Amended on May 19, 2020 to add the $770,356.00 CDBG CARES Act funds.

Executive Summary

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

1. Introduction

In accordance with federal requirements for jurisdictions receiving funds from the United States Department of Housing and Urban Development (HUD) for housing and community development programs, Howard County has prepared its FFY2019 Annual Action Plan in accordance with its four-year Consolidated Plan for FFY2016-2019.

Howard County remains the wealthiest county in Maryland, with a median household income of $115, 576 and the third wealthiest county nationwide according to the American Community Survey conducted by the United States Census Bureau. Howard County's FFY2016-2019 Consolidated Plan identifies that housing affordability is the primary barrier to households finding accessible, decent, safe and sanitary housing; 46.8 % of all renter households and 42.3% of all homeowner households are cost overburdened by 30% or more. Plus, the need for this housing far exceeds the supply of housing; especially for cost-burdened and low-income (LI) (6,039), very low-income (VLI) (5,265), and extremely low-income (ELI) (4,330) households in the County.

COVID-19 Narrative

Like many jurisdictions nationwide, Howard County has seen a significant increase in filings for unemployment insurance, due to the COVID-19 pandemic. As a result of the economic shutdown, job loss, furloughs, and a reduction in pay for many employees, **Howard County had seen more than 26, 000 people file for unemployment insurance,** as of May 14, 2020 with the highest number of filings during the first week of April. Job loss, reduction in pay, and furloughs have far-reaching negative consequences for many of the residents of the County. As of June 01, the County has had 1881 confirmed cases, 1384 active cases, 439 recovered cases and 58 deaths from COVID-19.

Comments from Virtual Public Hearings *(full comments in Citizen Participation Backup – AD-26)*

The County conducted three (3) virtual public needs hearings. During the discussions, it was noted that food insecurity and rental assistance are the overwhelming need across all income levels, and age cohorts. At present, the Governor of the State of Maryland has issued an eviction moratorium until the State of Emergency has been lifted. Many housing providers fear that evictions will begin to occur as

soon as the order is lifted. Housing providers are also concerned that these residents, will be unable to pay back rent, and could face eviction and/or become homeless.

On May 22, 2020 the Howard County Council passed Council Bill 33 prohibiting rent increases and evictions for at least 90 days after the County Executive's state of emergency order is lifted.

Some of the additional concerns of nonprofit landlords are that due to their clients losing their jobs and unable to pay rent, housing providers are experiencing low cash flows. It has become difficult for affordable housing providers to pay monthly expenses, such as utilities, staff costs, operating debt, and other operating costs. Many of our nonprofit landlords are having to rely on their limited "rainy day" funds to meet monthly expenses. There is also the overwhelming concern that Howard County will lose affordable rental properties if these entities are not able to weather this economic storm. It is believed that assisting clients with back rent will not only maintain these affordable units, but prevent residents from falling into homelessness.

2. Summarize the objectives and outcomes identified in the Plan

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

Please see AP-20 Annual Goals and Objectives section for this information.

3. Evaluation of past performance

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

The most recently completed program year is 2018. Our Consolidated Annual Performance and Evaluation Report (CAPER) for 2018 contained the following observations:

Howard County made good progress towards its Consolidated Plan goals over the last year:

- Added 2 additional units of homeless rental housing through the acquisition of real property with CDBG funding to create affordable housing for 2 homeless families;
- Assisted 23 households with critical repairs to their homes. The majority of assisted homeowners have incomes below 60% AMI; 57% of the repairs assisted female-headed households and 65% of the repairs helped elderly homeowners remain housed in decent, safe

and dry housing. As a result of this activity 9 income-eligible homeowners received new roofs on their homes;

- CDBG and HOME Program funds assisted in the preservation of 3 facilities that serve vulnerable populations;

- CDBG public service funds allowed for 173 people to be diverted from homelessness through housing stabilization funding, while 69 homeless individuals accessed critical social and support services for both the sheltered and unsheltered homeless and 197 victims of domestic violence/human trafficking were provided safe sheltering after fleeing situations of violence; and

- As a result of HOME Program funds, deferred loans were awarded for to 6 income-eligible households; therefore, making homeownership more affordable.

Based on the CAPER data, and other qualitative and quantitative information from providers, we assess that our progress in meeting our Consolidated Plan objectives are on track and that our funds are being used for the correct purposes. This assessment is made within the context of the County's overall budget and other resources available to assist low- and moderate-income Howard County residents.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Substantial Amendment Process to our FY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020, the County submitted a Waiver Letter to HUD requesting the use of those waivers allowing for **the virtual town hall meetings** and the **5-day public comment period.**

Howard County conducted three (3) virtual Public Needs Hearings on April 30, May 5 and May 7, 2020. The invitation was emailed to 138 stakeholders from the Nonprofit Stakeholder list maintained by the Department of Housing and Community Development. An application for this funding was released on May 1, 2020, for nonprofits to apply to the County for funding to respond to, and prepare for the effects of COVID-19 on many of the low to moderate-income residents.

The public notice was advertised May 21, 2020 in Howard County Times and Columbia Flyer regarding draft version of the Amended FFY2019 Annual Action Plan being available for view on the County's website beginning Thursday, June 4, 2020 at www.howardcountymd.gov under "Departments". All comments received by June 9, 2020, at 11:59.99 PM, were accepted.

Initial Planning Process

Howard County, in compliance with the County's Citizen Participation Plan, advertised and held five (5) public hearings on the needs and goals of the County's CDBG and HOME Programs. The public hearings provided residents with the opportunity to discuss the programs and to offer their suggestions on future program priorities. The public hearings were advertised in The Howard County Times and Columbia Flier on November 15, 2018, December 20, 2018, February 21, 2019, and March 28, 2019.

The County maintains a stakeholder contact list for the CDBG and HOME programs. All stakeholders received emails notifying the listees of the public hearings, meetings, and the survey. A "Draft Plan" was placed on display at the Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046 from February 25, 2019 until March 26, 2019 for review and comment. The draft plan review period was advertised in The Howard County Times and Columbia Flier on February 21, 2019. The advertisement was also published on the Department's webpage.

Additionally, during the planning phase of the Howard County's FFY2019 Annual Action Plan, the Department's staff created an online survey to acquire additional feedback from human service and housing providers, as well as advocates serving clients in Howard County. The survey was posted on the County's website for anyone that was interested in taking the survey. The survey was open from December 6, 2018 until February 28, 2019.

The County developed the Annual Action Plan based on the input received from stakeholders. All comments and surveys received during our needs assessment phase were considered in our CDBG and HOME program application process, ranking and review, and in the writing of Howard County's Annual Action Plan to HUD.

5. Summary of public comments

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

Comments contained in the Citizen Participation Backup found in the AD-26 Administrative screen - All comments and views were incorporated into this plan.

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

Comments contained in the Citizen Participation Backup found in the AD-26 Administrative screen - All comments and views were incorporated into this plan.

7. Summary

The County has allocated its CDBG and HOME program funds for FFY 2019 on activities that will principally benefit low- and moderate-income persons as well as presumed beneficiaries in some cases.

These activities can be categorized as Public Facilities, Housing, Public Services, Fair Housing, and Homeownership.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	HOWARD COUNTY	Department of Housing and Community Development
HOME Administrator	HOWARD COUNTY	Department of Housing and Community Development

Table 1 – Responsible Agencies

Narrative (optional)

Howard County's Department of Housing and Community Development is the administrating agency for the CDBG and HOME programs. The Department prepares the Four Year Consolidated Plan, Annual Action Plans, Environmental Review Records (ERRs), the Consolidated Annual Performance Evaluation Reports (CAPER), provides monitoring, processes pay requests, contracting and oversight of the programs on a day to day basis.

Consolidated Plan Public Contact Information

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Columbia, MD 21046
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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

Substantial Amendment Process to our FY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020, the County submitted a Waiver Letter to HUD requesting the use of those waivers allowing for **the virtual town hall meetings** and the **5-day public comment period.**

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The County developed the Annual Action Plan based on the input received from stakeholders. All comments and surveys received during our needs assessment phase were considered in our CDBG and HOME program application process, ranking and review, and in the writing of Howard County's Annual Action Plan to HUD.

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

Howard County acts as the single point of contact to coordinate efforts between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The County works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the County:

Howard County Department of Housing and Community Development - oversees the County's CDBG and HOME grant programs.
Howard County Housing Commission - manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing in mixed-income communities.

Social Services Agencies - provides services to address the needs of low- and moderate-income persons

Housing Providers - rehabilitates and develops affordable housing for low- and moderate-income families and individuals

Howard County Department of Community Resources and Services - oversees the Continuum of Care (CoC) Network for Howard County

Collaboration and coordination with these entities will continue throughout the four-year period in order to capitalize on potential future funding opportunities. Collaboration and coordination will take advantage of potential partnership opportunities that would result in increased benefits to low- and moderate-income households and persons.

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

Howard County does not receive a federal allocation for ESG Program funds. The County's Department of Community Resources and Services (DCRS, the CoC Lead Agency) receives ESG funds from the MD Department of Housing and Community Development, as pass-through funds from the federal government, matched with state ESG dollars. Even though the County is not considered to be a

recipient, as a grantee, DCRS follows the federal guidance on how ESG allocations are made. All ESG applications, reports, and monitorings are reviewed by the ERA Committee of the CoC Board. This ensures that all stated performance standards and evaluations of outcomes match the stated need and standards set forth in grant RFPs, and DCRS's Grant Agreement. ESG subgrantees participate in the coordinated assessment system, enter data into HMIS, and participate in CoC Steering Groups. DCRS solicits proposals from entities that have not received ESG funds previously. DCRS works to ensure that ESG funds are used to meet the needs of those experiencing homelessness and reallocates funds to decrease the number of persons that are experiencing homelessness. Annually, the ERA Committee reviews and sets priorities for the upcoming year's funding cycle.

The CoC Lead Agency manages the Housing Management Information Systems (HMIS) and has written policies and procedures for the administration of HMIS. The CoC uses ServicePoint (Bowman) as its HMIS software provider. All programs funded through ESG and CoC are required to enter all applicable data into HMIS. The HMIS Subcommittee meets quarterly to review data quality and discuss questions posed by providers. The HMIS Subcommittee holds monthly study halls and provides one-on-one training to subgrantees to ensure timeliness standards and data quality are maintained at a high standard.

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

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	HOWARD COUNTY HOUSING COMMISSION
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County Housing Commission was consulted to obtain information on the County's housing and community development needs.
2	**Agency/Group/Organization**	Howard County Department of Community Resources and Services
	Agency/Group/Organization Type	Other government - County

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Howard County Department of Community Resources and Services was consulted to obtain information on the County's housing and community development needs.
3	**Agency/Group/Organization**	Maryland Department of the Environment
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Maryland Department of the Environment was consulted to obtain information on the County's housing and community development needs.
4	**Agency/Group/Organization**	Association Of Community Services Of Howard County (ACS)
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Association of Community Services was consulted to obtain information on the County's housing and community development needs.

5	**Agency/Group/Organization**	Bridges to Housing Stability, Inc.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bridges to Housing Stability was consulted to obtain information on the County's housing and community development needs.
6	**Agency/Group/Organization**	COMMUNITY ACTION COUNCIL OF HOWARD COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Council of Howard County was consulted to obtain information on the County's housing and community development needs.
7	**Agency/Group/Organization**	Howard County Mental Health Authority
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County Mental Health Authority was consulted to obtain information on the County's housing and community development needs.
8	**Agency/Group/Organization**	Heritage Housing Partners Corp.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Heritage Housing Partnership was consulted to obtain information on the County's housing and community development needs.
9	**Agency/Group/Organization**	Howard County Autism Society
	Agency/Group/Organization Type	Advocacy
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County Autism Society was consulted to obtain information on the County's housing and community development needs.
10	**Agency/Group/Organization**	Howard County Department of Social Services
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County Department of Social Services was consulted to obtain information on the County's housing and community development needs.

11	**Agency/Group/Organization**	HUMANIM, INC.
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Services-Employment Mental Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HUMANIM was consulted to obtain information on the County's housing and community development needs.
12	**Agency/Group/Organization**	Help End Homelessness HC, Inc.
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Help End Homelessness HC was consulted to obtain information on the County's housing and community development needs.
13	**Agency/Group/Organization**	IHOMES, INC.
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IHOMES, Inc was consulted to obtain information on the County's housing and community development needs.
14	**Agency/Group/Organization**	Living in Recovery
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Living In Recovery was consulted to obtain information on the County's housing and community development needs.
15	**Agency/Group/Organization**	Rebuilding Together Howard County
	Agency/Group/Organization Type	Housing Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Rebuilding Together of Howard County was consulted on the County's housing and community development needs.
16	**Agency/Group/Organization**	Howard County Department of Corrections
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County Department of Corrections was consulted on the County's housing and community development needs.
17	**Agency/Group/Organization**	THE ARC OF HOWARD COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Arc of Howard County was consulted to obtain information on the County's housing and community development needs.
18	**Agency/Group/Organization**	We are Hope Works of Howard County
	Agency/Group/Organization Type	Housing Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	We Are HopeWorks of Howard County was consulted to obtain information on the County's housing and community development needs.
19	**Agency/Group/Organization**	Howard County Health Department
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Howard County's Department of Health will be consulted for any lead remediation and any statistics on persons affected by lead-based paint.

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

All agencies were consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Howard County Department of Resources and Services	The CoC is the primary provider of housing and supportive services for the area's homeless and at risk of being homeless population. The goals of the County and the CoC are complementary.
5 Year Plan and Annual Action Plan	Howard County Housing Commission	The Howard County Housing Commission is the lead agency providing Section 8 vouchers in the County. The goals of the County and Howard County Housing Commission are complementary.
The 2012 Comprehensive Plan	Howard County Government	The 2012 Comprehensive Plan was developed as a plan for land use and land conservation and multiyear development plans for transportation, public facilities, water, sewage, parkland, housing, human services, and environmental protection. The goals of the plans are complementary.
The Analysis of Impediments to Fair Housing	Baltimore Regional Housing Initiative	The Regional Analysis of Impediments (RAI) is currently underway and the County has been participating in the monthly work sessions. Once the plan is complete, the County will adopt the document.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Howard County's Department of Housing and Community Development is the lead planning and administering agency in the County's CDBG and HOME programs. The vision of Howard County's FFY2016-2019 Consolidated Plan seeks to develop a viable community by promoting integrated

approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low- and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for-profit and non-profit organizations. The planning process for the FFY2019 Annual Action Plan, Year 4 of our Four Year Consolidated Plan, maintained consistency in the County's commitment to partnering.

AP-12 Participation – 91.105, 91.200(c)

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

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Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Public Hearing was held Thursday, December 6, 2018	A summary of the Public Hearing can be found in the Citizen Participation Plan	All comments were accepted.	
2	Public Hearing	Non-targeted/broad community	Public Hearing was held on Thursday, January 10, 2019.	A summary of the Public Hearing can be found in the Citizen Participation Plan.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	Public Hearing to be held on Wednesday, March 13, 2019.	No one attended and no comments were received.	N/A	
4	Public Hearing	Non-targeted/broad community	Public Hearing to be held on Thursday, April 11, 2019.	There were no comments or concerns received.	N/A	
5	Public Hearing	Non-targeted/broad community	Public Hearing to be held Monday, April 22,2019.	There were no comments or concerns received.	N/A	
6	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Needs Hearing, Thursday, April 30, 2020.	All comments can be found in the Citizen Participation Backup - CDBG-CV Needs Hearing Notes	N/A	
7	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Needs Hearing, Tuesday, May 5, 2020.	All comments can be found in the Citizen Participation Backup - CDBG-CV Needs Hearing Notes	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Needs Hearing, Thursday, May 7, 2020	All comments can be found in the Citizen Participation Backup - CDBG-CV Needs Hearing Notes	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Howard County has done a Substantial Amendment to our FFY2019 Annual Action Plan in response to **$770,356.00 CDBG-CV funding** the County will receive.

Initial Allocation Amounts

Howard County received our FFY2019 CDBG and HOME allocation amounts, through our Baltimore CPD Field Office, which were posted on HUD's website on Friday, April 12, 2019. The County received **$1,246,937.00 CDBG and $422,239.00 in HOME** Program funding. The table below

has been updated to reflect these amounts.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,246,937	10,779	0	1,257,716	0	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	422,239	30,764	0	453,003	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Other	public - federal	Other	770,356	0	0	770,356	0	CDBG-CV funds to be used to prevent, prepare for and respond to the Coronavirus.

Table 5 - Expected Resources – Priority Table

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

The 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.

HOWARD COUNTY COVID-19 FUNDING- LEVERAGE FOR CDBG-CV FUNDING

Howard County has allocated an additional **$800, 000 in County funding for rental assistance and eviction relief** for low- and moderate-income families, with $300,000 coming from the Disaster Relief and Recovery Initiative in the proposed budget and $500,000 coming from Moderate Income Housing Unit (MIHU) fee-in-lieu revenue sources. These funds will be used in conjunction with the CDBG-CV award to help combat housing insecurity due to the Coronavirus.

For the projects submitted through the original application, Howard County had funded an additional $6,050,719 from the Community Services Partnership (CSP) Grants for County Fiscal Year 2019. Additionally, through a newly created funding application, the County's MIHU Fee-In-Lieu Program, ($400,000) will further support the goals set within the Consolidated Plan.

A proposed budget of $3,004,000 for the County's Housing Initiative Loan Fund has been requested for County Fiscal Year 2019.

The County will use $122,844.00 for the 25% match contributions from the County's Banked Match from prior projects as HOME match for FFY2019. The match requirement is now waived for program year FFY2019.

