

8.15.19
Amended 4.23.20

City of Pompano Beach FY 2019 CDBG Annual Action Plan

FIRST SUBSTANTIAL AMENDMENT TO THE FY 2019-2020 CDBG Annual Action Plan



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Annual Action Plan
2019

1

A special CDBG allocation in the amount of \$613,463 in CDBG-CV funds was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis. These CDBG-CV funds will be used to increase our public service and administration activities. Specifically, the funds will be used address the following Public service activities: Emergency Rental and Mortgage assistance, and the City's Senior Meals on Wheels program.

Executive Summary

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

1. Introduction

During the 2019-2020 fiscal year, the City of Pompano Beach will receive \$1,007,279 in CDBG program funding. The City anticipates allocating \$554,731 towards Homeowner Occupied Rehabilitation and Habitat Redevelopment Activity through the Office of Housing and Urban Improvement's (OHUI) internally administered Housing Rehabilitation and Emergency Repair programs. The City anticipates allocating \$151,092 (the 15 percent maximum allowable amount) towards Public Services including mental health counseling, health care services, and other supportive services to eligible beneficiaries, through approved non-profit organization partners. \$100,000 will be used toward Economic Development Activities. The remaining \$201,452 CDBG annual allocation will be used toward Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG program. **A special CDBG allocation in the amount of \$613,463 was authorized by the Coronavirus Aide, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis. These CDBG-CV funds will be used to increase the funding to the City's current public service activities. Specifically, the City of Pompano Beach anticipates allocating \$340,771 towards Emergency Rental Assistance and \$100,000 towards Mortgage Assistance for Habitat for Humanity homeowners, an additional \$50,000 towards the City's Senior Meals on Wheels Program, and the remaining \$122,692 will be applied to Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG-CV (CARES Act) allocation.**

During the 2019-2020 fiscal year, the City of Pompano Beach will receive \$402,495 in HOME program funding. The City anticipates allocating \$236,261 towards the City's internal First Time Homebuyer Program, which provides direct purchase assistance to eligible first-time homebuyers. The City anticipates allocating \$88,397 (the required 15 percent of the total allocation, including prior years) towards eligible HOME program activities administered by a City approved Community Housing Development Organization (CHDO). Eligible HOME activities include acquisition for rehabilitation/resale/rental, new construction for resale/rent, and purchase assistance. The remaining

\$40,249 HOME allocation will be used toward Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the HOME program.

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.

The programs and activities described in this Action Plan are developed with three primary objectives, 1) providing benefits to the low- and moderate income individuals, and households, 2) providing benefits to neighborhoods with high concentrations of low- and moderate income residents, and 3) benefits to the City as a whole. The City will also use the plan to coordinate its efforts with other federal, state, and local grant programs to produce decent housing, a suitable living environment and increase economic opportunities in the community. Affordable Housing needs will be addressed through CDBG and HOME Administration of Housing Rehabilitation, Emergency Repair, Purchase Assistance, **Public Service activities** and CHDO Assistance Programs. Non-Housing Community Development will be supported through Public Service Public Facility and Improvement Programs.

The City works to provide information and referrals to the many service providers and organizations in Broward County. The affordable housing, public services and economic development goals and objectives identified in this strategic plan of the Consolidated Plan target all low to moderate income areas and persons in order to create or sustain affordable housing, provide supportive services necessary to create decent living environments, and create economic opportunities throughout the City; all of which are measures of reducing poverty and creating empowerment for the residents of Pompano Beach.

3. Evaluation of past performance

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

The City's Annual Action Plans and CAPERs (Consolidated Annual Performance and Evaluation Report) details the City's accomplishments in meeting the goals and priorities established in the Consolidated Plan. The City's CAPERs may be viewed at: www.pompanobeachfl.gov

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

The U.S. Department of Housing and Urban Development (HUD) has implemented a mandatory standard performance measurement system for community planning and development formula grant programs. The system is designed to measure performance under each project and activity through specific outcomes.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City's current CDBG Citizen Participation Program is structured through the Community Development Advisory Committee (CDAC) of seven (7) residents of the City who are appointed by the City Commission and City Manager. This Committee holds public meetings to receive citizen input on housing and community development needs before recommending activities for funding with annual CDBG and HOME allocations. They also participate in program amendments and program performance evaluations. The major work of the CDAC is conducted between December and June of each program year, with notice of each meeting posted and attendance open for observation and comment. The CDAC reviews all proposed activities and makes recommendations to the City Commission for final approval.

Substantial Amendment #1 for CARES Act funding:

Given the need to expedite actions to respond to COVID-19, HUD waived 24 CFR 91.105(c)(2) and (k), in order to balance the need to respond quickly to the growing spread and effects of COVID-19. The substantial amendment to the FY 2019-2020 Annual Action Plan was published in the Sun Sentinel with a 5-day comment period beginning on May 4, 2020 and ending on May 8, 2020. A public hearing on the substantial amendment was held on May 26, 2020.

