009	0

**Table 109 – Severe Housing Problems 30 - 50% AMI**

Data 2007-2011 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### Severe Housing Problems- 30 to 50 Percent AMI

To determine the disproportionately greater need for the 30-50 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having severe housing problems (lacks a complete kitchen, lacks complete plumbing and more than 1.5 persons per room or a cost burden greater than 50 percent or both), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 19 along with the number of households by race that have housing problems.

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	293,635	971,423	0
White	156,079	632,351	0
Black / African American	46,496	146,151	0
Asian	6,794	14,243	0
American Indian, Alaska Native	723	2,897	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Pacific Islander	154	298	0
Hispanic	80,002	164,927	0

**Table 20 – Severe Housing Problems 50 - 80% AMI**

Data 2007-2011 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### Severe Housing Problems- 50 to 80 Percent AMI

To determine the disproportionately greater need for the 50-80 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having severe housing problems (lacks a complete kitchen, lacks complete plumbing and more than 1.5 persons per room or a cost burden greater than 50 percent or both), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 20 along with the number of households by race that have housing problems.

### 80%-100% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	100,511	666,629	0
White	54,186	451,166	0
Black / African American	13,846	87,577	0
Asian	2,812	11,206	0
American Indian, Alaska Native	214	2,090	0
Pacific Islander	55	194	0
Hispanic	28,045	106,604	0

**Table 111 – Severe Housing Problems 80 - 100% AMI**

Data 2007-2011 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### **Severe Housing Problems- 80 to 100 Percent AMI**

To determine the disproportionately greater need for the 80-100 percent AMI population within the White, Black/African American, Asian, American Indian and Alaska Native, Pacific Islander, and Hispanic households having severe housing problems (lacks a complete kitchen, lacks complete plumbing and more than 1.5 persons per room or a cost burden greater than 50 percent or both), these households will be compared with the total number of households statewide having one or more of these housing problems. The statewide households with housing problem data is in Table 21 along with the number of households by race that have housing problems.

### **Discussion**

The first step in determining whether or not there is a disproportionate greater need for households with severe housing problems in each income level group, is defining whether or not a single segment of the racial and ethnic population is 10 percentage points or higher than the percentage of persons in a category compared to the jurisdiction as a whole. To calculate the percentage of housing problems experienced by each group, the number of households with a housing problem within the jurisdiction as a whole is divided by the total number of households within a specific group. The results shown below identify the percentages of households, by race group, that have a 10 percent or higher disproportionate greater need.

For the 0-30 percent AMI category for households experiencing one or more severe housing problems, White households make up for the highest percentage of households with one or more severe housing problems with very low income at 50 percent of the total jurisdiction as a whole. The Black/African American race group make up for 23 percent of the total jurisdiction and Hispanics make up for 23 percent of the total jurisdiction as a whole.

For the 30-50 percent AMI category for households experiencing one or more severe housing problems, White households make up for the highest percentage of households with one or more severe housing problems with low income at 50 percent of the total jurisdiction as a whole. The Hispanic race group make up for 27 percent of the total jurisdiction and Black/African American race group make up for 18 percent of the total jurisdiction as a whole.

For the 50-80 percent AMI category for households experiencing one or more severe housing problems, White households make up for the highest percentage of households with one or more severe housing problems with moderate income at 53 percent of the total jurisdiction as a whole. The Hispanic race group make up for 27 percent of the total jurisdiction and Black/African American race group make up for 15 percent of the total jurisdiction as a whole.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A household may be cost burdened when it spends more than 30 percent of its income for housing. A household may be severely cost burdened when housing costs are more than 50 percent of its income. Of those households with a potential cost burden, some choose, and are capable of affording, higher rents and mortgages, i.e., those with higher incomes have more flexibility and may be able to spend more than 30 percent of their income on housing, and still have enough left over for other expenses. However, households with lower incomes (generally those earning 80 percent or less of AMI are less capable of paying rent or mortgages above 30 percent of their income because they have less income remaining after housing costs for other basis needs.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	4,158,805	1,499,140	1,327,822	90,523
White	3,086,266	910,617	723,836	54,358
Black / African American	414,218	226,985	241,367	18,398
Asian	73,761	27,840	25,966	2,467
American Indian, Alaska Native	10,048	4,176	3,212	276
Pacific Islander	1,544	590	626	75
Hispanic	533,847	311,647	316,920	13,978

**Table 122 – Greater Need: Housing Cost Burdens AMI**

Data 2007-2011 CHAS  
Source:

### Discussion

The first step in determining whether or not there is a disproportionate greater need for households with housing cost burden in each income level group, is to define whether or not a single segment of the racial and ethnic population is 10 percentage points or higher than the percentage of persons in a particular category, compared to the jurisdiction as a whole. To calculate the percentage of housing problems experienced by each group, the number of households with a housing problem within the jurisdiction as a whole is divided by the total number of households within a specific group. The results shown below identify the percentages of households, by race group, that have a 10 percent or higher disproportionate greater need.

For the 0-30 percent AMI category for households experiencing potential cost burden, White households make up for the highest percentage of households with potential cost burden with very low income at 74 percent of the total jurisdiction as a whole. The Hispanics race group make up for 12 percent of the total jurisdiction as a whole and Black/African Americans account for 10 percent.

For the 30-50 percent AMI category for households experiencing potential cost burden, White households make up for the highest percentage of households with potential cost burden with low income at 60 percent of the total jurisdiction as a whole. The Hispanic race group make up for 20 percent of the total jurisdiction and Black/African American race group make up for 15 percent of the total jurisdiction as a whole.

For the 50 percent or more AMI category for households experiencing potential cost burden, White households make up for the highest percentage of cost burdened households with moderate income at 54 percent of the total jurisdiction as a whole. The Hispanic race group make up for 23 percent of the total jurisdiction and Black/African American race group make up for 18 percent of the total jurisdiction as a whole.

## **NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

According to 24 CFR 91.305, a disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

According to the data provided in Tables 14-21 above, the White race group had the highest disproportionate greater need across all income levels and types of housing problems. Persons in the Black/African American race group and Hispanic race group also showed disproportionate greater need across all income levels and housing problems, with the exception of the Black/African American race group for the 0-30 AMI level for cost burden.

### **If they have needs not identified above, what are those needs?**

No additional needs are identified other than those described in this plan.

### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The data and analysis in this section are based on statewide information. The HUD-funded agencies preparing this Consolidated Plan do not have readily available neighborhood information. This information is applicable to communities that receive funding directly from HUD.



## NA-35 Public Housing – (Optional)

### Introduction

There are 110 active Public Housing Agencies (PHAs) in Florida; 44 are located in non-entitlement areas. There are two general types of programs, as categorized by HUD: Public Housing Programs and Rental Assistance Programs, either through project based or tenant based assistance.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	103	3,376	31,852	94,636	1,038	90,050	2,016	897	231

**Table 133 - Public Housing by Program Type**

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

### Types of Vouchers and Certifications in Use in Florida

There are several public housing assistance programs available through the PHAs in Florida. The Section 8 Rental Certification program provide assistance to very low-income households. The family chooses the privately owned rental housing and the PHA pays the landlord the difference between the 30 percent of the household’s adjusted income and the unit’s rent. There are currently 103 Section 8 Rental Certificates in use in Florida.

The Moderate-Rehabilitation Program provides project-based rental assistance to low-income families occupying properties rehabilitated through a housing assistance payment contract between an owner and a PHA. The number of moderate-rehabilitation units in Florida are 3,376.

Project-based Section 8 housing programs are government based programs that provide rental housing to low-income households in privately owned and managed rental units. The subsidy stays with the building; when an occupant moves out, they no longer receives a benefit from the rental assistance.

There are 31,852 housing units in development operated by the PHAs in Florida.

The project-based voucher program allows a PHA to allocate up to 20 percent of its voucher assistance funds to specific housing developments in which the owner agrees to set aside a portion of the units to serve eligible tenants. There are 1,038 project-based voucher units in Florida.

Tenant-based vouchers are available to very low-income families to provide rental assistance. The family finds a rental unit and the PHA pays the owner the difference between 30 percent of the family's adjusted income and a PHA determined payment standard or the gross rent for the unit, whichever is lower. There are 90,050 tenant-based vouchers in use in Florida.

The Veterans Affairs Supportive Housing Program combines rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs. There are 2,016 of these special purpose vouchers in the state.

The Family Unification Program provides housing assistance for families that because of a lack of adequate housing have children that are in immediate placement in out-of-home care or will experience a delay in the discharge of children to the family from out-of-home care. The Family Unification Program can also assist youth between 18 and 21 years old who left foster care at age 16 or older and lack adequate housing. There are 897 of these vouchers.

Special purpose vouchers for persons with disabilities, including non-elderly disabled persons, mainstream 1-year, mainstream 5-year, and nursing home transition assistance. There have been 231 of these vouchers issued in Florida.

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	2	52	121	665	11	377	272	1
# of Elderly Program Participants (>62)	17	1,785	10,505	20,984	479	20,081	284	31
# of Disabled Families	84	639	5,841	21,887	104	20,352	1,051	136
# of Families requesting accessibility features	103	3,376	31,852	94,636	1,038	90,050	2,016	897
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 144 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	32	2,189	11,727	35,727	295	33,880	1,008	329	79
Black/African American	70	1,178	19,856	58,170	732	55,520	959	543	150
Asian	0	3	105	227	7	211	3	4	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	3	37	150	3	133	11	2	1
Pacific Islander	1	3	127	362	1	306	35	19	1
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 155 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	23	2,125	8,197	23,543	164	22,927	146	142	57
Not Hispanic	80	1,251	23,655	71,093	874	67,123	1,870	755	174

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 166 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

Not applicable- Neither the Small Cities CDBG, HOPWA, or ESG, provide funding to PHAs in Florida.

**What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

Not applicable- Neither the Small Cities CDBG, HOPWA, or ESG, provide funding to PHAs in Florida.

**How do these needs compare to the housing needs of the population at large**

Not applicable- Neither the Small Cities CDBG, HOPWA, or ESG, provide funding to PHAs in Florida.

**Discussion:**

According to Table 24 above, there are 121 formerly homeless families currently living in public housing and 665 formerly homeless families currently benefiting from Section 8 housing voucher programs (project-based or tenant-based) in Florida. According to the Shimberg Center for Housing Studies 2013 report, there were approximately 30,382 homeless families in Florida.

According to Table 24 above, there are 10,505 elderly participants (older than 62) currently living in public housing and 20,984 elderly participants (older than 62) currently receiving assistance from Section 8 housing voucher programs (project-based or tenant-based) in Florida. According to Table 3 of the Needs Assessment section, there are currently 714,545 households containing a person ages 62 or older with a total household income of 50 percent AMI in Florida. According to Table 19 above, there are 37,693 disabled families or families requesting accessibility features currently living in public housing and 116,523 disabled families or families requesting accessibility features currently benefitting from Section 8 housing voucher programs (project-based or tenant-based) in Florida. Neither the Small Cities CDBG, HOPWA, or ESG, provide funding to PHAs in Florida. However, the Florida Housing Finance Corporation, which administers the HOME program, contracts with some PHAs to administer short-term tenant-based rental assistance to households in need.

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

Florida state law defines “homelessness” to include: individuals, families, people who struggle with substance abuse and mental illness, youth who have aged out of foster care, runaway youth; and anyone who lacks a fixed, regular, and adequate nighttime residence, or whose primary residence is:

- sharing the housing of another person due to loss of housing, economic hardship, or a similar reason;
- living in a motel, hotel, travel trailer park, or campground due to lack of alternative, adequate accommodations;
- living in an emergency or transitional shelter;
- a primary night time residence that is a public or private place not designed for or ordinarily used for human beings;
- living in a car, park, public place, abandoned building, bus or train station, or similar setting;
- a migratory individual who qualifies as homeless because he or she is living in circumstances described above.

In contrast, under the Department of Housing and Urban Development's definition, a person is considered homeless if he or she is living on the street, in an emergency shelter, or in transitional housing. According to those point-in-time counts reported in Florida's 28 continuum of care plans, the total number of homeless persons in 2014 was 41,335 compared to 43,455 persons in 2013. The 2014 count shows a decrease of 2,120 homeless persons, a drop of 4.87 percent statewide.

According to Part 1 –Point in Time (PIT) Estimates of Homelessness, 2014 Annual Homeless Assessment Report (AHAR) to Congress, homelessness declined by 6,527 persons between 2007 and 2014. In 2014, 52.2 percent or 21,691 individuals were unsheltered. Some small counties and units of local governments reported that 95 percent of their homeless populations were unsheltered. Ft. Pierce/St. Lucie County, Indian River County, and Martin County Continuums of Care reported that 95 percent (1,360 homeless persons) of their homeless population was unsheltered. On a single night in January 2014, Florida reported 28,730 unsheltered homeless individuals. Of the unsheltered individuals, 5,847 were in families. For the time period 2013-2014, there were 3,691 more homeless families than reported in 2012. On a single night in January 2014, Florida reported 1,230 unsheltered unaccompanied children and youth. For the time period 2013-2014, Florida reported 935 unsheltered chronically homeless individuals. HUD’s definition of chronic homelessness includes an individual or family with a disabling condition who has been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years (<https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/>).

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	543	136	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	3,092	918	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 177 - Homeless Needs Assessment**

**Data Source Comments:** 2014 Point in Time Counts, Florida Council on Homelessness Report

Indicate if the homeless population is: Partially Rural Homeless

## Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	543	136	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	3,092	918	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 188 - Homeless Needs Assessment**

**Data Source Comments:** 2014 Point in Time Counts, Florida Council on Homelessness Report

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**



According to the Florida Department of Health, There are 30 counties in Florida considered to be rural out of the total 67 counties. The 2014 Florida Council on Homelessness Annual Report indicated that 2014 PIT counts were conducted in the following rural counties: DeSoto, Glades, Gulf, Hamilton, Hardee, Hendry, Highlands, Jackson, Lafayette, Monroe, Nassau, Okeechobee, Putnam, Sumter, Suwannee, and Walton/Okaloosa. The rural county with the highest homeless population reported was Walton (which is combined with Okaloosa County) at 904 persons. The second highest homeless population was in Monroe with 678 persons. According to the report, these numbers are a combination of unsheltered and emergency sheltered homeless persons. The report also does not identify the homeless data by population characteristics, which provides difficulties with completing the Rural Homeless Needs Assessment table.

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Chronically homeless individuals and families

According to Part 1 - Point in Time Estimates of Homelessness, 2014 Annual Homelessness Assessment (AHAR) to Congress, there were approximately 935 chronically homeless individuals in Florida between 2013 and 2014.

Families with children

According to Part 1 - Point in Time Estimates of Homelessness, 2014 Annual Homelessness Assessment (AHAR) to Congress, there were approximately 5,847 homeless families with children in Florida between 2013 and 2014. There were 3,691 less than reported in 2012.

Veterans and their families

According to the Florida Council on Homeless Annual Report, there were 3,974 homeless veterans reported in the 2014 point in time counts. The statistics do not provide the count of veterans that were in families.

Unaccompanied youth

According to Part 1 - Point in Time Estimates of Homelessness, 2014 Annual Homelessness Assessment (AHAR) to Congress, there were 1,230 unaccompanied homeless children or youth.



**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	17,611	0
Black or African American	10,957	0
Asian	116	0
American Indian or Alaska Native	339	0
Pacific Islander	95	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

2014 Point in Time Counts, Florida Council on Homelessness Report

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

There were an estimated 12,812 homeless families with children and an estimated 4,552 homeless veterans in Florida. There is no data available that estimates the number of homeless families with veterans in Florida. Both of these types of homeless families are in need of and are eligible for housing assistance when and if available in their communities. The need for education about programs available to these families, as well as job access and training, as well as supportive housing and services, are factors in families not currently receiving the assistance that is available. The most common issue is the lack of funding available in communities reporting homeless people.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

According to the 2014 Point-in-Time Survey for Florida, White persons make up the highest number of homeless in Florida with an estimated 17,611 followed by Black or African-Americans with 10,957. Pacific islanders have the least number of homeless in Florida with an estimated 95 persons. According to the 2014 Florida Department of Children and Families, Council on Homelessness Report, 3,384 homeless persons out of 32,181 responding to the survey, indicated that they were either Hispanic or Latino. At 10.5 percent of the homeless population, this is down from the 2013 level of 12.1 percent.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

According to data presented, the category with the highest total number of homeless is persons in households with only adults (an estimated 26,990 households). There are currently 12,044 unsheltered households in this category and 14,946 sheltered households in the category. The category with the

lowest total number of homeless is persons with HIV with a reported 246 unsheltered persons and 373 sheltered persons in this category. There are several factors that may contribute to homelessness for these types of households, including mental health and substance abuse problems, other disabilities, home foreclosure, lack of access to affordable housing and supportive services, lack of access to jobs and job training, and lack of housing assistance funding.

**Discussion:**

As mentioned in the Introduction, there were 28,730 unsheltered individuals and 1,230 unaccompanied children and youth counted as homeless in Florida on a single night in January 2014, for a total of at least 29,960 unsheltered homeless individuals in Florida at that time. In 2014, it was reported that there were a total of 41,335 homeless individuals in Florida. Based on these statistics, it can be assumed that roughly 11,375 homeless individuals are sheltered on any given night and who currently experience homelessness. Information is not available for persons who lose their housing due to foreclosure, eviction, or other circumstances and enter the homeless population. In addition, in some cases people who lose their homes are able to stay with relatives or friends, which make it difficult for state agencies and local continuum of care agencies to obtain accurate information about persons entering and exiting homelessness each year.

Regarding the nature and extent of homelessness by racial and ethnic groups, the 2014 Florida Council on Homelessness Annual Report states that there were approximately 17,611 White homeless individuals, 10,957 Black/African American homeless individuals, 339 American Indian/Alaskan homeless individuals, 116 Asian homeless individuals, and 95 Hawaiian/Pacific Islander homeless individuals. These statistics show that White and Black/African American homeless individuals represent a higher population than any of the other races with 54.3 percent and 34 percent.

## NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

### Introduction

The University of Florida's Shimberg Center for Housing Studies provides data for special needs populations such as farmworkers and persons with disabilities. Frail, elderly persons are considered a special needs population in Florida, and the latest statistics from this category will be compiled from the Florida Department of Elder Affairs. Because the Florida HOPWA Program provides housing opportunities for persons with HIV/AIDS, persons with HIV/AIDS will be included in the Non-Homeless Special Needs Assessment section of this Consolidated Plan. This section addresses the characteristics of each of the three identified non-homeless special needs populations.

### HOPWA

<b>Current HOPWA formula use:</b>	
Cumulative cases of AIDS reported	0
Area incidence of AIDS	0
Rate per population	0
Number of new cases prior year (3 years of data)	0
Rate per population (3 years of data)	0
<b>Current HIV surveillance data:</b>	
Number of Persons living with HIV (PLWH)	0
Area Prevalence (PLWH per population)	0
Number of new HIV cases reported last year	0

**Table 199 – HOPWA Data**

Data Source Comments:

### HIV Housing Need (HOPWA Grantees Only)

<b>Type of HOPWA Assistance</b>	<b>Estimates of Unmet Need</b>
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

**Table 30 – HIV Housing Need**

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

## **Describe the characteristics of special needs populations in your community:**

### Farmworkers

According to the latest data available from the Shimberg Center for Housing Studies Special Needs Housing Data Report in 2013, there were an estimated 91,423 migrant farmworker households in Florida. Of these, 58,225 were unaccompanied, which means traveling without family members or as individuals, and 33,198 were accompanied, which means traveling with their families including children.

### Persons with Disabilities

Persons with Disabilities means a person who is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:

- is expected to be of long-continued and indefinite duration;
- substantially impedes his or her ability to live independently; and
- is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- has a developmental disability as defined in 42 U.S.C. 6001.

There are over 2.5 million persons with disabilities over the age of 16 in Florida. Of the total 2,251,979 households that contain at least one person with a disability, 1,464,210 are homeowners and 787,769 are renters. According to the Florida Disability Population Statistics, gathered from ACS PUMS Data for the time period 2010-2015, the unemployment rate of persons with disabilities in the labor force is 5.4 percent or 71,500 persons, compared to the total current state unemployment rate of 8.8 percent or 515,000.

### Elderly and Frail Elderly

Florida is the third most populous state, with over 19.8 million citizens counted in the 2014 Census Quickfacts. With an estimated 3.7 million persons age 65 and older, Florida ranks first in the percentage of citizens who are seniors. The national percentage of the 65 and older population is 14.1 percent, while comparatively, Florida's 65 and older population is up to 18.7 percent and growing.

## **What are the housing and supportive service needs of these populations and how are these needs determined?**

### Farmworkers

According to the Farm Labor Trends and Multifamily Housing Demand in Florida, November 2014 Report, the average farmworker household income ranges between \$10,000 and \$30,000 per year. Types of affordable housing units available to farmworkers include market-rate rental units, assisted-

housing developments financed by the Florida Housing Finance Corporation and USDA Rural Development, and migrant labor camps. There are 79 assisted housing developments and 461 labor camps resulting in 21,125 single person beds. Many properties targeted to farmworkers through state and federal programs have had problems maintaining occupancies, and many assisted properties (10 from FHFC and 19 from USDA) have requested and received federal and/or state waivers to serve the general population.

A 2014 update report prepared by the Shimberg Center for the Florida Housing Finance Corporation showed that the number of farmworkers in Florida is declining.

#### Persons with Disabilities

According to the 2015 Disability Rights Florida Report, any Floridian with a disability issue is eligible to receive Disability Rights Florida services. Some examples of supportive services available to the persons with disabilities population include information and referrals, self-advocacy and support, technical assistance, investigations into complaints of abuse, neglect and rights violations, dispute resolution support, negotiation and mediation support, and other advocacy services. Some supportive services needs not provided to persons with disabilities under this program include criminal law representation, family law representation, financial assistance for utility allowances and housing allowances, landlord/tenant disputes, and social security disability determination. There is a large population of homeless persons or at-risk of homelessness for persons with HIV/AIDS due to high health care costs.

#### Elderly and Frail Elderly

The Florida Department of Elder Affairs offers a variety of supportive services including case management, caregiver support and nutrition programs for persons 65 years of age and older. Through the Older American's Act (OAA), Florida can use allocated funding from the OAA to provide things such as adult day care and in home care for persons in need of caregiver services. The Community Care for the Elderly (CCE) federal funding program allocated money to Florida for services such as counseling, home repair, emergency alert responses, and in home nursing. The Home Care for the Elderly (HCE) program provides a subsidy to in home caregivers of persons 65 years or older for food, housing, clothing and medical care.

#### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Florida continues to rank third in the nation in the cumulative number of AIDS cases (126,581 in 2012) and second in the nation in the cumulative number of HIV cases (49,058 in 2012). The Florida Department of Health estimates that approximately 130,000 individuals are living with HIV disease in Florida. Of those persons living with HIV disease, 49 percent are Black, 29 percent are White and 20 percent are Hispanic. Men represent 70 percent of the cases. Persons over the age of 45 years represent 60 percent.

**Discussion:**

In conclusion, the housing and supportive services needs of Florida's special needs population are being addressed through a variety of programs and initiatives administered by state departments and agencies, in partnership with local non-profit and service providers, but as the population grows the need may increase at a more rapid rate than the available funding for the programs.



## **NA-50 Non-Housing Community Development Needs - 91.315 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

The 2011-2015 Consolidated Plan identified youth centers, senior centers, parks and recreation facilities, police/fire stations, and emergency shelters as priority projects for non-housing community development funding. Though identified as priorities, none of these types of public facilities received a ranking higher than a "moderate" priority according to public input. According to public input received during the citizen participation process for the 2015-2020 Consolidated Plan, very little change in priority was identified. Based on public comments received, and documented in this plan, the priority for these types of public facilities listed above had changed from a "moderate" priority ranking to a "low" priority ranking.

### **How were these needs determined?**

The need for public facilities in funding cycles between FY 2015 and FY 2020, all comments received during the citizen participation process and from responses to surveys sent to local governments. The amount of funding allocated to each of these categories in the single year Action Plans, will be determined using these same evaluation methods.

### **Describe the jurisdiction's need for Public Improvements:**

The 2011-2015 Consolidated Plan identified flood and drainage improvements, street improvements/paving, sewer line improvements, sewer and water hookups, and water Line improvements had the highest priorities for non-housing community development funding. According to public input received during the citizen participation process, these infrastructure improvements remain as community priority needs throughout Florida. Ninety percent of survey respondents identified these categories of public improvements to be a "high" priority and an ongoing unmet need in their community. Most of the survey respondents identified sewer and water hookups as the highest priority for their community. All of the survey respondents were from municipalities located in the North and Central Regions of Florida, which typically have a population of less than 50,000 persons.

### **How were these needs determined?**

In order to determine the need for Public Improvements in funding cycles between FY 2015 and FY 2020, all comments received during the citizen participation process were reviewed, as well as responses to the Consolidated Plan surveys that were received. The amount of funding allocated to each of these categories in the single year Action Plans, will be determined using these same evaluation methods. The Small Cities CDBG Program will receive approximately \$24 million in funding per year between FY 2015 and FY 2020 for all eligible categories, and it is expected that more applications will be received for Public Improvement funding, than funding available for these activities.

## **Describe the jurisdiction's need for Public Services:**

Public Services is always a priority for communities in Florida. Although there are several HUD funded programs that provide funding for Public Services activities, restrictions, such as the 15 percent federal cap for the CDBG program, hinder smaller communities from achieving solutions to common problems such as mental health counseling, decent healthcare, and supportive services for victims of abuse, neglect and domestic violence. According to public input received during the citizen participation process, youth services programs and mental health supportive services were the two highest priority ranking categories within the Public Services category. Though the need for construction or rehabilitation of Youth Centers received a "moderate" or "low" priority, according to public input collected in the form of comments and survey responses, the need for day to day operations for existing Youth Services programs or the expansion of Youth Service programs is a high priority.

## **How were these needs determined?**

In order to determine the need for Public Services in funding cycles between FY 2015 and FY 2020, all comments received during the citizen participation process were reviewed, as well as responses received from the Consolidated Plan surveys. A new ranking system was developed based on the information evaluated. The amount of funding allocated to each of these categories in the single year Action Plans, will be determined using these same evaluation methods.

While public services are an eligible activity, the statutes authorizing the Florida CDBG program limits the use of these funds to neighborhood revitalization, commercial revitalization, housing rehabilitation, and economic development activities. The demand for infrastructure funding for neighborhood revitalization consistently exceeds the funding available.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The purpose of this section of the Consolidated Plan is to describe the current state of Florida's housing market by providing current quantitative data to determine the number and condition of the current housing stock and draw conclusions on how to allocate federal funding appropriately to meet the need for affordable housing in the future. First, the status of the housing market will be determined by examining the amount of existing housing units, housing costs, and conditions of the general and public and assisted housing stock for all segments of the population including homeless persons and families, and persons with special needs. Next, quantitative data will be compared with the current need for affordable housing. Lastly, conclusions derived from the data and analysis will be used to establish strategies to meet affordable housing needs in Florida.

## MA-10 Number of Housing Units – 91.310(a)

### Introduction

This section of the Market Analysis discusses the latest housing data, gathered from a wide range of resources, illustrating the number and types of housing units available to meet the current housing needs of Florida’s residents. The narratives in the section describe the target population and income levels of federally funded programs and the types of housing units needed to achieve an adequate housing supply for all classes of families and individuals.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	4,848,083	54%
1-unit, attached structure	556,025	6%
2-4 units	541,287	6%
5-19 units	979,622	11%
20 or more units	1,157,578	13%
Mobile Home, boat, RV, van, etc	862,040	10%
<b>Total</b>	<b>8,944,635</b>	<b>100%</b>

**Table 201 – Residential Properties by Unit Number**

Data Source: 2007-2011 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	15,684	0%	74,120	3%
1 bedroom	180,342	4%	519,464	23%
2 bedrooms	1,301,493	26%	913,841	41%
3 or more bedrooms	3,430,989	70%	704,163	32%
<b>Total</b>	<b>4,928,508</b>	<b>100%</b>	<b>2,211,588</b>	<b>99%</b>

**Table 212 – Unit Size by Tenure**

Data Source: 2007-2011 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

All HUD funded programs, including CDBG, HOME, ESG, and HOPWA, target moderate, low, and very low-income families and individuals (including families with children, elderly, and persons with disabilities) that have households incomes equal to or less than 80 percent of the AMI. The CDBG grant program, and similar programs such as Neighborhood Stabilization Program (1 and 3) and CDBG Disaster

Recovery (CDBG-DR), must spend at least 25 percent of grant funds on very low-income families and individuals with household incomes of equal to or less than 50 percent of the AMI.

By the end of 2014, more than 181,000 affordable rental units were found in Florida Housing Finance Corporation's portfolio, with most of these required to serve households at or below 60 percent AMI. These units are part of the 262,637 assisted rental units and 35,987 public housing units in Florida (Shimberg Center, 2014 Assisted Housing Inventory). Of these units, 226,195 are designated for families, 84,019 are designated for elderly persons, 7,290 are designated for farmworkers, 1,839 are designated for homeless families, and 2,559 are designated for persons with disabilities.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

According to the 2010-2015 Consolidated Plan, there was an anticipated loss of approximately 1,457 rental assisted housing units in non-entitlement communities due to expiration of Section 8 funding contracts and/or funding programs. Of the 1,457 rental assisted housing units anticipated to be lost by 2015, 1,318 rental assisted housing units funded through HUD Rental Assistance Programs, 161 rental assisted housing units funded through the Section 515 program, and 269 rental assisted housing units funded through the Section 202 program will be lost due to program expirations. Some of these anticipated losses are duplicated due to blended funding provided from one or more of the programs mentioned. According to the Shimberg Center 2012 Lost Properties Inventory (most recent data available), over many years 12,445 rental assisted housing units have been lost.

The Shimberg Center has estimated that a further 43,200 units have a medium to high risk of being lost by 2020, based on the age of the developments, the source of their subsidies, and the dates when the subsidies will expire.

**Does the availability of housing units meet the needs of the population?**

As described earlier in this housing assessment, of Florida's 7.1 million households, 28.8 percent are estimated to be cost burdened (that is, they pay more than 30 percent of their income for housing, with some paying more than half of the income for housing). These housing statistics illustrate that the housing units available may not meet the needs of the low-income owner and renter population in Florida. Furthermore, according to 2014 data, the most recent information from the Office of Economic and Demographics, it is projected that Florida's population is anticipated to grow by an estimated 1,402,464 persons between 2015 and 2020. If this population projection is correct, this means that the current housing stock may not be sufficient to meet the need for affordable housing for all income levels and family types before the end of this Consolidated Plan period.

### **Describe the need for specific types of housing:**

During the public meeting process, there were several comments received regarding the need for affordable multifamily rental housing developments. According to program administrators in the Northeast and Central Florida regions, the competitive nature of the State tax credit program and the lack of funding for rental assisted projects may discourage private sector developers from developing multifamily rental housing developments. Due to the high foreclosure rates between 2008 and 2013, moderate to middle income homeowners who abandoned their homes are in some cases now living in rental units in mixed income developments that leave them unavailable to be occupied by low and very-low income families and individuals.

