DRAFT: FOR REVIEW ONLY



Community Services Department Community Development Division

FY 2022-2023 One-Year Action Plan

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Executive Summary

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

1. Introduction

Seminole County is an entitlement community that receives annual allocations of funding from the US Department of Housing and Urban Development (HUD). As such, Seminole County prepares strategic and annual action plans to identify the community needs and priorities for use of Federal grants aimed to improve communities throughout Seminole County. The 2020-2024 Consolidated Plan was approved February 23, 2021, and identified high priority needs related to increasing access to affordable housing, increasing access to public services, improving access to public facilities/infrastructure, increasing access to homeless prevention services; and program administration.

Annual Action Plans are developed to outline the programs and projects that will be funded and implemented each year to help meet the goals identified within the Five Year Consolidated Plan (Strategic Plan). Annual accomplishments and grant expenditures are reported in an annual performance report.

The FY2022-2023 One Year Plan identifies projects and programs that will be funded by the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grants (ESG). Seminole County has been allocated \$2,172,901 in CDBG funds, \$962,247 in HOME funds, and \$184,741 in ESG funds. In addition, \$250,000 of FY 2021-2022 HOME funds, originally allocated to purchase assistance, will be re-allocated to infrastructure development and improvement. The FY 2022-2023 Action Plan was prepared with input from the public in accordance with federal regulations. The plan seeks to implement the goals and objectives of the Consolidated Plan to benefit low and moderate-income households and individuals in Seminole County through provision of various improvements and services.

2. Summarize the objectives and outcomes identified in the Plan

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

Seminole County identified five priority needs to address during the Consolidated Plan period (2020-2024) that will benefit low- and moderate-income households and individuals in Seminole County. The

proposed activities seek to provide decent housing, create suitable living environments, or improve economic opportunities for low- and moderate-income persons. Priority needs, objectives, outcomes, and indicators projected for the 5-Year period include:

Objectives: Increase Access to Affordable Housing Increase Access to Public Services Improve Access to Public Facilities/Infrastructure Increase Access to Homeless Prevention Services Program Administration

Outcomes: availability/accessibility affordability sustainability

During the 2022-2023 Annual Action Plan period, Seminole County will be implementing the following activities/projects that will address identified objectives and outcomes:

Objectives/Outcomes: Providing Decent Housing/Affordability Acquisition/Rehabilitation for Resale Tenant Based Rental Assistance Housing Construction or Rehabilitation Create Suitable Living Environments/Availability-Accessibility Road/Sidewalks/Infrastructure/Public Facility Improvements Public Services Acquisition, Construction, Rehabilitation Emergency Shelter Operation and Maintenance and Essential Services Rapid Re-Housing

3. Evaluation of past performance

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

The County regularly monitors and evaluates its past performance to ensure meaningful progress is made toward the goals identified in its Consolidated Plan. The 2021-202 program year was the second year of the 2020-2024 Consolidated Plan. In this program year, Seminole County proposed to complete the strategies to address the five (5) high priority needs identified in the current Consolidated Plan. Those strategies included:

Increasing Access to Affordable Housing

1. Providing purchase assistance to help first-time homebuyers with the financial capacity to make monthly mortgage payments, but have limited discretionary income available to save money to cover the required down payment and closing costs to become homeowners.

2. Continuing to maintain a partnership with Habitat for Humanity to leverage HOME program funds to construct/rehabilitate six (6) units for homeownership by low-income households.

3. Continuing to fund Rapid Re-Housing that provides rental assistance to individuals at risk of being homeless.

4. Continuing to implement the Tenant-based Rental Assistance (TBRA) that provides rental assistance to seniors and those with disabilities.

Increasing Access to Public Services

1. Awarding funding to five (5) local non-profit organizations to provide programs and services to low income individuals and groups such as seniors, person with disabilities, abused children, and homeless persons or at risk of being homeless.

2. Continuing to fund and operate a program that provides dental assistance to low income individuals.

Improving Access to Public Facilities/Infrastructure

1. Providing funding for five (5) public facilities projects that promote and provide secure enhancements and building renovations for greater efficiency and addresses safety concerns.

Increasing Access to Homeless Prevention Services

- 1. Funding emergency shelter operations and essential services for the homeless
- 2. Continuing to allocate funds to operate the Rapid Re-Housing programs for individuals and families

3. Provide funding for mobile day services and street outreach for the unsheltered homeless individuals.

4. Provide funding for the HMIS system to allow funded agencies to meet reporting compliance.

Program Administration

1. Funding the administration and implementation of the HUD CDBG, HOME, and ESG programs.

Seminole County will conduct regular monitoring ot ensure the successful implementation of funded projects and activities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The FY2022-2023 One Year Action Plan identifies projects and programs that will be funded by the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grants (ESG). Seminole County is slated to receive \$2,172,901 in CDBG funds, \$962,247 in HOME funds, and \$184,741 in ESG funds. The FY2022-2023 Action Plan was prepared with input from the public in accordance with federal regulations. The plan seeks to implement the goals and objectives of the Consolidated Plan to benefit low and moderate-income households and individuals in Seminole County through provision of various improvements and services.

HUD requires input from the public regarding proposed projects and initiatives that result from the Federal funds entrusted to Seminole County. Public comment can be obtained in a variety of ways. The public is welcome to call, email, write, meet in person, and participate in public meetings/forums. All notifications regarding the Annual Action Plan are published in the Orlando Sentinel, a newspaper of general circulation, as required by Federal regulations. Seminole County also hosts public meetings and gathers feedback from stakeholders at various stages of the planning process. A public hearing is held prior to the publication of the draft annual action plan. The public is also given a 30-day comment period to offer their feedback after the draft action plan has been published. Additionally, a summary advertisement is published in the newspaper and County website. Hard copies are made available at the Community Services Offices for persons who have limited access to a computer or those who require in depth explanations of our programs and requirements. The public comment period began June 1, 2022 and ended on June 30, 2022.

Seminole County uses a request for proposal process to allow non-profit organizations to partner to implement programs that are funded through CDBG Public Services, HOME, and the Emergency Solutions Grant. Agencies were notified on February 25, 2022 about the available funding. They also participated in technical assistance workshops prior to the submittal of grant applications. Proposals were received and review by staff for eligibility after receipt, and reviewed and ranked by the Application Review Team on May 16, 2022.

Additionally, the draft 2022-2023 Action Plan was presented to the Seminole County Board of County Commissioners on July 26, 2022. The public was given an opportunity to comment prior to approval by the Commissioners.

5. Summary of public comments

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

Throughout the Notice of Funding Availability (NOFA) and Annual Action Plan development, Seminole County published notices in the Orlando Sentinel, a publication of general circulation to inform the

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community of the available funding, the draft action plan, and the public hearing to approve the draft plan. On February 28 and March 7, 2022 Seminole County hosted public meetings via Zoom Conference, due to social distancing restrictions to present the NOFA, discuss each funding source and how to apply for funding; in addition to fielding questions from participating organizations on eligible activities and the application submission process. All questions and comments presented during the Zoom meetings and throughout the application phase were accepted and addressed.

Prior to the development of the action plan draft, on June 8, 2022 Seminole County hosted a public meeting via Zoom Conference, due to social distancing restrictions to present the plan and funding recommendations and hear any public comments. Any comments received during the conference call and throughout the public comment period will be included in the final presentation to the Board of County Commissioners for their approval.

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

All public comments and views were accepted and included in this 2022-2023 One Year Action Plan.

7. Summary

All federal programs aim to improve the quality of life in Seminole County through the effective and efficient use of Federal, State, and local resources.

There continues to be a need for public service funding, infrastructure projects and affordable housing in Seminole County. The CDBG program will fund the public services, infrastructure projects, and affordable housing, while the HOME program will be used to fund homeownership, housing rehabilitation and purchase assistance. Additionally, the ESG program will be utilized to provide assistance to the homeless through funding shelter operations and maintenance, providing essential services for emergency shelters, and Rapid Re-Housing activities.

PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

Agency Role		Name		Department/Agency
CDBG Administrator	SEMINOLE COUNTY		Seminole Co	ounty Community Services Department
HOME Administrator	SEMINOLE COUNTY		Seminole Co	ounty Community Services Department
ESG Administrator	SEMI	SEMINOLE COUNTY		ounty Community Services Department

Table 1 – Responsible Agencies

Narrative (optional)

Seminole County Community Services Department is the Lead Agency responsible for the preparation and implementation of the Consolidated Plan. The Community Development Division administers the CDBG, HOME and ESG programs. Community Services works in conjunction with Public Works, Planning/Building and other departments to implement specific projects funded by the CDBG program. Non-profit agencies are also an integral part of CDBG Public Services and ESG Homeless Services programs.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

To increase coordination with local and state agencies that are integral to the completion of the 2020-2024 Consolidated Plan, the Seminole County Community Services Department will implement the following strategies to achieve the goals and objectives outlined in the Consolidated Plan and strengthen partnerships with these agencies to ensure successful implementation of all federally funded activities.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Seminole County actively coordinates with two housing authorities including the Seminole County Housing Authority and the Sanford Housing Authority to address a multitude of needs within the County. Chief among these needs is providing affordable housing opportunities for the County's lowest income residents. It is ideal to have housing located in communities with access to job, transportation, and healthcare options. The County supports housing authority efforts, which includes the provision of social services and other supports in health and housing.

The County enhances coordination between public and private health agencies by: (a) providing operational support to regional coordinating agencies, (b) supporting collaborative partnerships in applications for public service funding, (c) requiring recipients of Emergency Solutions Grant funding to participate in the local Homeless Management Information System, and (d) coordinating, hosting, and participating in opportunities for community dialogues that are focused on identifying local needs and collaborative approaches to meeting them.

The County Community Services Department has developed and managed strong partnerships and relationships to enhance coordination between service providers. Entities participating in the process include multiple providers of services from various disciplines. These include agencies, organizations, groups with expertise in case management, life skills, alcohol and/or drug abuse, mental health, housing, public housing, employment assistance, transportation, legal, elderly, food/clothing, and domestic violence. The Seminole County Community Services Department will continue to support organizations providing these services to enhance coordination efforts with public and private housing and supportive services providers to ensure successful implementation of federal funded activities and achievement of the goals and objectives set forth in this Consolidated Plan.

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.

Seminole County consulted with the Central Florida Commission on Homelessness Continuum of Care (CoC), the responsible entity for executing the housing crisis response system within the jurisdiction of Seminole County. The County also coordinates with The Homeless Services Network (HSN) of Central Florida, the lead agency responsible for daily facilitation, financial accountability, and operational management in development of a tri-county homelessness response system. Consultation with the CoC and HSN was conducted through multiple interactions, including direct engagement with providers working in coordination with the CoC and HSN, one-on-one interaction with officials of both organizations, and at community meetings.

The Seminole County Community Services Department will continue coordination with the CoC and HSN for participation and organization of public events and volunteer services to identify and address the current needs of homeless persons residing in Seminole County. The Homeless Services Network of Central Florida receives direct funding from the State ESG program for the operation of programs that provide direct housing and supportive services to the homeless population in the region. Seminole County provides County ESG funding to HSN annually for data collection and associated costs to operate and maintain the required Homeless Information Management System (HMIS). The County anticipates providing an annual allocation ESG funding to Homeless Services Network of Central Florida over the next five fiscal years to strengthen coordination and help meet the needs of persons and families experiencing homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Seminole County Community Services Department will consult with the Homeless Services Network of Central Florida to address the needs of homeless persons in Seminole County with ESG funded activities and other supportive service programs, when funding is available. Consultation efforts include participation in public events sponsored by the Homeless Services Network of Central Florida, public advocacy representation on advisory boards or committees, and continued funding opportunities to supplement homeless supportive services with housing services and outreach efforts funded by the ESG program.

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

Table 2 – Agencies, gro	ups, organizations who participated
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1	Agency/Group/Organization	Habitat for Humanity of Seminole County and Greater Apopka, Florida, Inc		
	Agency/Group/Organization Type	Housing		
	What section of the Plan was addressed by Consultation?	 Housing Need Assessment Non-Homeless Special Needs Market Analysis Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing, public service, public facility, and economic development needs in the community from a housing provider and development perspective. As an outcome, the County will further understand the need for increased access to affordable housing for its residents, with emphasis on owner housing. 		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?			
2	Agency/Group/Organization	Florida Department of Health in Seminole County		
	Agency/Group/Organization Type	Housing		
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing, public service, public facility, and economic development needs in the community from a housing provider and development perspective. As an outcome, the County will further understand the need for increased access to affordable housing for its residents, with emphasis on owner housing.		

3	Agency/Group/Organization	FL-507 Homeless Services Network of Central FloridaServices-homelessHomeless Needs - Chronically homelessHomeless Needs - Families with childrenHomelessness Needs - VeteransHomelessness Needs - Unaccompanied youthHomelessness Strategy		
	Agency/Group/Organization Type			
	What section of the Plan was addressed by Consultation?			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing, public service, public facility, and economic development needs in the community from a housing provider and development perspective. As an outcome, the County will further understand the need for increased access to affordable housing for its residents, with emphasis on owner housing.		
4	Agency/Group/Organization	SEMINOLE COUNTY HOUSING AUTHORITY		
	Agency/Group/Organization Type	РНА		
	What section of the Plan was addressed by Consultation?	Public Housing Needs		

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via email and phone interview. Also conducted a review and discussion of planning documents for further consultation. Further, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing needs from a public housing perspective. As an outcome, the County will further understand the housing and supportive service needs of low-income persons. The County will continue to coordinate with the PHA in efforts to provide affordable housing to its low-income residents. Seminole County plans to partner with the agency to provide funding to support the construction of affordable family units on the SCHA property.
5	Agency/Group/Organization	Sanford Housing Authority
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via email and phone interview. Also conducted a review and discussion of planning documents for further consultation. Further, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing needs from a public housing perspective. As an outcome, the County will further understand the housing and supportive service needs of low-income persons. The County will continue to coordinate with the PHA in efforts to provide affordable housing to its low-income residents.
6	Agency/Group/Organization	City of Sanford
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via virtual webinar and phone interview due to COVID-19 social distancing restrictions. Also conducted a review and discussion of planning documents for further consultation. Further, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing, public service, public facility, and economic development needs in the community from a local government perspective. As an outcome, the County will further understand the housing and supportive service needs of its very-low, low, and moderate -income residents and its homeless and at-risk of becoming homeless population. The County will continue efforts to coordinate with adjacent local governments to support housing and community development efforts when possible.
7	Agency/Group/Organization	Inspire of Central Florida
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Housing Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage participation in the community needs survey. The organization provided comments on housing, public service, public facility, and economic development needs in the community from a social services perspective. As an outcome, the County will further understand the service and employment needs of persons with disabilities. The County will continue efforts to coordinate with organizations providing essential services to persons with disabilities when possible.
8	Agency/Group/Organization	Embrace Families Solutions, Inc
	Agency/Group/Organization Type	Services-Children Services-homeless
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	What section of the Plan was addressed by	Homelessness Strategy Non-Housing Community Development Strategy Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage		
	Consultation?			
	Briefly describe how the Agency/Group/Organization			
	was consulted. What are the anticipated outcomes of			
	the consultation or areas for improved coordination?	participation in the community needs survey. The organization provided		
		comments on housing, public service, public facility, and economic		
		development needs in the community from a social services perspective. As an		
		outcome, the County will further understand the housing and service needs of		
		families and children and its homeless population. The County will continue		
		efforts to coordinate with organizations providing essential services to families		
		and the homeless when possible.		
9	Agency/Group/Organization	Safe House		
	Agency/Group/Organization Type	Services-Victims of Domestic Violence		
	What section of the Plan was addressed by	Homelessness Strategy		
	Consultation?	Non-Housing Special Needs		
	Briefly describe how the Agency/Group/Organization	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In		
	was consulted. What are the anticipated outcomes of	addition, this organization was consulted by invitation to encourage		
	the consultation or areas for improved coordination?	participation in the community needs survey. The organization provided		
		comments on housing, public service, public facility, and economic		
		development needs in the community from a social services perspective. As an		
		outcome, the County will further understand the housing and service needs of		
		women, men, and children who are victims of domestic violence. The County		
		will continue efforts to coordinate with organizations providing essential		
		services to victims of domestic violence when possible.		
10	Agency/Group/Organization	Harvest Time International		
	Agency/Group/Organization Type	Services-homeless		

	Million and the Discourse different difference di difference difference difference difference difference diffe				
	What section of the Plan was addressed by	Housing Need Assessment			
	Consultation?	Market Analysis			
	Briefly describe how the Agency/Group/Organization	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In			
	was consulted. What are the anticipated outcomes of	addition, this organization was consulted by invitation to encourage			
	the consultation or areas for improved coordination?	participation in the community needs survey. The organization provided			
		comments on housing, public service, public facility, and economic			
		development needs in the community from a housing provider and			
		development perspective. As an outcome, the County will further understand			
		the need for increased access to affordable housing for its residents, with			
		emphasis on owner housing.			
11	Agency/Group/Organization	FLORIDA SPECS			
	Agency/Group/Organization Type	Housing			
	What section of the Plan was addressed by	Housing Need Assessment			
	Consultation?	Market Analysis			
	Briefly describe how the Agency/Group/Organization	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In			
	was consulted. What are the anticipated outcomes of	addition, this organization was consulted by invitation to encourage			
	the consultation or areas for improved coordination?	participation in the community needs survey. The organization provided			
		comments on housing, public service, public facility, and economic			
		development needs in the community from a development perspective. As an			
		outcome, the County will further understand the need for increased access to			
		affordable housing for its residents, with emphasis on owner housing.			
12	Agency/Group/Organization	CenterState Bank			
	Agency/Group/Organization Type	Banking Private			
		Private Sector Banking / Financing			
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy			

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Consulted via virtual webinar due to COVID-19 social distancing restrictions. In addition, this organization was consulted by invitation to encourage
the consultation or areas for improved coordination?	participation in the community needs survey. The organization provided
the consultation of areas for improved coordination?	
	comments on housing needs in the community from a lender perspective. As an
	outcome, the County will further understand the need for increased resources
	and flexible underwriting and loan terms to develop affordable housing and
	provide homeownership opportunities. The County will continue efforts to
	coordinate with lenders to support affordable housing efforts for its low-income
	residents.

