

Howard County

HOUSING

Howard County, Maryland
FFY2015 Action Plan

Growth and Community Outreach



Prepared By:

Howard County Department of Housing and Community Development

May 15, 2015

Thomas P. Carbo, Director
Shirelle M. Bennett, Deputy Director

6751 Columbia Gateway Drive Columbia, MD 21046

Howard County DUNS # 102547127

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Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

04/20/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Howard County, Maryland

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

52-6000965

*** c. Organizational DUNS:**

1025471270000

d. Address:

*** Street1:**

6751 Columbia Gateway Drive

Street2:

3rd Floor

*** City:**

Columbia

County/Parish:

Howard

*** State:**

MD: Maryland

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

21046

e. Organizational Unit:

Department Name:

Housing and Comm. Development

Division Name:

Comm. Planning and Grants Mngt

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

*** First Name:**

Thomas

Middle Name:

P.

*** Last Name:**

Carbo

Suffix:

Title:

Director

Organizational Affiliation:

Howard County Dept. of Housing and Community Development

*** Telephone Number:**

410-313-6348

Fax Number:

410-313-5960

*** Email:**

tcarbo@howardcountymd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:
[Empty field]

Type of Applicant 3: Select Applicant Type:
[Empty field]

* Other (specify):
[Empty field]

*** 10. Name of Federal Agency:**

U.S Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:
HOME Investment Partnership Grant (HOME)

*** 12. Funding Opportunity Number:**

[Empty field]

* Title:
[Empty field]

13. Competition Identification Number:

[Empty field]

Title:
[Empty field]

14. Areas Affected by Project (Cities, Counties, States, etc.):

Howard County, Maryland Add Attachment Delete Attachment View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Howard County will carry out HOME eligible activities that maintain and expand the supply of affordable housing through acquisition, new construction, rehabilitation, and homeownership assistance.

Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

3,7,9,12,13

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

07/01/2015

* b. End Date:

06/30/2016

18. Estimated Funding (\$):

* a. Federal

310,681.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

310,681.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes

No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

Prefix:

Mr.

* First Name:

Allan

Middle Name:

H

* Last Name:

Kittleman

Suffix:

* Title:

County Executive

* Telephone Number:

410-313-2013

Fax Number:

* Email:

AKittleman@howardcountymd.gov

* Signature of Authorized Representative:



* Date Signed:

5/11/2015

Application for Federal Assistance SF-424

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 Application
 Changed/Corrected Application

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 Revision

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*** Other (Specify):**

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Housing and Comm. Development

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B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:
Community Development Block Grant (CDBG)

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Howard County, Maryland Add Attachment Delete Attachment View Attachment

*** 15. Descriptive Title of Applicant's Project:**

See Attachment A.

Attach supporting documents as specified in agency instructions.

Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,005,824.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="11,858.13"/>
* g. TOTAL	<input type="text" value="1,017,682.13"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

Attachment A.

15) The Howard County Department of Housing and Community Development will carry out a broad range of eligible CDBG activities directed towards revitalizing neighborhoods, creating sustainable communities and improving facilities and access to services. All entitlement funds will be utilized for activities that meet one or more of the National Objectives established by HUD.

Executive Summary

The Federal Fiscal Year (FFY) 2015 Action Plan is the fifth and final Action Plan under the current FFY2011 – FFY2015 Consolidated Plan (Con Plan). The Con Plan is a five-year strategic plan mandated by the U.S. Department of Housing and Urban Development (HUD) which, upon its submission and approval, enables the County to receive funding for the Community Development Block Grant program (CDBG) and the HOME Investment Partnership grant (HOME). The document identifies the major housing and community development needs of the County and sets specific goals and objectives to meet these needs. Howard County adopted the current Consolidated Plan in June of 2012.

The Annual Action Plan, which describes the specific actions the County will take during the program year to implement the goals and objectives outlined in the Consolidated Plan, is adopted by the County each Year. HUD prescribes the form and content of the Annual Action Plan.

A. Evaluation of Past Performance

During the previous year, HCH continued to concentrate its efforts on addressing the need for expanding affordable housing opportunities for low- and moderate-income households. As referenced in the FFY2011-FFY2015 Consolidated Plan, HCH developed an Affordable Housing Strategic Plan which identified specific strategies utilized in FFY13, which are now bridging the County's acute affordability gap. The following is a list of accomplishment highlights for Program Year 2014:

- Generated plans for the future development of Jones Road/Greenwood Village - as single family affordable homeownership units. This project will move forward in FFY15 and create 36-30 new units with 6 units designated to remain affordable.
- Howard County is continuing the Relocation Assistance Program for Beechcrest mobile home park residents. Residents were notified of the planned park closure and the final phase of the closure process will be completed by June 30, 2015.

	Phase I	Phase II	Phase III	Phase IV
Closure Date	December 31, 2013	June 30, 2014	December 31, 2014	June 30, 2015
Affected Addresses	27-31 Ruth Avenue 34-39 Alma Avenue	21-26 Ruth Avenue 41-43 Alma Avenue	2-18 Ruth Avenue	44-45 Alma Avenue 47-53 Alma Avenue

For the current year, nine (9) households have been assisted. There are eight (8) remaining households to relocate prior to the June 30, 2015 closure date.

Other HCH accomplishments:

The demand for assistance across all types of services within the human and social service sector has continued to increase during the past year. In FFY14, Howard County Housing continued to support local non-profits by funding public service activities specifically aligned with projects and programs viewed as core components of the County’s Continuum of Care (CoC) and that directly support the County’s Plan to End Homelessness. (PEH)

Howard County awarded FFY12 and FFY13 HOME CHDO set-aside funds to iHomes, Inc. to support the acquisition of a single-family townhouse unit in Elkridge, MD. The unit will be used as permanent supportive housing for two (2) psychiatrically disabled adults who are in need of long-term affordable housing and supportive services. iHomes, is the project sponsor/developer and will transfer ownership of the unit to another Howard County non-profit, Way Station, who will manage the property and provide in-home services for the residents.

Other County accomplishments:

The Howard County Department of Citizen Services (DCS) is the Lead Agency for the Howard County Continuum of Care (CoC) which is responsible for coordinating activities to address the needs of the homeless and those at-risk of becoming homeless. Through the Plan to End Homelessness (PEH), and as a requirement of the HEARTH Act, the Coordinated System of Homeless Services (CSHS) was developed, as the County’s coordinated assessment system.

CSHS is a six-stage system designed to efficiently use community resources to reduce the number of homeless families and individuals, reduce the number of newly homeless, shorten the length of homeless episodes, and reduce the number of returns to homelessness. By using a single point of entry (SPE), all households seeking homeless services receive a uniform assessment for immediate intervention with the goal of diversion from homelessness. Households not diverted and needing further intervention are referred to the CSHS intensive supports, provided by multiple community agencies, to further their housing stability and assist them in accessing community resources. The SPE and initial assessments seek to remove the obstacle of homeless households navigating through multiple agencies and their eligibility processes, and allows for service referrals at a community-wide level to the resource most suitable to their needs. Such resources include: eviction prevention services, rehousing services with housing location assistance, employment supports, a landlord guarantee program to incentivize landlords to remove household's housing barriers, supportive services and permanent housing for persons with mental health disabilities, the chronically homeless, and those with disabilities. Additional resources include, but are not limited to, addictions treatment and a local subsidy program, incorporating case management services that promote housing stability.

CSHS maintains a follow-up process to ensure its structure and resources are providing successful housing stability for the homeless community of Howard County. Through data collection and analysis, the CSHS monitors its efficiency of service coordination and its progress of system goals. As the Lead Agency for the CoC, the Department of Citizen Services as outlined in HUD's Interim Rule and HEARTH Act, oversees the ongoing operations and flow of the CSHS and the Plan to End Homelessness. The primary focus of the Plan to End Homelessness is to ensure that those experiencing homelessness obtain and maintain permanent housing. Through the Plan, a variety of resources have been provided including, addictions treatment, a Landlord Guarantee Program, a Housing Locator, Flexible Financial Assistance, and a local subsidy program.

The Howard County Housing Commission served 34 persons in 22 households as a result of HOPWA funding from July 1, 2014 - June 30, 2015. All housing assistance was provided in the form of tenant-based rental assistance. Total HOPWA funding in the amount of \$228,337.00 was awarded by the City of Baltimore, with \$212,354.00 designated for rental assistance, and \$13,770.00 for program administration. The participating households were selected by way of application through

the Howard County Health Department. The selection criterion is strictly based on date and time of receipt of application. HOPWA Program is administered in coordination with other Housing Services in the county, including the Housing Choice Voucher Program, Mainstream Housing Program, McKinney Program, Public Housing Program and the Rental Allowance Program (RAP).

Howard County is one of only three jurisdictions in the state that provides protection for voucher holders under the Fair Housing Law. This insures that HOPWA families are provided with equal access to housing in the county without regard to their status as voucher holders. Howard County has experienced a 100 percent success rate for HOPWA voucher holders locating units in Howard County over the past five years.

The goal of the Commission in conjunction with the Department of Health has been first and foremost to provide an affordable and stable living environment for participating households. The secondary goal has been to provide referrals to households to provide stability to their home environment, thus enabling them to remain productive members of society for as long as they are physically able to remain employed. Just as important as the goals previously mentioned, we are committed to providing information and referrals to households so that they may obtain the appropriate medical care and services to insure that they remain healthy for longer periods of time.

Of the 22 households served, a total of 8 have been able to maintain employment. In addition, four of the participating families have been able to maintain household incomes between 30 and 50 percent of area median, and three of the participating families have been able to maintain household incomes between 50 and 80 percent of area median. One family was removed from the program because household income exceeded the program limits. The increased earning potential of the households has clearly been due in part to the success of the Commission in meeting its goal of a more stable living environment. In addition, a more stable living environment has contributed to the success of several households in meeting medical appointments, taking medications on prescribed schedules, and attending self-help sessions.

The Howard County Housing Commission did not experience any significant barriers in the past year. Poor credit continues to be an issue for some families in locating owners who are willing to lease to HOPWA families. However, there have been no families who have been unable to locate suitable housing over the past several years due to credit issues. While poor credit does not affect a

family's ability to locate housing, it does restrict the family's ability to locate housing in some of the more desirable neighborhoods. There are no technical assistance needs to be reported at this time.

The Howard County Department of Housing and Community Development served 27 persons in 10 households as a result of Rental Assistance Program (RAP) funding from July 1, 2014 - June 30, 2015. All housing assistance was provided in the form of tenant-based rental assistance. Assistance in the amount of \$35,000 was provided by the state for leasing during the current fiscal year, and \$5,000 was provided for program administration.

The goal of the Department has been to first provide stability for households in an unstable living environment that are at risk for eviction and/or homelessness. The secondary goal has been to identify families who have the resources and the financial potential to increase household income within a one year period to a level that would allow for self-sufficiency once the RAP subsidy terminates. The Department has also been committed to providing information and referrals to households to facilitate the transition.

Howard County Housing experiences significant barriers in identifying families that can benefit from use of the RAP subsidy. The high rents that are characteristic of Howard County make it difficult for families to qualify for units at the subsidy levels set by the state. The families that could most benefit from the subsidy most often have incomes that exceed the eligibility income limits for the Program. The Department anticipates a transition of administration for the program to the Community Action Council during the next fiscal year. The RAP program can be combined with other subsidy programs administered by that agency to allow for increased subsidies as well as an extended subsidy period.

Poor credit continues to be an issue for families in locating participating owners for the RAP Program, like most other subsidy programs administered by the Department.

B. Summary of Objectives and Outcomes

Below is a summary of the objectives and anticipated outcomes as outlined in the Consolidated Plan. These objectives and outcomes are derived from HUD's Outcome Performance Measurement System:

Affordable Housing – The *objective* is Providing Decent Affordable Housing and the anticipated *outcome* is Affordability and Availability/Accessibility.

Homelessness – The *objective* is Creating Suitable Living Environment. The *outcome* is Availability/Accessibility.

Special Needs – The *objective* is Providing Decent Affordable Housing. The *outcome* will be Affordability.

Planning and Administration – (Affirmatively Furthering Fair Housing and Program Coordination) – Planning and administration does not require an objective and outcome.

Public Services Programs – The *objective* is Creating Suitable Living Environment and the anticipated *outcome* is Availability/Accessibility.

Special Economic Development – The *objective* is Creating Economic Opportunities and the expected *outcomes* are Availability/Accessibility and Affordability.

C. Summary of Citizen Participation Process

Howard County Housing manages the Citizen Participation process for the Annual Action Plan and any plan amendments by annually holding public meetings and public hearings. These forums provide Howard County’s non-profit providers, housing advocates, officials and the general public with an opportunity to learn about Howard County’s proposed CDBG and HOME funded activities during the coming Federal Fiscal Year and provides an opportunity for feedback on its proposed use of funds. Public meetings are held at the beginning of the Action Plan process and several public hearings are held prior to submitting the Action Plan to HUD. The public hearings and meetings are announced through Public Notices that are published in local newspapers and posted on the Howard County website, as well as in area nonprofit provider’s newsletters and websites. Draft copies of the Action Plan are also made available at all Howard County libraries. Howard County observes a similar process for the Consolidated Plan and the Consolidated Annual Performance and Evaluation Report (CAPER).

D. Summary of Consultation Process

HCH collaborates with a variety of human service providers, county departments and other public agencies for suggestions and coordination of County-wide strategies related to the Action Plan. The goals set forth in the Consolidated Plan are established through shared data with local providers, who collaborate on creating and planning needs assessment documents. Public officials, public and private nonprofit agencies serving special needs populations,

interagency collaborators, advocacy groups, advisory boards and other general consumers of services, participate in the consultation process. Due to the similarity in populations being served, HCH works very closely with a variety of agencies represented on the Board to Promote Self-Sufficiency (BPSS) to prevent duplication of effort and maximize the allocation and utilization of Local, State and Federal resources.

HCH works to promote the Continuum of Care (Coc), the Coordinated System of Homeless Services (CSHS) and the Plan to End Homelessness by directing Howard County residents who are homeless, or about to become homeless, to the designated Continuum of Care Single Point of Entry. In Howard County, Grassroots Crisis Intervention Center is that point of entry. HCH also acted as a Subrecipient and Program Administrator of the Supportive Housing Program (SHP) designed to provide permanent supportive housing and supportive services for homeless persons transitioning from homelessness. HCH has administered the SHP program for the last two (2) years, utilizing the case management services of Volunteers of America, Chesapeake (VOAC). The Subrecipient Agreement was terminated on April 17, 2015. HCH also administers the Housing Stability Subsidy Program (HSSP), a County-funded permanent supportive housing program.

Because of its many outstanding partnerships, HCH is critically aware of the housing and supportive service needs surrounding the community. Partnerships with such groups as, Grassroots Crisis Intervention Center, Humanim, Bridges to Housing Stability, and Volunteers of America Chesapeake, provide much needed case management and referral resources to those in need.

E. Summary of Efforts to Broaden Public Participation

The Howard County Citizen Participation Plan includes efforts to broaden public participation (e.g., accommodations for non-English speaking persons and vision and hearing impaired persons). HCH's web page is updated routinely to inform citizens about organizational activities including meetings, outreach events, educational opportunities, and the availability of services. The website provides information about programs, services and projects as well as FAQs. Frequently requested forms and pamphlets, such as the Howard County Owner/Landlord Handbook, the Rental Housing Survey, the Fair Housing Guides for Renter and Owner Occupied Homes, program annual and action plans; and contact information for other affordable rental communities and housing preservation services Are available on the HCH website. The included text is considered standard language on applicable Public Notices and other forms of literature.

Alternative formats of this Notice, such as Braille, print in languages other than English and large print can be made available upon request.

Finally, HCH's Division of Contracts Management and Technical Services Facilities requests with proper notice, for a sign language or other language interpreter.

Other efforts to inform the community about HCH activities and other relevant information include:

- Social Media: HCH has both Facebook (<https://www.facebook.com/HowardCountyHousing>) and Twitter (<https://twitter.com/HoCoHousing>) pages. With daily – sometimes hourly– monitoring, posts and tweets focus on housing opportunities (rental and homeownership), as well as housing industry and market trends, employment, education, transportation, as well as upcoming events.
- Webpage: HCH has both a Howard County Government web page (<http://www.co.ho.md.us/Departments.aspx?ID=2232>) and a stand-alone web page (<http://www.co.ho.md.us/Departments.aspx?ID=6442455366>).
 - In 2014, HCH hosted or participated in the following outreach events:
 - The annual Fair Housing Continuing Education Training for the Howard County Association of Realtors , sponsored by the Office of Human Rights. That training was held on February 4, 2015 and was the third such training held.
 - A free monthly Homebuyer Education Workshop, in accordance with the Fannie Mae Certificate Program held for first-time homebuyers and to re-familiarize former homeowners about the home buying process and the responsibilities of homeownership. The workshop is open to anyone interested in purchasing a home in Howard County. Those who complete the workshop may be eligible for the [Maryland Mortgage Program](#), which provides assistance with downpayment and settlement costs in the form of a deferred loan from the State of Maryland; and the County's [Moderate Income Housing Unit \(MIHU\) Homeownership Program](#).