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

The following locations have been identified as potential for future development:

- W. Watersville Road, Mt. Airy - Tax ID 333217
- SE/side, Beetz Road, Mt. Airy – Tax ID 333195
- 589 Woodbine Road, Woodbine – Tax ID 313089
- Woodbine Road, Woodbine – Tax ID 374355
- 15959 Union Chapel Road, Woodbine – Tax ID 323742
- Route 40 @ Pine Orchard, Ellicott City – Tax ID 258714
- 3420 Martha Bush Drive, Ellicott City – Tax ID 218488
- Rogers Avenue, Ellicott City – Tax ID 265729
- 3713 Fels Lane, Ellicott City – Tax ID 201259
- 7151 Mayfield Avenue, Elkridge – Tax ID 159496
- Adjacent to MD Route 100, Ellicott City – Tax ID 291483
- 12201 Hall Shop Road, Clarksville – Tax ID 351995
- Route 29, Laurel – Tax ID 391478

Discussion

The County's CDBG and HOME program year runs from July 1, 2019, through June 30, 2020. These funds will be used to address the following priority needs set within the FFY 2016 to FFY 2019 program years:

- Housing
- Homeless
- Other Special Needs
- Community Development
- Administration, Planning, and Management

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HS-1 Housing Rehabilitation	2016	2019	Affordable Housing	Howard County	Housing Priority	CDBG: $175,266	Homeowner Housing Rehabilitated: 32 Household Housing Unit
4	HS-4 Home Ownership	2016	2019	Affordable Housing	Howard County	Housing Priority	HOME: $120,000	Direct Financial Assistance to Homebuyers: 3 Households Assisted
7	HO-2 Operation/Support	2016	2019	Homeless	Howard County	Homeless Priority	CDBG: $42,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
8	HO-3 Prevention and Housing	2016	2019	Homeless	Howard County	Homeless Priority	CDBG: $100,000	Homelessness Prevention: 63 Persons Assisted
9	HO-4 Housing	2016	2019	Homeless	Howard County	Homeless Priority	CDBG: $300,183	Rental units rehabilitated: 12 Household Housing Unit Housing for Homeless added: 1 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	SN-1 Housing	2016	2019	Non-Homeless Special Needs	Howard County	Other Special Needs Priority	CDBG: $150,000 HOME: $200,000	Rental units constructed: 0 Household Housing Unit Rental units rehabilitated: 12 Household Housing Unit Homeless Person Overnight Shelter: 100 Persons Assisted Other: 3 Other
14	CD-1 Community Facilities	2016	2019	Non-Housing Community Development	Howard County	Community Development Priority	CDBG: $364,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1615 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Homeless Person Overnight Shelter: 100 Persons Assisted Other: 1 Other
16	CD-3 Public Services	2016	2019	Non-Housing Community Development	Howard County	Community Development Priority	CDBG: $177,621	Public service activities for Low/Moderate Income Housing Benefit: 35 Households Assisted
27	AM-1 Overall Coordination	2016	2019	Administration, Planning, and Management	Howard County	Administration, Planning, and Management Priority	CDBG: $185,173 HOME: $49,138	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
28	AM-2 Fair Housing	2016	2019	Administration, Planning, and Management	Howard County	Administration, Planning, and Management Priority	CDBG: $66,400	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	HS-1 Housing Rehabilitation
	Goal Description	Continue to provide financial assistance to low - and moderate-income homeowners to rehabilitate their existing owner-occupied housing.
4	**Goal Name**	HS-4 Home Ownership
	Goal Description	Assist low-and moderate-income households to become homeowners by providing down payment assistance, closing cost assistance, and requiring housing counseling training.
7	**Goal Name**	HO-2 Operation/Support
	Goal Description	Assist providers in the operating of housing and support services for the homeless and persons at-risk of becoming homeless.
8	**Goal Name**	HO-3 Prevention and Housing
	Goal Description	Continue to support the prevention of homelessness and programs for rapid rehousing.

9	**Goal Name**	HO-4 Housing
	Goal Description	Support the rehabilitation of and making accessibility improvements to emergency shelters, transitional housing, and permanent housing for the homeless.
11	**Goal Name**	SN-1 Housing
	Goal Description	Increase the supply of affordable, decent, safe, sound and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing buildings and new construction.
14	**Goal Name**	CD-1 Community Facilities
	Goal Description	Improve the parks, recreational centers, trails, libraries, and all public and community facilities in the County.
16	**Goal Name**	CD-3 Public Services
	Goal Description	Improve and increase public safety, municipal services, and public services programs throughout the County.
27	**Goal Name**	AM-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful adminstration of Federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing and compliance with all Fderal, state and local laws and regulations.
28	**Goal Name**	AM-2 Fair Housing
	Goal Description	Promote fair housing choice through education and outreach in the County.

Projects

AP-35 Projects – 91.220(d)

Introduction

In order to address the identifiable needs of Howard County, the proposed FFY 2019 One-Year Action Plan proposes the following activities:

Projects

#	Project Name
1	CDBG Program Administration
2	Fair Housing Regional AI Coordinator
3	OHR- Fair Housing Activity
4	Roger Carter Recreation Center Development
5	Emergency Public Facility
6	Living in Recovery Rehabilitation
7	Help End Homelessness Rehabilitation Project
8	The Arc. of Howard County Rehabilitation
9	Bridges to Housing Stability - Acquisition
10	Bridges to Housing Stability - Rehabilitation
11	Rebuilding Together Howard County Homeowner Rehabilitation
12	Route One -Day Resource Center (DRC)
13	Hope Works Inc. - Transitional Housing
14	Community Action Council - Housing Stability Program
15	iHomes Inc. Greenfields and Scattered Site Acquisition
16	Future Affordable Housing Project
17	Down Payment and Closing Cost Assistance
18	HOME Program Administration
19	Bridges to Housing Stability - Housing Stability (CDBG-CV)
20	Howard County Housing Commission - Housing Stability (CDBG-CV)

Table 7 - Project Information

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

The allocations and priorities were established through discussions with County decision makers, meetings with stakeholders, survey responses, and public meetings. The largest obstacle to addressing the County's underserved needs are financial in nature. There is a need for additional federal, state, and

local funding to undertake additional housing and community development projects.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	CDBG Program Administration
	Target Area	
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $184,080
	Description	Howard County will use CDBG funds towards the administration of the CDBG program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. The staff member is responsible for performing program related duties, such as financial, environmental, and program eligibility according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with the funding agency, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, preparing and submitting performance reports.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration of all CDBG program activities.
2	**Project Name**	Fair Housing Regional AI Coordinator
	Target Area	
	Goals Supported	AM-2 Fair Housing
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $6,400

	Description	Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County in cooperation with these jurisdictions contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which was formally accepted in February 2012. The AI Coordinator works to guide the implementation of the regional initiatives to address identified potential impediments to Fair Housing Choice. This activity is funded out of the 20% Administration cap.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Howard County's portion of the Fair Housing Policy Coordinator position.
3	**Project Name**	OHR- Fair Housing Activity
	Target Area	
	Goals Supported	AM-2 Fair Housing
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $60,000
	Description	The Howard County Office of Human Rights will use CDBG funding to conduct matched paired testing of market rate units in the County. This activity proposes to address several of the impediments to fair to fair housing identified in 2012 Analysis of Impediments to Fair Housing Choice. This activity is funded out of the 20% Administration cap.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	To conduct fair housing testing and training regarding within Howard County.
4	**Project Name**	Roger Carter Recreation Center Development
	Target Area	
	Goals Supported	CD-1 Community Facilities
	Needs Addressed	Community Development Priority
	Funding	CDBG: $200,000
	Description	The Howard County Housing Commission, a 501 (c)(3) nonprofit and a Howard County's Housing and Community Development Organization, invests annual CDBG funds under an approved Pre-award strategy for this project. The Roger Carter Recreation Center Re-development is a key vehicle for neighborhood revitalization. This activity will benefit the residents of Burgess Mill Station and surrounding Ellicott City area in the community located on Burgess Mill Way, Ellicott City, MD 21043. This Project will serve approximately 500 Howard County residents in FFY19.
	Target Date	6/30/2043
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 500 income-eligible individuals will served with this activity.
	Location Description	
	Planned Activities	Acquisition by long term lease.
5	**Project Name**	Emergency Public Facility
	Target Area	
	Goals Supported	HO-4 Housing
	Needs Addressed	Homeless Priority
	Funding	CDBG: $24,000

	Description	The Howard County Housing Commission, a 501 (c)(3) nonprofit and a Howard County Housing and Community Development Organization, invests annual CDBG funds under an approved Pre-award strategy for this project. This activity will allocate funds to support the property acquired by long-term leasing of a public facility being utilized as a provision of emergency housing. This activity ensures the safety of Howard County Residents who are struggling with domestic abuse.Eligibility requirement: Howard County residents fleeing domestic violence situations. This Project will serve approximately 100 Howard County residents in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Howard County residents fleeing domestic violence situations. This Project will serve approximately 100 Howard County residents in FFY19.
	Location Description	
	Planned Activities	Homeless sheltering.
6	**Project Name**	Living in Recovery Rehabilitation
	Target Area	
	Goals Supported	CD-1 Community Facilities
	Needs Addressed	Housing Priority
	Funding	CDBG: $24,029
	Description	Living in Recovery Inc., a 501 (c) (3) non-profit in Howard County will utilized CDBG funds in FFY19 a roof replacement, bathroom renovations, regrade yard, install asphalt, reconfigure basement, and replace floor covering in one their sober living facilities. Income eligibility: Howard County residents recovering from addictions that earn between zero and eighty percent of the area median income (AMI) for the HUD Baltimore- Columbia-Towson Metropolitan Statistical Area (MSA).Eligibility requirement: Rehabilitation of a public facility. Projection: 1 UnitThe project will serve approximately 8 individuals in FFY19.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	The project will serve approximately 8 low to moderate income individuals in FFY19.
	Location Description	
	Planned Activities	Rehabilitation of a single room occupancy unit facility that houses persons recovering from drug and alcohol addiction.
7	**Project Name**	Help End Homelessness Rehabilitation Project
	Target Area	
	Goals Supported	CD-1 Community Facilities
	Needs Addressed	Community Development Priority
	Funding	CDBG: $15,000
	Description	Help End Homelessness Howard County (HEH), a 501 (c)(3) nonprofit, will utilize CDBG funds to replace the existing HVAC system with a more energy efficient unit in one of the units that houses a previously homeless Howard County family.Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: HEH will rely on the Howard County Coordinated System of Homeless Services (CSHS) to assist in identifying clients who are receiving supportive services and are in need of affordable housing.This Project will serve approximately 1 family or 4 Howard County residents in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 1 previously homeless family or 4 Howard County residents in FFY19.
	Location Description	
	Planned Activities	Facilities and Improvements.
8	**Project Name**	The Arc. of Howard County Rehabilitation
	Target Area	
	Goals Supported	CD-1 Community Facilities

	Needs Addressed	
	Funding	CDBG: $98,907
	Description	The Arc of Howard County, a 501 (c) (3) nonprofit will use CDBG funds for the replacement of the failing roof on a facility that supports many activities and programs for persons with intellectual and developmental disabilities. Income eligibility: Howard County residents with severe disabilities that earn between zero and eighty percent of the area median income (AMI) for the HUD Baltimore- Columbia-Towson Metropolitan Statistical Area (MSA).Eligibility requirement: Rehabilitation of a public facilityProjection: 1 UnitThe project will serve approximately 1115 individuals and their families in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project will serve approximately 1115 individuals and their families in FFY19.
	Location Description	
	Planned Activities	
9	**Project Name**	Bridges to Housing Stability - Acquisition
	Target Area	
	Goals Supported	HO-4 Housing
	Needs Addressed	Housing Priority
	Funding	CDBG: $249,090
	Description	Bridges to Housing Stability, Inc., a 501 (c)(3) nonprofit, will utilized CDBG Program funds to acquire one (1) housing unit in FFY19 to rent to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: Acquisition of existing dwelling units.This project will create 1 unit of affordable housing in Howard County in FFY19.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	(1) housing unit in FFY19 to rent to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD.
	Location Description	
	Planned Activities	Bridges to Housing Stability, Inc. will acquire 1 unit.
10	**Project Name**	Bridges to Housing Stability - Rehabilitation
	Target Area	
	Goals Supported	HS-1 Housing Rehabilitation
	Needs Addressed	Community Development Priority
	Funding	CDBG: $48,907
	Description	Bridges to Housing Stability, Inc., a 501 (c)(3) nonprofit, will utilized CDBG Program funds to rehabilitate twelve (12) rental housing units they own in their Alliance Program portfolio in FFY19. The renovations will make the homes safer and more accessible for disabled and aging family members. As well as addressing inefficient units with energy efficient upgrades. Bridges rent to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: Acquisition of existing dwelling units.This project will renovate 12 unit of affordable housing in Howard County in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	CDBG Program funds to rehabilitate twelve (12) rental housing units they own in their Alliance Program portfolio in FFY19. The renovations will make the homes safer and more accessible for disabled and aging family members. As well as addressing inefficient units with energy efficient upgrades. Bridges rent to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD.
	Location Description	

	Planned Activities	Rehabilitation of existing affordable rental units.
11	**Project Name**	Rebuilding Together Howard County Homeowner Rehabilitation
	Target Area	
	Goals Supported	HS-1 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: $174,173
	Description	Rebuilding Together, Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide free home repairs to Howard County low to moderate income homeowners to preserve the stock of safe, affordable single family homes in Howard County. Rebuilding Together clients include veterans, people with disabilities, families with small children and the elderly.Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.This Project will serve approximately 32 households in Howard County in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 32 extremely-low to low-income households in Howard County in FFY19.
	Location Description	
	Planned Activities	Rehabilitation of homeowner occupied housing.
12	**Project Name**	Route One -Day Resource Center (DRC)
	Target Area	
	Goals Supported	CD-3 Public Services
	Needs Addressed	Homeless Priority
	Funding	CDBG: $39,693

	Description	Grassroots Crisis Intervention Center, Inc. (Grassroots), a 501 (c)(3) nonprofit, will utilize CDBG funds for utility expenses associated with the newly constructed Day Resource Center where critical social and human services are provided to both sheltered and unsheltered homeless individuals. The Center is open three (3) times a week for four (4) hours.Mondays 2pm-6pmWednesday 2pm-6pmSaturdays 10am-2pmEligibility requirement: Presumed HomelessThis Project will serve approximately 100 homeless Howard County residents in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 100 homeless Howard County residents in FFY19.
	Location Description	
	Planned Activities	Public service activity.
13	**Project Name**	Hope Works Inc. - Transitional Housing
	Target Area	
	Goals Supported	CD-3 Public Services
	Needs Addressed	Housing Priority
	Funding	CDBG: $34,528

	Description	Hope Works of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide partial salary for the Transitional Housing Victims Advocate and partial utility payments for their transitional houses to operate their program. The Transitional Housing Program provides housing to Howard County residents that are made homeless due to sexual and intimate partner violence and allows victims to be housed for up to one (1) year. Clients have access to all Hope Works services such as legal advocacy/representation, clinical counseling and case management. Referrals for employment training, education and other community services are also available.HopeWorks is the sole provider of comprehensive domestic violence and rape crisis and recovery services in Howard County. Specifically, HopeWorks is the only residential program in the county that has the experience, expertise and internal capacity necessary to address the multiple, interlocking needs of domestic violence victims, and their families.Eligibility requirement: Howard County residents fleeing domestic violence situations. This Project will serve approximately 35 households in Howard County in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Howard County residents fleeing domestic violence situations. This Project will serve approximately 35 households in Howard County in FFY19.
	Location Description	
	Planned Activities	Public Service
14	**Project Name**	Community Action Council - Housing Stability Program
	Target Area	
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG: $98,907

	Description	The Community Action Council of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide housing stability for low and moderate income Howard County residents through eviction prevention for low to moderate income households in Howard County. Direct payment to landlords and/or mortgage companies will be made based on an eviction judgment.Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: Direct payments based on eviction judgment/proceedings.This Project will serve approximately 63 households in Howard County in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Direct payments based on eviction judgment/proceedings. This Project will serve approximately 63 households in Howard County in FFY19.
	Location Description	
	Planned Activities	Housing Stability Activity
15	**Project Name**	iHomes Inc. Greenfields and Scattered Site Acquisition
	Target Area	
	Goals Supported	SN-1 Housing
	Needs Addressed	Housing Priority
	Funding	HOME: $200,000

	Description	iHomes Inc., a 501 (c) (3) non profit and only certified CHDO in Howard County will utilize HOME funds to complete the design, develop, build of three single family dwelling units, known as Greenfields, for persons with varying degrees of developmental and physical disabilities. Additionally, the HOME Program funding will be gap funding for the acquisition of 3 existing condominium units to provide housing for extremely low income persons with disabilitiesSupport services will be provided by Humanim Inc. The units will be designed using green building strategies that will result in a net zero energy efficient building. Income eligibility: Howard County residents with severe disabilities that earn between zero and sixty percent of the area median income (AMI) for the HUD Baltimore- Columbia-Towson Metropolitan Statistical Area (MSA).Eligibility requirement: Acquisition of existing residential units.The project will create 3 units of affordable housing in FFY19.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project is anticipated to serve 6 individuals who are Howard County residents with severe disabilities that earn between zero and eighty percent of the area median income (AMI) for the HUD Baltimore-Columbia-Towson Metropolitan Statistical Area (MSA).
	Location Description	
	Planned Activities	Acquisition and new construction of affordable special needs housing.
16	**Project Name**	Future Affordable Housing Project
	Target Area	
	Goals Supported	SN-1 Housing
	Needs Addressed	Housing Priority
	Funding	HOME: $90,779
	Description	Howard County will allocate HOME Program funds for property acquisition, disposition, and rehabilitation in connection with the development of affordable housing units. This includes but is not limited to the provision of rental housing, tenant-based rental assistance or homebuyer activities that will create affordable housing units and ultimately prevent and reduce instances of homelessness. This activity will utilize $122,238.40 of HOME Program Entitlement (EN) funds and $30,764.19 of Program Income (PI) funds.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project is anticipated to create affordable housing for 1 income-eligible household
	Location Description	
	Planned Activities	Future affordable housing development.
17	**Project Name**	Down Payment and Closing Cost Assistance
	Target Area	
	Goals Supported	HS-4 Home Ownership
	Needs Addressed	Housing Priority
	Funding	HOME: $120,000
	Description	The Department of Housing and Community Development will provide down payment and /or closing cost assistance to eligible homebuyers for the purchase of one dwelling unit in Howard County. Eligible awardees will meet the HUD program household income limits and attend homebuyer workshops offered in the County. It is anticipated this funding will serve 3 income eligible households in FFY19.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated this funding will serve 3 income eligible households in FFY19.
	Location Description	
	Planned Activities	Down payment and closing cost assistance.
18	**Project Name**	HOME Program Administration
	Target Area	
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	HOME: $42,224

	Description	Howard County will use HOME funds towards the administration of the HOME program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. Staff members are responsible for performing program related duties, such as financial, environmental, and program eligibility review according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with funding agencies, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, tracking match, monitoring program rents and incomes and preparing and submitting performance reports.Howard County HOME program during the FFY19 program year.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	HOME Program Administration Costs
19	**Project Name**	Bridges to Housing Stability - Housing Stability (CDBG-CV)
	Target Area	
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG-CV: $257,643
	Description	Bridges to Housing Stability, a 501 (c)(3) nonprofit, will use CDBG funding to provide short-term rental payments up to 3-months for low and moderate-income Bridges residents that have had COVID-19 related job loss resulting in the household's inability to pay their rent. Income eligibility: Bridges to Housing Stability residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: Missed rent payments due to job loss or severe reduction in work hours due to the COVID-19 economic shut-down to prevent the spread of the virus.This project will serve approximately 175 households in Howard County in FFY19.

	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 1**75** households in Howard County in FFY19.
	Location Description	Countywide
	Planned Activities	Eligible Activity: Public Service (Matrix Code: 05Q Subsistence Payments)
20	**Project Name**	Howard County Housing Commission - Housing Stability (CDBG-CV)
	Target Area	
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG-CV: $512,713
	Description	The Howard County Housing Commission (HCHC) is a public body corporate and politic, and the public housing authority for Howard County. HCHC will use CDBG funding to provide short-term rent payments up to 3-months for low and moderate-income Commission residents that have had COVID-19 related job loss resulting in the households inability to pay their rent. Income eligibility: HCHC residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.Eligibility requirement: Missed rent payments due to job loss or severe reduction in work hours due to COVID-19 economic shut-down to prevent the spread of the virus.This Project will serve approximately 200 households in Howard County in FFY19.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately **200** households in Howard County in FFY19.
	Location Description	Eligible Activity: Public Service (Matrix Code: 05Q Subsistence Payments)
	Planned Activities	Countywide

AP-50 Geographic Distribution – 91.220(f)

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

Howard County will direct CDBG and HOME funds countywide. It is the policy of Howard County that activities will not be qualified based on service area benefit. On June 4, 2014, Howard County passed Bill No. 18-2014, an Act amending the Rehabilitation Loan Program to allow loans for renovations and expansions; amending the moderate income housing unit provisions to prohibit certain alternatives in certain areas; requiring the use of fee in lieu funds for homeownership opportunities in certain areas; prohibiting the Department of Housing and Community Development and the Housing Commission from participating in certain housing projects; and generally related to moderate income housing units and the Rehabilitation Loan Program in Howard County. Specific to CDBG and HOME funds, the Bill restricted the construction of housing in Census Tracts and Block Groups if the poverty level is 10% or greater. The purpose of the Bill was to address concentration of subsidized housing and to encourage future affordable housing development outside of areas of concentration thus affirmatively furthering fair housing.