### **Discussion**

Based on the information in Section NA-10 of Housing Needs Assessment portion of this Consolidated Plan, there is a need for affordable housing due to the inherent cost burden of 30 percent or greater that affects 28.8 percent of Florida households,. Though current data displayed in Table 31 above shows a total of 8,944,635 housing units in Florida by type, it is important to factor in other housing conditions such as substandard housing, high costs of housing, and household income level to determine if current market trends are addressing the unmet need. Other factors such as foreclosure rates, availability of handicap accessible units, potential loss of existing affordable housing through the expiration of rental assistance contracts may affect the market trends and should be considered when developing strategies to address unmet need through the HUD-funded agencies and programs.

## MA-15 Cost of Housing – 91.310(a)

### Introduction

In this section of the Market Analysis, Florida's current housing market prices, rental and ownership, with median income data is analyzed to determine whether there is sufficient affordable housing for all family types and income levels. Data provided by HUD will be utilized along with comparative data from other sources to describe the current status of housing costs, determine the need for affordable housing options, and draw conclusions on how federal funding programs can be used appropriately to meet those needs.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	93,200	188,600	102%
Median Contract Rent	551	825	50%

**Table 223 – Cost of Housing**

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	391,316	17.7%
\$500-999	1,179,152	53.3%
\$1,000-1,499	469,651	21.2%
\$1,500-1,999	111,761	5.1%
\$2,000 or more	59,708	2.7%
<b>Total</b>	<b>2,211,588</b>	<b>100.0%</b>

**Table 234 - Rent Paid**

Data Source: 2007-2011 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	111,790	No Data
50% HAMFI	335,095	369,220
80% HAMFI	1,247,125	1,022,160
100% HAMFI	No Data	1,605,780
<b>Total</b>	<b>1,694,010</b>	<b>2,997,160</b>

**Table 245 – Housing Affordability**

Data Source: 2007-2011 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

**Table 256 – Monthly Rent**

Data Source Comments:

### Is there sufficient housing for households at all income levels?

According to the Shimberg Center 2015 housing demographics data, 3,355,700 households in Florida have a household income of less than 80 percent AMI out of the estimated 9,047,612 total households within the state. The same study completed in 2013 reported that 3,296,744 households in Florida had a potential cost burden of 30 percent or more and 1,662,452 of the total households had from a potential cost burden of 50 percent or more. That means that 43 percent of households had a potential cost burden of 30 percent or more and 22 percent of households had a potential cost burden of 50 percent or more. This study did not differentiate between owner-occupied households and renter households, but a similar study conducted by the Shimberg Center in 2013 reported that 2,924,626 owners with mortgage costs had a potential cost burden of 30 percent or more and 1,380,738 renter households had a potential cost burden of 30 percent or more. Of those households with a cost burden, some choose, and are capable of affording, higher rents and mortgages, i.e., those with higher incomes have more flexibility and may be able to spend more than 30 percent of their income on housing and still have enough left over for other expenses. Households with lower incomes (generally those earning 80 percent or less of the AMI) are less capable of paying rents or mortgages above 30 percent of their income because they have less income remaining after housing costs for other basic needs.

With over 3 million households in Florida with a potential cost burden of 30 percent or more, there may be insufficient affordable housing for all income levels.

### How is affordability of housing likely to change considering changes to home values and/or rents?

In 2014, according to the Shimberg Center for Housing Studies, the median sales price for a home in Florida was \$185,000 and the median gross rent is \$1,100 per month (family of four). This can be compared to the median sales price for a home in Florida of \$159,000 and a median gross rent of \$987 per month (family of four) in 2010. The median household income in Florida in 2014, according to HUD was \$56,100. The household median income in Florida in 2010 was \$59,400. With the increases in home sales prices and median gross rents and a decrease in household incomes between 2010 and 2014, there may be less affordable housing.



## **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

In a side by side comparison, HOME rents/Fair Market rents and area median rents are not very different for a family of four. The average Fair Market rent for 2014 in counties considered metropolitan statistical areas is about \$1,150 for a three bedroom home and the statewide median rent for a three bedroom home in 2014 is about \$1,200 per month. However, if comparing the current monthly rental payments with the median income of \$56,100, a family of four must have a monthly gross income of over \$4,000 per month in order to not be considered potentially cost burdened.

This current trend means that other factors such as family households versus single person households, employment rates, and available affordable housing stock in counties be taken into account to calculate a sufficient number of affordable housing units to produce or preserve during this Consolidated Plan period.

### **Discussion**

Information presented in the Housing Needs Assessment portion of this Consolidated Plan determined there are an estimated 1,633,660 owner-occupied households and 1,670,995 renter households with incomes at or below 80 percent AMI estimated to be potentially cost burdened . In this section, the data shows that the cost of homeownership and rents are increasing and household income may not be rising at the same rate. Therefore, the demand for affordable housing may be increasing.

## MA-20 Condition of Housing – 91.310(a)

### Introduction:

This section of the Consolidated Plan will examine the current condition of Florida's housing units and based on the conclusions, implementation strategies will be implemented to increase the affordable housing stock. First, data provided by HUD will be utilized with comparative data from other sources to describe the current condition of Florida's housing inventory. Next, based on any deficiencies that are identified, strategies to address these housing deficiencies will be described that can be implemented by the state agencies with HUD-funded programs to help eliminate substandard conditions and provide safe and affordable housing units for the residents of Florida.

### Definitions

The definition of substandard condition that will be used in this Consolidated Plan is any housing unit with the lack of complete plumbing, lack of a complete kitchen, lack of heat, or over the age of 50, or a combination of these conditions. Furthermore, the Shimberg Center for Housing Studies, 2013 General Unit Characteristics Inventory Report, defines substandard condition but suitable for rehabilitation as units that lack complete plumbing, lacks a complete kitchen, no heat, over the age of 50, but only containing one or two of the listed housing problems and located in an area of a community considered affordable and with full access to the public services necessary to create a safe and accessible living environment.

Statewide data for vacant housing units and REO (real estate owned) properties suitable for rehabilitation and not suitable for rehabilitation are not available.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,792,106	36%	1,150,058	52%
With two selected Conditions	39,810	1%	78,904	4%
With three selected Conditions	3,996	0%	8,411	0%
With four selected Conditions	173	0%	349	0%
No selected Conditions	3,092,423	63%	973,866	44%
<b>Total</b>	<b>4,928,508</b>	<b>100%</b>	<b>2,211,588</b>	<b>100%</b>

Table 267 - Condition of Units

Data Source: 2007-2011 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	962,307	20%	402,101	18%
1980-1999	2,022,349	41%	799,542	36%
1950-1979	1,745,709	35%	872,103	39%
Before 1950	198,143	4%	137,842	6%
<b>Total</b>	<b>4,928,508</b>	<b>100%</b>	<b>2,211,588</b>	<b>99%</b>

**Table 278 – Year Unit Built**

Data Source: 2007-2011 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,943,85		1,009,94	
	2	39%	5	46%
Housing Units build before 1980 with children present	375,115	8%	243,310	11%

**Table 289 – Risk of Lead-Based Paint**

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 40 - Vacant Units**

Data Source: 2005-2009 CHAS

## Need for Owner and Rental Rehabilitation

According to the data provided by HUD, 1,792,106 owner-occupied housing units in Florida reported having at least one housing condition and 1,150,058 rental housing units reported having at least one housing condition. Housing conditions can be the lack of complete plumbing, lack a complete kitchen, lack of heat, or over the age of 50, or a combination of these conditions. Because these housing units only reported one housing condition, they are considered suitable for rehabilitation according to the State's definition of "substandard housing condition, but suitable for rehabilitation." This makes for a total of 2,942,164 housing units suitable for rehabilitation throughout Florida. Each of these housing units would be inspected and determined feasible for rehabilitation on a case by case basis. Other

factors, such as extent of condition, funding available within the community, and local land use regulations would be taken into consideration to determine if rehabilitation is the best strategy to eliminate the housing problem or condition.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

According to the data provided by HUD, 1,943,852 owner-occupied housing units and 1,009,945 housing units were built prior to 1980. Any house built prior to 1980 is at risk for containing lead based paint. Of the total owner occupied housing units built before 1980, only 8 percent of housing units had children present and 11 percent of rental units have children present. The risk of a lead based paint hazard occurring increases when a child is present because children are more likely to ingest the lead components if the paint chips or flakes. Programs such as HOME and CDBG require lead based paint testing for all housing units, built prior to January 1, 1978, as established by 24 CFR 35.115, to determine whether or not rehabilitation is feasible. No federal funds will be allocated toward rehabilitation of a housing unit until lead based paint testing is completed and results are concluded.

### **Discussion:**

Nearly 3 million homes (a total of owner-occupied and rental units) may be candidates for renovation of some sort. State and local governments will likely need funding to renovate or rehabilitate these housing units to ensure they provide a safe, sanitary, and decent living environment for residents. In addition, there are 3.0 million housing units built before 1980. Rehabilitating these homes and rental units may incur additional costs to remove and safely dispose of lead based paint.

## MA-25 Public and Assisted Housing – (Optional)

### Introduction:

Public housing needs are determined by the number of persons living in poverty. Substandard housing conditions also relate to the number of units needed. Substandard housing conditions include lack of plumbing, lack of a complete kitchen, no heat, over the age of 50, or a combination of these conditions. For this section, other key indicators such as cost burden and overcrowding are examined. To provide consistency in data for statewide public housing needs, substandard housing data is collected from annual surveys, reports and Public Housing Agency (PHA) plan amendments.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	95	3,365	35,207	100,889	717	44,531	13,503	8,921	10,553
# of accessible units			11						
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 291 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

According to the 2010 U.S. Census and Public Housing Agency reports, Florida's public housing agencies are faced with high numbers of substandard units. An estimated 296,643 public renter households were considered substandard. Renter households have incomes that are extremely-low, low or moderate when compared to the AMI, which includes all renter households with incomes that are less than or equal to 80 percent of the AMI. Data on elderly renter households in substandard units is not available. Substandard housing characteristics are determined by incomplete or below standard facilities (i.e., unit does not meet building code or housing quality standards), age of unit, and overcrowding due to household size.

**Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:**

According to information provided by the Shimberg Center for Housing Studies Public Housing Inventory Report for 2013, there were 91,057 substandard public or assisted housing units with occupants with an income less than 30 percent AMI. There were 83,150 public or assisted substandard housing units with occupants with an income between 30 percent and 49 percent AMI. There were 122,436 public or assisted substandard housing units with occupants with an income between 50 percent and 80 percent AMI.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

Public housing agencies throughout the state provide incentive programs and tools necessary for families residing in public housing to achieve self-sufficiency and become more financially independent. Some programs provide adults with job training and financial planning strategies that promote self-sufficiency and set goals to leave public housing and eventually buy a home in the general housing market. One specific example is the "Moving to Work" Program in central Florida. The program effectively encourages self-sufficiency for families who receive assistance, reduces costs and achieve greater cost effectiveness in federal expenditures, and increase housing choices for low-income families. The program increases self-sufficiency by removing or reducing rent disincentives for continued employment, income reporting, and family reunification during occupancy of assisted housing and providing supportive services through comprehensive resource centers to improve job training and employment opportunities.

**Discussion:**

In discussion with local government program administrators during the citizen participation process of the Consolidated Plan development, public housing trends in Florida have shifted from new construction of public housing developments and rehabilitation of existing public housing developments to the expansion of a voucher-based programs, due to the lack of incentives and available funding for extensive rehabilitation on the aging public housing units. The expansion of the voucher based programs allows privately owned multi-family rental developments to accept subsidy payments from public housing agencies by designating a portion of its rental units for low and very low income residents and increasing fair housing choice for residents who receive assistance from voucher based assistance programs. This trend has proven cost effective by allowing public housing agencies the ability to shorten waiting list times and use funds that were once designated for rehabilitation of public housing units, to other supportive housing needs efforts.

## **MA-30 Homeless Facilities – 91.310(b)**

### **Introduction**

The Council on Homelessness and Department of Children and Families 2014 Report on Homelessness states that in the 2014 Florida Legislative Session, the legislature recognized the importance of utilizing Housing Trust Fund resources to fund affordable housing. \$67,600,000 was appropriated to the SAIL, which funds affordable rental housing. The program requires 5-10 percent of the rental units produced must be available to persons with a disabling condition. In addition, \$10,000,000 of this allocation was restricted to projects serving persons with a developmental disability. An additional \$100,000,000 was appropriated to the State Housing Initiatives Program (SHIP), which is distributed to local communities to fund affordable housing. Communities must use 20 percent of this allocation to assist persons with a Special Need, with a priority for home modifications for persons with a developmental disability.

Persons with Special Needs as defined in Section 420.0004(13), Florida Statutes, means an adult person requiring independent living services in order to maintain housing or develop independent living skills and who has a disabling condition, a young adult formerly in foster care who is eligible for services under Section 409.1451(5), F.S., a survivor of domestic violence as defined in Section 741.28 F.S., or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans' disability benefits. In state fiscal year 2013-14, the Florida Housing Finance Corporation, through competitive application cycles, selected eleven Permanent Supportive Housing (PSH) developments for funding. These eleven PSH developments account for a total of 367 rental units that will be developed to serve extremely low and low-income homeless individuals and/or families.

Most, if not all, of the units in the developments selected have long term rental assistance for extremely low-income households tied to them. If not preserved and updated, these developments may be at risk of being sold or converted for other uses, resulting in the permanent loss of the federal rental assistance subsidies and displacement of the residents. In addition to the permanent supportive housing and preservation units, a total of 562 units will be set aside for extremely low-income households that are integrated into mixed-income affordable housing developments that were selected for financing in state fiscal year 2013- 14. These mixed-income developments will serve families, elders, and/or persons with developmental disabilities through a variety of financing resources including federal Low-Income Housing Tax Credits, state housing funds, private loans and foundation grants.

## Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	950	0	1,789	2,335	0
Households with Only Adults	6,725	0	7,233	8,270	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	5,705	0	0	0	0

**Table 42 - Facilities Targeted to Homeless Persons**

**Alternate Data Source Name:**

Point in Time Counts

**Data Source Comments:**

### Unit breakdown

- 97 permanent supportive housing units in rental developments of 15 units or less to be financed with grant funding appropriated by the 2013 Legislature;
- 148 permanent supportive housing units to serve at risk and homeless veterans with disabling conditions with federal low-income housing tax credits and state funding; and
- 122 permanent supportive housing units in Jacksonville, Miami-Dade and St. Petersburg to serve persons with disabling conditions that lack permanent and stable housing and have been identified by their communities as being high utilizers of emergency, shelter and institutional services.

These three developments will be part of private/public partnerships to study the costs and benefits of serving these special needs adults in permanent supportive housing tied to community-based services that are appropriate to meet the intended residents' needs. These developments will be financed with the assistance of SAIL funding and supplemental funding. Another 646 rental units in existing affordable



rental housing developments were awarded financing to update the property and units and to preserve units that have project-based federal rental assistance subsidies.

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Low or no cost health and social services available to the public are provided through a number of Florida agencies including healthcare through the DOH, mental health treatment and counseling through the DCF's Substance Abuse and Mental Health (SAMH) program, and foster care for youth through the DCF and the Florida State Foster/Adoptive Parent Association (FSFAPA). Additionally, job development/job training-placement programs are provided through the Department of Economic Opportunity's Workforce Centers located throughout the state. The agencies in the state with HUD-funded programs also fund projects to assist the homeless, support economic development projects requiring employment for low- to moderate- income workers (including a requirement for job training for these jobs when needed), as well as transitional housing and supportive services providing specialized programs for homeless persons experiencing mental health and substance abuse problems.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Response exceeds the allowable characters, please refer to Unique Appendices.

## MA-35 Special Needs Facilities and Services – 91.310(c)

### Introduction

Individuals and families with disabilities (i.e., mental, physical, developmental), persons with alcohol or other drug addictions, and persons with HIV/AIDs and their families receive supportive housing assistance that include on-site case management and referral and follow-up condition specific services, independent living skills, and activities that engage the participants in the community and prevent isolation, and transportation assistance to facilitate supportive service appointments. For the elderly, the services described are needed in addition to a higher degree of supervised independent living support, the provision of one or more meals per day, and safety devices such as grab bars in showers and tubs, along with electronic life safety intercoms to call for help.

The performance measures achieved for tenant based rental assistance household, permanent housing facilities, short term or transitional housing facilities and permanent facilities and short term rent, mortgage or utility assistance from the HOPWA program, as provided in Table 43.

### HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	54
PH in facilities	0
STRMU	1,370
ST or TH facilities	70
PH placement	222

**Table 303 – HOPWA Assistance Baseline**

**Alternate Data Source Name:**  
2013-2014 Consolidated Annual Performance Report

**Data Source Comments:**

### **To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The Agency for Persons with Disabilities (APD) reports that for the first time in eight years, APD offered waiver enrollment to nearly 1,600 people on the APD waiting list to receive needed services in their communities.

APD currently serves 30,057 individuals with developmental disabilities through the iBudget Florida waiver program. iBudget stands for individualized budget because each person's budget is based on their health and safety needs. Once an individual's budget is established, they can allocate the funding

to the services they want and need. The Home and Community Based Services (HCBS) Medicaid waiver offers a variety of services to help individuals with autism, cerebral palsy, spina bifida, intellectual disabilities, Down syndrome, or Prader-Willi syndrome live in their communities.

iBudget Florida provides to APD customers 27 services that fall under seven categories. The support activities and services are: Life Skills Development, Supplies and Equipment, Personal Support, Residential Services, Support Coordination, Therapeutic Support and Wellness, Transportation, and Dental Services.

APD currently has 21,191 individuals on the waiver waiting list. APD may provide one-time services to people on the waiting list or assist people with an emergency. The agency enrolls individuals into the waiver who meet the crisis criteria that include homeless, a danger to self or others, or a caregiver unable to provide care. Approximately 450 people are enrolled in the waiver each year.

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

In the State of Florida, certain transitional housing programs are specifically for persons with mental health disorders and provide mental health counseling and treatment as well as focused case-by-case support. Many of the state's permanent housing programs are specifically directed to persons with mental health and/or physical health disabilities in order to provide services and other assistance for these special needs persons and their families. Florida Department of Children and Families Mental Health Program Office is responsible for planning, managing and evaluating a statewide program of mental health services and support, including community programs, crisis services, state residential treatment facilities, and children's mental health services. The public mental health system is funded by federal block grant dollars and the Florida Legislature.

Though the state directly operates some of its mental health treatment facilities, Florida's community mental health system is completely privatized. Public funds are contracted through local Mental Health Program Offices, mostly with non-profit local Community Mental Health Centers. People who need services get them by going to those providers directly - the state mental health program offices do not provide services.

### **Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The State of Florida will continue many of the projects discussed in the previous Consolidated Plan. These activities will include housing development across all federal and state programs administered by Florida Housing Finance Corporation (not just HOME), providing assistance to senior citizens, AIDS

prevention, services for individuals with disabilities, providing shelters for victims of domestic violence, and services for children.

The state will continue, as long as funding permits, to administer the Affordable Housing Trust Fund and the Permanent Supportive Housing Notice of Funding Availability (NOFA) processes. These funding programs provide gap financing for the creation and/or preservation of affordable housing for those with special needs.

The state will continue to administer the HOPWA grant. HOPWA formula funds are used to contract with other government agencies and non-profit organizations to provide rental assistance, housing supportive services, technical assistance, and many other services for those who are at risk of homelessness, homeless, or are low-income persons living with HIV/AIDS. Transitional/Short-Term or Emergency Housing programs are expected to work individually with people living with HIV/AIDS in helping stabilize them and their transition to affordable permanent housing. Stabilization can include services related to a client's physical, mental and emotional needs. Beginning in 2016, the Florida Department of Health, the administrator of the HOPWA program, will expand Tenant-Based Rental Assistance (TBRA) activities statewide. In recent years, the state HOPWA program has only conducted TBRA activities in Monroe County. The expanded program will provide more affordable rental housing opportunities for persons with HIV/AIDS.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Not applicable.

## **MA-40 Barriers to Affordable Housing – 91.310(d)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The Department of Economic Opportunity and the other agencies that administer HUD funded housing programs prepared an *Analysis of Impediments to Fair Housing Choice, July 1, 2015 - June 30, 2020* to identify perceived impediments to fair housing and identify actions that the agencies can implement through their programs to help eliminate these perceived impediments. This section provides a summary of the *Analysis of Impediments* report.

Florida's Civil Rights and Fair Housing Acts (Chapter 760, F.S.) prohibits discriminating against individuals because race, color, religion, sex, national origin, age, handicap, marital status, and persons with or perceived to have AIDS. The statute makes it unlawful to discriminate in employment opportunities, in the sale and rental of housing, in brokerage services, financing of housing, in residential real estate transactions, and in land use and permitting of development. The statute includes a regulatory agency, the Commission on Human Resources to address complaints and authorized the Attorney General to take civil actions and impose penalties on violators.

Florida's Community Planning Act (Sections 163.3161-163.3217, F.S.) also affirmatively furthers fair housing. All local governments in Florida are required to prepare a comprehensive land use plan that is approved by the state. The comprehensive plan must identify housing needs for all existing and future residents for a minimum ten-year planning period. To ensure an adequate housing stock, the comprehensive plan must include principles, guidelines, standards, and strategies to meet expected demand for housing.

The results from the public meetings and surveys conducted in the preparation of the *Analysis of Impediments* report identified perceived impediments to fair housing choice related to renting to minorities, forcing tenants to break their lease or leave through intimidation, lack of sufficient affordable single-family and multifamily housing, accommodating the needs of persons with disabilities in rental housing, including pet fees for service animals and limiting the size of service animals, increased rents to renters using vouchers, and the need for more Section 8 housing assistance and, most importantly, a pathway to self-sufficiency through job training and placement services.

Suggestions to overcome these issues include better education and providing resource materials for persons with limited English proficiency, better access to legal resources, and updated information on fair housing agencies that can provide assistance.

Activities related to the suggested solutions to overcome the perceived impediments that can be implemented through the Florida Department of Economic Opportunity, the Florida Department of Health, the Florida Department of Children and Families, and the Florida Housing Finance Corporation include publishing fair housing resource materials on agency websites in different languages, coordinating with the Florida Commission on Human Resources in conducting annual workshops on fair housing, reviewing local comprehensive land use plans and amendments to ensure these plans address

the housing needs of all the residents of the community, requiring certain grant recipients to conduct quarterly fair housing activities and having a local fair housing coordinator to address complaints.

## MA-45 Non-Housing Community Development Assets -91.315(f)

### Introduction

The Florida Department of Economic Opportunity was established as an agency on October 1, 2011. The Department is committed to providing assistance for locating, retaining and growing businesses in Florida. DEO programs provide funding and technical assistance to rural communities to enhance economic development, provides reemployment assistance, and job placement and job retention through regional CareerSource Boards. DEO's Small Cities CDBG program funds economic development projects that require job retention or job creation, predominately for low- to moderate-income workers. DEO also coordinates efforts with Enterprise Florida, Inc. to market economic development incentives and provides other services and information to meet business needs.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	92,525	88,140	1	1	0
Arts, Entertainment, Accommodations	973,248	1,112,046	12	16	4
Construction	542,384	397,213	7	6	-1
Education and Health Care Services	1,753,165	1,641,476	21	23	2
Finance, Insurance, and Real Estate	634,559	515,491	8	7	-1
Information	166,761	137,867	2	2	0
Manufacturing	441,019	330,003	5	5	0
Other Services	439,870	252,397	5	4	-1
Professional, Scientific, Management Services	1,012,055	578,424	12	8	-4
Public Administration	397,060	434,816	5	6	1
Retail Trade	1,095,952	1,033,405	13	15	2
Transportation and Warehousing	414,490	265,032	5	4	-1
Wholesale Trade	239,548	326,536	3	5	2
Total	8,202,636	7,112,846	--	--	--

Table 314- Business Activity



**Alternate Data Source Name:**

2009-2013 ACS Workers

**Data Source Comments:** 2013 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	9,298,664
Civilian Employed Population 16 years and over	8,202,636
Unemployment Rate	11.80
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

Table 325 - Labor Force

Alternate Data Source Name:

2009-2013 ACS Workers

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	2,760,656
Farming, fisheries and forestry occupations	0
Service	1,677,942
Sales and office	2,278,846
Construction, extraction, maintenance and repair	749,587
Production, transportation and material moving	735,605

Table 336 – Occupations by Sector

Alternate Data Source Name:

2009-2013 ACS Workers

Data Source Comments:

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	819,827	63%
30-59 Minutes	382,080	29%
60 or More Minutes	100,236	8%
<b>Total</b>	<b>1,302,143</b>	<b>100%</b>

**Table 347 - Travel Time**

Data Source: 2007-2011 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	107,926	21,571	103,600
High school graduate (includes equivalency)	340,169	40,451	170,869
Some college or Associate's degree	387,756	33,710	142,632
Bachelor's degree or higher	298,909	14,258	77,105

**Table 48 - Educational Attainment by Employment Status**

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	10,021	17,646	18,195	36,336	49,660
9th to 12th grade, no diploma	55,254	42,286	40,550	78,128	78,244
High school graduate, GED, or alternative	97,300	115,870	130,468	306,529	233,270
Some college, no degree	79,056	87,169	94,914	223,878	135,380
Associate's degree	17,513	35,386	41,760	88,181	32,782
Bachelor's degree	13,007	53,609	66,518	143,180	80,511
Graduate or professional degree	1,152	17,541	29,993	85,013	60,152

**Table 359 - Educational Attainment by Age**

Data Source: 2007-2011 ACS

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,106
High school graduate (includes equivalency)	25,152
Some college or Associate's degree	31,130
Bachelor's degree	43,710
Graduate or professional degree	58,961

**Table 50 – Median Earnings in the Past 12 Months**

**Alternate Data Source Name:**

2009-2013 ACS Workers

**Data Source Comments:**

### Based on the Business Activity table above, what are the major employment sectors within the state?

According to the data provided in the Business Activity table, Florida's top five business sectors, based on jobs, are (1) Education and Health Care Services, (2) Arts, Entertainment, Accommodations, (3) Retail Trade, (4) Professional Scientific, Management Services, and (5) Finance, Insurance and Real Estate. Education and Health Care Services has the highest number of workers, 1,753,165 according to the data provided above. The data also shows a gap of 111,689 jobs to workers ratio, making it the third highest gap among all thirteen business sectors reported. The Retail Trade business sector is second, reporting 1,095,952 workers, with a gap of 62,547 jobs to workers ratio. While the Professional Scientific, Management Services business sector reports the highest gap with 433,631 jobs to workers ratio, the demand for jobs in that business sector is higher than the fourth and fifth ranked sectors. The Arts, Entertainment, Accommodations and Finance, Insurance and Real Estate business sectors are ranked fourth and fifth respectively, reporting over 634,000 workers in each category with an average gap of +2 percent jobs to workers ratio or about 19,730 workers to jobs available.

Some examples of jobs in the Education and Health Care Services business sector include teachers, education administration, doctors, nurses, and medical assistants. Some examples of the Arts, Entertainment, and Accommodations business sector include artists, musicians, hotel clerks, housekeeping staff, and travel agents. Some examples of jobs in the Retail Trade business sector include retail associates, store clerks, store managers, boutique owners, and cashiers. Some examples of jobs in the Professional, Scientific, and Management Services business sector include legal advice and representation, accounting, engineering, architecture, and advertising services. Some examples of jobs in Finance, Insurance, and Real Estate business sector include bankers, lenders, financial analysts, insurance agents, and realtors.

**Describe the workforce and infrastructure needs of business in the state.**

In the Small Cities CDBG program, the typical infrastructure needs funded through the economic development grants have been road improvements, and the extension of water and sewer lines. It is anticipated that these infrastructure needs will continue.

According to the Labor Force data provided above, the total unemployment rate in 2013 was 11.8 percent. As of April 2015, the unemployment rate is 5.6 percent. Although there are numerous jobs types available for all persons, regardless of educational attainment level, in each of the five top business sectors in Florida, there are large gaps in the jobs to workers ratios.

**Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Not applicable at this time.

**How do the skills and education of the current workforce correspond to employment opportunities in the state?**

Because of the employment opportunities and job types within all thirteen of the business sectors in Florida, employment opportunities are well distributed for segments of the workforce population, regardless of skills and educational attainment levels. According to the Educational Attainment by Age table above, persons 45-64 years old that graduated high school, received a GED or alternative educational attainment level make up the highest segment of the workforce population with 306,529 persons. Persons 18-24 years old with a graduate or professional degree educational attainment level make up the lowest segment of the workforce population. Persons, across all age groups, with a high school degree, received a GED or alternative educational attainment make up for the largest segment of the workforce population with 883,437 persons.

According to the Occupations by Sector table above, 2,760,656 persons in the workforce reported that they are employed in the management, business and financial sector. Management, business and financial occupations would fall under any of the thirteen business sectors in Florida. That equates to 7,112,846 job possibilities in Florida. Other occupation sectors reporting high numbers of persons in the workforce are employed in sales and offices with 2,278,846 employees and construction, extraction, maintenance and repair with 749,587 employees. Both of

these occupation sectors can provide employment opportunities for all educational attainment levels in at least twelve of the thirteen business sectors equating to 6,534,422 job possibilities.

**Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.**

The Florida Department of Economic Opportunity currently partners with nineteen CareerSource employment programs throughout the state. A list of the workforce employment programs can be found in the Department's website at [www.floridajobs.org/office-directory/division-of-workforce-services/workforce-programs](http://www.floridajobs.org/office-directory/division-of-workforce-services/workforce-programs).

These workforce programs provide employment opportunities to all segments of the population by providing job training and placement to a variety of business sectors through employment provider partners. Some programs are specifically for placing persons with disabilities and veterans into jobs in order to maintain self-sufficiency, while other programs offer re-employment of dislocated workers due to lay-offs or economic downturn.

The Small Cities CDBG program requires job training for any economic development funded projects if more than a high school education is needed to hire the required low- to moderate-income employees.

All of these programs are viewed as being important to the implementation of the goals and performance measures of the Consolidated Plan and are commonly used in conjunction with the federal funded programs described within the Consolidated Plan.

**Describe any other state efforts to support economic growth.**

The Florida Strategic Plan for Economic Development establishes a partnership of public, private, and civic organizations. The purpose of the Strategic Plan is to guide the state to achieve the goals to lead the nation in (1) global competitiveness as a location for business, investment, talent, innovation, and visitors; (2) economic growth and prosperity; and (3) quality of life. To achieve these goals, the Strategic Plan has four Cross-Cutting Strategies to strengthen, develop, and implement collaboration and coordination among state, regional, and local entities. The Strategic Plan also identifies 25 Area-Specific Strategies to ensure Florida has the Talent Supply and Education, promotes Innovation and Economic Development, provides the Infrastructure and Growth Leadership, establishes a Business Climate and Competiveness, a supporting Civic and Governance System, and a Quality of Life and Quality Places environment that businesses are looking for and need to be successful.