- A free, quarterly Moderate Income Housing Unit (MIHU) Program workshops to educate the public about MIHU rental and homeownership opportunities. These workshops were held in the Howard County Housing Office on the following dates:

July 15, 2014

October 13, 2014

January 15, 2015

April 20, 2015

- In partnership with the Department of Inspections, Licensing & Permits, Office of Consumer Affairs and Office of Human Rights, co-facilitated the bi-annual Tenant Landlord Essentials class.
- An annual foreclosure prevention workshop is held in partnership with the Maryland Department of Housing and Community Development in October. HCH offers homeowners resources to avoid foreclosure and/or homelessness.
- The Health Connect Now Fair, held on March 15, 2014, was an opportunity to educate residents, especially those who are new to the U.S., about housing opportunities. This is an audience that while often willing to seek healthcare benefits and participate in the public school system, resists connecting with other service providers.
- The annual Money Matters Fair was held on April 5, 2014, is a community financial literacy event hosted by HCH, with seminars given by Consumer Credit Counseling Services of MD & DE on affordable housing opportunities, financial literacy and housing stability.
- Come Home to Howard County Housing Fair, and annual event held this year on April 12, 2014, featured 60 industry and service professionals, 29 educational sessions - including a first time homebuyer class taught in Spanish, healthy housing, and fair housing; a rental and homeownership housing lottery, prize drawings, free credit reports and consultations with Consumer Credit Counseling Service, childcare, entertainment, and bus tours to new home

communities in Ellicott City and Elkridge. The event attracted approximately 900 attendees.

- The Office of Workforce Development, Mid-Maryland Youth Council, Youth and Job Resource Fair on April 24, 2014, exposed Howard County youth and young adults, ages 16-21, to all the aspects of Howard County living, including rental and homeownership opportunities. The Mid-Maryland Youth Council hosted the event.
- The Multi-Service Center Community Fair at the Whiskey Bottom Shopping Center in Laurel on June 14, 2014, offered community members an opportunity to meet face-to-face with service providers that are primarily located in Columbia. The Community Action Council, the Howard County Housing Department and the Howard County Department of Citizen Services were just a few of the providers available..
- The Housing Matters Mini Fair was also hosted by HCH on September 20, 2014, and featured 12 educational sessions – including, a first time homebuyer class taught in Spanish, fair housing and the role that background and credit checks play in the rental and homebuyer process; 18 industry professionals, a bus tour of affordable rental communities and prize drawings. This event is an opportunity for those interested in Howard County living, homeownership and rental information to learn more and meet face-to-face with industry professionals in a setting that is more intimate than the annual Housing Fair.
- The Mortgage Late? Don't Wait! Foreclosure Prevention event was held on October 11, 2014, in partnership with the MD Department of Housing and Community Development at the North Laurel Community Center. The event provided more than 90 homeowners facing foreclosure, an opportunity to meet face-to-face with lenders, housing counselors as well as attorneys.
- The Department of Citizen Services, Office on Aging hosted the 50 Plus Expo on October 17, 2014 at Wilde Lake High School. The event specifically targets Howard County residents over the age of 50. HCH participated in the event.

- Housing Tours – HCH receives requests to host housing tours and presentations throughout the year from a myriad of community groups and industry stakeholders. These events not only showcase that the successful development of affordable, quality housing is possible, but they also provide an opportunity to highlight the continued growing need for affordable housing both locally and throughout the region. There are 2 or more tours given in a given year and these tours usually last 2-3 hours. Tours are initiated by a request to HCH. The organizations that requested tours are:

- Leadership Howard County;
- The Substance Abuse and Mental Health Services Administration (SAMSHA);
- The Oakland Mills Village Community Association;
- The Housing Opportunities Commission of Montgomery County;
- The Opportunity Collaborative; and
- The Baltimore Regional Housing Partnership.

In addition to hosting and participating in these outreach events, HCH successfully engaged the community by:

- Participating on a variety of boards and committees, including, but not limited to the Limited English Proficiency, Ethnic Roundtable, Local Health Improvement Board, the Board to Promote Self-Sufficiency, the Committee to End Homelessness, the Workforce Development Youth Task Force, the Financial Literacy Workgroup, the Workgroup to End Hunger , Getting Ahead Coalition, Local Children’s Board, Re-entry Coordinating Committee;
- Providing staff support to the Division of Citizens Services Grant Review Committee for the County Community Services Partnership grant program (CSP) HCH participates in the rating and ranking of grant requests from nonprofit organizations in the County;

- Administering a Housing Choice Voucher Program and the associated Family Self-Sufficiency Program which requires a Public Coordinating Committee, comprised of local government and business officials.
- Serving as a member of the Opportunity Collaborative, Housing Committee and the Baltimore Regional Fair Housing Group committees. Each engages with local and regional stakeholders and service providers; and
- Hosting its first Getting Ahead Group, as a part of the overall Getting Ahead initiative, sponsored by (Board to Promote Self-Sufficiency. The purpose of the group is to help individuals in poverty build their knowledge base, resource tool kit, and network to gain the opportunity to create a more prosperous life for themselves, their families, and their communities.

F. Summary of Public Comments

There were not Public Comments, nor were any written comments received during the FFY15 Action Plan development process. On May 4, 2015, the Howard County Council voted to approve Resolution No. 43-2015 for submission of the FFY15 Action Plan to HUD.

II. Sources of Funds

A. Federal Resources (Entitlement Funds)

Each year the County solicits applications for funding under the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Projects must be consistent with the goals identified in the County’s most recent Consolidated Plan. The federal resources to implement these projects are a combination of CDBG and/or HOME funds and any program income received (PI) as a result of repayment from loans made with CDBG and HOME.

Funding Sources	Amount
Community Development Block Grant	\$1,005,824.00
CDBG Program Income Estimate	\$11,858.13
HOME	\$310,681.00
HOME Program Income	\$0
Total Action Plan Budget	\$1,328,363.13

It is estimated that one hundred percent of CDBG funds will be used for activities that benefit persons of low-and moderate-income. When an activity benefiting a limited clientele is implemented, at least 51 percent of those benefited will be low- or moderate-income persons. It continues to be the County's goal to serve 100 percent low- and moderate-income persons.

B. Additional Federal Resources

The County also receives funding under the Housing Choice Voucher Program (HCV). In FFY2014 the County received \$9,366,948.00. The amount available for FFY2015 is \$10,171,699.00.

C. Additional Federal, State and Local Funds for the Continuum of Care (CoC) through the CoC Lead Agency

The Howard County Department of Citizen Services (DCS) is the Lead Agency for the Howard County Continuum of Care, and administers the County's federal, state and local grants to support efforts to end and prevent homelessness in Howard County. DCS staffs the Howard County Board to Promote Self-Sufficiency (also serving as the Continuum of Care Board) and its various committees to address issues related to emergency shelter, transitional and permanent housing, crisis intervention and prevention of homelessness. DCS also oversees the Coordinated System of Homeless Services (CSHS), as part of its role as the Lead Agency of the CoC funds in Howard County. DCS works to ensure that the activities of County agencies are complementary and avoid duplication of effort. The following funding sources support homelessness prevention, intervention and permanent housing activities for those experiencing homelessness during FFY2014 and FFY2015:

Federal Grant Activity (FFY14 Awards)

Continuum of Care, Housing and Urban Development Grant Awards

➤ **Continuum of Care (MD-504)**

- Permanent Housing For Homeless Persons with Disabilities - \$ 663,588
- Transitional Housing For Homeless Families - \$71,849
- Shelter Plus Care (S + C) - \$ 166,770
- Planning Grant - \$11,225

➤ **Emergency Food and Shelter National Board Program (EFSP) (Phase 32)**

- To Be Determined via State Set Aside Committee

State of Maryland Grant Activity

Maryland Department of Housing and Community Development (DHCD)

- **Emergency Solutions Grant Non-Entitlement (ESG) - \$ 120,650** (*award for grant period of October 1, 2014 through September 30, 2016*)
 - Emergency Shelter
 - Homelessness Prevention

- **Rental Assistance Program (RAP) - \$40,000**
 - Rental Subsidy (amounts based on family size)

- **Maryland Department of Human Resources (DHR), through June 30, 2015**
Emergency and Transitional Housing/Homelessness Prevention Program (ETHS/HPP) \$72,602
 - Mass Shelter
 - Eviction Prevention/One Month's Rent

- **Maryland Department of Human Resources (DHR), through June 30, 2015**
Service Linked Housing (SLH) \$18,000
 - Housing Advocacy – Homelessness

Howard County Government Grant Activity

- CFY 15 Department of Citizen Services Local Funding for the *Plan to End Homelessness*, \$1,180,468
 - Housing Subsidies, Housing Stability Subsidy Program, \$179,709
 - Shelter Diversion Program, Case Management and Step Down Subsidy, \$186,659
 - Flexible Financial Assistance, \$264,600
 - Addictions Treatment, \$50,000
 - Coordinated System of Homeless Services, Staff and Case Management, \$231,500
 - Employment Supports, \$72,000
 - Case Management for Permanent Supportive Housing CoC Program, \$80,000
 - Family Stability Initiative, \$50,000
 - Landlord Guarantee Program, \$33,000

The 2011-2015 Consolidated Plan details the action steps to be taken to end chronic homelessness over several years, including Program Year 2015. For background information, please refer to Table 1C Summary of Specific Homeless/Special Needs Objectives.

Table 1C
Summary of Specific Homeless/Special Needs
Objectives

#	<u>Specific Objectives</u>	Sources of	Performance	Expected Number	Act	Outcome/Objective*
	<u>Homeless Objectives</u>					
SL-1	Provide emergency shelter to individuals and families that are newly homeless.	CDBG DHC D / MAH T	Persons / Units	150 persons 1 Unit		Suitable Living Environment/ Availability- Accessibility
SL-1 SL-2 DH-1 DH-	Acquisition of real property to serve individuals / families who are newly homeless, supporting a “Housing First” model.	CDBG / DHCD/MAHT Local Funds	Persons / Families Served	11 Units		Decent Housing /Availability Accessibility Affordability
DH-2 SL-1	Coordination of activities and funding opportunities to support the goals and objectives of the Howard County Plan to End Homelessness.	CDBG Local Funds	Persons / Families Served	145 individuals annually		Suitable Living Environment /Availability - Accessibility /Decent Housing/ Affordability
	<u>Special Needs Objectives</u>					
DH-2	Assist Non-Profits with rehabilitation of Group Homes serving persons with disabilities.	HOME Local Funds State Bond Bill HOME- CHDO	Units	1-3 Units Annually		Decent Housing / Affordability
	<u>Other Objectives</u>					

- **Cold Weather Shelter** – The Cold Weather Shelter operates from November through March each year and provides beds for up to 25 individuals/families in church facilities provided by the faith community. Congregations throughout the County provide shelter on a rotating basis. Shelter is included with bathing facilities and meals at each location.
- **Emergency Motel Shelter** - This activity will provide shelter for families when the emergency shelter is at capacity. Families in need of shelter can stay for 15 days while they work with the Grassroots Crisis Intervention Center’s staff to find alternative housing and services. There are approximately three vouchers available at any one time

to provide overflow accommodations.

- **U.S. Route 1 Day Resource Center** - This activity provides a day center for homeless persons that are primarily unsheltered and living outdoors along the U.S. Route 1 Corridor. Homeless individuals can receive a hot meal, non-perishable food items and hygiene items to take with them, clothing and survival supplies. At the Center, they may shower, launder clothes, use computers, and meet with a social worker to access additional case management, healthcare and other critical support services. Healthcare services are now provided at the Center by volunteer medical practitioners. The Center is open three days a week and serves approximately 35-70 persons a day.
- **U.S. Route 1 Free Clinic** – Between 140 and 180 patients receive health care services at the U.S. Route 1 Day Resource Center Free Health Clinic. Volunteer physicians and other medical personnel provide basic health screenings and examinations at the Center. Physicians in the community provide limited pro bono services in the following areas: cardiology, Ob-Gyn, pulmonology, neurology, orthopedics, dermatology and dentistry. Referrals are provided as needed for those requiring additional medical attention.
- **SOBER House** – SOBER Houses provide a group residential setting for four to five homeless persons with addictions who seek sobriety and a change in their lifestyle to maintain stable housing. Two sober houses opened in 2013, as an initiative through the County's Plan to End Homelessness. There are currently four sober houses for homeless persons in Howard County.
- **Continuum of Care Permanent Supportive Housing (PSH)** - The Howard County Housing Commission provides rental assistance for 35 households experiencing homelessness with a disability, and prioritizes those who are defined as Chronically Homeless. There are a total of five projects that are funded through the CoC competition, which also provide supportive services (case management) to ensure the households have the resources needed to remain stably housed. PSH in Howard County does not limit the amount of time a household can remain in the program, and are scattered site locations. Case Management services are provided by Volunteers of America Chesapeake.
- **Continuum of Care Transitional Housing** - Partnering with the CoC Lead Agency, the Department of Citizen Services, Bridges to Housing Stability provides the transitional housing program to make it possible for each household to reach housing stability. Housing Advocates work with each household to identify solutions to barriers in order for the family to maintain permanent housing after exiting the transitional housing program. Families are able to stay in the program for up to 24 months.
- **Continuum of Care Shelter Plus Care (S+C)** – The Mental Health Authority provides permanent supportive housing to nine households who have a household member who has a diagnosed mental illness and meets the definition of homelessness at program intake. The Mental Health Authority provides case management support through a local human service agency, Alliance, Inc., to ensure all households are maintaining their permanent housing and accessing needed resources in the community.
- **Housing Stability Subsidy Program (HSSP)** - This County-funded subsidy program focuses on ending homelessness through the provision of rental assistance and case management. The program serves homeless households that have been unstable for extended periods of time over many years in Howard County and provides a local rent

subsidy. This program currently supports 16 households.

D. Plan for Leveraging Private and Non-Federal Funds

The County will continue to use all federal, state and private resources currently available to develop and expand affordable rental opportunities, homeownership options for low- and moderate-income households, and to promote other critical community sustainability initiatives.

The Housing Commission is utilizing a combination of State-issued tax-exempt bonds, Partnership Rental Housing Program funds, LIHTC tax credits, County loan funds, and Housing Commission equity to finance acquisitions and/or redevelopment that assists low to moderate income households of Howard County.

A proposed budget of \$ 2,625,000.00 for the County's Housing Initiative Loan Fund has been requested for County fiscal year 2016. The County does not anticipate having any CDBG float-funded activities.

III. Summary of Specific Annual Objectives (Table 3A)
Summary of Specific Annual Objectives (FFY2015)

Goal 1. Housing - Expand opportunities for diverse and affordable housing options that are available for all income levels at our below 80% of AMI (Area Median Income).				
Strategy	Source of Funds	Objective	Outcome	Estimated Outputs
Homeownership Assistance through moderate income housing unit (MIHU), shared appreciation, and settlement down payment loan programs (SDLP) for housing targeted to households earning between 60% and 80% of AMI.	County SDLP County MIHU HCH Commission Equity	Decent Affordable Housing	Affordability Availability Accessibility	Approximately 45 households could become homeowners through the MIHU program during this program year. Approximately 15 households will be qualified to lease homes from HCH and offered the option to purchase the homes within 3 years.
Continue to expand, modify and market existing homeownership programs for low/moderate income buyers.	Local Funds	Decent Affordable Housing	Affordability	Approximately 600 individuals will receive homebuyer and credit counseling. 400 @ Homebuyer Workshops and 200 @ MIHU Workshops
Provide assistance to assist displaced renters due to County redevelopment projects.	Housing Commission Bonds / CDBG	Suitable Living Decent Affordable Housing	Availability Affordability	Approximately 30 households will receive relocation assistance. (Howard County) Ellicott Terrace Relocation 20 Households
Affordable rental housing opportunities offered through partnerships with local non-profit agencies to provide housing for households earning between 40% and 60% of AMI	County Housing Initiatives and HCH line of credit CDBG	Decent Affordable Rental Housing	Affordability Availability Stability	Approximately 10 homes will be acquired and renovated to provide rental housing units to low-income clients of the local non-profit, Bridges Alliance. Approximately 1 family assisted with Affordable Rental Opportunity through acquisition by partner Help End Homelessness, Howard County, Inc. (1 unit)

Goal 2. Homelessness - Comprehensively address the issue of homelessness by providing a Continuum of Care system that utilizes a “Housing First” approach to homelessness prevention and intervention.				
Strategy	Source of Funds	Objective	Outcome	Estimated Outputs
Provide emergency shelter to individuals and families that are newly homeless.	CDBG	Suitable Living Environment	Affordability Availability Accessibility	Domestic Violence Safehouse 20 households. (1 Public Facility) Approximately 15 individuals served through Transitional Housing (Hope Works)
Coordinate activities and funding opportunities with the Department of Citizen Services in support of their oversight efforts for the Continuum of Care.	CDBG Federal	Suitable Living Environment	Affordability Availability Accessibility	Approximately 60-75 individuals will be served by the U.S Route 1 Day Resource Center. Construction of New Day Resource Center; with 35 Single Efficiency Apartments Housing Opportunity for People with Aids (HOPWA) 22 households Rental Assistance Program (RAP) 10 households

Goal 3. Self-Sufficiency – Expand and support a variety of affordable housing options, which in conjunction with needed supportive services, will maximize opportunities for residents to achieve both social and economic self-sufficiency.

Strategy	Source of Funds	Objective	Outcome	Estimated Outputs
Support Programs and initiatives that improve/increase access to a variety of employment opportunities for low-moderate income persons by promoting geographical or occupational mobility and up skilling current Para-professional workers to professional or management certified employment levels.	HUD - FSS	Creating Economic Opportunities	Availability	70 Families will receive Family Self Sufficiency (FSS) financial Counseling
Acquire and/or rehabilitate group home for persons with disabilities.	HOME	Decent Affordable Housing	Affordability	CHDO Activity-1-2 units
Continue to support programs that serve low to moderate-income elderly homeowners and those with disabilities to rehabilitate their homes to meet emergency needs and/or improve accessibility.	DHCD/MHRP CDBG	Decent Affordable Housing Create Economic Opportunity	Affordability Availability Accessibility	Single Family Rehabilitation Program – 5 units Approximately 20 households will receive Financial Education (Financial Literacy)
Work with Howard County non –profits to assist households under 60% median income of Howard County that are near homelessness	Local	Decent Affordable Housing	Affordability Availability Accessibility	Bridges Alliance – Create 10 units a annually for families; with case management services

Goal 4. Community Sustainability – To plan, design and support local, regional projects and initiatives that incorporate such elements as: green technology, pollution prevention technology, community-based amenities and services, environmental restoration, and long-term, resource-rich public and private partnerships that can persist across generations.