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

The County endeavored to consult with all agency types and does not exclude any agencies from consultation.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?		
Central Florida Commission on		The County develops goals for homeless relative to the funding that it provides to		
Continuum of Care	Homelessness Continuum of Care	support the goals of the CoC.		
Local Housing	BCC Affordable Housing Advisory	The AHAC develops a tri-annual strategic plan that addresses how State of Florida		
Assistance Plan		funds will be allocated to address the housing needs for very low, low and		
Assistance Plan	Committee	moderate income households.		

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

HUD requires input from the public regarding proposed projects and initiatives that result from the Federal Funds entrusted to Seminole County. Public comment can be obtained in a variety of ways. The public is welcome to call, email, write, meet in person, and participate in public meetings/ forums. Meetings are held in locations that are accessible. Accommodations are made for persons with disabilities. The citizen participation plan seeks to provide ways for the community to offer comments and feedback, with focus on minorities, low and moderate-income persons countywide. All notifications regarding the Annual Action Plan are published in the Orlando Sentinel, a newspaper of general circulation, as required by Federal regulations. Seminole County also hosts public meetings at various stages of the planning process. A public hearing is held prior to the publication of the draft annual action plan. The public is also given a 30-day comment period to offer their feedback after the draft action plan has been published. Additionally, a summary advertisement is published in the newspaper and County website. Hard copies are made available at the Community Services Offices for persons who have limited access to a computer or those who require in depth explanations of our programs and requirements. The public comment period began June 1, 2022 and ended on June 30, 2022. The Citizen Participation Plan and the limited English proficiency plans are attached for reference.

Seminole County uses a request for proposal process to allow non-profit organizations to partner to implement programs that are funded through CDBG public services, HOME, and the Emergency Solutions Grant. Agencies were notified on February 25, 2022 about the available funding. Two technical assistance webinars were hosted on February 28 and March 7, 2022 to inform individuals and non-profit organizations of available funding and how to apply. A total of 30 individuals attended the Zoom training sessions. Community Development Division staff members were available throughout the proposal period to answer questions regarding how to complete the request for proposal. Proposals were received and reviewed by staff for eligibility, and were also reviewed and ranked by the Application Review Team on May 16, 2022.

Additionally the draft FY 2022-2023 Action Plan was presented to the Seminole County Board of County Commissioners on July 26, 2022. The public was given an opportunity to comment prior to approval by the Commissioners.

The Citizen Participation Plan details Seminole County's efforts to inform the community of available funds and services. It provides in specific details special outreach efforts to be undertaken to reach minority community members and persons with disabilities. The Limited English

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Proficiency Plan outlines Community Development Division's commitment to providing free interpretation and translation services when it appears and individual is unable to communicate effectively in English.

Citizen Participation Outreach

Sort O	Mode of O	Target of O	Summary of	Summary o	Summary of c	URL (If applicable)
rder	utreach	utreach	response/att	f	omments not	
			endance	comments r	accepted	
				eceived	and reasons	
				2 staff		
			Seminole	members		
			County held	attended		
			a public	and		
			hearing June	presented		
			8, 2022 via	the		
			Zoom video	activities/pr		
		Minorities	conference	ojects		
			to outline	recommend		
1	Public	Non-	the planning	er for	N/A	https://us06web.zoom.us/j/83420032211?pwd=YXAvST
1	Hearing	targeted/br	process and	funding. It	N/A	FGUzhrNFh1OGFWd1NPK3Z5QT09
		oad	obtain	was widely		
		community	feedback	advertised		
			from the	in the		
			public. Three	Orlando		
			staff	Sentinel		
			members	and the		
			were	Seminole		
			present.	County		
				website.		

2	Internet Outreach	Non- targeted/br oad community	Seminole County issued a public notice regarding the availability of the 2022- 2023 Action Plan Draft. The plan was posted to the Seminole County Community Services website on June 1, 2022.The public was encouraged to provide comments during the 30 day comment period via email, in writing, or	All comments received within the 30 day period will be included in the final plan presented to the BCC.	N/A	http://www.seminolecountyfl.gov/departments- services/community-services/
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Sort O rder	Mode of O utreach	Target of O utreach	Summary of response/att	Summary o f	Summary of c omments not	URL (If applicable)
Tuer	utieach	utreatin	-	-		
			endance	comments r	accepted	
				eceived	and reasons	
			calls to staff.			
			The			
			comment			
			period began			
			on June 1,			
			2022 and			
			ended on			
			June 30,			
			2022.			

3	Newspaper Ad	Minorities Persons with disabilities Non- targeted/br oad community	Seminole County published a notice in the Orlando Sentinel, a publication of general circulation regarding the availability of the 2022- 2023 Action Plan Draft with a summary of the activities to be funded during the plan year. The public was encouraged to provide written comment during the 30 day. The comment	Staff received (1) one comment via telephone from a community member requesting the guidelines for how to apply for County funding to provide service to low income members of the community.	All comments were accepted	http://www.seminolecountyfl.gov/departments- services/community-services/
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Sort O rder	Mode of O utreach	Target of O utreach	Summary of response/att endance	Summary o f comments r eceived	Summary of c omments not accepted and reasons	URL (If applicable)
			period ran			
			June 1-June			
			30, 2022			

4	Public Hearing	Minorities Persons with disabilities Non- targeted/br oad community	Board of County Commissione rs meeting to approve the 2022-2023 Action Plan was July 26, 2022 in the Seminole County Commission chambers. The public was given the opportunity to comment on the action plan, prior to the Commissione r's approval of the Plan. Any comments received during the meeting are	Any comments made during the public hearing will be included in the final plan submitted to HUD.	N/A	http://www.seminolecountyfl.gov/departments- services/community-services/
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Sort O rder	Mode of O utreach	Target of O utreach	Summary of response/att endance	Summary o f comments r eceived	Summary of c omments not accepted and reasons	URL (If applicable)
			included in			
			the final			
			version of			
			this plan.			

5 Ou	OOM outreach	Minorities Persons with disabilities Non- targeted/br oad community Minorities	hosted two technical assistance webinars on February 28 and March 7, 2022 to inform individuals and non- profit organizations of available funding and how to apply.	servicing LMI, minorities, and persons with disabilities. Comments received were related to allowable projects, how to complete the applications , and the submission requiremen ts. No public	All comments were accepted	https://us06web.zoom.us/j/81892909965?pwd=ckh00 DBFKzZIZ0hRMDZCQ2hRUIZqUT09 http://www.seminolecountyfl.gov/departments-
6 Ad		winorities	Funding	comments	N/A	services/community-services/

Sort O	Mode of O	Target of O	Summary of	Summary o	Summary of c	URL (If applicable)
rder	utreach	utreach	response/att	f	omments not	
			endance	comments r	accepted	
				eceived	and reasons	
		Persons	Availability	were		
		with	and request	received		
		disabilities	for	during the		
			applications	30 day		
		Non-	for CDBG	comment		
		targeted/br	public	period.		
		oad	services,			
		community	ESG, and			
			HOME			
			funding was			
			published in			
			the Orlando			
			Sentinel in			
			February 9,			
			2022.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source	Uses of Funds	Expe	ected Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	income: ذ	:Resources ذ	Ş	Available Remainder	
			, ,	Ş	Ş		of ConPlan	
							\$	
CDBG	public -	Acquisition						The annual allocation and any
	federal	Admin and Planning						program income or prior year
		Economic						resources will be allocated to
		Development						eligible CDBG Program categories
		Housing						per 24 CFR 570.200-570.207
		Public						
		Improvements						
		Public Services	2,172,901	0	0	2,172,901	4,048,057	

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Yo	ear 1	Expected	Narrative Description	
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership						The annual allocation and any program income or prior year resources will be allocated to eligible HOME program categories per 24 CFR 92	
ESG	public - federal	TBRA Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	962,247	0	250,000	1,212,247	1,182,240	The annual allocation and any program income or prior year resources will be allocated to eligible ESG program categories	
		housing	184,741	0	0	184,741	322,404		

Table 5 - Expected Resources – Priority Table

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

Annual Action Plan 2022

matching requirements will be satisfied

Seminole County has identified funding sources that can be pooled to make a greater impact within the community. Although federal, state, private, and local grant program funds and activities operate according to their own guidelines and requirements, they are frequently combined to provide a higher level of funding for housing and community development needs. For example, federal CDBG funds can be leveraged State Housing Initiatives Partnership (SHIP) program funds in order to meet needs in affordable housing. The HOME Investment Partnership program funds can also be combined with SHIP to provide assistance for qualified low- and moderate-income first-time homebuyers in the form of down-payment, principal reduction, and closing cost assistance.

Seminole County meets the required HOME match requirements by using SHIP funds as well as receiving cash match from homebuyer and CHDO contributions. Seminole County meets the ESG match requirements by using general funds.

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

In addition, Florida Statutes Section 166.0451, Disposition of municipal property for affordable housing, requires cities or counties to create an inventory list of real property with fee simple title appropriate for affordable housing. In compliance with the statute, Seminole County maintains the inventory of County-owned surplus land that are potential properties for the development of permanent affordable housing. The County may partner with nonprofit organizations that develop affordable housing for low-income households. However, the disposition of any of these properties for affordable housing is subject to the discretion of the County. Community Services will review this list during the program year to determine if any of these properties may be disposed of to support affordable housing.

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Service	2020	2024	Non-Homeless	County-	Increase Access to Public	CDBG:	Public service activities other
	Assistance			Special Needs	wide	Services	\$325,935	than Low/Moderate Income
				Non-Housing			HOME: \$0	Housing Benefit: 292 Persons
				Community			ESG: \$0	Assisted
				Development				
2	Housing Program	2020	2024	Affordable	County-	Increase Access to	CDBG:	
	Delivery			Housing	wide	Affordable Housing	\$89,627	
3	Minor Home	2020	2024	Affordable	County-	Increase Access to	CDBG:	Homeowner Housing
	Repair			Housing	wide	Affordable Housing	\$300,000	Rehabilitated: 15 Household
								Housing Unit
4	Housing	2020	2024	Affordable	County-	Increase Access to	CDBG:	Homeowner Housing
	Rehabilitation			Housing	wide	Affordable Housing	\$200,000	Rehabilitated: 2 Household
							HOME: \$0	Housing Unit
							ESG: \$0	
5	Neighborhood	2020	2024	Non-Housing	County-	Improve Access to Public	CDBG:	Public Facility or Infrastructure
	Revitalization			Community	wide	Facilities/Infrastructure	\$831,762	Activities other than
				Development			HOME: \$0	Low/Moderate Income Housing
							ESG: \$0	Benefit: 13726 Persons
								Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
6	Administration	2020	2024	Planning and	County-	Program Administration	CDBG:	
				Administration	wide		\$434 <i>,</i> 580	
							HOME:	
							\$96,224	
							ESG:	
							\$13,855	
7	Housing	2020	2024	Affordable	County-	Increase Access to	CDBG: \$0	Homeowner Housing Added:
	Construction -			Housing	wide	Affordable Housing	HOME:	15 Household Housing Unit
	Homeownership						\$700,000	
							ESG: \$0	
8	Shelter Operations	2020	2024	Homeless		Increase Access to	CDBG: \$0	Overnight/Emergency
	and Essential					Homeless Prevention	HOME: \$0	Shelter/Transitional Housing
	Services					Services	ESG:	Beds added: 640 Beds
							\$110,844	
9	Rapid Re-Housing	2020	2024	Homeless	County-	Increase Access to	CDBG: \$0	Homelessness Prevention: 24
					wide	Homeless Prevention	HOME: \$0	Persons Assisted
						Services	ESG:	
							\$45,042	
10	HMIS	2020	2024	Homeless	County-	Increase Access to	CDBG: \$0	
	Administration				wide	Homeless Prevention	HOME: \$0	
						Services	ESG:	
							\$15,000	
11	CHDO Set-Aside	2020	2024	Affordable	County-	Increase Access to	HOME:	Homeowner Housing Added: 3
				Housing	wide	Affordable Housing	\$166,022	Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Service Assistance
	Goal Description	Public service activities other than Low/Moderate Income Housing Benefit: 292 Persons Assisted
2	Goal Name	Housing Program Delivery
	Goal Description	Funds to cover program delivery costs for housing activities including construction, rehabilitation, and support of the administration and case management for the HOME TBRA program.
3	Goal Name	Minor Home Repair
	Goal Description	Homeowner Housing Rehabilitated: 15 Households Assisted
4	Goal Name	Housing Rehabilitation
	Goal Description	Homeowner Housing Rehabilitated: Up to 2 Housing Units
5	Goal Name	Neighborhood Revitalization
	Goal Description	Aspire Health Partners - Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Public Facility benefits 175 persons with developmental disabilities.
		The Sharing Center - Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Public Facility benefits 7,000 low income or homeless individuals.
		Inspire of Central Florida - Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 public facility benefits: 91 LMI Persons.
		Rescue Outreach Mission of Central Florida - Public Facility or Infrastructure Activities other than Housing: 150 LMI Persons.
		East Coast Believers Church – Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 public facility benefits: 6,200 LMI persons.

6	Goal Name	Administration
	Goal Description	Administration and implementation of the CDBG, HOME, and ESG programs. Activities include staff salaries; financial responsibility; fair housing; and preparation of HUD required documents such as the Consolidated Plan, Annual Action Plan, and CAPER.
7	Goal Name	Housing Construction - Homeownership
	Goal Description	These funds will be used to assist Habitat with constructing up to 9 new homes for home purchase. FY 2021-2022 HOME funds will assist with the infrastructure development/improvement of HOME assisted homes.
8	Goal Name	Shelter Operations and Essential Services
	Goal Description	Recovery House - Essential Services to benefit up to 240 homeless household, \$52,560 Safe House - Shelter Operations to benefit up to 400 DV, \$58,284
9	Goal Name	Rapid Re-Housing
	Goal Description	Embrace Families, Inc - Rapid Re-Housing for up to 8 Homeless Households (approx. 24 individuals)
10	Goal Name	HMIS Administration
	Goal Description	ESG funds will be used to assist in the managing and administration of the HMIS software system.
11	Goal Name	CHDO Set-Aside
	Goal Description	HOME funds will be set aside to comply with the CDHO requirement.

Projects

AP-35 Projects - 91.220(d)

Introduction

The County will undertake various projects during the 2022-2023 program year focused on providing decent affordable housing and creating a suitable living environment for residents. The County will utilize their HUD CDBG, HOME, and ESG grant allocations to carry out activities intended to address priority needs in the community and ensure the greatest impact to beneficiaries.

Projects

#	Project Name
1	2022 CDBG Administration and Planning
2	2022 Aspire Health Partners - Public Facility Project
3	2022Homeless Shelter Improvements
4	2022 Inspire Facility Improvements
5	2022 Food Services Center
6	2022 Homeless Day Center Improvements
7	2022 Housing Rehabilitation/Reconstruction
8	2022 Minor Home Repair
9	2022 Housing Program Delivery - TBRA
10	2022 Community Care for the Elderly
11	2022 Substance Abuse Treatment Program
12	2022 Mental Health Services
13	2022 Adult Day Training Scholarship Program
14	2022 Services for Homeless Youths
15	2022 Housing Construction - Homeownership
16	2022 Infrastructure Development & Improvement
17	2022 CHDO Set Aside
18	2022 HOME Administration and Planning
19	ESG22 Seminole County
20	2022 Dental Assistance

Table 7 - Project Information

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

In identifying priorities, the County uses a ranking system to determine needs as low, medium, high, or no need. In ranking needs within the community, the County takes into consideration information from

the Needs Assessment, Housing Market Analysis, citizen participation process, and agency consultation. The County assesses the amount of funding available and which activities can be funded within budget to address high priority needs. The priority ranking system is as follows:

• High Priority: Activities determined as a critical need and will be funded during the Consolidated Plan period.

• Medium Priority: Activities determined to be a moderate need and may be funded during the Consolidated Plan period as funds are available.

• Low Priority: Activities determined as a minimal need and are not expected to be funded during the Consolidated Plan period.

• No Need: Activities determined as not needed or are being addressed in a manner outside of the Consolidated Plan programs. Funding will not be provided for these activities during the Consolidated Plan period.

There are various elements that produce obstacles to meeting need within the community. Addressing all housing, homeless, and community developments needs is a difficult task due to lack of funding. The current housing market and economic environment also serve as barriers to meeting needs. Housing values have increased tremendously limiting access to affordable housing for low income persons while stagnant incomes have added to the number of families and individuals needing access to services. The County uses its CDBG, HOME, and ESG funds to the fullest extent to assist in meeting underserved needs. Leveraging efforts with public and private entities are also made to supplement federal funds and increase the resources available to address community needs.