Geographic Distribution

Target Area	Percentage of Funds
Howard County	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The County has allocated its CDBG and HOME Program funds for FFY 2019 based on which activities will principally benefit low- and moderate-income persons.

The Public Facilities activities serve a low- and moderate-income clientele or presumed benefit.

The Housing activities have an income eligibility criterion; therefore, the income requirement restricts funds to only low- and moderate-income households throughout the County.

The Public Service activities serve a low- and moderate-income clientele or presumed beneficiaries.

Discussion

Howard County has done a Substantial Amendment to our FFY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. These funds which were added to FFY2019 annual allocation of CDBG funds in the amount of $1,246,937 and an anticipated $10,778.8 in program

income for the amended FFY2019 budget of $2,028,071.81

The County will budget $184,080.10 for general administration and $66,400 for Fair Housing activities for a total Administration and Planning Budget of $250,480.10 (12.0%).

The balance of funds ($1,777,591.71) will be allocated to activities which principally benefit low- and moderate-income persons in the amount of $1,777,591.71 (82.0%) and $0 for the removal of slums and blight (0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities $361,936.01 (18.0%), Housing activities $472,170.78 (23.0%), and Public Service activities $943,484.92 (47.0%). **Public Services - The CARES Act Waived the 15% Public Service Cap for FFY19 & FFY20.**

The County makes applications available to non-profits, for-profit agencies, and other public agencies/organizations for CDBG eligible funded activities. A percentage of the County's Community Development Block Grant (CDBG) funds are awarded on a competitive basis to applicants of eligible activities. The applications are reviewed by the Department of Housing and Community Development and finally submitted to the Howard County Council for approval.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Howard County will utilize its CDBG and HOME funds to address the County's affordable housing needs through the continuation of production of new housing units, rehabilitation of existing housing units, and acquisition of existing housing units.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	483
Special-Needs	3
Total	486

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	438
The Production of New Units	0
Rehab of Existing Units	44
Acquisition of Existing Units	4
Total	486

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

Discussion

Howard County will utilize its CDBG and HOME funds to address the County's affordable housing needs through the production of new housing units, rehabilitation of existing housing units, and acquisition of existing housing units.

Howard County intends to complete the following affordable housing goals during FFY 2019:

- Rehab forty-four (44) existing affordable housing units - incomes below 60%AMI;
- Acquire one (1) existing units (1) family unit below 60% AMI,
- Acquire three (3) single-family units by CHDO to create Special Needs Rental housing - incomes below 60% AMI; and
- Provide rental assistance to 438 households, preventing homelessness.

AP-60 Public Housing – 91.220(h)

Introduction

The Howard County Housing Commission received $9,911,530 in FFY 2018 funding. Funding for FFY 2018 was slightly reduced as compared to FFY 2017's funding allocation of $10,084,128. The average Housing Assistance Payment for voucher units in 2018 was $1,080.79 per unit month.

The Housing Commission anticipates the following financial resources during the upcoming fiscal year:

- HCV HAP Funds $10,239,397
- HCV Administrative Fees $753,163
- FSS Coordinator Funds $61,056
- Portability HAP Funds $8,292,264
- Portability Administration Fees $270,500
- HOPWA Funds $244,945

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

The Housing Authority identified the following new activities under its FFY 2017 Annual PHA Plan:

The Housing Commission will continue its participation in a regional initiative to project base one hundred (I00) vouchers in opportunity areas in the Baltimore Region. Howard County will be contributing 3 project based vouchers toward this initiative. The project is being coordinated by the Baltimore Regional Council and Howard County serves as the fiscal agent for the project.

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

The Howard County Housing Commission operates a Homeownership Voucher Program. The Commission does not limit the number of families participating in the program. The program eligibility requirements are as follows:

Families participating in the Section 8 Homeownership Program must be in good standing and must have participated in the Section 8 Program, or other Howard County or Housing Commission programs for at least 2 years prior to execution of the Contract of Sale. The family must also have participated in the Family Self Sufficiency Program for a period of at least 6 months prior to the date of settlement.

The minimum income required for program participation is $24,000.00. If the family meets the HUD minimum income requirements of the Federal Minimum hourly wage rate multiplied by 2,000 hours and

has been pre-qualified for financing with a lending institution which meets the requirements of Section 25.7 of this plan, they are exempted from the $24,000.00 minimum income requirement.

Welfare assistance shall not be counted towards the $24,000.00 minimum income requirement unless the head of the household is elderly or disabled, as defined in the Administrative Plan.

Eligible families must demonstrate that at least one adult member of the family who will own the home at commencement of homeownership assistance is currently employed at least 30 hours per week, and has been continuously employed for at least one year prior to the commencement of homeownership assistance. This requirement does not apply for families where the head of household is elderly or disabled.

In order to qualify for participation in the Section 8 Homeownership Program, the family must qualify as a "first-time homeowner". A first-time homeowner is defined as a family of which no member owned or presently has any ownership interest in a unit during the three years before the commencement of homeownership assistance. A first-time homeowner also includes a single parent or displaced homemaker who while married, owned a home with his or her spouse, or resided in a home owned by his or her spouse.

Eligible families shall not include any family with a member who has previously received assistance under the homeownership option and has defaulted on a mortgage securing debt incurred to purchase the home.

Prior to commencement of homeownership assistance, the family must attend and satisfactorily complete pre-assistance homeownership counseling with a HUD-approved counseling agency, or an equivalent program of counseling activities as designated by the Commission.

The Housing Commission sponsors a "Getting Ahead" Program that targets Family Self Sufficiency Participants, Zero Income Families and other low-income families residing in Howard County. The "Getting Ahead" Initiative examines the causes of Poverty and helps participants to understand that poverty is not simply caused by the choices of the individual, but is both "generational" and "situational". Program participants perform a Self-Assessment, identify personal strengths and establish a personal plan for building resources. The initiative focuses on "Bridges out of Poverty" and examines what the community has to offer as well as what participants can contribute to the community.

HCHC's HUD required FSS program size is sixty-nine families; however, this number is reduced each time a program participant graduates. This number will be expanded to comply with the minimum program size required by HUD as HCHC is awarded additional units. The required program size minus program graduations are currently forty-three (43) families. The actual number of families currently enrolled in FSS is Thirty-eight (38). HCHC will assist additional families above the HUD required program size

provided the resources and support network is available to meet the needs of participating families

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

Not applicable; the Housing Authority is not designated a "troubled" in its most recent SEMAP assessment.

Discussion

Howard County has identified that there is a need for affordable, accessible, decent, safe, and sanitary housing to address the households affected by housing problems, severe housing problems, and housing cost burdens. The largest income group affected by housing problems in the County are extremely low-income households. The Howard County Housing Commission is a vital part of the County's housing strategy. The Housing Commission is the primary assisted housing provider of housing for extremely low income, very low income, and lower-income residents of Howard County.

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

Introduction

The Department of Community Resources and Services (DCRS) is the Lead Agency for both the Howard County Continuum of Care (CoC) and Homeless Management Information System (HMIS). DCRS receives CoC funding on behalf of Howard County Government, and works with partner agencies to further the goals of HUD. DCRS prepares and submits the CoC Collaborative Application to HUD. DCRS is a direct Recipient on behalf of Howard County, MD for all CoC Funds.

In Fall 2017, the Board to Promote Self-Sufficiency, the CoC Board, through its strategic planning process, voted to separate its efforts from those of the CoC. This provided an opportunity for the CoC to reconstitute itself and establish a new Board with the sole goal of addressing homelessness in the County. The new Board began meeting in December 2017 and has been tasked with updating the CoC's Plan to End Homelessness and shifting the Coordinated System of Homeless Services (CSHS) to achieve improved outcomes for people experiencing homelessness through a more standardized Coordinated Entry System (CES).

The CoC was awarded FFY15 and FFY16 HUD Planning Grants to update the Plan to End Homelessness (2010) to reflect accomplishments made and set a path to ending and preventing homelessness. Using the FFY15 and FFY16 HUD Planning Grants, DCRS created a temporary position that was hired in April 2018 to review existing Plan documents, conduct best practice research, interview community stakeholders, and consolidate the information into an updated Plan. It is the CoC's goal to focus on priority populations, and make any homeless episode rare, brief and non-recurring. The research and planning process will include annual benchmarks to ensure County-wide efforts are on track to meet local, state and national goals.

In 2017, HUD set a January 2018 goal for CoC's to standardize their CESs, to develop a "*process designed to coordinate program participant intake assessment and provision of referrals*." The goals of CES are: improve ease of access to resources, improve fairness, increase the efficiency of the crisis response system, prioritize those most in need of assistance, and provide information on system needs and gaps. The CoC is focusing on the four tenets of CES: Access, Assess, Prioritize, and Refer.

HMIS and CoC Lead Agencies are also being tasked with measuring success of the system in place to address homelessness through System Performance Measures (SySPM) tracking and reporting. Through two primary system efforts, Homeless Prevention and Rapid Rehousing, we will track our ability to prevent households from becoming homeless, and assist others to become quickly and stably housed. **The SySPM are**: 1). Reduce the length of time homeless, 2). Reduce returns to homelessness, 3). Reduce the number of homeless persons, 4). Increase job and income growth, 5). Reduce first time homeless, 6). Stabilize people in homeless Category 3 (N/A for Howard County), and 6). Successful

placement and retention of housing.

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

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

The CoC measures its ability to reach out to homeless persons and address their needs through SySPM 1: *Reduce length of time homeless*. One of the best ways to reduce the time persons are literally homeless is to increase Street Outreach capacity. Through the CES, the CoC is focusing on improved methods to reach out to homeless persons: adding persons to a By-Name list for placement into housing.

The following have been consistent strategies and actions the CoC has taken to ensure unsheltered persons are connected to services and housing:

1) State-funded Emergency Solutions Grant (renamed the Homeless Solutions Grant Program) from the Maryland Department of Housing and Community Development, funds a part time Street Outreach position that is tasked with ensuring persons who are living in places not meant for human habitation are engaged and connected to community-based services, including the By-Name list for housing opportunities.

2) The Day Resource Center located in North Laurel, Maryland, a program of Grassroots Crisis Intervention Center, Inc., is open three days a week, for four hours a day, providing hot showers, meals, laundry facilities, computers, doctor visits, clothing closet, food pantry and a mailing address for the unsheltered. Once literally homeless persons are identified, a VI-SPDAT is completed and they are added to the By-Name list.

2) Point in Time (PIT) events also reach out to homeless persons.

1. 2017 HUD PIT: locations across the County issued surveys, gift cards, backpacks, and meals to count number of unsheltered persons that day. Groups of street surveyors also conducted outreach.
2. 2018 and 2019 HUD PIT: multiple street outreach teams canvassed the County and engaged/conducted surveys with persons living outside, in encampments, in cars and at partner agencies.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through the Plan, the CoC will focus on the crisis response system needs in the County, standardize access to emergency shelter beds, and help people become quickly and stably housed. The CoC will take

the following strategies and actions to address the emergency sheltering and transitional housing needs of homeless persons through the CES.

1. Standardize Access to the Crisis Response System
2. Standardize Assessment for the Crisis Response System
3. Prioritize Placement into Emergency Shelter and Permanent Housing Interventions
4. Make timely Referrals

Over the next year, we will measure our success in addressing the emergency sheltering and transitional housing needs of homeless persons through the following SySPM, to help people become quickly and stably housed.

Programs Meeting Emergency Shelter Needs

1. Grassroots Crisis Intervention Center, Inc., is the primary emergency shelter provider, operating the Family and Men's shelters, the Day Resource Center, the Motel Program (overflow shelter), and Cold Weather Shelter Programs from November through April annually.
2. HopeWorks of Howard County Inc., operates a Safe House emergency shelter, safe houses and rapid rehousing. Due to the confidentiality requirements, they do not enter into HMIS but they share aggregate numbers of households served, exits to housing, and types of services provided. HopeWorks just began their fourth cycle of Rapid Rehousing for households who are homeless due to domestic violence to quickly become safely housed.
3. The Department of Corrections is slated to open a four-bedroom house for persons leaving detention. The Department of Corrections also just began their fourth funding cycle of Rapid Rehousing for homeless households with a forensic background to quickly address their housing needs, and assist in lowering barriers to becoming permanently housed.

There are no transitional housing programs in the CoC.

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

In order to quickly house key subpopulations, the CoC has established the following target populations:

1). Unsheltered minors (unaccompanied or in families); 2). Chronic Unaccompanied Youth, Veterans; 3). Chronic Unaccompanied Youth; 4). Chronic Families, Veterans; 5). Chronic Families; 6). Chronic Singles, Veterans; 7). Chronic Singles; 8). Non-Chronic Unaccompanied Youth, Veterans; 9). Non-Chronic

Unaccompanied Youth; 10). Non-Chronic Families, Veterans; 11). Non-Chronic Families; 12). Non-Chronic Singles, Veterans; 13). Non-Chronic Singles

The following strategies and programs are in place to meet the needs of these subpopulations:

1) The CoC has a By-Name list for all persons experiencing homelessness. This list assists in ranking households according to the prioritization set by the CoC (above) and will be used to estimate the number of permanent housing programs needed.

2) Grassroots Crisis Intervention Center operates an emergency shelter for families and singles in Howard County. The CoC is actively working on strategies to decrease the length of stay in shelter by shifting to low-barrier and housing focused shelter, and linking shelter residents to rapid rehousing opportunities.

3) Permanent Housing.

Permanent Supportive Housing. 1). The Howard County Housing Commission (Commission) in partnership with VOA of the Chesapeake opened a 35-unit efficiency apartment building to rehouse chronically homeless persons in Fall 2017. Placements were taken from the CoC's By-Name list. The apartments are subsidized with Project Based Vouchers through the Housing Choice Voucher program. 2). Permanent Supportive Housing for Persons with Disabilities. The CoC commits all turned-over permanent supportive housing units to those who are chronically homeless. In the FFY17 CoC Competition, one new project (2 units) was awarded through the BONUS opportunity. In the FFY18 CoC Competition, no new projects were awarded through BONUS or new Project opportunities.

Rapid Rehousing: Funded for FFY17, an ESG grant was awarded to Howard County through the State's DHCD for Rapid Rehousing. This program will target homeless households that need medium-term rental assistance and case management. Three agencies will be operating the Rapid Rehousing program: Howard County Department of Corrections, HopeWorks of Howard County, and Bridges to Housing Stability, Inc. the State Department of Housing and Community Development expanded and revised their ESG grant and combined it with State dollars to support the same components as ESG. Beginning July 2018, Howard County was provided additional Rapid Rehousing funding that modeled the same programs operated under ESG FFY17.

Local Funding: Another strategy to reduce homeless episodes and reduce returns to homelessness is through flexible financial assistance provided through local grant funds. CoC case management partners can provide move-in funds, security deposit & 1st month's rent, as well as shallow rental assistance for literally homeless persons to gain access to permanent housing. The United Way of Central MD, in collaboration with the CoC, funds a "Shelter Diversion" program to quickly rehouse families with children. Through the Housing Choice Voucher Program at the local Public Housing Authority, the Howard County Housing Commission, approximately 15 vouchers are provided to the CoC to rehouse

literally homeless households.

Prevention: Local Funding Prevention is a strategy for households to avoid returns to homelessness and is funded through flexible financial assistance (local grants) and State HSP grants. CoC case management partners can provide short and medium-term rental assistance to allow households to stay in their unit.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

1) State Department of Human Resources/Department of Social Services.

a) Foster Care focuses programming on youth in their custody who are not residing in their court-ordered placement and follows the State policy for out-of-home placement as found at COMAR Citation: 07.02.11.04.

b) There are discharge policies on file for youths exiting systems of foster care to avoid homelessness.

2) The Howard County Department of Corrections Reentry Program.

a) This program is in place for offenders leaving local detention to “re-enter” the community. A variety of services are provided including case management, connection to mainstream resources and housing.

b) If a person meets HUD’s definition of homeless they are eligible for programs in the CoC.

c) The Reentry Program operates a Rapid Rehousing program through ESG FFY16 and FFY17. This allows persons exiting detention to have housing options and not be discharged into homelessness, if eligible per HUD’s definition.

d) The Department of Corrections is opening an emergency shelter for persons with a forensic background and a history of literal homelessness to avoid unsheltered homelessness and ease the rehousing process. This will also close a gap for persons who are unable to access shelter at Grassroots due to types of criminal histories.

3) The Howard County Department of Community Resources and Services (DCRS), CoC Lead Agency. DCRS funds numerous non-profits in Howard County coordinating activities to ensure persons exiting correctional facilities, foster care, and health care facilities are being stabilized and provided as many

services as possible, so that homelessness does not occur.

4) Community Partners.

a) Howard County General Hospital, the Local Children's Board, and the Office of Workforce Development work closely with homeless providers to decrease homelessness incidents.

b) It is the goal of the CoC to expand collaboration and coordination with all institutions in Howard County to decrease any exits to homelessness in the community.

Discussion

In the CoC FFY 2014, FFY15 and FFY16 Competition, the CoC was awarded Planning Grants to update the Plan to reflect accomplishments made. In 2018, the Collaborative Applicant hired a full-time Temporary staff member to review existing Plan documents, conduct best practice research, interview community stakeholders, and consolidate the information into an updated Plan. It is the goal to make any homeless episode rare, brief and non-recurring. The research and planning process will include annual benchmarks to ensure County-wide efforts are on track to meet local, state and national goals. The Plan will include timelines for ending homelessness in Howard County, set annual goals for target populations and ending and preventing all types of homelessness. The Plan will incorporate the changes to the CES and use the SySPM to analyze and track success towards meeting the goals of the Plan. The CoC will continue to create and build upon strategies to address the needs of the homeless, including:

1) Reaching out to homeless persons and assessing their needs

2) Addressing the emergency and transitional housing needs of homeless persons

3) Making transitions to permanent housing and independent living: shortening homeless episodes, moving quickly into affordable housing, and addressing recidivism (preventing formerly homeless persons from future homeless episodes)

4) Discharge policies to avoid homelessness upon exiting publicly funded institutions, systems of care, or who are receiving public or private human services assistance.