5. Summary of public comments

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

At its April 11th Public Meeting, the Community Development Advisory Committee heard presentations from CDBG Public Service applicants in order to make Public Service and other funding recommendations as part of the FY 2019-2020 Annual Action Plan. The Committee subsequently met with Staff in a Public Meeting on May 16, 2019 at which agreement was reached on the funding recommendations contained in the FY 2019-2020 Annual Action Plan. OHUI requests approval of the Plan so that it can be advertised for the required 30-day public comment period and submitted to HUD by its August 15, 2019 filing deadline.

No public comments were received.

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

No public comments were received

7. Summary

The City of Pompano Beach understands the importance of citizen participation on the Annual Action Plan process. Citizen participation and stakeholder consultation are key components of the Plan. A well-designed citizen participation and consultation strategy was used to:

- Gather input on priority needs and target area
- Increase coordination among consultation partners
- Leverage Consolidated Plan activities with other public and private funding sources and programs
- Expand upon the outreach efforts of existing planning processes
- Increase citizen feedback, buy-in, and support of Action Plan activities

The citizen participation plan process provided important feedback from stakeholders and citizens and helped to shape the goals and objectives outlined in this Annual Action Plan.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	POMPANO BEACH	Office of Housing and Urban Improvement
HOME Administrator	POMPANO BEACH	Office of Housing and Urban Improvement
ESG Administrator	POMPANO BEACH	Broward County Housing Finance

Table 1 – Responsible Agencies

Narrative (optional)

N/A

Consolidated Plan Public Contact Information

Office of Housing and Urban Improvement

100 W. Atlantic Blvd, Suite 220

Pompano Beach, FL 33060

Phone (954) 786-4659

Website: www.pompanobeachfl.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Pompano Beach Public Housing Authority and the Broward County Housing Initiative Partnership are responsible for the coordination of these activities between public and assisted housing providers.

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))

The City of Pompano Beach will continue many of the projects begun in the last Five-Year plan. The activities will include providing assistance to senior citizens, services for individuals with disabilities, providing shelters for victims of domestic violence and services for children.

Supportive services provided at many of these facilities include: individual needs assessment, crisis counseling, food and nutritional counseling, individual and group counseling, self-esteem classes, substance abuse counseling and treatment, benefits counseling and advocacy, individual case planning, budget counseling, medication management, money management, mental health treatment, transportation and recreational/social activities.

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.

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

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.

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 City of Pompano Beach does not administer any federally funded grant programs or implement activities that provide services that are targeted to special needs populations, including homeless persons. Broward County is the grantee for ESG funding and decides the goals and objectives that address the needs of the homeless population in Pompano Beach.

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, groups, organizations who participated

1	Agency/Group/Organization	Broward County Homeless Initiative Partnership
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Other government - County Other government - Local Planning organization Grantee Department Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	There were no agency types not consulted during this process.
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Identify any Agency Types not consulted and provide rationale for not consulting

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Broward County Homeless Initiative Partnership	See AP 65

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

N/A

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

The City's current CDBG Citizen Participation Program is structured through the Community Development Advisory Committee (CDAC) of seven (7) residents of the City who are appointed by the City Commission and City Manager. This Committee holds public meetings to receive citizen input on housing and community development needs before recommending activities for funding with annual CDBG and HOME allocations.

The summary of the Action Plan was posted on the City's website and published in the newspaper of general circulation on July 1, 2019. The thirty (30) day comment period took place between July 1, 2019 and August 1, 2019.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Notice to all meeting and public hearings	We had more than 15 people in attendance but no comments	No comments were received	N/A	http://pompanobeachfl.gov/assets/docs/pages/ohui/2019-2020%20NOTICE%20OF%20FUNDS%20AVAILABILITY%20(NOFA).pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community Community	Public hearing more than 15 people attended the meeting	No comments received	N/A	http://pompanobeachfl.gov/assets/docs/pages/ohui/2019-2020%20NOTICE%20OF%20FUNDS%20AVAILABILITY%20(NOFA).pdf

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

During the 2019-2020 fiscal year, the City of Pompano Beach will receive \$1,007,279 in CDBG program funding. The City anticipates allocating \$514,731 towards Homeowner Occupied Rehabilitation through the Office of Housing and Urban Improvement's (OHUI) internally administered Housing Rehabilitation and Emergency Repair programs. The City anticipates allocating \$151,092 (the 15 percent maximum allowable amount) towards Public Services including mental health counseling, health care services, and other supportive services to eligible beneficiaries, through approved non-profit organization partners. The remaining \$201,456 CDBG annual allocation will be used toward Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG program. A special CDBG allocation in the amount of \$613,463 was authorized by the Coronavirus Aide, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis. These CDBG-CV funds will be used to increase the funding to the City's current public service activities. Specifically, the City of Pompano Beach anticipates allocating \$340,771 towards Emergency Rental Assistance and \$100,000 towards Mortgage Assistance for Habitat for Humanity homeowners, an additional \$50,000 towards the City's Senior Meals on Wheels Program, and the remaining \$122,692 will be applied to Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG-CV (CARES Act) allocation.