Seminole County residents continues to feel the effects of the COVID-19 health crisis. With the rising cost of housing (rent and home purchase prices), along with the major supply chain and workforce disruptions caused global pandemic, the U. S. economy experienced a drastic increase in the rate of inflation, reaching a 40 year high of 8.5%. As a result of the severe increase in the cost of everyday goods and services, such gasoline, groceries, building materials, etc., coupled with the sharp increase in the cost of housing, there is a greater need for the programs and services funded through CDBG, HOME, and ESG grant programs.

AP-38 Project Summary

Project Summary Information

1	Project Name	2022 CDBG Administration and Planning
	Target Area	County-wide
	Goals Supported	Administration
	Needs Addressed	
	Funding	CDBG: \$434,580
	Description	Funds will be used for program administration expenses. IDIS matrix code 21A.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Activities include staff salaries; financial responsiblity; and preparation of HUD required documents such as the Consolidated Plan, Annual Action Plan, CAPER and Analysis of Impediments.
2	Project Name	2022 Aspire Health Partners - Public Facility Project
	Target Area	County-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Improve Access to Public Facilities/Infrastructure
	Funding	CDBG: \$153,442
	Description	Funds will be used to install emergency back-up power generator in the Bay House 12-bed residential program for persons with severe and persistent mental illness and Turning Point the psychosocial rehabilitation program. IDIS Matrix Code 03P, CDBG Citation 570.201(c).
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 175 designated limited clientele and considered to be low income.
	Location Description	Aspire Health Partners
	Planned Activities	Public Facility Improvements
		Annual Action Dan 29

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3	Project Name	2022Homeless Shelter Improvements
	Target Area	County-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Improve Access to Public Facilities/Infrastructure
	Funding	CDBG: \$67,500
	Description	Funds will be used to replace existing windows with hurricane impact windows in the Men and Womens facilities at the Rescue Outreach Mission in Sanford. IDIS Matrix Code 03C, CDBG Citation 570.201(c)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit over 150 homeless person designated limited clientele and considered to be low income.
	Location Description	The Rescue Outreach Mission of Central Florida
	Planned Activities	Public Facility Improvement
4	Project Name	2022 Inspire Facility Improvements
	Target Area	County-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Improve Access to Public Facilities/Infrastructure
	Funding	CDBG: \$134,500
	Description	Funds will be used to replace the sheet metal roof and leaking skylights at the Day Training Facility for Disabled Adults. IDIS Matrix Code 03B, HUD Citation 570.201 (c)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 75 persons with developmental disabilities designated limited clientele and considered to be low income.
	Location Description	Inspire of Central Florida Training Facility
	Planned Activities	Public Facilities Improvements
	Project Name	2022 Food Services Center

5	Target Area	County-wide
		,
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Improve Access to Public Facilities/Infrastructure
	Funding	CDBG: \$365,826
	Description	Funds will be used to rehabilitate the Food Service Center. Project includes the build out of the facility enclosure, installation of a walk-in refrigerator/freezer, food staging area, and pantry shelving for non- perishable goods. IDIS Matrix Code 03E, HUD Citation 570.201 (c)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will help over 6,200 persons that are condisidered very low, low, and/or moderate income.
	Location Description	East Coast Believers Church - Outreach Center
	Planned Activities	Public Facilities Improvements
6	Project Name	2022 Homeless Day Center Improvements
	Target Area	County-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Improve Access to Public Facilities/Infrastructure
	Funding	CDBG: \$110,494
	Description	Funds will be used to rehabilitate the Distribution Center. Project includes the installation of permanent shelving to provide additional secure storage space for donated goods. IDIS Matrix Code 03C, HUD Citation 570.201(c)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit over 7,000 low income and homeless persons designated limited clientel and considered to be low income.
	Location Description	The Sharing Center's Client Services Center
	Planned Activities	Public Facilities Improvements
	Project Name	2022 Housing Rehabilitation/Reconstruction

Annual Action Plan

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7	Target Area	County-wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Increase Access to Affordable Housing
	Funding	CDBG: \$200,000
	Description	Funds will be used to maintain the existing affordable housing stock through housing rehabilitation of owner-occupied housing units for LMI homeowners. The rehabilitation/reconstruction program focuses on addressing issues that affect the structural integrity and preservation of the home. IDIS Matrix Code 14A, HUD Citation 570.208 (a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 2 very-low, low, or moderate income households.
	Location Description	County Wide
	Planned Activities	Program Delivery
8	Project Name	2022 Minor Home Repair
	Target Area	County-wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Increase Access to Affordable Housing
	Funding	CDBG: \$300,000
	Description	Funds will be used to maintain the existing affordable housing stock through housing rehabilitation of owner-occupied housing units for LMI homeowners. The Minor Home Repair program assists with roof replacement, plumbing, electrical systems, HVAC, and accessibility improvements. IDIS Matrix Code 14A, HUD Citation 570.208 (a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 15 very-low, low or moderate income households.
	Location Description	County Wide

	Planned Activities	Home Repair
9	Project Name	2022 Housing Program Delivery - TBRA
	Target Area	County-wide
	Goals Supported	Housing Program Delivery
	Needs Addressed	Increase Access to Affordable Housing
	Funding	CDBG: \$89,627
	Description	Funds will be used to provide project delivery cost for housing activities. Funds also used to support the administration and case management for the HOME TBRA program. IDIS Matrix Code 06, HUD Citation 570.208 (a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 30 persons in need of TBRA assistance.
	Location Description	County Wide
	Planned Activities	Program Delivery
10	Project Name	2022 Community Care for the Elderly
	Target Area	County-wide
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$56,791
	Description	Funds will be used to provided homemaking, personal care, respite care, and companionship services to low income seniors in Seminole County. IDIS Matrix Code 05A, HUD Citation 570.208(a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 14 elderly persons designiated limited clientele and considered low income
	Location Description	Seniors First, Inc
	Planned Activities	Senior Services

11	Project Name	2022 Substance Abuse Treatment Bregram
		2022 Substance Abuse Treatment Program
	Target Area	County-wide
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$49,590
	Description	Funds will be used to provide substance abuse treatment and other intervention services for individuals in Seminole County. IDIS Matrix Code 03P, HUD Citation 570.201 (c)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist up to 171 persons that meet the household income limits for very low, low or moderate.
	Location Description	Recovery House of Central Florida, Inc
	Planned Activities	Substance Abuse Treatment
12	Project Name	2022 Mental Health Services
	Target Area	County-wide
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$42,000
	Description	Funds will be used to provide mental health counseling to children under the age of 18 who are victims of abuse and neglect and their caregivers. IDIS Matrix Code 05N, HUD CItation 570.201 (e)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit 70 very low, low and moderate income youth.
	Location Description	Kids House of Seminole County, Inc
	Planned Activities	Mental Health Services
	Project Name	2022 Adult Day Training Scholarship Program

13	Target Area	County-wide
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$66,472
	Description	Funds will be used to provide job skills training, life skills training, and employment opportunities for adults with developmental disabilities. IDIS Matrix Code 05B, HUD Citation 570.208 (a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 20 disabled persons designated limited cliente and considered to be low income.
	Location Description	Inspire of Central Florida Training Center
	Planned Activities	Adult Day Training - Disabled Adults
14	Project Name	2022 Services for Homeless Youths
	Target Area	County-wide
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$11,082
	Description	Funds will be used to provide mental health counseling to homeless youths and adults (under 25). IDIS Matrix Code 05Z, HUD Citation 570.201 (e)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 20 homeless youths designated limited clientele and considered to be low income.
	Location Description	Impower, Inc
	Planned Activities	Mental Health Counseling
15	Project Name	2022 Housing Construction - Homeownership
	Target Area	County-wide

	Goals Supported	Housing Construction - Homeownership
	Needs Addressed	
		Increase Access to Affordable Housing
	Funding	HOME: \$450,000
	Description	Funds will be used to construct single-family homes to be sold to eligible first-time homebuyers. Matrix Code 12, HUD Citation 570.208(a)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will create affordable owner housing for up to 9 very low, low or moderate income households
	Location Description	County Wide
	Planned Activities	Construction of affordable housing
16	Project Name	2022 Infrastructure Development & Improvement
	Target Area	County-wide
	Goals Supported	Housing Construction - Homeownership
	Needs Addressed	Increase Access to Affordable Housing
	Funding	HOME: \$250,000
	Description	Funds will be used for the installation of distribution lines and underground utilities for new construction single-family homeownership units in connection with HOME funds used to construct the homes. IDIS Matrix Code 11, HUD Citation 570.201 (1)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	These funds can support assisting in the construction of up to 9 new homes, used by HOME funds, for first time homebuyers that are very low or low income.
	Location Description	County Wide
	Planned Activities	Infrastructure Development and Improvement
17	Project Name	2022 CHDO Set Aside
	Target Area	County-wide
	Goals Supported	Housing Construction - Homeownership

	Needs Addressed	Increase Access to Affordable Housing
	Funding	HOME: \$166,022
	Description	Funds will be used support Community Housing Development Organizations to develop affordable housing for low/mod income first- time homebuyers. IDIS Matrix Code 12, HUD Citation 570.201 (m)
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 4 very low, low income households
	Location Description	County Wide
	Planned Activities	Housing Construction - CHDO
18	Project Name	2022 HOME Administration and Planning
	Target Area	County-wide
	Goals Supported	Administration
	Needs Addressed	Program Administration
	Funding	HOME: \$96,224
	Description	Funds will be used for the implementation and administration of the HUD HOME Program. IDIS Matrix Code 21A.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Program Administration
19	Project Name	ESG22 Seminole County
	Target Area	County-wide
	Goals Supported	Shelter Operations and Essential Services Rapid Re-Housing HMIS Administration Administration

	Needs Addressed	Increase Access to Public Services
		Increase Access to Homeless Prevention Services
		Program Administration
	Funding	:
	Description	Shelter Operations and Essential Services - \$110,844. Recovery House \$52,560 = National Objective is Low/Mod Limited Clientele, HUD Citation 570.201 (e), IDIS Matrix Code 05F. Safe House \$58,284 = National Objective is Low/Mod Limited Clientele, HUD Citation 570.208 (a), IDIS Matrix Code 05G. Rapid Re-Housing - \$45,042 Embrace Families = National Objective is Low/Mod Limited Clientele, HUD Citation is 570.208 (a)(2), IDIS Matrix Code 06.HMIS Administration \$15,000 = IDIS Matrix Code 21A.ESG Administration \$13,855 = IDIS Matrix Code 21A
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	These projects will benefit 640 persons experiencing homelessness or at-risk of becoming homeless, and benefit 8 households (about 24 individuals) experiencing homelessness or at-risk of becoming homeless.
	Location Description	County Wide
	Planned Activities	Operations and Management of ESG Program, Rental Assistance. Activities include staff salaries; financial responsibility; and preparation of HUD required decouments such as the Consolidated Plan, Annual Action Plan, CAPER, and Analysis of Impediments.
20	Project Name	2022 Dental Assistance
	Target Area	
	Goals Supported	Public Service Assistance
	Needs Addressed	Increase Access to Public Services
	Funding	CDBG: \$100,000
	Description	Funds will be used to provide dental cost assistance to low/moderate income Seminole County residents. IDIS Matrix Code 05M, HUD Citation 570.201 (e)
	Target Date	9/30/2023

Estimate the number and type of families that will benefit from the proposed activities	This project will benefit up to 50 extremely low, very low, low and moderate income persons.
Location Description	County Wide
Planned Activities	Dental Hygiene

AP-50 Geographic Distribution – 91.220(f)

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

The County's federal grant funded programs for affordable housing, public services, and public facilities are available Countywide. The County promotes these programs to residents, businesses, and non-profit organizations that reside in or provide services to designated low-income target areas. Housing programs are concentrated on scattered sites throughout the County. The priority community development needs and public service locations will be Countywide. The County has designated census tracts and block groups that qualify as low- and moderate-income per HUD regulations. If the County funds projects that must meet the low-moderate income area benefit criteria, they will be in the qualified census tracts and block groups.

The primary distribution of the population benefiting from the grant assistance programs will be Countywide, and in most cases extremely low, low, and moderate-income. Beneficiaries will also include elderly, youth, persons with disabilities, and the homeless or at-risk of becoming homeless.

Geographic Distribution

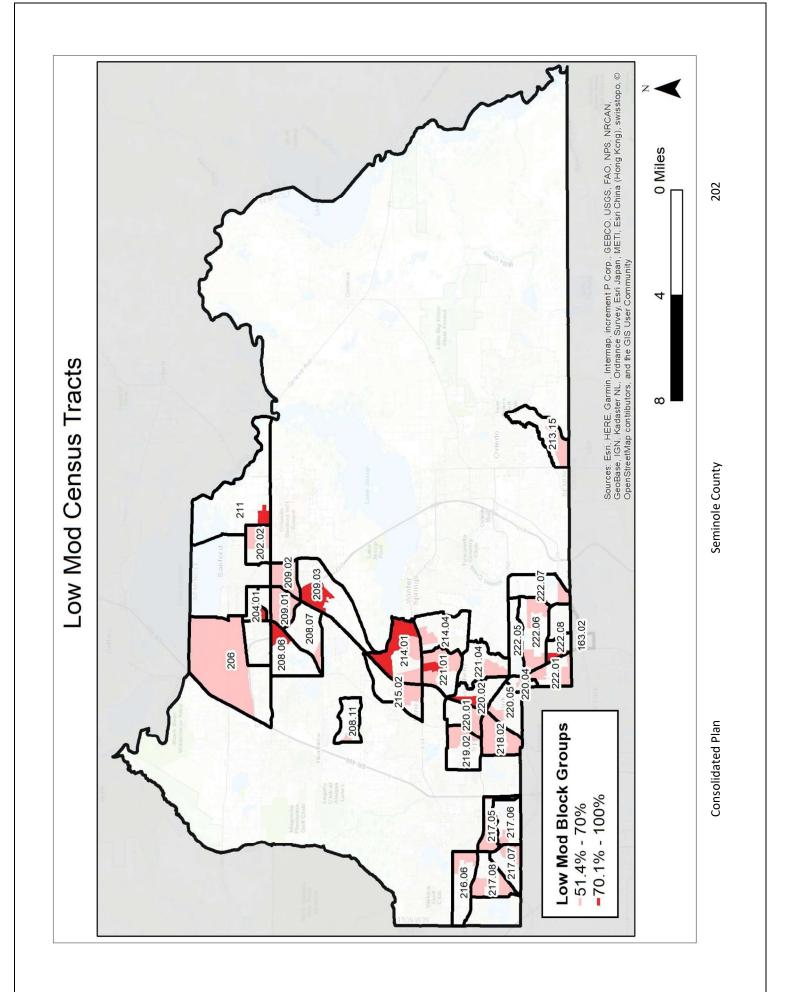
Target Area	Percentage of Funds
County-wide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The needs assessment, market analysis, and community meetings determined that various areas throughout the County suffer from a lack of affordable housing and that homeless and special needs populations require public/social services to reduce poverty. The County adheres to all program-specific eligibility requirements when allocating funds. Funds are allocated on a priority need basis in neighborhoods that demonstrate compliance with HUD's low- to moderate-income criteria. The map on the following page identifies LMI census block groups that are included in Seminole County's geographical target area.

Discussion



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

In FY2022-23, Seminole County will support affordable housing through its CDBG, HOME, and ESG programs. Funding will be provided to support activities to include minor home repairs, new construction of homeownership and rental units, direct financial assistance to homeowners, and rapid re-housing.

One Year Goals for the Number of Households to be Supported	
Homeless	8
Non-Homeless	60
Special-Needs	0
Total	68

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	38
The Production of New Units	9
Rehab of Existing Units	16
Acquisition of Existing Units	0
Total	63

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Seminole County anticipates using HOME funds to produce up to 9 new homeownership affordable housing units during the 2022-2023 fiscal year. The affordable housing units will be targeted to low-moderate income persons and families, including special needs population. CDBG funds will be used to provide minor home repairs for 12 LMI homeowners, with an additional 4 LMI homeowners receiving assistance to complete major rehab to their homes. Six homeless households will be assisted with ESG Rapid Re-Housing activity funds to reduce homelessness.

The Tenant Based Rental Assistance (TBRA) program through HOME will provide subsidized rental assistance for up to 30 families annually.

AP-60 Public Housing – 91.220(h)

Introduction

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

In 2020, Seminole County voted to approve providing local contribution for the Villas at Academy Place tax credit application. The Villas of Academy Place is a Seminole County Housing Authority property. The Board voted to allocate \$230,000 in HOME funds over the course of two years for the local contribution needed for a LIHTC application. To meet this obligation, Seminole County set aside the remaining \$230,000 in HOME funds in 2021 to provide the local contribution for the tax credit properties. SCHA continues to pursue a tax credit award, but \$250,000 has been pulled back from this project and will be re-allocated to construction – Homeownership. SCHA will be eligible to re-apply for HOME funds when the agency re-applies for the tax credit project. The 2021 allocation will remain available to support the project.

In addition to the Villas of Academy Place project, Seminole County partners with the SCHA to administer the HOME Tenant Based Rental Assistance (TBRA) program. Under the TBRA program funds will be used to provide tenant based rental assistance to elderly, disabled, or homeless. For the 2022-2023 program year HOME funds are not being allocated for the TBRA program. However, TBRA program will continue by using prior year funding to support the program in 2022-2023.

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

The SCHA provides supportive services to its residents to work towards self-sufficiency and homeownership. Supportive services include job training, financial counseling, and networking with housing providers. The supportive services are offered to all public housing residents as an incentive to take control of their housing opportunities and to improve their living conditions.