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

Introduction:

The Howard County Human Rights Law states that Howard County shall foster and encourage growth and development so that all persons have an equal opportunity to pursue their lives free of discrimination. The ordinance states it is unlawful to discriminate against a person based on: race, creed, religion, disability, color, sex, national origin, age, occupation, marital status, political opinion, sexual orientation, personal appearance, familial status, and source of income. Potential housing, law enforcement, employment, public accommodations, and financing complaints are accepted by the Howard County Office of Human Rights.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Attached in the unique appendix section is the County's RAI strategy to remove or ameliorate the barriers to affordable housing.

Discussion:

The County will fund the following affordable housing projects with FFY 2019 CDBG funds:

- CD-19-02 – Fair Housing Activity - Analysis of Impediments
- CD-19-03 - Fair Housing Activity (Testing)
- CD-19-11 – Rebuilding Together Homeowner Rehabilitation
- CD-19-09 – Bridges to Housing Stability
- CD-19-10 – Bridges to Housing Stability Rehabilitation
- CD -19-14 - Community Action Council Housing Stability
- CD-19-21 - Bridges to Housing Stability - Housing Stability
- CD-19-22- Howard County Housing Commission - Housing Stability

AP-85 Other Actions – 91.220(k)

Introduction:

Howard County has developed the following actions to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public, private housing, and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Despite the County's best efforts and efforts of service providers, there continue to be obstacles to meeting the underserved needs in Howard County. Some of these obstacles are the high cost of housing; the gap between incomes and housing costs; high cost of developable land; special needs populations lacking housing options; and the cycle of poverty. Under the FFY 2019 CDBG Program, the County will take the following actions to better address underserved needs:

- Continue to leverage its financial resources and apply for additional public and private funds
- Continue to provide financial assistance for new housing development and rehabilitation
- Continue to provide funding for public service activities
- Continue to provide public facility improvements

Actions planned to foster and maintain affordable housing

The County will fund the following affordable housing projects with FFY 2019 CDBG and HOME funds:

- CD-19-02 – Fair Housing Activity (Analysis of Impediments)CD-19-03 - Fair Housing Activity (Testing)CD-19-06 – Living in Recovery Facilities ImprovementCD-19-07 – Help End Homelessness Facilities ImprovementCD-19-09 – Bridges to Housing StabilityCD-19-10 - Bridges to Housing Stability RehabilitationCD-19-11 - Rebuilding TogetherCD -19-14 - Community Action CouncilHO-19-15 – iHomes Inc. AcquisitionHO-19-16 - Future Affordable Housing DevelopmentHO-19-17 – Downpayment and Closing Cost Assistance

Actions planned to reduce lead-based paint hazards

When the County provides assistance to homebuyers or homeowners for homes 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.

Actions planned to reduce the number of poverty-level families

Based on 2008-2012 ACS data, approximately 4.4% of the County's residents live in poverty, which is less than the State of Maryland's poverty rate of 9.4%. Female-headed households with children are particularly affected by poverty at 15.9% and 5.0% of all youth under the age of 18 were living in poverty. The County's goal is to reduce the extent of poverty by actions the County can control and through work with other agencies and organizations. During this program year the County will fund the following activities with FFY 2019 CDBG and HOME funds to reduce the number of poverty-level

families:

- CD-19-02 – Fair Housing Activity (Analysis of Impediments)CD-19-03 - Fair Housing Activity (Testing)CD-19-06 – Living in Recovery Facilities ImprovementCD-19-07 – Help End Homelessness Facilities ImprovementCD-19-08 – The Arc of Howard County Facilities ImprovementCD-19-09 – Bridges to Housing StabilityCD-19-10 - Bridges to Housing Stability RehabilitationCD-19-11 - Rebuilding TogetherCD -19-14 - Community Action CouncilHO-19-15 – iHomes Inc. AcquisitionHO-19-16 - Future Affordable Housing DevelopmentCD-19-21 - Bridges to Housing Stability - Housing StabilityCD-19-22 - Howard County Housing Commission - Housing Stability

Actions planned to develop institutional structure

Howard County has a productive working relationship with many community partners in the implementation of the County's housing and community development projects. The County's Department of Housing and Community Development coordinates activities among the public and private agencies and organizations in the County. This coordination will ensure that the goals and objectives outlined in the FY 2016-2019 Four Year Consolidated Plan will be effectively addressed by more than one entity. The following entities will carry out the FFY 2019 annual goals and objectives:

- Howard County Housing Commission – manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing in mixed income communities.
- Howard County Department of Community Resources and Services (DCRS) – oversees the County's CoC and administers the County's aging and disability services.
- Bridges to Housing Stability – will provide housing to a homeless family.
- Rebuilding Together – will provide housing rehabilitation to qualified owner occupied households
- Grassroots Crisis Intervention Center – will provide supportive services to homeless persons.
- Hope Works – will provide transitional housing.
- Community Action Council – will provide housing stability assistance to prevent eviction.

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

The County's Housing and Community Development Department will continue to act as a coordinator between housing and social service activities provided by the County and activities provided by the Housing Commission, the Continuum of Care, private and non-profit housing providers, and social service agencies to address the housing and community development needs of the County. The Department will accomplish this coordination by continuing to attend outside agency planning meetings, provide technical assistance for funding options and program compliance, participate in

planning initiatives, and act as network connection between entities.

Discussion:

The Department of Housing and Community Development has the primary responsibility for monitoring the County's Consolidated Plan and Annual Action Plan. The Department maintains records on the progress toward meeting the goals and the statutory and regulatory requirements of each activity. The Department has a monitoring process that is focused on analyzing and comparing projects and activities based on program performance, financial performance, and regulatory compliance. The accomplishments of the FFY 2019 CDBG and HOME activities will be reported in the FFY 2019 Consolidated Annual Performance and Evaluation Report and be used as a basis for future funding decisions.

Program Specific Requirements

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

Introduction:

Howard County has done a Substantial Amendment to our FFY2019 Annual Action Plan in response to **$770,356.00 CDBG-CV funding** the County is receiving, which will be added to FFY2019 annual allocation of CDBG funds in the amount of **$1,246,937** and an anticipated $10,778.8 in program income for the amended FFY2019 budget of **$2,028,071.81**

The County had also anticipated it would receive an annual allocation of HOME funds in the amount of $422,239, anticipates $30,764.90 in program income, and will match $105,559.75 (25% required match less administration and CHDO set aside) for a total FFY 2019 budget of $558,562.75. Since the County receives CDBG and HOME allocations, the questions below have been completed as applicable.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	10,779
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**10,779**

Other CDBG Requirements

1. The amount of urgent need activities	0

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 80.00%

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

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

   See attached HOME Policies and Procedures.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   The County (in order to ensure affordability) is required by the HOME program to impose either resale or recapture requirements, at its option. Howard County has previously used the recapture provision and will continue to do so throughout the FFY2016-2019 Consolidated Plan period. 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.

   For additional information, see attached HOME Policies and Procedures.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   The County (in order to ensure affordability) is required by the HOME program to impose either resale or recapture requirements, at its option. Howard County has previously used the recapture provision and will continue to do so throughout the FFY2016-2019 Consolidated Plan period.

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.

For additional information, see attached HOME Policies and Procedures.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   Howard County will not use HOME funds to refinance existing debt.

Howard County has done a Substantial Amendment to our FFY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. Program funds which were added to FFY2019 annual allocation of CDBG funds in the amount of $1,246,937 and an anticipated $10,778.8 in program income for the amended FFY2019 budget of $2,028,071.81

The County will budget $184,080.10 for general administration and $66,400 for Fair Housing activities for a total Administration and Planning Budget of $250,480.10 (12%).

The balance of funds ($1,777,591.71) will be allocated to activities which principally benefit low- and moderate-income persons in the amount of $1,777,592.71 (88.0%) and $0 for the removal of slums and blight (0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities $361,936.01 (18.0%), Housing activities $472,170.78 (23.0%), and Public Service activities $943,484.92 (47.0%). **Public Services - The CARES Act Waived the 15% Public Service Cap for FFY19 & FFY20.**

The County makes applications available to non-profits, for-profit agencies, and other public agencies/organizations for CDBG eligible funded activities. A percentage of the County's Community Development Block Grant (CDBG) funds are awarded on a competitive basis to applicants of eligible activities. The applications are reviewed by the Department of Housing and Community Development and finally submitted to the Howard County Council for approval.

Attachments

Citizen Participation Comments

FFY2019 AMENDMENT

LETTER TO HUD

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

July 8, 2020

Ms. Evelyn Cartagena
CPD Representative
U.S. Department of Housing and Urban Development
Bank of America Building, Tower II
100 S. Charles Street, Suite 500
Baltimore, MD 21201

Re: Community Development Block Grant (CDBG) FFY19 Action Plan Amendment - Howard County, Maryland

Program Years: FFY2019

Dear Ms. Cartagena:

In accordance with the Citizen Participation guidelines established by HUD, outlined at 24 CFR Part 91.505(c)(1) and Howard County's Citizen Participation Plan, this letter is to notify your office of recent program amendments involving Community Development Block Grant funds (CDBG) funds that have been reprogrammed as detailed below:

CDBG Amendment
Howard County did a Substantial Amendment to our FFY2019 Annual Action Plan to in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan, to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020 the County submitted a Waiver Letter requesting the use of those waivers allowing for the virtual town hall meetings and the **5-day public comment period.**

Howard County conducted three Virtual Public Needs Hearing on April 30, May 5 and May 7, 2020. The invitation was emailed to 138 stakeholders from the Nonprofit Stakeholder list maintained at Department of Housing and Community Development. An application for this funding was released on May 1, 2020 for Nonprofits to apply to the County funding to respond to the COVID-19 struggles many of our low-income residents have seen since the state of emergence shut down our economy.

The new activities are described below:

Bridges to Housing Stability, a 501 (c)(3) nonprofit, will use CDBG funding to provide short-term rent payments up to 3-months for low and moderate-income Bridges' residents that have had COVID-19 related job loss resulting in the household's inability to pay their rent. **Award Amount $257,643.00**

The Howard County Housing Commission (HCHC) is a public body corporate and politic, and the public housing authority for Howard County. HCHC will use CDBG funding to provide short-term rent payments up to 3-months for low and moderate-income Commission residents that have had COVID-19 related job loss resulting in the household's inability to pay their rent. **Award Amount $512,713.00**

Howard County had the draft version of the Amended FFY2019 Annual Action Plan on the County's website beginning Thursday, June 4, 2020 on the Housing webpage of the County's website at www.howardcountymd.gov under "Departments". **All comments must be received by June 9, 2020 at 11:59.99 PM.**

Written comments were directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at 9820 Patent Woods Drive, Suite 24, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov.

For your reference, I have enclosed a copy of the publication for the CDBG program amendments. If you have questions or require additional information, you may contact me at your convenience by phone at 410-313-6324 or by email at emeadows@howardcountymd.gov .

Sincerely,

Elizabeth Meadows
Chief, Community Planning and Grants
Enclosure(s)

cc: Charles Halm
Kelly Cimino
Nkechi Animashaun

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6878877

Printed: 5/19/2020 8:56:25 AM

* Agency Commission not included

GROSS PRICE * : **$271.55**

PACKAGE NAME: CNG Howard County Times Single

Product(s): Howard County Times, classified.MDDC.com_CNG
AdSize(s): 2 Column (8TAB)
Run Date(s): Thursday, May 21, 2020
Color Spec. B/W

Preview

Public Notice and Notice of Public Hearing

Howard County Department of Housing and Community Development
PROPOSED AMENDMENTS TO ANNUAL ACTION PLANS

May 21, 2020

In accordance with 24 CFR Part 91 of the federal regulations governing the Consolidated and Annual Action Plans and Howard County's Citizen Participation Plan, notice is hereby given that the Howard County Department of Housing and Community Development (DHCD) is proposing to amend its FFY18 and FFY19 Annual Action Plans.

Howard County is beginning the process of making a Substantial Amendment to our FFY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020, the County submitted a Waiver Letter to HUD requesting the use of those waivers allowing for the virtual town hall meetings and the **5-day public comment period.**

Howard County conducted three Virtual Public Needs Hearing on April 30, May 5 and May 7, 2020. The invitation was emailed to 135 stakeholders from the Nonprofit Stakeholder list maintained at the Department of Housing and Community Development. An application for this funding was released on May 1, 2020, for nonprofits to apply to the County for funding to respond to the COVID-19 struggles many of our low-income residents have seen since the state of emergency began. The application due date is May 22, 2020 at 5:00 PM.

The proposed amendments also involve the reallocation of $173,876.04 in FFY18 CDBG Program funds to allow the County to utilize prior year's projects/activities which have unobligated balances and to re-program funds to other approved projects in order to fulfill the County's obligation of creating affordable housing and community development.

The new activities are described below:
The United Way of Central Maryland, a 501 (c) (3) non-profit in Howard County, will use CDBG funds in FFY20 to renovate a 9,000 square foot space in Columbia for use as the new Family Center to meet the critical need for affordable, quality childcare in Howard County. Through this project, United Way is building the first non-profit, child-care center.
Award Amount $86,938.02

Humanim, Inc., a 501(c)(3) non-profit in Howard County, will use CDBG funds in FFY20 to provide renovations at their Gerwig building including a mock apartment for client training (for community integration); renovation of all bathrooms and the construction of a changing room with an

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6678877

Printed: 5/19/2020 8:56:25 AM

* Agency Commission not included

GROSS PRICE * : **$271.55**

PACKAGE NAME: CNG Howard County Times Single

standards. The renovations also include painting the entire interior, updating electrical and duct work, replacing doors, installing new flooring throughout the building, and repairing and staining flooring in the back portion of a facility that supports many activities and programs for persons with intellectual and developmental disabilities. **Award Amount $88,938.02**

The draft version of the Amended FFY2019 Annual Action Plan will be posted on the County's website beginning Thursday, June 4, 2020, on the Housing webpage at www.howardcountymd.gov under "Departments". **All comments must be received by June 9, 2020 at 11:59.99 PM.**

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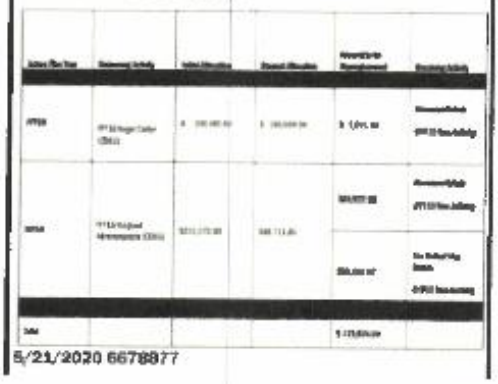

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Order ID: 6676898

Printed: 5/19/2020 9:02:44 AM

* Agency Commission not included

GROSS PRICE * : **$248.33**

PACKAGE NAME: CNG Columbia Flier Single

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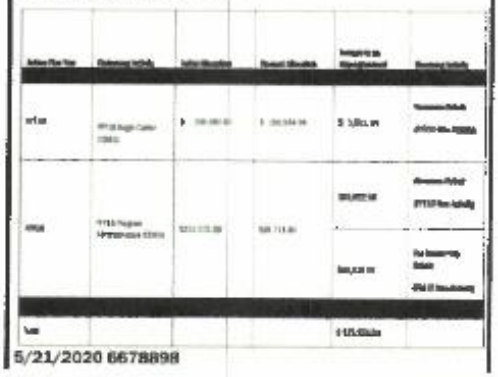


5/21/2020 6678898

CDBG AMENDED

BUDGET PAGE

AND

HOWARD COUNTY LEVERAGE

Howard County
HOUSING

CDBG Program Federal Fiscal Year 2019 Use of Funds - *CARES Act Amendment Budget*

Entitlement for FFY2019	$1,248,937.00
Estimated Program Income For FFY2019	$10,776.81
Prior Year Resources, FFY2018	$0.00
CDBG-CV Resources	$770,366.00
Entitlement + Estimated Program Income	$2,028,071.81
Public Service Cap = 15% - The CARES Act Waived the Public Service Cap for FFY19 & FFY20	$0.00
Administration & Planning Cap = 20% of Entitlement Including PI for FFY2019	$405,614.36

Action Plan Project Descriptions

Administration and Planning	FFY 2019 Funding Amount
Program Administration	$166,780.10
Regional Fair Housing Coordinator	$6,400.00
OFC Fair Housing Activity	$60,150.00
Total Planning & Administration	$250,480.10
Public Facilities	
Roger Carter Recreation Center Re-development*	$280,000.00
Emergency Public Facilities*	$24,000.00
Living In Recovery Facilities Improvement	$24,026.71
Into Eve Homelessness - Rehab	$15,000.00
The Arc of Howard Co. Facilities Improvement	$95,507.30
Total Public Facilities Programs	$363,534.01
Housing Activities	
Bridges to Housing Stability - Acquisition	$249,090.18
Bridges to Housing Stability - Rehab	$48,907.30
Rebuilding Together / Home Owner Rehab	$171,173.30
Total Housing Programs	$472,170.78
ublic Services - The CARES Act Waived the 15% Public Service Cap for FFY19 & FFY20	
Bridges to Housing Stability - Short-term Rental Subsidies - CDBG-CV	$257,648.00
Howard County Housing Commission - CDBG-CV	$512,713.00
Grassroots / Route One Day Resource Center	$69,999.19
Hope Works / Transitional Housing	$61,528.43
LAC / Housing Stability	$98,807.30
Total Public Services	$943,695.92
Total	$2,028,071.81 $2,028,071.81 $0.00

Maximum Public Service Cap @ 15% - The CARES Act Waived the Public Service Cap	$0.00	
Public Service Funding =	$943,695.92	
Maximum Administration and Planning Cap @ 20% =	$405,614.36	
Administration and Planning Funding =	$250,480.10	
Net Entitlement + PI Estimated	$2,028,071.81	$0.00
Total of All Activities	$2,028,071.81	

Notes

* Multi-year Commitment

	A	B	C	D	E	F	G	H
1	**Rent Subsidies Open to Public**							
2	**Organization**	**AMI %**	**Households Served**	**Notes**	**Amount**	**Adjustment %**	**Funded Amount**	**Funding Source**
3	Action Council	0-80%	350	3 months rent subsidies eviction prevention & utility assistance	$ 630,000.00	21%	$ 503,250.00	County
4	The United Way	0-80%	40-50	2 months rental subsidies	$ 50,000.00	25%	$ 37,500.00	County
5	Grassroots Family & Childrens	0-80%	30-40	Rent subsidies and wrap around	$ 100,000.00	25%	$ 75,000.00	County
6	Services	0-80%	40	services Rent subsidies for foreign born households, average size 4-6	$ 131,760.00	25%	$ 98,820.00	County
7	EJRN	0-80%	65	members	$ 100,000.00	25%	$ 75,000.00	County
8	**Rent Subsidies for Properties Owned**							
9	Housing Stability	0-80%	175	Rent subsidies and eviction prevention and healthy households kits for residents in all 3 Bridges programs	$343,525.00	25%	$ 257,643.00	CDBG-CV
10	Howard County Housing Commission	0-80%	200	3 months rent subsidies for Commission properties	$ 695,544.00	26%	$ 512,713.00	CDBG-CV
11	Volunteers of America Chesapeake	0-30%	34 SRO	3 months rent for Leola Dorsey residents	$11,592.00	10%	$ 10,430.00	County
12								
13								
14							$ 770,356.00	CDBG-CV Amount
15							$ 800,000.00	*Howard County Leverage*
16							$ 1,570,356.00	Total Rental Amount
17								

FFY19 AMENDMENT

CITIZEN PARTICIPATION

BACKUP

Howard County Community Planning and Grants Division
COVID-19 Needs Hearings Notes
WebEx Conference Calls

Dates & Times of Calls

1. Thursday, April 30, 2020 – 1:00 PM – 3:00 PM
2. Tuesday, May 5, 2020 – 10:00 AM – 12 Noon
3. Thursday, May 7, 2020 – 2:00 PM – 4:00 PM

Framework of Call:

- Name and the organization you represent.
- What are the struggles your clients are identifying to your organization since the COVID-19 State of Emergency was declared in mid-March?
- What is the significant impact this shut-down has had on your organization?