During the 2019-2020 fiscal year, the City of Pompano Beach will receive \$430,517 in HOME program funding. The City anticipates allocating \$301,871 towards the City's internal First Time Homebuyer Program, which provides direct purchase assistance to eligible first-time homebuyers. The City anticipates allocating \$88,397 (the required 15 percent of the total allocation) towards eligible HOME program activities administered by a City approved Community Housing Development Organization (CHDO). Eligible HOME activities include acquisition for rehabilitation/resale/rental, new construction for resale/rent, and purchase assistance. The remaining \$40,249.50 HOME allocation will be used toward Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the

HOME program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,007,279	0	0	1,007,279	1,007,279	The annual allocation and any program income or prior year resources will be allocated to eligible CDBG Program categories per 24 CFR 570.200-570.207
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	430,517	0	60,374	490,891	490,891	The annual allocation and any program income or prior year resources will be allocated to eligible HOME program categories per 24 CFR92

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	0	
<u>CDBG-CV</u>	<u>public - federal</u>	<u>Acquisition</u> <u>Admin and Planning</u> <u>Economic Development</u> <u>Housing</u> <u>Public Improvements</u> <u>Public Services</u>	<u>613,463</u>	<u>0</u>	<u>0</u>	<u>613,463</u>		<u>An additional \$613,463 in CDBG-CV funding was authorized by the CARES ACT to respond to the growing effects of this historic public health Crisis.</u>

Table 5 - Expected Resources – Priority Table

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

The City of Pompano Beach does not currently have any plans to leverage additional resources to any of the goals and objectives identified in this Strategic Plan. In the event that a project arises that is eligible to leverage with federal funds, the City will hold a formal advertisement process and public meeting to inform the public of the Consolidated Plan update. Matching requirements are satisfied by use of State SHIP affordable housing funds.

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

The City of Pompano Beach and the City of Pompano Beach Community Redevelopment Agency (CRA) own parcels of land that can be used for affordable housing if and when necessary as leverage to affordable housing projects. Under the surplus land the city created a new program for Affordable housing. The lots are use to rebuilt new single family to qualify first time homebuyers.

Discussion

Through the Affordable Housing Trust Fund program the construction, purchase, redevelopment and sale of affordable homes and residential and rental properties the City can transform vacant and/or abandoned land or properties into owner occupied homes and rental properties that add to the tax base of the City and contribute positively to our community and help to stabilize neighborhoods. We will continue using the HOME funds to leverage through our purchase assistance program.

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	Homeowner Housing Rehabilitation	2015	2020	Affordable Housing	CITY OF POMPANO BEACH	Housing Rehabilitation	CDBG: \$554,731	Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	Administration	2015	2016	Administration	CITY OF POMPANO BEACH	Administration	CDBG: \$201,455 <u>CDBG-CV:</u> <u>\$122,692</u> HOME: \$40,250	Other: 1 Other
3	Public Services	2015	2020	Public Services	CITY OF POMPANO BEACH	Public Services	CDBG: \$151,091 <u>CDBG-CV:</u> <u>\$490,771</u>	Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted <u>Homelessness Prevention: 110 Persons Assisted</u>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Economic Development	2015	2020	Non-Housing Community Development	CITY OF POMPANO BEACH	Public Facilities Improvements	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
5	CHDO Activities	2015	2020	Affordable Housing	NW Redevelopment Area	Housing Rehabilitation	HOME: \$88,397	Homeowner Housing Added: 1 Household Housing Unit
6	Purchase Assistance	2015	2020	Affordable Housing	CITY OF POMPANO BEACH	Purchase Assistance	HOME: \$301,871	Direct Financial Assistance to Homebuyers: 10 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Housing Rehabilitation
	Goal Description	This project will provide home repair assistance to low and moderate income homeowners who are experiencing conditions in and around the home that pose a threat to the health, safety, and welfare of the household occupants. The activity is eligible under 24 CFR 570.202(a), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(3) – Housing Activities
2	Goal Name	Administration
	Goal Description	This activity will provide general management, oversight, and coordination of the program. This activity is assumed to benefit low- and moderate-income persons and are eligible under 24 CFR 570.206(a).