## **Discussion**

In conclusion, Florida has several non-housing community development assets that support economic growth and sustainability when it comes to workforce and business sector opportunities. Though Florida was affected by the downturn in the economy in 2008, Florida's emphasis on attracting new business to the state and creating opportunities to expand existing businesses is having a positive effect on creating jobs and lowering the unemployment rate in the state. Florida has added 841,000 jobs since December 2010 and, as of April 2015, the state's unemployment rate is 5.6 percent. The agencies with HUD-funded programs, through this Consolidated Plan, will continue to be beneficial to Florida's workforce and business sectors, while creating new strategies to ensure economic growth continues.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

In general, any municipality and unincorporated county areas may have a concentration of households with multiple housing problems. However, compiled data to directly address this issue is not available. Therefore, it is assumed that areas with the highest percentage of residents living below the poverty level may most likely include a similar concentration of households with multiple housing problems. Readily available information may only allow a determination at a county level.

For this analysis, counties with a percentage of persons living in poverty above the state average will be considered as areas with a concentration of households with multiple housing problems.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

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

### **What are the characteristics of the market in these areas/neighborhoods?**

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

### **Are there any community assets in these areas/neighborhoods?**

Typically municipalities and counties use code enforcement to address substandard housing conditions; however, households with low or very-low incomes may not have the financial ability to address the needed improvements. This difficulty is more pronounced in rural areas where there are usually no or very few organizations that can undertake home improvement repairs for little or no cost to the home owner.

### **Are there other strategic opportunities in any of these areas?**

The Florida Small Cities CDBG program provides funding for housing rehabilitation projects to low- to moderate-income homeowners. Florida Housing Finance Corporation offers a variety of housing financing options, and entitlement communities may be allocated State Housing



Initiatives Partnership (SHIP) program funds to address housing issues. HOME funding at both the local entitlement level and from the state is also available.

In addition, all local governments in Florida are required to prepare a comprehensive land use plan that includes a housing element. The housing element is required to include data and analysis identifying current and projected housing needs for a minimum 10-year period. The data and analysis must address the number and distribution of dwelling units by type, tenure, age, rent, value, monthly cost of owner-occupied units, and rent or cost to income ratio, the creation and preservation of affordable housing, the availability of housing sites, the distribution of housing for a range of incomes and types (including mobile homes, manufactured homes, group homes and foster care facilities), household size, age of residents, and the number of substandard units. To meet unmet current and future housing needs, the housing element must include principles, guidelines, standards, and strategies to address these housing needs. The housing element must also address streamlining the permitting process, minimize costs and delays in providing affordable housing, avoid the concentration of affordable housing units only in specific areas of the community, and ensure the provision of adequate infrastructure and public facilities. Local land development regulations also must be adopted that are consistent with and implement the local comprehensive plan and are required to address incentive and inclusionary zoning (Section 163.3202(3), F.S.).

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The purpose of the Strategic Plan section of the Consolidated Plan is to use the information from the data and analysis in the Needs Assessment and Market Analysis sections of the plan to determine how and where the HUD-funded agencies should prioritize the programs they fund to help alleviate deficiencies in community housing and non-housing development categories. This section also discusses the use of leverage funds to maximize the use of HUD funding to increase the number of housing and non-housing projects.

## SP-10 Geographic Priorities – 91.315(a)(1)

### Geographic Area

Table 361 - Geographic Priority Areas

<b>1</b>	<b>Area Name:</b>	STATEWIDE
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	<p>The programs administered by the DOH, DCF, FHFC, and DEO are applied statewide. The DEO Small Cities CDBG program only applies to non-entitlement municipalities (populations under 50,000) and counties (populations of under 200,000 in the unincorporated areas.). Non-entitlement local governments do not receive funding directly from HUD.</p> <p>FHFC works with both the public and private sector throughout the state to assist in determining the affordable housing needs that can be served through the HOME, <u>NHTF</u> and other housing programs.</p>
	<b>Include specific housing and commercial characteristics of this target area.</b>	<p>The DEO Small Cities CDBG program does not identify target areas. Grants are awarded statewide to non-entitlement municipalities and counties through an annual competitive application process.</p> <p>Not applicable for State HOPWA</p> <p>HOME <u>and</u> <u>NHTF</u> are statewide, and the characteristics of local areas where HOME <u>and</u> <u>NHTF</u> might be used are wide ranging.</p>

<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The DEO Small Cities CDBG program does not identify target areas. Grants are awarded statewide to non-entitlement municipalities and counties through an annual competitive application process.</p> <p>Not applicable for State HOPWA.</p> <p>As with FHFC's continuing process to seek feedback on all of its programs, we heard that affordable housing is needed in many areas of the state.</p>
<p><b>Identify the needs in this target area.</b></p>	<p>The DEO Small Cities CDBG program does not identify target areas. Grants are awarded statewide to non-entitlement municipalities and counties through an annual competitive application process. Applicants conduct a public meeting to receive citizen input on a local community's priority needs prior to preparing a grant application.</p> <p>Not applicable for State HOPWA.</p> <p>FHFC finds that affordable rental housing needs are very high throughout the state, particularly in urban and suburban areas as evidenced by high occupancy rates in its rental portfolio.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>The Small Cities program awards grants fund improvements for economic development (job creation or retention), housing rehabilitation, neighborhood revitalization (infrastructure improvements) and commercial revitalization (improvements to the business district).</p> <p>For affordable housing funding through the <u>HOME and NHTF programs</u>, the opportunities are simply to assist in financing more housing and access to housing, <u>including more housing for extremely low-income households.</u></p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The Small Cities CDBG program often receives more applications for housing rehabilitation and neighborhood revitalization grants than can be funded.</p> <p>Not applicable for State HOPWA.</p> <p>For affordable housing through the <u>HOME and NHTF programs</u>, the most important barrier is having enough funding to meet the need.</p>

## General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The Florida Department of Health currently contracts with eleven project sponsors to administer the State HOPWA Program in a designated geographic area, the majority of which are rural. Ten of Florida's fourteen Ryan White Part B consortia/planning bodies provide recommendations for needs assessments, planning, and prioritization for state HOPWA funds. The five-consortia/planning body areas not listed are eligible metropolitan statistical areas (EMSA) 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 sixteen counties.

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

- Area 1: Lutheran Services Florida, Inc. Northwest (Escambia, Okaloosa, Santa Rosa, and Walton Counties)
- Area 2A: Basic NWFL Inc. (Bay, Calhoun, Gulf, Holmes, Jackson, Washington Counties)
- Area 2B: Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, and Wakulla Counties)
- Area 3/13: WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee, and Union Counties)
- Area 6: Hillsborough County Health Department (Manatee County)
- Area 7: United Way of Brevard County, Inc. (Brevard County)
- Area 11B: Monroe County Health Department (Monroe County)
- Area 12: Health Planning Council of Northeast Florida, Inc. (Flagler and Volusia Counties)
- Area 14: Polk County Health Department (Highlands, Hardee and Polk Counties)
- Area 15: St. Lucie County Health Department (Indian River, Martin, Okeechobee, and St. Lucie Counties)

Non-HOPWA Grantees: Describe the basis for allocating investments geographically within the jurisdiction.

NHTF program funds will be made available in tandem with other financing as part of a comprehensive annual funding plan that is 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. NHTF funding will be made available across 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 3-5 years to ensure geographic distribution and to respond to rental needs studies carried out by and for FHFC.

### **Describe the basis for allocating geographically within the state**

The Florida Small Cities program does not allocate funding resources geographically. Instead, each year a Notice of Funding Availability 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.

Allowing the local governments to establish their priority need based on the above described process is beneficial to CDBG subgrantees. It allows the Department 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 non-profit 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 non-profit recipients must consult with the Continuum of Care Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.

The geographic allocation of HOME funds is dependent on the particular strategy. An ongoing priority is to allocate financing for small rental properties in rural areas, which may also include rural parts of larger counties. Funds for homeownership are often tied to rural Self Help programs. In some cases when a particular special need is identified, such as a need for homeless housing even in a more urban area, HOME

funds may be used to provide gap financing for such a project. Because the FHFC typically has additional state funding that can be used to finance rental housing, HOME funds may be able to be used for other purposes depending on the need. The FHFC distributes HOME funds either through a Request for Applications process or a reservation system.

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 372 – Priority Needs Summary

1	<b>Priority Need Name</b>	Job Creation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Commercial Revitalization Economic Development
	<b>Description</b>	Economic Development activities and projects that promote job creation or sustain job creation in an eligible Florida jurisdiction.
	<b>Basis for Relative Priority</b>	Economic Development activities involving job creation are a high priority determined by needs identified in the latest Florida Small Cities CDBG Program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
2	<b>Priority Need Name</b>	Street Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate



	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Neighborhood Revitalization
	<b>Description</b>	Street Improvements involving street paving, pothole repair, and other eligible activities under this category.
	<b>Basis for Relative Priority</b>	Street Improvement activities are a high priority determined by needs identified in the latest Florida Small Cities CDBG Program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
<b>3</b>	<b>Priority Need Name</b>	Sewer Line Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Neighborhood Revitalization
	<b>Description</b>	Installation of new or repair of existing sewer line systems or hookups.
	<b>Basis for Relative Priority</b>	Sewer Line Improvement activities are a high priority determined by needs identified in the latest Florida Small Cities CDBG Program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
<b>4</b>	<b>Priority Need Name</b>	Water Line Improvements
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Neighborhood Revitalization
	<b>Description</b>	Installation of new or repair of existing water line systems or hookups.
	<b>Basis for Relative Priority</b>	Water Line Improvement activities are a high priority determined by needs identified in the latest Florida Small Cities CDBG Program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
5	<b>Priority Need Name</b>	Flood and Drainage
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Neighborhood Revitalization
	<b>Description</b>	Installation of new or repair of existing flood and drainage systems to prevent flooding from stormwater caused by extreme weather conditions and seasonal weather patterns.
	<b>Basis for Relative Priority</b>	Flood and drainage activities are a high priority determined by needs identified in the latest Florida Small Cities CDBG Program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.

6	<b>Priority Need Name</b>	Street Outreach to Homeless Persons
	<b>Priority Level</b>	High
	<b>Population</b>	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Street Outreach
	<b>Description</b>	Outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individual needs and 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 throughout Florida.
	<b>Basis for Relative Priority</b>	Street Outreach activities to homeless persons are a high priority determined by needs identified in the latest Emergency Solutions Grant Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
7	<b>Priority Need Name</b>	Emergency Shelters and Transitional Housing
	<b>Priority Level</b>	High

	<b>Population</b>	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Emergency Shelter and Transitional Housng
	<b>Description</b>	Operation and maintenance funding for emergency shelters and transitional housing providers.
	<b>Basis for Relative Priority</b>	Operation and maintenance activities for emergency shelters and transitional housing are a high priority determined by needs identified in the latest Emergency Solutions Grant Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
<b>8</b>	<b>Priority Need Name</b>	Homeless Prevention
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Families with Children Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Permanent Housing for Homeless Persons
	<b>Description</b>	Homeless prevention activities and rapid re-housing activities for homeless persons or persons at high risk for homelessness.
	<b>Basis for Relative Priority</b>	Homeless prevention activities to homeless persons or at high risk of homelessness are a high priority determined by needs identified in the latest Emergency Solutions Grant Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
9	<b>Priority Need Name</b>	Affordable Rental Housing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Affordable Rental Housing Rental and Homeownership Activities (CHDOs) Affordable Rental Housing for Extremely Low Income
	<b>Description</b>	Activities involving the production and rehabilitation of affordable housing units and rental assistance to extremely low-, very low-, and low-income beneficiaries.  <u>Substantial Amendment for NHTF:</u> <ul style="list-style-type: none"> <li>• <u>Persons and Families that are Homeless or At Risk of Homelessness</u></li> <li>• <u>Persons with Special Needs</u></li> </ul>
	<b>Basis for Relative Priority</b>	Affordable rental housing activities for extremely low-, very low-, and low-income persons/households are a high priority determined by needs identified in this plan and during the Citizen Participation process.
10	<b>Priority Need Name</b>	Affordable Ownership Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate

	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Affordable Homeownership Housing Housing Rehabilitation Rental and Homeownership Activities (CHDOs)
	<b>Description</b>	Activities involving homebuyer assistance, such as down payment assistance, construction and rehabilitation activities for low- and moderate-income beneficiaries.
	<b>Basis for Relative Priority</b>	Affordable ownership housing activities for low- and moderate- income homebuyers are a high priority determined by needs identified in this plan and during the Citizen Participation process.
<b>11</b>	<b>Priority Need Name</b>	Short Term Rent, Mortgage and Utility Payments
	<b>Priority Level</b>	High
	<b>Population</b>	Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Housing and Supportive Services
	<b>Description</b>	Activities that involve providing financial housing assistance in the form of rent, mortgage and utility payments for persons with HIV/AIDS.
	<b>Basis for Relative Priority</b>	Short-term rent, mortgage, and utility payments persons with HIV/AIDS are a high priority determined by needs identified in the latest Housing Opportunities for Persons with AIDS (HOPWA) program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
<b>12</b>	<b>Priority Need Name</b>	Short Term Supported Housing Facility Assistance

	<b>Priority Level</b>	High
	<b>Population</b>	Persons with HIV/AIDS Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Housing and Supportive Services
	<b>Description</b>	Activities involving short-term supported housing facility assistance for operation and maintenance of supportive housing programs, counseling and healthcare services for persons with HIV/AIDS.
	<b>Basis for Relative Priority</b>	Short-term supported housing facility assistance activities are a high priority determined by needs identified in the latest Housing for Persons with HIV/AIDS (HOPWA) program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
13	<b>Priority Need Name</b>	Supportive Services
	<b>Priority Level</b>	High
	<b>Population</b>	Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Housing and Supportive Services
	<b>Description</b>	Activities in the form of assistance to housing facility providers to provide supportive services, such as housing assistance, counseling and health care services to persons with HIV/AIDS.



	<b>Basis for Relative Priority</b>	Supportive services activities for persons with HIV/AIDS are a high priority determined by needs identified in the latest Housing Opportunities for Persons with HIV/AIDS (HOPWA) program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
14	<b>Priority Need Name</b>	Housing Placement Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Persons with HIV/AIDS Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	STATEWIDE
	<b>Associated Goals</b>	Housing and Supportive Services
	<b>Description</b>	Activities involving assistance to housing facility providers to provide housing placement services for persons with HIV/AIDS.
	<b>Basis for Relative Priority</b>	Housing placement assistance activities for persons with HIV/AIDS are a high priority determined by needs identified in the latest Housing Opportunities for persons with HIV/AIDS (HOPWA) program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.
15	<b>Priority Need Name</b>	Tenant Based Rental Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	STATEWIDE

<b>Associated Goals</b>	Housing and Supportive Services
<b>Description</b>	Activities involving assistance to housing providers to provide tenant based rental assistance to persons with HIV/AIDS.
<b>Basis for Relative Priority</b>	Tenant-based rental assistance activities for persons with HIV/AIDS are a high priority determined by needs identified in the latest HOME Investment Partnership program Consolidated Annual Performance Report and during the Citizen Participation process through comments received in the public meetings and hearings, as well as the Consolidated Plan survey responses.

**Narrative (Optional)**

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

Substantial Amendment for NHTF:

Based on need studies, FHFC’s supportive housing strategy developed in concert with stakeholders and legislative direction over ten years, as well as the public workshops held before and as the NHTF allocation plan was developed, there is a high need for units that are affordable to extremely low income persons, particularly those with incomes at the Supplemental Security Income (SSI) level. These households have limited access to decent, affordable housing, and few new units of housing or rental assistance affordable to these residents are being made available with current program resources. 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. These households have limited access to decent, affordable housing, and few new units of housing or rental assistance affordable to these residents are being made available with current program resources. In a June 2016 evaluation of resident incomes served throughout Florida Housing Finance Corporation’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. In particular, there is a need for units to serve persons and families at this income level who have special needs or who are homeless or at risk of homeless and need access to supportive services along with the housing to help them live independently in their communities. Thus, an additional priority is to provide housing units for these households integrated into general occupancy affordable housing properties (i.e., properties that serve family and elderly households with a

range of incomes up to 60 percent of area median income in most cases) to provide opportunities for residents at this income level to live integrated in their communities.

Although the number of units developed for these households will change over the five-year planning period based on funding, the focus of this housing will remain the same.

#### Annual Affordable Rental Housing Goals

- Production of new units: 66 units

#### Annual Affordable Housing Goals

- Rental units constructed: 66 units

## SP-30 Influence of Market Conditions – 91.315(b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<ul style="list-style-type: none"> <li>• Availability of affordable single family and multifamily rental housing stock for families of all sizes where owners will be willing to accept TBRA</li> <li>• Availability of administrative agencies to determine eligibility terms and conditions of such a program</li> </ul>
TBRA for Non-Homeless Special Needs	<ul style="list-style-type: none"> <li>• Availability of affordable single family and multifamily rental housing stock for persons with disabilities and their families where owners will be willing to accept TBRA</li> <li>• Availability of administrative agencies to determine eligibility terms and conditions of such a programs</li> <li>• Availability of administering agencies to evaluate and ensure accommodations and modifications for persons with disabilities and their families</li> <li>• Availability of supportive services, when necessary</li> </ul>
New Unit Production	<ul style="list-style-type: none"> <li>• Local land use policies and jurisdiction comprehensive planning goals that support the development of accessible multifamily housing stock for lower income renters, <u>including those with incomes at SSI levels, persons with disabilities and their families, persons and families that are homeless, and those at risk of homelessness; and that support an integrated housing approach to allow persons and families that need supportive services to live integrated in their communities.</u></li> <li>• Current cost of materials for new unit production</li> <li>• Availability of incentives to developers to produce new single family and multifamily affordable housing units</li> </ul>
Rehabilitation	<ul style="list-style-type: none"> <li>• Current cost of materials for rehabilitation</li> <li>• Availability of funding for housing rehabilitation activities</li> </ul>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	<ul style="list-style-type: none"> <li>• Availability of funding for acquisition activities</li> <li>• Evaluation of fair market prices for home purchases</li> <li>• Cost of materials for redevelopment of historic housing structures</li> </ul>

**Table 383 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)**

**Introduction**

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

Substantial Amendment for NHTF:

For fiscal year 2016, the state NHTF Program will receive a total allocation of \$4,598,821. All of this funding (minus 10 percent for administration) will be reserved for applicants that commit to set aside a small portion of units in their developments to serve households with incomes at approximately 22 percent of area median and that are homeless, at risk of homelessness, or include an adult person with a special need. Funding will be made available in tandem with other affordable rental financing through one or more competitive Requests for Application that are based on state and federal requirements, including the NHTF program regulations.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	24,019,316	43,491	1,421,063	25,483,870	87,507,555	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
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	12,251,406	7,053,243	6,890,927	26,195,576	70,327,669	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR92

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	3,357,058	0	7,450,153	10,807,211	14,450,734	The annual allocation and any program income or prior year resources will be allocated to eligible HOPWA categories per 24 CFR 574
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,019,268	0	1,052,813	6,072,081	18,127,919	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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund	public - federal	Other	4,598,821	0	0	4,598,821	13,796,463	The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93.

Table 394 - Anticipated Resources

**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.

Substantial Amendment for NHTF:

National Housing Trust Fund - Provides funds to developers of affordable rental housing that construct new housing for extremely low income households. This funding can assist FHFC in creating financing opportunities with some or all of the programs listed here to enable assisted units to serve lower income residents than could be done by each program separately.

**If appropriate, describe publically owned land or property located within the state 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 Small Cities 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 2015-2020. Other resources available from other funding sources are encouraged to supplement HUD funded activities.

## SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
DEPARTMENT OF ECONOMIC OPPORTUNITY (STATE OF FLORIDA)	Departments and agencies	Economic Development neighborhood improvements public facilities	State
FLORIDA HOUSING FINANCE CORPORATION	Departments and agencies	Ownership Rental	State
Florida Department of Health	Departments and agencies	Non-homeless special needs	State
Florida Department of Children and Families	Departments and agencies	Homelessness	State
	Departments and agencies	Homelessness Rental	State

Table 405 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

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

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance			
Mortgage Assistance			X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse			X

Supportive Services			
Child Care			
Education			
Employment and Employment Training	X	X	X
Healthcare			
HIV/AIDS			X
Life Skills			
Mental Health Counseling	X	X	X
Transportation			
Other			

Table 416 - Homeless Prevention Services Summary

**Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction**

Both the ESG and the HOPWA Programs provide funding for the services identified above. Generally, the state grantor programs allocate specific amounts of funding to units of local governments and non-profit housing providers in small jurisdictions to implement programs and initiatives locally and distribute the funds for the direct benefit of the homeless and persons with HIV/AIDS populations. A designated amount of funds will be used by the service provider for administration costs. Administration costs typically consist of staff hours, training and education workshops, and education materials that are for targeting program beneficiaries. The remaining funds are designated for eligible activities such as rental assistance, utility assistance, transitional housing, and mental health counseling services. The HOPWA program places emphasis on the connection between housing assistance and appropriate supportive services available through HOPWA and other funding sources, such as Ryan White Part B and state general revenue. Therefore, support services that contribute to stable housing will be readily available to HOPWA clients.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Strengths of the Service Delivery System

- By allowing local service providers to designate funding, the grantor agency can assure confidence that the funding is being allocated to services and areas of the community that have the most urgent need
- Local service providers understand the needs for their particular community, so they are constantly updating the latest data in order to properly allocate funding the segment of the population with the highest need
- Local services providers are well connected in small jurisdictions, this allows the providers to choose the most financially feasible options to ensure that each federal funding dollar is spent wisely

Gaps in the Service Delivery System

- Service providers for specific types of eligible activities, such as mental health counseling, may not be available in the direct vicinity of a small jurisdiction
- Local service providers may not have the staff available to properly educate and work with a large client base
- The amount of funding for a small jurisdiction may not be sufficient to address urgent need and could cause public confusion or disruption

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Grantor agencies are constantly creating new innovative strategies to address gaps in their funding delivery systems. Some traditional examples of strategies being used are to leverage funds from other eligible grant programs or initiatives with existing allocations, provide more technical assistance funding to enhance outreach, and create spending caps on specific eligible categories to ensure that the funding dollars are being properly distributed. These traditional strategies are not always effective, but they are the most commonly used because of their practicality. More innovative strategies include using technology, such as social surveys and social media devices, to constantly monitor the changing population in order to adjust their outreach and delivery methods to meet the priority needs of the community.

## SP-45 Goals Summary – 91.315(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Neighborhood Revitalization	2015	2019	Non-Housing Community Development	STATEWIDE	Flood and Drainage Sewer Line Improvements Street Improvements Water Line Improvements	CDBG: \$42,936,685	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 170000 Persons Assisted
2	Housing Rehabilitation	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing	CDBG: \$28,247,820	Homeowner Housing Rehabilitated: 600 Household Housing Unit
3	Economic Development	2015	2019	Non-Housing Community Development	STATEWIDE	Job Creation	CDBG: \$34,349,495	Jobs created/retained: 500 Jobs
4	Commercial Revitalization	2015	2019	Non-Housing Community Development	STATEWIDE	Job Creation	CDBG: \$7,457,425	Facade treatment/business building rehabilitation: 25 Business
5	Street Outreach	2015	2019	Homeless	STATEWIDE	Street Outreach to Homeless Persons	ESG: \$1,200,000	Homelessness Prevention: 100 Persons Assisted
6	Emergency Shelter and Transitional Housng	2015	2019	Homeless	STATEWIDE	Emergency Shelters and Transitional Housing	ESG: \$8,500,000	Homeless Person Overnight Shelter: 105 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Permanent Housing for Homeless Persons	2015	2019	Affordable Housing	STATEWIDE	Homeless Prevention	ESG: \$14,500,000	Housing for Homeless added: 185 Household Housing Unit
8	Rental and Homeownership Activities (CHDOs)	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing Affordable Rental Housing	HOME: \$9,188,555	Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted
9	Affordable Rental Housing	2015	2019	Affordable Housing	STATEWIDE	Affordable Rental Housing	HOME: \$8,733,469	Rental units rehabilitated: 1000 Household Housing Unit
10	Affordable Homeownership Housing	2015	2019	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$43,667,345	Direct Financial Assistance to Homebuyers: 200 Households Assisted
11	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 Supportive Services Tenant Based Rental Assistance	HOPWA: \$25,257,945	Housing for People with HIV/AIDS added: 1000 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Affordable Rental Housing for Extremely Low Income	2016	2019	Affordable Housing	STATEWIDE	Affordable Rental Housing	Housing Trust Fund: \$18,395,284	Rental units constructed: 66 Household Housing Unit

Table 427 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 38 percent of the total Fiscal Year 2015 CDBG allocation to the Neighborhood Revitalization category 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.
2	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 25 percent of the total Fiscal Year 2015 CDBG allocation 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.
3	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 30.40 percent of the total Fiscal Year 2015 CDBG 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.

4	<b>Goal Name</b>	Commercial Revitalization
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 7 percent of the total Fiscal Year 2015 CDBG allocation to the Commercial Revitalization category 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.
5	<b>Goal Name</b>	Street Outreach
	<b>Goal Description</b>	The ESG program as allocated over \$240,000 from the 2015 annual funding allocation to fund local street outreach programs. The programs 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 through Florida.
6	<b>Goal Name</b>	Emergency Shelter and Transitional Housing
	<b>Goal Description</b>	The ESG program has allocated \$1,700,000 from the 2015 annual allocation to fund emergency shelter facilities. This funding will enable the Department to provide emergency shelter for approximately 21 shelter facilities, including domestic violence facilities, throughout the state.
7	<b>Goal Name</b>	Permanent Housing for Homeless Persons
	<b>Goal Description</b>	The ESG program allocated \$2,900,000 from the 2015 annual allocation to fund homelessness prevention and rapid re-housing activities. Based on past funding models, the Department expects to fund approximately 37 housing providers throughout Florida.
8	<b>Goal Name</b>	Rental and Homeownership Activities (CHDOs)
	<b>Goal Description</b>	The HOME program has allocated \$1,837,711 from the 2015 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.
9	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	The HOME program has allocated \$8,733,469 from the 2015 annual funding allocation and program income and de-obligated funding to fund affordable rental housing through a Request for Application (RFA) process. Funding can be used for activities such as construction, rehabilitation, and rental assistance for low- and moderate-income households.



<b>10</b>	<b>Goal Name</b>	Affordable Homeownership Housing
	<b>Goal Description</b>	The HOME program has allocated \$8,733,469 from the 2015 annual funding allocation and program income and de-obligated funding to fund affordable homeownership housing either through a Request for Application (RFA) process or through a reservation process. Funding can be used for homebuyer assistance activities, such as down payment assistance and construction activities.
<b>11</b>	<b>Goal Name</b>	Housing and Supportive Services
	<b>Goal Description</b>	The HOPWA program has allocated \$5,051,589 of the 2015 Annual Allocation to fund activities, carried out by the 11 certified projects sponsors throughout Florida, including financial assistance in the form of short-term rent, mortgage and utility payments, supportive housing services (i.e., counseling and healthcare services), and tenant-based rental assistance for persons with HIV/AIDS.
<b>12</b>	<b>Goal Name</b>	Affordable Rental Housing for Extremely Low Income
	<b>Goal Description</b>	<u>The NHTF program has allocated \$4,598,821 from the 2016 annual funding allocation to fund affordable rental housing for extremely low income households through an RFA process. Funding may be used for activities including construction, demolition, acquisition or real property, related soft costs and operating cost reserves funded with operating assistance.</u>

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The State Small Cities CDBG program does not provide funding for affordable housing because there are other state programs that address new construction and other affordable housing needs. Instead, the CDBG program has determined that a priority need exists to provide grants to local communities to rehabilitate substandard housing.

According to the 2015-2016 HOME program Annual Action Plan, the State HOME program, administered by the Florida Housing Finance Corporation, plans to provide construction funds for the production of 250 new affordable rental housing units, provide rental assistance for 500 extremely low-income, low-income and moderate income households, and homebuyer assistance to low and moderate income households with an income of less than 80 percent AMI as defined by HOME 91.315 (b)(2).

Though the ESG and HOPWA programs provide affordable housing services and opportunities for extremely low-, low-income eligible beneficiaries, they do not estimate a number of beneficiaries who will receive affordable housing in their Annual Action Plans.

## **SP-50 Public Housing Accessibility and Involvement – 91.315(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Not applicable to the Florida's Small Cities CDBG, HOME, ESG, and HOPWA programs.

#### **Activities to Increase Resident Involvements**

- 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

#### **Is the public housing agency designated as troubled under 24 CFR part 902?**

Yes

#### **Plan to remove the 'troubled' designation**

According to the State of Florida 2011-2015 Consolidated Plan, there were nine public housing agencies (PHAs) assigned a troubled designation according to regulations defined by 24 CFR part 902. HUD provided a special allocation of grant funds to complete improvements to correct substandard housing problems discovered during a monitoring visit by field agents from the HUD Office of Public and Indian Housing. As of 2013, only one of the nine PHAs on the list provided in 2010 was still designated as troubled. However, as of June 2013, there were three PHAs which had received troubled designations between 2011 and 2013.

The three PHAs, designated as troubled, are still able to receive funding allocations from HUD, but are subject to frequent auditing and assistance from the HUD Office of Public and Indian Housing and must submit progress reports on a scheduled timeline. With the enhanced monitoring and an opportunity for staffing increases, management and operation improvements can be achieved faster and short and long term goals can be created in order to maintain successful practices and have the troubled designated removed.

## **SP-55 Barriers to affordable housing – 91.315(h)**

### **Barriers to Affordable Housing**

The Department of Economic Opportunity and the other agencies that administer HUD funded housing programs prepared an *Analysis of Impediments to Fair Housing Choice, July 1, 2015 - June 30, 2020* to identify perceived impediments to fair housing and identify actions that the agencies can implement through their programs to help eliminate these perceived impediments. This section provides a summary of the *Analysis of Impediments* report.

Florida's Civil Rights and Fair Housing Acts (Chapter 760, F.S.) prohibits discriminating against individuals because race, color, religion, sex, national origin, age, handicap, marital status, and persons with or perceived to have AIDS. The statute makes it unlawful to discriminate in employment opportunities, in the sale and rental of housing, in brokerage services, financing of housing, in residential real estate transactions, and in land use and permitting of development. The statute includes a regulatory agency, the Commission on Human Resources to address complaints and authorized the Attorney General to take civil actions and impose penalties on violators.

Florida's Community Planning Act (Sections 163.3161-163.3217, F.S.) also affirmatively furthers fair housing. All local governments in Florida are required to prepare a comprehensive land use plan that is approved by the state. The comprehensive plan must identify housing needs for all existing and future residents for a minimum ten-year planning period. To ensure an adequate housing stock, the comprehensive plan must include principles, guidelines, standards, and strategies to meet expected demand for housing.

The results from the public meetings and surveys conducted in the preparation of the *Analysis of Impediments* report identified perceived impediments to fair housing choice related to renting to minorities, forcing tenants to break their lease or leave through intimidation, lack of sufficient affordable single-family and multifamily housing, accommodating the needs of persons with disabilities in rental housing, including pet fees for service animals and limiting the size of service animals, increased rents to renters using vouchers, and the need for more Section 8 housing assistance and, most importantly, a pathway to self-sufficiency through job training and placement services.