Thursday, April 30, 2020 Hearing Notes – ***All comments were accepted***

Theresa Thomas / Hilda's Place Behavioral Health Services

- Telehealth treatment is very difficult with clients that are served because many only have a flip phone, not a smartphone that would give them access through Zoom and other apps such as WhatsApp
- Because of COVID-19 Hilda's Place has seen a drop in the number of persons trying to access services
- Clients that they serve have a lot of medical issues
- Need volunteer drivers to get clients to medical appointments
- Need additional personal protective equipment (PPE)

Gayle Burns / American Red Cross

- There have been a few different needs since COVID-19
- COVID-19 practices have been put in place for blood drives – social distancing, taking temperature of each person donating at entryway
- Have begun to see blood donations increase
- Disaster responses that have had to be implemented to respond to COVID-19, need to invest in technology, hotel space instead of shelter due to social distancing requirements in place
- Increased expenses due to needing to use motel rooms instead of a shelter setting.

Sue Hunt / The Salvation Army

- At the beginning of the outbreak, the number of calls for service dropped

- Food insecurity calls increased
- Increase in calls for eviction prevention help
- Agency donations are down, and staff time is limited
- During the 3rd week of emergency, there continues to be a need for food and rental assistance

Con Manning / Hope Works

- Biggest impact on the shelter has been to have to move impacted families to motels therefore increasing operating costs
- Rapid rehousing (RRH) clients – all had been employed pre – COVID-19 but have all lost their jobs due to shut-down of the economy
- Shelter staff are paid over-time wages which adds additional operational expenses not in the initial budget
- Implemented telemedicine for use by residents
- Hotline has not seen an increase yet, but Hope Works anticipates that there will be an increase in domestic violence cases the longer households are required to shelter in place.

Jen Broderick / Bridges to Housing Stability

- Currently, clients have difficulty affording food and basic necessities
- Hard to get personal protective equipment for both employees and clients
- Hard to find hand sanitizer,
- Online price gauging is prevalent ($12.00 for a bottle)
- Starting to see clients not able to make rental payments due to job loss or reduction in hours. Anticipates May and June to see an increase in delinquent rent payments.

Ayesha Holmes / Grassroots Crisis Intervention

- Hotline anticipating an increase in calls for rental assistance
- Low income workers and those in the gig economy are particularly impacted by the shelter in place order and subsequent economy
- Once economy opens back up rental assistance and eviction prevention will be critical to keep people housed
- Care for literally homeless is needed
- More COVID-19 assistance for homeless to place them in motels for social isolation
- Many of Grassroots staff are in their 60s with underlying health conditions / may cause a staff shortage if people get sick with the virus from exposure from residents.

Tuesday, May 5, 2020 Hearing Notes - ***All comments were accepted***

Del Scruggs / Community Action Council

- Runs the Head Start Program in Howard County at four Center locations

- Have Eviction Prevention Program; Energy Program, and the Howard County Food Bank
- The Food Bank has needed to add two Pop-up Food Pantries per week to deal with residents that cannot get to their main location to deal with the increased food insecurity since COVID-19 economy shut-down.
- 126 Head Start students are being impacted by the COVID-19 shut-down by loss of the learning opportunity as the program is shut-down,
- Additionally, Head Start families are experiencing food insecurity
- Food Bank is over run with Howard County residents needing help with food.
- CAC is partnering with Neighbor Ride and anyone who is already a CAC client can receive a food delivery
- Plenty of volunteers to help at the Food Bank
- The hospital has supplied masks for volunteers
- CAC has a need for cleaning supplies to sanitize all areas of the Food Bank
- With restaurants only doing take-out CAC has seen a big reduction in food donations

Grace Morris / Heritage Housing Partnership

- Main concern at their two HUD project based properties (Shalom Square with is 50 units for senior/disabled and St. Matthew House which is 15units for the physically disabled and 2 "market" rate units) has seen food insecurities which the resident services coordinator has been working with a variety of resources in the county to bring food and meals to our residents
- Main concern with the residents at Oakland Place who are not in MIDU units or on a voucher. Those are people who have been working and running small businesses and now they are not open for business. Heritage is working with them now to agree that when everyone is on the other side of the pandemic that they will come up with a mutually agreeable solution for repaying the rent owed. Right now, Heritage has 4 families out of 12 units that facing such challenges. Heritage is giving the households until May 15th to get paperwork in for the agreement.
- In the meantime, Heritage needs to pay a monthly mortgage payment and were trying to escrow for taxes and insurance which they cannot do at this time due to lack of funds. So, the payment will have to be covered by Heritage out of a rainy-day fund which has shrunk dramatically due to the stock market fluctuations. The longer this lasts the bigger the hole these renters are going to be in and the harder for them to climb out of it. As of last week, several of them had not received unemployment or the stimulus check which in Howard county will not take them far.

Mike Mitchell / Foreign-Born Information and Referral Network (FIRN)

- FIRN is seeing food insecurity as the most prevalent need for the clients
- There is fear of among the clients they serve that the use the food bank will incur a public charge. Even though the Howard County Food Bank does not charge for the food, immigrant residents are afraid of going there. FIRN has brought in food to try to help

- The second issue is housing. With job loss for many in the restaurant and service industries, there is fear by many that they will lose their housing.
- Overcrowding is prevalent in a lot of immigrant households; in one household they serve there are 12 people living in a 2-bedrooom apartment.
- New program FIRN has started is one called "Pay it Forward," which are 0% loans that clients can apply for to cover needs that household is struggling to cover the cost of. When the funds are paid back they go back into pool to be loaned out.
- Long-term concern is Employment – the ability to get these residents who have lost their jobs back into the workforce.
- FIRN has seen increased requests for them to provide interpretation services
- On an organization level, working remotely puts a strain on service delivery.

Bill Emshwiller / Living In Recovery Howard County (LIR)

- Housing for men and women who are in the recovering stage of their addiction to drugs or alcohol.
- LIR has 18 beds
- All residents come in through a structured treatment program, either an out-patient or an in-patient program.
- At the time of COVID-19, all residents are either taking unemployment or working.
- Due to COVID-19 any vacant beds have had to remain open, because of the physical closeness of residents, and not knowing if the incumbent is coming from a COVID negative space
- LIR is not set up with the ability to accept COVID-19 positive persons
- Due to the empty beds, there is a deficit in the rent collection which is done of a weekly basis. With full compacity of 18 beds occupied, on a good month, rent collection only accounts for 50% of the expenses on a monthly basis.
- Had to go into the "Rainy Day Fund" to support the balance of monthly expenses
- Applying to several other programs for funding, but haven't heard back yet
- Have had to re-arrange the budget, to shift money into the expenses that are running at a deficit due to the lack of income coming in.
- Fortunately, no one has contracted the virus internally and residents are able to conduct our services to our residents remotely, AA / NA sessions done online.
- Last week, because of the deficit, the Recovery Manager began to review applications again to fill the vacant beds. Residents will be from in-patient facilities that operate like LIR does, the referral person will be in safe condition to come into one of our homes.

Yemi Adeyinka / Solomon's Porch Worship Center

- My Father's Barn is name of the food back, a non-profit organization striving to eliminate hunger in the Jessup, Laurel and Columbia areas of Howard County through food distribution, education and advocacy (pulled from their website).

- The food bank program receives food through the Maryland Food Bank and through donations from various food sources.
- Donations of quality winter coats are made and dropped off at a local shopping complex
- Since COVID-19 the resident are not asked for identification to reduce the shame of having to ask for food
- Have seen an increase in food insecurity among residents requesting help
- The organization has increased their outreach to provide information about the food program
- Need more resources to respond to the increased demand.

Thursday, May 7, 2020 Hearing Notes - ***All comments were accepted***

Cindy Parr / The Arc of Howard County

- Largest concern from our perspective from people we are supporting with disabilities is that they don't understand why they can't go out into the community having the type of services (integrated) we are supposed to be providing them
- Not getting out, can't see their families. their families can't see them
- Can't see their friends, their friends can't see them
- Many that had been employed have lost their jobs
- Can't understand the very things that we are all supposed to be doing, like social distancing the fact that you can't get within 6 feet of each, can't give hugs
- Can't go the various day programs
- They don't understand why they have to wear a mask. They don't like wearing a mask.
- Much of the struggles for us is are central to how our individuals are reacting to the situation and how we are trying to help cope with it
- On top of that dealing with people of have tested positive for COVID-19 in our residential setting, going through the process of getting them quarantined, stop working getting someone to replace them
- None of the clients have tested positive for COVID-19 / but staff have though
- Had to discontinue the Day Program, which is a fee for service program, so the Arc is also experiencing a loss in income, as thy can't bill if services are not in session.

Peter Engel / Howard County Housing Commission

- Clients clearly are going to be having economic problems, nationally every 1-5 persons have lost their job
- Commission clients, lower income end of the populations are more vulnerable of losing their jobs
- Loss of jobs can jeopardize being able to pay rent, food issues and not being able to pay utilities, medicines and everything else due to that loss of income

- They have been talking to property management companies regarding the reduction in rent, but have seen a lot of food insecurity, we heard about it at one property, but it is just a matter of time it is going ramp up
- Some of it depends on how many people are going to be able to get unemployment and how much will they receive
- Much of the staff is working remotely, which has an immediate impact on delivery of services,
- If our rent collection is down, subsequently our revenues are down
- Two main programs are operated by the Housing Commission - HCV Program which comes along with HUD funds, but for the most part the fees have not kept pace with the costs of programs. That is not going to change much.
- The other place we make money to pay staff and rent and to keep the lights on, and to pay for operating expenses for our properties is through rent collection. If rents are down property owners can't pay their utilities, can't pay operating and can't always pay their debt.
- That starts to risk the chance of foreclosures on properties. Causes a chain reaction if people can't pay rent.
- Maintenance on properties decreases, bank foreclosures can occur and chaos into the rental housing market, which eventually hurts the banking industry.
- In April 1-30 day delinquencies are about 29% higher than they were in March. Though that is not that bad, in March it was at 9% of our total potential collections to 12% total potential collection which becomes a real number. Most property mangers anticipate it is going accelerate substantially. Don't have numbers for May yet, we are expecting early numbers shortly.
- That is where we are really looking for assistance, if you want to help the rental industry and keep people from becoming homeless, and to keep them housed if they get help paying their rental assistance for people who have just lost their jobs and can't pay rent.
- If they get help with rental assistance, while an evictions ban is in place that eventually goes away that doesn't mean that they won't be evicted for missed rent for the months those bans were in place.
- If you want to help, you need to find a way for them to pay the rent they own or work on making a payment plan
- For all our residents who have issue paying the rent they owe. That rental assistance will help them pay some of the back rent they owe. Once they back to work they won't have the money to pay back rent they owe
- It keeps them having a lower amount of back rent they owe, it will also keep us floating as well. Keep properties maintained and the banks in business as well, keeps them lending.
- In the nutshell, this is what we see as the problems and what we think the solution is.

Unknown Name / Solomon's Porch

- Faith-based organization in Jessup

- Support a lot of people through pick up food at the pantry, and we have food distribution
- Seeing a need for gas for their cars since COVID-19 situation need for gas to get to their jobs.
- Some are church members, and some have lost their job
- Requesting support for funds for gas and other misc. needs

Bita Dayhoff / Community Action Council of Howard County

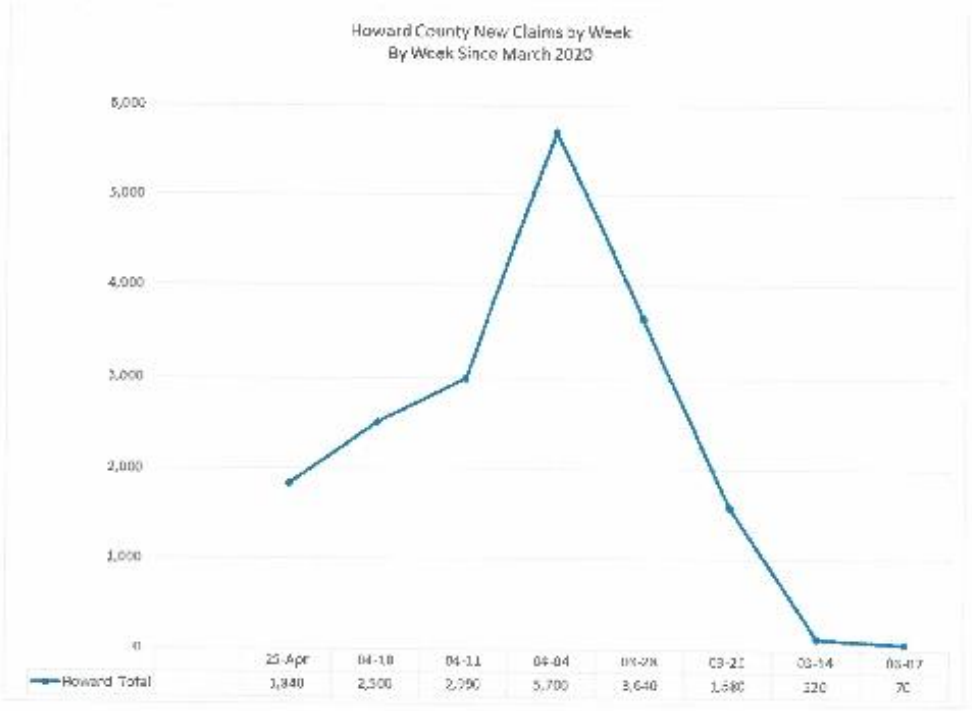
- Impact on clients, the impact on low-income families in Howard County is actually multi-layered, this is a population that has been struggling all along and this has just exacerbated these challenges they have been facing
- What we are seeing is a large number of our households have become unemployed, either temporarily or on a permanent basis, and these households have their children at home with them which adds on another level of demand especially for school-aged children who have on-line learning and children who are in our Head Start Program or parents who are also participating in on-line learning.
- Trying to support those parents with mental health, and speech and language, and different level of services on the same level as when they were bringing their children into the Centers or coming into our offices, and to provide them all online or by phone, have been very challenging for both parties.
- There is a lack of access to food, we have seen numbers at the Howard Food Bank go up three-fold from what we are accustomed to seeing.
- In the last 8 weeks we have served 12,000 people and there continues to see an increase of people coming to the food bank, but also
- We see an increased demand, to bring the food to them because of stay at home order, which brings the challenge of not necessarily being able to give them non-perishable foods, like milk and eggs, that are less expensive sources of protein, that is very important, especially for little children so we are challenged to get those items into our proper pantry menus
- Definite anxiety about the cost of housing end energy, I think we hear Peter talk about that it is important to add
- I was looking at a report that indicated that 1/3 of Americans did not pay the rent in April and even though the moratorium is definitely going to help, it is only going to help about 28% of the rental units that was covered under the federal government grant.
- Take into consideration the formal rental agreement that we know happen all the time, there is very little opportunity for many for our clients to pay up to 3 months of rent when we know there has been reduction of income to the household, so like Peter said there really is a need for rental subsidies program in the county to meet that demand.
- Organizational Challenges – having to re-design our entire service delivery model in a very short period of time, to do our best to keep everyone safe, all our staff safe and all or clients safe

- Make sure we have the right technology in place to be able to telework, and just having the capacity in place to be able to serve the increased number people coming through our doors.
- Last additional comment – many of the parents that have not been working, and are not essential workers (restaurants, hospitality), when the economy opens back up there will be nowhere to send their children unless Child Care centers and specifically Head Start locations begin to open up.

Joan Driessen / Association Community Services (ACS)

- Continues to be a response to food insecurity, people continue to step up
- Next wave of need will be for rental assistance
- But, the concern is that in the coming months there will be big increase in the need for utility assistance, there will be an increase in people who won't be able to pay their utilities to keep their light on
- We are an association of nonprofits; and many nonprofits are struggling, they may make it to June 30th because many got payroll protection loan, but they won't get much further. Most rely on program income to pay the bills, along with fundraising income
- With social distancing in place, non-profits can't do their spring fund raising as is typical, and which helps raise a significant amount of their annual budget. Many have already paid up front costs that they won't be able to get back
- Many struggle, with technology normally, trying to keep it up to date, so having to convert more functions virtually has been a challenge. Many non-profits do not have the technical capacity to do that and have had to upgrade software and hardware to function remotely
- So that is what we are hearing from our members, along with the emotional support they are trying to provide to their clients, especially families with children at home with severe disabilities.
- ACS is fortunate we will continue to function. We were able to get a payroll protection loan, so we will be good until June 30th.
- But ACS continues to use part-time consultants to get some of the work done, but we might NOT be able to hire consultants after June 30th they were not included in those loans.
- A lot of the organizations had to furlough employees, and I expect there will be more after June 30th

HOWARD COUNTY, MARYLAND COVID-19 UNEMPLOYMENT CLAIMS



COVID-19 Narrative

As of May 14, 2020, six weeks into the COVID-19 Pandemic economic shut-down to combat the spread of the corona virus, **Howard County has seen more than 26, 000 people file for unemployment insurance.** With that week seeing an additional 3,199 residents forced into the unemployment to no fault of their own.

On May 13, 2020 Maryland Governor Hogan, announced the State's plan to Stage 1 for the re-opening of State economy and lifting the Stay at Home order. Each County Executive was given discretion on the reopening of their individual counties. Howard County Executive Ball based on modeling to understand the full exposure that County needed to meet the testing capacity of 6,500 individuals a week and the capacity to have a robust contact tracing in place. The County Executive also indicated that County has not had a decrease in cases or hospitalizations over rates over the last fourteen days. The County's proximity to six jurisdictions that have significant

case rates, and the lack of sufficient levels of personal protective equipment (PPE) are identified as reasons for keeping the county economy shut-down until these and other health indicators are resolved.

Comments from Virtual Public Hearings *(full comments in Citizen Participation Backup – AD-26)*

Comments received from our nonprofit partners during all three of the virtual needs hearings, clients their agency is serving during this pandemic, overwhelmingly the top two needs indicated were food insecurity and help with rental assistance, across all income levels, and age demographics.

At the time of virtual needs hearings there is an eviction moratorium, comments heard throughout the three days of hearings, is the fear that evictions will begin to occur as soon as the order is lifted. The comments indicated there is a fear that the evictions will spike at that time. The additional fear for these residents, which were unable to pay rent, due the loose of a job or a reduction to the household's income during the economic shut down, is that when the state of emergency is lifted their landlords will require full payment of missed back rent or face eviction into homelessness.