The SHA has established a goal to increase homeownership opportunities in the Goldsboro neighborhood. During PY 2020-2024, SHA plans to construct 80-100 for-sale units on the southern parcel of the former Castle Brewer Court and William Clark Court public housing sites. These homeownership units will be a mixture of market-rate and affordable homes.

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

provided or other assistance

Not Applicable

Discussion

The SCHA will continue to administer direct annual HUD funding allocations on the operation, maintenance, and rental assistance projects and activities based on the amount of the allocation and the number of qualified individuals and families in need of public housing assistance.

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

Introduction

Focused on addressing the needs of persons experiencing homelessness and other categories of persons with special needs, strategies in this section will be implemented by the County. This collaborative effort will incorporate selected housing providers to provide specific direct services to the target populations. The following sections will address the methods of outreach to homeless persons, activities to address the emergency shelter and transitional housing needs of homeless persons, actions to assist homeless persons with obtaining permanent housing, and efforts to prevent homelessness in to reduce and end homelessness throughout Seminole County.

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 Homeless Services Network of Central Florida serves as the Continuum of Care (CoC) Lead Agency within the jurisdiction. Seminole County relies on the partnership with the CoC and its network providers to provide Street Outreach services and conduct the annual Point-in-Time Count (PIT Count). These activities help the CoC and Seminole County Government guide funding to development and implementation of programs that prevent and end sheltered and unsheltered homelessness.

In addition, Seminole County Community Services Department partners with Embrace Families to administer rapid re-housing activities, including case management and assessment through the ESG RRH Program and anticipates continuing to do so during the 2022-2023 fiscal year. The project is included in the FY 2022-2023 Action Plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

Seminole County uses Emergency Solutions Grant (ESG) funding to support the needs of persons experiencing homelessness residing in emergency shelters or site-based transitional housing programs. Consolidated Plan goals for 2020-2024 include serving 3,950 persons experiencing homelessness through overnight shelter. A total of \$686,664 in ESG funding is dedicated to this goal for Emergency Shelter Operations and Essential Services. Local non-profit direct service providers are contracted to administer ESG funds.

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 Community Services Department administers and supports several projects to help homeless persons make the transition to permanent housing. The County supports the Housing First Model emphasizing housing placement followed by wrap around supportive services. In addition, County-owned vacant parcels are also being considered for the development of affordable housing for homeless families and other eligible low-income households.

The County also partners with non-profit homeless services providers to implement affordable housing activities that directly affect the homeless population. Eligible affordable housing providers are encouraged to apply for annual funding allocations to promote and implement affordable housing activities, for all segments of the population, during the County's advertised Request for Applications (RFA) procurement process each fiscal year. Applications received are evaluated based on project scoring criteria.

Seminole County anticipates allocating \$ 45,042 of ESG Funds for rapid re-housing activities for extremely low and very-low -income families to avoid homelessness. This funding is anticipated to assist 24 households with direct financial assistance in the form of short-term rental assistance, security deposits, utility payments, or moving costs. Other eligible types of rapid re-housing assistance include housing search and placement, housing stability case management, mediation, legal services or credit repair. Recipients of the ESG Rapid Re-Housing assistance will be carefully evaluated by program criteria developed by the County, based on the federal ESG program regulations. Priority will be given individuals or families that present the most urgent need.

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.

The Seminole County Community Services Department administers an internal housing financial assistance program that provides rental, utility, and mortgage assistance to qualified families who are experiencing financial hardship due to job loss, medical problems, elderly and disabled garnishments, and more. The rental, utility and mortgage assistance program is funded through Seminole County general revenue funds, and can be applied for directly through the Community Services Department.

The Community Services Department also works in partnership with local mental health services, healthcare, and housing supportive services providers to supplement funding resources needed for qualified applicants, including low-income individuals and families, and extremely low-income

individuals and families, and persons with special needs being discharged from publicly funded institutions and systems of care. Community Services currently partners with Catholic Charities-Pathways to Care Program to provide medical care and housing for homeless persons with special health care needs who are being discharged from hospitals with no planned housing placements.

Discussion

The Seminole County Shelter Plus Care Program is an internally administered program that provides rental assistance and case management services to chronically homeless persons with disabilities. Applicants are identified and prioritized via the Homeless Continuum of Care Centralized Assessment System managed by the Homeless Services Network. Services are leveraged with State funding which provide matching funds for case management services. Seminole County also uses HOME funds to provide Tenant-Based Rental Assistance (TBRA) to elderly persons and persons with disabilities many of whom are extremely low-income.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Affordable housing is a growing concern at the federal, state and local levels. Housing affordability has also become an important public policy issue, as home ownership is viewed as being an important goal for both individual and social reasons. Housing prices, household incomes, and mortgage rates are the primary determinants of housing affordability.

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing. Seminole County recognizes that there can be institutional, regulatory, or policy barriers to development and promotion of access to affordable housing. Some of these barriers are at the discretion of County policymakers, including the permitting, zoning, and housing & community development offices. The following barriers may impact the development of affordable housing:

- Development approvals process. The development approval process can be time- and resourceintensive, particularly for developers of affordable housing.
- Density restrictions. Depending on the maximum allowable density in any given zoning category, higher density housing developments may be prohibited. Higher density housing is typically able to absorb more income-restricted housing and still maintain profitability for the developer, in addition to naturally enhancing the availability of housing overall in the County.
- Parking and setback requirements. Depending on the restrictions of parking and setbacks in the local land use code and comprehensive plan, these requirements may prohibit development of affordable housing.
- Affordable housing accessible to transit. Low-income households are more likely to depend on public transportation as a means of mobility. A lack of affordable housing near public transportation networks places an inherent restriction on a family's ability to reasonably access housing.
- Not In My Back Yard (NIMBY) Syndrome. The social and financial stigma of affordable housing can lead to significant resistance from surrounding properties.

In the case of new construction, significant barriers to creating affordable housing are reductions in federal and state housing funds, the land costs, impact fees, zoning, and compliance with new hurricane standards building codes.

In the case of existing housing rehabilitation, the cost of upgrading to new construction codes is a barrier. Health Department regulations restrict expansion of existing septic systems and the Federal Emergency Management Agency (FEMA) restricts rehabilitations to existing structures beyond a certain value on properties located within 100-year Floodplain.

As a recipient of funding from the US Department of Housing and Urban Development (HUD), Seminole

County develops an Analysis of Impediments to Fair Housing Choice (AI) to identify impediments or barriers to affordable housing and fair housing choice, and create actions toward the resolution of the barriers. The County's most recent Analysis of Impediments identified the following impediments to affordable housing and fair housing choice:

- Lack of awareness by residents and landlords of fair housing laws.
- High number of fair housing complaints on the basis of disability.
- Lack of affordable rental and owner housing.
- Poor credit history and collateral as a barrier to homeownership.

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

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the Plan describes the specific actions that the County will take to address the housing and community development needs of low- and moderate-income residents during FY2022-2023 based on the strategies outlined in the five-year plan for reducing lead-based paint hazards, reducing poverty, developing institutional structure, and enhancing coordination between the public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

One of the primary obstacles the County faces in meeting its goals is the limited resources available to address the priority needs identified in the Strategic Plan. Generally, the needs of low- and moderateincome persons exceeds available resources. To overcome this obstacle the County will collaborate closely with public and private sector organizations that provide services to a community or population where there is an unmet need to ensure that efforts are not duplicated, and resources are used effectively.

Actions planned to foster and maintain affordable housing

During FY2022-2023, Seminole County will foster and maintain affordable housing by continuing to fund and implement several housing programs with its CDBG and HOME allocations. Specifically, \$300,000 in CDBG funding will be used to implement the Minor Home Repair program, another \$200,000 used to implement the Rehabilitation/Reconstruction program with an additional \$89,627 to be used for project delivery costs associated with these programs. The HOME program is used solely for affordable housing activities and the FY2022-2023 HOME allocation of \$721,686 will be used for new construction homeownership units, infrastructure development and improvement, and administration of the HOME program. In some cases, the County will be directly funding rehabilitation activities using County procured contractors and maintaining beneficiary case files in house, and other times will use County approved CHDOs or non-profit housing providers to carry out the activities that foster and maintain affordable housing.

Additionally, Seminole County will foster affordable housing by encouraging the private sector to create housing units that will serve residents, including the most vulnerable, by adopting housing policies that incentivizing the development and preservation of affordable housing units.

To prevent affordable housing units becoming lost from the assisted housing inventory, the County continuously monitors Mortgage Deed and Notes that have active affordability periods for compliance. If the units are not in compliance, then the necessary measures are taken to bring the units into

compliance or recapture the funds.

Actions planned to reduce lead-based paint hazards

During the implementation of its housing programs, Seminole County will evaluate and reduce the number of housing units that contain lead-based paint hazards. The actions that the County will take to address LBP hazards and increase access to housing without LBP hazards include:

- Assess state and local capacity for reducing lead hazards.
- Establish a strategic plan to address needs through capacity development and targeted interventions.
- Coordinate and provide direction to contractors and housing providers involved in prevention efforts periodically.
- Ensuring that contractors completing work write-ups on housing units are certified to complete the proper testing. Contractors utilizing any federal funding providing by the County are required to be certified in conducting these types of hazard prevention methods when completing construction or rehabilitation projects.
- Maintaining a collaborative comprised of contractors and housing providers dedicated to conducting healthy home concepts.
- Performing visual assessments and healthy housing needs assessments for deteriorated paint surfaces for all properties considered for rehabilitation or restoration.
- When indicated based on the risk assessment, take appropriate steps to reduce the hazard.
- Coordinate with the local health department to maintain statistics on housing units identified to contain LBP.

These actions along with the requirements of 24 CFR Part 35, the Lead Safe Housing Rule, have been integrated into the policies and procedures governing the County's federally assisted housing programs. A summary of the strategy is outlined in section SP-65 of the Strategic Plan.

Actions planned to reduce the number of poverty-level families

During the implementation of its housing programs, Seminole County will evaluate and reduce the number of housing units that contain lead-based paint hazards. The actions that the County will take to address LBP hazards and increase access to housing without LBP hazards include:

- Assess state and local capacity for reducing lead hazards.
- Establish a strategic plan to address needs through capacity development and targeted interventions.
- Coordinate and provide direction to contractors and housing providers involved in prevention efforts periodically.
- Ensuring that contractors completing work write-ups on housing units are certified to complete

the proper testing. Contractors utilizing any federal funding providing by the County are required to be certified in conducting these types of hazard prevention methods when completing construction or rehabilitation projects.

- Maintaining a collaborative comprised of contractors and housing providers dedicated to conducting healthy home concepts.
- Performing visual assessments and healthy housing needs assessments for deteriorated paint surfaces for all properties considered for rehabilitation or restoration.
- When indicated based on the risk assessment, take appropriate steps to reduce the hazard.
- Coordinate with the local health department to maintain statistics on housing units identified to contain LBP.

These actions along with the requirements of 24 CFR Part 35, the Lead Safe Housing Rule, have been integrated into the policies and procedures governing the County's federally assisted housing programs. A summary of the strategy is outlined in section SP-65 of the Strategic Plan.

Actions planned to develop institutional structure

The County partners and collaborates with a number of agencies and organizations to address the housing and community development needs of low- and moderate-income persons. The County's Institutional Delivery Structure is described in Section SP-40 of the Strategic Plan. One of the main gaps identified in the County's institutional structure to achieve the goals in the Strategic Plan is the lack of Community Housing Development Organizations (CHDOs) to carry out affordable housing activities. CDHOs are a special type of non-profit organization that must meet certain criteria to be certified to perform eligible HOME activities. To overcome this deficit in non-profit housing development capacity in the County, Community Services Department staff have secured two non-profit organizations to be CHDOs. HANDS of Central Florida and Catholic Charities of Central Florida, certified CHDOs, currently have prior year(s) funds reserved for CHDO projects. To ensure the County continues to have at least two approved CHDOs, Seminole County Community Services Department will provide technical assistance to non-profit organizations expressing an interest to become certified CHDOs.

In the event other gaps or weaknesses in the current institutional delivery structure of implementing federal funding program activities are identified, the Seminole County Community Services Department will take all of the appropriate measures and implement any additional actions necessary to resolve those issues. The County, in conjunction with the municipalities, elected officials, citizens, non-profit agencies, and for-profit organizations, will continue networking and trying to assess what residents need and how best to meet those needs. Keeping the private and public sector aware of all services provided will be a key objective for the County.

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

service agencies

Seminole County will continue to enhance coordination between public and private housing and social service agencies by encouraging partnership for County funded projects and strengthening existing networking abilities through County sponsored community events, workshops and conferences.

Furthermore, Seminole County will complete the following actions to enhance coordination between public and private housing and social services agencies:

- Seminole County will continue the annual Request for Applications process for local non-profit organizations to submit request for consideration of grant funding to carry out the goals and objectives set forth in this Plan;
- Seminole County will enhance coordination with the Homeless Services Network of Central Florida, and other local private homeless providers, to expand access to data and needs for Seminole County's homeless population through participation on various housing and homeless committees;
- Seminole County will enhance coordination with public entities, such as the Seminole County Health Department, on issues such as lead based paint data collection and reporting and through public events promoting health and wellness.

Discussion:

Program Specific Requirements

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

Introduction:

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period	
of one, two or three years may be used to determine that a minimum overall	
benefit of 70% of CDBG funds is used to benefit persons of low and moderate	
income. Specify the years covered that include this Annual Action Plan.	0.00%

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

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

as follows:

- SHIP Grant
- Tenant-Based Rental Assistance (TBRA) Prior Year Funding Requires tenant contribution

While Seminole County's HOME TBRA tenants may have a portion of the rent they must pay on their own, Seminole County does not have any specific HUD approved investments beyond those identified in 24 CFR 92.205. The tenant based rental assistance program falls within the auspices of 92.205 and are not additional investments.

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:

Please refer to attached resale and recapture narratives

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:

Please refer to attached resale and recapture narratives

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:

There are no plans or intentions to use HOME Program funds to refinance existing debt for any multi-family housing units being rehabilitated with HOME funds.

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

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

Please refer to attached Emergency Solutions Grant (ESG) Internal Policy.

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 local Continuum of Care uses the Homeless Management Information System (HMIS); which is HUD compliant. Sub-recipients receiving ESG or Shelter + Care funds are required to report in the system; however more homeless service agencies report in the system.

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).

Seminole County publishes a Notice of Funding Availability (NOFA) each year to solicit the submission of proposals under the County's entitlement programs CDBG, HOME, and ESG. Proposals are accepted for CDBG-Public Facility, Public Services, as well as, HOME construction projects, and ESG shelter operations and rapid re-housing activities. Proposal are reviewed and scored by a Grant Review Team which makes recommendations to the Community Services Director and County Manager. The recommendations are also made available for Public Comment and then to the Board of County Commissioners for approval.

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.

While completing the 2020-2024 Consolidated Plan, the Continuum of Care and homeless service providers were contacted, in addition to anyone in the general public, and asked to participate in the Public Hearings and in the Community Needs Survey, at the meeting homeless issues were specifically discussed. In addition, the Point-In-Time Survey is available for review and referenced to assist in considering policies and funding decisions. The Citizen Participation Plan is followed when making funding decisions. All funding recommendations are provided for public comment. Public hearings are held to solicit feedback on the County's performance in November/December each year and are held to solicit recommendations for funding in April or May of each year. Homeless service providers are contacted and asked to participate in the public hearings in order to solicit feedback regarding the homeless and formerly homeless individuals.

Seminole County's Board of County Commissioners is made up of elected officials and does not have a homeless or formerly homeless individual serving in that capacity. Seminole County partners with the Homeless Services Network (HSN), the lead agency in the Continuum of Care. HSN has membership that represents the Homeless and formerly homeless populations. During the development of the FY2022-2023 Action Plan, HSN was consulted. Seminole County also participates in CoC meetings for feedback.

5. Describe performance standards for evaluating ESG.

Please refer to attached Emergency Solutions Grant (ESG) Internal Policy.

<u>Attachment 1</u>: Citizen Participation Plan

Seminole County Citizen Participation Plan

Approved by the Seminole County Board of County Commissioners on July 28, 2015, amended on December 13, 2016, and subsequently amended May 12, 2020.

The Seminole County Citizen Participation Plan outlines ways in which the citizens of Seminole County can participate in its Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Neighborhood Stabilization Program (NSP 1 & 3), and Emergency Solutions Grants (ESG) Programs. Its purpose is to encourage and solicit public participation in the planning process, as well as to meet the requirements of the U.S. Department of Housing and Urban Development (HUD). Any persons who require assistance in reading or understanding this Plan or any other documents described herein due to disability or difficulty with the language, will be provided assistance sufficient to enable them to understand its purpose and provisions.

CONSULTATION AND ENCOURAGED PARTICIPATION

When preparing the Consolidated Plan, Annual Action plan, or while developing the Assessment of Fair Housing (AFH), consultation is made with public and private agencies that provide housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws will also be consulted, as well as regional government agencies and adjacent local governments, to include metropolitan-wide planning and transportation agencies.

In order to prepare strategies and proposed actions to affirmatively further fair housing, consultation will be made with the Seminole County Housing Authority and any other public housing authority operating within our jurisdiction in the development of the Consolidated Plan and the Assessment of Fair Housing.

In addition to participation by citizens, involvement by the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faithbased organizations is encouraged in the development of the Consolidated Plan and the Assessment of Fair Housing.