3	Goal Name	Public Services
	Goal Description	The City will collaborate with internal and external parties to provide eligible community services activities. These activities are eligible under 24 CFR 570.201(E), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(2) – Limited Clientele Activities or Area Benefit Activities.
4	Goal Name	Economic Development
	Goal Description	Repayment of the Section 108 Project - Old Pompano Project
5	Goal Name	CHDO Activities
	Goal Description	Funding will be allocated to certified CHDO's for the rehabilitation or development of housing for low income households. This activity is eligible under 24 CFR 92.300.
6	Goal Name	Purchase Assistance
	Goal Description	This activity will provide direct assistance to low-income households to cover some of the costs of homeownership (such as down payment, closing costs, or carrying costs), and/or address rehabilitation issues of housing units. This activity is activity is eligible under 24 CFR 92.205.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City anticipates receiving a total of \$1,585,080.60 in FY 2019 funding (October 1, 2019 – September 30, 2020) as follows: CDBG - \$1,007,279 and HOME \$ 430,517.

A special CDBG allocation in the amount of \$613,463 was authorized by the Coronavirus Aide, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis. These CDBG-CV funds will be used to increase the funding to the City's current public service activities. Specifically, the City of Pompano Beach anticipates allocating \$340,771 towards Emergency Rental Assistance and \$100,000 towards Mortgage Assistance for Habitat for Humanity homeowners, an additional \$50,000 towards the City's Senior Meals on Wheels Program, and the remaining \$122,692 will be applied to Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG-CV (CARES Act) allocation.

During the 2019-2020 fiscal year, the City of Pompano Beach will receive \$430,517 in HOME program funding. The City anticipates allocating \$301,871 towards the City's internal First Time Homebuyer Program, which provides direct purchase assistance to eligible first-time homebuyers. The City anticipates allocating \$88,397 (the required 15 percent of the total allocation) towards eligible HOME program activities administered by a City approved Community Housing Development Organization (CHDO). Eligible HOME activities include acquisition for rehabilitation/resale/rental, new construction for resale/rent, and purchase assistance. The remaining \$40,249.50 HOME allocation will be used toward Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the HOME program.

The required public review period begins Friday, June 26, 2019 and ends Monday, July 30th, 2019. The City of Pompano Beach will receive written comments until 8:00 AM on Thursday, August 1, 2019 on the proposed Action and budget as follows:

Projects

#	Project Name
1	CDBG Administration
2	HOUSING PROJECTS

#	Project Name
3	PUBLIC SERVICES ACTIVITIES
4	Economic Development - Section 108 Repayment
5	HOME ADMINISTRATION
6	2019 CHDO - OASIS OF HOPES
7	2019 FTHB PROGRAM
8	CHDO Reserve

Table 7 - Project Information

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

Priorities for allocation of funding have been established through a combination of public feedback, needs analysis, internal and stakeholder feedback and opportunities for leveraging. The largest obstacles for addressing the needs of the underserved is lack of private investments in underserved areas and rising cost of real estate. Program income received and introduced during the 2019/2020 fiscal year will be proportionately allocated to the projects/strategies contained in the 2019 Action Plan consistent with the City's Citizen Participation Plan.

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Administration
	Target Area	CITY OF POMPANO BEACH NW Redevelopment Area
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$201,455.80 CDBG-CV: \$122,692
	Description	This activity will provide general management, oversight, and coordination of the program. This activity is assumed to benefit low- and moderate-income persons and are eligible under 24 CFR 570.206(a).
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Citywide
	Location Description	100 W. Atlantic Blvd, Pompano Beach FL 33060
	Planned Activities	Planning and Administration (20%) \$201,455.80 This activity will provide general management, oversight, and coordination of the program. This activity is assumed to benefit low- and moderate-income persons and are eligible under 24 CFR 570.206(a). <u>An additional \$122,692 (20%) in CDBG-CV funding will be applied to Administration activities for staff time, technical assistance, and other eligible internal activities needed to successfully administer the CDBG-CV (CARES Act) allocation.</u>
2	Project Name	HOUSING PROJECTS
	Target Area	CITY OF POMPANO BEACH
	Goals Supported	Homeowner Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$554,732

	Description	This project will provide home repair assistance to low and moderate income homeowners who are experiencing conditions in and around the home that pose a threat to the health, safety, and welfare of the household occupants. The activity is eligible under 24 CFR 570.202(a), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(3) Housing Activities.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	20 units or more throughout the city
	Location Description	Citywide
	Planned Activities	<u>Housing Rehabilitation Program (Citywide) \$554,731.35</u> This project will provide home repair assistance to low and moderate income homeowners who are experiencing conditions in and around the home that pose a threat to the health, safety, and welfare of the household occupants. The activity is eligible under 24 CFR 570.202(a), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(3) – Housing Activities.
3	Project Name	PUBLIC SERVICES ACTIVITIES
	Target Area	CITY OF POMPANO BEACH NW Redevelopment Area
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$151,091 CDBG-CV: \$490,771
	Description	The City will collaborate with internal and external parties to provide eligible community services activities. These activities are eligible under 24 CFR 570.201(E), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(2) Limited Clientele Activities or Area Benefit Activities \$
	Target Date	9/30/2020