Additional comments from our nonprofit landlords, who have seen their clients lose jobs during the economic shutdown, is that they are experiencing their own difficulty paying their mortgages. For these agencies, if they are not collecting rent they not able to pay all their regular monthly expenses; these property owners can't pay their utilities, can't pay operating, and they can't always pay their debt. Many of our nonprofit landlords are having to pay these expenses out of "rainy day" funds, but these funds are limited and won't last very long. The overwhelming concern is that Howard County will lose affordable rental properties if these organizations are not able to whether this economic shutdown during the pandemic. Helping with back rent clients have not been able to pay, will help maintain these units as affordable.

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ■ Columbia, Maryland 21046 ■ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410 313-3960

Community Planning and Grants Division
COVID-19 Needs Hearings
WebEx Conference Calls
AGENDA

Dates & Times of Calls

1. Thursday, April 30, 2020 – 1:00 PM – 3:00 PM
2. Tuesday, May 5, 2020 – 10:00 AM – 12 Noon
3. Thursday, May 7, 2020 – 2:00 PM – 4:00 PM

The CARES Act

Contained in The CARES Act is the requirement that expenditures be incurred "due to" the public health emergency means that expenditures must be used for actions taken to respond to the public health emergency. These may include expenditures incurred to allow the State, territorial, local, or Tribal government to respond directly to the emergency, such as by addressing medical or public health needs, as well as expenditures incurred to respond to second-order effects of the emergency, *such as by providing economic support to those suffering from employment or business interruptions due to COVID-19-related business closures.*

Framework of Call:

- Name and the organization you represent.
- What are the struggles your clients are identifying to your organization since the COVID-19 State of Emergency was declared in mid-March?
- What is the significant impact this shut-down has had on your organization?

Another Way to Provide Comments or Concerns:

If time does not allow for everyone to be given a chance to speak, please feel free to provide comments by email to Elizabeth Meadows, Chief of Community Planning and Grants, at emeadows@howardcountymd.gov. Please use the framing questions above to provide your comments related to the impact of COVID-19 state of emergency on low-income Howard County residents.

Next Steps:

- Application Process – Nkechi Animashaun
- Due to the extreme need to get the funding out to the community, nonprofits must have an established process in place. This CDBG-CV funding is not for establishing a new program.
- Activities related to short-term rental assistance, eviction prevention and housing stability will be given priority consideration.
- Administrative cost limited to 15% of award; the majority is for direct client services.
- These applications will also be used for future award consideration if additional County funding is allocated for COVID-19 housing concerns
- **Applications Due Date: Friday, May 22, 2020 at 5:00 PM**

Howard County Department of Housing and Community Development

CARES ACT CDBG-CV Funding Application FFY2019

Program Description: On March 27, 2020 President Trump signed into law, *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act) which will ultimately make available $5 billion in supplemental Community Development Block Grant (CDBG) funds, which will be used for grants to ***prevent, prepare for***, and ***respond to*** the coronavirus. An allocation of ***$770, 356*** in CDBG-CV funds has been awarded to Howard County, which will be available in the form of grants to local non-profits.

Contained in The CARES Act is the requirement that expenditures be incurred "due to" the public health emergency means that expenditures must be used for actions taken to respond to the public health emergency. These may include expenditures incurred to allow the State, territorial, local, or Tribal government to respond directly to the emergency, such as by addressing medical or public health needs, as well as expenditures incurred to respond to second-order effects of the emergency, *such as by providing economic support to those suffering from employment or business interruptions due to COVID-19-related business closures.*

Eligible Applicant:

A non-profit entity, for-profit organization, housing agency or public housing authority that currently serves Howard County residents either with housing assistance programs or community development activities.

Eligible Activities:

CDBG-CV Program funds are eligible for the activities listed below if they prevent, prepare for and respond to the coronavirus. Please note that CDBG-CV program funds are NOT for new programs but for existing CDBG eligible activities such as;

- Housing rehabilitation;
- Housing reconstruction;
- Short-term rental subsidies;
- Public services and
- Administrative Costs (Not to exceed 15% of the grant award).

*Activities related to providing short-term rental subsidies, eviction prevention and otherwise related to housing stability will be given priority consideration.

* These applications will also be used for future award consideration if additional County funding is allocated for COVID-19 housing concerns.

FORMAT:

- Applications should comprise of least a two (2) page narrative clearly stating the need for the CDBG-CV program funds. The narrative should outline the impact of the coronavirus on the population that you serve, and how these program funds will be used to ameliorate this impact. The narrative should include qualitative and quantitative data that demonstrate the need for these funds. Text should be in 12 pt. font, and single spaced.

- Each application should include a cover page which lists the name of the entity submitting an application, proposed activity, dollar amount requested, and the name and contact information of the person submitting the application, as shown in the example below.

  Name of Entity: _____
  CDBG-CV Activity: _____
  Amount Requested: _____
  Proposed No. Households Served: _____
  Person Submitting the Application: _____
  Contact Information of Person Submitting the Application
  Email: _____ *Phone Number:* _____

- The final page of the application should include the certification clause below, followed by the printed name and signature for the authorized representative of the entity. (E-signatures are eligible)

  *"I acknowledge that funds are to be used in such a manner as to ensure the principal benefit to low- and moderate-income persons, **affected by the coronavirus**. I certify that I have reviewed this application in its entirety and that, to the best of my knowledge and belief, all of the information provided in this application is true and accurate. I further certify that I am officially authorized to sign for and represent the organization in the submission of this application."*

  _____ _____

  Signature of Authorized Representative **Date**

Printed Name / Title

- Applications should be submitted in software such as Microsoft Word or PDF format.

DEADLINE:

- Applications must be submitted on or before **May 22, 2020** by **5:00 p.m.** via email to gmeadows@howardcountymd.gov

- For any additional questions, you can email nanimashaun@howardcountymd.gov

Public Notice and Notice of Public Hearing

Howard County Department of Housing and Community Development
PROPOSED AMENDMENTS TO ANNUAL ACTION PLANS

May 21, 2020

In accordance with 24 CFR Part 91 of the federal regulations governing the Consolidated and Annual Action Plans and Howard County's Citizen Participation Plan, notice is hereby given that the Howard County Department of Housing and Community Development (DHCD) is proposing to amend its FFY18 and FFY19 Annual Action Plans.

Howard County is beginning the process of making a Substantial Amendment to our FFY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020, the County submitted a Waiver Letter to HUD requesting the use of those waivers allowing for the virtual town hall meetings and the **5-day public comment period.**

Howard County conducted three Virtual Public Needs Hearing on April 30, May 5 and May 7, 2020. The invitation was emailed to 138 stakeholders from the Nonprofit Stakeholder list maintained at the Department of Housing and Community Development. An application for this funding was released on May 1, 2020, for nonprofits to apply to the County for funding to respond to the COVID-19 struggles many of our low-income residents have seen since the state of emergency began. The application due date is May 22, 2020 at 5:00 PM.

The proposed amendments also involve the reallocation of *$173,876.04* in FFY18 CDBG Program funds to allow the County to utilize prior year's projects/activities which have unobligated balances and to re-program funds to other approved projects in order to fulfill the County's obligation of creating affordable housing and community development.

The new activities are described below:
The United Way of Central Maryland, a 501 (c) (3) non-profit in Howard County, will use CDBG funds in FFY20 to renovate a 9,000 square foot space in Columbia for use as the new Family Center to meet the critical need for affordable, quality childcare in Howard County. Through this project, United Way is building the first non-profit, child-care center.
Award Amount $86,938.02

Humanim, Inc., a 501(c)(3) non-profit in Howard County, will use CDBG funds in FFY20 to provide renovations at their Gerwig building including a mock apartment for client training (for community integration); renovation of all bathrooms and the construction of a changing room with an electric adult changing table and shower that meets ADA standards. The renovations also include painting the entire interior, updating electrical and duct work, replacing doors, installing new flooring throughout the building, and repairing and staining flooring in the back portion of a facility that supports many activities and programs for persons with intellectual and developmental disabilities. **Award Amount $86,938.02**

The draft version of the Amended FFY2019 Annual Action Plan will be posted on the County's website beginning Thursday, June 4, 2020, on the Housing webpage at www.howardcountymd.gov under "Departments". **All comments must be received by June 9, 2020 at 11:59.99 PM.**

Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov.

The table on the following page shows the proposed allocation of funds as follows:

Action Plan Year	Disbursing Activity	Initial Allocation	Revised Allocation	Amount to be Reprogrammed	Receiving Activity
FFY19	FFY18 Roger Carter (CDBG)	$ 200,000.00	$ 196,984.96	$ 3,015.04	**Homanim Rehab (FFY19 New Activity)**
FFY19	FFY18 Program Administration (CDBG)	$231,572.80	$60,711.80	$83,922.98	**Homanim Rehab (FFY19 New Activity)**
				$86,938.02	**The United Way Rehab (FFY19 New Activity)**
Total				**$ 173,876.04**	

Howard County 5-Day Public Comment Period June 4 -9, 2020

- No comments or concerns received

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

Departments

Community Planning and Grants

What are our Grants?

Our Department receives funding from the U.S. Department of Housing and Urban Development (HUD) and administers those grants to non-profits who work directly with residents of Howard County. The County receives Community Development Block Grants (CDBG) and HOME funds.

DHCD Grant Items

CDBG-CV FFY2019 SUBSTANTIAL AMENDMENT

HOWARD COUNTY FFY2019 SUBSTANTIAL AMENDMENT

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CDBG Amendment

Howard County did a Substantial Amendment to our FFY2019 Annual Action Plan to in response to $770,356.00 CDBG-CV funding the County is receiving and to reprogram $173,876.04 in FFY2018 CDBG Program funds.

We have amended our Citizen Participation Plan, to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020 the County submitted a Waiver Letter requesting the use of those waivers allowing for the virtual town hall meetings and the **5-day public comment period.** Howard County conducted three Virtual Public Needs Hearing on April 30, May 5 and May 7, 2020. The invitation was emailed to 138 stakeholders from the Nonprofit Stakeholder list maintained at Department of Housing and Community Development.

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Woods Drive, Suite 24, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov .

Link to Amended FFY19 Annual Action Plan

CARES ACT CDBG-CV Funding

NOTICE OF PUBLIC HEARING - April 23, 2020

DRAFT FFY2020 - FFY2024 CONSOLIDATED PLAN & FFY2020 ANNUAL ACTION PLAN

Fair Housing Analysis

Approved FFY2019 Annual Action Plan

FFY2018 DRAFT Consolidated Annual Performance and Evaluation Report (FFY18 DRAFT CAPER)

HOME Program Policy Guide

Approved FFY2016-FFY2019 Consolidated Plan / FFY2016 Annual Action Plan

Howard County, Maryland
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

ask@howardcountymd.gov

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Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Tuesday, June 2, 2020 2:27 PM
To: Kareem, Quanita
Cc: Animashaun, Nkechi
Subject: Substantial Amendment & Narrative for Grant Webpage before Thursday June 4th

Hi Quanita;

Can you please put the following narrative and the draft FFY2019 Substantial Amendment onto our Grants webpage before Thursday, June 4th?

The amendment can be found at: T:\Community Planning & Grants\COVID-19\FFY2019 Amendment\Draft Amendment

HOWARD COUNTY FFY2019 SUBSTANTIAL AMENDMENT

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Link to Amended FFY19 Annual Action Plan

Thanks very much, Elizabeth

1

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
cmeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

PUBLIC NOTICE
AND
NOTICE OF PUBLIC HEARING

Howard County Dept. of Housing and Community Development
9820 Patuxent Woods Drive
Columbia, MD 21046

April 23, 2020

The Howard County Department of Housing and Community Development (DHCD) gives notice that it has amended its Citizen Participation Plan (CPP) for programs covered under the Consolidated Plan as required by the U.S. Department of Housing and Community Development (HUD). The CPP provides and encourages Howard County residents to participate in the development and review of the Consolidated Plan, The Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH). Howard County DHCD invites all interested citizens, community groups, agencies and organizations to provide your comments regarding the Amended CPP. A copy of the Amended CPP is available for review and comment from May 1, 2020 to June 1, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/

Public Hearing Date and Location

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council, were closed to the public until further notice. Government operations are continuing through teleworking. To provide comments or concerns for the amended CPP, through email or in writing to the information below:

Email: housing@howardcountymd.gov.
Address: 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046

Comment Due Date: June 1, 2020 by 5:00PM

Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in notice above. Written comments must be received no later than 5:00 pm on the date of the Hearing and all comments must be received by the end of the thirty (30) day Public Comment Period. (June 1, 2020).

Meadows, Elizabeth

From:	Kemp, Noah <nkemp@tribpub.com>
Sent:	Tuesday, May 19, 2020 10:20 AM
To:	Meadows, Elizabeth
Cc:	Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject:	RE: Public Notice for Publication

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Sounds good,
I went ahead and submitted your legal notice, **6678898 & 6678877** for publication. Your account, **CU00168892** has been invoiced.

You will receive your affidavit (proof of publication) via mail to address on file within 7-10 business days after the final run date.

If you have any further questions feel free to reach out!

Have a great day!

Noah Kemp
Inbound Advertising Representative

Please note: In response to stay-at-home orders and social distancing policies due to COVID-19, our classified advertising team is working from home. Affidavits will be delayed until further notice. Many courts, clerk's and government offices are postponing cases and suspending non-essential services. If you do have an urgent affidavit request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

Baltimore Sun, 410-539-1700 • *Capital Gazette*, 410-268-7900 • *Carroll County Times*, 410-857-5581
Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525
Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2111 • *Orlando Sentinel*, 407-420-5160
Sun Sentinel, 800-250-2000 • *Tidewater Review*, 757-253-8126 • *Virginia Gazette*, 757-253-8126
Virginian-Pilot, 757-622-1455

TRIBUNE PUBLISHING
the results group

Communication may be reviewed for quality & training purposes.
Great Customer Service is our top priority.
Share your feedback at excellence@tribpub.com

From: Kemp, Noah
Sent: Tuesday, May 19, 2020 9:04 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>

1

Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Delk, Tracy <tdelk@howardcountymd.gov>
Subject: RE: Public Notice for Publication

Good morning

Thank you for your legal notice request.

A ***proof*** is attached for your review and approval. *Please carefully review the proof to ensure that all text is accurate for publication.* Your response is needed on ***TODAY, 5/19/2020 before 12pm*** deadline to ensure the notice is printed on ***5/21/2020*** in the ***Howard County Times & Columbia Flier***. If approved, I can go ahead and invoice the account, **CU00168892 Howard County Dept of Housing** for the amount of **$.**

Ad number for reference:
6678877- $271.55 HOWARD COUNTY TIMES
6678898- $ 248.33 COLUMBIA FLIER

**The notice will not be printed without approval. Please let me know if you have any questions.*

Thank you,

Noah Kemp
Inbound Advertising Representative

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Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525
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Great Customer Service is our top priority.
Share your feedback at excellence@tribpub.com

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Tuesday, May 19, 2020 7:41 AM
To: Harris, Ellen <eharris@baltsun.com>; Welenc, Charlie <cwelenc@tribpub.com>; cnglegal@tronc.com <cnglegal@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>;

Deik, Tracy <tdeik@howardcountymd.gov>
Subject: Public Notice for Publication

Caution: External Sender
Good Morning:

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **May 21, 2020** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HøCoCounts 2020 CENSUS CensusMaryland

3

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6678877

Printed: 5/18/2020 8:56:25 AM

* Agency Commission not included

GROSS PRICE * : **$271.55**

PACKAGE NAME: CNG Howard County Times Single

THE BALTIMORE SUN MEDIA GROUP

Order ID: 5678877

Printed: 5/19/2020 8:56:25 AM

* Agency Commission not included

GROSS PRICE * : **$271.56**

PACKAGE NAME: CNG Howard County Times Single

Product(s): Howard County Times, classified.MDDC.com_CNG

AdSize(s): 2 Column (8TAB)

Run Date(s): Thursday, May 21, 2020

Color Spec. B/W

Preview

Public Notice and Notice of Public Hearing

Howard County Department of Housing and Community Development
PROPOSED AMENDMENTS TO ANNUAL ACTION PLANS

May 21, 2020

In accordance with 24 CFR Part 91 of the federal regulations governing the Consolidated and Annual Action Plans and Howard County's Citizen Participation Plan, notice is hereby given that the Howard County Department of Housing and Community Development (DHCD) is proposing to amend its FFY18 and FFY19 Annual Action Plans.

Howard County is beginning the process of making a Substantial Amendment to our FFY2019 Annual Action Plan in response to $770,356.00 CDBG-CV funding the County is receiving. We have amended our Citizen Participation Plan to allow for virtual public hearings and a 5-day Public Comment Period. On April 23, 2020, the County submitted a Waiver Letter to HUD requesting the use of those waivers allowing for the virtual town hall meetings and the **5-day public comment period.**

Howard County conducted three Virtual Public Needs Hearing on April 30, May 5 and May 7, 2020. The invitation was emailed to 138 stakeholders from the Nonprofit Stakeholder list maintained at the Department of Housing and Community Development. An application for this funding was released on May 1, 2020, for nonprofits to apply to the County for funding to respond to the COVID-19 struggles many of our low-income residents have seen since the state of emergency began. The application due date is May 22, 2020 at 5:00 PM.

The proposed amendments also involve the reallocation of $173,876.04 in FFY18 CDBG Program funds to allow the County to utilize prior year's projects/activities which have unobligated balances and to re-program funds to other approved projects in order to fulfill the County's obligation of creating affordable housing and community development.

The new activities are described below:
The United Way of Central Maryland, a 501 (c) (3) non-profit in Howard County, will use CDBG funds in FFY20 to renovate a 9,000 square foot space in Columbia for use as the new Family Center to meet the critical need for affordable, quality childcare in Howard County. Through this project, United Way is building the first non-profit, child-care center.
Award Amount $96,938.02

Humanim, Inc., a 501(c)(3) non-profit in Howard County, will use CDBG funds in FFY20 to provide renovations at their Gerwig building including a mock apartment for client training (for community integration); renovation of all bathrooms and the construction of a changing room with an

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6678877

Printed: 5/19/2020 8:56:25 AM

* Agency Commission not included

GROSS PRICE * : **$271.55**

PACKAGE NAME: CNG Howard County Times Single

standards. The renovations also include painting the entire interior, updating electrical and duct work, replacing doors, installing new flooring throughout the building, and repairing and staining flooring in the back portion of a facility that supports many activities and programs for persons with intellectual and developmental disabilities. **Award Amount $66,938.02**

The draft version of the Amended FFY2019 Annual Action Plan will be posted on the County's website beginning Thursday, June 4, 2020, on the Housing webpage at www.howardcountymd.gov under 'Departments'. **All comments must be received by June 5, 2020 at 11:59.99 PM.**

Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov.