Suggestions to overcome these issues include better education and providing resource materials for persons with limited English proficiency, better access to legal resources, and updated information on fair housing agencies that can provide assistance.

Activities related to the suggested solutions to overcome the perceived impediments that can be implemented through the Florida Department of Economic Opportunity, the Florida Department of Health, the Florida Department of Children and Families, and the Florida Housing Finance Corporation include publishing fair housing resource materials on agency websites in different languages, coordinating with the Florida Commission on Human Resources in conducting annual workshops on fair housing, reviewing local comprehensive land use plans and amendments to ensure these plans address

the housing needs of all the residents of the community, requiring certain grant recipients to conduct quarterly fair housing activities and having a local fair housing coordinator to address complaints.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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 choice. Some specific examples of recommendations to help eliminate barriers to affordable housing include:

- publishing fair housing resource materials on agency websites in different languages,
- 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,
- having a local fair housing coordinator to address complaints.

## **SP-60 Homelessness Strategy – 91.315(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Emergency Solutions Grant program is the only one of the four 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 State ESG program administrators rely on the twenty-eight CoC 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 counts. Point-in-time counts can be carried out in two ways: the survey method, or the in-person interview method. In some cases, the CoC agency will send out surveys to their shelter services providers to collect data regarding the number of sheltered homeless individuals on any given night. In other cases, the CoC 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 any given night.

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

Much like the outreach strategies described in the previous paragraph above, the State ESG Program relies on the twenty-eight CoC agencies and their homeless service providers to provide the numbers and reasons for their 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 jurisdictions that promote self-sufficiency and access to more permanent housing options.

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

The CoC agencies within Florida implement a variety of programs that provide services to very specific segments of the homeless populations including chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The state ESG Program provides program funds directly to CoC agency service providers 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. 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.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

There are a number of private non-profit 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.

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

## **SP-65 Lead based paint Hazards – 91.315(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

Florida recognizes the relationship between health and lead poisoning, especially the risk it poses to children. The Florida Department of Health Website provides a list of ways to prevent lead-based paint exposure, they include:

- 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 renovation in housing built before 1978, and
- if considering renovation or repair work on a pre-1978 home, be sure to follow the EPA Lead-Safe Guide to Renovate Right.

The Florida Department of Health 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 Florida Small Cities CDBG and the HOME program requires all applications for housing rehabilitation projects to determine the age of the house. Any home that was constructed before January 1, 1978, must be tested for lead based paint and appropriate measure undertaken to safely remove and dispose of the paint in accordance with HUD requirements.

### **How are the actions listed above integrated into housing policies and procedures?**

The Department of Health will focus on the following activities to prevent and address healthy homes throughout Florida:

- facilitate quarterly meetings of the Florida Healthy Homes Collaborative to coordinate public and private efforts to reduce lead-based paint hazards and promote healthy housing,
- maintain a collaborative comprised of representatives from federal, state and local housing agencies, community groups, and industries involved in lead poisoning and healthy housing issues,
- conduct a healthy housing needs assessment,
- assess state and local capacity for reducing lead hazards,



- establish a strategic plan to address needs through capacity development and targeted interventions, and
- coordinate and provide direction to stakeholders involved in prevention efforts through bi-annual meetings.
- *Integrate lead hazard evaluation and reduction activities into existing housing programs, and incorporate checks to assure compliance with federal and state lead-safe work practice and lead poisoning prevention regulations.*
- Educate and meet with government-assisted housing rehabilitation providers to discuss integrating activities to identify and reduce lead hazards into all housing rehabilitation activities;
- Provide the "Addressing Lead-Based Paint in Federally-Funded Housing" training to managers of federal, state and local housing monies in Florida,
- Create a universal home assessment tool that can be used by home visitors and housing professionals to assess key housing and health needs (weatherization can ask if there are children less than six years of age in the homes and if they are in need of a blood lead test, provide educational materials, etc);
- Implement documentation and monitoring processes to assure compliance with federal policies, including Title X Family Planning Program and the Renovation, Repair and Paint rule; and
- Ensure maintenance and renovation staff working on state and federally funded projects are properly training and certified on lead safe work practices as a condition of contract award, including RRP training and HUD interim controls training where appropriate.
- Intergrate lead hazard evaluation and reduction activites into existing housing programs, and incorporate checks to assure compliance with federal and state lead-safe work practice and lead poisoning prevention regulation.

**SP-70 Anti-Poverty Strategy – 91.315(j)**

**Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

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

**How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

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

## SP-80 Monitoring – 91.330

**Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

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

Substantial Amendment for NHTF:

FHFC must perform onsite inspections of each NHTF - assisted project at completion, per § 93.404(d). For rental housing, the property must be inspected during the period of affordability to determine that the housing complies with the applicable property standards. Because NHTF funding will be layered with other affordable rental financing, additional more stringent monitoring requirements may also be required. The provisions below are required per NHTF regulations:

- The onsite inspections must occur 12 months after project completion and at least once every three years thereafter during the period of affordability;
- If there are observed deficiencies for any inspected items, a follow-up onsite inspection must occur within 12 months or other reasonable timeframe established by grantee;
- Life-threatening health and safety deficiencies must be corrected immediately;
- On an annual basis, the property owner must certify to the grantee that each building is suitable for occupancy;
- Inspections must be based on a statistically valid sample of units appropriate for the size of the HTF-assisted project; and
- The grantee must verify the information submitted by project owners.

## Expected Resources

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

#### Introduction

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

#### Substantial Amendment for NHTF:

For fiscal year 2016, the state NHTF Program will receive a total allocation of \$4,598,821. All of this funding (minus 10 percent for administration) will be reserved for applicants that commit to set aside a small portion of units in their developments to serve households with incomes at approximately 22 percent of area median and that are homeless, at risk of homelessness, or include an adult person with a special need. Funding will be made available in tandem with other affordable rental financing through one or more competitive Requests for application that are based on state and federal requirements, including the NHTF program regulations.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	24,019,316	43,491	1,421,063	25,483,870	87,507,555	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
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	12,251,406	7,053,243	6,890,927	26,195,576	70,327,669	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR92

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	3,357,058	0	7,450,153	10,807,211	14,450,734	The annual allocation and any program income or prior year resources will be allocated to eligible HOPWA categories per 24 CFR 574
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,019,268	0	1,052,813	6,072,081	18,127,919	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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund	public - federal	Other	4,598,821	0	0	4,598,821	13,796,463	The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93.

Table 438 - 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.

Substantial Amendment for NHTF:

National Housing Trust Fund - Provides funds to developers of affordable rental housing that construct new housing for extremely low income households. This funding can assist FHFC in creating financing opportunities with some or all of the programs listed here to enable assisted units to serve lower income residents than could be done by each program separately.

**If appropriate, describe publically 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 Small Cities 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 2015-2020. 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	2020	Non-Housing Community Development	STATEWIDE	Job Creation	CDBG: \$6,869,899	Jobs created/retained: 100 Jobs
2	Commercial Revitalization	2015	2020	Non-Housing Community Development	STATEWIDE	Job Creation	CDBG: \$1,491,485	Facade treatment/business building rehabilitation: 5 Business
3	Housing Rehabilitation	2015	2020	Affordable Housing	STATEWIDE	Affordable Ownership Housing	CDBG: \$5,649,564	Homeowner Housing Rehabilitated: 120 Household Housing Unit
4	Neighborhood Revitalization	2015	2020	Non-Housing Community Development	STATEWIDE	Flood and Drainage Sewer Line Improvements Street Improvements Water Line Improvements	CDBG: \$8,587,337	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 34000 Persons Assisted
5	Street Outreach	2015	2020	Homeless	STATEWIDE	Street Outreach to Homeless Persons	ESG: \$240,000	Homelessness Prevention: 20 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Emergency Shelter and Transitional Housng	2015	2020	Homeless	STATEWIDE	Emergency Shelters and Transitional Housing	ESG: \$1,700,000	Other: 21 Other
7	Permanent Housing for Homeless Persons	2015	2020	Affordable Housing	STATEWIDE	Homeless Prevention	ESG: \$2,900,000	Housing for Homeless added: 37 Household Housing Unit
8	Rental and Homeownership Activities (CHDOs)	2015	2020	Affordable Housing	STATEWIDE	Affordable Ownership Housing Affordable Rental Housing	HOME: \$1,837,711	Rental units constructed: 40 Household Housing Unit
9	Affordable Rental Housing	2015	2020	Affordable Housing	STATEWIDE	Affordable Rental Housing	HOME: \$8,733,469	Rental units constructed: 210 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted
10	Affordable Homeownership Housing	2015	2020	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$8,733,469	Direct Financial Assistance to Homebuyers: 50 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Housing and Supportive Services	2015	2020	Affordable Housing Non-Homeless Special Needs	STATEWIDE	Housing Placement Assistance Short Term Rent, Mortgage and Utility Payments Short Term Supported Housing Facility Assistance Supportive Services Tenant Based Rental Assistance	HOPWA: \$5,051,589	Tenant-based rental assistance / Rapid Rehousing: 857 Households Assisted HIV/AIDS Housing Operations: 62 Household Housing Unit Other: 4945 Other

Table 449 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated approximately 30.40 percent of the total Fiscal Year 2015 CDBG 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	<b>Goal Name</b>	Commercial Revitalization
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated approximately 6.6 percent of the total Fiscal Year 2015 CDBG allocation to the Commercial Revitalization category 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.

3	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 25 percent of the total Fiscal Year 2015 CDBG allocation 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	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	The Department of Economic Opportunity has allocated 38 percent of the total Fiscal Year 2015 CDBG allocation to the Neighborhood Revitalization category 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.
5	<b>Goal Name</b>	Street Outreach
	<b>Goal Description</b>	The ESG program has allocated over \$240,000 from the 2015 annual funding allocation to fund local street outreach programs. The programs 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 through Florida.
6	<b>Goal Name</b>	Emergency Shelter and Transitional Housing
	<b>Goal Description</b>	The ESG program has allocated \$1,700,000 from the 2015 annual allocation to fund emergency shelter facilities. This funding will enable the Department to provide emergency shelter for approximately 21 shelter facilities, including domestic violence facilities, throughout the state.
7	<b>Goal Name</b>	Permanent Housing for Homeless Persons
	<b>Goal Description</b>	The ESG program allocated \$2,900,000 from the 2015 annual allocation to fund homelessness prevention and rapid re-housing activities. Based on past funding models, the Department expects to fund approximately 37 housing providers throughout Florida.
8	<b>Goal Name</b>	Rental and Homeownership Activities (CHDOs)
	<b>Goal Description</b>	The HOME program has allocated \$1,837,711 from the 2015 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.

<b>9</b>	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	The HOME program has allocated \$8,733,469 from the 2015 annual funding allocation and program income and de-obligated funding to fund affordable rental housing through a Request for Application (RFA) process or demonstration. Funding can be used for activities such as construction, rehabilitation, and rental assistance for extremely low, very low and low- and moderate-income households.
<b>10</b>	<b>Goal Name</b>	Affordable Homeownership Housing
	<b>Goal Description</b>	The HOME program has allocated \$8,733,469 from the 2015 annual funding allocation and program income and de-obligated funding to fund affordable homeownership housing either through a Request for Application (RFA) process or reservation system. Funding can be used for homebuyer assistance activities, such as down payment assistance and construction and rehabilitation activities for homeownership.
<b>11</b>	<b>Goal Name</b>	Housing and Supportive Services
	<b>Goal Description</b>	The HOPWA program has allocated \$5,051,589 of the 2015 Annual Allocation to fund activities, carried out by the 11 certified projects sponsors throughout Florida, including financial assistance in the form of short-term rent, mortgage and utility payments, short-term supported housing facility assistance for operation and maintenance, supportive housing services (i.e., counseling and healthcare services), and tenant-based rental assistance for persons with HIV/AIDS.

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The following chart reflects the planned percentage distribution of the FFY 2015 Small Cities CDBG program, ESG program, HOME program, and the HOPWA program. Also included in this section is a description for 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

	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) (%)	Affordable Rental Housing (%)	Affordable Homeownership Housing (%)	Housing and Supportive Services (%)	Total (%)
CDBG	30	7	25	38	0	0	0	0	0	0	0	100
HOME	0	0	0	0	0	0	0	15	42	43	0	100
HOPWA	0	0	0	0	0	0	0	0	0	0	100	100
ESG	0	0	0	0	6	35	59	0	0	0	0	100
Housing Trust Fund	0	0	0	0	0	0	0	0	100	0	0	100

Table 60 – Funding Allocation Priorities

### Reason for Allocation Priorities

The percentages, described in Table 60 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 2015-2020 Consolidated Plan. For the Small Cities 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 the funds in that category may be reallocated to another category receiving more applications than there are funds available. Also, 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 2015-2020 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 based on applications received in the past.

**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.

Substantial Amendment for NHTF:

The NHTF Program will address one primary objective with its FFY 2016 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-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

This section of the FFY 2015 Annual Action Plan describes how each annual allocation of Small Cities CDBG, ESG, HOME, NHTE, and HOPWA program funds will be distributed geographically throughout Florida.

### Distribution Methods

**Table 451 - Distribution Methods by State Program**

<b>1</b>	<b>State Program Name:</b>	Florida Emergency Solutions Grant Program
	<b>Funding Sources:</b>	ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	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 non-profit 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 can establish additional eligibility criteria for program beneficiaries in accordance with 24 CFR 576.400 (e). All local government and non-profit recipients must consult with the CoC Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.



<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>To evaluate the applications, the Department of Children and Families will designate three (3) persons knowledgeable in the program area, which may include employees of other state agencies or entities to serve as grant evaluators. The evaluators will be selected that do not have a conflict of interest with potential applicants. The evaluators will assess the applicants' responses to the Agency Profile, Proposed Activities and CoC Certification. Each response is given appoint value, based on complexity of the question.</p> <p>For questions with a maximum point value of one or two points, the full amount of points must be given if the answer is complete and clear. For questions with a maximum value of five points, the scoring criteria chart below will be used for guidance. The five point questions must be awarded a score between 0-5. Sections of the application that are incomplete or no response given (the response is missing, incomplete, or unclear), will receive a score of 0 points. Sections of the application with acceptable responses (the response is included and provides a description of the questions asked, but sufficient details may be lacking) will receive a score of three points. Sections of the applications that are excellent responses (the response is included and provides a clear, well-defined description and analysis of the question asked) will receive a score of five points (maximum score). The DCF will award grant amounts based on an evaluation until all grant funds are awarded. In the event of two or more applicants with the same evaluation outcomes, DCF may consider the past performance of the applicant under the previous ESG. Additionally, DCF may consider other factors, including but not limited to, the proposed project and how it relates to serving the best interest of the state in sheltering homeless persons, preventing families and individuals from becoming homeless or providing needs of homeless persons through street outreach services. For those applicants who were not funded previously with the ESG, DCF may consider how the proposed program will benefit the state and those persons DCF has a priority to serve.</p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable</p>
<p><b>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)</b></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 subgrants the ESG funds to units of general purpose local government and/or non-profit 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 can establish additional eligibility criteria for program beneficiaries in accordance with 24 CFR 576.400 (e). All local government and non-profit recipients must consult with the CoC Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable</p>

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>In 2015, the State ESG Program may receive a total allocation of \$5,019,268 in funding for fiscal year 2015. Of the total funding allocation, \$1,700,000 will be spent on Emergency Shelters, \$240,000 will be spent on Street Outreach activities, \$2,900,000 will be allocated to Homeless Prevention Services and Rapid Re-Housing activities, and \$345,000 will be spent on Administrative activities. The types of service providers that will be funded include are: Homeless Prevention Grants direct to families at risk of homelessness, local level homeless coalitions for data collection and coordination with the twenty-eight CoC agencies, the Council and Office on Homelessness for policy development and state agencies coordination, and Challenge Grants to the twenty-eight CoCs throughout the state to fund any of the housing, program, or service needs included within their CoC plan.</p>						
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The maximum award amount for Emergency Shelter projects is \$75,000 with a maximum 5 percent administration budget for a total maximum award of \$78,750. The maximum award amount for Homeless Prevention/Rapid Re-housing projects is \$75,000 with a maximum 5 percent Administration budget for a total maximum award of \$78,750. The maximum award amount for Street Outreach projects is \$47,032 with a maximum 5 percent Administration budget for a total maximum award of \$49,507.</p>						
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></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, and how many homeless persons received permanent housing.</p>						
<p>2</p>	<table border="1"> <tr> <td data-bbox="233 1029 630 1088"> <p><b>State Program Name:</b></p> </td> <td data-bbox="630 1029 1906 1088"> <p>Florida HOME Investment Partnership Program</p> </td> </tr> <tr> <td data-bbox="233 1088 630 1146"> <p><b>Funding Sources:</b></p> </td> <td data-bbox="630 1088 1906 1146"> <p>HOME</p> </td> </tr> <tr> <td data-bbox="233 1146 630 1403"> <p><b>Describe the state program addressed by the Method of Distribution.</b></p> </td> <td data-bbox="630 1146 1906 1403"> <p>HOME 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. The Florida Housing Finance Corporation (FHFC) works with both the public and private sector throughout the state to assist in meeting the needs of affordable housing in rural areas. The FHFC distributes HOME funds either through a Request for Applications process, a reservation system or a demonstration project.</p> </td> </tr> </table>	<p><b>State Program Name:</b></p>	<p>Florida HOME Investment Partnership Program</p>	<p><b>Funding Sources:</b></p>	<p>HOME</p>	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>HOME 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. The Florida Housing Finance Corporation (FHFC) works with both the public and private sector throughout the state to assist in meeting the needs of affordable housing in rural areas. The FHFC distributes HOME funds either through a Request for Applications process, a reservation system or a demonstration project.</p>
<p><b>State Program Name:</b></p>	<p>Florida HOME Investment Partnership Program</p>						
<p><b>Funding Sources:</b></p>	<p>HOME</p>						
<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>HOME 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. The Florida Housing Finance Corporation (FHFC) works with both the public and private sector throughout the state to assist in meeting the needs of affordable housing in rural areas. The FHFC distributes HOME funds either through a Request for Applications process, a reservation system or a demonstration project.</p>						

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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, larger scale rental development priority projects scoring criteria would be based on level of experience of the applicant with implementation of HOME funds and Davis-Bacon federal requirements and 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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable</p>
<p><b>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)</b></p>	<p>Not applicable</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>In 2015, the HOME Program may receive a total allocation of \$12,251,406 in funding for fiscal year 2015. Of the total funding allocation, \$1,837,711 will be reserved for development that are sponsored by qualified Community Housing Development Organization (CHDO) applicants. FHFC has historically exceeded the 15 percent CHDO requirement between rental and homeownership activities. In the event insufficient applications meeting threshold are received to allocate this amount to rental developments, the remaining unallocated funds (including CHDO reservation amount) 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 or through direct homebuyer assistance. \$1.2 million of the total annual allocation will be used by FHFC for administrative costs pursuant to 24 CFR 92.207.</p>
<p><b>Describe threshold factors and grant size limits.</b></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 type of priority criteria scoring determined by FHFC HOME program staff. During the fiscal year 2014 allocation distribution cycle, FHFC conducted two separate RFA processes, one for large scale rental development projects including bonding, and one for smaller scale rural area driven homeownership housing projects. The maximum grant size limits for the larger scale rental development projects including bonding is typically set at \$5.0 million, while the smaller scale projects for homeownership housing projects is typically set at a maximum of \$80,0000 per application submission.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	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 2015, it is expected that the HOME program will finance construction or rehabilitation of 250 rental housing units and 500 households will receive rental assistance for affordable rental housing and 50 new homeowners will receive purchase assistance.
<b>3</b>	<b>State Program Name:</b>	Florida Housing Opportunities for Persons with AIDS Grant Program
	<b>Funding Sources:</b>	HOPWA

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The Florida Department of Health currently contracts with eleven project sponsors to administer the HOPWA Program in designated geographic areas, the majority of which are rural. Ten of Florida’s fourteen Ryan White Part B consortia/planning bodies provide recommendations for needs assessments, planning, and prioritization for state HOPWA funds. The five-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 sixteen counties.</p> <p>The current project sponsors for HOPWA funds and the counties that are served are listed below:</p> <ul style="list-style-type: none"> <li>• Area 1: Lutheran Services Florida, Inc. Northwest (Escambia, Okaloosa, Santa Rosa, and Walton Counties)</li> <li>• Area 2A: Basic NWFL Inc. (Bay, Calhoun, Gulf, Holmes, Jackson, Washington Counties)</li> <li>• Area 2B: Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, and Wakulla Counties)</li> <li>• Area 3/13: WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee, and Union Counties)</li> <li>• Area 6: Hillsborough County Health Department (Manatee County)</li> <li>• Area 7: United Way of Brevard County, Inc. (Brevard County)</li> <li>• Area 11B: Monroe County Health Department (Monroe County)</li> <li>• Area 12: Health Planning Council of Northeast Florida, Inc. (Flagler and Volusia Counties)</li> <li>• Area 14: Polk County Health Department (Highlands, Hardee and Polk Counties)</li> <li>• Area 15: St. Lucie County Health Department (Indian River, Martin, Okeechobee, and St. Lucie Counties)</li> </ul>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The priority of applications are 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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable</p>
<p><b>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)</b></p>	<p>Not applicable</p>



<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Florida distributes funds annually based on the cumulative number of reported living HIV and AIDS cases in ten geographical service areas through December 31, 2014. The allocation is based on each area's proportionate share of the cumulative number of living HIV and AIDS cases, utilization rates, and available funds. The allocation methodology is reviewed periodically, and the FDOH takes recommendations into account prior to making final annual allocation decisions. EMSAs of 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>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, the FDOH drafted a Request for Proposal consisting of a four year contract cycle. For the first HOPWA fiscal year (2012-2013), contracts were only for a 9 month period starting on October 1, 2012; for the remaining three years, contracts will be for the full 12 months. Funds were allocated within each geographical area in accordance with the methodology described. Approximately \$5,051,589 (97 percent) of the FFY 2015 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 the FDOH in the same manner and for the same activities as the state HOPWA program.</p> <p>In advance of the 2016-17 cycle, the FDOH will draft a new Request for Proposal consisting of a four year contract cycle. The proposals submitted and awarded will determine the project sponsors for the 2016-2020 time frame. The state program currently has two faith-based organizations, six community-based organizations, and three planning councils providing either direct services or via sub-contract.</p>
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	<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>In 2015, the HOPWA program may receive a total allocation of \$3,357,058 in funding for fiscal year 2015. Of the total funding allocation, \$3,256,346 or 97 percent of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent 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 three percent of the funding will be spent on administrative activities carried out by the Florida Department of Health.</p>
	<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The HOPWA program does not require specific thresholds 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 twelve authorized 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 submittal and amount of funding available to be distributed state-wide.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></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 projects sponsors in the form of rent, mortgage, and utility payments, or tenant-based rental assistance, and other eligible public services including healthcare and counseling.</p>
<p><b>4</b></p>	<p><b>State Program Name:</b></p>	<p>Florida Small Cities Community Development Block Grant Program</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The Florida Department of Economic Opportunity receives an annual allocation from the U.S. Department of Housing and Urban Development to administer the Small Cities Community Development Block Grant (CDBG) Program. The Department 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 Small Cities CDBG funding by category and the opening and closing date of the funding cycle.</p> <p>When the Department 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. A committee made up of the director of the Division of Community Development, the Community Revitalization Bureau Chief, and the planning managers for the Small Cities and Operations units review the recommendations and adopt a funding distribution plan for the funding cycle. 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 fiscal year. When funds become available, the same committee that adopts the funding distribution plan for the annual action plan meets to determine how to allocate these funds. The funds can be used to award the highest ranking applications that did not receive funding during the current cycle, planning grants that have successfully completed the design phase and are ready to enter the construction phase, or economic development projects on the funding reservation list. If Emergency Set-Aside funds become available on April 1 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 Small Cities 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><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The funding categories for the Florida Small Cities CDBG Program are established by state law. The percentage of funds allocated for each category are determined based on public meetings and 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 the Department of Economic Opportunity may reject an application without regard to scoring:</p> <ol style="list-style-type: none"> <li>1. the application is not received by the specified deadline date.</li> <li>2. the proposed project activities fail to meet one of the three national objectives contained in federal and state legislation,</li> <li>3. the proposed activities are not eligible under federal legislation,</li> <li>4. the proposed activities are not in compliance with the adopted local comprehensive plan, as approved by the DEO,</li> <li>5. the applicant has an open community development block grant, except as provided in s. 290.046(2)(c), F.S.,</li> <li>6. the local government is not in compliance with citizen participation requirements.</li> <li>7. information provided in the application that affects eligibility or scoring is misrepresented.</li> </ol> <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, based upon a site visit, the DEO determines that any information in the application that affects scoring has been misrepresented, the application is rejected.</p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The Small Cities program is established in state statutes in Sections 290.0401 through 290.048, Florida Statutes, and administered through Chapter 73C-23, Florida Administrative Code. 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 Small Cities 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 Small Cities CDBG website. Information to be included in the application can be found on the U.S. Department of Housing and Urban Development website, the Small Cities CDBG website, and generated during the application process.</p>
<p><b>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)</b></p>	<p>Not applicable</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Funding amounts are assigned to each funding category based on need evaluation. For the FFY 2015 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 fiscal year. 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 priorities needs and goals from the Needs Assessment and Market Analysis sections of the 2015-2020 Consolidated Plan.</p>
<p><b>Describe threshold factors and grant size limits.</b></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> <ul style="list-style-type: none"> <li>• LMI Population Subgrant Ceiling:</li> <li>• 1 – 499: \$600,000 500 – 1,249: \$650,000 1,250 – 3,999: \$700,000 4,000 – and above: \$750,000</li> </ul> <p>Planning and Design Specifications subgrants: \$70,000.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	The anticipated outcome measures for the Small Cities CDBG program are based on the number and type of applications received from eligible subgrantees 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, the number of low- to moderate- income beneficiaries, and number of jobs created or retained.
5	<b>State Program Name:</b>	National Housing Trust Fund Program
	<b>Funding Sources:</b>	Housing Trust Fund
	<b>Describe the state program addressed by the Method of Distribution.</b>	<u>NHTF 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.</u>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p><u>The criteria listed below have all been deemed of equal relative importance; that is, if an applicant does not meet these criteria, they will not receive funding.</u></p> <ul style="list-style-type: none"> <li>• <u>The development must be permanent rental housing and each NHTF-designated unit may have no more than two bedrooms;</u></li> <li>• <u>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 as a whole must remain affordable at designated income levels for a minimum of 30 years;</u></li> <li>• <u>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;</u></li> <li>• <u>The applicant must show via its developer experience its ability to obligate NHTF funds and undertake eligible activities in a timely manner;</u></li> <li>• <u>The provision of a description of the eligible activities to be conducted with the NHTF funds;</u></li> <li>• <u>The extent to which the application makes use of non-federal funding sources;</u></li> <li>• <u>The extent to which a proposed development has federal, state or local project based rental assistance.</u></li> <li>• <u>Certification must be made to FHFC that applicant will comply with the requirements of the NHTF program and that housing units assisted with the NHTF will comply with NHTF requirements;</u></li> <li>• <u>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; and</u></li> <li>• <u>Commit 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;</u></li> <li>• <u>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;</u></li> <li>• <u>Commit to meeting specified green building and accessibility standards; and</u></li> </ul>
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	<ul style="list-style-type: none"> <li>Propose developments in locations that are proximate to public transportation options and amenities such as grocery stores and pharmacies.</li> </ul>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable.</p>
<p><b>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)</b></p>	<p>Not applicable.</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p><u>Ninety percent of the \$4,598,821 NHTF allocation will be used to finance affordable rental units for extremely low income households, and ten percent of the allocation will be used by FHFC for administrative costs pursuant to § 93.202.</u></p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p><u>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.</u></p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p><u>In 2016, it is expected that the NHTF program will assist in financing construction of 16 affordable rental units to serve extremely low-income residents.</u></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 Small Cities 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 formula grant method where eligible homeless services providers work in collaboration with the 28 CoC agencies throughout the state. The HOME program bases allocation distribution on awards to high performing CHDOs eligible to receive direct funding from the program to carry out eligible program activities and a application process where award determinations are based on the quality of the application submission and the amount of the request from eligible local governments and housing provider organizations. The HOPWA program bases allocation distribution on the amount of funding available and the location of the 12 authorized project sponsors who receive direct funding from the program to carry out eligible program activities. 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.

## AP-35 Projects – (Optional)

### Introduction:

Florida Small Cities 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, as long as 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 [non-profits, for-profit developers, local governments, public housing authorities and Community Housing Development Organizations (CHDOs)] are encouraged to apply for HOME funding. Three primary criteria applicants must demonstrate are: (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, 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 both CHDO and other developments depending on the ranking.

HOME funds for Homeownership falls under 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 non-profit and for-profit organizations, Community Housing Development Organizations (CHDOs), counties and eligible municipalities that are recipients of SHIP funding 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.

NHTF developments will be selected through a statewide, Request for Application process. Eligible applicants (including non-profit 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 offer financing only 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.

#	Project Name

Table 462 – Project Information

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

**AP-38 Project Summary**  
**Project Summary Information**

**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 \$5.0 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.

#### Substantial Amendment for NHTF:

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 Florida Housing Finance Corporation’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 Requests for Applications 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 3-5 years.

#### Geographic Distribution

Target Area	Percentage of Funds
STATEWIDE	

Table 473 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

Of the four HUD funded programs described in this 2015 Annual Action Plan that bases allocation distribution on geographical factors is the HOPWA program. The geographical distribution method is simply based on the location of the twelve authorized project sponsors who serve specific counties and jurisdictions within their geographical area range. The twelve authorized project sponsors generally serve two to five counties and all jurisdictions within the counties based on need level and availability of funding.

The proposed approach to allocating NHTF funds will respond to rental needs studies carried out for and by FHFC on a regular basis. While additional data is evaluated, the foundation of these studies is a detailed review of cost burden information – that is, evaluating by county how many renters at various incomes and by demographic groups are paying more than 30 percent of their income for their housing and utilities.

#### Discussion

## Affordable Housing

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

**Introduction:**

All five of the federal funded grant programs, CDBG, HOME, ESG, NHTF, and HOPWA, described in the 2015-2020 Consolidated Plan 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 provided transitional and rapid re-housing activities to the homeless segment of the population. The HOPWA programs supports affordable housing by providing housing opportunities to persons with HIV/AIDS. The HOME, ESG and HOPWA programs all set affordable housing goals to achieve each federal fiscal years, but the CDBG Program bases their accomplishments on the amount 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.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	70
Non-Homeless	0
Special-Needs	34
Total	104

**Table 48 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	366
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	366

**Table 49 - 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 apparent need documented state-wide 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 2015-2020 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 Small Cities CDBG, ESG, and HOPWA programs do not allocation direct funding to Public Housing Agencies (PHAs), nor are they eligible to support competitive applications to request funding from any of the programs. Florida Housing Finance Corporation 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**

According to the State of Florida 2011-2015 Consolidated Plan, there were nine PHAs assigned a troubled designation according to regulations defined by 24 CFR part 902. The HUD provided a special allocation of grant funds to complete improvements to correct substandard housing problems discovered during a monitoring visit by field agents from the HUD Office of Public and Indian Housing. As

of 2013, only one of the nine PHAs on the listed provided in 2010 was still designated as troubled. However, as of June 2013, there were three PHAs who had received troubled designations between 2011 and 2013.