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>Approximately 350 clients will be served during this program year.</p> <p><u>The City anticipates assisting approximately 85 clients with Emergency Rental assistance through the CDBG-CV CARES ACT allocation. This activity will help prevent eviction resulting in homelessness and will enable LMI households to remain in their rental unit.</u></p> <p><u>In addition, the City anticipates assisting approximately 25 low to moderate income Habitat for Humanity homeowners that have experienced hardship due to COVID-19 with Emergency Mortgage assistance through the CDBG-CV CARES ACT allocation. This activity will help prevent foreclosure resulting in homelessness and will enable LMI households to remain in their home.</u></p> <p><u>Finally, the City will be assisting approximately 100 additional seniors through the City's "Meals on Wheels" program.</u></p>												
<p>Location Description</p>	<p>Citywide</p>												
<p>Planned Activities</p>	<p>The City will collaborate with internal and external parties to provide eligible community services activities. These activities are eligible under 24 CFR 570.201(E), and will benefit low- and moderate-income persons as qualified under 24 CFR 570.208(a)(2) – Limited Clientele Activities or Area Benefit Activities.</p> <p><u>CDBG-CV funds will be used to increase the funding to the City's current public service activities. Specifically, the City of Pompano Beach anticipates allocating \$340,771 towards Emergency Rental Assistance,</u></p> <p><u>an additional \$50,000 towards the City's Senior Meals on Wheels Program.</u></p>												
<p>4</p>	<table border="1"> <tr> <td data-bbox="235 1541 548 1596"> <p>Project Name</p> </td> <td data-bbox="548 1541 1432 1596"> <p>Economic Development - Section 108 Repayment</p> </td> </tr> <tr> <td data-bbox="235 1596 548 1650"> <p>Target Area</p> </td> <td data-bbox="548 1596 1432 1650"> <p>CITY OF POMPANO BEACH</p> </td> </tr> <tr> <td data-bbox="235 1650 548 1705"> <p>Goals Supported</p> </td> <td data-bbox="548 1650 1432 1705"> <p>Economic Development</p> </td> </tr> <tr> <td data-bbox="235 1705 548 1759"> <p>Needs Addressed</p> </td> <td data-bbox="548 1705 1432 1759"> <p>Economic Development</p> </td> </tr> <tr> <td data-bbox="235 1759 548 1814"> <p>Funding</p> </td> <td data-bbox="548 1759 1432 1814"> <p>CDBG: \$100,000</p> </td> </tr> <tr> <td data-bbox="235 1814 548 1875"> <p>Description</p> </td> <td data-bbox="548 1814 1432 1875"> <p>Repayment of the section 108 loan for Old Pompano Beach Project.</p> </td> </tr> </table>	<p>Project Name</p>	<p>Economic Development - Section 108 Repayment</p>	<p>Target Area</p>	<p>CITY OF POMPANO BEACH</p>	<p>Goals Supported</p>	<p>Economic Development</p>	<p>Needs Addressed</p>	<p>Economic Development</p>	<p>Funding</p>	<p>CDBG: \$100,000</p>	<p>Description</p>	<p>Repayment of the section 108 loan for Old Pompano Beach Project.</p>
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	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Aprox. 2500
	Location Description	Repayment of the loan - 100 W. Atlantic Blvd, Pompano Beach FL 33060
	Planned Activities	
5	Project Name	HOME ADMINISTRATION
	Target Area	CITY OF POMPANO BEACH NW Redevelopment Area
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	HOME: \$40,250
	Description	This activity will provide general management, oversight, and coordination of the HOME program including planning and monitoring costs. This activity is eligible under 24 CFR 92.207
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Citywide
	Location Description	100 W. Atlantic Blvd, Pompano Beach FL 33060
	Planned Activities	HOME Program Administration (10%) \$40,249.50 This activity will provide general management, oversight, and coordination of the HOME program including planning and monitoring costs. This activity is eligible under 24 CFR 92.207.
6	Project Name	2019 CHDO - OASIS OF HOPES
	Target Area	NW Redevelopment Area
	Goals Supported	CHDO Activities
	Needs Addressed	Purchase Assistance
	Funding	HOME: \$88,397