1. AVAILABILITY OF PLANS, DOCUMENTS

The Seminole County Citizen Participation Plan, past and current Consolidated Plans and amendments thereto, Annual Action Plans, past and current Consolidated Annual Performance and Evaluation Reports (CAPERs), and the Assessment of Fair Housing, once complete, are available for public review at any time. Copies of these documents may be obtained through the Community Development Office, Reflections Office Plaza, and 534 West Lake Mary Boulevard, Sanford, FL 32773 during normal business hours which are Monday through Friday from 8AM-5PM. At the time the Citizen Participation Plan, any Consolidated Plan, any Action Plan, any CAPER, or Assessment of Fair Housing is initially proposed, the public will be informed of its availability through a summary notice in the Orlando Sentinel newspaper, as a display ad in the Seminole section of the newspaper, and on the County's website (Community Services and/or Community Development page) to include the location where copies of the requested document can be obtained. A reasonable number of free copies will be made available. Upon request, the document(s) will be made available in a form accessible to persons with disabilities. This process

will be repeated at any point where any listed document is updated or this process is required by Federal or State law.

2. PUBLIC HEARINGS

There shall be at least two public hearings per year to obtain citizens', public agencies', and other interested parties' views. Any comments or views of citizens received in writing or orally at the public hearings will be considered in preparing the Consolidated Plan, Action Plan, CAPER, or Assessment of Fair Housing. Together, the hearings must address the public's views on housing and community development needs, development of proposed activities and review of program performance. One public hearing will be held before the proposed Consolidated Plan, Action Plan, or Assessment of Fair Housing is published for public comment and the second public hearing shall be held to obtain public comment on the CAPER. All notices of public hearings will be published in the Orlando Sentinel newspaper at least 7-14 days prior to the public hearing as a display ad in the Seminole Section of the newspaper. Language will be included in the notification that persons with disabilities whom need assistance to participate in the proceedings should contact the Human Resources Department ADA Coordinator 48 hours in advance of the meeting, the appropriate contact information will be included.

3. SPECIAL NOTIFICATION

In addition to notices in newspapers, Seminole County will notify persons of proposed Community Development activities and projects in unincorporated County designated "impact areas" (target areas) through neighborhood-based methods. The target areas are considered low- and moderate-income neighborhoods and traditionally have a higher minority concentration. These methods may include direct contact with local neighborhood leaders; posting and/or distribution of notices. Similarly, notification will be provided to the Seminole County Housing Authority in order to encourage the participation of their residents.

4. ACCESSIBILITY

Unless otherwise noted, all public meetings concerning the HOME, CDBG, NSP 1 & 3, and ESG programs will be held at the Seminole County Board of County Commissioners Chambers at 1101 E. First Street, Sanford, FL 32771. Meetings will be held between 6:00 p.m. and 8:30 p.m. on weekdays. At a minimum, staff will attempt to hold public meetings associated with the 5-Year Consolidated Plan in target areas. Meeting locations will be accessible to persons with disabilities. The meeting announcement will indicate how to request additional modifications for the special needs of persons with disabilities. Persons with disabilities whom need assistance to participate in the proceedings should contact the Human Resources Department ADA Coordinator 48 hours in advance of the meeting, the appropriate contact information will be included in the published notice.

5. INFORMATION TO/FROM PUBLIC

Prior to the development of the Annual Action Plans, Seminole County will make public to its citizens, public agencies, and other interested parties, information that includes the amount of assistance that the County expects to receive (including grant funds and anticipated program income), the range of activities that will be undertaken, including the estimated amount of funding that will benefit persons of low- and moderate income). The participation of citizens will be encouraged as part of the determination of the community's needs. The public's written comments and oral suggestions at the public hearing will be considered as part of the development of the Community Development Needs Assessment.

6. COMMENTS/CONSIDERATION OF PROPOSED PLANS AND ASSESSMENT OF FAIR HOUSING

Prior to approval of each 5-Year Consolidated Plan, Annual Action Plan, Substantial Amendments to the Annual Action Plan, and Assessment of Fair Housing by the Board of County Commissioners, a thirty day (30) public comment period will be held to solicit public comment for the proposed drafts. Written comments should be made to the Seminole County Community

Development Office, 534 West Lake Mary Blvd, Sanford, Florida 32773. All comments will be considered and a summary of all comments received will be appended to the Plan(s) and Assessment submitted to HUD.

Prior to submission of the CAPER to HUD, a minimum 15-day public comment period will be held to solicit public comment for the performance report. Written comments should be made to the Seminole County Community Development Office, 534 West Lake Mary Boulevard, Sanford, Florida 32773. All comments will be considered and a summary of all comments received will be appended to the Report.

In accordance with the Coronavirus Aid, Relief, and Economic Security Act (CARES).

CARES ACT substantial amendments related to special funding in response to COVID-19, have a minimum 5-day public comment period. The public will also have reasonable notice regarding the public comment period. Seminole County applied and received the necessary HUD waivers for this expedited comment period, to ensure funds can reach communities as quickly as possible during this unprecedented crisis. A summary of the proposed amendments will be published in the Orlando Sentential and documents posted on the County Website. Comments will be received by email or standard mail to accommodate social distancing requirements.

7. TRANSLATION TO OTHER LANGUAGES

Federal regulations governing the CDBG, HOME, NSP 1 & 3, and ESG programs require that the Citizen Participation Plan to address the needs of non-English-speaking residents. If ten percent or more of the potential or actual beneficiaries of a HOME, CDBG, NSP 1 & 3, or ESG program project are determined to be non-English-speaking, provisions will be made at the appropriate public hearings for translation of comments and documents into the native language of the majority of the non-English-speaking residents affected.

8. WRITTEN COMMENTS

Written comments or complaints concerning Seminole County's Consolidated Plan, Annual Action Plan, any Substantial Amendments, CAPER, and the Assessment of Fair Housing will be responded to in writing within fifteen (15) working days. All comments will be considered and a summary of those comments or views will be appended to the respective document. Written comments should be made to the Seminole County Community Development Office, 534 West Lake Mary Boulevard, Sanford, Florida 32773.

9. PROGRAM CHANGES

The County will use the following criteria for determining what changes in the County's planned or actual activities constitute a Substantial Amendment to the Consolidated Plan or any One-Year Action Plan. An amendment is required whenever it makes one of the following decisions:

- 1. To make a change in its allocation priorities or a change in the method of distribution of funds;
- 2. To carry out an activity using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Action Plan;
- 3. To substantially change the purpose, scope, location, or beneficiaries of an activity. The following criteria are to be used for determining whether an amendment would constitute a Substantial Amendment:
 - a) Purpose Whenever a change in the primary function of an activity requires that it be classified under a different eligible activity. (Note: This does not include a project that is generally unchanged, but is reclassified due to a reinterpretation of HUD regulations or definitions).
 - b) Scope If the service area, budget, or beneficiaries is changed so that 50% or more of the intended beneficiaries are no longer able to benefit from the activity. This does

not include a budgetary change in a Direct Benefit or other activity where a service or other benefit is available as long as funds are available.

- c) Location If the location of an activity is changed so that 50% or more of the intended beneficiaries are no longer able to benefit from the project.
- d) Beneficiaries If the activity's location or eligible recipients are changed so that 50% or more of the intended beneficiaries are no longer able to benefit from the activity. This does not include a budgetary change in a Direct Benefit or other activity where a service or other benefit is available as long as funds are available.

Citizens, public agencies, and other interested parties will be provided with reasonable notice and an opportunity to comment on all Substantial Amendments. The County will advertise in the Orlando Sentinel and on its own web site and will provide no less than 30 days to receive comments on any amendment before the amendment is implemented. A summary of any comments, including the reasons for those not accepted, will be appended to the amendment.

10. AVAILABILITY OF PROGRAM RECORDS

Citizens, public agencies, and other interested parties of Seminole County will be provided with reasonable access to records concerning any activity undertaken with CDBG, HOME, NSP 1 & 3, or ESG Program funds. Any such request for access to records should be made in writing to Seminole County Community Development Office, The telephone number is 407 665-2300 and the TTY number is 407-665-6511. Seminole County may charge reasonable fees for the duplication and provision of materials. Confidential information normally protected under state and federal freedom of information laws will not be available for public review.

11. PLANS TO MINIMIZE DISPLACEMENT

The County will make every effort to minimize displacement of households and businesses, and has prepared an Anti-displacement and Relocation Plan to address the actions it will take to do so. That Plan is under separate cover, and is incorporated herein by reference.

12. ASSISTANCE TO GROUPS

Technical assistance is available to groups representative of persons of low and moderate income that request assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan, or for assistance to comment on the Assessment of Fair Housing.

13. DEFINITIONS

Predominately low- and moderate-income neighborhoods: A geographical location that consists of a minimum of 51% of the households in the area being at or below 80% of the area median income.

14. CITIZEN PARTICIPATION PLAN COMMENT PERIOD

The comment period for this proposed amendment to the Seminole County Citizen Participation Plan will be for 30 days beginning November 10, 2016 and ending on December 9, 2016. A draft copy of the proposed amendment was advertised in the local section of the Orlando Sentinel, and online via the Seminole County Community Development web page.



<u>Attachment 2</u>: Seminole County Community Development Limited English Proficiency Plan

Seminole County Community Development Division Limited English Proficiency Plan

Community Development Division 534 West Lake Mary Boulevard Sanford, Florida 32773 (407) 665-2300

Effective July 21, 2011

Seminole County Community Development Limited English Proficiency Plan

PURPOSE

This document serves as to show the Community Development Division's commitment to provide access to all individuals accessing services and assistance. Limited English Proficiency (LEP) individuals are to be informed of the availability of free interpretation and translation services when it appears that the individual is not able to communicate effectively in English. Such services will be provided during all normal business hours and when an emergency has been determined to exist during non-business hours.

At no time will any Division employee or contractor indicate – either verbally or in writing – that any LEP applicant or client accessing County services will be charged for interpretation or translation services.

Dissemination of the Limited English Proficiency Plan is to occur via many routes. Any individual will be able to access the plan via the Internet on the Community Development web site. All Division employees will have access to it via the Internet and through paper copy dissemination. Paper copies will also be available in English and in Spanish for applicants and clients in the waiting area(s). LEP individuals can obtain copies and/or translations upon request.

LANGUAGE ASSISTANCE RESOURCES OFFERED

Limited English Proficiency Populations to Be Served

Currently, only Spanish and American Sign Language interpretation and translation is available. Select Division staff members are available during normal working hours to offer such services. These staff members will be utilized to facilitate transactions within the staff person's division and for all County departments whenever possible.

PROCEDURE TO ACCESS LANGUAGE ASSISTANCE

Means of Providing Interpretive Services

While bilingual staff may not be available to interpret for any language encountered, many other departments and divisions have other bilingual staff available to meet the needs of many LEP individuals.

Use of bilingual staff: Each County department will be contacted to provide a list of all staff persons within their department that are bilingual. Due to the constantly changing workforce composition, this list may change frequently. With this list, and depending upon immediate availability of bilingual staff members, interpretation can be provided via telephone, instant messaging, or in person.

If the client has been offered free interpretive services and chooses to utilize his/her own interpreter – i.e., friend, family member or community member – that will be allowed.

When confronted with a situation in which the client is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the LEP individual in the completion of necessary forms and documents.

Seminole County Community Development Limited English Proficiency Plan

When individuals require access to services within short time frames, the staff member – in consultation with a Supervisor or Manager – will take whatever steps deemed necessary to ensure that all clients, including LEP clients, have access to services within the appropriate time frame. The goal is to make its services accessible within the required time frame, whether that means using an interpreter or another appropriate type of language assistance.

Document Translation

The need for assistance in the application process for many County programs poses some unique challenges. While the Community Development Division employs staff with the ability to assist in these functions, they are not able to cover all language needs in all locations. While many application forms and critical documents are available in translated format, low literacy rates in some LEP populations, a lack of translated materials in all languages, and a lack of translated information on such topics as program eligibility, income and asset limits present additional challenges to County staff.

Through a process of prioritization, the Division Manager and division staff will identify critical and vital documents to be translated into Spanish. Translation into other languages will depend upon demand.

Privacy Issues

Most staff members use walled offices to conduct client and/or patient interviews in a private and confidential manner. Privacy will a chief consideration, within reason and practicality.

Complaints

Complaints of a Limited English Proficiency nature will be forwarded to the Division Manager, with the expectation that an inquiry will be conducted in a timely manner. If any of the issues involve Federal/State protected classes, and a possible violation of any Seminole County non-discrimination policy, management will consult with the Human Resources Division Manager for guidance.

The Division Manager will review the complaint, conduct interviews with all parties, and recommend a course of corrective action to the Human Resources Manager.



<u>Attachment 3</u>: Seminole County HOME Resale and Recapture Provisions

Seminole County HOME Resale and Recapture Provisions

Recapture

Seminole County uses recapture provisions to recover direct subsidies to homebuyers. Direct assistance is secured through deferred payment loans and secured with a mortgage, deed, and promissory note. Homeowner assistance includes purchase assistance, housing rehabilitation, and new construction. Recapture is used for County programs and initiatives. Program Participants are required to maintain the housing unit as their primary residence for the duration of the affordability period. Requirements are also stipulated in the HOME agreement.

6 YearsTotal Amount ofUp to \$15,00012 YearsTotal Amount of\$15,001 up to \$30,00020 YearsTotal Amount of\$30,001 up to \$50,00026 YearsTotal Amount of\$50,001 up to \$65,00030 YearsTotal Amount of\$65,001 and up

The affordability periods are as follows:

Seminole County recaptures the pro-rata share of direct assistance if the homeowner defaults on the terms of the deferred payment loan, which requires the homeowner to: reside in the home as a principal residence, maintain homestead exemption, not sell, transfer, refinance etc. without prior County approval, whether voluntarily or involuntarily, not to have the title divested, not lease or rent the housing unit. Seminole County has separate policies to address mortgage assumption after the death of a homeowner and loan subordinations.

The fair return on investment is as follows: the amount of the deferred payment loan is forgiven based on the length of time the homeowner occupies the home versus the length of the affordability period. The deferred loan is reduced annually based on the affordability period. (1/6th $1/12^{th}$, 1/20th, and $1/30^{th}$ respectively). The fair rate of return is based on the aforementioned objective standard.

Direct HOME Assistance funds are recaptured before any homeowner investment is repaid. The County recaptures the HOME investment from the net proceeds of the sale. The homeowner is not limited in who the home can be sold to with regard to income, for recapture.

Net proceeds are the sales price less the superior loan repayments, homeowner investment and closing costs. Seminole County may recapture an amount less than or equal to the net proceeds available, if recaptured is triggered by a voluntary or involuntary sale during the period of affordability, and there are minimal or no net proceeds to pay the HOME investment due. If the net proceeds exceed the amount needed to repay the homeowner investment and the direct HOME subsidy, the excess proceeds are kept by the homeowner. If there are no net proceeds, the debt and lien will be considered terminated.

Homeowner investments include improvements such as: installation of energy efficiency items, permitted home additions, remodeling of the kitchen, remodeling of a bathroom, or remodeling of the exterior which includes replacement of siding, or the addition of a deck or patio.

Resale

Seminole County allows for the use of resale provisions to obtaining housing assisted with rehabilitation, down payment assistance and new construction for sub recipient agencies such as Habitat for Humanity. Funds are secured through the use of a mortgage, deed and promissory note. In addition, Seminole County uses a restrictive use covenant to secure the investment and ensure its continued use for affordable housing. The covenant runs with the land through the duration of the affordability period. The housing unit must be resold to an eligible low income buyer, as approved by Seminole County if default occurs during the affordability period. The affordability periods are stipulated in the HOME agreement and are as follows:

6 Years	Total Amount of	Up to \$15,000
12 Years	Total Amount of	\$15,001 up to \$30,000
20 Years	Total Amount of	\$30,001 up to \$50,000
26 Years	Total Amount of	\$50,001 up to \$65,000
30 Years	Total Amount of	\$65,001 and up

The affordability periods are as follows:

The home owners are required to: reside in the home as a principal residence, maintain homestead exemption, not sell, transfer, refinance etc. without prior County approval, whether voluntarily or involuntarily, not to have the title divested, not lease or rent the housing unit. Seminole County has separate policies to address mortgage assumption after the death of a homeowner and loan subordinations. Failure to adhere to these requirements triggers default.

The fair return on investment is as follows: If the homeowner resells the unit to an eligible, low- income buyer and the net proceeds exceed the amount needed to repay the homeowner investment and the direct HOME subsidy, the excess proceeds are kept by the homeowner. Net proceeds are the sales price less the superior loan repayments, homeowner investment and closing costs. Homeowner investments include the homebuyer's improvements such as: installation of energy efficiency items, permitted home additions, remodeling of the kitchen, remodeling of a bathroom, or remodeling of the exterior which includes replacement of siding, or the addition of a deck or patio. The fair return is based on the aforementioned objective standard.

Seminole County uses restrictive use covenants to preserve affordable housing and enforce the resale provisions to low income homebuyers. Seminole County does not make any presumptions of affordability.

To provide a fair return on investment, Seminole County allows the original homeowner to keep excess net proceeds and also allows for the homeowner's investment to be repaid if there are adequate net proceeds to recover both the direct HOME investment and the homeowner investment into the unit. Seminole County considers the homeowners contribution for the County purchase assistance program and the improvements made to the house, related to interior and exterior remodeling as outlined above.