The three PHAs, designated as troubled, are still able to receive funding allocations from HUD, but are subject to frequent auditing and assistance from the HUD Office of Public and Indian Housing and must submit progress reports on a scheduled timeline. With the enhanced monitoring and an opportunity for staffing increases, management and operation improvements can be achieved faster and short and long term goals can be created in order to maintain successful practices and have the troubled designated removed.

**Discussion:**

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

### **Introduction**

The Department of Children and Families, 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. The Florida Department of Health, through the HOPWA Program, provides funding for housing opportunities for persons with HIV/AIDS. 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 services providers to seek these tenants. These three federal funding programs described in the 2015-2020 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 Emergency Solutions Grant (ESG) program is the only one of the four 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 state ESG program administrators rely on the twenty-eight CoC 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 counts. Point-in-time counts can be carried out in two ways; the survey method, or the in-person interview method. In some cases, the CoC agency will send out surveys to their shelter services providers to collect data regarding the number of sheltered homeless individuals on any given night. In other cases, the CoC 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 any given night.

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

The state will allocate forty percent (44%) of the annual grant award to the emergency shelter component, which will fund local providers of emergency housing. Based on past funding, the Department expects to fund the operation of over twenty-eight (28) facilities in 2015.

Other transitional housing projects will be up for renewal grants in the CoC NOFA's for 2015. Such housing units are critical to the homeless service plans, as transitional housing beds (13,540) 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 over \$31 million in state and federal grants to support forty-two (42) domestic violence centers, providing over 39,000 emergency shelter nights of care. State revenue sources provide over \$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 previous paragraph above, the ESG Program relies on the twenty-eight CoC agencies and their homeless service providers to provide the numbers and reasons for their 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 jurisdictions 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 very 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 agency service providers 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. 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 to 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 non-profit 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 instead help them to achieve self-sufficiency. In regards to the State of Florida's efforts to assist in funding strategies and initiatives for this particular segment of the population, the Florida Department of Children and Families works with public housing authorities and other housing and supportive housing services to identify the at-risk of homelessness population (extremely low-income or zero-negative income) and monitor their need for public services such as sufficient housing, healthcare, social services, employment, education or youth needs.

## **Discussion**

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	10
Tenant-based rental assistance	10
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	10
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	10
<b>Total</b>	<b>40</b>



## **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 the *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 help eliminate the potential barriers identified. In developing the *Analysis to Impediments* report, the State of Florida conducted ten 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 were affecting 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 have an effect on fair housing choice.

One conclusion from the review of the Florida statutes, regulations, and policies, is that the Chapter 163, Part II, F.S., Florida Community Planning Act (Sections 163.3161 - 163.3217, F.S.) and Chapter 760, Part II, F.S., Florida Fair Housing Act (Sections 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 choice. Some specific examples of recommendations to help eliminate barriers to affordable housing include:

- 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,
- having a local fair housing coordinator to address complaints.

### **Discussion:**

## **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**

The Small Cities CDBG program serves the needs of its subgrantees through the grants it awards. Applications that are submitted by these local governments are based comments received at a local public hearing that allows citizens to identify their priority community needs and submit eligible projects for funding consideration.

The Florida Department of Health (FDOH), whom administers the HOPWA program, will remain involved in board activities of the Florida Supportive Housing Coalition. The Coalition and FDOH are committed to creating long-term housing solutions for people with special needs, including persons living with HIV/AIDS in Florida. 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 member that includes the coalition board, members of multiple statewide partner coalitions, and representatives from various state agencies, including the FDOH, will continue to convene.

The Florida Department of Children and Families (DCF), whom administers the ESG program, collaborates directly with Florida's 28 CoC agencies in order to identify areas with high concentrations of underserved homeless populations and use the information collected to update and implement strategies to overcome any obstacles identified. The ESG program provides direct funding to the 28 CoC agencies in the categories of emergency shelter and transitional housing activities, street outreach activities, and Homeless Prevention Services. The CoC 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.

Florida Housing Finance Corporation also serves on the State 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 State Catalyst Program provides training and technical assistance on federal and state affordable housing programs, including HOME. FHFC contracts with a nonprofit provider for this service. The Predevelopment Loan Program provides revolving loan funds to emerging nonprofits wanting to get into housing development, as well as PHAs interested in housing development and redevelopment. The program provides predevelopment loan funding to get a

project started, as well as technical assistance at no cost to the organization.

### **Actions planned to foster and maintain affordable housing**

The Small Cities 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 State 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, Florida Housing Finance Corporation uses a variety of other resources to provide affordable housing financing.

The goal of the State 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 housing units provided. In this 2015 Annual Action, the HOPWA program anticipates to serve 4,945 beneficiaries with housing and supportive services with the intention of fostering and maintaining affordable housing.

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

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

The Florida Department of Health Website provides a list of ways to prevent lead-based paint exposure, they include:

- 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 renovation in housing built before 1978, and
- if considering renovation or repair work on a pre-1978 home, follow the EPA Lead-Safe Guide to Renovate Right.

The Florida Department of Health 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 Florida Small Cities CDBG program requires all applications for housing rehabilitation projects to determine the age of the house. Any home that was constructed before January 1, 1978, must be tested for lead base paint and appropriate measure undertaken 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 financing 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 funding will also be required to implement this approach, with the addition of those at risk of homelessness being able to be served. Florida Housing Finance Corporation is working with other state agencies to implement this strategy.

**Discussion:**

## Program Specific Requirements

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

#### Introduction:

The Small Cities CDBG program anticipates receiving \$43,491 in program income this year. The program will not receive any proceeds from Section 108 loan guarantees, there are urban renewal settlements, no grant funds returned to the line of credit, and there are float-funded activities.

No urgent need activities are anticipated. 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	43,491
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
<b>Total Program Income:</b>	<b>43,491</b>

#### 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.

**Discussion:**

## Attachments



## Citizen Participation Comments

### Appendix 1.A. Summary of Public Comments Received

#### 1. Summary of Public Comments

- **February 24, 2016 workshop**
  - The affordability period should be 50 years.
  - Geographic distribution should be a priority. (Provided in Plan at p. 12).
  - National Housing Trust Fund (NHTF) resources should be used to serve persons with special needs. (Provided in Plan at p. 4-5 and 12).
  - NHTF resources should be used to serve persons with incomes at the level of Supplemental Security Income (SSI). (Provided in Plan at p. 4-5 and 12).
  - NHTF resources should be used to serve homeless persons. (Provided in Plan at p. 4-5 and 12).
  - The housing should be paired with other services. (Provided in Plan at p. 6 and 20).
- **April 28, 2016 workshop**
  - Recipients should be required to hold units open for ELI households. (Provided in Plan at p. 6).
  - Fund as many new construction units as possible. (Provided in Plan at p. 7).
  - Focus on the working poor.
  - Require the longest affordability period possible. (Provided in Plan at p. 6 and 20).
  - Consider funding properties already in the Florida Housing pipeline.
- **July 28, 2016 Public Hearing**
  - No comments received.
- **Written Comments Submitted to Florida Housing**
  - Finance housing for ELI individuals with special needs, particularly individuals with mental health conditions.
  - Not only target funding to persons with special needs, but prioritize persons with mental illness.
  - Ensure long term compliance. (Provided in Plan at p. 6 and 20).
  - Limit awards to not-for-profit recipients.
  - Target persons at or below SSI income levels. (Provided in Plan at p. 4-5 and 12).
  - Require a 50 year affordability period.
  - Require leveraging of other sources but do not require that these sources be available at the time of application.

- Require strong tenant protections and prohibit excessive tenant application fees, large security deposits, and unreasonable criminal background checks in NHTF financed properties.
- Require a high percentage of the funded units to be 1-bedroom.
- Do not prioritize properties receiving rental assistance.
- Use NHTF to finance acquisition and rehabilitation, not just new construction.
- Require that NHTF units be provided in addition to other Florida ELI units required by Florida Housing. (Provided in Plan at p. 5).
- The 30 year affordability period is unreasonable and will make compliance monitoring difficult.

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

All the comments received were considered in development of the proposed NHTF Allocation Plan. Some suggestions were not incorporated into the Plan.

- Several commenters proposed that Florida Housing require a 50 year affordability period for NHTF financed properties. The minimum affordability period for NHTF is 30 years. Florida Housing will not require additional years of affordability at the ELI level because rents will not cover property operating costs without additional subsidy.
- One commenter urged Florida Housing to target NHTF assisted units to the working poor. Although individuals and households identifiable as working poor will likely be among those served by NHTF, the target will not specifically be the working poor. Many other households who may be considered working poor have incomes above the NHTF maximum income level of 30% of ELI.
- One commenter suggested Florida Housing use its first allocation of NHTF to add units affordable to ELI households to properties which have already received an award of Low Income Housing Tax Credits, but have not yet been placed in service. This would allow Florida Housing to quickly add deeply-targeted units to the inventory of available housing. With the exception of some architectural and engineering expenses, the NHTF Interim Rule does not allow grantees to fund development costs undertaken before NHTF funds are committed to the property. In most cases, properties which have received financing awards will already have incurred substantial expenses by the time a 2016 NHTF award could be made.
- Several commenters recommended limiting eligibility to receive NHTF funds to not-for-profit entities. Florida Housing will not be able to limit NHTF awards to not-for-profit recipients. The NHTF will finance integrated housing targeted to priority populations. Through this strategy, a few units affordable to ELI households will be integrated into general occupancy properties serving families

and elders. Although not-for-profit developers do apply for and are awarded financing through Florida Housing, many focus on smaller, very specialized developments. In any event, there are too few of them to implement the integrated approach to NHTF described in the Proposed Plan. Florida Housing expects not-for-profit entities to apply for NHTF funding on their own and in partnerships with other developers; however, at this time it is not feasible to limit eligibility solely to not-for-profit recipients.

- More than one commenter proposed that Florida Housing target funding not only to persons with special needs, but prioritize persons with mental illness. Part of Florida Housing's integrated housing approach to NHTF is not to target any single special needs group.
- One commenter suggested that Florida Housing require leveraging of other sources, but not require that these sources be available at the time of application. Although the implementing Requests for Applications (RFAs) may include leveraging criteria, ensuring that firm funding commitments are in place at the time of application is critical to determining an applicant's readiness to proceed. Florida Housing believes it is important to place a priority on readiness to proceed in order to get new NHTF funded units up and running as quickly as possible.
- A group of commenters urged Florida Housing to require strong tenant protections and prohibit excessive tenant application fees, large security deposits, and unreasonable criminal background checks in NHTF financed properties. The specific recommendations have not been adopted as part of the allocation plan. However, Florida Housing will require applicants to develop Tenant Selection Plans which identify strategies to overcome the credit, income, criminal and rental histories which may be a barrier to tenancy for some ELI households. In addition, Florida Housing is implementing new compliance procedures for units targeted to special needs populations.
- One commenter recommended that Florida Housing require a high percentage of the funded units be 1-bedroom. The proposed plan calls for NHTF financed units to have no more than 2 bedrooms, and expects to tailor the percentage of 1-bedroom units required in each Request for Applications to ensure that over time the plan does not limit who may be served.
- One commenter suggested that Florida Housing not prioritize units with rental assistance. In the case of rental housing, the NHTF Interim Rule (24 CFR 93(k)(5)(i)) requires that grantees provide priority for funding to proposed developments based in part on the extent to which the project has Federal, State, or local project-based rental assistance.
- One commenter proposed that Florida Housing use NHTF to finance acquisition and rehabilitation, not just new construction. The NHTF Interim Rule (24 CFR

93.301(b)(1)) requires that grantees who finance rehabilitation with NHTF funds adopt statewide rehabilitation standards. At this time, Florida Housing has chosen not to do this.

- One group suggested that the 30 year affordability period is too long and will pose challenges for long term compliance monitoring. Florida Housing already carries out long term monitoring for many properties in its portfolio. The Interim Rule requires that the affordability period be no less than 30 years. Land Use Restriction Agreements will memorialize NHTF requirements and encumber each property that receives funding for the entire affordability period. Florida Housing will monitor the properties for compliance with these agreements.

**Appendix 1.B.**  
**Written Comments Received**

**Name:** Jaimie A. Ross, President and CEO  
**Affiliation:** Florida Housing Coalition  
**Date:** March 28, 2016

The Florida Housing Coalition's Florida Nonprofit Housing Advocates Network worked together to arrive at what would be best practices for the new NHTF to be administered by the FHFC. The experiences of this group of nonprofit tax credit developers and policy advocates in Florida combined with input from the NHTF experts at the National Low Income Housing Coalition, informed this set of recommendations for your consideration:

1. Prioritize first to 100% Nonprofits, which can include joint venture between two nonprofits; followed by joint ventures between nonprofit and for profit; followed by for profit. This prioritization should be meaningful, so that only if there are no qualified nonprofit applicants, will the NHTF monies be available to joint ventures with for profits and lastly to for profit developers;
2. 50 years of affordability or CLT permanent affordability should be a requirement;
3. Serve ELI or lower income groups entirely;
4. All rental- new construction (no home ownership with NHTF monies) or rehab for existing units that serve ELI- provided those units are at real risk of being lost from ELI housing stock;
5. Avoid targeting the types of projects too narrowly (for instance, naming a particular type of special needs population);
6. Do not use to buy down ELI units already committed to by existing program requirements; Sheila Crowley remarked that it would be great if we could ultimately point to a development and say "that is here because of the NHTF";
7. Use matching fund requirement to leverage NHTF monies but do not require that those funds be available at time of application, only at time of closing.

I hope you find this helpful as you move forward with implementation of the NHTF monies in Florida.

**Name:** Jeffrey M. Hearne  
**Affiliation:** Legal Services of Greater Miami, Inc.  
**Name:** Patrice Paldino, Housing Umbrella Group Co-Chair  
**Affiliation:** Legal Aid Service of Broward County  
**Name:** Natalie Maxwell, Housing Umbrella Group Co-Chair  
**Affiliation:** Community Legal Services of Mid-Florida  
**Date:** May 26, 2016

The Florida Legal Services Housing Umbrella Group (“HUG”) is comprised of over 150 legal services attorneys and law professors from across Florida who specialize in landlord-tenant issues and represent low-income tenants. We offer these comments for the proposed National Housing Trust Fund Allocation Plan which is open for public comment. We support the proposal to give funding preference to homeless families or persons with special needs whose annual income is around the amount received from SSI. We also support the proposal which provides preferences to developers whose proposals have flexible admission criteria for credit and rental histories.

• **Require “Good Cause” evictions** – One of the most critical protections provided to tenants living in properties funded by the Low-Income Housing Tax Credit is that they can only be evicted for “good cause.” FHFC should require similar protections for NHTF units and the protections must be included in the lease. The good cause requirement is vital to ensuring stability and security of a tenant’s home. This is especially true for more vulnerable segments of the population, such as elderly and disabled tenants with low incomes. Stability and security of tenure is an essential element of the human right to housing, as it is the basis upon which people build their lives. This stability enables people to invest emotionally, financially, and psychologically in their homes and neighborhoods. Stable housing provides continuity for children’s schooling and allows full participation in neighborhood social and political life. Involuntary displacement disrupts these educational and social connections; one of the most grave consequences being serious educational and social disrupts for students plagued with school instability. Additionally, relocation can lead to significant financial costs, ranging from additional security deposits for new tenancy to higher cost of replacement housing.

As advocates for low-income tenants, we have also found that FHFC-funded properties often have admission policies which prevent ELI households from accessing the housing. These admission policies include unreasonable criminal background checks, excessive application fees, and large security deposits. These policies deter many low-income households from applying, and many of those that do apply are rejected because of these policies.

• **Prohibit Tenant Application Fees for NHTF Units** – In some areas of the state, application fees can be more than \$85, and some landlords require each adult on the application to pay the fee. The tenant must pay the application fee even if she is ultimately rejected as a tenant. For a very low-income individual who already has a high rent burden, a fee this high will often prevent them from applying. Since these units will be filled with tenants referred by other agencies, we recommend that FHFC prohibit application fees for NHTF financed units.

• **Limit Security Deposits and Other Move-In Costs to One Month’s Rent for NHTF Units** — Often landlords require a tenant to pay first month’s rent, a security deposit and last month’s rent, as well as key deposits and other miscellaneous fees before moving into a unit. Depending on the rent, the total move-in costs can often exceed \$2,000. For an extremely low income family, it is very difficult, if not impossible, to save up enough money to pay this amount. Therefore, we recommend that FHFC

provide a preference for developers who limit the total move-in costs for NHTF units to one month's rent.

● **Prohibit Unreasonable Criminal Background Checks** –In April 2016, HUD released guidance stating that landlords who conduct overly broad criminal background checks for tenants may violate the Fair Housing Act. To comply with this HUD guidance, we recommend that FHFC prohibit admission policies for NHTF units which would deny a tenant based solely on arrest records or which would deny a tenant for convictions more than 3 years old. The NHTF allocation plan should also give a preference to any developer who has a Tenant Selection Plan which provides a grievance process for an applicant to review an application denial. FHFC should also require all landlords to make their tenant selection plans available online. The allocation plan should also make explicit that NHTF units cannot be filled with tenants who have a Section 8 housing choice voucher. Otherwise, there will be no net increase in the number of ELI units in the community through the NHTF funds. Thank you for your consideration of these comments. If you have any questions, please do not hesitate to contact us.

**Name:** Steven Wetstein  
**Date:** June 12, 2016

I strongly support:

- Limiting NHTF funds to housing for low-income individuals with special needs, particularly individuals with mental health conditions.
- Ensuring that the plan as outlined is enforced by the compliance staff during implementation;
- Limiting awards of NHTF funding to not-for-profit organizations.

**Name:** Olga Golik  
**Affiliation:** Citrus Health Network, Inc.  
**Date:** June 30, 2016

Just a quick note to say I support the proposed deeper income targeting with these funds to target persons at or below SSI income levels. I appreciate the comments in the public meetings being incorporated. I also support the comments submitted by Jeffrey Hearne of the Housing Umbrella Group. Excessive background checks and fees for applications and deposits continue to be a barrier. I also encourage Florida Housing to ensure that the requirements outlined in the proposed plan are incorporated in the contract and the compliance steps of the implementation of this plan. Thank you for your work in this important area.

**Name:** Maureen Kempa, MA, NCC, LMHC, Area Director  
**Affiliation:** Guidance/Care Center, Inc.  
**Date:** July 11, 2016

I understand that the FHFC is managing nearly \$4.6 million in NEW federal funds from the National Housing Trust Fund for affordable housing for very low-income residents in Florida. We desperately need housing in **Monroe County**.

**We support the plan and would like to see it strengthened by:**

- **Limiting the NHF funds to housing for low-income individuals with special needs, particularly individuals with mental health conditions.**
- **Ensuring that the plan as outlined is enforced by the compliance staff during implementation;**
- **Limiting awards of NHTF funding to not-for-profit organizations.**

Thank you for your assistance

**Name:** Mariamee Rodriguez, CRPS-A Judicial Support Specialist  
**Affiliation:** South Florida Behavioral Health Network, Inc.  
**Date:** July 11, 2016

In my opinion part of Mental Health recovery is access to housing. A safe place. For consumers to reach their full potential to recovery is having the basic human needs met from the beginning. Housing, medical care, mental health services, food and medications. Once all these are established for the consumer everything else will day by day fall into place. Housing is pivotal.

**Name:** Aaron Moore, Mental Health Specialist  
**Affiliation:** Community Health of South Florida Inc.  
**Date:** July 11, 2016

More and more people in Miami are forced to live on streets of our city each year. The problem that they face is qualifying for disability. It is taking longer and longer for these individual to qualify, and even though they admit to being homeless in their application, they are still denied disability, they are also being treated for mental health illnesses, is it possible that they will be given housing, how will they qualify? They have absolutely no income, what will become of them, how will they be affected by these monies?

**Name:** Sandra Smallwood Beltran  
**Date:** July 12, 2016

I am concerned about the lack of affordable and/or supportive housing for people with mental illness in Miami-Dade. I would like to see the plan strengthened by:

- Limiting the NHF funds to housing for low-income individuals with special needs, particularly individuals with mental health conditions,
- Ensuring that the plan as outlined is enforced by the compliance staff during implementation,
- Limiting awards of NHTF funding to not-for-profit organizations.

Thank you for taking these into account when deciding how to allocate your funds.



**Name:** Trudy Weitzer  
**Date:** July 11, 2016

Please, we need housing for people with mental disorders. I have 2 adult daughters with mental illness & can't find any housing for them.

**Name:** Denise Deshazior, AA Lead CBHT  
**Affiliation:** Jefferson Reaves House  
**Date:** July 11, 2016

It is with great concern I voice how hard it is for the growing population of mental health clients who are seeking housing to obtain it. 99% of the clients discharged from any program have difficulty transitioning into a safe and healthy environment due to availability and cost.

I currently work with clients that suffer from mental health and substance abuse issues and this is one of the most noted challenges clients face daily.

Although these individuals may or may not receive an income such as employment, SSA, SSDA SSI, it is still extremely difficult to find affordable housing suitable for dwelling.

The housing market in Miami Dade County and Broward does not cater to the growing need of low income mental health individual needs for housing. It was a wonderful thing when Car Four came about but, there are not many vacant available throughout the counties.

In order for mental health client to remain stable with medication adherence it vital to have a safe clean environment to be organized, keep up with appointment store medication, receive case management have a sense of belonging.

In a perfect world we all would like to have what we want however this is a need and not a want.

**Name:** Andy McClellan, Board President  
**Affiliation:** The Key Clubhouse of South Florida  
**Date:** July 16, 2016

I was very glad to see that proposed plan for the allocation of the National Housing Trust Fund funding includes a priority for projects that serve extremely low and very-low persons and households with special needs.

One large population that has been overlooked in the past has been individuals with mental illness living on SSI. Miami-Dade County has a critical shortage of affordable housing for that group. Decent, supportive housing is one of the keys necessary for individuals with serious mental illness to become stable and reintegrate in the community. Without it, individuals who are coming out of the hospital or jail end up cycling into homelessness or back into the criminal justice system. Our organization, The Key Clubhouse of South Florida, serves adults with serious mental illness, and finding safe and affordable housing for our members who are homeless or on the verge of becoming homeless is always a great challenge.

Since there is so little funding for affordable housing dedicated to this population and the \$4.5 million per year will not go very far when it is distributed throughout the state, I would like to recommend that the funds be allocated exclusively for projects for this population, whether or not they meet HUD homeless criteria.

I would like to recommend that the funding be limited to not-for-profit entities, as the for-profit developers (at least in our community) do not have a reliable track record of actually serving low and very-low income individuals.

Finally, I would also urge the Florida Housing Finance Corporation put in place a strong compliance component to carefully monitor the use of these funds to ensure that they are being used according to the plan.

Thank you for listening to housing advocates about the need for affordable housing for this target population.

**Name:** Debra Webb, APR, MPA, Executive Director  
**Affiliation:** The Key Clubhouse of South Florida  
**Date:** July 21, 2016

I was pleased to see that the proposed plan for the allocation of the National Housing Trust Fund funding includes a priority for projects that serve extremely low and very low persons and households with special needs.

As the Executive Director of The Key Clubhouse of South Florida, serving people with severe mental illness, I have seen first hand the devastation of the lack of housing for this special population. Dignified and supportive housing is one of the keys necessary for people living with mental illness to become stable and reintegrate into the community. While our mission is to help people living with mental illness reintegrate back into the community through paid employment and school, they are still struggling with being homeless.

On behalf of the people we serve and their families, I would like to recommend that the funding be limited to not for profit organizations who are serving this special population whether or not they meet HUD homeless criteria. I would also recommend the Florida Housing Finance Corporation put in place monitoring tools to ensure these funds are being used for people living with this devastating illness.

Thank you for the opportunity to allow our organization to give input on this matter.

**Name:** Jaimie A. Ross, President and CEO  
**Affiliation:** Florida Housing Coalition  
**Date:** July 25, 2016

The Florida Housing Coalition's Florida Nonprofit Housing Advocates Network (FNHAN) appreciates the work done by the Florida Housing Finance Corporation to prepare a proposed National Housing Trust Fund Allocation Plan that targets extremely low-income and very low-income renters. We wish to submit the following comments in advance of the Public Hearing on July 28, 2016.

1. The Proposed Allocation Plan contains no language expressing a priority for nonprofit organizations. We recommend that the Plan give first priority to 100% Nonprofits, which can include joint ventures between two nonprofits; followed by joint ventures between nonprofit and for-profit entities; followed by for-profits. This prioritization should be meaningful, so that only if there are no qualified nonprofit applicants, will the NHTF monies be available to joint ventures with for-profits and lastly to for-profit developers.

FNHAN appreciates the Proposed Allocation Plan's incorporation of a preference for applicants that commit to develop tenant selection plans that recognize the screening barriers faced by ELI households. Nonetheless, we reiterate our preference for a nonprofit funding priority because our group members' experience with housing development for ELI populations suggests that mission-based nonprofits have the greatest experience with and commitment to serving tenants with such barriers, and are best able to translate an on-paper tenant selection plan into meaningful implementation.

2. The Proposed Allocation Plan proposes a minimum affordability period of 30 years. Florida has been a national leader in ensuring affordability for 50 years. It makes no sense to move backwards at the same time we know that we are falling further behind in meeting the housing need in Florida and that the most critical shortfall is in housing for extremely low income populations. Since long-term affordability is a best practice, we recommend that Florida's Proposed Allocation Plan stipulate that every RFP will include an affordability period of 50 years; this could also be accomplished by giving substantial points for additional years of affordability beyond 30 years.

3. FNHAN applauds the Proposed Allocation Plan's State Preferences for certain segments of the ELI population, which target vulnerable households while remaining sufficiently broad to provide opportunity to a wide range of developers when individual RFAs are targeted too narrowly—for example, to veterans or youth aging out of foster care—they provide opportunities for only a limited range of developers to grow their capacity and respond to pressing housing needs in their communities. We ask that the Proposed Allocation Plan strengthen this balance between targeting and breadth by explicitly expressing an intention to not target individual RFAs too narrowly.

4. FNHAN applauds the Proposed Allocation Plan for indicating an intention to use NHTF funds to finance units that would not otherwise be created, in addition to other Florida ELI units financed by Florida Housing. We recommend that the statement, "NHTF-financed units ... may be in addition to other Florida ELI units provided at the property," be revised to state that these units will be in addition to other Florida ELI units.

5. Page 7 of the Proposed Allocation Plan states, "Additional criteria may be added that [are] of less relative importance than the above criteria. Depending on the source of financing being offered, local government contributions and other leveraging strategies will be incorporated into RFAs." While FNHAN appreciates the inclusion of this language, we recommend that the Proposed Allocation Plan make an explicit commitment to include, at least for certain RFA types that the Plan may specify, a requirement or preference for proposed developments with matching funds from local government, philanthropic, or other sources. We also recommend that the Proposed Allocation Plan explicitly state that such matching funds are not required to be available at the time of application, but only at the time of closing.

I hope you find this helpful as you move forward with implementation of the NHTF monies in Florida

**Name:** Shannon Nazworth, Executive Director  
**Affiliation:** Ability Housing  
**Date:** July 29, 2016

I am sorry to send these so late, I read everything on the flight Monday but forget to then send you an email.

First, thank you for the great work on this. It is encouraging to see the state's expanding efforts to serve Floridians with the greatest need. I had a few questions/comments, my apologies for the brevity. Most of these are likely more related to implementation than the actual plan being submitted. I actually stated my vacation this morning and want to get started with it...

- I would require a high percentage of the funded units be 1-bedroom; in the communities we serve the greatest need among households relying upon SSI income is for 1-bedroom units
- When the plan references considering the extent to which the proposed development has rental assistance, is this intended to focus on projects without that assistance? As you know, I do not believe units with this assistance require additional subsidy to serve ELI and SSI reliant households
- Why are acquisition/rehab projects not eligible? I don't understand why an acq/rehab project cannot serve these households. Couldn't acq/rehabs – with fully accessible units – serve these households
- On pages 12 and 22 – I think you want to remove the "<" before 100,000 in the range
- On pages 18 and 21 – don't you mean 66 units, not 16
- Page 23 – in number 3, I think you mean managers at NHTF-funded properties

Thanks – sorry I couldn't call in yesterday for the meeting. I had a conflict that couldn't be rescheduled.

**Name:** Jane Bevan  
**Affiliation:** Circuit 20 Substance Abuse & Mental Health Consortium  
**Date:** August 1, 2016

We shared the proposed National Housing Trust Fund Allocation Plan for Florida with our Circuit 20 Consortium members on Mental Health and Drug Abuse. My instant comment was WOW!. How hard you and your staff have worked on getting this proposal ready.... You are to be commended.

The main comment from some members and those who have worked with Agencies on Grants etc.... is that under the section " NHTF Funding Priorities- 91.320(k)(5)..., the proposal lists that the affordable at designated income levels...must remain affordable for 30 years"....The 30 year time line was deemed to be unreasonable. Some members advised that with other local agencies, just to do the monitoring for 30 years was just too much. Please advise, is this a Federal Guideline? Will your agency be monitoring for 30 years. How does one keep the reasonable rent for 30 years? What Group or Construction Co. is willing to take this on for 30 years?

Thank you, again for taking the time to respond

## Grantee Unique Appendices

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### UNIQUE APPENDICES

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### Five-Year Consolidated Plan

#### **ES-05 Executive Summary -Summary of public comments**

The following is a summary of the public comments received at each of the five public meetings held during the citizen participation process for the development of the 2015-2020 Consolidated Plan.

#### Tallahassee Public Meeting Comments

- No comments were received due to no attendance.

#### Fort Lauderdale Public Meeting Comments

- Collier County
  - need for Street Improvements (paving, pothole repair, etc.)
  - need for economic development activities to promote job creation and small business growth
- Jim Karras Consulting Group
  - need for affordable rental and homeownership housing for all income levels

#### Jacksonville Public Meeting Comments

- St. Johns County
  - need for production of affordable multi-family rental housing developments
  - need for homeless services for unsheltered persons
  - need for public services for mentally ill homeless persons
- City of St. Augustine
  - need for production of affordable multi-family rental housing developments
  - need for homeless services for unsheltered persons
  - need for demolition of dilapidated and blighted housing structures
  - need for more housing activities to restore historic housing structures
- City of Jacksonville
  - need for homeless services for unsheltered persons in the urban core of the city and non-entitlement counties neighboring the city

#### Lake City Public Meeting Comments

- No comments were received due to no attendance.