	Description	Funding will be allocated to certified CHDO's for the rehabilitation or development of housing for low income households. This activity is eligible under 24 CFR 92.300.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One person will be assisted through this funding
	Location Description	NW District Pompano Beach
	Planned Activities	New construction and resell of the property to a first time buyer client.
7	Project Name	2019 FTHB PROGRAM
	Target Area	CITY OF POMPANO BEACH NW Redevelopment Area
	Goals Supported	Purchase Assistance
	Needs Addressed	Purchase Assistance
	Funding	HOME: \$301,871
	Description	This activity will provide direct assistance to low-income households to cover some of the costs of homeownership (such as down payment, closing costs, or carrying costs), and/or address rehabilitation issues of housing units. This activity is activity is eligible under 24 CFR 92.205.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	At least 10 to 15 people will be assisted through this year.
	Location Description	Citywide activity
	Planned Activities	This activity will provide direct assistance to low-income households to cover some of the costs of homeownership (such as down payment, closing costs, or carrying costs), and/or address rehabilitation issues of housing units. This activity is activity is eligible under 24 CFR 92.205.
8	Project Name	CHDO Reserve
	Target Area	NW Redevelopment Area
	Goals Supported	CHDO Activities

Needs Addressed	Purchase Assistance
Funding	HOME: \$60,373
Description	CHDO Reserve funding, the city will be doing another RFP to get another qualified CHDO assistance through this funding.
Target Date	9/30/2020
Estimate the number and type of families that will benefit from the proposed activities	One to two units
Location Description	Northwest Area
Planned Activities	Acquisition / Rehab and resell chdo set a side funding

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

All CDBG and HOME goals, objectives and projects described in this Annual Action Plan will be allocated citywide based on level of need and income levels of beneficiaries selected to receive eligible services. Any funds being allocated to projects and activities in the NW Redevelopment Area will be determined on an as-needed basis dependent upon the type of project and level of need.

Geographic Distribution

Target Area	Percentage of Funds
CITY OF POMPANO BEACH	100
NW Redevelopment Area	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The result allows the entire jurisdiction to receive funds based primarily upon client need.

Discussion

Funding for housing and community development programs will generally be utilized City wide and/or in the eligible Census Tracts and Block Groups to allow for maximum flexibility and to take advantage of potential leveraging opportunities.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The following tables describe the anticipated outcomes to be accomplished by implementing CDBG and HOME program funding toward eligible grant categories for projects that will increase affordable housing opportunities.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	40
Special-Needs	0
Total	40

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	0
Rehab of Existing Units	22
Acquisition of Existing Units	8
Total	40

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

Discussion

Homeless needs and special needs populations are being addressed through a combination of CoC activity and leveraging with HOME TBRA and State SHIP funds. We are adding TBRA as a new strategy for addressing homeless needs and special needs populations in Pompano Beach. In addition, the City has created a new Homeless Coordinator position within the City Manager Office. The intent is to focus City resources on city-specific needs and enhance the delivery of homeless services in areas that have been identified as gaps or opportunities for more robust activity. All activities will be designed to increase shelter exits to permanent housing in furtherance of the Housing First approach.

Though the City's Public Service Activities, The City of Pompano Beach anticipates assisting approximately 110 low-to-moderate income families with emergency rental/mortgage assistance with the additional CDBG-CV funding.

AP-60 Public Housing – 91.220(h)

Introduction

In this section of the Annual Action Plan, we describe the actions that will be undertaken by the Pompano Beach Housing Authority to continue and expand efforts in providing affordable housing and other supportive housing services to public housing residents and Section 8 Housing Choice Voucher recipients in Pompano Beach during the 2019-2020 fiscal year.

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

The Pompano Beach Housing Authority intends to continue the day-to-day management and operation of 476 public housing units and 918 Section 8 Housing Choice Vouchers in an effort to assist low-income persons and families secure and maintain a safe and healthy living environment. The Housing Authority anticipates constructing 10 new public housing units on NW 10th Street in Pompano Beach over the next five-year Consolidated Plan period.

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

The Pompano Beach Housing Authority (PBHA) administers the Family Self-Sufficiency program to increase resident involvement and promote self-sufficiency and less dependence on public housing assistance. Family Self-Sufficiency (FSS) is a HUD program that encourages the Housing Authority to work with agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to increase their earned income and establish an escrow account. Section 8 rental assistance program recipients, who receive assistance through the PBHA, are eligible to participate in the FSS program. Families enter into a contract with the PBHA that specifies goals and services that each family must fulfill in order to obtain full benefits from the program. At the end of the five-year contract period, the goal is for each family to no longer need housing assistance. If a family completes the FSS program and still needs housing assistance, the family is still eligible to continue receiving Section 8 rental assistance under the voucher program.

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

provided or other assistance

The Pompano Beach Housing Authority is not designated as troubled by HUD. The Housing Authority is eligible to receive annual funding allocations for the operation and maintenance of existing public housing units, and other eligible activities determined by HUD.