Strategy	Source of Funds	Objective	Outcome	Estimated Outputs
Support the development of community-based facilities that meet the needs of senior residents, working families and local businesses.	CDBG	Creating Economic Opportunities/Suitable Living Environment	Availability Accessibility	Roger Carter Center Re-development -500 Day Resource Center Pre-Development and Construction
Encourage collaborations around developing physical, environmental, economic and social assets that highlight the importance of creating communities where people want to “live and work, now and in the future”.	CDBG	Creating Economic Opportunities	Accessibility	N/A

Goal 5. Resource Management – Foster intra-governmental and public/private partnerships that promote effective and efficient use of tangible resources such as goods and equipment, financial and labor resources.

Strategy	Source of Funds	Objective	Outcome	Estimated Outputs
Administer and monitor entitlement programs under the Consolidated Plan	CDBG HOME	N/A	N/A	CDBG Administration HOME Administration
Support the Community Action Council of Howard County with the goal of Homelessness Prevention	CDBG	Decent Housing	Affordability	Approximately 25 households will be assisted to prevent homelessness. (70 people)

IV. Activity Descriptions of Proposed Projects and Outcome Measures

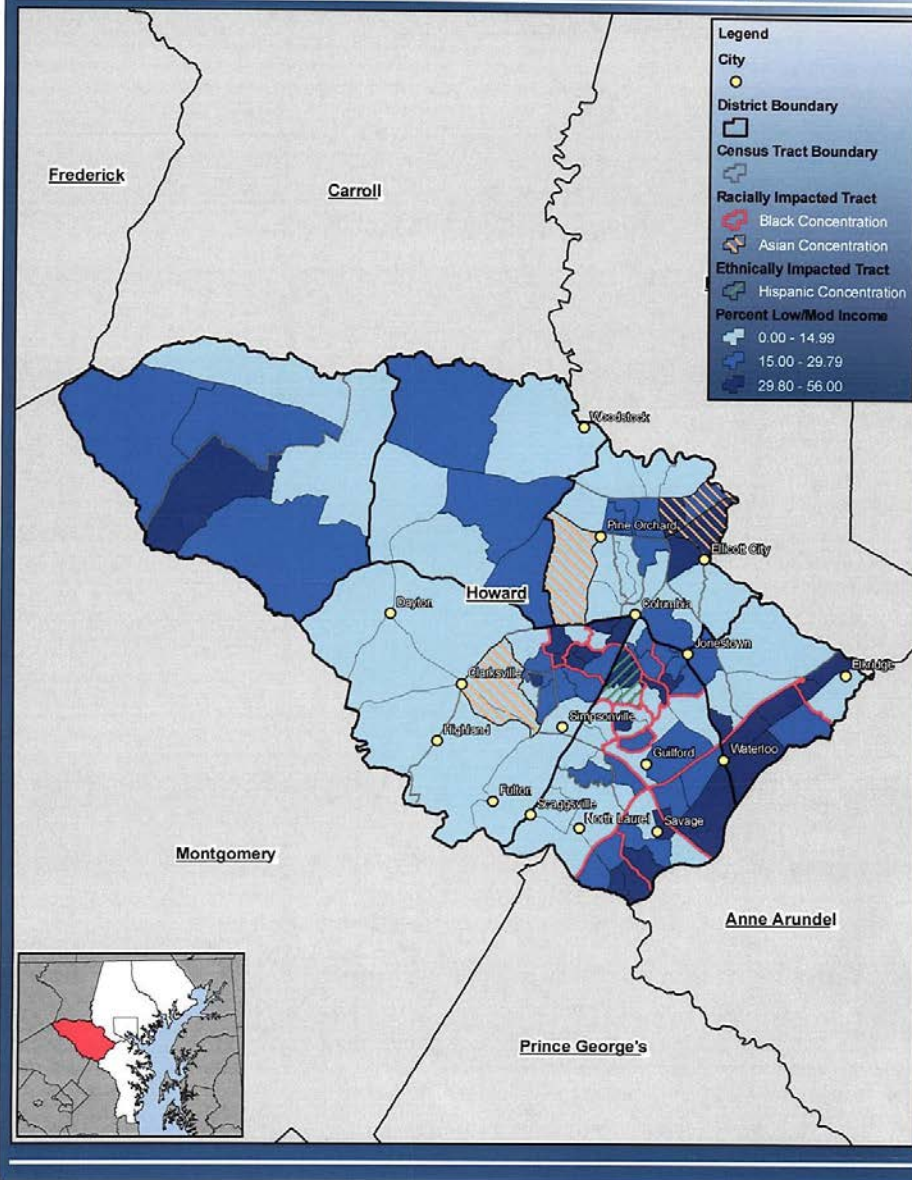
This Action Plan is the fifth annual plan under the County's Five-Year Consolidated Plan. This is the eighth year in which HUD's Outcome Performance Measurement System (OPMS) has been incorporated. Objectives and outcomes are shown for each project in the Action Plan. OPMS data will be entered into the HUD Integrated Disbursement and Information System (IDIS) at the "activity" level. Outcome indicators will also be included with each project. The County's quarterly report form has been revised to reflect HUD's OPMS. The "Table 3C" format is used to provide a listing of projects and descriptions, funding and other information required by IDIS.

V. Geographic Distribution

For detailed information on the 2010 Census Race Characteristics go to the Department of Planning and Zoning link on the County web page at www.howardcountymd.gov . It is important to note that Howard County continues to allocate its investment in CDBG funds on a very broad countywide basis and does not plan to dedicate substantial resources to specific targeted areas. For all seven (7) of the CDBG activities included in this Action Plan, the target area is county-wide. Sub-recipients implementing the various projects report demographic information on quarterly reports which is entered into the IDIS database. The information is then reported in the Consolidated Annual Performance and Evaluation Report (CAPER), which provides the general public as well as HUD representatives, the opportunity to review the race and ethnicity as well as the income levels of all persons being served by the CDBG and HOME program.

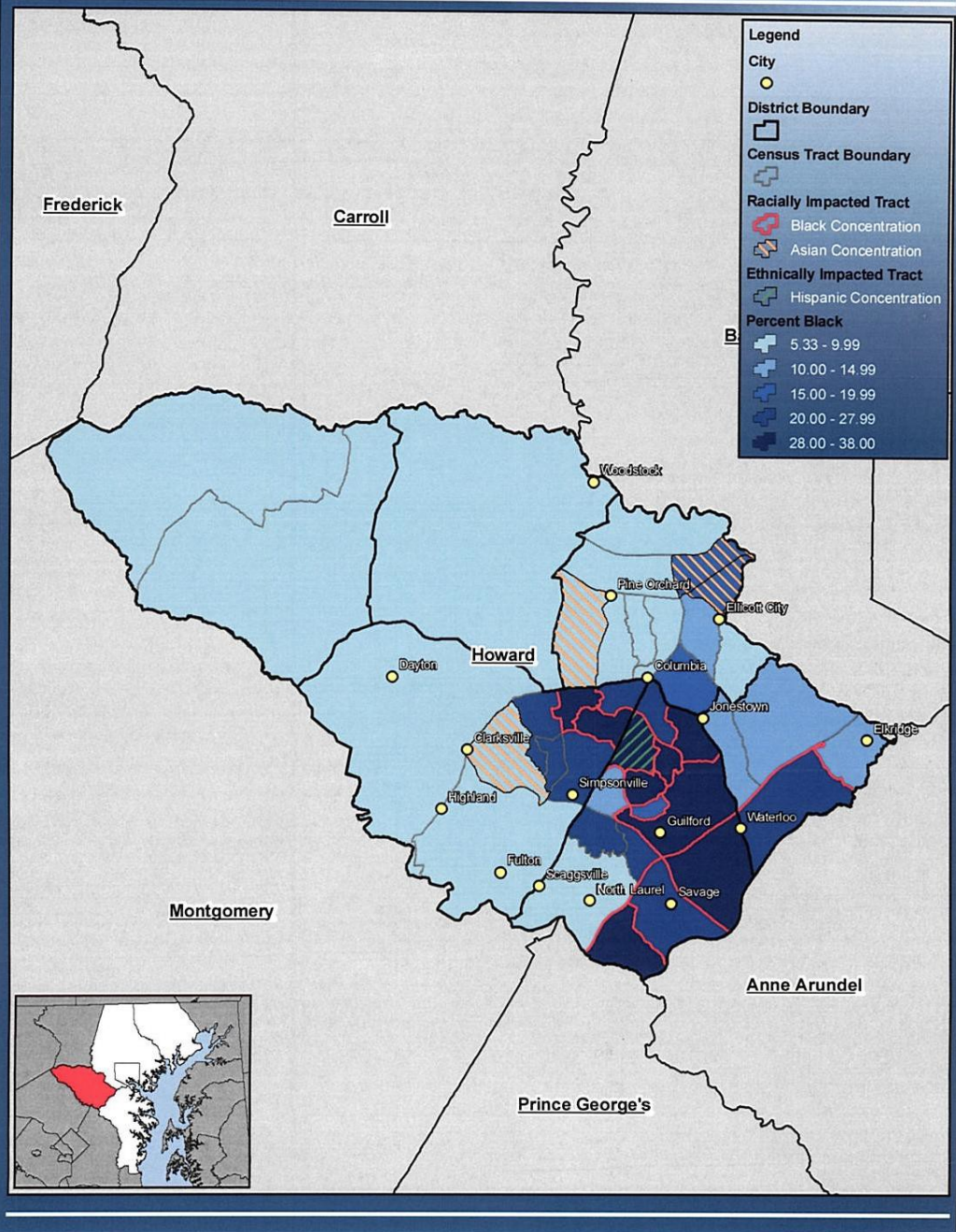
**Map 5: Low and Moderate income Areas and
Areas of Minority Concentration, 2009**

Baltimore Regional Analysis of Impediments to Fair Housing Choice



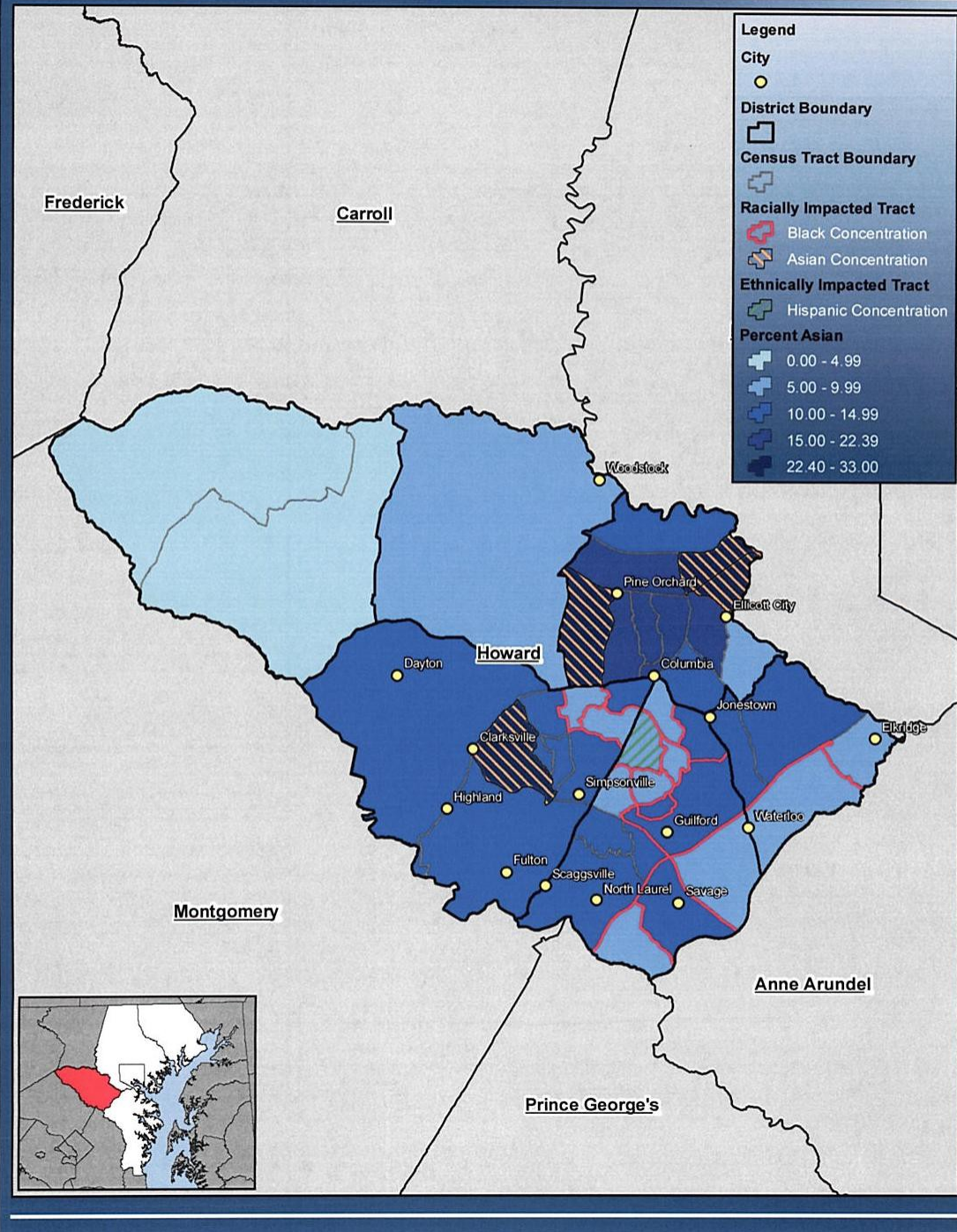
Map 1: Concentration of Black Residents in Howard County, 2009

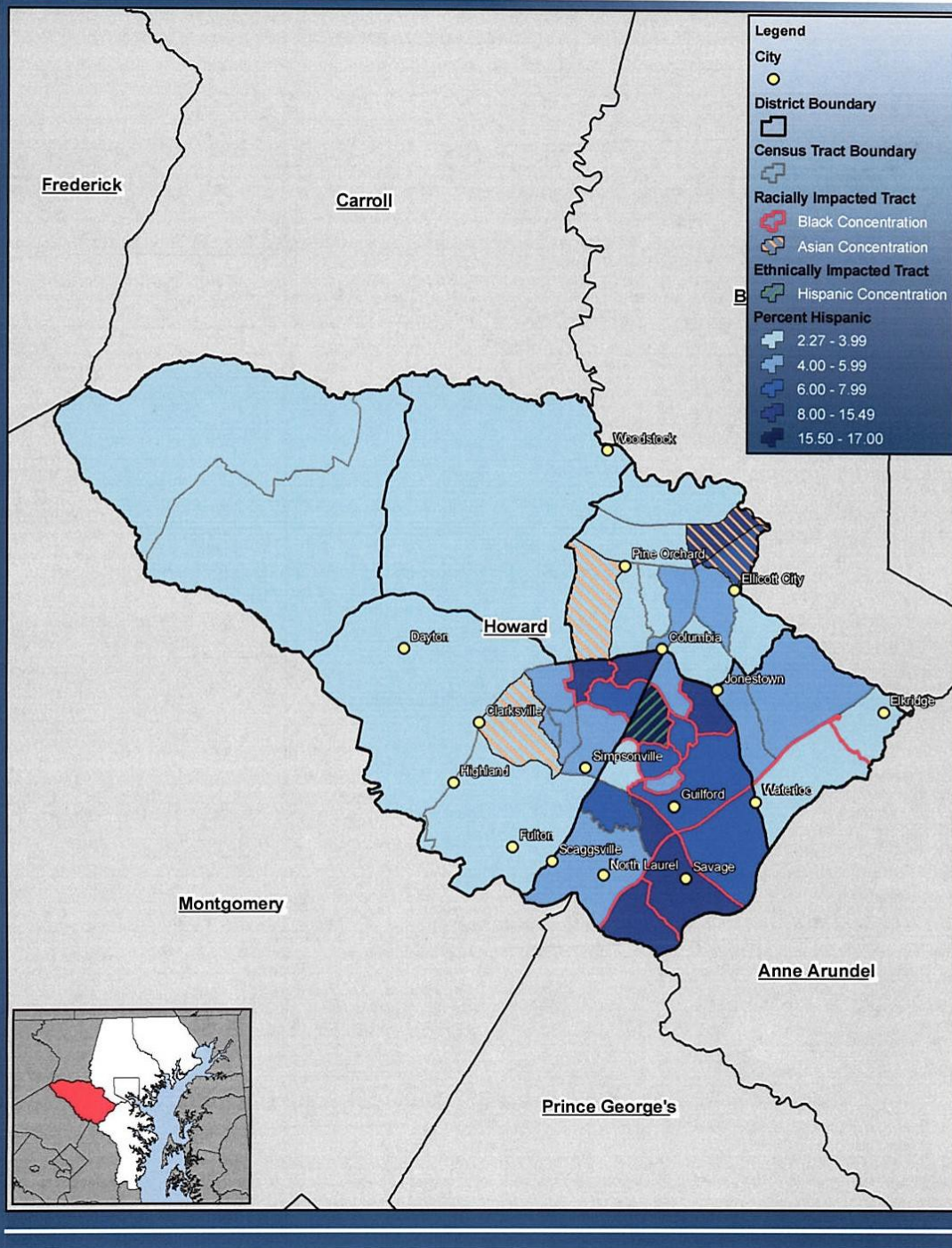
Baltimore Regional Analysis of Impediments to Fair Housing Choice



Map 2: Concentration of Asian Residents in Howard County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice





VI. Homeless and Other Special Needs Activities

Howard County is very active in serving the needs of its homeless populations. In 2010, the County, specifically the Board to Promote Self Sufficiency (BPSS) and its Committee to End Homelessness (CEH), drafted a Plan to End Homelessness which focuses on homelessness prevention and rapid re-housing as well as providing other important services to the homeless, including healthcare and job training. Since FY 2013, the County has funded programs for this purpose. These programs are described in detail below.