#### Bartow Public Meeting Comments

- Hardee County
  - need for housing rehabilitation (rental and ownership) due to aging housing stock and incomplete facilities



- state should allow economic development category activities to allow developers to use grant funds for finance gaps due to higher market costs
- DeSoto County
  - need for demolition of slum and blight along U.S. Highway 17 in county limits
  - state should change the current funding category percentages to reflect higher percentages of funding for Housing Rehabilitation and Neighborhood Revitalization activities, and less in the Economic Development category
  - instead of bonus points on applications, local governments should receive higher priority for funding in rural areas of economic concern (special designations)
- Angie Brewer and Associates, Inc.
  - conflicts of interest involving County Commissioners from local governments are serving on regional planning councils
  - more economic development opportunities are needed in the South, Southwest, and Southeast regions of Florida
  - developers in those regions are open to economic development funds for the development of proposed shopping centers and promise jobs, but need incentives and access to funding to do so
  - the CDBG application cycles should be more predictable and easier to plan for (i.e., each year the cycle starts in June)

One hard copy of a Consolidated Plan survey was received from Hardee County. It indicated high and moderate priority rankings for all housing needs and types for all segments of the population. It indicated a high priority ranking for mental health care facilities (production and operation). It indicated a high or moderate need for all community infrastructure needs. No other needs were indicated.

No online survey responses have been received.

#### Market Analysis

##### **MA- 30 Homeless Facilities and Services – 91.310(b)**

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Emergency Shelters are temporary residences for homeless people which seek to assist homeless populations with homelessness, including protection from extreme weather conditions. These facilities are on a first come, first served basis. In addition, Florida has financed affordable housing targeted to serve homeless individuals and families. Table 36 provides a list of key properties for this purpose. Additional homeless housing is available through local Continuum of Care and other local programs around the state.



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Table 36: Housing for Homeless Persons

Development Name	Address	Housing Programs	Total Units	Assisted Units	Targeted Population	Occupancy
Tropic Hammock	417 Rock Pit Rd., Titusville	Farmworker Housing Supportive Housing	10	10	Homeless	Ready for Occupancy
Marian Manor	4200 Lister Street, Port Charlotte	Local Bonds;State HOME	31	31	Family;Homeless	Ready for Occupancy
Eden Gardens Supportive Housing	Marion Lake South Of Westclox Street, Immokalee	Demonstration Project	4	4	Homeless	Ready for Occupancy
Lake City Cabins For Veterans	1049 NW Winborn Way, Lake City	SAIL	32	32	Homeless	Ready for Occupancy
Liberty Center Iv	2203 Art Museum Drive, Jacksonville	Housing Credits 9%;Predevelopment Loan Program;SAIL	100	100	Homeless	Ready for Occupancy
Mayfair Village	3539 Beach Boulevard, Jacksonville	Exchange;Housing Credits 9%;State HOME	83	83	Family;Homeless; Link	Ready for Occupancy
Renaissance Village	3140 Franklin St, Jacksonville	Demonstration Project	52	52	Family;Homeless	Ready for Occupancy
Pensacola Veteran Housing	1622 Blackwell Lane, Pensacola	SAIL	30	30	Homeless	Ready for Occupancy
Hannah House	1917 South Florida Avenue, Wauchula, Avon Park	SAIL	17	17	Family;Homeless	Ready for Occupancy
Lakeside Park I	21 Tulane Drive	SAIL	16	16	Family;Homeless	Ready for Occupancy
Magnolia Acres	Scattered Sites, Tallahassee	Demonstration Project	27	27	Homeless;Persons with Disabilities	Ready for Occupancy
Amistad	Scattered Sites, Miami	Housing Credits 9%;State HOME	89	89	Homeless	Not Ready for Occupancy
Bonita Cove	5175 NW 2nd Avenue, Miami	Exchange;Housing Credits 9%;State HOME	60	60	Family;Homeless; Link	Ready for Occupancy
City View /Little River Bend	8240, 8250, 8260 NE 4 Place, Miami	Demonstration Project	66	66	Homeless	Ready for Occupancy
Dr. Barbara Carey-shuler Manor	1400 NW 54 Street, Miami	Exchange;SAIL;Supplemental	100	100	Family;Homeless	Ready for Occupancy
Labre Place	350 NW 4th Street, Miami	Exchange;Housing Credits 9%;SAIL	90	90	Family;Homeless	Ready for Occupancy
Royalton	131 SE 1st Street, Miami	Housing Credits 9%;Predevelopment Loan Program;SAIL	100	100	Family;Homeless	Ready for Occupancy
Shepherd's Court	1603 NW 7 Ave, Miami	Exchange;Housing Credits 9%;State HOME;Tax Credit Assistance Program	80	80	Homeless	Ready for Occupancy
St. Martin's Place	1170 NW 7th Avenue, Miami	Housing Credits 9%;State HOME	94	94	Homeless	Not Ready for Occupancy
Villa Aurora	1398 SW 1st Street, Miami	Housing Credits 9%;SAIL	76	76	Family;Homeless	Ready for Occupancy
Harding Village - Miami Beach	8540 Harding Ave, Miami Beach	Housing Credits 9%;Predevelopment Loan Program;SAIL	92	92	Homeless	Ready for Occupancy
Sunsouth Place	530 Meridian Ave, Miami Beach	Demonstration Project;Predevelopment Loan Program	71	71	Homeless	Ready for Occupancy
Casa Matias	14340 SW 260th St, Naranja	Exchange;Housing Credits 9%;State HOME	80	80	Family;Homeless	Ready for Occupancy
Homes For New Beginnings	4049 S Orange Blossom Trail, Orlando	Demonstration Project	178	178	Homeless	Ready for Occupancy
Quiet Waters	306 SW 10th Street, Belle Glade	Housing Credits 9%;SAIL	93	93	Family;Homeless	Ready for Occupancy
Pinellas Hope II	5726 126th Avenue North, Clearwater	SAIL	80	80	Homeless	Ready for Occupancy
Center Of Hope	384 15 St N, St. Petersburg	Demonstration Project	88	88	Homeless	Ready for Occupancy

Job Training and Placement Programs – Employment training and placement is provided through different programs to assist homeless persons, and non-homeless special needs persons in finding permanent and temporary paid employment.

The information provided below describes DEO workforce programs and services, listed on DEO's website at <http://www.floridajobs.org/office-directory/division-of-workforce-services/workforce-programs>. Also, the links to the programs described below provide direct access to additional guidance and resources offered by other Federal and State Departments and Agencies.

- Agricultural Services Program - The Agricultural Services program is an outreach and employment program for migrant and seasonal farm workers.
- Alien Labor Certification Program - The Alien Labor Certification program oversees the hiring of foreign workers by employers.
- Career and Professional Education Act of 2007 - The Florida Career and Professional Education Act was created to provide a statewide planning partnership between business and education communities, to expand and retain high-value industry, and sustain a vibrant state economy.
- Disability Program Navigator - The Disability Program Navigator initiative helps CareerSource Florida centers improve employability and increase career opportunities available to job seekers with disabilities.
- Displaced Homemaker Program - The Displaced Homemaker program assists program participants in attaining independence and economic security.
- Eligible Training Provider List - The Eligible Training Provider List (ETPL) is designed to assist individuals receiving Workforce Investment Act (WIA) services in finding approved training providers for demand occupations, either within their local area or from a statewide list.
- Federal Bonding Program - The Federal Bonding Program is an incentive program that allows employers to hire with limited liability to their business at-risk job applicants.
- The Military Family Employment Advocacy Program - The Military Family Employment Advocacy Program delivers priority workforce services for eligible military family members in the State of Florida.
- Priority Reemployment Planning Program (PREP) - Florida's Priority Reemployment Planning program works with individuals who may exhaust their reemployment assistance benefits and who are unlikely to return to their former profession.
- Reemployment and Emergency Assistance Coordination Team (REACT) - Florida's dislocated worker unit is the state's provides assistance to dislocated workers.
- Reemployment Eligibility and Assessment (REA) Program - The Reemployment Eligibility and Assessment program helps reemployment assistance claimants return to work faster, and thus shorten their claim duration.
- Supplemental Nutrition Assistance Program - The Supplemental Nutrition Assistance Program emphasizes work, self-sufficiency, and personal responsibility. Program participants gain valuable skills, training, and work experience in an effort to reach total self-sufficiency.
- Trade Program - This program assists workers who have been laid off or whose jobs have been threatened because of foreign competition.

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- Veterans Employment Program - Find information on job referrals, job development, referrals to training and supportive services, case management, labor market information, resume assistance and more.
- Wagner-Peyser - This labor exchange program matches individuals who are seeking employment and employers who are in need of workers.
- Welfare Transition Program - The Welfare Transition program helps people go from welfare to work.
- Work Opportunity Tax Credit Program - The Work Opportunity Tax Credit is an incentive to private, for profit employers to hire individuals from certain targeted groups.
- Worker Adjustment and Retraining Notification Act - The Worker Adjustment and Retraining Notification Act (WARN) provides protection to workers, their families and communities by requiring employers to provide notification 60 calendar days in advance of plant closings and mass layoffs.
- Workforce Investment Act - The Workforce Investment Act helps individuals find jobs and career planning tools and helps businesses find skilled workers.

Transitional Housing Programs – Assistance in helping homeless individuals and families to save money for their permanent housing while working to increase and stabilize their income and build their independent living skills. Many programs are specifically for certain populations like families, chronically homeless, veterans, and youth. The Florida Department of Children and Families 2014 Report on Homelessness states that there are 13,968 units of transitional housing in the state.

Rapid Re-housing - This program assists moving homeless families into permanent housing as quickly as possible and provides supportive services to ensure the family is stabilized. The latest list of grantees provided by Department of Children and Families is as follows:

- Alachua County Coalition for the Homeless and Hungry serves Putnam, Levy, Bradford, and Gilchrist Counties,
- Catholic Charities of Northwest Florida serves Bay, Calhoun, Franklin, Gadsden, Gulf, Holmes, Jackson, Madison, Taylor, Jefferson, Liberty, Wakulla, and Washington Counties,
- Charlotte County Homeless Coalition serves Charlotte County,
- Flagler County Human Services serves Flagler County,
- Highlands County Coalition for the Homeless serves DeSoto, Glades, Hardee, Hendry, Highlands, and Okeechobee Counties,
- Emergency Services and Homeless Coalition of Jacksonville serves Duval, Baker, Clay, and Nassau Counties,
- Kids Central, Inc. serves Citrus, Hernando, Lake, and Sumter Counties,
- Okaloosa Walton Homeless Continuum of Care/Opportunity serves Okaloosa and Walton Counties,
- Osceola County, Human Services serves Osceola County,
- Families Count (Northwest Florida Comprehensive Services for Children) serves Santa Rosa County,
- Monroe County, Social Services serves Monroe County,
- Salvation Army of St. Johns County serves St. Johns County,

- Treasure Coast Homeless Services Council, Homeless Resource Center serves Indian River, St. Lucie, and Martin Counties,
- United Way of Suwannee Valley serves Columbia, Hamilton, Lafayette, Suwannee, and Union County.

**MA-50 Needs and Market Analysis Discussion**

**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

For the purpose of this section of the Market Analysis, the term "concentration" will be used to describe areas where a county has a higher number of minority or low-income households than the state average. The state's average total minority population, including all racial and ethnic groups classified by the U.S. Census Bureau, is 42.1 percent. The state's average total low-income household population is 25.7 percent according to the U.S. Census Bureau 2013 data.

According to the 2014 U.S. Census Bureau data, Florida's minority average percentage of the population is 42.1 percent. As of 2013, according to the Florida Office of Economic and Demographic Research (EDR), Hispanics represented about 23.5 percent of Florida's total population. As of 2013, the Black or African American race group represented 17.1 percent of Florida's total population. Other race group percentages are Alaskan Native/Native American at 0.3 percent, Asian at 2.5 percent, and Native Hawaiian or other Pacific Islander at 0.1 percent.

To determine if any counties in Florida have a high racial or ethnic concentration, the percentage of a particular race or ethnicity within a county can be compared to the total state minority average percentage, which is 42.1 percent. If any racial or ethnic groups represent more than 42.1 percent of a county's total population, then it can be determined a minority concentration is apparent. According to the 2013 EDR report on Florida's Population Demographics, only five counties out of the total 67 counties had a minority or ethnic population over 42.1 percent. In 2013, Gadsden County had a Black or African American population of 55.9 percent of the total county population. Also in 2013, Miami-Dade County had a Hispanic population of 66.4 percent, Hendry County had a Hispanic population of 53.2 percent, Osceola County had a Hispanic population of 47.4 percent, and Hardee County had a Hispanic population of 43.3 percent of their total county wide populations. With a total statewide minority percentage of 42.1 percent, all five of those counties have a minority concentration above of the state average. None of the other racial or ethnic groups classified by the U.S. Census Bureau had an average minority population percentage of 42.1 percent or higher in any county in Florida.

The area median household income in Florida, according to the 2009-2013 American Community Survey five-year estimates, is \$46,956. Households with an income of at or below 50 percent of the AMI are defined as low-income households. In Florida, these households would have an income of \$23,478 or less. The state's average low-income household population is 25.7 percent. According to the 2013 U.S. Census Bureau household income data by county, 38 counties in Florida had a higher proportion of low-income households than 25.7 percent. Those counties include Alachua, Bradford, Calhoun, Charlotte, Collier, Columbia, DeSoto, Dixie, Escambia, Franklin, Gadsden, Gilchrist, Glades, Gulf, Hamilton, Hardee, Hendry, Hernando, Highlands, Holmes, Jackson, Jefferson, Lafayette, Levy, Liberty, Madison, Marion, Miami-Dade,

Okeechobee, Pasco, Polk, St. Lucie, Suwannee, Taylor, Union, Volusia, Walton, and Washington Counties. The county with the highest proportion of low-income households is Jackson County with 46.1 percent. The county with the second highest number of low-income households is Dixie County with 38.6 percent. For the purpose of estimating the housing market characteristics in counties with the highest low-income household percentages and in counties with the highest concentration of minorities, the two counties with the highest concentration of low-income households and the five counties with the highest minority concentrations will be evaluated below.

What are the characteristics of the market in these areas/neighborhoods?

Housing Market Characteristics in 2013 for the five counties with high minority concentration, per the Shimberg Center for Housing Studies:

- Gadsden County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 62
  - Overcrowded households (1.01 or more persons per room): 954
  - Substandard households (lacking heating, kitchen facilities, plumbing): 1,582
  - Owner households: 13,038
  - Renter households: 4,681
  - Average home sales price: \$138,666
  - Average rent price: \$690 per month
- Miami-Dade County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 6,546
  - Overcrowded households (1.01 or more persons per room): 44,237
  - Substandard households (lacking heating, kitchen facilities, plumbing): 66,861
  - Owner households: 505,599
  - Renter households: 400,040
  - Average home sales price: \$456,605
  - Average rent price: \$1,085 per month
- Hendry County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 28
  - Overcrowded households (1.01 or more persons per room): 697
  - Substandard households (lacking heating, kitchen facilities, plumbing): 879
  - Owner households: 8,153
  - Renter households: 3,591
  - Average home sales price: \$95,470
  - Average rent price: \$753 per month
- Osceola County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 1,381
  - Overcrowded households (1.01 or more persons per room): 2,544
  - Substandard households (lacking heating, kitchen facilities, plumbing): 1,894



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- Owner households: 63,687
- Renter households: 34,372
- Average home sales price: \$186,163
- Average rent price: \$1,030 per month
- Hardee County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 3
  - Overcrowded households (1.01 or more persons per room): 631
  - Substandard households (lacking heating, kitchen facilities, plumbing): 1,118
  - Owner households: 5,838
  - Renter households: 2,590
  - Average home sales price: \$77,704
  - Average rent price: \$677 per month

Housing Market Characteristics in 2013 for the two counties with high low-income household concentration, per the Shimberg Center for Housing Studies:

- Jackson County
  - Households considered to be severely cost burdened 50 percent or greater of monthly income used for housing costs): 21
  - Overcrowded households (1.01 or more persons per room): 258
  - Substandard households (lacking heating, kitchen facilities, plumbing): 693
  - Owner households: 13,062
  - Renter households: 4,506
  - Average home sales price: \$115,215
  - Average rent price: \$619 per month
- Dixie County
  - Households considered to be severely cost burdened (50 percent or greater of monthly income used for housing costs): 13
  - Overcrowded households (1.01 or more persons per room): 86
  - Substandard households (lacking heating, kitchen facilities, plumbing): 748
  - Owner households: 5,136
  - Renter households: 1,105
  - Average home sales price: \$127,520
  - Average rent price: \$618 per month

### Strategic Planning

#### **SP-25 Priority Needs – 91.315(a)(2)**

##### **Priority Needs**

The priority needs listed in the chart are based on stakeholder surveys sent and received and from comments received from the five public meetings. There is no priority order to how needs are listed.

**Narrative (Optional)**

For the Small Cities CDBG program, allowing the local governments to establish their priority need with each application has been the most beneficial to local subrecipients. It allows 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 or may result in a community not submitting an application because the state established priority is not responsive to a local priority.

According to the 2012 CAPER completed by the Florida Department of Economic Opportunity in 2013, the following funding priorities and level of importance were identified in Consolidated Plan surveys and other citizen participation activities:

- Job creation (high),
- flood and drainage (high),
- street improvements (high),
- sewer line improvements (high),
- water line improvements (high),
- community centers (moderate),
- parks and recreation facilities (moderate),
- sidewalk improvements (moderate),
- commercial industrial rehabilitation (moderate),
- senior centers (low),
- youth centers (low), and
- parking facilities (low).

Annual funding allocations for the four CDBG program areas are based on the applications received in the past and based on comments received from the public during the preparation of the Annual Action Plan.

According to the 2015 HOPWA Annual Action Plan, the following housing services were selected as the priorities for the 2015-2016 fiscal year, and though the priorities will change over the next five fiscal years, these priorities will all receive continuous allocated funding to some degree based on need and priority chosen by public participation and market trends.

- Short-Term Rent, Mortgage and Utility Payments
  - Beneficiaries to be served: 1,756
- Short-Term Supported Housing Facility Assistance
  - Beneficiaries to be served: 62
- Supportive Services
  - Housing Case Management: Beneficiaries to be served: 2,332
  - Other Services: Beneficiaries to be served: 747
- Housing Placement Assistance Activities
  - Beneficiaries to be served: 857
- Tenant-Based Rental Assistance (All counties; New priority beginning 2016)

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UNIQUE APPENDICES

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- Beneficiaries to be served: TBD
- Grantee and Project Sponsor's Administrative Services
  - Beneficiaries to be served: N/A

According to the 2015 HOME Program Annual Action Plan, the following housing services were selected as the priorities for the 2015-2016 fiscal year. The number of beneficiaries served or types of housing units being addressed have also been included in the priority needs for the current fiscal year. Though the number of beneficiaries served or types of housing units being addressed will change over the five year planning period, the types of eligible affordable housing activities will remain the same.

- Annual Affordable Rental Housing Goals (Section 215)
  - Production of new units: 250 units
- Rental Assistance
  - 500 beneficiaries served
- Annual Affordable Owner Housing Goals (Section 215)
  - Homebuyer Assistance: 50 beneficiaries served
- Annual Affordable Housing Goals (Section 215)
  - No production of new units or beneficiaries expected to be served for homeless, non-homeless or special needs households (specifically)

According to the 2015 ESG Annual Action Plan, the following eligible activities were selected as the priorities for reducing homelessness for the 2015-2016 fiscal year. Due to expected increases or decreases in funding over the current five-year planning period, FY 2015-2020, and changes in priority level for these types of eligible categories and activities, it is understood that the amounts of funding for each of the priority needs identified will fluctuate and be updated when necessary in the single year Action Plans.

- Outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individuals needs: \$240,000 in funding (or 4.9 percent of the total award); funding will be available for the state's 28 Continuum of Care agencies throughout Florida
- Operation and Maintenance for Emergency Shelters and Transitional Housing facilities: \$1,700,000 (or 33.8 percent of the total award); approximately 21 shelter facility beneficiaries
- 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 independent living: \$2,900,000 (or 57 percent of the total award); approximately 37 housing provider beneficiaries.

**SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)**

**Introduction**

The Florida Small Cities CDBG Program will receive \$24,019,316 in funding for fiscal year 2015. Of the total funding allocation, \$100,000 (unmatched) plus 2.5 percent (matched with General Revenue) will be spent on Administration activities, 0.5 percent will be spent on Training and Technical Assistance, and 2.5



percent will be allocated to Emergency Set-Aside activities. That leaves approximately \$22,598,253 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, prioritized the funds for each category by percentage. The funding percentages for each category were determined by analyzing past requests for funding. Public input on the Consolidated Plan, collected during the five public meetings, was also used in determining how the funds were allocated.

Consolidated Plan Survey results received indicates a high priority for affordable rental housing and owner-occupied housing rehabilitation, as well as storm-water drainage and street improvements for all regions in Florida. These survey results were used in determining how the funds were allocated. This section provides a breakdown of funds for the first fiscal year 2015 of the 2015-2020 Consolidated Plan. The current funding percentages and dollar amounts for each category are as follows: Neighborhood Revitalization \$8,587,336 (38 percent), Housing Rehabilitation \$5,649,563 (25 percent), Economic Development \$6,869,869 (30.40 percent), and Commercial Revitalization \$1,491,485 (6.6 percent).

In 2015, the State ESG Program will receive a total allocation of \$5,019,268 in funding for fiscal year 2015. Of the total funding allocation, \$1,700,000 will be spent on Emergency Shelters, \$240,000 will be spent on Street Outreach activities, \$2,900,000 will be allocated to Homeless Prevention Services and Rapid Re-Housing activities, and \$345,000 will be spent on Administrative activities. Furthermore, the Florida Department of Children and Families, which administers the State ESG Program, has decided which types of service providers will be receiving funding. The types of service providers include are: (1) Homeless Prevention Grants direct to families at risk of homelessness, (2) local level homeless coalitions for data collection and coordination with the twenty-eight Continuum of Care (CoC) agencies, (3) the Council and Office on Homelessness for policy development and state agencies coordination, and (4) Challenge Grants to the twenty-eight CoCs throughout the state to fund any of the housing, program, or service needs included within their CoC plan.

For fiscal year 2015, the State HOME Program will receive a total allocation of \$12,251,406. Of the total funding allocation, \$1,837,711 will be reserved for developments that are sponsored by qualified Community Housing Development Organization (CHDO) applicants. Florida Housing Finance Corporation has historically exceeded the 15 percent CHDO requirement. In the event insufficient applications meeting threshold are received to allocate this amount to rental developments, the remaining unallocated funds (including CHDO reservation amount) may be shifted to homeownership activities. The same applies to homeownership activities, i.e., the remaining unallocated funds may be shifted to rental activities. The rest of the HOME allocation 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 or through direct homebuyer assistance. \$1.2 million of

the total annual allocation will be used by the Florida Housing Finance Corporation HOME program for administrative costs pursuant to 24 CFR 92.207.

In 2015, the State HOPWA Program will receive a total allocation of \$3,357,058 in funding for fiscal year 2015. Of the total funding allocation, \$3,256,346 or 97 percent of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent 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 three (3) percent of the funding will be spent on administrative activities carried out by the Florida Department of Health, whom administers the State HOPWA Program.

**SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)**

**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 framework for community development, revitalization and community development begins with the State Comprehensive Plan. Florida's Community Development Act (Chapter 163, Part II, Florida Statutes) requires counties and municipalities to adopt Local Comprehensive Plans that guide growth and development planning. These plans, which must be consistent with the State Comprehensive Plan, set out the particular needs of communities and a plan for addressing them.

Funding for the needs identified in local plans comes from a wide variety of federal and state programs. At the federal level, the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Agriculture, the U.S. Department of Transportation, and the U.S. Department of Health and Human Services are among the most significant providers of funding for community development. At the state level, numerous agencies, including but not limited to, the Departments of Economic Opportunity, Children and Families, Environmental Protection, Health, Elder Affairs, State, and Transportation all provide important resources for community needs.

Most state and local government administrators have identified funding sources that can be pooled to make a greater impact within a community. Although programs may be administered by separate agencies, they frequently work together to provide a higher level of funding for infrastructure and community development needs.

**Community Development Resources**

Although the Florida Small Cities CDBG Program (DEO) is the largest source of funding for community development for small and rural communities, a number of other programs make an important contribution to community development by leveraging funds, such as:

Communities for a Lifetime (Florida Department of Elder Affairs) - Eligible activities for this grant funding program include, Housing, Senior Employment, Health, Wellness and Injury Prevention, Transportation and Mobility, and Volunteerism and Intergenerational Programs. Forty-one of Florida's sixty-seven counties participate and administer Communities for a Lifetime programs.

Florida Main Street (Florida Department of State) - The Main Street Program provide technical and training to local governments and local organizations within a community to support their efforts to revitalize traditional downtown and neighborhood commercial districts. Since its inception in 1985, \$2.3 billion of public and private money had been invested into Main Street communities. There are currently forty-four Main Street communities in Florida.

Flood Mitigation Assistance (FMA) Program (Florida Division of Emergency Management) - The FMA program is a federally funded mitigation program that provides funds for cost-effective and technically feasible measures that reduce or eliminate the long term risk of flood damage to buildings and manufactured homes insured under the National Florida Insurance Program. These funds can be leveraged with other state and local funds that promote similar long-term mitigation goals.

Florida Housing Finance Corporation Resources

Multifamily Mortgage Revenue Bonds - The federal Multifamily Mortgage Revenue Bond programs uses both taxable and tax-exempt bonds to provide below market rate loans to non-profit and for-profit developers who set aside certain percentages of their apartment units for low income families. These bonds are also used to finance low interest, fixed rate first time homebuyer mortgages.

Low Income Housing Tax Credits – Provides developers with federal tax credits that are sold to investors who use the credits to get a dollar-for-dollar reduction in their federal tax credit liability in exchange for providing equity to finance the acquisition, rehabilitation and/or new construction of affordable rental housing.

State Apartment Incentive Loan Program - Provides developers with the gap financing needed to obtain full financing to develop affordable rental housing. Requires reservations of funding to specific demographic groups (families, elderly, homeless, special needs, farmworker/fishing worker), and across small, medium and large counties (population based).

HOME Investment Partnerships - Provides funds to developers of affordable housing who acquire, rehabilitate or construct housing for low income families.

**SP-40 Institutional Delivery Structure – 91.315(k)**

**Assess strengths and gaps in the institutional delivery system**

The Florida Small Cities CDBG program is in the Bureau of Community Revitalization within the Florida Department of Economic Development. There are seven grant manager positions in the Small Cities program and a program manager to supervise this staff. In addition, the Operations Unit within the CDBG program has five positions. The Operations staff include an employee to review environmental assessments, an employee for budget issues, an employee assigned to process requests for payments and enter data in the IDIS reporting system, and an employee to prepare and submit the various HUD required reports including the Annual Action Plan, the Section 3 reports, and the Consolidated Annual Performance and Evaluation Report. There is a program manager that oversees the Operations Unit staff. The program also includes an employee for Training and Technical Assistance responsibilities. A Bureau Chief supervises the entire Bureau. The Small Cities staff conducts annual workshops on the funding application process and workshops for grant subrecipients to explain the grant agreement

requirements and how to meet those requirements. The number of staff and the program's training and technical assistance efforts have been sufficient to implement the Small Cities program.

The Florida Emergency Solutions Grant (ESG) program is in the Office of Homelessness within the Florida Department of Children and Families (DCF). The Office of Homelessness has an Executive Director that oversees all office grants, including the Emergency Solutions Grant program. The Deputy Director of the Office of Homelessness serves as the grant manager who drafts the documents for the competitive ESG application process. The Deputy Director and support staff in the Office of Homelessness input all information regarding ESG providers into the Integrated Disbursement Information System (IDIS) for drawdowns, the IDIS system is where all of the grant beneficiary allocation and project information is stored. The DCF Revenue Department inputs all drawdown information to ensure state accounting systems align with IDIS. When the grants are awarded, DCF has twenty-three (23), which fluctuates upon funding availability and geographical location, regional contract managers located throughout the state who handle the ESG contracts. The DCF Contract Oversight Unit conducts reviews on providers if there is ever a performance/standards issue.

The daily operations of the HOME Investment Partnerships Program (HOME) is in the Homeownership Department of Florida Housing Finance Corporation (FHFC). The Assistant Director of Homeownership and the Federal Loan Program Manager are the daily contacts and serve as Grant Managers for the program with additional oversight provided by the Director of Homeownership and the Executive Director of FHFC. Additionally, FHFC contracts with three servicer entities which provide a whole suite of services including Credit Underwriting, Construction and Permanent Loan Servicing, and Compliance Monitoring for FHFC's Rental and Homeownership portfolios. FHFC also contracts with four environmental firms to provide the Environmental Assessments. The Grant Managers work closely with the contracted servicer and environmental providers, review all documents and ensure all conditions are adequately adhered to during the development of the housing. FHFC contracts with two firms to provide all the legal and closing documents for our funded developments. A Multifamily Programs staff person also provides an additional level of review of credit underwriting and loan closing documents to ensure compliance with all applicable state and federal requirements. The Grant Managers enter all required set-up and funding information into the Integrated Disbursement Information System (IDIS) while the Loan Servicing department (consisting of 6 staff) handles the responsibility of the drawdowns. FHFC's Quality Assurance Department (two staff) monitors its contracted service providers to ensure compliance with the contractual obligations to FHFC as well as state and federal laws and regulations, FHFC rules and procedures. FHFC also has an Asset Management Department consisting of 7 staff that works closely with its contracted Compliance Monitors to verify funded developments are providing safe, decent, affordable housing by monitoring financial, physical and occupancy compliance with regulatory documents.

The State Housing Opportunities for Persons with AIDS (HOPWA) program is in the Bureau of Communicable Diseases within the Florida Department of Health. The staff includes a State HOPWA Program Manager who provides programmatic input and direction in the development of contracts, Annual Action Plan, Consolidated Annual Performance and Evaluation Report, and other specified reports or work required as a condition of grant award; provides consultation and technical assistance to Department of Health staff statewide through on-site visits, conference calls and meetings; conducts

contract monitoring of county health departments that serve as project sponsors; works directly with designated Housing and Urban Development staff to ensure relevant information is disseminated to appropriate staff; ensures the development and submission of the State HOPWA grant agreement. The State Housing Coordinator is 60 percent HOPWA and 40 percent Ryan White and serves to establish the link between housing and health-related issues; responsible for developing HOPWA policies and procedures; assists the program manager with various activities including contract development, monitoring of housing activities, needs assessment, and responding to inquiries from the public that include referring to local HOPWA programs or other housing assistance in their respective areas. The Budget Management and Operational Support unit with the HIV/AIDS program has two positions. The staff includes a Financial Manager for budget issues, and a Grant Analyst to enter data in the IDIS reporting system. The Office of Budget and Revenue Management includes three positions. Health Financial Manager that oversees the draws and federal reports and Operations & Management Consultant Manager that completes the drawdown information to ensure state accounting systems align with the grant, and the staff support that enters the draws into the state accounting system.

**SP-70 Anti-Poverty Strategy – 91.315(j)**

**Jurisdiction Goals, Programs, and Policies for reducing 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 primary agencies responsible for anti-poverty programs in the state are the Department of Children and Families (DCF) and the Department of Economic Opportunity (DEO). DCF is the state agency responsible for the distribution of Food Stamps and Temporary Assistance to Needy Families (TANF), the most prominent and recognizable economic supports available. 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 establish businesses in Florida and create jobs. The Small Cities 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: financial literacy, education and training, 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 who are 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, and 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 assists 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, Unemployment Insurance and Temporary Assistance to Needy Families. The Unemployment Insurance programs provides 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, HOMES, 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.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Programs such as the Section 8 voucher and rental assistance program, carried out by public housing authorities and other non-profit governmental agencies in jurisdictions throughout Florida, is a common and effective poverty reducing solution by helping to make housing affordable.