The table on the following page shows the proposed allocation of funds as follows:

5/21/2020 6678877

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6678898

Printed: 5/19/2020 9:02:44 AM

Page 1 of 3

* Agency Commission not included

GROSS PRICE * : **$248.33**

PACKAGE NAME: CNG Columbia Flier Single

GROSS PRICE * : **$248.33**

PACKAGE NAME: CNG Columbia Flier Single

Product(s): Columbia Flier, classified.MDDC.com_CNG
AdSize(s): 2 Column (8TAB)
Run Date(s): Thursday, May 21, 2020
Color Spec. B/W

Preview

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THE BALTIMORE SUN MEDIA GROUP

Order ID: 6678898

Printed: 5/19/2020 9:02:44 AM

Page 3 of 3

* Agency Commission not included

GROSS PRICE * : **$248.33**

PACKAGE NAME: CNG Columbia Flier Single

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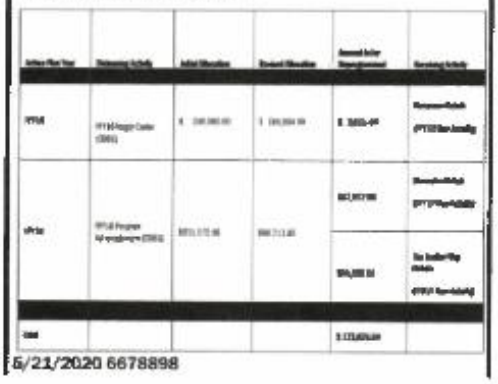
Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov.

The table on the following page shows the proposed allocation of funds as follows:



5/21/2020 6678898

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Tuesday, May 19, 2020 8:41 AM
To:	Ellen Harris (ceharris@baltsun.com); Fox, Rodney; Patuxent Legals Email (cnglegal@tronc.com)
Cc:	Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject:	Public Notice for Publication
Attachments:	Public Notice_FFY2019 Action Plan Amendments kc edits.doc

Good Morning;

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **May 21, 2020** issues of the Howard County Times and Columbia Flier.

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M. Elizabeth Meadows, Chief
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HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HoCoCounts 2020 CENSUS CensusMaryland

1

Meadows, Elizabeth

From: Spicer, Karen
Sent: Wednesday, May 13, 2020 9:35 PM
To: Spicer, Karen
Subject: Howard County Coronavirus Updates: County Executive's Response to Governor's Stage 1 Reopening, Pop-up Pantries, EDA Launches Business Reopening Tool

The following news release was issued to media outlets tonight.

Howard County Government
News Release

Office of Public Information
3430 Courthouse Drive
Ellicott City, Maryland 21043

410-313-2022 / FAX 410-313-3390 / www.howardcountymd.gov

Scott Peterson
Director of Communications
speterson@howardcountymd.gov

May 13, 2020

Media Contact:
Scott Peterson, Director of Communications, Office of Public Information, 202-277-9412

Coronavirus Updates: County Executive's Response to Governor's Stage 1 Reopening, Pop-up Pantries, EDA Launches Business Reopening Tool

ELLICOTT CITY, MD – County Executive Calvin Ball released the following statement addressing the Governor's announcement this evening:

"Governor Hogan has given individual counties and regions the discretion to review our own data and make decisions about when it is appropriate for us to relax certain restrictions. Howard County does not meet many of the criteria that the Governor outlined in his four building blocks to reopen."

Ball continued, "Our testing capacity has increased; however, we have only tested about 2% of our Howard County population, or nearly 6,000 individuals to date. Based on modeling to understand full exposure, we need to test up to 6,500 individuals a week. The Governor has demonstrated a commitment to acquire more testing, however these tests will likely go to larger jurisdictions first. Additionally, we do not yet have a robust contact tracing operation, we have 11 out of 45 positions currently filled, and need more time to achieve 15 contact tracers per 100,000 residents. Howard County has also not seen a decrease in cases or hospitalizations over the last 14 days, and borders six jurisdictions, a majority of which have significant case rates."

"Lastly, while we have ramped up our supply of PPE, it is still scarce and reopening sectors of our economy will increase demand making it more difficult to secure a safe stockpile.
We do not have the building blocks in place that the Governor has outlined necessary for Stage One of reopening.

1

26,000. We are still working towards many of the building blocks needed for additional reopening, but we feel as though some limited retail and outdoor activities can resume safely at this time."

County Executive Ball has made the following decisions on each of the Governor's Phase One actions:

- **Stay-At-Home Order**
  - Howard County did not implement a county-wide Stay-At-Home order and one will not be implemented at this time. Residents are encouraged to stay at home as much as possible and abide by the Governor's "Safer-At-Home" public health advisory.
- **Religious Services**
  - Howard County in-person religious gatherings may resume with 10 people or less and are strongly encouraged to take place in outdoor settings.
- **Retail**
  - The following is a non-exhaustive list of Howard County retail businesses that may open but are restricted to curbside pick-up or delivery only:
    - Art galleries
    - Bookstores
    - Clothing and shoe stores
    - Florists
    - Furniture stores
    - Jewelers
    - Lawn and garden stores
    - Pawn shops
    - Sporting goods stores
    - Tobacco and vape shops
  - The following retail establishments may operate at 50% capacity:
    - Pet Groomers
    - Animal Adoption
    - Car Washes
- **Manufacturing**
  - Howard County manufacturing businesses may open following the guidelines issued by the State of Maryland.
- **Barber Shops/Beauty Salons**
  - Howard County barber shops and hair salons may open by appointment only with only one customer allowed in a location at a time. Businesses should follow guidelines issued by the State of Maryland.
    - The Governor's Phase One reopening does **NOT** include nail salons, esthetician services, or massage parlors.
- **Archery/Shooting Ranges**
  - Howard County outdoor archery and shooting ranges may open with appropriate physical distancing and mask requirements.
- **Campgrounds**
  - Howard County campgrounds will remain closed.
- **Marinas/Watercraft Rental**
  - Howard County Recreation & Parks boat rentals will remain closed.
  - Columbia Association's boat rentals will remain closed.
- **Horse Boarding/Riding Facilities**
  - Howard County horse boarding and riding facilities may open with appropriate physical distancing and mask requirements.
- **Mall in Columbia**

- Mall in Columbia stores with exterior access may open for curbside pick-up or delivery only.

The Governor's Executive Order keeps non-essential businesses closed, including, but not limited to:

- Bingo halls
- Bowling alleys
- Pool halls
- Amusement parks
- Roller and ice skating rinks
- Miniature golf establishments
- Social and fraternal clubs, including American Legion, VFW, Elks Clubs
- Any other establishment subject to the admission and amusement tax
- Tattoo Parlors
- Tanning salons
- Massage parlors
- Establishments that provide esthetic services or provide nail technician services

Howard County government buildings will remain closed at this time to members of the public.

HoCo RISE

Howard County's reopening framework, HoCo RISE uses data to inform decision-making around reopening and, if necessary, when to reinstitute restrictions:

1. The number of new cases.
2. The number of new hospitalizations.
3. The number of patients admitted to ICU.
4. The number of tests conducted.
5. The amount of available PPE.
6. Surge capacity at Howard County General Hospital (HCGH).

In addition to each of the data factors above, HoCo RISE follows the Governor's guidance on the building blocks for reopening. All data is a point in time as of May 13, 2020. Data regarding surge capacity is according to CRISP.

- **Expanded Testing Capacity**: Currently testing 1,300 people per week at 7 sites across the county. The goal is to test 6,500 people per week.
- **Sufficient Surge Capacity**: Howard County General Hospital has 133 staffed acute care beds (89% utilization), 33 staffed intensive care unit beds (67% utilization), and 38 ventilators (21% utilization). Additional capacity is available as needed in medical tents.
- **Ramping Up the Supply of PPE:** Howard County Health Department has secured 54,559 N95s, 100,480 surgical masks, 10,807 gowns, 9,176 face shields, approximately 310,000 gloves and other PPE. To increase supply, the County will continue securing donations, decontaminating masks for reuse, and partnering with manufacturers to develop innovative solutions.
- **Robust Contact Tracing Operations**: Howard County has 11 staff dedicated solely to contact investigation and contact tracing and 15 staff dedicated to outbreak investigation. The Health Department will eventually have more than 60 contact tracers available.

Howard County has also implemented an Internal Working Group which is in the process of developing guidance to assist county departments with safely bringing back employees and reopening government facilities.

As Governor Hogan moves through the phases of the Maryland Strong Roadmap to Recovery, County Executive Ball will use HoCo RISE to:

- Take a phased approach to reopening government safely, following the recommendations of the internal HoCo RISE Working Group
- Provide guidance to non-governmental entities, as needed
- Use the HoCo RISE metrics to ensure the timeline laid out by Governor Hogan is appropriate for Howard County

HoCo RISE is also focused on long-term recovery, including but not limited to the following initiatives:

- Rental Assistance and Eviction Relief
- Job Training
- Behavioral Health Resources
- Food access
- Business Support

Howard County is applying for its share of CARES Act funding ($28 M available for non-health expenses) to provide business assistance and support other unbudgeted county expenses. The county will also soon be launching a virtual disaster assistance center to help businesses and individuals access needed services.

###

Karen Spicer
Office of Public Information
Howard County Government
3430 Court House Drive
Ellicott City MD 21043
(office) 410-313-2022
(direct) 410-313-0538

HoCo RISE

Calvin Ball
Howard County Executive

What is HoCo Rise? HoCo RISE is Howard County Executive Calvin Ball's plan of **R**eopening **I**nnovatively, **S**afely, and **E**ffectively within the framework laid out by Maryland Governor Larry Hogan.

HoCo RISE uses **data** to inform decision-making

Data points currently used to guide decision-making around reopening and, if necessary, when to maintain or restrictions:

1. The number of new cases. [1]
2. The number of new hospitalizations.
3. The number of patients admitted to ICU.
4. The number of tests conducted.
5. The amount of available PPE.
6. Surge capacity at Howard County General Hospital (HCGH). [2]

HoCo RISE follows the Governor's guidance on the building blocks for reopening [3]

Expanded Testing Capacity

Best Practices: The American Enterprise Institute [4] estimates that a national capacity of at least 750,000 tests per week would be sufficient to move to case-based interventions when paired with sufficient capacity in supportive public health infrastructure (contract tracing). The Center for American Progress suggested that 2.6 million tests per day are needed nationally, which would amount to approximately 2,575 tests per day in Howard County. [5] Harvard University's Safra Center for Ethics estimated 5-20 million tests per day are needed nationally, [6] which would amount to approximately 5,000 tests per day in Howard County. [7]

Howard County Current Testing Capacity: Currently testing 1,300 people per week at 7 sites across the county.

Goal: The goal is to test 6,500 people per week. [8]

Sufficient Surge Capacity

Best Practices: According to the American Enterprise Institute, hospitals should have 5-7 critical care beds per 10,000 adults, 5-7 ventilators per 10,000 adults, and at least 30 acute care beds per 10,000 adults in the setting of an epidemic. [10]

Howard County General Hospital Current Surge Capacity: Howard County General Hospital has 133 staffed acute care beds (89% utilization), 33 staffed intensive care unit beds (67% utilization), and 38 ventilators (21% utilization). [11] Additional capacity is available as needed in medical tents.

Goal: The goal is to ensure that capacity always exceeds utilization, which we currently meet. An additional goal is to have an adequate alternate care site plan in the event our utilization exceeds our capacity. Howard County Government and Howard County General Hospital are currently working on the alternative care site plan with the state.

Ramping Up the Supply of Personal Protective Equipment (PPE)

Best Practices: In order to determine the amount of PPE needed for government and hospital use, the following factors are considered: the number of COVID-19 patients per day, number of workers in contact with positive patients, expected duration of patient stay, estimated number of patients sharing rooms, reusability of PPE, available modeling, and other factors as needed.

Howard County Current Supply of PPE: Howard County Health Department has secured 54,559 N95s, 100,480 surgical masks, 10,807 gowns, 9,176 face shields, approximately 310,000 gloves and other PPE to date. Currently, Howard County has enough PPE to cover EMS workers, the Howard County Health Department, nursing homes, and Howard County General Hospital for 30 days. [12]

HoCo RISE

Calvin Ball
Howard County Executive

Goal: The PPE goal is to have enough on hand for 30 days, which the county currently has. However, the amount of PPE needed is constantly changing based upon the forecasted number of COVID-19 cases. To increase supply, the County will continue securing donations, decontaminating masks for reuse, and partnering with manufacturers to develop innovative solutions.

Robust Contact Tracing Operations

Best Practices: The Center for Health Security at the Johns Hopkins Bloomberg School of Public Health estimates 15 contact tracers per 100,000 population are needed. [13] Estimates from the NGA indicated a range from 4 – 81 contact tracers per 100,000 population are needed based on the level of illness. [14]

Howard County Current Contact Tracing Capacity: Howard County has 11 staff dedicated solely to contact investigation and contact tracing, and 15 staff dedicated to outbreak investigation.

Goal: While 45 contact tracers is the initial goal based on the estimated need per 100,000, we believe we will exceed this goal. The Health Department will eventually have more than 60 contact tracers available.

As Governor Hogan continues to move through the phases of the Maryland Strong Roadmap to Recovery, County Executive Ball will use HoCo RISE to…

- Balance state guidelines with what is best for Howard County, including keeping restrictions as needed
- Take a phased approach to reopening government safely, following the recommendations of the internal **HoCo RISE Working Group**
- Provide guidance to non-governmental entities, as needed
- Use the HoCo RISE metrics to ensure the timeline laid out by Governor Hogan is appropriate for Howard County

Additionally, the internal HoCo RISE Working Group is in the process of developing guidance to assist county departments with safely bringing back employees and reopening government facilities.

HoCo RISE is also focused on long-term recovery, including but not limited to the following initiatives…

- Rental Assistance and Eviction Relief
- Job Training
- Behavioral Health Resources
- Food access
- Business Support

Howard County is applying for its share of **CARES Act** funding (*$28 M available for non-health expenses*) to provide business assistance and support other unbudgeted county expenses. The county will also soon be launching a virtual disaster assistance center to help businesses and individuals access needed services.

---

[1] According to the National Governor's Association, the goal for cases should be a decrease for at least 14 days. "Roadmap to Recovery: A Public Health Guide for Governors." National Governor's Association, April 22, 2020. Page 34.
[2] According to the National Governor's Association, hospitals should be able to care for all patients without using crisis standards of care. NGA, page 35
[3] "Maryland Strong Roadmap for Recovery." Maryland Governor Larry Hogan, April 24, 2020. Page 11.
[4] "National Coronavirus Response: A Road Map to Reopening." American Enterprise Institute, March 28, 2020. Page 4.
[5] "A State and National Plan to End the Coronavirus Crisis." Center for American Progress, April 8, 2020.
[6] 2.6 million represents 30.9% of the U.S. population. That percentage of the County's population amounts to approximately 2,575.
[7] "Roadmap to Pandemic Response: Massive Scale Testing, Tracing, and Supported Isolation (TTSI) is the Path to Pandemic Resilience for a Free Society." Edmond J. Safra Center for Ethics at Harvard University, April 26, 2020. Page 13.
[8] 5 million represents 1.5% of the U.S. Population. That percentage of the County's population is about 5,000.
[9] This estimate is based upon the testing levels recommended in the CAP and Safra reports.
[10] ASTI, page 4.
[11] According to CitiSF as of 5/13/2020.
[12] At this time, the County's policy is to provide PPE to nursing homes, EMS workers, HSCM, and the Howard County Health Department.
[13] "A National Plan to Enable Comprehensive COVID-19 Case Finding and Contact Tracing in the U.S." Johns Hopkins Bloomberg School of Public Health, Center for Health Security, April 10, 2020. Page 8.
[14] NGA, page 13.

Meadows, Elizabeth

From: Spicer, Karen
Sent: Monday, May 11, 2020 5:34 PM
To: Spicer, Karen
Subject: Howard County Coronavirus Updates: Virtual Town Hall Wednesday, New Census Dashboard, Pop Up Pantries

The following news release was issued to media outlets this evening.

Howard County Government
News Release

Office of Public Information
3430 Courthouse Drive
Ellicott City, Maryland 21043

410-313-2022 / FAX 410-313-3390 / www.howardcountymd.gov

Scott Peterson
Director of Communications
speterson@howardcountymd.gov

May 11, 2020

Media Contact:
Scott Peterson, Director of Communications, Office of Public Information, 202-277-9412

Coronavirus Updates: Virtual Town Hall Wednesday, New Census Dashboard, Pop Up Pantries

ELLICOTT CITY, MD – Howard County Executive Calvin Ball will host his second Virtual Town Hall on Wednesday, May 13th at 6:30 pm to answer questions and concerns from Howard County residents about COVID-19 and the local response and recovery. The following panelists will join the Town Hall and be available for questions:

- Kelly Cimino, Director, Department of Housing and Community Development
- Raul Delerme, Director, Recreation & Parks
- Mike Hinson, Director, Office of Emergency Management
- Dr. Michael Martirano, HCPSS Superintendent
- Dr. Maura Rossman, Health Officer
- Jackie Scott, Director, Community Resources and Services
- Dr. Ralph Semmel, Director of Johns Hopkins University Applied Physics Laboratory
- Steve Snelgrove, President Howard County General Hospital
- Larry Twele, CEO, Economic Development Authority
- James Zoller, Program Manager, Roving Radish

"As we are about to end our second month of responding and reacting to the devastating impacts of COVID-19 on the health and economy of Howard County, we find ourselves in a period of transition," said Ball. "Even as restrictions for outdoor recreation are eased, we must continue to practice physical distancing by maintaining six feet distance from any persons not from the same household. I also urge residents to wear masks while in public places, especially where they cannot physically

distance. We look forward to engaging with our community and updating residents on how we will navigate the new normal together."

Residents can register online to participate via WebEx or stream live on Facebook. Questions can be asked live, but residents are encouraged to email questions ahead of time to townhall@howardcountymd.gov.

Additionally, today Ball launched the HoCoCounts 2020 Census dashboard, an online tool providing real-time statistics on census completion within Howard County. The dashboard provides the current response rate for Howard County, other Maryland Counties, and Maryland overall. The deadline for completing the census has been extended to October 31, 2020.

"As of May 10, we've seen 72.4% of Howard County residents complete their census since its launch in March, and we're optimistic about ensuring our residents are counted," said Ball. "Information from the census impacts the federal funding that supports critical services and personnel in healthcare, education, emergency management, workforce development and more. This year is the first time the census questionnaire can be completed online, making it easier than ever for residents to respond."

The **Community Action Council (CAC) of Howard County** has created a three-week Pop-Up Food Pantry schedule to support residents in need of groceries. Relief funding from Howard County has allowed CAC to establish a fixed and sustainable schedule to improve public awareness and reduce duplication of effort. CAC plans to distribute 30,000 lbs of food to approximately 4,650 people that will last them for up to five days.

Date	Name	City	Bags
13-May	Port Capital Village	Elkridge	150
14-May	Shalom Square	Columbia	50
15-May	Howard Crossing (formerly Town and Country)	Ellicott City	200
15-May	Longwood Elderly	Columbia	83

Date	Name	City	Bags
20-May	The Seasons Apartment Complex in Laurel	Laurel	200
21-May	Shalom Square	Columbia	50
22-May	Chatham Gardens	Ellicott City	200
22-May	Owen Brown	Columbia	120

Date	Name	City	Bags
27-May	Village at Port Capital	Elkridge	100
28-May	Shalom Square	Columbia	50
29-May	Howard Crossing (formerly Town and Country)	Ellicott City	200
29-May	Phelps Way	Columbia	79

"As communities' transition between response, recovery, and a new normal, we can expect leaders to redefine how success is measured and attained. Our goal is to bring visibility and clarity to what this new world looks like," says Chuck Bubeck, Executive Director of the Maryland Innovation Center. "World 2.0 will be a platform for businesses and entrepreneurs to seek out approaches to adaptation in the post-pandemic landscape."