A. Programs to Address Priority Homeless Needs

The BPSS supported the initiatives funded in Howard County since FY13 for the Plan to End Homelessness, including the development of a single-point-of entry system for persons experiencing homelessness, or a housing crisis to access services in Howard County. The Coordinated System of Homeless Services (CSHS) is now in its third year, and its major components are:

- A single-point-of-entry (SPE) at Grassroots Crisis Intervention Services, where crisis counselors attempt to divert callers from becoming homeless and refer those cases where diversion is unsuccessful to the CSHS.
- Every household referred to CSHS is assigned a case manager who conducts an in-depth assessment, connects clients to needed services, and works with the client to achieve housing stability.
- Dedicated resources for addiction treatment are available. They are administered by the Health Department, to provide rapid access to addictions treatment upon request of the homeless in the CSHS.
- Flexible Financial Assistance (FFA) helps households retain their housing or secure new housing and can be used for other expenses that can contribute to instability.
- A Service Coordinator monitors client progress, system partners, data and resource needs.
- The Homeless Management Information System (HMIS) was enhanced to better manage data and contribute to the strategic decisions necessary for effective implementation of the CSHS.

Housing Stability is the ultimate goal for all persons experiencing homelessness in Howard County. The CSHS coordinates with the Howard County Housing Commission to administer the local subsidy program, the Housing Stability Subsidy Program (HSSP).

CSHS Update: Over the past year, the CSHS has expanded and shifted to meet the needs of those experiencing a housing crises or homelessness. Using data gathered throughout the HMIS, CSHS assisted in redirecting interventions for clients based on need, and increased coordination between service agencies.

Specifically, the CSHS has accomplished the following:

- Assess each client who presents at the single-point-of-entry according to their **vulnerability** and service needs. The crisis counselors identify people experiencing homelessness according to the fragility of their health accounting for mortality risk factors and their current length of homelessness. This allows Howard County’s most vulnerable homeless persons to be placed into permanent supportive housing and access to relevant supports for those who have severe health risks.
- **Established Partners:** The CSHS works as a partnership between various Howard County service-agencies. Because households experiencing homelessness or imminent risk of homelessness have varying needs, the CSHS requires multiple types of partners to successfully assist them to become stably housed. The following are the primary established partners for the CSHS:
 - Howard County Department of Citizen’s Services, Grassroots Crisis Intervention Center, The Community Action Council, The Salvation Army, The Multi Service Center, Bridges to Housing Stability, HopeWorks, Inc. (formerly the Domestic Violence Center), The Housing Commission of Howard County, Howard County Public Schools, Howard County Health Department, Humanim, Inc., Family and Children Services, LARS, and Volunteers of America Chesapeake (VOAC).
- Howard County’s Coordinated System of Homeless Services’ **System Flow** includes various types of interventions according to each household’s needs. The flow is as follows:
 - Single Point of Entry: Client calls and crisis counselors complete a needs assessment, and provide a referral to either Prevention Services or Assessment & Diversion phase.

Prevention Services: If household is referred to Prevention Services (after the SPE, or seeking assistance on their own), they may be eligible to receive Eviction Prevention or First Month’s Rent Assistance. Prevention Services include homeless prevention through a one-time crisis assistance and resource navigation, for additional supports (if unable to sustain their current housing with one-time crisis assistance).
 - Assessment & Diversion: If household is referred for more intensive supports through Assessment & Diversion, they are provided with Relocation Assistance, Crisis Intervention and Veterans Assistance (as applicable). This phase includes a uniform homeless assessment, problem solving to divert households from homelessness, and referrals to more intensive system resources for households that cannot be diverted from their housing crisis.

- Progressive Engagement: If a household is provided with services through Assessment & Diversion and still needs additional supports, they move to the Progressive Engagement phase. This includes employment supports, crisis services, connection to public benefits, financial coaching, legal assistance, pupil personnel worker support (for homeless school-age children), veteran's assistance, and older adult services, as needed. Progressive Engagement provides ongoing connection to additional supports and services in order to move the household to housing stability.
- Intensive Supports: If a household does not resolve their crisis at the SPE, they move to the Intensive Supports phase for support services to obtain and maintain housing. This includes Case Management, Short Term Shelter (emergency shelter, temporary housing, motel shelter, safe house), the Family Stability Initiative, Shelter Diversion, Addictions Treatment, and County-funded Flexible Financial Assistance.
- Housing Stability: This is the final stage of the Coordinated System of Homeless Services, where a household achieves stable housing, which may or may not include ongoing support. Achieving housing stability may include placement in permanent supportive housing, subsidized permanent housing, non-subsidized permanent housing, or relocation to family/friends home. At any point during the above described phases, a household may reach housing stability; a household does not need to receive all the services described in order to reach housing stability.

Follow-Up with households that have exited the system will be conducted in the three- to -nine month timeframe after the household has left the system to confirm stability and success of interventions while in the system.

In CFY 2015, the County is working to:

- Support the expansion of the CSHS to include additional partners and resources.
- Support the Small Efficiency Apartment (SEA) project, serving those who are experiencing chronic homelessness and who are known to the human service community as having the highest housing barriers.
- Develop strategies to identify and meet the employment needs of the homeless.
- Ensure Continuum of Care's funding for permanent supportive housing and transitional housing is maintained and increased through annual HUD competitions, to ensure households remain stably housed.
- Continue to support the Housing Stability Subsidy Program.

FY2015 Budget Recommendations/Implications

The proposed budget recommendations for FY15 includes continuation of FY14 initiatives: support for the Coordinated System of Homeless Services, rapid access to addictions treatment, continued funding for FY14 housing subsidies and flexible financial assistance for System households; as well as additional housing subsidies and employment supports.

B. Programs to Address Special Needs

The 2011-2015 Consolidated Plan details the action steps to be taken to end chronic homelessness over several years, including Program Year 2013 and 2014. For background information, please refer to Table 1C Summary of Specific Homeless/Special Needs Objectives. (*See Goal 2 in this plan.*)

This FFY2015 Action Plan seeks to provide multiple avenues where homeless individuals and families can move out of transitional facilities into permanent housing, and to support County-wide, anti-poverty strategies. The following proposed projects focus on supportive services and providing funding to community-based non-profit organizations, to be used for homelessness prevention and life-skills training.

- The Cold Weather Shelter operates from November through March each year and provides beds for up to 25 individuals/families in church facilities. Shelter is provided by the faith community by congregations throughout the County on a rotating basis. Shelter is included meals at each location.
- Emergency Motel Shelter - This activity will provide shelter for families when the emergency shelter is at capacity. Families in need of shelter can stay for 15fifteen days while they work with the Grassroots Crisis Intervention Center, Inc.'s staff to find alternative housing and services. There are approximately three vouchers available at any one time to provide overflow accommodations.
- U.S. Route 1 Day Resource Center - This activity provides a day center for homeless persons that are primarily unsheltered and living outdoors along the U.S. Route 1 Corridor. Homeless individuals can receive a hot meal, non-perishable food items and hygiene items to take with them, clothing and survival supplies. At the Center, they may shower, launder clothes, use computers, and meet with a social worker to access additional case management, healthcare and other critical support services. Healthcare services are now provided at the Center by volunteer medical practitioners. The Center is open three days a week and serves approximately 35-70 persons a day.

- U.S. Route 1 Free Clinic – Between 140 and 180 patients receive health care services at the U.S. Route 1 Day Resource Center Free Health Clinic. Volunteer physicians and other medical personnel provide basic health screenings and examinations at the Center. Physicians in the community provide limited pro bono services in the following areas: cardiology, Ob-Gyn, pulmonology, neurology, orthopedics, dermatology and dentistry. Referrals are provided as needed for those requiring additional medical attention.
- SOBER House – SOBER Houses provide a group residential setting for four to five homeless persons with addictions who seek sobriety and a change in their lifestyle to maintain stable housing. Two sober houses opened in 2013, as an initiative through the County’s Plan to End Homelessness. There are currently four (4) sober houses for homeless persons in Howard County.
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- Continuum of Care Shelter Plus Care (S+C) – The Mental Health Authority provides permanent supportive housing to nine (9) households who have a household member who has a diagnosed mental illness and meets the definition of homelessness at program intake. The Mental Health Authority provides case management support through a local human service agency, Alliance, Inc., to ensure all households are maintaining their permanent housing and accessing needed resources in the community.
- Housing Stability Subsidy Program (HSSP) - This activity focuses on ending homelessness through the provision of rental assistance and case management. The program serves homeless households that have been unstable for extended periods of time over many years in Howard County and provides a local rent subsidy. This program currently supports 16 households.
- Small Efficiency Apartments (SEA) - The Howard County Housing Commission, in partnership with Volunteers of America Chesapeake (VOAC), will develop and construct 35 small efficiency apartments in connection with the Day Resource Center, in an effort

to house single, chronically homeless adults and provide resources with onsite health care, job search, and counseling to enable persons to obtain and maintain self-sufficiency. The facility will be operated by VOAC.

Special Needs Populations in Howard County

In addition to these efforts, Howard County is also trying to serve more specialized populations. Through the Point in Time Count, an effort to capture all persons and populations experiencing homelessness, Howard County identified some homeless veterans. Three were counted during the 2015 Point in Time (PIT) survey, two of those in households with children. Eight were counted in 2014 , and nine in 2013; eleven were identified in the 2014 Annual Homeless Assessment Report (AHAR) and nine in the 2012 AHAR. The AHAR report covers a year as opposed to the single night of the PIT. No Veterans Affairs Supportive Housing (VASH) vouchers are available in the County. Homeless veterans are referred to the Veterans Administration (VA) in Baltimore for services as well as to Alliance Veterans Housing Outreach and Assistance. A staff person from the VA and a representative from Alliance attend the County's CoC and Plan to End Homelessness meetings. The County also refers all homeless veterans to the Maryland Center for Veterans Education & Training (MCVET), as appropriate.

The Howard County Police Department escorts unaccompanied and potentially homeless youth to Grassroots Crisis Intervention Center, Inc. (Grassroots), the County's crisis intervention center and emergency shelter. Working together, the shelter and the police determine if the youth has been reported as a runaway. Grassroots attempts to contact the parents or guardian and may report the situation to the Department of Social Services Child Protective Services. Grassroots follows the policy of reporting any unaccompanied youth to the proper authorities to ensure the safety of the child. The number of unaccompanied youth in the County is very low. There were seven unaccompanied youth identifies in the 2015 PIT count, based on the HUD definition of 'youth' – 24 and under. There were no unaccompanied minors (under 18). There were no unaccompanied youth identified during the 2014, 2013 or 2012 PIT Counts.

Plan to End Homelessness

- In 2009, the Howard County Board to Promote Self-Sufficiency charged its Committee to End Homelessness (CEH) with developing a Howard County Plan to End Homelessness (the Plan). The CEH mobilized more than 50 committed participants from human service agencies, local government and the community, forming task groups to study the situation in Howard County

and best practices for ending homelessness that have been successful in other communities.

- In November 2010, the CEH issued the Howard County's Plan to End Homelessness which outlined current efforts to address the problem of homelessness and focused on two principal methods of ending homelessness with Prevention and Housing First best practices. The Plan offers strategies to deal with the two main categories of homelessness: chronic and situational homelessness. It also addressed support services, such as emergency medical care and public safety, and called for the CEH to continue to develop more detailed financial projections. Finally, the Plan provides a process to monitor implementation of the strategies.
- The Committee's policy statements were adopted by the Association of Community Services. In addition, the Committee was asked by the Governor's Office to work with their efforts to End Childhood Hunger in Maryland. By addressing homelessness in the County, poverty is also alleviated. Since the original formation of the Plan to End Homelessness, the Committee to End Homelessness (CEH) disbanded, as the Coordinated System of Homeless Services began forming community partnerships around the PEH activities, in response to HUD's directive to implement a coordinated assessment system. Since then, the CoC Lead Agency has been coordinating activities outlined in the PEH to further the stated goals and meet HUD's directives. Additionally, the Lead Agency formed a CoC Steering Group to elicit community feedback and generate discussion related to the activities that are funded through the PEH, and the Continuum.
- The County's Plan to End Homelessness is in the process of being updated, to be completed by end of local fiscal year 2015. The update will elicit community feedback and workgroups to build upon the strategies to carry out existing Plan activities, through the CoC Steering Group. The primary strategies will continue to be homelessness prevention and Housing First best practices. Other initiatives to be implemented will continue to incorporate: strengthening mainstream services, health care, and helping the homeless obtain income to be self-sufficient.

VII. Other Actions

A. Addressing Obstacles to Meeting Under Served

The County's Action Plan identifies obstacles to providing affordable housing in the County and routinely reports on the actions taken to remove those obstacles.

Residents can experience a range of obstacles in these efforts to secure affordable housing, including access to transportation, employment and community amenities, such as healthcare, libraries, recreation/social centers, schools and shopping. Administrative hindrances to the creation and development of affordable housing are reborn out of a lack of a lack of financial

resources to preserve existing affordable housing and create new affordable opportunities. Prohibitive practices of denying a resident access to housing based on a source of income and projects denied development approval by resistant neighbors – not only limits residents’ access to quality affordable housing opportunities, but also may have a discriminatory effect.

Howard County, Maryland, as an active member of the Baltimore Metropolitan Council, continues to work toward reducing disparities in affordable housing both locally and regionally. The platforms for this work are education and legislation, and the audiences are local and regional community members/neighbors, business owners, transportation officials, elected officials, other government, profit and non-profit partners, property owners, financial institutions, the beneficiaries of housing assistance and those still in need of housing assistance. Howard County Housing is working both independently and cooperatively with neighboring jurisdictions to expand the dissemination of factual information about affordable housing.

Dissemination of factual information includes accurately defining affordable housing and debunking stereotypes and old urban legends through the expansion of access to education on topics such as affordable rental, homeownership and preservation programs, fair housing law and being a responsible landlord. Raising awareness also requires the support of a regional campaign to accurately portray families benefiting from housing assistance (<http://considertheperson.org/>), support of the Regional Fair Housing Group (RFHG)’s submission of a regional Fair Housing Initiatives Program (FHIP) grant application and ultimate award of funding to do education and outreach; As well as attending community meetings to discuss community development and planning, and the role affordable housing plays in any neighborhood.

These actions are directly related to efforts to i n t r o d u c e , r e v i s e and update legislation that has an impact on affordable housing and educating decision makers about the purpose of legislation that supports the creation and expansion of affordable housing opportunities. Efforts to include the statutory expansion of the County’s Moderate Income Housing Unit Program, and support for the proposed statewide expansion of the source of income protections that currently benefit Howard County residents, or the support of a change in manner in which local approval requirements impact financing of affordable housing projects.

B. Affordable Housing

Actions Taken to Address Barriers to Affordable Housing

HCH remains steadfast in its effort to increase access to affordable housing opportunities. HCH increased the County's MIHU rental portfolio with the completion of Burgess Mill Station in Ellicott City, MD, last year. MIHU units make up 10 percent of the total units at Burgess Mill and more MIHU units are planned for Phase 2 when it is completed in 2016. Developers are in various stages of development to bring an additional forty-five affordable rental units to the County in 2015.

In the rental arena, Burgess Mills Station II is in the planning and pre-development stage. Burgess Mill Station II encompasses the redevelopment of the Ellicott Terrace apartment's located just steps away from Historic Main Street in Ellicott City. Ellicott Terrace sits upon a 3.924 acre parcel of land and is currently owned by the Howard County Housing Commission (HCHC). The \$16.5 million redevelopment effort includes the demolition of the existing structures and new construction of 60 mixed-income, sustainable, garden apartment homes. The building structures proposed for Burgess Mill Station II will consist of three garden apartment buildings with similar design elements and features to those that were so well received in Phase I. The units will be a combination of one, two and three bedrooms ranging from 698 square feet to 1,137 square feet.

The community will be a combination of affordable and market rate rental units. Of the 60 total units, 31 of those will be rented to residents making 30% to 60% of the area median income. Rent for the affordable units range from \$292 to \$1,135 per month, and the market rate units rent range from \$1,250 to \$1,825. These rents are fully supported by a market study completed by Valbridge Property Advisors which indicates an overall project capture rate of 1.9%, and a capture rate of 1.2% for the affordable units and 5% for the market rate units, all of which are extremely strong. In addition to the public and private funding sources, the county intends to invest approximately \$475,000.00 in HOME funds to be used for construction costs and approximately \$200,000.00 in CDBG funds for relocation assistance for displaced residents.