The Florida Weatherization Assistance Program (WAP), funded by the U.S. Department of Energy and receives supplemental funding from the U.S. Department of Health and Human Services. The program reduces the monthly energy burden on low-income households by implementing improvements to make homes more energy efficient and reduce utility bills. Eligible applicants may not have a total household income of more than 200 percent above the national poverty level. Preference is given to elderly (60 years-plus) or physically disabled resident, families with children under 12 and households with a high energy burden. Types of assistance include installation of attic ventilation, installation of solar screens, repair or replace water heaters, addresses air filtration with weather stripping, caulking, thresholds, minor repairs to walls, ceilings and floors, and window and door replacement. This program is administered by DEO and is coordinated with other poverty reducing programs within this affordable housing plan.

In coordination with the Weatherization Assistance Program (WAP), the Low-Income Home Energy Assistance Program (LIHEAP) is also administered by DEO and helps low-income families with heating and cooling costs. DEO roles include applying for funding from the federal government, distributing



funding in the form of grants to non-profit agencies and local governments (local agency providers), monitoring local agency providers to ensure that they administer the funding in compliance with state and federal laws and rules, and providing technical assistance to local agency providers to help them comply with state and federal requirements. Citizens must apply directly to their local government or local agency provider and may apply up to three times per calendar year.

HOME funds are used by FHFC to fund a tenant based short term rental assistance program. Funding is generally available for at least one year to a needy household, but may be used up to two years if needed.

Along with the programs mentioned above, the State of Florida categorizes HUD funded programs such as CDBG, HOME, ESG, and HOPWA, which provide assistance with affordable housing services and opportunities that in-turn help reduce poverty and are coordinated with other affordable housing programs as "Safety Net Programs." In addition to CDBG, HOME, ESG and HOPWA, the program funding and services provided through the programs listed below are commonly available to beneficiaries of other government assisted affordable housing programs:

Temporary Assistance to Needy Families (TANF) - The Welfare Transition program administered by DCF, emphasizes work, self-sufficiency, and personal responsibility structured to enable participants to move from welfare to economic self-sufficiency. To accomplish this, the Florida Legislature, using federal/state funds and statutory requirements, has developed a program structured to deliver services to meet the following goals:

- provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives,
- develop opportunities for families that provide for their needs, enhance their wellbeing, and preserve the integrity of the family free of impediments to self-reliance,
- end the dependence of families on government assistance by emphasizing work, self-sufficiency, and personal responsibility while meeting the transitional needs of program participants who need short-term assistance toward achieving productive lives and gaining the responsibility that comes with self-sufficiency,
- take full advantage of the flexibility provided under state and federal law that allows for providing job preparation and intervention programs to enable welfare recipients to move from welfare to work,
- prevent and reduce the incidence of out-of-wedlock pregnancies,
- encourage the formation and maintenance of two parent families,
- provide oversight and policy direction to the program and to ensure cooperation and accountability among state agencies and service providers to deliver needed services.

Community Service Block Grant (CSBG) Program – This program is administered by the Department of Economic Opportunity. It is designed to provide a range of services to assist low-income people in attaining the skills, knowledge, and motivation necessary to achieve self-sufficiency. Grants to local governments and non-profit agencies provide a variety of antipoverty services such as emergency health, food, housing, day care, transportation assistance; housing counseling; financial management assistance; nutrition programs including federal surplus food distribution, community gardening projects, food banks, job counseling, placement and training services, and homeless prevention programs.

Supplemental Nutrition Assistance Program (SNAP – formerly known as Food Stamps) - The SNAP Program helps ensure that eligible low-income families and individuals are able to obtain a nutritious diet. Benefits are intended to supplement other household income and may only be used to purchase food. This program is administered by the Florida Department of Children and Families.

**SP-80 Monitoring – 91.330**

**Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

CDBG Monitoring

The Small Cities CDBG program uses a regional approach that divides the state into seven areas for managing the program and monitoring subgrant recipients. The grant managers are assigned to regions so that they can become familiar with the area's needs, provide community-based technical assistance, and resolve local subgrant-related issues.

Monitoring begins when the grant manager makes a site visit to a potential subgrant recipient. The Department has checklists specific for each program area that are used at the site visit. The grant manager verifies the accuracy of all information that was provided in the local government's Application for Funding. Audits from the previous two years are reviewed to ensure that there are no unresolved audit findings that could impact the administration of a CDBG project. If applicable, the grant manager visits all service/project areas included in the application to confirm the activities and beneficiaries information.

Following the site visit, the grant manager completes a New Subgrant Risk Assessment Checklist for each application that is selected for funding and a monitoring plan for each application deemed a "High Risk."

The Small Cities CDBG Program currently has 22 checklists that have been developed to assist grant managers in monitoring subgrant activities. The grant managers determine which of these checklists are needed for each on-site or desk monitoring. These checklists ensure that all phases of contract administration that apply to the respective subgrant are appropriately reviewed during the subgrant period.



At least two on-site monitoring visits are conducted for each subgrant agreement during the term of the grant. All monitoring is conducted in accordance with HUD guidelines, as well as applicable federal and state rules and regulations. Projects that are determined to be a "High Risk" will receive a minimum of three on-site visits. The first on-site monitoring visit is normally made when approximately 25 percent of the funds have been expended. A second on-site visit is conducted when construction is about 80 percent complete.

The grant manager conducts additional on-site monitoring visits as needed. Subgrant recipients that are experiencing difficulties are monitored as often as is necessary to ensure compliance with federal and state laws, rules and regulations. These visits may include extensive technical assistance to help the subgrantee build administrative capacity.

Following each monitoring visit, the grant manager prepares a monitoring report. The report lists any deficiencies that were discovered during the monitoring visit and the actions that the subgrantee must take to resolve them. The recipient must respond to all findings and to those concerns that require corrective action.

The Department reviews the recipient's annual audit report, if applicable, to ensure that no audit findings exist that impact the subgrantee's administration of the program. If the Department discovers that the subgrantee's auditor has identified areas that need to be addressed, the local government is notified of the findings and the correctives actions that should be taken to resolve the issue.

Finally, the Small Cities CDBG Program uses a closeout checklist that serves as a final desk review of the project. Contracts are administratively closed when all program requirements have been fulfilled and final payment has been made. Final closeout occurs when all required financial audits have been provided to the DEO and any audit findings have been resolved.

#### HOME Monitoring

Florida Housing Finance Corporation maintains written procedures on compliance monitoring. This section provides a high level summary of HOME monitoring procedures.

On the homeownership side, FHFC annually monitors to ensure that the initial buyer is continuing to occupy acquired property as their principal residence.

For HOME rental developments, in situations where tenants may be displaced as a result of the construction or rehabilitation of the Development, FHFC reviews for compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies. The owner/developer must submit information regarding selection of a management company, which must be approved by FHFC prior to the company assuming development management responsibilities. The compliance monitoring process includes pre-occupancy conferences, review of property program reports and income certification from each development, a management review and a physical inspection.

Prior to the leasing of a property, the compliance monitor conducts a pre-occupancy conference/training with the developer or management company personnel to provide complete

instructions on items related to federal and state requirements, including the agreements in the land use restriction agreement for the particular property.

Management reviews of properties are conducted as follows:

1. For properties which have units occupied at the time of loan closing, the monitor shall conduct the initial review on or before the 120th day after loan closing, and subsequent reviews will be conducted throughout the period of affordability as listed in the Subsequent Review Schedule below.
2. For properties with no units occupied at the time of loan closing, the monitor shall conduct the initial review on or before the 120th day after the leasing of any HOME-assisted unit, and subsequent reviews will be conducted throughout the period of affordability as listed in the Subsequent Review Schedule below.
3. Subsequent Review Schedule

Total Units in Development	Frequency of Reviews
1-4	Within 3 years of the previous review
5-25	Within 2 years of the previous review
26+	Within 1 year of the previous review

4. A follow up review may be required, based on the quantity and nature of the issues found by the Servicer and/or failure to meet Uniform Physical Condition Standards during a management review.

FHFC monitors all HOME activities to ensure compliance with program guidelines and certifies that proposed program activities are consistent with the State Consolidated Plan approved by the U.S. Department of Housing and Urban Development. In order to ensure the requirements of the Davis-Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland Act are being met on any Development receiving a HOME Loan, FHFC receives documentation sufficient to certify to HUD that these requirements are being met.

FHFC also carries out activities and procedures and requires developers receiving HOME funding to:

- Provide an affirmative marketing policy for each development;
- Pursuant to the Minority and Women’s Business Enterprises Outreach Program, encourage sub-recipients, prime contractors and owners of HOME-assisted housing to use minority and women-owned business enterprises that recipients may contact; and
- Carry out activities and procedures in accordance with Section 3 to ensure that employment and other economic opportunities generated by HOME funding shall, to the greatest extent feasible, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic

opportunities to low- and very low-income persons. State recipients, sub recipients and prime contractors will be encouraged to make efforts to reach Section 3 residents and business concerns through employment, training opportunities, and contracting.

HOPWA Monitoring

The Department of Health (DOH) maintains a procedure that establishes "Methods of Administration" to ensure non-discrimination and equal opportunity in services delivery in accordance with state and federal laws. These programs are responsible for providing quality services that are fair, equally effective and accessible; they are also required to provide clients with appropriate aids and benefits. DOH requires service providers with 15 or more employees to designate a Title VI coordinator to coordinate all services to ensure that they are equally effective and equally accessible. Annual compliance reports are required by all services provider agencies.

ESG Monitoring

The state ESG Program, administered by the Florida Department of Children and Families, uses a tiered method for monitoring ESG grant recipients throughout the state. The Office of Homelessness staff undertakes periodic desk reviews for low-risk recipients. These reviews consist of reviewing individual case files, tracking access and performance outcomes and reviewing quarterly reports for any issues. In addition to desk monitoring, staff performs on-site monitoring visits for higher-risk or first-time ESG grant recipients. The Department also assigns contract managers who are responsible for monitoring the contracted grantee and assisting the grantee with any training or technical assistance necessary for success. A final level review, conducted by the Contract Oversight Unit, involves an in-depth review of financial management systems, compliance with federal laws, accessibility and other such cross-cutting federal requirements.

ANNUAL ACTION PLAN

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

**Introduction**

The Florida Small Cities CDBG Program will receive \$24,019,316 in funding for fiscal year 2015. Of the total funding allocation, \$100,000 (unmatched) plus 2.5 percent (matched with General Revenue) will be spent on Administration activities, 0.5 percent will be spent on Training and Technical Assistance, and 2.5 percent will be allocated to Emergency Set-Aside activities. That leaves approximately \$22,598,253 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, 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.

Consolidated Plan Survey results received indicates 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 first fiscal year 2015 of the 2015-2020 Consolidated Plan, funding percentages and dollar amounts for each category are as follows: Neighborhood Revitalization \$8,587,337 (38 percent), Housing Rehabilitation \$5,649,564 (25 percent), Economic Development \$6,869,899 (30.40 percent) and Commercial Revitalization \$1,491,485 (6.6 percent).

In 2015, the ESG Program will receive a total allocation of \$5,019,268 in funding for fiscal year 2015. Of the total funding allocation, approximately \$1,700,000 will be spent on Emergency Shelters, approximately \$240,000 will be spent on Street Outreach activities, approximately \$2,900,000 will be spent on Homeless Prevention Services and Rapid Re-Housing activities, and \$345,000 will be spent on Administrative activities. Funds will be distributed as Homeless Prevention Grants direct to families at risk of homelessness, to local level homeless coalitions for data collection and coordination with the twenty-eight CoC agencies, to the Council and Office on Homelessness for policy development and state agencies coordination, and as Challenge Grants to the twenty-eight CoCs throughout the state to fund any of the housing, program, or service needs included within their CoC plan.

In 2015, the State HOME Program received a total allocation of \$12,251,406 million in funding for fiscal year 2015. Of the total funding allocation, \$1,837,711 will be reserved for development that are sponsored by qualified Community Housing Development Organization (CHDO) applicants. FHFC has historically exceeded the 15 percent CHDO requirement. In the event insufficient applications meeting threshold are received to allocate this amount to rental developments, the remaining unallocated funds (including CHDO reservation amount) 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 or through direct homebuyer assistance. \$1.2 million of the total annual allocation will be used by the Florida Housing Finance Corporation HOME program for administrative costs pursuant to 24 CFR 92.207.

In 2015, the HOPWA Program received a total allocation of \$14,450,734 in funding for fiscal year 2015. Of the total funding allocation, \$5,051,589 or 97 percent of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent 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 three percent of the funding will be spent on administrative activities.

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

The Small Cities 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

**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 Florida Small Cities CDBG Program are entered into HUD's Integrated Disbursement Information System (IDIS) when awards are made, and the final accomplishments and beneficiaries are reported when the project is completed. The composite objectives of subgrantees comprise the state's overall objectives.

The Florida Small Cities CDBG Program will address three primary objectives with its federal fiscal year (FFY) 2015 allocation:

1. creating economic opportunities,
2. creating a suitable living environment, and
3. provide decent housing.

These objectives will result in four major outcomes:

1. improve the local economy,
2. reduce poverty through job creation,
3. improve neighborhoods, and
4. improving sustainability by promoting viable communities.

In preparing their CDBG applications, local communities hold public meeting to determine their local priority needs and then prepare and submit an application for funding in one of the four funding categories. Therefore specific performance objections 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 2015 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. availability of Homeless Prevention Services to persons and families at risk of Homelessness.

The HOME Program will address three primary objectives with its FFY 2015 allocation:

1. increase Rental and Homeownership Activities, through CHDOs, for persons and families at or below 80 percent AMI,
2. increase Affordable Rental Housing Activities through construction of new rental housing units for persons and families at or below 80 percent AMI, and
3. increase Affordable Ownership Housing Activities through direct financial assistance to homebuyers at or below 80 percent AMI.

The HOPWA Program will address five primary objectives with its FFY 2015 allocation:

1. provide short -term rent, mortgage and utility payments for persons with HIV/AIDS,
2. provide short-term supported housing facility assistance for persons with HIV/AIDS,
3. provide supportive services, such as healthcare and counseling, to persons with HIV/AIDS, and
4. provide tenant-based rental assistance to persons with HIV/AIDS.

**AP-40 Section 108 Loan Guarantee – 91320(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:
    - i. 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.
    - ii. Following the Department's review and acceptance of the local government's responses to the Section 108 Pre-Application Questionnaire, the local government requests a screening meeting with the Department. The meeting is held to determine if the proposed project meets all program requirements.
    - iii. 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 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(5)(b), F.A.C., with the exception that it only has to provide a project summary and draft budget at the second public hearing.
    - iv. 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-23.0041(6), F.A.C., under the "Initial Participating Party Commitments" section.
    - v. 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.

- vi. 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-23.0031, F.A.C.
  1. 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-23.0031, F.A.C. The Department shall require additional underwriting standards, criteria or review when it appears that the proposed project is not economically feasible.
  2. 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).
  3. 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.
  4. 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-23.0031, 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 such time as 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 such time as the project is administratively closed.
  - d. The local government shall meet the requirements of subsection 73C-23.0051(7), F.A.C., pertaining to audits.
  - 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)**

The Florida Small Cities CDBG program does not allocate funding resources geographically. Instead, each year a Notice of Funding Availability 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.

Allowing the local governments to establish their priority need based on the above described process is beneficial to CDBG subgrantees. It allows the Department 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 non-profit 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 non-profit recipients must consult with the CoC Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.

HOME 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. The 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 for this. The FHFC distributes HOME funds either through a Request for Applications process, a reservation system, or by demonstration.

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

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

1. Area 1: Lutheran Services Florida, Inc. Northwest (Escambia, Okaloosa, Santa Rosa, and Walton Counties)
2. Area 2A: Basic NWFL Inc. (Bay, Calhoun, Gulf, Holmes, Jackson, Washington Counties)
3. Area 2B: Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, and Wakulla Counties)
4. Area 3/13: WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee, and Union Counties)
5. Area 6: Hillsborough County Health Department (Manatee County)
6. Area 7: United Way of Brevard County, Inc. (Brevard County)
7. Area 11B: Monroe County Health Department (Monroe County)
8. Area 12: Health Planning Council of Northeast Florida, Inc. (Flagler and Volusia Counties)
9. Area 14: Polk County Health Department (Highlands, Hardee and Polk Counties)
10. Area 15: St. Lucie County Health Department (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 is the state agency responsible for the distribution of Food Stamps and

Temporary Assistance to Needy Families. 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 establish businesses in Florida and create jobs. The Small Cities 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.

HUD has hired a consultant to provide technical assistance for the Small Cities CDBG program. One of the tasks to be achieved by the consultants is to provide recommendations to increase the participation of Section 3 businesses and employees in funded projects.

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

Anti-poverty activities fall within several categories including: financial literacy, education and training, 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 who are 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, and 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 assists 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, Unemployment Insurance and Temporary Assistance to Needy Families. The Unemployment Insurance programs provides 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, HOMES, 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 – 91.320(k)(1,2,3)**

**HOME Specific Requirements**

1. Forms of Investment

Florida Housing Finance Corporation (FHFC) does not use any other forms of investment with HOME funds other than those described in 24 CFR §92.205(b).

2. Resale / Recapture

Funds 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% or less of the median income for the area); and
2. Must occupy the acquired property as the principal residence.

B. HOME-assisted units shall comply with the purchase price limitation requirements established by HUD in Part 92.254 of the HOME Rule. Eligible homebuyers can receive a 0% interest rate, deferred payment, subordinate mortgage loan. Repayment of the loan, in accordance with these recapture provisions, is expected at any time during the life of the loan should (1) the borrower sell, transfer or dispose of the assisted unit (either by sale transfer, bankruptcy or foreclosure, etc.); (2) the borrower (and, if there is one, co-borrower dies) and title to the property is transferred (3) loan maturity.

3. Description of Guidelines for Recapture

FHFC has elected to utilize option (ii) under 24 CFR 92.254(a)(5)(ii), as its method of recapturing HOME 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: down payment and 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 is 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 (1) 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. This 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.

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 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 shall require the local grantees to establish and implement the written standards required under 24 C.F.R. 576.400(e)(2). The local grantees shall establish their written standards, and submit them to the Department for review and approval. The approval by the Department is required prior to the execution of the grant agreement with the local grantee.

The Department's transfer of the responsibility to establish the written standards to the local grantee is consistent with the Florida's homeless enabling statutes. In accordance with section 420.624, Florida Statutes, the 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 2015, 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).

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Department's Limitation: For the 2014 awards, local recipients shall not use the risk factor for homeless allowed under 24 C.F.R. 576.2 related to "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 C.F.R. 5765.400(b) and (c).

- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homeless prevention assistance or rapid re-housing aid.

Department's Priority: Families with children, as well as youth exiting from state care, shall be given preference under the Department'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 over time.

Minimum Standard: In accordance with the 24 C.F.R Part 576, no participant may receive more than twenty-four (24) months of assistance in any 3-year period.

Department Standard: Local grantees shall not obligate any assistance beyond the term of the Department's grant agreement. Generally, this will limit assistance to less than 24 months under the grant agreement.

- 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 C.F.R. Part 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 twenty-eight (28) local CoC planning areas, covering sixty-four (64) of Florida's sixty-seven (67) counties.

To implement the federal requirement for continuums of care (CoC) to establish and implement a centralized or coordinated assessment system, the Department surveyed all twenty-eight (28) CoC areas as a part of its consultation process. Based on the information provided to the Department from eleven (11) of the CoC lead agencies, nine (9) CoC's report having established their coordinated assessment system. Two (2) CoC's reported that they are in the process of implementation of these systems.

The Department shall require all applicants to obtain and submit in their grant proposal, a specific certification from the designated CoC lead agency that the applying agency is using the CoC's assessment system. If the CoC has not yet developed such a coordinated assessment system in accordance with HUD requirements, the continuum lead agency shall provide written documentation of this fact. 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 the Department has not established a coordinated assessment system, 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).



UNIQUE APPENDICES

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For 2015, the Department will competitively award grants for the ESG under three grant categories.

1. Emergency Shelters
2. Street Outreach
3. Prevention and Rapid Re-Housing

The Department shall make funds available to units of local government in the state, and to private nonprofit organizations, when approved by the units of local government where grant funded activities will be carried out and serve eligible participants.

The Department will detail the grant application requirements in its grant solicitation. The Department will make the following amounts of funding available under the competitive application categories.

Emergency Shelters	\$2,186,467
Street Outreach	\$248,803
Homeless Prevention and Rapid-Re-Housing	\$2,458,516

The Department will establish maximum grant awards for each of the grant categories. The Department 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 5% 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.

Category	Maximum Grant Amount	Maximum Admin. Amount	Total Award
Emergency Shelter	\$ 75,000	\$ 3,750	\$ 78,750
HP/RR	\$ 75,000	\$ 3,750	\$ 78,750
Street Outreach	\$ 47,032	\$ 2,475	\$ 49,507

An eligible applicant shall only apply for a grant award under one (1) of the three (3) grant categories. Exception: An eligible nonprofit organization which provides homeless services in more than one CoC planning area, may submit no more than one (1) application to the Department under the solicitations for each CoC planning area they serve.

The Department shall give priority to its grant awards to applicants which shall carryout the grant funded activities in the non-formula cities and counties in the state.

The Department 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 Department 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 Department'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.

In the event that a sub-recipient of a grant from the Department does not meet the requirements for homeless participation on its policymaking body, and in staffing the activities funded by the grant, the Department 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 the Department's grant award.

Applicants seeking funding from the Department shall be governed by the requirements in 24 C.F.R. Part 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 the Department and the CoC planning lead agency to assess the performance of the Department's funded recipients under the 2015 ESG. Recipients will be required to provide copies of the Department required reports to the lead agency at the same time the report is due to the Department.

Emergency Shelter Recipients

Performance Goals:

1. Reduction in the unsheltered homeless population of the CoC area.
2. Reduction in the recipients' average length of time stayed for clients served in the shelter.
3. Percentage of persons exiting the shelter who transition to permanent housing.
4. Percentage of persons exiting the shelter who leave with employment income.
5. Percentage of persons who exit and return to homelessness within 3 months.

Street Outreach Recipients

Performance Goals:

1. Percentage of clients assessed who are successfully placed in housing.
2. Reduction in the number of unsheltered homeless persons in the CoC.
3. Reduction in the average length of time of the person's homeless episode in the CoC area.
4. Percentage of clients assessed who were able to receive food stamp assistance.

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 thirty-five percent (35%) of the participants served remain in permanent housing 6 months following the last assistance provided under the grant.

**Grantee SF-424's and Certification(s)**

**State of Florida**

**Proposed**

**National Housing Trust Fund Allocation Plan  
for Florida**

**Including proposed Substantial Amendments  
to the State of Florida's 5-Year Consolidated Plan**

**and 2016 Annual Action Plan**

**Proposed June 28, 2016**

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**Appendix** *(to be provided before final plan submission)*

- Citizen Participation Documents
- Summary of Public Comments Received

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## **Introduction**

### **Purpose**

The purpose of this new plan and substantial amendments to the State of Florida's 5-year Consolidated Plan and Annual Action Plan for 2016 is to include the new National Housing Trust Fund (NHTF) program as part of the suite of now five federal programs administered by the State of Florida.

### **Overview**

The new NHTF program, which will be administered by Florida Housing Finance Corporation, is added to the four others covered in the Consolidated Plan, which are: the Community Development Block Grant (CDBG) program, administered by the Florida Department of Economic Opportunity (DEO); the Emergency Solutions Grant (ESG), administered by the Florida Department of Children and Families; the Housing Opportunities for Persons with AIDS (HOPWA) program, administered by the Florida Department of Health; and the HOME Investment Partnerships (HOME) program, also administered by Florida Housing Finance Corporation.

### **The National Housing Trust Fund Program**

The NHTF program was established under Title 1 of the Housing and Economic Recovery Act of 2008 as a block grant to the states. Funding for the program comes from a small percentage of new business generated by Fannie Mae and Freddie Mac. Funding for the program was suspended during the recession, but starting in 2015, these two entities were directed to begin setting aside funds for this purpose. Each year the funds will be turned over to HUD, which is the federal administrator of the program. HUD sets the allocation for each state based on a formula out of the \$173.6 million in national funding available for all states in the program. Unlike the other four programs mentioned above, which also flow to many local areas of the state, NHTF program funding will be administered at the state level only.

The broad purpose of the program is to increase and preserve the supply of rental housing for extremely low- and very low-income households. The bulk of the program is targeted toward rental housing, although up to 10 percent may be used for homeownership activities.

Each state is required to develop a new NHTF allocation plan that is then incorporated into its Consolidated Plan and associated Annual Action Plan. These existing plans provide the outline for the state's priorities and allocation approaches for the programs listed above. This document provides the proposed NHTF allocation plan and the proposed substantial amendments to the State of Florida Consolidated Plan and 2016 Annual Action Plan.

### **Citizen Participation in Development of the NHTF Allocation Plan**

The proposed plan was developed through a process of citizen engagement and participation. On February 24, 2016, Florida Housing Finance Corporation held an NHTF workshop at the Holiday Inn Westshore-Airport in Tampa to outline program requirements and initial implementation ideas. The

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workshop was well attended and Florida Housing staff received comments from developers, academics, advocates for extremely low-income households, homeless persons and persons with disabilities, local government officials, providers of supportive housing and services, and concerned citizens. Staff from the Florida Department of Economic Opportunity (DEO) were also in attendance. Notice of the workshop was published in the Florida Administrative Register, posted to the Florida Housing Finance Corporation website, and emailed to the following stakeholder groups: developers, local housing officials, and special needs and homeless housing and service providers, as well as low-income and disability advocates.

On April 28, 2016, Florida Housing held another workshop to answer questions and receive comments on the draft NHTF allocation plan, which was made available for public review before the meeting. The workshop was held at Florida Housing's offices in Tallahassee and also was available by teleconference. Notice of the workshop was posted on April 8, 2016, to the Florida Housing website, emailed to the individuals listed above and published in the Florida Administrative Register.

These workshops were held before HUD released the state NHTF allocation amounts, which were released on May 5, 2016. This document provides the final, proposed allocation plan and associated substantial amendments to the state's Consolidated Plan and Annual Action Plan.

On June 28, 2016, the state announced the commencement of a final 30-day public review and comment period, ending with a telephonic public hearing to be held on July 28, 2016. To assist the public in its review of the proposed allocation plan and associated substantial amendments, the State of Florida Consolidated Plan and Annual Action Plan are posted on DEO's website:

- Consolidated Plan: click [here](#) or go to <http://www.floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/community-development-block-grant-program/state-of-florida-consolidated-plan>; and
- 2016 Annual Action Plan: click [here](#) or go to <http://www.floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/florida-small-cities-community-development-block-grant-program/annual-action-plan>.

For more information about the public hearing, please go to Florida Housing Finance Corporation's website at [www.FloridaHousing.org](http://www.FloridaHousing.org) and click on the National Housing Trust Fund link under "Current Events."

For more information on the proposed plan or hearing, please contact Nancy Muller at [nancy.muller@floridahousing.org](mailto:nancy.muller@floridahousing.org) or Nicole Gibson at [nicole.gibson@floridahousing.org](mailto:nicole.gibson@floridahousing.org), or call them at (850) 488-4197.

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## National Housing Trust Fund Allocation Plan for Florida

### **Florida's FY 2016 HTF Allocation Amount: \$4,598,821**

#### **Introduction**

The National Housing Trust Fund (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.<sup>1</sup> 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 2016, the total amount of funds available for the national trust fund is \$173.6 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 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.

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 near the Supplemental Security Income (also known as SSI) level<sup>2</sup> and that are:
- Persons with special needs, defined in [Florida Statute](#) at 420.0004(13); or

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<sup>1</sup> 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.

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



- 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 Florida Housing Finance Corporation'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 general occupancy affordable housing properties. These are properties that serve family and elderly households with a range of incomes up to 60 percent of area median income in most cases.<sup>3</sup> 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 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.

#### **NHTF Funding Priorities - § 91.320(k)(5)(i) and Recipient Application Requirements - § 91.320(k)(5)(ii)**

The state of Florida will distribute NHTF funds by selecting applications submitted by eligible recipients on a competitive basis through Florida Housing Finance Corporation's Request for Applications (RFA) process. Funds will be made available in tandem with other financing geographically across Large, Medium and Small counties over a period of three to five years.<sup>4</sup> These RFAs will make financing available directly to recipients submitting applications to develop rental developments that meet the criteria outlined in this allocation plan, more specific criteria described in each RFA, and criteria required by federal and state statute and rules governing other programs included in the RFA. These RFAs will be

<sup>3</sup> "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.

<sup>4</sup> 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.

part of a comprehensive annual funding plan that is adopted by Florida Housing Finance Corporation's Board of Directors to distribute financing across geographic areas of the state based on the need for rental housing in each area.

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 threshold criteria must be met by all applicants:

- 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;
- 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 as a whole 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; and
- The applicant must show via its developer experience its ability to obligate NHTF funds and 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.

In addition to applicable rules, statutes and RFA criteria, applications for funding submitted by eligible applicants will be reviewed according to the following 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; and
- The extent to which a proposed development has federal, state or local project based rental assistance.

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:

- Certify to Florida Housing Finance Corporation 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 financial capacity to undertake, comply with and manage the eligible activity;
- Have experience and capacity to conduct eligible NHTF activities by demonstrating ability to own, construct, manage and operate an affordable multifamily rental housing;
- 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; and

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- Explain their understanding and management practices related to leasing to homeless households or persons with special needs.

**Other Selection Criteria.** Florida Housing Finance Corporation shall give funding preference to applicants that 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 RFAs that offer NHTF funding, a preference will be specified for applicants that commit to develop Tenant Selection Plans that include, at a minimum, income and credit strategies specified by Florida Housing Finance Corporation that recognize 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.

Applicants for NHTF funding will be incentivized to include accessible and green features in their developments, and proximity to public transit and other amenities such as grocery stores will be scoring factors, with developments closer to such amenities generally receiving more favorable scoring. These criteria, in addition to the criteria above, have all been deemed of equal relative importance; that is, if an applicant does not meet these criteria, they will not receive funding.

Additional criteria may be added that is of less relative importance than the above criteria. Depending on the source of financing being offered, local government contributions and other leveraging strategies will be incorporated into RFAs. Typically, RFAs for general occupancy properties prioritize new developments that are further away from existing affordable rental properties serving the same general occupancy demographic population.