Seminole County recognizes the need for affordable housing for low income households. During the development of the Consolidated Plan, a market analysis was conducted that revealed a need for additional affordable housing in Seminole County because of large numbers of severely cost burdened renters and homeowners. The Shimberg Center for Housing Studies Affordable Housing Needs Study estimates that between 2015 and 2020, 14,124 owner-occupied households and 14,893 rental households will face a severe housing cost burden of 50% or greater than their household monthly income. These housing statistics illustrate that the housing units available do not meet the needs of the low-income owner and renter population in Seminole County due to the current housing market trends. Furthermore, according to a study completed by the University of Florida Bureau of Economic and Business Research in 2013, it is projected that Seminole County's population is anticipated to grow by an estimated 34,926 persons by 2020.

Seminole County's state funded (SHIP) homebuyer purchase assistance program assists persons with incomes up to 120% of AMI, but there is still a need to offer homeownership opportunity to household with incomes that range between 65% and 80% of AMI, because various rental assistance programs seek to assist persons with incomes at or Below 50% of AMI, some housing tax credit developments can assist renters with incomes that are greater than 50% AMI but less than 65% of AMI.

<u>Attachment 4</u>: Emergency Solutions Grant (ESG) Internal Policy



Seminole County Government

Community Services Department

Emergency Solutions Grant (ESG) Internal Policy

ESG POLICY – TABLE OF CONTENT

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ATTACHMENTS

- A. ESG STANDARDS MATRIX
- B. RECORDKEEPING REQUIREMENTS
- C. CRITERIA FOR DEFINING HOMELESS
- D. CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS

POLICY STATEMENT:

PURPOSE: This document will serve as the internal policy for the implementation and deliverance of the Emergency Solutions Grant (ESG) Program authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378)under the Emergency Solutions Grants (ESG) Program, regulated by Department of Housing and Urban Development (CFR 24 Part 576).

Funding is awarded from the Department of Housing and Urban Development (HUD) for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelter, for essential services related to emergency shelters, street outreach, homelessness prevention and rapid re-housing assistance.

1. PROGRAMMATIC FRAMEWORK

The ESG Program authorized under title IV of the revised McKinney-Vento Act, provide grantees with the framework to:

- maximize communitywide planning and strategic use of resources to prevent and end homelessness;
- improve coordination and integration with mainstream services to marshal all available resources, capitalize on existing strengths, and increase efficiency;
- improve coordination within each community's homeless services, including services funded by other programs targeted to homeless people;
- expand resources and services available to prevent homelessness;
- realign existing programs and systems to focus on shortening homelessness, while directing funding to the most critical services to help people achieve long-term housing stability and avoid becoming homeless again;
- standardize eligibility determinations and improve the targeting of resources;
- improve data collection and performance measurement;
- and allow each community to tailor its program to the particular strengths and challenges with that community.

2. PROGRAM DESCRIPTION

ESG provides short to medium term financial assistance and services to prevent individuals and families from becoming homeless or providing outreach and assistance to those who are experiencing homelessness to be quickly rehoused and stabilized.

3. HOMELESS AND AT RISK OF HOMELESSNESS DEFINITIONS

Homeless means:

(1) individual or family who lacks a fixed, regular and adequate nighttime residence.

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping

accommodation for human beings, including a car, park, train station, airport or camping ground;

- (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements; or
- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

(4) Any individual or family who is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions

At risk of homelessness means:

- (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area;
 - (ii) Does not have sufficient resources or support networks, immediately available to prevent them from moving to an emergency shelter or another place (reference *"homeless"* definition (1)(i)) and;
 - (iii) Meets one of the following:
 - (A) Has moved because of economic reason two or more times during the 60 days immediately preceding the application for prevention assistance; or
 - (B) Is living in the home of another because of economic hardship; or
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application; or
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government; or
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two person or lives in a larger housing unit in which there reside more than 1.5 persons per room; or
 - (F) Is exiting a publicly funded institution, or system of are (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution; or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in recipient's approved consolidated plan.

4. ELIGIBLE COMPONENTS

ESG funds may be used for five program components:

Street Outreach

These activities are designed to meet the imm	nediate needs of unsheltered homeless people by		
_	using, and /or critical health services. § 576.101		
Activity type: Essential Service			
Eligible costs:			
Engagement Emergency Mental Health Services			
Case Management Transportation			
Emergency Health Services Services for Special Populations			

Emergency Shelter

These activities are designed to increase the quantity and quality of temporary shelters provided to homeless people, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelter, providing essential services. § 576.102 Activity types:

Essential Services	Renovation (includes Major Rehab and Conversion)	Shelter Operations	Assistance Required Under the Uniform Relocation and Real Property Acquisition Act of 197 (URA)
Eligible costs: • Case management • Child Care • Education Services • Employment Assistance and Job Training • Outpatient Health Services • Legal Services • Life Skills Training • Mental Health Services • Substance Abuse Treatment Services • Transportation • Services for Special Populations	Eligible costs: • Labor • Materials • Tools • Other costs for renovation (including rehab or conversion)	Eligible costs: Maintenance Rent Security Fuel Equipment Insurance Utilities Food Furnishings Supplies necessary for shelter operation Hotel/Motel Vouchers	Eligible costs: • Relocation payments • Other assistance to displaced persons

Homelessness Prevention

These activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human through housing relocation and stabilization services and short- and/or medium-term rental assistance. § 576.103

Activity types:

Rental Assistance **	Housing Relocation and Stabilization Services		
Eligible costs:	Financial Assistance	Services Costs	
 Short-term rental assistance 	Eligible costs:	Eligible costs:	
Medium-term rental assistance	Rental Application Fees	Housing Search and	
Rental arrears	Security Deposits	Placement	
	Last Month's Rent	Housing Stability Case	
**Rental assistance can be project-	Utility Deposits	Management	
based or tenant-based.	Utility Payments	Mediation	
	Moving Costs	Legal Services	
		Credit Repair	

Rapid Re-housing

These activities are designed to move homeless people quickly to permanent housing through housing relocation and stabilization services and short- and/or medium-term rental assistance. § 576.104

Activity types:

Rental Assistance **	Housing Relocation and Stabilization Services		
Eligible costs:	Financial Assistance	Services Costs	
 Short-term rental assistance 	Eligible costs:	Eligible costs:	
Medium-term rental assistance	Rental Application Fees	 Housing Search and 	
Rental arrears	Security Deposits	Placement	
	Last Month's Rent	Housing Stability Case	
	Utility Deposits	Management	
**Rental assistance can be project-	Utility Payments	Mediation	
based or tenant-based.	Moving Costs	• Legal Services	
		Credit Repair	

HMIS

HMIS Component. These activities are designed to fund ESG recipients' and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness. § 576.107

Activity type: HMIS

Eligible costs:

- Contributing data to the HMIS designated by the CoC for the area;
- HMIS Lead (as designated by the CoC) costs for managing the HMIS system;
- Victim services or legal services provider costs to establish and operate a comparable database.

Administrative Activities

*Administrative Activities. § 576.108

Eligible costs are broadly categorized as follows:

- General management, oversight, and coordination
- Training on ESG requirements (HUD provided)
- Consolidated Plan
- Environmental review

5. ESG ACTIVITIES WRITTEN STANDARDS

- The recipient or subrecipient must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements as established by the Continuum of Care (CoC).
- The recipient or subrecipient must income qualify program participants annual income does not exceed 30 percent of area median income (AMI) for the area, as determined by HUD.
- The recipient or subrecipient may provide up to 24 months of rental assistance not to exceed those 24 months to eligible program participants. (*Program length and extension of financial services will be determined by the County.*)
- Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, for a term no less than 12 months with option for renewal unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant.
- The recipient or subrecipient must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education and youth programs.
- All ESG funded projects within the Continuum of Care (CoC) must utilize the centralized coordinated assessment system established.
- The recipient or subrecipient must ensure data on all persons served and all activities assisted under ESG are entered into the applicable community-wide Homeless Management Information System (HMIS).

5.1 ELIGIBLE /PRIORITZE POPULATIONS

Seminole County family or individual (Referred via Coordinated Entry System)

- 1. Must be literally homeless (Category 1)
- 2. Fleeing or attempting to flee domestic violence (Category 4)
- 3. Imminent Risk of Homelessness (Category 2)

5.2 HOUSING STANDARDS

All RRH units supported by ESG funds must meet the following criteria for rental assistance:

- Units must pass HUD Habitability Standards
- Rental assistance may cover up to the Fair Market Rent (FMR) for a unit
- Units must comply with HUD's rent reasonableness standards

5.3 MINIMUM EMERGENCY SHELTER STANDARDS

Any building for which ESG funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards as applicable and any emergency shelter that receives assistance for shelter operations must meet the following minimum safety, sanitation, and privacy standards.

- The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
- Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleet and adequate space and security for themselves and their belongings.
- Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- The shelter's water supply must be free of contamination.
- The shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- The shelter must have any necessary heating/cooling facilities in proper operating condition.
- The shelter must have adequate natural or artificial illumination to permit normal indoor activities. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- Food preparation areas, must contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
- The shelter must be maintained in a sanitary condition.
- There must be at least one working smoke detector in each occupied unit of the shelter. The fire alarm system must be designed for hearing-impaired residents. All public areas

of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or emergency.

• Involuntary family separation is prohibited - the age of a child under 18 must not be used as a basis for denying any family's admission to an emergency shelter

5.4 CASE MANAGEMENT MINIMUM STANDARDS

While providing homelessness prevention or rapid rehousing assistance, the recipient or subrecipient must:

- Require the program participant to meet with a case manager not less than once per month
- Develop a plan to assist the program participant to retain permanent housing after the ESG assistance end

5.5 TERMINATING ASSISTANCE STANDARDS

If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with an established formal process that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Participants may face program termination under the following circumstances:

- **1.** Failure to report any income changes in writing within ten (10) days
- 2. Unauthorized household members not approved and documented on the lease
- **3.** Disturbing, annoying or inconveniencing neighbors and landlord by violating any law or ordinance, commuting waste or nuisance upon or around the premises; destruction of property that result in damages to the unit or property
- 4. Failure to pay rent when due
- 5. Failure to meet case manager, at minimum once monthly
- 6. Drug related activities/arrests
- 7. Violent felony/ assaults, abusive behavior (physical or verbal) involving any household member, guest and County staff
- 8. Child abuse where children have been removed (DCF involved cases)
- 9. Letting or subletting any part of the unit
- **10.** Repeated and serious lease violations
- **11.** Knowingly suppling false information
- 12. Other violations, determined on a case-by-case basis

5.6 RIGHT TO INFORMAL REVIEW:

Households determined to be ineligible or in violation of program requirements, the County will notify the household in writing within ten (10) days of said determination and inform the household of its right to an informal review.

- 1. Program participant must submit a written request for informal review to the recipient or subrecipient within 10 business days of the date of the decision
- 2. Upon receipt of the request, the recipient or subrecipient will schedule an informal review within ten (10) business days and timely notify the household of the date and time the review has been scheduled.
- 3. The request will be viewed by a person other than the staff who made or approved the termination decision
- 4. Based upon the staff recommendations, final determination of appeal will be made by the recipient or subrecipient Program Manager with written determination provided promptly to the household within seven (7) business day of receipt of staff recommendation

Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date.

6. INELIGIBLE AND PROHIBITED ACTIVITES

- Property acquisition or new construction
- Staff recruitment
- Training
- Fundraising
- Direct payments to individuals (including gift cards)
- Mortgage payments and property taxes
- Car repairs
- Personal debt/credit card payments
- Medical, dental, prescription payments
- Personal hygiene & grooming items
- Clothing, shoes
- Home furnishings
- Pet care
- Work or education related materials

7. OTHER FEDERAL REQUIREMENTS

7.1 CONFLICTS OF INTEREST

Organization conflicts of interest.

ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient or subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required or administer homelessness prevention assistance.

Individual conflicts of interest.

For the procurement of goods and services, the recipient and its subrecipients must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for government) and 24 CFR 84.42 (private non-profits).

Conflicts prohibited.

No person described in the paragraph above in this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure. *Persons Covered.*

This section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

7.2 HOMELESS PARTICIPATION

- (a) The recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of director or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under ESG.
- (b) If the recipient is unable to meet requirement under the above paragraph, it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under ESG. The plan must be included in the annual action plan required under 24 CFR 91.220.
- (c) To the maximum extent practicable, the recipient or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

7.3 FAITH-BASED ACTIVITIES

(a) Organizations that are religious or faith-based are eligible on the same basis as any other organization to receive ESG funds.

(b) Organization that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.

7.4 AFFIRMATIVE OUTREACH

The recipient or subrecipient must make known the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis and will reach persons of any race, color, religion, sex, age, national origin, familial status, or disability.

7.5 ENVIRONMENTAL REVIEW

The recipient or subrecipient, or any contractor of the recipient or subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project, commit or expend HUD or local funds for eligible activities until an environmental review under 24 CFR part 50 has been completed.

7.6 MATCH REQUIREMENT

The recipient will commit matching contributions to supplement the ESG program in an amount that equals the amount of ESG funds awarded by HUD.

7.7 CONFIDENTIALITY

The recipient and its subrecipients must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- (ii) The address or location of any domestic violence, dating violence, sexual assault or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- (iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

8 EXPENDITURE AND PAYMENT REQUIREMENTS

(a) Within 180 days after the date that HUD signs the grant agreement or amendment for reallocation of funds, the recipient must obligate all the grant amount, except the amount for its administrative cost. This requirement is met by an agreement with, or a letter of award to a subrecipient, procurement contact or a written designation of a department within the government of the recipient to directly carry out an eligible activity.

- a. Application responses for open RFA's from agencies may be exempt at the County's discretion to satisfy administering funding in accordance with HUD requirements.
- b. Prior funding year executed agreements may be amended to extend term and allocate funding from the upcoming funding year, for the purpose of maintaining existing services and to limit delay in service implementation.
- (b) The recipient must draw down and expend funds from each grant year's grant not less than once during each quarter of the recipient's program years. All of the recipients grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient.
- (c) The recipient must pay each subrecipient for allowable costs within 30 days after receiving the subrecipient's complete payment request.

9 RECORDKEEPING AND REPORTING REQUIREMENTS

- (a) The recipient and subrecipient must keep documentation evidencing the use of, and written intake procedures for the centralized or coordinated assessment system developed by the Continuum of Care (CoC).
- (b) Program participant records must be kept for each program participant that documents:
 - a. Evidence of homeless status or "at risk of homelessness"
 - b. Services and assistance provided, including as applicable, the security deposit, rental assistance and utility payments
 - c. Where applicable, compliance with the termination of assistance
 - d. Include copies of all leases and documentation of payments made to owners
 - e. Document the monthly allowance for utilities
 - f. Documentation of compliance with the shelter and housing standards, including inspection reports
- (c) The recipient must keep records of the emergency shelters assisted under ESG, including the amount and type of assistance provided to shelter.
- (d) The recipient must keep records of the types of essential services, rental assistance and housing stabilization and relocation services (if applicable) provided under the recipient's program and the amounts spent on these services
- (e) The recipient and its subrecipients must document their compliance with the requirements for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.
- (f) The recipient must keep records of the participation in HMIS by all projects of the recipient and its subrecipients.
- (g) Records of the source and use of contributions made to satisfy the matching requirements in §576.201. The records must indicate the particular fiscal year grant, and

must show how the value placed on third-party, noncash contributions was derived. Volunteer services must be supported by the same methods used to support the allocation of regular personnel costs.

- (h) The recipient and its subrecipients must keep records to show compliance with the organization conflicts-of-interest requirements in §576.404(a)
- (i) The recipient must document its compliance with homeless participation requirements §576.504
- (j) The recipient and its subrecipients must document their compliance with Faith-based activities requirements §576.406
- (k) The recipient and its subrecipients must document their compliance with the Federal requirements in §576.407, as applicable, including:
 - a. Records demonstrating compliance with nondiscrimination and equal opportunity requirements
 - b. Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 85 (for governments) and 24 CFR part 84 (for nonprofit org)
 - c. Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
 - d. Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR 87.
- (I) The confidentiality procedures of the recipient and its subrecipients must be in writing and must be maintained.
- (m) All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years after the expenditure of all funds from the grant under which the program participant was served.

ADDENDUM

SPECIAL FUNDING - ESG-CV, ESG Grant (FY 2020 and older)

ESG recipients have the immediate ability to omit the citizen participation and consultation requirements for substantial amendments and new consolidated plan submission for ESG-CV funding. Each grantee must publish how it has used and will use its allocation, at a minimum, on the Internet at the appropriate Government website or through other electronic media.

These new provisions are only applicable to ESG funding from the CARES Act.

CARES Act Flexibilities

SUMMARY:

- \$4 Billion appropriation
- No Emergency Shelter/Street Outreach cap
- Increase of admin from 7.5% to 10%
- Increase of income limit from 30% to 50% AMI for Homelessness Prevention component
- Eliminates matching requirement
- Allows deviation from applicable procurement standards when procuring goods and services to prevent, prepare for, and respond to coronavirus;
- Prohibits using any funds to require people experiencing homelessness to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services.
- No citizen participation or consultation requirements
- No minimum period of use for emergency shelters

The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning on the date of this memorandum. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.