Burgess Mill Station Phase II will include several site enhancements and amenities designed to promote community connectivity and resident interaction. The new Roger Carter Community Center is located just to the north of the Burgess Mill Station Phase I site and directly

across the street from the subject site. The Roger Carter Center boasts an indoor/outdoor pool, children's splash park, running track, indoor and outdoor basketball courts, aerobics room, weight room, gymnasium, a preschool, activity room, meeting rooms, a rock climbing wall, and an outdoor community area that can be used for a farmer's market. The new Center is owned by the Howard County Housing Commission and is operated by the Howard County Department of Recreation and Parks. This Center was financed separately from Phase I and Phase II of the redevelopment efforts and is a great amenity for the residents to utilize and enjoy.

Burgess Mill Station will be designed to include various green features and will participate in Enterprise Green Communities to achieve green certification.

Relocation Plan: Burgess Mill Station II

The Housing Commission will temporarily relocate the existing residents at Ellicott Terrace during the demolition and construction phase to other Housing Commission-owned multifamily communities in Columbia, MD. The residents will continue to pay their same rent during the relocation period and will be relocated back to the newly-developed Burgess Mill Station II community upon completion. All relocation expenses will be covered by the Housing Commission and the overall relocation effort will be carried out in accordance with the state of Maryland relocation requirement and the federal Uniform Relocation Act (URA) requirements where applicable.

On the homeownership front, plans are underway to develop and build Greenwood Village, a community of 26 single-family detached homes in Jessup, MD. Greenwood Village will showcase many of the sustainable features and universal design elements which earned LEED Platinum certification in our recently completed project known as The Cottages at Greenwood. HCH will continue to reinvest the modest NSP grant fund proceeds received in 2009 from the Maryland Department of Housing and Community Development to purchase foreclosed properties in the East Columbia and North Laurel areas. As previously acquired properties are renovated and resold to households earning up to 120% of AMI, the sale proceeds will be used to purchase and renovate additional properties. These homes will be available for resale as perpetually affordable homeownership opportunities.

The County's Moderate Income Housing Unit (MIHU) program is a vital tool to increase affordable homeownership and rental housing opportunities in Howard County. Developers are required to build a certain percentage, usually 10-15%, of "for sale" or "for rent" units as MIHUs in certain zoning districts. MIHUs must be sold or rented to moderate income households, so the sale price and rents are calculated using an affordability formula based on the area median income in Howard County. For all sales, moderate income is defined as 80% of median income; for all rentals, moderate income is defined as 60% of median income. As of February 2015, MIHU agreements were signed with several developers to provide 100 new, for-sale units for moderate income households in seven communities within the County. As of February 2015, 434 rental units were occupied by MIHU tenants in Howard County. HCH is aware of several developers that are in various stages of plan submissions through the County's Department of Planning and Zoning for new construction for-sale and for-rent developments in 2015.

Purchasing a home can be difficult for many low/moderate income families because they lack the savings to meet the downpayment and closing costs requirements for the purchase. The County's Settlement Downpayment Loan Program (SDLP) provides assistance with those costs in the form of a deferred second mortgage that is recorded as a lien against the property. Payments are deferred until resale, refinance or default. The deferred payments do not affect buyers' qualifying ratios and they are usually able to obtain traditional FHA and Conventional mortgage financing.

A Lease Purchase program will begin in July 2015 and will allow HCH to acquire existing residential condominium units in communities that are at risk of de-stabilization. HCH will renovate the units and offer them for rent, with an option to purchase. The Lease-Purchasers will be households of moderate income, up to 80% of AMI, who could otherwise afford to buy a home except for credit or debt issues. HCH will manage the properties and provide homeownership and credit counseling to the Lease-Purchasers until the household is ready to buy, for up to three years. The purposes of this program are to stimulate the weakened condominium market in the County, provide communities with opportunities to re-stabilize with families making a long-term commitment to the property, and offer another source of affordable housing as part of a continuum of housing options.

HCH began a new partnership with a local non-profit, Bridges to Housing Stability, Inc., in December 2013. As the largest non-profit provider of supportive transitional and permanent housing for homeless families in Howard County, Bridges has developed a model, known as “The Bridges Alliance”, for creating affordable, stable and sustainable housing choices for those on the lower rungs of the County’s workforce. Through this partnership, there will be an increase of affordable housing stock available to low-income households and the development of a community collaborative that will form a circle of support to help build sustainable lifestyles for residents.

To date, the Commission has purchased, rehabbed and delivered six (6) units throughout Howard County for the Bridges Alliance.

Actions to Maintain Affordable Housing

The Shared Equity Program has been converted to the Permanently Affordable Housing Program. Traditionally mortgage banks prefer a first and second mortgage structure so that the loans can be bundled and sold into the secondary mortgage market. Two key components are found in the Permanently Affordable Housing Program. The first is the Right of First Purchase component, which allows the unit to remain affordable in perpetuity, and requires a homeowner to grant a right of first purchase in the affordable property to the Howard County Housing Commission at the time of resale. The right of first purchase is included in the deed or other instrument and recorded among the Land Records for Howard County. The Covenant component of the program provides, among other things, that the Property shall not be transferred to anyone other than an Eligible Purchaser upon resale or refinance. The Permanently Affordable Housing Covenant is recorded prior to the first mortgage. Similar programs are used in other jurisdictions in Maryland and Virginia; however, affordability time periods vary.

The second component is the First-time Homebuyer Counseling Program, which is provided through a partnership between HCH and Consumer Credit Counseling of Maryland and Delaware. The monthly counseling sessions guide prospective homebuyers on how to manage credit, establish a savings plan, and pay down existing debt in a timely manner to help prepare them for affordable homeownership.

While opportunities to purchase undeveloped parcels continue to be limited, Howard County purchased an 8.06 acre parcel. Approximately three acres of it will be transferred to HCHC and developed into a new Day Resource Center that will serve the needs of Howard County's homeless population. Additionally, the second and third floors of the proposed new building will be comprised of 35 single-efficiency units managed by Volunteers of America Chesapeake. The remaining parcel is owned by Howard County but may be developed into future multifamily housing and potentially have on-site supportive services.

In response to the limited purchase opportunities for undeveloped parcels, the Housing Commission is in the process of identifying redevelopment opportunities throughout the County. They include:

- **Burgess Mill Station II** – HCH is in the process of developing plans for and identifying alternative financing strategies for the construction for the redevelopment of the Ellicott Terrace Apartments and the existing Roger Carter Recreation Center site into 75 mixed-income units.
- **Greenwood Village** – Building upon the successes of the Cottages at Greenwood Phase I, HCH is in the process of planning and financing the construction of 25-30 new energy-efficient, universally- designed, affordably-priced single family detached homes on Jones Road in Jessup, Maryland.
- **Verona at Oakland Mills** – HCH purchased a 251-unit multifamily development of Verona at Oakland Mills in October 2013. Twenty percent of the units will be maintained as affordable and leased to residents at 60% of Howard County's AMI or less.
- **Single Family Housing Rehab Program** - HCH will be administering the Maryland Housing Repair Program (MHRP) to serve single- family owner occupied homeowners with a home repair program. This program will serve residents countywide.
- **Lease Purchase Program** - HCHC will acquire existing residential condominium units in communities in which delinquencies are high and therefore at risk of de-stabilization. HCHC will renovate the units and offer them for rent, with an option to purchase, to households of limited income who could otherwise afford to buy the home except for credit or debt issues. HCHC will manage the properties and provide homeownership and credit counseling to the lease-purchaser until the household is ready to buy, up to three years.

HCH will continue to pursue land acquisition opportunities, as well as acquiring existing communities to further expand its affordable housing portfolio.

HCH continues to allocate funds under its Community Housing Assistance Initiative to provide financial resources for acquisition and rehabilitation of public facilities in addition to rehabilitation and modifications of group homes for individuals with disabilities and rapid re-housing for homeless individuals and families. These efforts are aimed at ensuring long-term availability/accessibility and affordability for specific special needs populations.

Affordable Housing One-Year Goals

The included table details Howard County's one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing with CDBG and HOME funds, as well as the one-year goals for the number of households to be provided affordable housing through activities such as rental assistance, production of new units, rehabilitation and/or acquisition of existing units using funds made available through CDBG and HOME.

While Howard County does not receive ESG and HOPWA funds directly from HUD as an Entitlement community, the County does receive ESG funds through State allocations administered through the Maryland Department of Housing and Community Development (DHCD) and HOPWA funds through Baltimore City respectively. Section V. of this document provides information regarding homelessness and other special needs programs addressed under Howard County's Continuum of Care. In 2014, the HOPWA allocation was \$228,337.00 and 22 households were served.

Grantee Name: Howard County Program Year: FFY11	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	<i>Resources used during the period</i>			
			CDBG	HOME	ESG	HOPWA
<u>BENEFICIARY GOALS</u>						
<u>(Sec. 215 Only)</u>						
Homeless households	28		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	70		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	24		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Total Sec. 215 Beneficiaries*	122		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>RENTAL GOALS</u>						
<u>(Sec. 215 Only)</u>						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	61		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	2		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	22		<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Total Sec. 215 Affordable Rental	85		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>HOME OWNER GOALS</u>						
<u>(Sec. 215 Only)</u>						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units	0		<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		
Homebuyer Assistance	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	0		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)</u>						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	61		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	2		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	22		<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Homebuyer Assistance	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Combined Total Sec. 215 Goals*	85		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)</u>						
Annual Rental Housing Goal	85		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Annual Owner Housing Goal	0		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	85		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

C. Reducing Lead Based Paint Hazards

The data required for this Section is still pending release by Maryland Department of Environment (MDE). It is anticipated that this data will be included in MDE's Annual Report that is scheduled for release in September, 2015. The information below reflects 2013 Lead data that was in the FFY2014 Action Plan.

When the County provides assistance to homebuyers or homeowners and if the houses were constructed prior to 1978, a visual lead-based paint inspection is conducted prior to the settlement on the property and appropriate action taken, if necessary. The following tasks are performed prior to the start of the actual rehabilitation or purchase of the property to ensure the health of residents:

- As part of a loan application the following facts are determined: the date of the dwelling's construction (or at least whether the dwelling was constructed prior to 1978); whether a child under the age of seven is a resident or frequent visitor to the dwelling; and whether the applicant is aware of any lead-based paint hazard and/or flaking or peeling paint on any surface.
- If the dwelling was constructed prior to 1978 and/or any of the other information solicited indicates the possibility of the presence of a lead-based paint hazard, the rehabilitation specialist will make a thorough inspection to determine whether a hazard actually exists or if there is good reason to believe that a hazard exists, and to what extent. On the basis of this inspection, a test by a licensed testing firm may be ordered in order to make a risk assessment. The costs of such a test as well as the cost of abatement or hazard reduction are eligible project costs.
- If test results indicate a significant lead hazard exists, and there are children under the age of seven in the property, it will be recommended that the applicant have the children tested by a health professional to determine if they have an elevated blood lead level.
- Each household applying to the program will be provided with a copy of the most recent edition of the informational pamphlet on lead-based paint published by the U.S. Department of Housing and Urban Development. The applicant must sign a receipt verifying that he/she has been given the pamphlet. This receipt becomes a part of the project file.

- If lead hazard reduction or lead abatement work is to be undertaken as a part of the scope of work, a state certified lead paint abatement contractor must be utilized. Program staff will provide a current list of certified contractors for use by the applicant in obtaining proposals.

HCH informs applicants, voucher holders and landlords participating in the Housing Choice Voucher Program of lead based paint hazards, testing and abatement requirements. All units are inspected, prior to occupancy, according to HUD Housing Quality Standards (HQS). The County's Housing Inspectors also perform inspections for the initial and renewal rental license process. During these inspections, landlords are provided with information regarding their obligations, liabilities and the means of limiting their exposure. Howard County's rental licensing renewal procedure links applications to the Maryland Department of the Environment (MDE) lead paint requirements. This ensures that the MDE is aware of rental housing units with lead paint (built prior to 1950) and the potential for lead-based paint for units build between 1951 and 1978. A house must be re-evaluated for lead-based paint hazards each time its occupants change. An application to the County for a rental license may trigger a need for additional information.

The Howard County Health Department is responsible for monitoring and testing children for elevated blood lead levels. For every instance where a child between the ages of 0 to 72 months tests positively for elevated blood lead levels, case management is provided. Each case is evaluated with home visits and coordinated services including relocation to alternative living. There were 4 cases of blood lead levels that the HCHD monitored in fiscal year 2013.

One 26 month old child, country of origin United States, tested for high lead blood levels but the source was unknown. A 32 month old child, county of origin India, was found to have high lead blood levels caused from spices used from an Indian relative. Similarly, an 18 month old child, whose country of origin is Pakistan, had high lead blood levels, which resulted from cosmetic products. Another case was a 19 month old, whose country of origin is India showed high lead levels with the source identified from spice products from India. All cases are monitored by HUD until the lead levels cleared.

Information on what constitutes a qualified offer is detailed to better to understand the process. It is a legal offer that a landlord may make to a Person at Risk poisoned by lead. When a landlord makes this "offer" he or she will pay for relocation and medical benefits within certain limits. The person receiving a Qualified Offer has 30 days to accept or reject the offer. To be eligible to make a Qualified Offer the Landlord must have:

- 1) Registered the property annually with the Maryland Department of the Environment prior to rental;
- 2) Given the tenant the "Notice of Tenant's Rights" and pamphlet "Protect your Family From Lead In Your Home" as well as a copy of the current inspection certificate for the property; and
- 3) Performed lead hazard reduction called Risk Reduction Treatments in the property and receive an inspection certificate prior to rental or in response to a Notice of Defect.

If a child under six years, or a pregnant woman, has a blood lead level of 20mcg/dL before February 24, 2006, or a blood lead level of 15 mcg/dL or more on or after February 24, 2006, the property owner may make a Qualified Offer. In order for the property owner to make a valid Qualified Offer, the property must be in full compliance with the law.

Maryland Department of the Environment Lead Poisoning Prevention Program: Childhood Lead Registry Blood Lead Testing of Children 0-72 Months in 2013 Howard County						
Population of Children 0 – 72 months	Children Tested¹		Prevalence Cases²		Incidence Cases³	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
0 – 35 months (12,072)	1,712	14.2	13	0.8	3	0.2
36 – 72 months (12,635)	788	6.2	11	1.4	0	0.0
Total (24,707)	2,500	10.1	24	1.0	3	0.1

1. Blood lead reports with missing or wrong date of birth were assumed to be from children less than six (6) year of age with exact age unknown.
2. Any blood lead level >5-9 ug/dL.
3. Any blood level > 10 ug/dl.

Howard County Confirmed Cases by Property Type							
County	Number of Properties	Owner-Occupied		Affected Property		Non-Affected Property	
		Number	Percent	Number	Percent	Number	Percent
Howard	4	1	25%	0	0%	3	75%

The law provides limited liability relief to property owners who meet minimum risk reduction standard through a Qualified Offer. Compensation is capped at \$17,000: up to \$9,500 for relocation benefits and up to \$7,500 for uncovered, medically necessary expenses. The Person at Risk (or parent or guardian) agrees not to sue their Landlord for possible damages caused by lead poisoning if the Qualified Offer is accepted.

The number of units that carry a potential risk is low considering Howard County has a relatively young housing stock. The majority of homes in Howard County were built during the last twenty years, leading to minimal incidences of lead paint hazards in comparison with other Maryland jurisdictions.

As mentioned in previous Action Plans, the Howard County Housing Commission has tested all of its public housing units that were built before 1978. Of the twelve units in this category, only one unit showed the presence of lead in an interior door frame, and this frame was removed in a lead safe procedure and replaced.

D. Develop Institutional Structure

Currently there are no gaps in the institutional structure. Howard County Housing is one of seventeen agencies within Howard County government. The Department Director reports to the County Executive. The Housing and Community Development Board recommends policies for housing and makes recommendations for approval of County Housing and Community Development loan and grant programs and other community development/re-development initiatives. The Board advises the County Executive on housing policy and community development activities. Additional duties of the Housing and Community Development Board include, but are not limited to:

- Providing guidance for the undertaking of feasible community activities designed to achieve the purposes of the Howard County urban renewal law. Recommendations shall be for separate urban renewal projects that can be undertaken independently to achieve identifiable goals and stated public policy.
- Reviewing and making recommendations to the County Executive and the County Council concerning:
 - Urban renewal plans for Howard County, which may include sub-area plans for all areas of the County exhibiting signs of significant decay and/or deterioration.
 - Operating and capital budget to support any approved urban renewal project.
- Reviewing and making recommendations to plan and promote auxiliary social or community service programs for the residents of areas that are economic and/or physical liabilities to Howard County.

The Howard County Housing Commission is a separate legal entity that serves as a Public Housing Authority for the purpose of developing and managing housing resources for low- and moderate-income residents. Highlighted below are some of the duties of the Commission within Howard County.

- In the area of housing development, the Howard County Housing Commission may
 - Prepare, carry out, acquire, own, lease and operate housing developments
 - Prepare for the construction, rehabilitation, improvement, alteration or repair of any housing development or any part of a housing development.
- The Commission may issue bonds in accordance with the provisions of subtitle 5 of the State of Maryland Housing Authorities Law.
- In the area of investigations, the Commission may:
 - Investigate living, dwelling and housing conditions and the possibilities of improving such conditions;
 - Determine the locations of economically depressed or physically deteriorated areas or the areas in which there exists a shortage of decent, safe and sanitary dwelling accommodations for persons of eligible income;
 - Conduct studies and provide recommendations related to: (1) site clearance, planning and redevelopment activities within economically depressed or physically deteriorated areas and (2) the challenges of providing dwelling accommodations for persons of eligible income ; and
 - Engage in research and studies on the subject of housing.

- The Commission may act and invest as a general partner or as a limited partner in various legal/financial entities responsible for the development and maintenance of housing developments.