### **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 cost 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.

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**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**

<b>Construction Type</b>	<b>Miami-Dade, Broward, Palm Beach Counties</b>	<b>Monroe County</b>	<b>Remainder of Florida</b>
Garden – Wood	N/A	N/A	\$183,100
Garden – Concrete	\$236,200	\$332,400	\$215,100
Mid-Rise – Wood	N/A	N/A	\$215,100
Mid-Rise – Concrete	\$256,800	\$362,300	\$234,500
High-Rise	\$305,000	N/A	\$280,100

**Maximum Subsidy Limits for 2 Bedroom Units – New Construction Only**

<b>Construction Type</b>	<b>Miami-Dade, Broward, Palm Beach Counties</b>	<b>Monroe County</b>	<b>Remainder of Florida</b>
Garden – Wood	N/A	N/A	\$211,000
Garden – Concrete	\$271,700	\$384,000	\$248,600
Mid-Rise – Wood	N/A	N/A	\$248,600
Mid-Rise – Concrete	\$295,900	\$419,200	\$271,500
High-Rise	\$352,700	N/A	\$325,100

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. Florida Housing Finance Corporation 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 Florida Housing Finance Corporation 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. Florida Housing Finance Corporation may specify lower NHTF maximum limits in specific RFAs.

## Proposed Substantial Amendments to the Consolidated Plan

### ES-05 Executive Summary: § 91.320(b)

1. **Introduction**, page 1, is amended to add: The Florida Department of Economic Opportunity administers the Small Cities Community Development Block Grant (CDBG) program, the Florida Department of Health administers the Housing Opportunities for Persons with AIDS Grant (HOPWA) program, the Florida Department of Children and Families administers the Emergency Solutions Grant (ESG) program, and the Florida Housing Finance Corporation administers the HOME Partnerships Program (HOME) and will administer the National Housing Trust Fund Program (NHTF) beginning in 2016.
2. **Summary of the objectives and outcomes identified in the Plan Needs Assessment**, page 2, is amended to add: The highest priorities for the NHTF program are:
  - production of affordable rental housing units for extremely low income residents with a preference for persons with special needs, and persons who are homeless or are at-risk of homelessness.
3. **Evaluation of Past Performance**, page 3, is amended to add: As NHTF is a new program being funded in 2016 for the first time, no previous performance has occurred to be evaluated.
4. **Summary of citizen participation process and consultation process**, page 5, is amended to add at the end of section 4: When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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. ANY WRITTEN COMMENTS RECEIVED WILL BE ATTACHED AFTER PUBLIC HEARING.
5. **Summary of public comments**, attached to this document to follow existing Attachments, starting on page 178; *SUMMARIES OF ALL COMMENTS WILL BE ADDED HERE AFTER PUBLIC HEARING.*
6. **Summary of comments or views not accepted and the reasons for not accepting them**, page 5, is amended to add at the end of the section: All the comments received were considered in development of the proposed NHTF Allocation Plan. TO BE FINISHED AFTER PUBLIC HEARING BASED ON RESPONSE TO COMMENTS RECEIVED.

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7. **Summary**, page 5, the sentence is amended to add: , 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. **Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**, page 7, add: NHTF Administrator, Florida, Florida Housing Finance Corporation, Nicole Gibson, nicole.gibson@floridahousing.org

**PR-15 Citizen Participation: § 91.115 and § 91.300(c)**

1. **Summary of citizen participation process/Efforts made to broaden citizen participation**, page 13, add to the Public Comment section referenced here: When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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.

**SP-10 Geographic Priorities: § 91.315(a)(1)**

1. **Table 51**, pages 86-87, revise per underlined/strikethrough words:
  - **“Identify the neighborhood boundaries for this target area” section:** FHFC works with both the public and private sector throughout the state to assist in determining the affordable housing needs that can be served through the HOME, NHTF and other housing programs.
  - **“Include specific housing and commercial characteristics of this target area” section:** HOME and NHTF are ~~is~~ statewide, and the characteristics of local areas where HOME and NHTF might be used are wide ranging.
  - **“What are the opportunities for improvement in this target area?” section:** For affordable housing funding through the HOME and NHTF programs, the opportunities are simply to assist in financing more housing and access to housing, including more housing for extremely low-income households.
  - **“Are there barriers to improvement in this target area?” section:** For affordable housing through the HOME and NHTF programs, the most important barrier is having enough funding to meet the need.

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2. **General Allocation Priorities**, page 89, add to the section end: NHTF program funds will be made available in tandem with other financing as part of a comprehensive annual funding plan that is 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. NHTF funding will be made available across 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 3-5 years to ensure geographic distribution and to respond to rental needs studies carried out by and for FHFC.

**SP-25 Priority Needs: § 91.315(a)(2)**

1. **Table 52, #9 Priority Need Name: Affordable Rental Housing, Population**, page 95, add:
  - Persons and Families that are Homeless or At Risk of Homelessness
  - Persons with Special Needs
2. **Narrative**, add the following to the Unique Appendices, SP-25 section starting on page 187: Based on need studies, FHFC's supportive housing strategy developed in concert with stakeholders and legislative direction over ten years, as well as the public workshops held before and as the NHTF allocation plan was developed, there is a high need for units that are affordable to extremely low income persons, particularly those with incomes at the Supplemental Security Income (SSI) level. These households have limited access to decent, affordable housing, and few new units of housing or rental assistance affordable to these residents are being made available with current program resources. 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. These households have limited access to decent, affordable housing, and few new units of housing or rental assistance affordable to these residents are being made available with current program resources. In a June 2016 evaluation of resident incomes served throughout Florida Housing Finance Corporation'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. In particular, there is a need for units to serve persons and families at this income level who have special needs or who are homeless or at risk of homeless and need access to supportive services along with the housing to help them live independently in their communities. Thus, an additional priority is to provide housing units for these households integrated into general occupancy affordable housing properties (i.e., properties that serve family and elderly households with a range of incomes up to 60 percent of area median income in most cases) to provide opportunities for residents at this income level to live integrated in their communities.



Although the number of units developed for these households will change over the five-year planning period based on funding, the focus of this housing will remain the same.

- Annual Affordable Rental Housing Goals
  - Production of new units: 66 units
- Annual Affordable Housing Goals
  - Rental units constructed: 66 units

**SP-30 Influence of Market Conditions: § 93.315(b)**

1. **Table 53, New Unit Production section**, page 99, add: Local land use policies and jurisdiction comprehensive planning goals that support the development of accessible multifamily housing stock for lower income renters, including those with incomes at SSI levels, persons with disabilities and their families, persons and families that are homeless, and those at risk of homelessness; and that support an integrated housing approach to allow persons and families that need supportive services to live integrated in their communities.

**SP-35 Anticipated Resources: § 91.315(a)(4); § 91.320(c)(1) and (2)**

1. **Introduction**, add the following to the Unique Appendices, SP-30 section starting on page 188: For fiscal year 2016, the state NHTF Program will receive a total allocation of \$4,598,821. All of this funding (minus 10 percent for administration) will be reserved for applicants that commit to set aside a small portion of units in their developments to serve households with incomes at approximately 22 percent of area median and that are homeless, at risk of homelessness, or include an adult person with a special need. Funding will be made available in tandem with other affordable rental financing through one or more competitive Requests for Application that are based on state and federal requirements, including the NHTF program regulations.
2. **Table 54**, add to the bottom of the table a new row:  
Program: NHTF  
Source of Funds: public-federal  
Uses of Funds: New construction of affordable rental housing  
Expected Amount Available Year 1 \$: 4,598,821  
Program Income \$: 0  
Prior Year Resources \$: 0  
Total \$: 4,598,821  
Expected Amount Available on Remainder of ConPlan: 13,796,463  
Narrative Description: The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93
3. **Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**, add the following to the Unique Appendices, SP-35, at the very end of this subsection on page 191:

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National Housing Trust Fund – Provides funds to developers of affordable rental housing that construct new housing for extremely low income households. This funding can assist FHFC in creating financing opportunities with some or all of the programs listed here to enable assisted units to serve lower income residents than could be done by each program separately.

4. **Second sentence** at the top of page 103, revise: 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.

**SP-45 Goals: § 91.315(a)(4) and § 91.315 (b)(2)**

1. **Table 57, Goals Summary**, on page 108 add to the bottom of the table a new row:

Sort Order: 12

Goal Name: Affordable Rental Housing for Extremely Low Income Households

Start Year: 2016

End Year: 2019

Category: Affordable Housing

Geographic Area: STATEWIDE

Needs Addressed: Affordable Rental Housing for Extremely Low Income Households

Funding: NHTF: \$18,395,284

Goal Outcome Indicator: 66 units added to serve extremely low income households

2. **Goal Descriptions Table**, on page 110 add to the bottom of the table a new row:

12 – Goal Name: Affordable Rental Housing for Extremely Low Income Households; Goal

Description: The NHTF program has allocated \$4,598,821 from the 2016 annual funding allocation to fund affordable rental housing for extremely low income households through an 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.

**SP-80 Monitoring: § 91.330**

1. Add the following to the Unique Appendices, at the very end of section SP-80 on page 199:  
FHFC must perform onsite inspections of each NHTF-assisted project at completion, per § 93.404(d). For rental housing, the property must be inspected during the period of affordability to determine that the housing complies with the applicable property standards. Because NHTF funding will be layered with other affordable rental financing, additional more stringent monitoring requirements may also be required. The provisions below are required per NHTF regulations:
  - The onsite inspections must occur 12 months after project completion and at least once every three years thereafter during the period of affordability;

- If there are observed deficiencies for any inspected items, a follow-up onsite inspection must occur within 12 months or other reasonable timeframe established by grantee;
- Life-threatening health and safety deficiencies must be corrected immediately;
- On an annual basis, the property owner must certify to the grantee that each building is suitable for occupancy;
- Inspections must be based on a statistically valid sample of units appropriate for the size of the HTF-assisted project; and
- The grantee must verify the information submitted by project owners.

## Proposed Substantial Amendments to the 2016 Annual Action Plan

### AP-05 Executive Summary: § 91.320(b)

- 1. Introduction**, first paragraph on page 1, revise the following sentence: The Florida Department of Economic Opportunity administers the Small Cities Community Development Block Grant (CDBG) program, the Florida Department of Health administers the Housing Opportunities for Persons with AIDS Grant (HOPWA) program, the Florida Department of Children and Families administers the Emergency Solutions Grant (ESG) program, and the Florida Housing Finance Corporation administers the HOME Partnerships Program (HOME) and the National Housing Trust Fund (NHTF) Program.
- 2. Summarize the objectives and outcomes identified in the Plan**, on page 2 add to the end of this section:  
The highest priorities in the NHTF program are:
  - production of affordable rental housing for extremely low income households.
- 3. Summary of Citizen Participation Process and consultation process**, add to the bottom of this subsection: In addition, with the new NHTF program funding just coming available in mid-2016 after the proposed 2016 Plan was submitted to HUD, meetings and solicitations for public comments occurred via notices in the Florida Administrative Register; listserv email announcements; a website devoted solely to the new funding with information, workshop notices, a public comment section; and two workshops on February 24, 2016 and April 28, 2016; and the final 30-day public comment period, ending with the final public hearing on July 28, 2016.
- 2. Summary of public comments**, *TO BE PROVIDED AFTER COMPLETION OF THE JULY 28, 2016, PUBLIC HEARING AS AN ATTACHMENT.*
- 3. Summary of comments or views not accepted and the reasons for not accepting them**, page 4, is amended to add at the end of the section: All the comments received were considered in development of the proposed NHTF Allocation Plan. TO BE COMPLETED BASED ON COMMENTS RECEIVED AT PUBLIC HEARING.
- 4. Summary**, page 5, the sentence is amended to add: , 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)

- 2. Table 2 and Narrative**, page 6, add: NHTF Administrator, Florida, Florida Housing Finance Corporation, Nicole Gibson, nicole.gibson@floridahousing.org

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#### AP-10 Consultation

1. **Introduction**, add to the end of the subsection on page 7: When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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.

#### AP-12 Participation

1. **Summary of citizen participation process/Efforts made to broaden citizen participation.** **Summarize citizen participation process and how it impacted goal-setting**, revised to add a paragraph at subsection end, page 13: When HUD announced that the states would begin to receive NHTF program funds starting in 2016, Florida Housing Finance Corporation 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 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.

#### AP-15 Expected Resources: § 91.320(c)(1) and (2)

1. **Introduction**, add the following to the Unique Appendices, at the end of the subsection on page 3: In 2016, the NHTF Program will receive a total allocation of \$4,598,821 for fiscal year 2016. Ninety percent of this funding, or \$4,138,939, will be made available in tandem with other affordable rental financing through a Request for Applications process for developments that commit to provide a small portion of extremely low income units that meet NHTF program requirements. Ten percent of the total allocation, or \$459,882, will be used by Florida Housing Finance Corporation for administrative costs.
2. **Table 6**, add new row on page 17:  
Program: NHTF  
Source of Funds: public-federal  
Uses of Funds: New construction of affordable rental housing

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Expected Amount Available Year 1 \$: 4,598,821

Program Income \$: 0

Prior Year Resources \$: 0

Total \$: 4,598,821

Expected Amount Available on Remainder of ConPlan: 13,796,463

Narrative Description: The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93

3. **Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**, add the following to the Unique Appendices, at the very end of this subsection on page 3: NHTF 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 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.
4. **Last sentence** at the bottom of page 17, revise: 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.

**AP-20 Annual Goals and Objectives: § 91.320(c)(3) and (e)**

1. **Table 7, Goals Summary**, on page 21 add to the bottom of the table a new row:  
Sort Order: 12  
Goal Name: Affordable Rental Housing for Extremely Low Income Households  
Start Year: 2016  
End Year: 2020  
Category: Affordable Housing  
Geographic Area: STATEWIDE  
Needs Addressed: Affordable Rental Housing for Extremely Low Income Households  
Funding: NHTF: \$4,598,821  
Goal Outcome Indicator: 16 units added to serve extremely low income households
2. **Goal Descriptions Table**, on page 23 add to the bottom of the table a new row:  
12 – Goal Name: Affordable Rental Housing for Extremely Low Income Households; Goal Description: The NHTF program has allocated \$4,598,821 from the 2016 annual funding allocation to fund affordable rental housing for extremely low income households through an 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.

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**AP-25 Allocation Priorities: § 91.320(d)**

1. **Introduction**, page 24, first sentence revised as follows: The following chart reflects the planned percentage distribution of the FFY 2016 Small Cities CDBG program, ESG program, HOME program, NHTF Program and the HOPWA program.
2. **Table 9**, on page 24, add to the bottom of the table a new row for NHTF:  
Under the column heading Affordable Rental Housing, specify 100, and under the column heading Total (%), specify 100.
3. **Reason for Allocation Priorities**, page 24, revise the first and last sentences in this paragraph as follows:  
The percentages, described in Table ~~8~~ 9 above, place an emphasis, or priority, on the types of projects that will be funded for each of the ~~four~~ five HUD funded grant programs described in the 2015-2020 Consolidated Plan. . . . The allocation percentages, for each individual grant program, were determined based on the needs presented in the Needs Assessment section of the 2015-2020 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 based on applications received in the past.
4. **How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**, add new paragraph to the subsection end in the Unique Appendices, page 5: The NHTF Program will address one primary objective with its FFY 2016 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-30 Method of Distribution: § 91.320(d) and (k5)**

1. **Introduction**, revise first sentence on page 26 as follows: This section of the FFY 2016 Annual Action Plan describes how each annual allocation of Small Cities CDBG, ESG, HOME, NHTF, and HOPWA program funds will be distributed geographically throughout Florida.
2. **Table 10** is revised by adding a new section at the bottom of the table on page 44 as follows:  
**5. State Program Name:** National Housing Trust Fund Program  
**Funding Sources:** NHTF  
**Describe the state program addressed by the Method of Distribution:** NHTF 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.

**Describe all of the criteria that will be used to select applications and the relative importance of these criteria:**

The criteria listed below have all been deemed of equal relative importance; that is, if an applicant does not meet these criteria, they will not receive funding.

- 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 as a whole 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;
- The 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;
- The extent to which a proposed development has federal, state or local project based rental assistance.
- Certification must be made to FHFC that applicant will comply with the requirements of the NHTF program and that housing units assisted with the NHTF will comply with NHTF requirements;
- 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; and
- Commit 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;
- 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;
- Commit to meeting specified green building and accessibility standards; and
- Propose developments in locations that are proximate to public transportation options and amenities such as grocery stores and pharmacies.

**If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only):** Not applicable

**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

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**Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only):** Not applicable

**Describe how resources will be allocated among funding categories:** Ninety percent of the \$4,598,821 NHTF allocation will be used to finance affordable rental units for extremely low income households, and ten percent of the allocation will be used by FHFC for administrative costs pursuant to § 93.202.

**Describe threshold factors and grant size limits:** 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.

**What are the outcome measures expected as a result of the method of distribution?** In 2016, it is expected that the NHTF program will assist in financing construction of 16 affordable rental units to serve extremely low-income residents.

3. **Discussion**, revise the first sentence on page 45 to say: In conclusion, the distribution methods in place for each of the ~~five~~<sup>four</sup> HUD-funded grant programs described above are aligned with the current federal regulations and are standard for each annual allocation cycle.

**In addition**, add a new sentence to the end of the paragraph on page 45: 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.

### **AP-35 Projects**

1. **Introduction**, add a paragraph to the end of this subsection on page 47: NHTF developments will be selected through a statewide, Request for Application process. Eligible applicants (including non-profit 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 offer financing only 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-50 Geographic Distribution: § 91.320(f)**

- 1. Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed,** revise Unique Appendices by adding paragraph to end of subsection on page 9: 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 Florida Housing Finance Corporation’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 Requests for Applications 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 3-5 years.
- 2. Rationale for the priorities for allocating investments geographically,** add an additional paragraph on page 51 as follows: The proposed approach to allocating NHTF funds will respond to rental needs studies carried out for and by FHFC on a regular basis. While additional data is evaluated, the foundation of these studies is a detailed review of cost burden information – that is, evaluating by county how many renters at various incomes and by demographic groups are paying more than 30 percent of their income for their housing and utilities.

**AP-55 Affordable Housing: § 91.320(g)**

- 1. Introduction,** first sentence on page 52 is revised as follows: All ~~four~~ five of the federal funded grant programs, CDBG, HOME, ESG, NHTE, and HOPWA, described in the 2015-2020 Consolidated Plan have strategies to achieve affordable housing goals each year.

**In addition,** add a sentence to the end of the paragraph on page 52 as follows: The NHTF program will work in tandem with other affordable housing programs to finance new units for extremely low-income residents.

- 2. Table 14 - One Year Goals for Affordable Housing by Support Requirement,** revised on page 52 by adding an additional group as follows:

Homeless	<del>37</del> <u>70</u>
Special-Needs	<del>33</del> <u>34</u>
Total	<del>750</del> <u>816</u>

- 3. Table 15 - One Year Goals for Affordable Housing by Support Type,** revised on page 52 as follows:

The Production of New Units	<del>300</del> <u>366</u>
Total	<del>848</del> <u>914</u>

- 4. Discussion,** on page 52 revised as follows: In conclusion, affordable housing continues to be a top priority for HUD funded grant programs in the state due to the apparent need documented

state-wide for all segments of the population. All goals, objectives and strategies to expand affordable housing efforts in each of the ~~five~~<sup>four</sup> grant programs, described throughout this Annual Action Plan, align with the 2015-2020 Consolidated Plan and will be implemented in accordance to the allocation distribution methods described in the previous sections of this document.

**AP-65 Homeless and Other Special Needs Activities: § 91.320(h)**

- 1. Introduction**, on page 56 revised as follows: The Department of Children and Families, 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. The Florida Department of Health, through the HOPWA Program, provides funding for housing opportunities for persons with HIV/AIDS. 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 services providers to seek these tenants. These ~~three~~<sup>two</sup> federal funding programs described in the 2015-2020 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.
- 2. 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**, add a paragraph to the end of this subsection on page 57 as follows: Homeless persons will also be assisted to 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.
- 3. 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**, add a sentence to the end of first paragraph in this subsection on page 58 as follows: 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.

**AP-75 Barriers to Affordable Housing: § 91.320(i)** - No edits proposed.

**AP-85 Other Actions: § 91.320(j)**

- 1. Introduction**, page 60, revised as follows: 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.
- 2. Actions planned to foster and maintain affordable housing**, revised on page 62 to add the following at the subsection end: The goal of the state NHTF program is be used in tandem with other affordable financing to add new units to the supply of decent, affordable rental units in Florida.
- 3. Actions planned to enhance coordination between public and private housing and social service agencies**, page 63, revised as follows: ~~No actions are planned to enhance coordination between public and private housing and social service agencies.~~ Through the state's existing "Link Strategy," developers receiving financing 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 funding will also be required to implement this approach, with the addition of those at risk of homelessness being able to be served. Florida Housing Finance Corporation is working with other state agencies to implement this strategy.


**Appendix**

*The final document submitted to HUD will include a summary of public comments received.*

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Charged/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Florida Housing Finance Corporation"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="39-3451366"/>	* c. Organizational DUNS: <input type="text" value="8093964500000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="227 North Bronough Street"/>	Street2: <input type="text" value="Suite 5000"/>	
* City: <input type="text" value="Tallahassee"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="FL: Florida"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="32301-1329"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Nicole"/>	Middle Name: <input type="text"/>
* Last Name: <input type="text" value="Gibson"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Assistant Director of Homeownership Programs"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="850-488-4197"/>	Fax Number: <input type="text" value="850-488-9033"/>	
* Email: <input type="text" value="nicole.gibson@floridahousing.org"/>		

Application for Federal Assistance SF-424			
* 9. Type of Applicant 1: Select Applicant Type:			
<input type="text" value="A: State Government"/>			
Type of Applicant 2: Select Applicant Type:			
<input type="text"/>			
Type of Applicant 3: Select Applicant Type:			
<input type="text"/>			
* Other (specify):			
<input type="text"/>			
* 10. Name of Federal Agency:			
<input type="text" value="United States Department of Housing and Urban Development"/>			
11. Catalog of Federal Domestic Assistance Number:			
<input type="text" value="14.275"/>			
CFDA Title:			
<input type="text" value="Housing Trust Fund"/>			
* 12. Funding Opportunity Number:			
<input type="text"/>			
* Title:			
<input type="text"/>			
13. Competition Identification Number:			
<input type="text"/>			
Title:			
<input type="text"/>			
14. Areas Affected by Project (Cities, Counties, States, etc.):			
<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project:			
<input type="text" value="Production of affordable rental housing units for extremely low income residents."/>			
Attach supporting documents as specified in agency instructions.			
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>	



Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="FL"/>	* b. Program/Project: <input type="text" value="ITF"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="10/01/2016"/>	* b. End Date: <input type="text" value="09/30/2017"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="4,598,321.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,598,321.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b>	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Stephen"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Auger"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director"/>	
* Telephone Number: <input type="text" value="850 488 4197"/>	Fax Number: <input type="text" value="850 488 9809"/>
* Email: <input type="text" value="Steve.Auger@FloridaHousing.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8/11/16"/>



## Appendix - Alternate/Local Data Sources

<b>1</b>	<p><b>Data Source Name</b></p> <p>2009-2013 ACS Workers</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>American Community Survey (ACS), United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Summary of demographics, housing market characteristics, affordable housing needs and housing stock characteristics for individual counties and cities and a statewide summary.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The data provides a single database for statewide and local housing information in Florida.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>The various data sources include yearly values from 2009 to 2013 and 1996-2014, and 2013 and 2014 single year information.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>See the methodologies discussions for the 2009-2013 American Community Survey data, Bureau of Economic and Business Resource (University of Florida), and General Unit Characteristics' references. U.S. Census information was also used, which is an accepted HUD default data.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>See discussions for the data sources referenced above.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>See discussions for the data sources referenced above.</p>
<b>2</b>	<p><b>Data Source Name</b></p> <p>Bureau of Economic and Business Research</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Bureau of Economic and Business Research, University of Florida</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Population estimates and projections for cities and counties in Florida and statewide. Population estimates are provided for 2014 and population projections in five year increments from 2015 to 2040 by age, sex, race, and Hispanic origin.</p>

	<p><b>What was the purpose for developing this data set?</b></p> <p>The Bureau of Economic and Business Research produces the state’s official state and local population estimates and projections. The estimates and projections are used for distributing state revenue-sharing dollars to cities and counties in Florida and for budgeting, planning, policy analysis by state and local governmental agencies and use by any other entities that need population estimates and projections.</p> <p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2014</p> <p><b>Briefly describe the methodology for the data collection.</b></p> <p>The methodologies used are described on the Bureau of Economic and Business Research website at <a href="https://www.bebr.ufl.edu/population/methodology/projections-of-total-population">https://www.bebr.ufl.edu/population/methodology/projections-of-total-population</a>.</p> <p><b>Describe the total population from which the sample was taken.</b></p> <p>Not applicable.</p> <p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Not applicable.</p>
3	<p><b>Data Source Name</b></p> <p>Point in Time Counts</p> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>CoC Point in Time Counts 2014</p> <p><b>Provide a brief summary of the data set.</b></p> <p>The data set included sheltered and unsheltered counts that included: age, gender, ethnicity, race, military status, household type, disabling conditions, episodes of homelessness, cause of homelessness, foster care information and length of homelessness.</p> <p><b>What was the purpose for developing this data set?</b></p> <p>The Department of Housing and Urban Development requires that the homeless continuums of care conduct an annual count of homeless persons who are sheltered in emergency shelters, transitional housing and safe havens on a single night during the last ten days of January. Further, HUD requires that the continuums of care also must conduct a count of the unsheltered homeless population every other year, required on odd numbered years. For 2014, the state’s 28 homeless continuums of care carried out both the sheltered and unsheltered counts as required. The Office on Homelessness PIT survey included all information that is required by HUD.</p> <p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>The data was collected in January, 2014.</p>

	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>The continuums were given the following options to collect the 2014 data:</p> <ul style="list-style-type: none"> <li>Point-in-time count with no interview</li> <li>Point-in-time with interviews</li> <li>Point-in-time plus sample interviews</li> <li>Point-in-time plus extrapolation</li> <li>Administrative data from providers of services</li> <li>Public places count</li> <li>Public places count with interviews</li> <li>Sample of interviews</li> <li>Extrapolation from Point-in-time and sample of interviews</li> <li>Public places count using probability sampling</li> <li>Service-based count for non-shelter services</li> <li>HMIS</li> <li>Other</li> </ul> <p><b>Describe the total population from which the sample was taken.</b></p> <p>The data was collected by the 28 Continuums of Care throughout the state and included a sample from the homeless populations in 51 of the 67 counties in the state.</p> <p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Please see attached spreadsheet – 2014 PIT Spreadsheet</p>
4	<p><b>Data Source Name</b></p> <p>2013-2014 Consolidated Annual Performance Report</p> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Florida Department of Health</p> <p><b>Provide a brief summary of the data set.</b></p> <p>The data is included in the State of Florida Consolidated Annual Performance and Evaluation Report for Federal Fiscal Year 2012. The data identifies the number of housing units designated or available for people with HIV/AIDS and their family.</p> <p><b>What was the purpose for developing this data set?</b></p> <p>The information is required as part of the annual report that is submitted to HUD.</p>

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data includes all the tenant-based rental assistance; permanent housing facilities, transitional/short-term facilities; short-term rent, mortgage and utility assistance; and permanent housing replacement services undertaken during the operating year supported by HOPWA funds.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2012</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete.</p>
5	<p><b>Data Source Name</b></p> <p>2013 and 2015 Housing Demographic Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Florida Housing Data Clearinghouse, University of Florida</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The 2013 and 2015 projections of cost burden on households with an income less than 80 percent of the area median income was generated from tenure, household income, and cost burden data on the Clearinghouse website.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The data provides a single database for statewide and local housing information in Florida.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2009-2013</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>The U.S. Census Bureau data for 2000 and 2010 and population projections prepared by the Bureau of Economic and Business Research, University of Florida.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>The Census information is an approved HUD data source. See the Bureau of Economic and Business Research data source reference.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>The Census information is an approved HUD data source. See the Bureau of Economic and Business Research data source reference.</p>

<b>6</b>	<p><b>Data Source Name</b></p> <p>2013 Rental Market Study: Special Needs Households</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Shimberg Center for Housing Studies at the University of Florida</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The data set includes information on cost burdened renter households and persons with disabilities receiving benefits (Social Security, Supplemental Security Income, or veteran’s benefits related to disability), survivors of domestic violence, and youth aging out of foster care.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The purpose for the report was to determine the number of special needs populations based on Florida’s definition of special needs in Section 420.0004(13), Florida Statutes.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>See the sources of information used in this report in the methodology section below.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Data sources included: 1) 2011 American Community Survey and Bureau of Economic and Business Research, University of Florida, 2012 Florida population projections for disability-related benefits and disability-related benefits in group quarters, 2) Florida Department of Children and Families’ Annual Report 2011-2012 for survivors of domestic violence, 3) Florida Department of Children and Families, June 2012, for youth aging out of foster care based on youth eligible for Florida’s Road to Independence program, and 4) U.S. Department of Housing and Urban Development, <i>2012 Annual Homeless Assessment Report</i> for homeless persons with severe mental illness and homeless persons with chronic substance abuse.</p> <p>Data for low-income renter households with persons with severe disabilities (receiving no benefits) and low-income owner households, adult children with severe disabilities (any benefit status) came from the Census national Survey of Income and Program Participation information (2008), 2011 American Community Survey, and Bureau of Economic and Business Research, University of Florida, 2012 Florida population projections.</p> <p>Florida Agency for Persons with Disabilities, Quarterly Report, October 2012 for development disabilities; Florida Department of Elder Affairs, 2013 Summary of Programs and Services for persons in the Florida Long Term Car Community Diversion pilot program; Office of Program Policy Analysis and Government Accountability, Report No. 12-13, December 2012, for persons receiving Aging and Disability Medicaid waivers (OPPGA is an office of the Florida Legislature. According to its website, it “provides data, evaluative research, and objective analyses to assist legislative budget and policy deliberations”); Florida Department of Children and Families, January 2013 data on persons receiving services for severe and persistent mental illness form the Department of Children and Families.</p>

**Describe the total population from which the sample was taken.**

- 1) Renter households with persons with disabilities receiving benefits: 93,438 cost burdened;
- 2) Survivors of domestic violence: 42 certified domestic violence centers provide emergency shelter to 15,997 individuals from 8,419 households;
- 3) Youth ageing out of foster care: 5,052 young people eligible for the Road to Independence program, but only 2,091 are receiving benefits from the program;
- 4) Disabled-relate benefits in group quarters: 24,073 persons;
- 5) Homeless persons with severe mental illness: 7,750;
- 6) Homeless persons with chronic substance abuse: 7,929;
- 7) Low-income cost burdened renter households with persons with severe disabilities (no benefits): 42,186;
- 8) Low-income cost burdened owner households, adult children with severe disabilities (any benefit status): 36,706;
- 9) Adults with development disabilities: 51,116;
- 10) Persons 65 and older who are part of Florida’s Long Term Care Community Diversion Pilot (individuals that can be safely served at home with community-based services): 23,657;
- 11) Persons receiving Aging and Disabled Adult Medicaid waivers (adults ag 18-64 with disabilities or frail elders age 65 or older who receive home- and community-based services): 30,936; and
- 12) Persons 18 or older receiving services for severe and persistent mental illness from the Department of Children and Families.

**Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.**

Disabled, low-income cost burdened, elderly, victims of domestic violence (women, children and men), ages 18 to 65 and older for some data.