ESG PROGRAM COSTS FOR INFECTIOUS DISEASE PREPAREDNESS

ESG recipients may use ESG Street Outreach and Emergency Shelter funds for essential supplies and services to reduce the spread of infectious disease in their programs.

	shelter environment will help to keep staff and participants healthy. Listed equipment that are eligible Shelter Operations costs, which could be useful to	
	Cleaning supplies such as bleach, disinfectant wipes, scrubbers, mops	
Supplies	Protective equipment such as masks, disposable gloves	
Supplies	Program participant needs such as bed linens, towels, hand sanitizer, soap, tissue packets	
Furnishings	Cots, room dividers	
Equipment	Washers, dryers, portable handwashing stations	
Transportation	Train or bus tokens, taxi or rideshare for program participant travel to and from medical care	
Street Outreach		
Engagement – Urgent physical needs	Hand sanitizer, soap, tissue packets, masks	
Engagement - Equipping staff	Masks, disposable gloves, hand sanitizer, other personal protective equipment	
Case management – Referrals	Coordinating medical care	
Transportation	Train or bus tokens, taxi or rideshare for program participant travel to and from medical care	
Expanded Staffing		

Note: Be sure to provide staff with training about precautions they can take to stay healthy, stop the spread of germs, and to stay home if they are feeling sick.

DEFINITIONS

Continuum of Care – The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers, victim services providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, developers, law enforcement and so forth, created to plan for and provide as necessary, a system of outreach, engagement and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Emergency Shelter – Any facility, with a primary purpose of providing temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

Homeless Management Information System (HMIS) – The information system designated by the Continuum of Care to comply with the HUD's data collections, management and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals, families and persons at risk of homelessness.

Program Participant - an individual or family who is assisted under ESG programs.

Recipient – any state, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into grant agreement with HUD to administer assistance under ESG.

Subrecipient – a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

HUD – US Department of Housing and Urban Development

Implementation Date:	September 14, 2020
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Convia Langeventh CA	Division Managar

Carrie Longsworth, CA Division Manager

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Director's Initials
& Date

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Emergency Solutions Grants (ESG) Program Applicable Requirements for Rental Assistance and Housing Relocation and Stabilization Services

ABOUT THIS RESOURCE

This matrix is designed to provide ESG recipients and subrecipients with a quick reference for assessing which ESG standards apply when providing rental assistance or housing relocation and stabilization services under the Rapid Re-Housing or Homelessness Prevention components of the ESG program. Recipients and subrecipients should always refer to the program regulations to ensure that they are in compliance with all requirements.

Standard	Rental Assistance	Housing Relocation and Stabilization Services	
Standard	Kental Assistance	Financial Assistance	Services
Fair Market Rent 24 CFR 576.106(d)	х		
Rent Reasonableness 24 CFR 576.106(d)	x		
Housing Standards 24 CFR 576.403(c)	x	x	х
Lead-based paint requirements 24 CFR 576.403(a)	x	x	X1
Lease between the program participant and landlord 24 CFR 576.106(g)	x		
Rental assistance agreement between the landlord and recipient or subrecipient 24 CFR 576.106(e)	x		
Maximum Amounts and Periods of Assistance (24- month cap in 3-year period) 24 CFR 576.105(c) & 576.106(a)	x	x	X²
Participation in HMIS³ 24 CFR 576.400(f)	x	x	x
Prohibition of use with other subsidies 24 CFR 576.104(d) & 576.106(c)	X ⁴	x	
Recordkeeping and Reporting Requirements 24 CFR 576.500	x	x	Х

¹ When providing *homelessness prevention services only* assistance – housing search and placement, housing stability case management, mediation, legal services, and credit repair – to keep a program participant *in the same unit*, a lead-based paint assessment is not required.

² Housing stability case management services cannot exceed 30 days during the period the program participant is seeking permanent housing. In addition, these services cannot exceed 24 months, not including the previous 30 days, during the period the program participant is living in permanent housing (24 CFR 576.105(b)(2)).

³ Excludes victim service providers and legal service providers, which must maintain a comparable database.

⁴ A one-time payment of rental arrears of the tenant's portion of the rental payment is permitted while the program participant is receiving another subsidy for rent.



Homeless Definition

	Category 1	Literally Homeless	 Written observation by the outreach worker; or Written referral by another housing or service provider; or Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; For individuals exiting an institution—one of the forms of evidence above and: discharge paperwork or written/oral referral, or written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution
CORDKEEPING REQUIREMENTS	Category 2	Imminent Risk of Homelessness	 A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> A documented and verified oral statement; <u>and</u> Certification that no subsequent residence has been identified; <u>and</u> Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
RDKEEPING I	Category 3	Homeless under other Federal statutes	 Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> Certification of no PH in last 60 days; <u>and</u> Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> Documentation of special needs <u>or</u> 2 or more barriers
RECOI	Category 4	Fleeing/ Attempting to Flee DV	 For victim service providers: An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. For non-victim service providers: Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and Certification by the individual or head of household that no subsequent residence has been identified; and Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	 (1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	lmminent Risk of Homelessness	 (2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	 (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	 (4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing

At Risk of Homelessness

CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	An individual or family who:
			(i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u>
			 (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; <u>AND</u>
			(iii) Meets one of the following conditions:
			(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u>
			(B)Is living in the home of another because of economic hardship; <u>OR</u>
			(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u>
			(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u>
			(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u>
			(F) Is exiting a publicly funded institution or system of care; <u>OR</u>
			(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

<u>Attachment 5</u>: Seminole County Comprehensive Plan Housing Element



HOUSING ELEMENT INTRODUCTION

The Housing Element is required by State Law. It must contain standards to be followed for provision of housing for all current and anticipated residents, elimination of substandard conditions, and provision of adequate sites for future housing. This element analyzes the general makeup of the Seminole County housing market and identifies issues and concerns related to housing in the County. Goals, objectives, and policies are then presented that address these issues and concerns. This element also projects future housing and construction needs.

As required by Chapter 163, Florida Statutes, and because Seminole County receives State and Federal affordable housing funds, this element also examines the housing needs of the County's lower income residents and those with special needs. The need to address Workforce Housing is also addressed in this element.

This element is divided into three sections: (1) background information on the County's housing, (2) an analysis of the need for additional housing and any specific housing issues that need to be examined, and (3) goals, objectives and policies, where a specific plan for ensuring the County's need for housing is presented.

OVERVIEW OF HOUSING MARKETS

Housing choice, especially for buyers, can be viewed as s a compromise between shelter and investment. A house is the average American family's single biggest lifetime investment. Location decisions also play a role in housing choice and entail a distance compromise between work, home and lifestyle. The average commuting time across the nation is approximately 24.3 minutes according to 2005 Census estimates. The average travel time to work in Florida is 24.8 minutes, and Seminole County workers travel an average 25.6 minutes according to Census estimates.

For parents with school children, the quality of the respective school district is often of critical concern. Real estate studies have repeatedly shown that high quality schools have a strong positive influence on residential property values. Other studies have presented evidence that nearby trails, greenways, and parks have a positive effect on property values. The availability of shopping and other services also add value to the community's housing stock. The reciprocity between employment and housing remains an area of much study and interest, however, all else remaining equal, households prefer to live closer to their jobs. For this reason, job creation and retention goals remain closely aligned with housing.

Many aspects of housing valuation can be affected by the actions of local government. As indicated, schools, commercial space, amenities, and jobs all influence the local housing market. If one of the key tenants of good government is growth in property values and good neighborhoods, then both government and its citizens have common cause in working together.

THE SEMINOLE COUNTY HOUSING MARKET

Seminole County is located north of Orlando along the Interstate 4 corridor. Historically, the County has served as a suburb (i.e., "bedroom/commuting community") for Orlando. However, Seminole County's role as a bedroom community within the region has undergone substantial change. In 1990, two-thirds of the County's workforce left the County to go to work every morning, by 2005, this trend has almost reversed with approximately 63.2% of the workforce both living and working within the County.

The County's school district became one of the few districts to adopt impact fees. By 1995, its sustained focus on academics had made the district one of the best in Florida. In a Newsweek





national ranking, all of Seminole County's high schools ranked in the top 3% nationwide. Good schools are now a major factor in corporate relocation, crossing over into economic development.

The County's expressway and interstate highway system, and the new Central Florida Commuter Rail System will efficiently connect Seminole County with the larger region. These connections generated continued growth into the center of the County. However the County's eastern Rural Area will remain out of the County's urban services boundary as part of the County's rural conservation efforts and remain largely low density/rural into the future.

Collectively, the combination of location and wise community self-investment have now made Seminole County the corporate and residential regional location of choice in Central Florida. Over the long-run, rising property values and a relatively strong residential development market are still expected in Seminole County despite the statewide slowdown in housing activity in 2006-2008.

This element documents these changes, assesses the impacts these changes have on the County's housing market, and recommends actions the County will need to take to support the long-term appreciation of the County's housing stock. In addition, this element addresses the need for obtainable housing opportunities and choices in support of the principles of the Central Florida Regional Growth Vision ("How Shall We Grow?").





HOUSING ELEMENT ISSUES AND CONCERNS

Issue HSG 1 Sufficient Residential Land with Supporting Infrastructure

While Seminole County is concurrent on all infrastructure, current land use projections indicate that sometime near the end of the year 2025 planning horizon the County's housing growth will need to occur on infill and redevelopment parcels as the availability of vacant residentially zoned land will be substantially diminished.

Issue HSG 2 Affordable Housing for Low and Moderate Income Residents

Historically, a strong local economy, rising wages, low interest rates and an ample housing stock kept Seminole County's housing prices affordable. This has led the Board of County Commissioners to traditionally focus its affordable housing programs on helping its low and very low income households (those with incomes less than 80% of area median income.) However, a rapid increase in home prices had occurred since 2001, which made housing less affordable to households earning moderate incomes (incomes less than 120% of area median income). The area's rapid escalation in home prices at that time encouraged the County to reexamine its traditional focus on helping only lower income households, and begin extending tools to encourage the provision of housing for moderate income households. As of 2010, housing values do not reflect the same rapid escalation. The average just valuation for a single family house in 2009, for example, had declined to \$206,853. The median just valuation was \$172,242 for that same time period. The average just valuation of a condominium in 2009 was \$80,724; while the median just valuation was \$70,645. The Property Appraiser anticipates a 15% decline in property values during 2010. Although credit rules have become more stringent, it is possible that the lower values of housing may assist moderate income households to enter the Seminole County housing market. Seminole County shall continue its efforts to encourage redevelopment efforts that include a variety of housing types and values, in order to ensure availability of housing for the County's low and moderate income households.

Issue HSG 3 Workforce Housing

Seminole County has much to be proud of, such as great neighborhoods, a solid job market, and good schools. However, along with almost every region of the State, the ability to secure good quality housing at a cost that is not a burden has become a challenge for many working households in Seminole County.

For the year ending in July 2006, the Orlando metropolitan area, which includes Seminole County, created 41,000 new jobs. This brisk rate of job growth has been sustained for some time considering that MetroPlan Orlando added nearly 100,000 new jobs during the two year period between 2004 and 2005. In summary, the workforce housing crisis at that time was the result of the widening gap between wage income and housing prices. In 2000, the area median income level represented approximately 45% of the cost of a median priced home (i.e., median income divided by median home price). In 2006, the area median income represented just 22% of the cost of a



median priced home price. The combination of rapidly increasing home prices, sluggish wage increases, and robust job growth were among the causes of the dilemma. As noted above, current housing costs (2009-2010)have declined, which may assist in addressing the issue.

Section 163.3177(6)(f)(1)(j), Florida Statutes, requires counties in which the gap between the buying power of a family of four and the median County home sales price exceeds \$170,000, by July 1, 2008, to adopt a workforce housing plan that, at a minimum, identifies adequate sites. Analysis by the Florida Housing Finance Corporation, contained in the Support Document, demonstrates that this does not apply to Seminole County. A similar analysis completed in 2010 showed that this again does not apply to Seminole County. However, the County does recognize the need for opportunities to create a range of obtainable housing opportunities and choices consistent with the principles of "How Shall We Grow?".

The ability to house our community's workforce is an important objective. The workforce we are addressing includes many essential service workers such as teachers, police officers, firefighters, and health care workers. There is no question that these workers provide community wide benefit. Furthermore, the ability to supply quality housing for our workforce will pay off economically. A diverse and well qualified labor force will help attract and retain businesses as well as provide for an economic diversity that will help insulate our area from economic downturns. Recognizing these benefits, it is important to develop incentive based tools to encourage the provision of workforce housing.

Issue HSG 4 Deteriorating and Aging Housing

Statistical analyses and surveys of the County's housing stock have found that the incidence of aging/deteriorating housing within Seminole County is less than half the statewide rate (approximately 3% of the stock). The County has rehabilitation, emergency repair and reconstruction programs in place to address these units. The foreclosures during the 2009 – 2010 time period are creating instances of code violations, but not deterioration of the housing stock. County code enforcement efforts underway during 2010 are anticipated to lessen this problem, which will be reduced as the housing market recovers.

Issue HSG 5 Modular Housing, Mobile Homes/Manufactured Housing

In 1993, Seminole County amended its Land Development Code to reduce the minimum parcel size for modular housing developments and to allow modular housing as a conditional use in all residential zoning districts. Despite these incentives, the number of modular housing units within the County declined by 20% since 1990, indicating a strong market-driven preference toward site-built housing. The County's 2008 Evaluation and Appraisal (EAR)-based amendments allowed for mobile homes/manufactured housing as permitted uses on parcels with Rural-3, Rural-5, and Rural-10 future land use designations. In addition, the 2008 EAR-based amendments permitted modular units on parcels with a land use designation of Low Density Residential.





Issue HSG 6 Relocation

Seminole County, as required by Federal law (for jurisdictions receiving federal funding), has long-standing relocation policies. In addition, the State of Florida has a condemnation law that ensures residents or businesses displaced by governmental action are more than amply compensated.

Issue HSG 7 Group Homes

In 1995, Seminole County amended its Land Development Code to adopt location siting criteria and to allow group homes as a conditional use in all residential zoning classifications as required by State law.

Issue HSG 8 Historic Preservation

In 1995, Seminole County updated its master file of historically significant properties. The vast majority of the County's historic structures are located within the County's two designated historic districts in Sanford and Longwood. Both districts are currently being restored and it is anticipated that within 10 years all the County's historic properties will have been restored.

Issue HSG 9 Homelessness

Seminole County and its nonprofit service organizations provide a broadrange of services to assist its homeless populations and to prevent homelessness. The County has partnered with the Regional Commission on Homelessness and since 1989, the County has expanded its shelter bed count (including a new facility for victims of spouse abuse and another new facility for homeless women and children) and recently funded a program to provide transitional housing for homeless families. The County has formed a Continuum of Care with its social service agencies to provide a full-range of services to homeless persons and families, including rental assistance combined with other support services.







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HOUSING ELEMENT GOALS, OBJECTIVES AND POLICIES

GOAL

Ensuring adequate affordable housing for all current and anticipated residents of Seminole County by maintaining a high quality residential housing stock and encouraging the use of renewable energy resources in residential development.

OBJECTIVE HSG 1 PRIVATE SECTOR HOUSING DELIVERY

The County shall continue to support private sector housing production capacity sufficient to meet the housing needs (market demand) of existing and future residents.

Policy HSG 1.1 Streamlined Development Review

The County shall continue the reduction of financing costs for residential developers by maintaining its streamlined development approval process through organizational and computer enhancements.

Policy HSG 1.2 Expedited Affordable Housing Review

The County shall continue to provide an expedited priority for all projects meeting the definition for affordable or workforce housing development throughout the development review process.

Policy HSG 1.3 Federal/State/Local Program Impact

The County shall continue the existing State-mandated process of reviewing new federal, State and local housing regulations to determine their impacts on the cost of local housing production (and especially the impact on housing for very low and low income households).

Policy HSG 1.4 Parcel Location Assistance

The County shall assist developers (and especially affordable housing developers) in locating appropriate parcels for housing development through the existing "Future Land Use and Committed Land Use" publication and by updating the vacant land use, acquisition area and infrastructure maps and inventories on a periodic basis. *Policy HSG 3.6 County Owned Property* addresses Chapter 125.379, Florida Statutes, requirements regarding disposition of county property for affordable housing.

Policy HSG 1.5 Affordable and Workforce Housing Developments

The County shall provide incentives for building a variety of affordable and workforce housing types at appropriate densities on lands allowing residential and mixed-use development, in locations near public transit facilities and the SunRail stations.





Policy HSG 1.6 Infill Development

The County shall incentivize a range of housing types, including affordable and workforce housing, on infill and redevelopment parcel areas, especially in proximity to public transportation and SunRail stations. Performance frameworks in the Land Development Code must ensure compatibility with surrounding areas.





OBJECTIVE HSG 2 HOUSING STOCK PRESERVATION

The County shall encourage the improvement and continued viability of existing neighborhoods.

Policy HSG 2.1 Clearance Program

The County shall continue to eliminate vacant dilapidated housing as soon as practical through the continuation of code enforcement activities using Federal resources including the demolition of dilapidated structures, when appropriate.

Policy HSG 2.2 Rehabilitation

The County shall improve the existing housing stock on a countywide basis by continuing the use of Community Development Block Grant, HOME Investment Partnerships and State Housing Initiatives Partnership Program funds.

Policy HSG 2.3 Homeowner Assistance

The County shall continue to encourage individual homeowners to increase private reinvestment in housing by providing information on available programs; providing technical assistance and by continuing the use of Community Development Block Grant funds for infrastructure improvements and community facilities in lower income neighborhoods.

Policy HSG 2.4 Development Performance Framework

The County shall maintain compatibility between new developments and existing neighborhoods through the application of land use intensity and performance frameworks.

Policy HSG 2.5 Public Awareness Programs

The County shall continue its public awareness program for the County's Municipal Services Benefits Unit Program.



OBJECTIVE HSG 3 AFFORDABLE HOUSING

The County shall continue efforts to provide adequate housing development for very low, low, and moderate income households, the elderly, and rural and farm worker households.