Howard County Department of Housing and Community Development is responsible for oversight, administration, and distribution of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program funds. The Department of Citizen Services (DCS) provides and funds agencies that offer supportive services for special populations such as frail elderly, the disabled and the homeless. DCS is also responsible for disbursement of funds and oversight of the County's Community Service Partnership Program and the Continuum of Care Programs for the homeless. DCS works closely with local non-profit organizations to ensure the effective delivery of critical human services.

E. Enhance Coordination between Public and Private Housing and Social Service Agencies

Howard County has over 140 human service providers (non-profit, for-profit and government agencies) and community advocates that focus on addressing human service needs within its jurisdiction. Together, these organizations comprise a network known as, The Association of Community Services (ACS). ACS offers information, support, and training; education and community connections to Howard County residents. HCH currently partners with such agencies as (1) DCS to implement a county-funded rental assistance program, (2) Bridges to Housing Stability to provide rental housing opportunities for families in need of housing stabilization services and with (3) HopeWorks in the provision of short-term transitional housing opportunities serving victims and their families, who have experienced domestic violence.

F. Foster Public Housing Improvements and Resident Initiatives

The Howard County Housing Commission currently owns and operates 50 units of public housing. Approximately half of these are scattered sites and the remaining comprise one multifamily community. There are no issues that require the County to provide direct financial assistance to the Housing Commission. Residents are highly encouraged to be involved in the development of their communities and the management of their housing; however, scattered site management prevents many residents from becoming active participants in their community.

On June 24, 2014, the Commission received a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) from HUD's Rental Assistance Demonstration (RAD). The CHAP initiated a process to convert the type of assistance the Commission receives for its Public Housing units.

Specifically, this process will convert all of HCHC's existing Public Housing units to units that are assisted by the project-based voucher program (PBV). HCHC anticipates this process to be completed approximately one year after the issuance of the CHAP.

HCH continues to work with Public Housing residents to determine who may be eligible to pursue homeownership and is currently working with residents who are interested in the Housing Choice Voucher/Home Ownership Program. The Housing Opportunities Division of HCH works closely with these residents on a one-on-one basis through the Family Self Sufficiency Program (FSS), which currently has six (6) residents enrolled. The residents of the FSS Program are positioning themselves to participate in the Home Ownership Voucher Program (based on credit, savings and income). At this time staff is currently pursuing new lending partners to participate in the Home Ownership Program and assist the residents of the Housing Choice Voucher program.

G. Anti-Poverty Strategy

Howard County is implementing its anti-poverty strategy primarily through the Community Action Council which is the County's designated anti-poverty organization, the Plan to End Homelessness, the Department of Social Services, and its Community Based Development Organization.

1. Community Action Council (CAC)

The Community Action Council of Howard County, organized under the Economic Opportunity Act in 1964 as part of the War on Poverty initiative is a private, non-profit organization designated as Howard County's anti-poverty agency. The mission of the CAC is to provide programs and services to low-income residents of Howard County in order to alleviate the effects of poverty; to promote self-sufficiency as a means of interrupting the cycle of poverty; and to stimulate increased awareness of, and responsiveness to, the needs of the low income population as part of the larger community.

CAC provides services from seven locations that are strategically placed within the county to meet the needs of the most vulnerable families. With a median household income of \$107,821, Howard County is one of the wealthiest in the nation. Behind the apparent wealth however, there is another less prominent group; 13,487 Howard County residents (4.5 percent) who live at or below poverty. At the same time, 20 percent of the population struggles to make ends meet even though their household income is above poverty guidelines. Each year, CAC supports more than 30,000 low-income individuals and families by providing case management and internal and external referrals to programs that enhance family self-sufficiency.

CAC delivers many programs and services that address the challenges faced by low-income families. The programs include but, are not limited to, Head Start and Pre-K, which are comprehensive early childhood education and development programs provided to economically disadvantaged children, ages 3 and 4, and to their families. Other programs provided by CAC include:

- Homeless prevention programs such as Eviction Prevention and Rental assistance
- Food Assistance complimented by Nutrition and Health Education programming
- Energy and Water Assistance
- Weatherization Services
- Summer Youth Employment
- Financial Literacy program along with 2- to -1 savings match asset-building program

In many cases, the services are bundled in order to enhance the effectiveness and impact of the support. The table below depicts the type of services and number of families/individuals CAC supported in FY 2014.

Food/Shelter – The Food Bank provides supplemental food to low income residents.	23,318
Crisis Intervention – Provides utility (both electric and heating) services, eviction prevention, first month’s rent, and one month’s rent to those who meet the eligibility criteria.	10,143 utility resolutions 343 Housing 81 Other
Restored Effort: Family Preservation funding now retitled to CSHS funds for eviction prevention.	66

Speech and Language Services (Health) Assess developmental need and deliver appropriate therapy	296
Opportunity /Stability Expansion of the hours of service in Head Start.	36 Children and their families
Summer Youth Employment	15
Weatherization	239
Received and responded to approximately 10,000 information and referral calls from Howard County citizens regarding CAC and other Human Service organization programs.	

CAC serves on the Board to Promote Self-Sufficiency, Local Children’s Board, Maryland Community Action Partnership, Maryland Head Start Association, the Judy Center Advisory Board, Howard County Public School’s Homeless Coalition Advisory Board, Early Childhood Transition Committee, Early Childhood and Child Care Coalition, Maryland State Department of Education Advisory to Accreditation, Center for Social and Emotional Foundations for Early Learning, and the Howard County Public School Homeless Committee.

The Community Action Council of Howard County is accredited by:

- *National Association of Education for Young Children*
- *Maryland State Department of Education*
- *Howard County Child Care Licensing, and the*
- *Better Business Bureau*
- *Healthy Families Healthy Childcare Provider*

The Community Action Council was selected as one of the Top 100 Employers in Maryland in 2014.

In FY 2014, CAC underwent a comprehensive organizational assessment process. The framework for the assessment was based on the Maryland Association of Nonprofit Organizations’ Standard of Excellence eight focus areas: 1) Board Governance; 2) Program Quality; 3) Leadership and Structure; 4) Financial Management; 5) Human Resource Management; 6) Financial Sustainability; 7) Technology; and 8) Communication.

The assessment concluded that CAC is a healthy organization staffed by dedicated employees and a dynamic Board of Directors. The report further concluded that CAC appears to meet all the criteria for Tier One and Two of the Standards for Excellence.

2. Plan to End Homelessness

In 2009, the Howard County Board to Promote Self-Sufficiency charged its Committee to End Homelessness (CEH) with developing a Howard County Plan to End Homelessness (the Plan). The CEH mobilized more than 50 committed participants from human service agencies, local government and the community, forming task groups to study the situation in Howard County and best practices for ending homelessness that have been successful in other communities.

In November 2010, the CEH issued the Howard County's Plan to End Homelessness which outlined current efforts to address the problem of homelessness and focused on two principal methods of ending homelessness with Prevention and Housing First best practices. The Plan offers strategies to deal with the two main categories of homelessness which are chronic and situational homelessness; addresses support services, such as emergency medical care and public safety, and called for the CEH to continue to develop more detailed financial projections. Finally, the Plan provides a process to monitor implementation of the strategies.

The Committee's policy statements were adopted by the Association of Community Services. In addition, the Committee was asked by the Governor's Office to work with their efforts to End Childhood Hunger in Maryland. By addressing homelessness in the County, poverty is also alleviated. Since the original formation of the Plan to End Homelessness, the Committee to End Homelessness (CEH) disbanded, as the Coordinated System of Homeless Services began forming community partnerships around the PEH activities, in response to HUD's directive to implement a coordinated assessment system.

Since then, the CoC Lead Agency has been coordinating activities outlined in the PEH to further the stated goals and meet HUD's directives. Additionally, the Lead Agency formed a CoC Steering Group to elicit community feedback and generate discussion related to the activities that are funded through the PEH, and the Continuum.

The County's Plan to End Homelessness is in the process of being updated, to be completed by end of local fiscal year 2015. The update will elicit community feedback and workgroups to build upon the strategies to carry out existing Plan activities, through the CoC Steering Group. The primary strategies will continue to be homelessness prevention and Housing First best

practices. Other initiatives to be implemented will continue to incorporate: strengthening mainstream services, health care, and helping the homeless obtain income to be self-sufficient.

3. Department of Social Services

The Department of Social Services (DSS) continues to play a vital role in providing assistance to low-income households and addressing poverty. For those who qualify, DSS provides food stamps, administers the medical assistance program, and provides job search assistance, including resume preparation, job banks and interviewing practice and transportation while on the job search. Job training is offered through the state Employment and Training Office. A limited number of Purchase of Care vouchers are also available for currently enrolled Department of Social Services (DSS) customers to assist with childcare expenses. Through its programs, DSS helps families become stable and improve their economic situations.

4. Community Based Development Organization (CBDO)

Howard County did not qualify or re-qualify any applicants as a CBDO in FFY14, nor were there any applications for funding received from entities seeking designation as a CBDO

H. Affirmatively Furthering Fair Housing (AFFH): Local & Regional Efforts

HCH continues its local and regional AFFH activities. More specifically, HCH and the Regional Fair Housing Group (RFHG), Housing Policy Coordinator (HPC) presented first to the Howard County Council's attorney on March 28, 2014 and then the Council on May 12, 2014, with the support of the Directors from Baltimore Neighborhoods, Inc., and Citizens Planning and Housing Association, Inc., about Howard County's AFFH requirements as an entitlement jurisdiction. HCH and the RFHG were also successful in getting key County personnel and community stakeholders to attend fair housing training, "Keeping Your Jurisdiction on the Right Side of the Fair Housing Act" which was held on May 20, 2014. Other steps HCH has taken to remove impediments to fair housing include:

- Continuing to reach out to the foreign-born community through translated advertising and media, and working to develop relationships with service providers that

routinely serve this community, in order to gain access to educate them about fair housing and housing opportunities;

- Working with the County Executive's Office to conduct board surveys in order to ensure member diversity;
- Providing funding for randomly conducted fair housing testing;
- Working with the service community to expand affordable housing opportunities to both homeless and low-income families through the creation of both hard units and rental assistance programs;
- Working with the regional public housing authorities, through the RFHG and the Opportunity Collaborative to create regional housing opportunities, including streamlined portability processes;
- Successfully passing legislation to expand the Moderate Income Housing Unit (MIHU) Program to include both rental and homeownership Low-Income Housing Units; and Successfully passing legislation that expands MIHU requirement throughout the County;
- Working with the County Council to pass legislation that establishes a local low-income saturation standard to prevent the concentration of low-income housing opportunities in specific areas;
- Working with DCS to implement the Coordinated System of Homeless Services to ensure that resources dedicated to the eradication of homelessness are used effectively;
- Working with the Community Planning and Grants Management Division to identify the location of units created with grant funds in order to strategize the location of new housing opportunities.
- Contracting with Consumer Credit Counseling Services of MD and DE, Inc., a

HUD certified counseling agency, to assume the responsibility for delivering a monthly homebuyer education class, co-facilitate the quarterly MIHU Renters and Buyers Workshop, and to perform housing counseling as needed;

- Expanding the Settlement Downpayment Loan Program to persons purchasing a home in Howard County but not through an HCH program, and allowing them to use a lender of their choice as long as the lender has participated in HCH's SDLP training;
- Working with the MD Department of Housing and Community Development to offer a Home Repair Program to preserve affordable homeownership;
- Working to expand affordable homeownership opportunities through the Lease Purchase and Housing Rehabilitation Programs. Both are pending implementation; and
- Actively participating in the Consider the Person Campaign (CTP) Committee, a group led by the Community Development Network of MD and comprised by members of the RFHG and the Opportunity Collaborative. The CTP was a media campaign focused on changing the hearts and minds of the regional community (e.g., property owners and managers, community members and power brokers) toward housing choice voucher holders. The Committee hired a media consultant that moved the campaign from conception to implementation, including, logos, colors, language, photos, interviews, a website (<http://considertheperson.org/>), promotional materials and media coverage - television interviews as well as feature articles.

HCH continues to be an active member of the Baltimore Regional Fair Housing Group (RFHG), a five member contiguous, regional body comprised of Baltimore City, Anne Arundel, Baltimore, Harford and Howard counties. The RFHG was voluntarily formed with a memorandum of understanding, to address the potential impediments to fair housing choice that cross jurisdiction lines. The RFHG continues to partially fund the HPC position seated at the Baltimore Metropolitan Council (BMC) that spearheads and documents the collective efforts of the RFHG. The RFHG was awarded a Fair Housing Initiative Program (FHIP) Grant by U.S. the Department

of Housing and Urban Development (HUD) to fund regional education and outreach, with the target audience being local elected officials, real estate professionals and community management organizations. The FHIP grant can also be used to create educational materials and the RFHG has created fair housing guides for both rental and owner occupied homes. The books are available in English, Spanish and Korean, are actively being distributed throughout the region and can be accessed on line.

The RFHG has also continued its participation in the Opportunity Collaborative for the purpose of achieving the goals (which aligns with the Analysis of Impediment in many areas) of the Sustainable Communities Initiative Grant: to develop a Regional Plan for Sustainable Development (RPSD) that links housing, transportation and workforce development, including a Fair Housing Equity Assessment. This goal has been achieved. On the way to achieving this goal the RFHG participated in the Opportunity Collaborative Summit on September 6, 2014, which introduced a draft of the RPSD to the regional community and solicited feedback prior to finalization. Another outcome of the work of the Opportunity Collaborative was the creation of the Opportunity Fellows Program, designed to educate a variety of community members about the RPSD and how to use the document to advocate for community needs for the next ten years.

The goal of the RPSD is to promote equitable access to opportunity throughout the region: transportation that connects families to affordable housing, quality community amenities and access to jobs.

The RFHG also actively participates in the SCI, having members from the County on all of the committees – Housing, Nexus, Transportation and Workforce Development - drive the development of the RPSD. For more information about the Opportunity Collaborative visit <http://www.baltometro.org/about-bmc/news-and-press-releases/bmc-awarded-3-5m-hud-grant> . The work of the SCI aligns well with both local and regional AI goals and tasks.

Listed below are the County's ten potential impediments to fair housing choice and the proposed actions to overcome the impediments. These observations and HCH's Fair Housing Action Plan will guide activities to educate, empower and better serve the residents of the jurisdiction.

i. Public Sector – Administrative

Impediment A. The County’s increasingly diverse minority population calls for continued language accommodations to ensure that all residents can access programs and services.

The increased number of native-speaking Spanish, Korean, and Chinese persons could potentially result in an increasing number of persons who will require translation services in order to access federal programs administered by the County.

Proposed Action I: The County should continue to monitor the language needs of its expanding population, providing the accommodations and services detailed in its Limited English Proficiency Plan, effective September 2007.

Proposed Action II: The County should continue to provide access to written translations via a qualified service provider such as Language Line.

Impediment B. Members of the protected classes could be more fully represented on County boards and commissions dealing with housing issues.

Women, racial minorities and other members of protected classes are represented on the many housing-related boards and commissions Howard County maintains as an opportunity for citizen engagement. However, Hispanic persons and persons with disabilities are represented at rates below their overall population presence in the County. The experiences and perspectives of individuals in these categories would enhance the decision-making process in Howard County and offer the opportunity for advancing fair housing choice in all aspects of County government.

Proposed Action: Conduct a survey of each of the appointed citizens who are currently members of public boards to identify members of the protected classes. The survey should identify the race, gender, ethnicity and disability status of every board and commission member. Thereafter, each new appointment should be surveyed in a similar manner. Records on the membership of boards and commissions will assist County officials in making appointments that are representative of the County’s diversity.

Impediment C. Howard County’s activities to affirmatively further fair housing have been well documented, but could be strengthened.

The County has many programs and initiatives in place to address previously identified impediments to fair housing choice. In addition to these policies and programs, the County should be conducting frequent and empirical evaluations of the fair housing landscape (i.e. housing market patterns, discrimination complaints data, number of family units developed outside of impacted areas, number of Section 8 households who choose to live outside of impacted areas, etc.). The fair housing environment has been improved by the County’s various outreach and education efforts. However, true progress can be made and measured in expanding enforcement activities while incorporating new policy development initiatives and activities aimed at expanding fair housing choice.

Proposed Action I: Contract with a qualified agency to perform fair housing discrimination testing in Howard County.

Proposed Action II: In evaluating the effectiveness of activities designed to affirmatively further fair housing, the County should rely upon empirical data describing the number of affordable housing opportunities created for members of the protected classes, especially located in non-impacted areas.

ii. Public Sector – Programmatic

Impediment A. Minority households have greater difficulty becoming home owners in Howard County because of lower incomes.

The home ownership rate among Hispanic households was 55.2% in 2000, compared to 78.2% of White households. Among Black households, 57% owned their homes. Among the minority population in Howard County, Asian households had the highest rate of homeownership at 66.8%.

Proposed Action I: Continue to strengthen partnerships with local lenders that will offer homebuyer incentives to purchase homes in the County.

Proposed Action II: The County should continue to work collaboratively with fair housing advocates, certified housing counselors and financial lenders to increase equal opportunities for home ownership among members of the protected classes. Such methods may include:

- Increasing sustainable home ownership opportunities through financial literacy education including credit counseling and pre and post-home purchase education.
- Increasing lending, credit, and banking services in low-moderate income census tracts and minority census tracts.
- Increasing marketing and outreach efforts of affordable mortgage products that are targeted for residents of low to moderate income census tracts, low-moderate income residents, and minorities.

Impediment B. Howard County has advanced policy initiatives to expand the housing options affordable to households making up to 80% of the area median income, but the number of households in need of affordable housing continues to grow.