Discussion

N/A

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

Introduction

In this section of the Annual Action Plan, we describe any efforts that the City of Pompano Beach, in partnership with homeless services provider agencies in the City and surrounding Broward County area, will undertake to address the homeless and other special needs populations.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

Broward County's comprehensive and collaborative strategy to address homelessness features robust outreach. Due to community demand, street outreach has taken on both screening and engagement services. The Broward Outreach Center and the 2-1-1 Homeless Helpline are the main providers of outreach services in Pompano Beach.

The Broward Outreach Center, operated by Miami Rescue Mission, is a state-of-the-art, 200-bed, homeless assistance center located in Pompano Beach. It is in its second year of serving homeless men, women and families. The program is designed to be an eight-week, full-service homeless shelter, with an average stay of sixty days.

The 2-1-1 Homeless Helpline is the gateway to homeless services in Broward County, the first step in finding shelter, support services, or programs that help an individual or family who are homeless or on the verge of being homeless. The 2-1-1 team is responsible for managing the waiting list for families in need of shelter and for prioritizing placements based on critical factors such as health, safety and ages of children. The team works closely with homeless shelters to track the availability of family beds and to quickly place families at highest risk into those beds. The team also maintains regular contact with families on the waiting list to assess whether their needs or situations have changed.

Addressing the emergency shelter and transitional housing needs of homeless persons

While new resources have come on-line to address emergency and transitional housing needs, Broward County has committed to a rapid-re-housing/housing first approach to homelessness. This strategy

includes re-tooling assessments done at shelters to focus on housing barriers.

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 development of more permanent housing, with or without subsidies, is a key factor in ending homelessness - affordable housing must be our major focus. Ideally, all people would have access to affordable housing and permanent housing vouchers, furthering the cause of ending homelessness. It is especially important to target affordable housing resources to households experiencing homelessness, particularly the most vulnerable ones. In addition to the importance of long-term housing subsidies and development of affordable housing, a great deal has been learned about the effectiveness of short to medium term subsidies paired with private housing units. This approach examines reallocating funding from a variety of sources including TANF, ESG, CoC and child welfare funding towards rental subsidies.

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 homeless assistance system needs good relationships with health care providers, the corrections system, foster care and other institutions that interact with low income and homeless individuals and families. The new HEARTH Act regulations and current budget environment make collaboration more important than ever. Additionally, the Affordable Care Act, an engaged Broward Sheriff's Office and the money being invested in ending veteran's homelessness support the case for establishing these relationships. Effective collaboration requires selling agencies on why they should work closely with the homeless assistance system; inviting stakeholders in other agencies to engage with homeless providers through joint planning and CoC meetings; and using data to identify people that access multiple systems to be targeted for assistance. Strategies include: expediting benefits enrollment and data analysis of

consumers that are high utilizers of hospitals and jails.

Discussion

N/A

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

Introduction:

As a recipient of Community Development Block Grant (CDBG) entitlement funding from the US Department of Housing and Urban Development (HUD), the City of Pompano Beach is required to create and maintain 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 AI identified five (5) perceived impediments to affordable housing and fair housing choice. The barriers identified, are described as follows:

- Violations of federal and local fair housing laws in the City of Pompano Beach
- Awareness of fair housing laws, issues, potential violations and resources appears to be limited
- Continued disparity by race in mortgage origination and access to non-predatory loans
- Continued concentration of racial minorities in low-opportunity communities
- Lack of adequate capital resources to address affordable housing gap

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

As of a part of the development of the AI, the City of Pompano Beach determined recommendations for actions that can be implemented in federal grant program administration and other local government operations to resolve the identified barriers. The recommended actions to resolve the barriers identified, are described as follows:

The City of Pompano Beach should continue to enforce local, state and federal fair housing laws by reporting violations and allegations of violations to the appropriate government agency

- The City of Pompano Beach should continue to provide information on fair housing laws to the public, its staff, Realtors, property owners and lenders through educational activities including workshops, public service announcements and presentations to targeted groups
- The City of Pompano Beach should continue to provide educational fair housing and fair lending materials to local lenders and support homebuyer workshops that provide education to homebuyers
- The City should continue to promote efforts to desegregate communities through educational efforts to expand opportunities in all communities throughout the City
- Continue to work with all development stakeholders in the City and region to promote affordable housing development. The City should strategically utilize local resources, including

the CRA, housing trust funds and the potential Broward County Linkage Fee to address gaps in affordable housing development projects

Discussion:

N/A

AP-85 Other Actions – 91.220(k)

Introduction:

In this section of the Annual Action Plan, we describe the additional actions, if necessary, which will be implemented into CDBG and HOME program, funded activities and projects completed during the 2019-2020 fiscal year.

Actions planned to address obstacles to meeting underserved needs

No additional actions planned to address obstacles to meeting underserved needs. In the event that an underserved need is identified, and CDBG and/or HOME funds become available, the OHUI will meet with the appropriate advisory board to request funding approval for special projects during the 2019-2020 fiscal year.