Policy HSG 3.1 Adequate Sites for Affordable Housing

The County shall work with and meet with affordable housing providers (both for-profit and non-profit) on a regular basis to assist in the identification and location of adequate sites for affordable housing within the County's lower income areas.

Policy HSG 3.2 Housing Information Service

The County shall continue to make available land use, housing and housing agency services information to assist both very low and low income households (including homeless persons and families) in finding adequate housing and/or shelter (including emergency shelter, if applicable), and to assist nonprofit developers in locating suitable development sites for both very low and low income housing.

Policy HSG 3.3 Affordable and Workforce Housing Density Bonuses

The County will continue to evaluate potential Comprehensive Plan and Land Development Code amendments regarding provisions designed to encourage a range of obtainable, affordable and workforce housing opportunities and choices. In addition, the County shall continue to enforce the Land Development Code provisions relating to Alternative Density Options authorized by this Policy that encourage development of affordable housing opportunities. The Land Development Code shall implement this Policy by including provisions for:

- A. Allowing development up to seven dwelling units per net buildable acre on sites with Low Density Residential Future Land Use designation, up to 12 dwelling units per net buildable acre on sites with Medium Density Residential, and up to 22 dwelling units per net buildable acre on sites with High Density Residential Future Land Use designation. Increases in density within the Mixed Development Future Land Use designation shall be considered consistent with Policy 5.15. Increases in density shall be considered consistent with Policy FLU 5.17 within the Urban Centers and Corridors Overlay;
- B. Providing that density bonus on a sliding scale based on the percent of units priced for low and very low income households provided on the development site;
- C. Allowing reduced lot sizes and reduced open space requirements for shared community recreational amenities, reduced setbacks or build-to lines, zero-lot line, as well as clustered developments;
- D. Allowing reduced lot sizes and reduced open space requirements for shared community recreational amenities, reduced setbacks, zerolot line, duplex, triplex, quadplex and low rise (two story) apartments, as well as clustered developments;
- E. Allowing reduced lot sizes and reduced open space requirements for shared community recreational amenities, reduced setbacks, low rise, midrise and highrise affordable and workforce developments





within the High Density Residential and Mixed Development Future Land Use designations, and within the Urban Centers and Corridors Overlay;

- F. Providing standards to ensure the integration of conventional market rate units and affordable and workforce units to prevent the undue concentration of lower income units within the development site;
- G. Ensuring that units intended to be affordable are not distinguishable from the market rate units;
- H. Requiring compatibility of the development with surrounding neighborhoods;
- 1. Requiring a binding agreement as part of the Development Agreement to ensure the percentage of units intended to meet the needs of the low and very low income buyers and renters are delivered and remain available to qualified households when units change occupancy; and Enabling child day care, community center, small scale (neighborhood scale) retail and/or personal service, tutoring and office uses as accessory uses to the development when intended to serve the needs of the occupants of the development within the Medium Density Residential Future Land Use designations; allowing these uses as permitted uses for developments within the High Density Residential and Mixed Development Future Land Use designations, and within the Urban Centers and Corridors Overlay.





Policy HSG 3.4 Elderly Housing

The County shall increase the supply of housing suitable for and affordable by elderly households by continuing to support State Housing Initiatives Partnership, HOME Investment Partnerships, Orange County Housing Finance Authority and Florida Housing Finance Corporation-financed projects. Affordable housing for the elderly shall be encouraged in the East Altamonte neighborhood to meet the needs of existing residents wishing to remain in that neighborhood.

Policy HSG 3.5 Farm Worker Housing

The County shall, based on market demand, work to provide a sufficient number of decent, safe, sanitary and affordable farm labor housing units for migrant farm workers as a conditional use in certain zoning classifications, subject to special criteria.

Policy HSG 3.6 County Owned Property

Beginning in 2007, and every three years thereafter, the County shall prepare an inventory list of all real property within its jurisdiction to which the county holds fee simple title that is appropriate for use as affordable housing. The properties identified as appropriate for use as affordable housing on the inventory list adopted by the County may be:

- A Offered for sale and the proceeds used to purchase land for the development of affordable housing; or
- B Used to increase the local government fund earmarked for affordable housing; or
- C May be sold with a restriction that requires the development of the property as permanent affordable housing; or
- D May be donated to a nonprofit housing organization for the construction of permanent affordable housing; or
- E The County may otherwise make the property available for use for the production and preservation of permanent affordable housing.





OBJECTIVE HSG 4 WORKFORCE HOUSING

The County shall provide incentives to increase, and shall maintain, the supply of workforce housing.

Policy HSG 4.1 Employer Assisted Housing

The County shall engage and partner with major employers in regard to providing housing assistance to eligible employees. Strategies available to the County include partnering with private organizations in recruitment efforts, extending education to organizations on available programs, and pursuit of public/private partnerships that leverage resources such as the State's Community Workforce Housing Innovation Pilot Program.

Policy HSG 4.2 Optional Nonresidential Intensity Bonuses and Workforce Housing

The Seminole County Land Development Code shall be amended to implement *Policy FLU 5.15 Mixed-Use Developments* of the Future Land Use Element of the Seminole County Comprehensive Plan, which will permit a commercial intensity bonus (typically measured in units of Floor Area Ratio, or FAR) in the Mixed Development future land use designation in exchange for providing workforce housing units as part of a mixed-use development. This intensity bonus is intended to provide an incentive to developers for providing workforce housing in locations where it is deemed both desirable and advantageous to Seminole County, and to enable the County to ensure a range of obtainable housing opportunities and choices in support of the Central Florida Regional Growth Vision.

Policy HSG 4.3 Workforce Housing in Economic Development Target Areas

New housing developments located within any of the economic development target areas identified in the Comprehensive Plan shall ensure that 15% of the project's housing (rental or owner occupied) will be obtainable by employees earning the average wage within the subject Economic Development Target Area. Exceptions shall be granted in cases where the applicant demonstrates that an adequate supply of workforce housing exists within close proximity, or insufficient market support exists for workforce housing within the subject target area.

Policy HSG 4.4 Mixed Residential Development

By January 1, 2012, the County shall develop and adopt into the County's Land Development Code a Mixed Residential Zoning District that shall allow for a full-range of housing types (e.g., condominiums, town homes, single family) to be developed, by right, within the same project.





OBJECTIVE HSG 5 PUBLIC PRIVATE PARTNERSHIP

The County shall continue to develop joint partnerships with the private sector through Federal and State housing subsidy programs and other local initiatives.

Policy HSG 5.1 Affordable Housing Trust Fund

The County shall continue to maintain its Federal/State-funded Affordable Housing Trust Funds to purchase and "write down" the cost of land, impact fees, supporting infrastructure, and other supplement housing delivery costs as a means of encouraging for-profit and nonprofit developers to build and otherwise provide housing for very low and low income households.

Policy HSG 5.2 Finance Authorities

The County shall provide affordable housing financing assistance for both single family and multifamily units and developments by continuing to participate with the Orange County Housing Finance Authority, local housing authorities and the Florida Housing Finance Corporation, when appropriate.

Policy HSG 5.3 Homeless Assistance

The County will continue to use Emergency Shelter Grants Program funding and other appropriate funding earmarked for homeless assistance to provide financial, food and shelter assistance to individuals and families, provide assistance for homeless persons to make the transition to permanent homes and to prevent homelessness. The County will continue to cooperate with the Regional Commission on Homelessness.





OBJECTIVE HSG 6 HISTORIC HOUSING

The County shall promote the identification, evaluation, preservation and protection of historically significant properties, including nonresidential structures.

Policy HSG 6.1 Master Site File Update

The County shall periodically update the County's portion of the Florida Master Site File by continuing to assist the Department of State Division of Historical Resources efforts in this regard.

Policy HSG 6.2 Historic Housing Identification

The Housing Information Service shall continue to assist property owners in the identification of historically significant housing and in locating, applying for and using any State and federal assistance programs, including rehabilitation and adaptive reuse programs.





OBJECTIVE HSG 7 MODULAR HOMES AND MANUFACTURED/MOBILE HOMES

The County shall provide sufficient and appropriate sites for manufactured/mobile home housing and permit modular homes on residentially zoned property.

Policy HSG 7.1 Zoning Classifications and Future Land Use Designations

The County shall continue to allow modular homes as a permitted use in all single family residential zoning classifications. Manufactured/mobile homes shall continue to be allowed subject to applicable Land Development Code provisions, and shall be allowed as permitted uses in the zoning classifications associated with Rural-3, Rural-5 and Rural-10 Future Land Use designations.





OBJECTIVE HSG 8 DISPLACEMENT/RELOCATION

The County shall continue to provide a fair and lawful method to insure uniform treatment for households and businesses displaced by County programs.

Policy HSG 8.1 Policy Plan

The County shall continue to maintain a federally mandated and locally enforced anti-displacement and relocation assistance policy plan that insures that reasonably located standard and affordable replacement housing is offered to persons displaced through County action or County funding prior to their displacement.





OBJECTIVE HSG 9 GROUP AND FOSTER HOMES

The County shall provide sufficient sites and provisions for group homes and foster homes.

Policy HSG 9.1 Group Homes

The County shall continue to allow for the development of non-exempt group homes as a conditional use within all single family residential zoning districts.

Policy HSG 9.2 Foster Homes

The County shall encourage residential alternatives to institutionalization by maintaining State-mandated non-discriminatory standards and criteria regarding the location of foster homes licensed by the Florida Department of Children and Families.

Policy HSG 9.3 Design Standards

The County shall maintain State-mandated group home placement criteria to ensure the maximum compatibility between group homes and conventional residential development.





OBJECTIVE HSG 10 HOUSING PROGRAM IMPLEMENTATION

The County, in conjunction with its partners, will take a proactive role in formulating an effective affordable housing program.

Policy HSG 10.1 Housing Program Implementation

The County's Community Services Department shall continue to be the lead agency to formulate a coordinated affordable housing development and assistance program and administer the County's various housing and community development/redevelopment activities.





OBJECTIVE HSG 11THE USE OF RENEWABLE ENERGY RESOURCES IN RESIDENTIAL DEVELOPMENT

The County, as required by the enactment of House Bill 697 in 2008, shall support the use of renewable energy resources in residential development.

Policy HSG 11.1 Renewable Energy Resources in Residential Development

The County shall ensure that its Building Code complies with energy conservation requirements of Florida Statutes for residential construction. In addition, the County shall not enter into a deed restriction, covenant, declaration, or similar binding agreement, nor shall it approve a condominium development with similar agreements, that prohibits or has the effect of prohibiting solar collectors, clotheslines or other energy devices based on renewable resources. Condominiums may determine the specific location where solar collectors may be installed on a roof, as long as such determination does not impair the effective operation of the solar collector.







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<u>Attachment 6</u>: Seminole County Institutional Delivery Structure

SP-40 Institutional Delivery Structure – 91.215(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
Seminole County Board of County Commissioners	Government	Economic Development Non-homeless special needs Ownership Planning Rental Neighborhood Improvements Public Facilities Public Systems	Jurisdiction
Seminole County Community Services Department	Government	Planning Economic Development Homelessness Non-Homeless Special Needs Ownership Rental Neighborhood Improvements Public Facilities Public Services	Jurisdiction
Seminole County Housing Authority	РНА	Public Housing	Jurisdiction Other
Sanford Housing Authority	РНА	Public Housing	Jurisdiction Other
Central Florida Commission on Homelessness Continuum of Care (CoC)	Non-Profit Organization	Homelessness	Jurisdiction
Health Services Network of Central Florida	Non-Profit Organization	Homelessness	Jurisdiction
Florida Department of Health Seminole County	Sub-recipient	Community Development: Public Services	Regional

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System:

Under the direction of the Seminole County Assistant County Manager, the Community Services Department is overseen by a Department Director. The Community Services Director is responsible for the Community Assistance Division, Community Development Division, and Compliance Office. The staff within Community Services supervises the staff as well as the division managers. There is coordination between staff for each of the federally funded programs administered by the Community Development Division. There is a Compliance Office and a Business Office that assist Community Development with monitoring the internal financial controls in place for each of the federally funded programs, as well as the subrecipients (CHDOs, Non-Profit Organizations) who directly benefit from and provide services with the federal funding allocations.

The Seminole County Board of County Commissioners reviews progress reports and approves proposed funding models submitted by the Seminole County Community Services Department prior to federal funding being expended. The Community Services Department provides direct federal funding to several local and regional non-profits who provide direct housing and supportive services which assist in achieving Seminole County's goals and objectives. All approved non-profit service providers are required to follow federal program requirements in accordance regulations set forth by HUD, the State of Florida, and Seminole County BOCC. To ensure programs are managed in accordance with all federal and internal requirements, all non-profit service provider partners who receive funding are routinely monitored by the Seminole County Community Services Department.

Another strength is the County's ability to effectively partner with other local and state organizations. One of the County's strongest partnerships is with the Florida Department of Health. The Department of Health serves on several of the County's health councils that address health services for very low-income persons and could potentially seek public services funding again during this Consolidated Plan Period.

Strengths in the institutional delivery system also include internal checks and balances, expansion of local outreach, and capacity to successfully achieve all goals and objectives described in the Strategic Plan section of this Consolidated Plan.

A current gap in the delivery system is the lack of Community Housing Development Organization's (CHDOs) to carry out affordable housing activities. The County is in partnership with HANDS of Central Florida to expend older CHDO funds. In addition to HANDS, the County is currently working with other non-profit organizations who have expressed the desire to become a CHDO with the hope of having 1-2 active CHDOs in Seminole County in the future. It is a priority of Seminole County to consistently assess the strengths and gaps in the institutional delivery system, by conducting audits of internal policies and procedures, in order to ensure that potential weaknesses are identified and addressed to ensure that all federal program funds are being spent timely and within compliance.

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

Homelessness Prevention	Available in the	Targeted to	Targeted to People	
Services	Community	Homeless	with HIV	
Homelessness Prevention Services				
Counseling/Advocacy		Х		
Legal Assistance				
Mortgage Assistance	Х			
Rental Assistance		Х		
Utilities Assistance	Х	Х		
Street Outreach Services				
Law Enforcement				
Mobile Clinics	Х			
Other Street Outreach Services		Х		
Supportive Services				
Alcohol & Drug Abuse	Х			
Child Care	Х			
Education	Х			
Employment and Employment	x	х		
Training	^	Λ		
Healthcare	Х	Х		
HIV/AIDS				
Life Skills	Х			
Mental Health Counseling	Х	Х		
Transportation	Х			
Other				
Other				

 Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

ESG funding is allocated on an annual basis to local, nonprofit organizations that provide services to persons experiencing homelessness. To support the housing crisis response system through emergency shelter operations and maintenance activities, the Seminole County Community Services Department allocates a specific amount of ESG funding each year, within the county limits, serving persons experiencing homelessness. As a recognized effective permanent housing solution, rapid rehousing for families who are homeless within the county limits is funded with a specific amount of ESG funding each year by the Department.

There are a variety of services that homeless persons could access through the Seminole County Health Department, services designed for children's health, men's health, immunizations, etc., note that these programs are not limited to persons who are homeless. Programs and services offered at the Health Department include clinical and nutrition services, wellness programs, and infectious disease services. In addition, the Seminole County School Board's Families in Need (FIN) Program targets students experiencing homelessness and their families. This program is designed to attain a steady living environment for the family and can include a variety of services and referrals to needed services such as employment services and remove educational barriers for the student through access to their public education. Persons with HIV can access services through the Seminole County Health Department, including testing, prevention education, and assistance programs for those with HIV/AIDS.

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.

Homeless Services Network of Central Florida, the Homeless Continuum of Care responsible for coordinating the housing crisis response system in Seminole County, maintains all Point-in-Time (PIT) Counts for persons experiencing homelessness within the jurisdiction. However, the Homeless Services Network's region is comprised of Orlando, Orange, Osceola, and Seminole Counties and therefore, the PITs are a combination of region.

By providing direct funding to local non-profit agencies whose expertise is focused on supportive services and housing for persons experiencing homelessness, the County can ensure that the families and individuals benefitting from the activities are the most in need of the services. The County does not collect and maintain the latest data that reports the number of persons experiencing homeless within Seminole County, it is beneficial to partner with non-profit homeless service providers to ensure that the funds are being spent efficiently and in accordance with nationally recognized best practices. The Seminole County Community Services

Department, supplementing the work of local direct service providers, provides direct supportive services to the persons with special needs who reside in the county through internal programs. Persons with special needs can access an array of services either through the county or a community-based organization, centered around their need, which is a strength.

The County partners with the Florida Department of Health to carry out public services for lowincome, special needs, and homeless populations. Seminole County has funded Health Department programs with general fund dollars including a dental program, food pantry, mobile clinics, and youth programs. The Health Department has also received CDBG funds for diabetes testing and wellness programs.

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.

The staff within the Seminole County Community Services Department is responsible to provide direct technical assistance to subrecipient partners who are authorized to carry out activities that specifically benefit persons with special needs. The Department and its staff work with the Compliance Office to monitor subrecipients' progress and expenditures periodically, providing any necessary technical assistance in the event that a potential problem or a finding is discovered through the monitoring activities.

This strategy for overcoming gaps in the institutional delivery structure has proven beneficial for Seminole County and will be amended in the event that a gap is determined in the future. The County, in conjunction with the municipalities, elected officials, citizens, non-profit agencies, and for-profit organizations, will continue networking and trying to assess what resident need and how best to meet those needs. Keeping the private and public sector aware of all services provided will be a key objective for the County.