The magnitude of the loss of affordable units and the market competitiveness heightened by increased demand effectively restrict housing choice for minority households, which have significantly lower incomes than White households. These trends are apparent in the following observations:

- Howard County has experienced significant growth rates between 1980 and 2008. Such growth has resulted in a continuous demand for housing units to accommodate the increasing population.

- Multifamily housing in Howard County, both market rate and subsidized units, is concentrated in and around Columbia. However, the once-dominant market emphasis on single-family detached homes has given way to significant growth in townhomes and apartments during the last 10 to 15 years, a trend that is expected to continue.
- Minority households were more likely to live in larger families than White households. For example, 80.2% of Hispanic families and 75.8% of Asian/Pacific Islander families included three or more persons, compared to 63.9% of White families. However, only 6.7% of the rental housing stock in Howard County contains three or more bedrooms, compared to 65.2% of the owner housing stock.
- The median housing value in Howard County increased 63% between 1990 and 2008, while real household income grew only 8.7%.
- Howard County represents an increasingly expensive rental housing market. Between 2000 and 2008, the number of units renting for less than \$500/month declined by more than 700, a decrease of 38.4%, while units renting for \$1,000/month or more nearly tripled during the same period.
- Due to a growing job market and the relocation of jobs to Fort Meade, there is an increasing demand for more affordable housing for working class households throughout the County.
- Minimum wage earners and single-wage earning households cannot afford a housing unit renting for the HUD fair market rent in Howard County. This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units from unscrupulous landlords. Minorities and female-headed households will be disproportionately impacted because of their lower incomes.
- Persons receiving a monthly SSI check of \$674 as their sole source of income, including persons with disabilities, cannot afford a one-bedroom unit renting at the fair market rent of \$868.
- The County operates the Moderate Income Housing Unit (MIHU) Program, which is an inclusionary zoning program that requires developers of new housing in specific zoning districts to sell or rent a portion (generally 10-15%) of the dwelling units to households of moderate income. While this program has been successful, few developers are willing to target households making below 50% of MHI.

Proposed Action I: Continue to impose affordable unit set-asides through the commendably progressive MIHU program. Explore the feasibility of increasing the percentage of units to be set aside for moderate income households.

Proposed Action II: Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families. Provide tax abatements and financial assistance to affordable housing projects located outside of impacted areas.

Proposed Action III: Partner with regional affordable housing developers to increase the supply of affordable housing throughout the County. Provide land, extend financial assistance, and reduce fees and regulatory requirements that impede the development of affordable rental housing for families in areas outside of impacted areas.

Impediment C. The majority of fair housing complaints filed through HUD in Howard County involved race as the basis for discrimination. Disability was the second most common basis.

While over 65 percent of the complaints filed through HUD in the County were found to be without probable cause, the predominance of complaints on the basis of race and disability is evidence that education, information and referral regarding fair housing issues for persons with disabilities are increasingly critical. As of the AI's writing, there were eleven open housing cases at OHR. From the time that the last AI was completed in September of 1996 through March 11, 2010, there have been 1,144 cases filed with OHR, of which 162 cases (14 percent) involved housing.

Because the Maryland Commission on Human Relations withholds detailed information about the housing discrimination complaints it receives, entitlement communities and fair housing advocates have one less resource upon which to base testing, education, and outreach efforts. Local testing efforts are increasingly important to ensure that education and outreach efforts are focused on the most critical needs in the County. The County does not engage in routine paired testing for housing discrimination. By establishing a qualified organization to conduct discrimination testing, the County could more effectively focus its education and outreach efforts on the members of the population that are experiencing discrimination in housing practices.

Proposed Action I: Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents, and Realtors.

Proposed Action II: Continue to investigate complaints in accordance with the County Human Rights Law.

Proposed Action III: Establish a contract with a qualified agency to perform fair housing discrimination testing in Howard County for sales housing, rental housing, and mortgage lending.

Impediment D. The housing-related policies in the 2000 General Plan could be expanded to address affordable housing needs for all household types.

Howard County's General Plan lacks an over-arching policy that reflects the County's commitment to affirmatively further fair housing (AFFH). Without a written policy and action directives, it is difficult for the County's AFFH commitment to be reflected in County policies, programs and practices. Also, the County's General Plan is silent on the need to diffuse the concentration of lower income households, members of the protected classes, and affordable housing resources in Columbia and its environs. Absent a strategy to diffuse racial, ethnic, and economic concentrations, Columbia may become overly impacted. Finally, the Plan places

emphasis on congregate care senior developments and the lower-priced sales housing market as the key to meeting the County's affordable housing needs. However, the County has not defined a specific strategy to address the need for fixed units of affordable rental housing for lower income families (including members of the protected classes) currently living in or expected to reside in Howard County. The General Plan is now more than ten years old. The process to update the plan has been completed and in the 2012 Legislative Session, the County Council approved PlanHoward 2030 as the General Plan for Howard County.

Proposed Action I: Update the County's General Plan to include a stated policy that reflects the County's commitment to affirmatively further fair housing. Take steps to ensure that the County's programs and practices reflect this policy and that County staff members in each department are trained in the aspects of fair housing that relate to their work.

Proposed Action II: Continually monitor racial and ethnic concentrations and concentrations of lower income persons in Columbia. Invest entitlement funds in both the revitalization of this community's older neighborhoods and in the creation of affordable housing opportunities in non-concentrated areas of the County.

Proposed Action III: Define a strategy to address the need for fixed units of affordable rental housing for families in non-concentrated areas of the County. In light of the limited federal entitlement resources at the County's disposal, such a strategy might include facilitating or incentivizing the construction of affordable family rental units by private or nonprofit developers.

Impediment E. Several of the County's reporting and administrative documents and policies related to its federal entitlement programs should be improved to be more comprehensive and more consistent with HUD regulations involving affirmatively furthering fair housing.

To meet its fair housing goals, the County must be specific in its investing objectives and state the number of affordable housing units (both rental and sales) to be created outside of impacted areas. Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. Site selection for HOME-assisted rehabilitated units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. For new construction, an additional standard is added. With few exceptions, site selection must include a location that is not in an area of minority concentration.

Proposed Action I: Create maps that show the geographic distribution of affordable housing developments in the County financed through the use of CDBG, HOME or other public funds and insert these maps into the County's annual CAPERs.

Proposed Action II: Prepare a written policy that encompasses these standards and that can be incorporated as part of the application review and approval process for all applicable HOME-assisted projects.

Impediment F. The Housing Choice Voucher (HCV) Program could be improved to provide greater housing choice to the County’s lower income and minority populations.

Based on stakeholder interviews conducted during the preparation of this analysis, the following comments were noted:

- There is resistance on the part of some landlords in Howard County to rent to voucher holders. Allegedly, certain landlords impose higher standards on voucher holders than non-voucher holders, including charging higher-than-normal security deposits and requiring pristine credit references.
- Howard County’s HCV program utilizes a fixed payment standard that some advocates argue is insufficient to afford the market rent in upper-income areas of the County. The payment standard is adequate to afford rent at many locations in Columbia, advocates said, but in other areas of the County (e.g., Laurel); the payment standard is too low. Laurel is an excellent community for voucher holders due to access to transportation and jobs. Because the total amount of voucher funds available to the County is limited, increasing payment standards in some cases will mean less available resources to assist the greatest possible number of families. This concern must be balanced with an aim to expand housing choice to the extent reasonable.
- A certain degree of disharmony exists relative to the law in Howard County that permits landlords to deny voucher holders once a certain percentage of their units are occupied by voucher holders. Some landlords interpret the percentage as a minimum percentage while other landlords interpret it as a maximum percentage. From the observations previously mentioned, more educational outreach is needed to area landlords and property management companies that accept housing choice vouchers. In addition, Howard County should conduct discrimination testing that targets rental housing.

Proposed Action I: Work with area landlords and property management companies, in conjunction with the Howard County Housing Commission, to encourage their acceptance of vouchers in non-impacted neighborhoods of the County.

Proposed Action II: Continue to educate landlords and voucher holders on their rights and responsibilities, particularly related to source of income discrimination, under the Howard County Human Rights Law.

Proposed Action III: Facilitate fair housing training for HCV staff members.

iii. Private Sector

Impediment A. Mortgage loan denials and high-cost lending disproportionately affect minority applicants in Howard County, similar to national trends.

Minorities, both lower-income and upper-income households, were denied home mortgages at higher rates than White households. These patterns are consistent with discrimination. Most notably, upper-income Black households had the same denial rate of about 14 percent as lower income White households. Additionally, minorities are over-represented in high-cost mortgage loans. In 2008, the rate of high-cost lending was higher for upper income Black and Hispanic households than that of White households. Recent trends in mortgage denial rates and high-cost loans among Black and Hispanic households in Howard County warrant further review as these trends are consistent with discrimination.

Proposed Action I: Continue to engage HUD-certified counselors to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis.

Proposed Action II: Continue to facilitate home ownership workshops and training sessions, with special outreach in impacted neighborhoods, and to engage members of the protected classes.

In response to the above, Howard County has developed and is currently implementing a variety of strategies under its Fair Housing Action Plan (FHAP) for the local AI. The FHAP details the proposed goals and tasks toward goal achievement as the jurisdictions work to affirmatively further fair housing over a four year period. HCH is the jurisdiction's entitlement parliamentarian, the AI custodian, the FHAP project manager and therefore responsible for initiating compliance activity and documenting FHAP progress in the annual CAPER. (Please see Appendix A of this document to view the Howard County FHAP.)

VII. Monitoring

Howard County's Department of Housing and Community Development is the administering agency for both the CDBG and HOME programs. The department is responsible for ensuring that each Subrecipient, Development Partner, CHDO, CBDO and other program/project sponsors achieve and maintain full compliance with applicable program and administrative requirements. The Goals outlined in the Consolidated Plan are achieved by the on-going work effort of Howard County's subrecipients, CHDO's and other partners. Howard County Housing regularly monitors a program or activity's progress in relation to the Con Plan by requiring that sufficient documentation exists for each funded activity both at the project level and beneficiary level.

The Department has developed strategies that are used to keep projects/activities moving towards completion and utilize alternative options such as reprogramming of funds in order to maintain an acceptable rate of overall grant funds expenditure. Howard County recently changed its Annual monitoring schedule for CDBG from October of the following Program Year, to February of the current Program Year. This allows for the provision of technical assistance from Howard County to ensure that any unexpected circumstances, delays or other implementation challenges can be addressed and corrected while the program/activity is still underway to ensure that project/activity goals are met and compliance is maintained.

The HOME Program monitoring along with the monitoring of affordable housing development projects, homebuyer and CHDO activities has been changed from January of the Current Program Year, to the end of the Program Year. The Department focuses its monitoring efforts on a variety of program elements including eligibility of costs, property types/standards, beneficiary income eligibility as well overall affordability.

Specific to the HOME Program, the Department's HOME Program Specialist, the Grants Administrator and Project Managers have shared responsibility for monitoring projects and activities during various stages of project implementation. Post project completion, the HOME Program Specialist and the Grants Administrator coordinate and carry out the long-term monitoring functions as applicable for each project.

IX. HOME and American Dream Downpayment Initiative

Howard County anticipates it will be receiving \$310,681.00 in Home Investment Partnerships Program (HOME) funds for Federal FFY2015.

HOME Program Design

The County's HOME program is designed to serve income-eligible families living or working in Howard County. Households with children (including families exiting homelessness that have been in a shelter or transitional housing) may be given preference. Following HUD's guidelines on the need to promote homeownership emphasizing increasing minority groups as

new homebuyers, the County will continue its partnership with the Howard County Housing Commission in the development of both rental and homeownership affordable housing opportunities. In FFY 2015, the County will allocate up to 2.5 percent of its HOME allocation to support a Community Housing Development Organization (CHDO) with operating expenses.

ADDI

All ADDI funds were expended in prior program years.

A. Recapture Guidelines

The County (in order to ensure affordability) is required by the HOME program to impose either resale or recapture requirements, at its option. In following the Consolidated Plan, Howard County is currently using the recapture provision. Recapture provides a mechanism to recapture all, or a portion, of the direct HOME subsidy from the net proceeds when the property is sold. If the HOME recipient decides to sell the house within the affordability period the homebuyer can resell the property to any willing buyer, but the sale during the affordability period triggers the repayment of the direct HOME subsidy. The recapture provision will be outlined in a Note and a Deed of Trust recorded within the land records of Howard County. The loan may either be deferred or amortized at a 0-5% interest rate depending on income and the need to keep the unit affordable to the homebuyer. The County may from time to time review its cost of funds and adjust the interest rates accordingly, prior to executing new loan agreements. If the net proceeds of the sale are insufficient to pay the HOME investment, the County may ***only*** recapture an amount less than or equal to the net proceeds.

As Howard County property values continue to be high, the greatest challenge is to increase homeownership opportunities for low- and moderate-income households and then retain the properties as affordable units once the units are resold. The department emphasizes ongoing evaluation of County programs, including the Shared Equity Program and the recapture provision under the HOME Program to ensure that housing units remain affordable after the initial homeowner sells the property. HCH will evaluate the feasibility of modifying its Consolidated Plan to use the resale provision under the HOME Program. This would require the development of a very well-defined program design for the resale provision to ensure that the HOME requirements under this provision can be met.

B. Value Limits

The FFY15 Value Limits were published on March 13, 2015. The information contained in this narrative reflects FFY2015 Value Limits. Per the new HOME rule, jurisdictions must have new construction and existing housing value limits. For Howard County, excluding Columbia, for existing housing, the County will use \$380,000.00 for a one-unit modest home; \$486,000.00 for a two unit structure; \$589,000.00 for a three unit structure; and \$730,000.00 for a four unit structure. For new construction, the County will use the same financial criteria.

C. Planned Use of ADDI and Targeted Outreach

There are no remaining ADDI funds to be used in FFY2015.

D. ADDI Actions Taken to Ensure Suitability of Families

Howard County Housing is a certified counseling agency recognized by the State of Maryland. The Department has several staff to work with clients to ensure suitability for homeownership. These include a Chief of Housing Opportunities, Senior Homeownership Specialist, and a Family Self-Sufficiency Coordinator.

The Division of Housing Opportunities staff work closely with clients to ensure that they can afford to purchase a home and still have a manageable budget. Review of client credit worthiness is an important first step in determining if the client is suitable for homeownership. Area lenders, in partnership with the homeownership team, ensure that all required criteria are met when processing loans. One of the goals of the Family Self-Sufficiency Program (FSS) is to assist clients in improving their credit and reducing debt prior to homeownership.

A monthly home-ownership counseling course is offered to all interested persons. This is also a requirement for all persons receiving homeownership assistance from any State or County program. The curriculum for the course is taken from *A Guide to Homeownership* by Fannie Mae. Topics include, but are not limited to:

- Preparing for Homeownership
- Obtaining a Mortgage
- Shopping for a Home

- Closing
- Credit Repair
- Life as a Homeowner

The course addresses the preparation needed prior to purchasing a home and provides guidance regarding the responsibilities of the homeowner. The importance of (1) meeting obligations as a borrower, (2) maintaining home, (3) budgeting for a household, and (4) reaping the financial benefits of homeownership, are highlighted within as well.

E. HOME Tenant Based Rental Assistance

Howard County does not use any of its HOME funds for Tenant Based Rental Assistance.

F. Federal Program Match Requirements

In accordance with Federal program requirements, a local match is required for the HOME Program. The match requirement for the HOME Program is 25 percent of the entitlement funding amount, less administrative funds. This match must come from non-federal sources. For the program year beginning July 1, 2014, Howard County's estimated match obligation will be \$58,252.69. In general, the anticipated source of matching contributions are from the County's Settlement Down Payment Loan Program (SDLP), donations and other sources. Properties acquired below market values, negotiations of fees and tax abatements, infrastructure improvements for HOME-assisted and HOME-eligible projects and donations are also eligible sources of match funding, and the County is researching land acquisition related to HOME projects as a possible match funding source.

G. Leveraging Private and Non-Federal Funds

See page 7 of this plan for details.

H. CDBG Benefit to Low-mod Income Persons

Howard County intends to utilize 100 percent of its CDBG entitlement funds to principally benefit low-mod income persons.



CDBG Program Federal Fiscal Year 2015 Use of Funds

Entitlement for FFY2015	\$1,005,824.00
Estimated Program Income For FFY2015.....	\$11,858.13
Program Income Received for FFY2014.....	\$11,858.13
Entitlement + Estimated Program Income.....	\$1,017,682.13
Public Service Cap = 15% of Entitlement + PI Received for FFY2014.....	\$152,652.32
Administration & Planning Cap = 20% of Entitlement Including PI for FFY2015.....	\$203,536.43

Action Plan Project Descriptions

Administration and Planning

	FFY 2015 Funding Amount
Program Administration.....	\$160,000.00
Total Planning & Administration.....	\$160,000.00

Public Facilities

CAC / Food Bank Acquisition.....	\$250,000.00
Roger Carter Recreation Center Re-development*.....	\$200,000.00
Day Resource Center.....	\$225,000.00
Emergency Public Facilities.....	\$24,000.00
Total Public Facilities	\$699,000.00

Housing Activities

HEH / Affordable Homes for the Homeless.....	\$50,000.00
Total Housing Programs.....	\$50,000.00

Public Services

Grassroots / Route One Day Resource Center	\$46,681.00
Hope Works / Emergency Shelter - Transitional Housing.....	\$23,621.13
CAC / Homelessness Prevention.....	\$38,380.00
Total Public Services.....	\$108,682.13

Total **\$1,017,682.13**

Maximum Public Service Cap @ 15% =	\$152,652.32
Public Service Funding =	\$108,682.13
Maximum Administration and Planning Cap @ 20% =	\$203,536.43
Administration and Planning Funding =	\$160,000.00
Net Entitlement + PI Estimated.....	\$1,017,682.13
Total of All Activities	\$1,017,682.13

Notes

* Multi-year Commitment



**HOME Program Federal Fiscal Year 2015
Use of Funds**

Entitlement for FFY2015	\$310,681.00
Match.....	\$58,252.69
Estimated Program Income.....	\$0.00
Entitlement + Match + Program Income.....	\$368,933.69
Program Administration = 10% of Entitlement (a).....	\$31,068.10

Action Plan Project Descriptions	FFY 2015			
	Home Entitlement	Match ^(b)	Program Income	Total
Home Administration.....	\$31,068.10			\$31,068.10
CHDO set-aside (b).....	\$46,602.15			\$46,602.15
Housing Initiative Program (Ellicott Terrace Redevelopment).....	\$233,010.75			\$233,010.75
Match from County SDLP, donations and other sources (c).....		\$58,252.69		\$58,252.69
Totals	\$310,681.00	\$58,252.69		\$368,933.69

Notes

(a) Housing will use 10% of the Entitlement + Program Income for Program Administration.