Actions planned to foster and maintain affordable housing

The City of Pompano Beach anticipates to continue fostering and maintaining affordable housing efforts citywide through providing HUD program funding towards activities such as homeowner rehabilitation, purchase assistance through the First-Time Homebuyer Program and providing direct funding to approved Community Housing Development Organizations (CHDOs) to implement affordable housing activities to low- and moderate-income beneficiaries.

Moreover, the Office of Housing and Urban Improvement is taking a more active role in overall City redevelopment projects through administrative oversight of Section 108 Loan funds that are being used for infrastructure improvements in the area known as "Old Pompano". OHUI is also partnering more closely with the City's CRA in order to more effectively leverage Federal, State, County and City funds to increase the stock of affordable housing to low- and moderate-income households throughout the City, with an increased emphasis on workforce housing. The City understands that attractive, affordable housing built using innovative designs and materials is critical to help advance the City's overall Economic Development plans.

Actions planned to reduce lead-based paint hazards

The City of Pompano Beach Office of Housing and Urban Improvement (OHUI) requires all contractors to submit the following documents or complete the necessary steps prior to beginning any construction activities on homes being rehabilitated with federal funding:

- Lead Based Paint (LBP) inspection and risk assessment
- Notice to occupants of results
- Visual assessment
- Paint Stabilization
- Provisions of LBP Pamphlet
- Abatement of LBP
- Interim Controls
- Safe work practices in rehabilitation

It is a best practice of the OHUI to encourage the avoidance of purchasing new affordable housing units that are pre-1978 under programs such as the Neighborhood Stabilization Program (NSP), or with recaptured program funds.

Actions planned to reduce the number of poverty-level families

The City of Pompano Beach's anti-poverty goals and programs are aimed to foster economic growth and job creation for the City's residents, with a focus on very low-income households. These empowerment programs will include educational opportunities for low-income households and match employment openings with the local workforce

The projected outcomes of these strategies will be:

- Create new jobs targeted at the currently unemployed, by providing small business training and development programs, and construction training.
- Award college scholarships to high performing low-income high school seniors through the Blanche Ely Scholarship Program.
- Assist small business development through commercial rehabilitation, micro-loans, technical assistance and business training.

The City works to provide information and referrals to the many service providers and organizations in Broward County. The affordable housing, public services and economic development goals and

objectives identified in this strategic plan of the Consolidated Plan target all low to moderate income areas and persons in order to create or sustain affordable housing, provide supportive services necessary to create decent living environments, and create economic opportunities throughout the City; all of which are measures of reducing poverty and creating empowerment for the residents of Pompano Beach.

Actions planned to develop institutional structure

No additional actions are planned to develop institutional structure. In the event that a weakness or insufficiency is identified in the current institutional delivery system, the OHUI will work with the appropriate City Department or non-profit organization partner to strengthen any gaps or weaknesses.

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

As discussed in AP 55, the City plans to restructure the OHUI to include a Homeless Coordinator and staff to further city-specific needs in support of the CoC's Housing First program. This is a substantial undertaking; there are no specific additional actions planned to enhance coordination between public and private housing and social service agencies. The OHUI will continue to work with HUD and local non-profit service providers to strengthen coordination between public and private housing and social services agencies to ensure all HUD program funded goals and objectives are achieved.

Discussion:

N/A

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.	100.00%

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:
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:

The City will use HOME funds to assist low income families through second mortgage financing for closing cost, down-payment assistance, land purchases and development, as well as, provide first mortgage financing of greater than 50% of the sale price as the prime lender to a low income family. The City's Recapture provisions are design to recapture the HOME funds as follows:

1. FIRST MORTGAGE FINANCING: Designed to recapture HOME funds at 100% through either amortization of loan over time, sale of the property, refinancing, or transfer of property, regardless of the amount of time the property is held. The controlling instrument is a mortgage deed held in first position. HOME funds will be utilized as first mortgage financing of a house for a low income resident ONLY in a last resort housing situation.

2. SECOND MORTGAGE FINANCING- During the first 15 years after purchase, if the property is sold, rented, refinanced, the buyer will be required to pay 100% of the assistance provided. During the last five years the assistance will be reduced 20% per year and a satisfaction of mortgage given after the 20th year as follows.

The Affordability Period is based upon the total amount of assistance as set forth in the HOME Program Regulations (24 CFR 92.254). Only direct subsidy to the homebuyer is subject to recapture. The City's HOME Recapture provisions limit the amount to be recaptured to the net proceeds of the sale. If a buyer sells, refinances, transfers, or does not occupy the property as their primary residence, the City will recapture its HOME investment funds.

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:
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:

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

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

N/A

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

N/A

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).

N/A

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.

N/A

5. Describe performance standards for evaluating ESG.

N/A

n/a