(b) Required 15% CHDO Set-aside

(c) Required Match Obligation @ 25% of (Entitlement, less administrative cost, less CHDO set-aside)

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 5. Resource Management - Foster intragovernmental and public/private partnerships that promote effective and efficient use of tangible resources such as goods and equipment, financial and labor resources.		
Project Title	<u>CDBG Program Administration</u>		
Project Description:	Provide for the administration and management of the Howard County Community Development Block Grant Program. This does not require an objective or outcome category.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: 6751 Columbia Gateway Drive, Columbia, MD 21046	
Objective Number: N/A	Project ID: 001
HUD Matrix Code: 21A	CDBG Citation: 570.206
Type of Recipient: Public 570.500(c)	CDBG National Objective: N/A
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: N/A	Annual Units: N/A
Local ID: 15CDBG-DHCPA	Units Upon Completion: N/A

Funding Sources:	
CDBG	\$160,000.00
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$160,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 4. Community Sustainability – To plan, design and support local regional projects and initiatives that incorporate such elements as: green technology, pollution prevention technology, community-based amenities and services, environmental restoration, and long-term, resource-rich public and private partnerships that can persist across generations.		
Project Title	<u>Food Bank Acquisition</u>		
Project Description:	Howard County will provide funding to the Community Action Council of Howard County to support the acquisition of a Food Bank which will serve low to moderate income individuals and families in Howard County.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: Community Wide Burgess Mill Way Ellicott City, MD 21043	
Objective Number: SL-1	Project ID: 002
HUD Matrix Code: 05W	CDBG Citation: 570.201(e)
Type of Recipient: CBDO 570.500(c)	CDBG National Objective: LMC 570.208(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: People	Annual Units: 500
Local ID: 15CDBG-CACFB	Units Upon Completion: 500

Funding Sources:	
CDBG	\$250,000.00
ESG
HOME	
HOPWA	
Total Formula
Prior Year Funds
Assisted Housing
PHA	
Other Funding	
Total	\$250,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 4. Community Sustainability – To plan, design and support local regional projects and initiatives that incorporate such elements as: green technology, pollution prevention technology, community-based amenities and services, environmental restoration, and long-term, resource-rich public and private partnerships that can persist across generations.		
Project Title	<u>Roger Carter Recreation Center Redevelopment</u>		
Project Description:	The amount reflects the annual CDBG investment under an approved Pre-award strategy for this project. This activity will benefit the residents Burgess Mill Station and surrounding Ellicott City Community in Howard County located on Burgess Mill Way, Ellicott City, MD 21043.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: Community Wide Burgess Mill Way Ellicott City, MD 21043	
Objective Number: SL-1	Project ID: 003
HUD Matrix Code: 05L	CDBG Citation: 570.204(a)(2)
Type of Recipient: CBDO 570.204	CDBG National Objective: LMC 570.208(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: People	Annual Units: 500
Local ID: 15CDBG-HCCCR	Units Upon Completion: 500

Funding Sources:	
CDBG	\$200,000.00
ESG
HOME	
HOPWA	
Total Formula
Prior Year Funds
Assisted Housing
PHA	
Other Funding	
Total	\$200,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 4. Community Sustainability – To plan, design and support local regional projects and initiatives that incorporate such elements as: green technology, pollution prevention technology, community-based amenities and services, environmental restoration, and long-		
Project Title	<u>Day Resource Center / SEA Permanent Supportive Housing</u>		
Project Description:	CDBG funds will be used to partially fund construction of a new Day Resource Center for the homeless.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: County Wide 6751 Columbia Gateway Drive, Columbia, MD 21046	
Objective Number: SL-1	Project ID: 004
HUD Matrix Code: 03C	CDBG Citation: 570.201(c)
Type of Recipient: Public 570.500(c)	CDBG National Objective: LMC 570.208(a)(1)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: Public Facility	Annual Units: 1
Local ID: 15CDBG- GRSDC	Units Upon Completion: 1

Funding Sources:	
CDBG	\$225,000.00
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$225,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 2. Homelessness - Comprehensively address the issue of homelessness by providing a Continuum of Care system that utilizes a "Housing First" approach to homelessness		
Project Title	<u>Emergency Public Facility</u>		
Project Description:	This activity will allocate funds for property acquired by long-term leasing of a public facility to be utilized for the provision of emergency housing. This activity will ensure the safety of Howard County Residents who are struggling with domestic abuse.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: Howard County/County Wide	
Objective Number: SL-1	Project ID: 005
HUD Matrix Code: 01	CDBG Citation: 570.201(a)
Type of Recipient: Public 570.500(c)	CDBG National Objective: LMC 570.208(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: Public Facility	Annual Units: 1
Local ID: 15CDBG-DHCVM	Units Upon Completion: 1

Funding Sources:	
CDBG	\$24,000.00
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$24,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 1. Housing - Expand opportunities for diverse and affordable housing options that are available for all income levels at our below 80% of AMI (Area Median Income).		
Project Title	<u>Permanent Supportive Housing for Homeless Families</u>		
Project Description:	CDBG funds will be used to provide funding for the acquisition and rehab of a single family unit which will house a homeless Howard County family.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input checked="" type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input checked="" type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: County Wide 6751 Columbia Gateway Drive, Columbia, MD 21046	
Objective Number: DH-2	Project ID: 006
HUD Matrix Code: 02	CDBG Citation: 570.201 (k)
Type of Recipient: Public 570.500(c)	CDBG National Objective: LMH 570.208(a)(3)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: Units	Annual Units: 1
Local ID: 15CDBG-HEHAH	Units Upon Completion: 1

Funding Sources:	
CDBG	\$50,000.00
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$50,000.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 2. Homelessness - Comprehensively address the issue of homelessness by providing a Continuum of Care system that utilizes a "Housing First" approach to homelessness prevention and intervention.		
Project Title	<u>Grassroots- Route 1 Day Resource Center</u>		
Project Description:	CDBG funds will be utilized to cover the cost of leasing of a public facility known as Route 1 Day Resource Center. The Center operated by Grassroots Crisis Intervention Center, provides funding to a local non-profit for leasing associated with a day center where critical social and human services are provided to both sheltered and unsheltered homeless individuals. The Center is located at 8826 Washington Boulevard, Jessup, MD, 20794.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: U.S Route 1 Corridor, Jessup, MD / 8826 Washington Boulevard, Jessup, MD, 20794	
Objective Number: SL-1	Project ID: 007
HUD Matrix Code: 03T	CDBG Citation: 570.201(e)
Type of Recipient: Public 570.500(c)	CDBG National Objective: LMC 570.208.(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: People	Annual Units: 60-75
Local ID: 15CDBG-GRSDR	Units Upon Completion: 60-75

Funding Sources:	
CDBG	\$46,681.00
ESG
HOME	
HOPWA	
Total Formula
Prior Year Funds
Assisted Housing
PHA	
Other Funding	
Total	\$46,681.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 2. Homelessness - Comprehensively address the issue of homelessness by providing a Continuum of Care system that utilizes a "Housing First" approach to homelessness prevention and intervention.		
Project Title	<u>Transitional Housing</u>		
Project Description:	CDBG funds will be used to cover a portion of the salary for the Transitional Housing Program Director and related costs associated with managing the program for domestic abuse victims.		
Objective Category:	<input checked="" type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area Savage/N. Laurel, MD / 9900 Washington Boulevard, Laurel, MD, 20723.	
Objective Number: SL-1	Project ID: 008
HUD Matrix Code: 05G	CDBG Citation: 570.201(e)
Type of Recipient: 570.500(c)	CDBG National Objective: LMC 570.208.(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: People	Annual Units: 150
Local ID: 15CDBG-DVCER	Units Upon Completion: 150

Funding Sources:	
CDBG	\$23,621.13
ESG	
HOME	
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA	
Other Funding	
Total	\$23,621.13

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 2. Homelessness - Comprehensively address the issue of homelessness by providing a Continuum of Care system that utilizes a "Housing First" approach to homelessness prevention and intervention		
Project Title	<u>Homelessness Prevention</u>		
Project Description:	CDBG funds will be used to provide eviction prevention financial resources for low to moderate income households in Howard County.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input checked="" type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input checked="" type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area Savage/N. Laurel, MD / 9900 Washington Boulevard, Laurel, MD, 20723.	
Objective Number: DH-2	Project ID: 009
HUD Matrix Code: 05T	CDBG Citation: 570.201(e)
Type of Recipient: 570.500(c)	CDBG National Objective: LMC 570.208.(a)(2)
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: People	Annual Units: 70
Local ID: 15CDBG-CACHP	Units Upon Completion: 70

Funding Sources:	
CDBG	\$38,380.00
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	\$38,380.00

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 5. Resource Management - Foster intragovernmental and public/private partnerships that promote effective and efficient use of tangible resources such as goods and equipment, financial and labor resources.		
Project Title	<u>HOME Program Administration</u>		
Project Description:	This project provides for the administration and coordination of the HOME Program. It does not require an objective or outcome category.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area 6751 Columbia Gateway Drive, Columbia, MD 21046	
Objective Number: N/A	Project ID: 010
HUD Matrix Code: 21H	CDBG Citation: N/A
Type of Recipient: N/A	CDBG National Objective: N/A
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: N/A	Annual Units: N/A
Local ID: 15HOME-DHCPA	Units Upon Completion: N/A

Funding Sources:	
CDBG	
ESG	
HOME	\$31,068.10
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	\$31,068.10

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 3. Self-Sufficiency – Expand and support a variety of affordable housing options, which in conjunction with needed supportive services, will maximize opportunities for residents to achieve both social and economic self-sufficiency.		
Project Title	<u>CHDO Set-aside</u>		
Project Description:	A qualified designated CHDO will use these funds for eligible CHDO activities that increase and retain affordable housing in the County. Funds will be used for acquisition and new construction of affordable housing and/or to purchase and rehabilitate existing properties to increase homeownership and/or rental opportunities for income eligible families.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input checked="" type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input checked="" type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: County Wide 6751 Columbia Gateway Drive, Columbia, MD 21046	
Objective Number: DH-2	Project ID: 011
HUD Matrix Code: 14G	CDBG Citation: N/A
Type of Recipient: N/A	CDBG National Objective: N/A
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: Housing Units	Annual Units: 2
Local ID: 15HOME-CHDOS	Units Upon Completion: 2

Funding Sources:	
CDBG	
ESG	
HOME	\$46,602.15
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	\$46,602.15

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name:	Howard County Government		
Priority Need:	Goal 1. Housing - Expand opportunities for diverse and affordable housing options that are available for all income levels at our below 80% of AMI (Area Median Income).		
Project Title	<u>HOME Housing Initiative Program</u> <u>Ellicott Terrace Redevelopment</u>		
Project Description:	HOME funds will be utilized to support the redevelopment of the Ellicott Terrace community.		
Objective Category:	<input type="checkbox"/> Suitable Living Environment	<input checked="" type="checkbox"/> Decent Housing	<input type="checkbox"/> Economic Opportunity
Outcome Category:	<input type="checkbox"/> Availability/Accessibility	<input checked="" type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability

Location / Target Area: 3050 Milltown Drive, Ellicott City, MD 21043.	
Objective Number: DH-2	Project ID: 012
HUD Matrix Code: 14B	CDBG Citation: N/A
Type of Recipient: N/A	CDBG National Objective: N/A
Start Date: 07/01/2015	Completion Date: 06/30/2016
Performance Indicator: Housing Units	Annual Units: 60 Completed
Local ID: 15HOME-DHCHL	Units Upon Completion: 60

Funding Sources:

CDBG	
ESG	
HOME	\$233,010.75
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	\$233,010.75

The primary purpose of the project is to help:

- | | |
|--|--|
| <input type="checkbox"/> the Homeless | <input type="checkbox"/> Persons with HIV/AIDS |
| <input type="checkbox"/> Persons with Disabilities | <input type="checkbox"/> Public Housing Needs |



Program Year 2015 Action Plan Schedule-Public Copy

January 1, 2015	Public Notice published in newspapers (Howard Times / Columbia Flyer)
January 13, 2015	Public Meeting and Application for Funding (RFP) - Gateway Housing Board Room 2:00-5:00 pm
February 11, 2015	RFP Application Submission Deadline 4:00 PM
February 19, 2015	Notice of Public Hearing (PH#1) published in newspapers (Howard Times / Columbia Flyer)
March 9, 2015	Public Hearing #1 – Housing & Community Development – Housing Board Room 6:00 PM – 7:00 PM
March 10, 2015	Notice of conditional selection/rejection to applicants
March 23, 2015	FFY15 DRAFT Action Plan public comment period begins (30-day review period) (Deadline to Pre-file)
March 26, 2015	Pre-file Date with County Council
April 6, 2015	Council Resolution regarding DRAFT Action Plan Introduced at County Council Meeting
April 20, 2015	Public Hearing #2 - County Council Hearing -Testimony on DRAFT Action Plan
April 21, 2015	Public Hearing #3 - HCD Board to vote on Action Plan submission
April 24, 2015	Public comment period ends
May 4, 2015	County Council vote on resolution regarding DRAFT Action Plan
May 15, 2015	FINAL Action Plan due to HUD (45 days prior to end of fiscal year)
July 1, 2015	CDBG / HOME Award Notice received from HUD

APPENDIX A: Fair Housing Action Plan

Fair Housing Action Plan	2012	2013	2014	2015
Goal: Establish over-arching fair housing policy to establish a foundation for affirmatively furthering fair housing				
Task: Upon the revision of the Master Plan, ensure that there is a statement of policy that clearly articulates the County's commitment to expanding fair housing choice	•			
Task: In evaluating the effectiveness of activities designed to affirmatively further fair housing, the County should rely upon empirical data describing the number of affordable housing opportunities created for members of the protected classes, especially those located in non-concentrated areas	•	•	•	•
Task: Prepare a written policy that encompasses HUD's Site and Neighborhood Standards and that can be incorporated as part of the application review and approval process for all applicable HOME-assisted projects.	•			
Goal: Promote the dispersal of affordable housing opportunities outside of areas of concentration				
Task: Continually monitor racial and ethnic concentrations and concentrations of lower-income persons in Columbia. Define a strategy to expand fair housing choice in areas outside of Columbia	•	•	•	•
Task: Define a strategy to address the need for fixed units of affordable rental housing for families in non-concentrated areas of the County		•		
Task: Work with area landlords and property management companies, in conjunction with HCHC, to encourage acceptance of Housing Choice Vouchers in non-impacted neighborhoods in the County	•	•	•	•
Task: Continue to educate landlord and Housing Choice voucher holders on their rights and responsibilities, particularly related to source of income discrimination, under the County Human Rights Law	•	•	•	•
Task: Facilitate HCVP training for staff members		•		•
Goal: Increase access to County programs for persons with limited English proficiency				
Task: Continue to monitor the language needs of the County's expanding population, providing the accommodations and services provided in the Language Access policy	•	•	•	•
Task: Continue to provide language services (interpreters, translators, etc.) on an as-needed basis	•	•	•	•
Goal: Ensure that members of the protected classes are represented on housing-related boards and commissions				
Task: Survey current board members on a voluntary basis to document race, gender, ethnicity and disability status	•	•	•	•
Task: Affirmatively recruit protected class members to fill vacancies on appointed boards and commissions	•	•	•	•

Goal: Increase the supply of housing affordable to households below 80% MHI, specifically in opportunity areas.				
Task: Continue to impose affordable unit set-asides through the MIHU program. Explore the feasibility of increasing the percentage of units to be set aside for moderate-income households
Task: Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in areas of opportunity.		.	.	.
Task: Partner with regional affordable housing developers to increase the supply of affordable housing throughout the County. Provide land, extend financial assistance, and reduce fees and regulatory requirements that impede the development of affordable rental housing for families in non-concentrated areas.
Goal: Reduce instances of housing discrimination				
Task: Continue to investigate discrimination complaints in accordance with the County Human Rights Law
Task: Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents and real estate agents
Goal: Mitigate the extent to which minorities are less commonly represented among those able to purchase a home				
Task: Continue to identify effective ways for the County, fair housing advocates, certified housing counselors and lenders to increase homeownership among members of the protected classes
Task: Continue to strengthen partnerships with local lenders to facilitate home ownership education and outreach with particular attention to members of the protected classes
Task: Contract with a qualified agency to perform housing discrimination testing in Howard County.		.	.	.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

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



Signature/Authorized Official

5/11/2015

Date

Allan H. Kittleman
County Executive

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year (~~2015~~ 2015 , ----- (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official

Allan H. Kittleman



Date

Title

County Executive

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature/Authorized Official



Date

Allan H. Kittleman

Title

County Executive

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.