World 2.0 will be a place for virtual collaboration and connection. To offer new perspectives on adaptation and resiliency to business leaders and entrepreneurs, World 2.0 will feature podcast interviews, videos, and articles in a collective resource library. The site will also offer a virtual town square for business leaders to ask questions and share their experiences throughout the phases of response, recovery, and the new normal.

###

Karen Spicer
Office of Public Information
Howard County Government
3430 Court House Drive
Ellicott City MD 21043
(office) 410-313-2022
(direct) 410-313-0538

Meadows, Elizabeth

From: Trout, Francine
Sent: Friday, May 15, 2020 3:39 PM
To: Meadows, Elizabeth
Cc: Animashaun, Nkechi
Subject: RE: COVID-19 Unemployment for Howard County Question

You're welcome. Here are the past two weeks if you need it.

May 2	*3,502*
May 9	*2,285*

Thanks,

Fran

From: Meadows, Elizabeth
Sent: Friday, May 15, 2020 8:06 AM
To: Trout, Francine <ftrout@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: RE: COVID-19 Unemployment for Howard County Question

Thanks very much!

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census

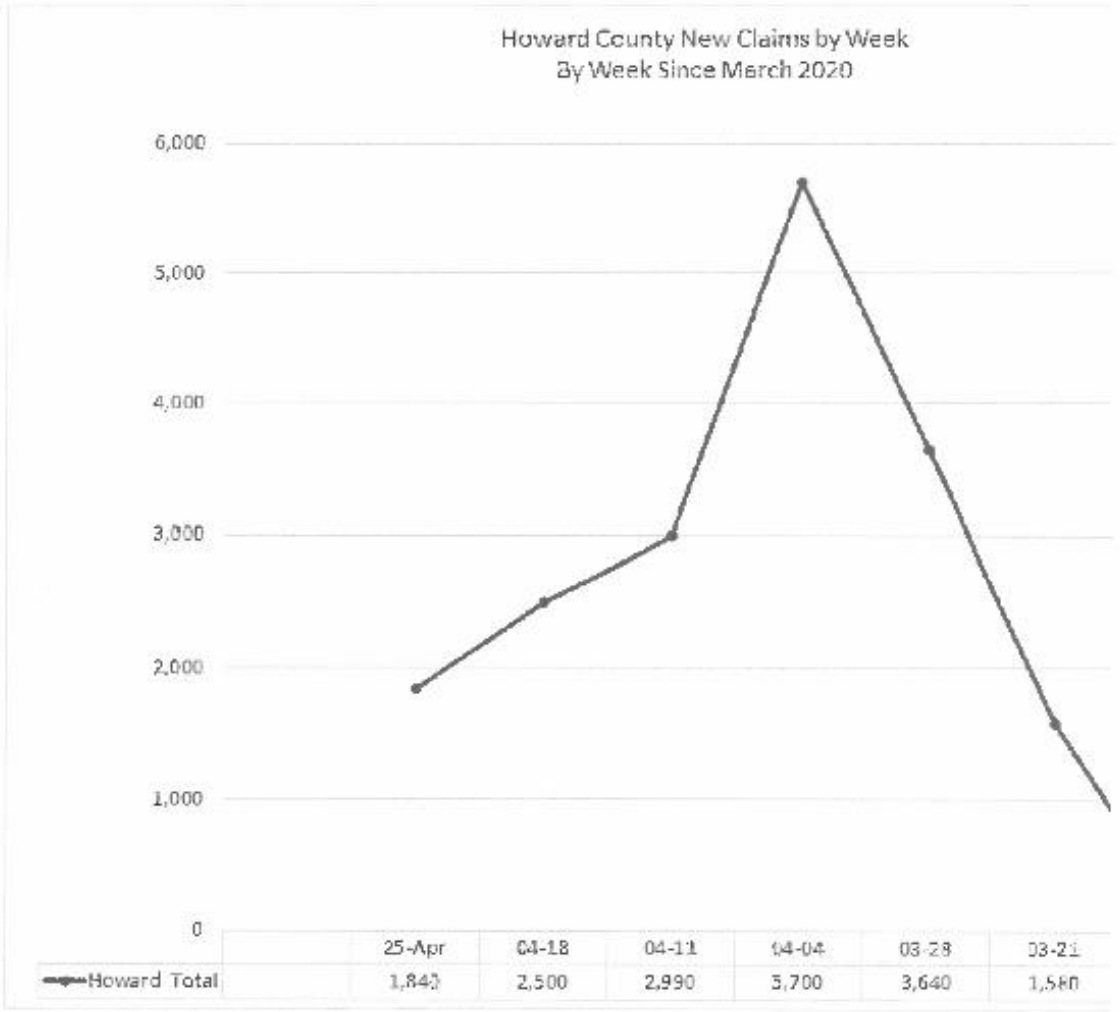
#HøCoCounts 2020 2020CENSUS CensusMaryland

From: Trout, Francine
Sent: Thursday, May 14, 2020 5:44 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: RE: COVID-19 Unemployment for Howard County Question

Hi Elizabeth,

I am hoping that all is well with you too. Please see the chart below.

1



Thanks,

Fran

From: Meadows, Elizabeth
Sent: Wednesday, May 13, 2020 10:37 AM
To: Trout, Francine <ftrout@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: COVID-19 Unemployment for Howard County Question

Hi Fran;

2

I hope this email finds you well. Howard County has been awarded $770,356.00 in CDBG COVID-19 funding through The CARE Act. We are beginning to write our Substantial Amendment for our FFY2019 Annual Action Plan to account for that additional funding. We have always give a picture of the need for low-income and vulnerable residents in Howard County. We anticipate that we will use most of the funding for rental assistance, eviction prevention and utility assistance for those household that have lost their jobs or had their hours cut due to the economic shutdown.

I have been looking on the web for updated Howard County unemployment numbers due to the COVID-19 shutdown to write into this amendment. Would you have that information that you could share with us?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HøCoCounts 2020 CENSUS CensusMaryland

3

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Thursday, May 14, 2020 8:24 AM
To:	'MICHELLE WINEBERG'
Cc:	Anumashaur, Nkechi
Subject:	RE: Rental Assistance

Hi Michelle;

We are currently in the application process now, so the funding is not on streets yet. We anticipate that the Community Action Council of Howard County will be one of the applicants, so they would be a good referral point for you.

To give you some background on this funding. The County has been awarded $770,356.00 in CDBG-CV funding through The CARES Act . The application deadline is Friday, May 22, 2020. We will take those applications to award those funding dollars, and then the County will submit a Substantial Amendment to our current Annual Action Plan to HUD. HUD will approve the plan and then we will have access to the funding.

We hope to have the funds to the nonprofits sometime in June 2020. The nice part about this funding is that our Public Service cap, which is typically capped at 15% of the award, has been waived for our current year (FFY2019) and our upcoming FFY2020 program year. Rental subsidies, eviction prevention and utility assistance are Public Service activities which would have been capped. With the waiving of the Public Service cap we intend to us as much of the funding to help as many Howard County families avoid homelessness as possible.

We are also encouraging as many of our nonprofit landlord, like the Howard County Housing Commission, Bridges to Housing Stability, and The Arc, to apply for this funding to help their clients that have lost employment due to COVID-19 economic shutdown and have not been able to pay rent. We want to help maintain our affordable rental by helping them with missed rental income that they have seen occur in the last several months.

I hope that helps you to know what is happening here with those CDBG-CV funds coming in. Let me know if you any additional questions.

Stay safe. Kind regards, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
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9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HøCoCounts 2020 CENSUS CensusMaryland

1

From: MICHELLE WINEBERG <michelle.wineberg@verizon.net>
Sent: Thursday, May 14, 2020 12:09 AM
To: Meadows, Elizabeth <cmeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: Rental Assistance

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Good Evening,

For a citizen to apply for the Rental Assistance Funding due to COVID that was announced this week, where does one apply? The Grant listed states for non profits, and other companies, but not where a resident should go or contact to receive the rental help. Please advise.

Thank You,
Michelle Wineberg
(301) 362-8535

2

Meadows, Elizabeth

From: Spicer, Karen
Sent: Thursday, May 14, 2020 6:38 PM
To: Spicer, Karen
Subject: Howard County Releases Reopening Framework, Response to Governor's Phase One

Correction to the HoCo RISE link provided https://www.howardcountymd.gov/Portals/0/HoCoRISE_V2.pdf?ver=2020-05-14-180437-437

The following news release was issued to media outlets this evening.

Howard County Government
News Release

Office of Public Information
3430 Courthouse Drive
Ellicott City, Maryland 21043

410-313-2022 / FAX 410-313-3390 / www.howardcountymd.gov

Scott Peterson
Director of Communications
speterson@howardcountymd.gov

May 14, 2020

Media Contact:
Scott Peterson, Director of Communications, Office of Public Information, 202-277-9412

Howard County Releases Reopening Framework, Response to Governor's Phase One

ELLICOTT CITY, MD – Howard County Executive Calvin Ball announced today his framework for reopening, HoCo RISE, **R**eopening **I**nnovatively, **S**afely, and **E**ffectively. Based on HoCo RISE, Ball also released guidance to Howard County residents, businesses, and organizations on what will remain closed and what will reopen Friday, May 15th at 5 p.m. To view the complete HoCo RISE framework, please click here.

"HoCo RISE provides additional data points that are specific to Howard County, our hospital, and our infrastructure to combat COVID-19," said Ball. "We're a data-informed, people-driven community and this framework will allow us to make thoughtful decisions about how to responsibly reopen."

Ball continued, "At this point, we have made progress and are on track to continue increasing contact tracing and testing. However, there are still concerns about our proximity to counties with much higher case rates, our ability to access testing reagents, and whether we will be able to sustain this progress. The Governor's announcement came as a bit of surprise. We did not expect him to go as far as he did, especially in areas like religious gatherings."

"We recognize the significant burden our residents, workers, and businesses have faced over the past six weeks. This week, another 3,199 residents filed for unemployment insurance and pandemic unemployment assistance, bringing Howard County's total unemployment claims to more than

Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Wednesday, May 13, 2020 10:12 AM
To: 'Dana Sohr'; Animashaun, Nkechi
Subject: RE: CDBG-CV funds - question
Attachments: Copy of CDBG - 2019 income limits by Baltimore FO jurisdiction (effective 6-28-2019) (003).xlsx

Hi Dana:

Yes absolutely you can work with your Alliance clients for this rental subsidy. The COVID-19 pandemic has changed everything and these families have been impacted to no fault of their own. Also, landlord have also been impacted to no fault of their own too. We anticipate a few nonprofit landlords will be applying for rental subsidies for their own clients as well.

With CDBG funding you can pay up to 3 consecutive months of rental subsidies. The missing months your clients have not been able to pay due to the COVID-19 shut down which caused them to lose job or hours at work causing a loss in income. I have included the FFY2019 Income Limits for you.

Let us know if any questions.

Thanks, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HoCoCounts 2020 CENSUS CensusMaryland

From: Dana Sohr <Dana@bridges2hs.org>
Sent: Wednesday, May 13, 2020 9:40 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>; Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: CDBG-CV funds - question

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hi ladies, we're working on the CDBG-CV application. Amongst the many hundreds of moderate/low-income households that might ultimately receive assistance from this grant plus the additional funds the County has committed, we have a question about one subset of households: the clients in our Alliance program. Of the 42

households in the program, 12 are suffering economic hardship from the pandemic, and some might be candidates for rental assistance. However, Alliance households are currently unable to seek rental assistance from the Coordinated System or CAC. That's been the policy for the past 5 or 6 years, based on an apparent presumption that Alliance clients already receive enough help by virtue of the below-market rents that our funding makes possible.

So our question: If Bridges is selected to help distribute CDBG-CV rental assistance funds, could we provide some of the funds to Alliance clients? We don't want to create the perception that we are "paying ourselves," but the reality is that households that can't pay rent in the Alliance program ultimately face eviction just like any other household. We have been raising funds in the community specifically for rental assistance to these households, but so far have not received the level of donations that will be needed.

I want to stress that our grant application will target a much larger number of households, far broader than just the Alliance households in need. But we'd like to get clarification before we finalize our estimates for the grant application.

Thank you for any insights you can provide.

Best wishes,
Dana

Dana Sohr
Program Manager, Bridges Alliance
cell: 240-205-2493 desk: 410-312-5760 x104 fax: 410-312-5765

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to Housing Stability

Solving Homelessness with Housing

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Meadows, Elizabeth

From: Spicer, Karen
Sent: Friday, May 8, 2020 11:01 AM
To: Spicer, Karen
Subject: Howard County Allocates Food and Rental Relief Funding

The following news release was issued to media outlets this morning.

Howard County Government
News Release

Office of Public Information
3430 Courthouse Drive
Ellicott City, Maryland 21043

410-313-2022 / FAX 410-313-3390 / www.howardcountymd.gov

Scott Peterson
Director of Communications
speterson@howardcountymd.gov

May 8, 2020

Media Contact:
Scott Peterson, Director of Communications, Office of Public Information, 202-277-9412

Howard County Allocates Food and Rental Relief Funding

ELLICOTT CITY, MD – County Executive Calvin Ball has designated $200k in relief funds to the Community Action Council (CAC) for food assistance in Howard County. The funds are part of the initial $500k Disaster Relief and Recovery Initiative in his proposed Fiscal Year 2021 operating budget and are subject to the approval of the County Council. Howard County has also allocated $800k in County funding for rental assistance and eviction relief for low- and moderate-income families, with $300K coming from the Disaster Relief and Recovery Initiative in the proposed budget and $500k coming from Moderate Income Housing Unit (MIHU) fee-in-lieu revenue sources. These funds will be in addition to the anticipated $770k in Community Development Block Grants (CDBG) program funds received directly from the federal government under the CARES Act.

"As we continue to battle this virus, we must put into place adequate support programs and infrastructure to make sure no one falls through the cracks," said Ball. "With more than 23,000 renters in the county, the need for rental assistance and eviction prevention will likely exceed what we've received in federal relief, which is why we're allocating an additional $800k. Moreover, we've seen nearly 23,000 residents file for unemployment since March making food insecurity a critical issue for our residents, this relief funding will provide much-needed support to our local food bank working on the front line."

"We are delighted to receive this significant and impactful support from County Executive Ball. This contribution, once again, demonstrates County Executive Ball 's strong commitment to the most vulnerable residents in our county," said Bita Dayoff, President of Community Action Council of Howard County. "Furthermore, this grant will enable CAC to continue to meet the monumental challenge and humanitarian crisis that has been caused by the coronavirus. In just six weeks, since

mid-March, the Howard County Food Bank has served more than 12,000 individuals who unexpectedly found themselves in the midst of a financial crisis which left their families in danger of hunger and potential homelessness."

To satisfy the statutory requirements of the CDBG program to distribute the federal funds, the County will be submitting a substantial amendment to its FY2019 Annual Action Plan and will host a series of public hearings via WebEx identifying the immediate needs, discuss potential actions to meet these needs and provide instructions on how to apply for CDBG funds under the CARES Act. The application deadline is May 22, 2020. Details on the grants can be found here.

The additional $800k in County funding will provide additional rental assistance and eviction prevention resources to help low- and moderate-income families maintain housing stability. The Housing Department will use the same CDBG application request and process to award these funds to our nonprofit housing partners, so they can distribute it to residents as quickly as possible.

"Our nonprofit partners are telling us that the County's low- and moderate-income families are struggling. If they are not able to work, they are not able to pay their rent" said Kelly Cimino, Department of Housing Director. "When the emergency order is lifted, many families could be facing homelessness. We want to do what we can to help families pay their rent and stay in their existing homes."

The Coronavirus Aid, Relief and Economic Security Act (CARES Act) was signed into law on March 27, 2020, and made $5 billion in supplemental Community Development Block Grant (CDBG) funds available to entitlement jurisdictions. A provision in the CARES Act requires that expenditures be incurred "due to" the public health emergency means that expenditures must be used for actions taken to respond to the public health emergency. These may include expenditures incurred to allow the State, territorial, local, or Tribal government to respond directly to the emergency, such as by addressing medical or public health needs, as well as expenditures incurred to respond to second-order effects of the emergency, such as by providing economic support to those suffering from employment or business interruptions due to COVID-19-related business closures.

###

Karen Spicer
Office of Public Information
Howard County Government
3430 Court House Drive
Ellicott City MD 21043
(office) 410-313-2022
(direct) 410-313-0538

2

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Friday, May 8, 2020 8:24 AM
To:	Cindy Parr; Peter Engel; Donna Sturdivant; Dayhoff, Bita
Cc:	Animashaun, Nkechi; Scruggs, Delavago; Barbara Coleman (bcoleman@mdlab.org)
Subject:	Clarification for Rental Subsidies with CDBG-CV
Attachments:	Copy of CDBG - 2019 income limits by Baltimore FO jurisdiction (effective 6 28 2019) (003).xlsx

Good morning Everyone;

After a phone call with Nkechi after the WebEx call yesterday I realized I misunderstood what was being asked. With CDBG funding, rental subsidies can be funded up to 3 months of rental assistance. So you are able to pay missed rental up to 3 months of assistance. **Also,** utility assistance is an eligible activity as well as eviction prevention. This information should help as you are writing the application for CDBG-CV funding.

I have also included with this email the 2019 CDBG Income Limits that you will need to use. Our jurisdiction is at top of the chart highlighted in yellow. This way you will be able to determine which of your clients are eligible.

I apologize for the confusion. Please let me know if you have any questions.

Thanks, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census

1

page 1

CDBG Program Income Limits 2019
[effective June 28, 2019]

Baltimore-Columbia-Towson, MD MSA
(pertinent jurisdictions shown on page 5)

1-person	2-person	3-person	4-person	5-person	6-person	7-person	8-person
extremely low-income - 30% of Median	21250	24250	27300	30300	32750	35150	37600	40000
low income - 50% of Median	35350	40400	45450	50500	54550	58600	62650	66700
moderate income - 80% of Median	52850	60400	67950	75500	81550	87600	93650	99700

California-Lexington Park, MD MSA
(St. Mary's County)

1-person	2-person	3-person	4-person	5-person	6-person	7-person	8-person
extremely low-income - 30% of Median	21350	24400	27450	30500	32950	35400	37850	40300
low income - 50% of Median	35600	40700	45800	50850	54950	59000	63100	67150
moderate income - 80% of Median	52850	60400	67950	75500	81550	87600	93650	99700

Cumberland, MD-WV MSA
(Allegany County)

1-person	2-person	3-person	4-person	5-person	6-person	7-person	8-person
extremely low-income - 30% of Median	14350	16400	18450	20500	22150	23800	25450	27100
low income - 50% of Median	23950	27400	30800	34200	36950	39700	42450	45150
moderate income - 80% of Median	38300	43800	49250	54700	59100	63500	67850	72250

Meadows, Elizabeth

From: Kareem, Quanita
Sent: Thursday, May 7, 2020 11:52 AM
To: Meadows, Elizabeth; Animashaun, Nkechi
Subject: This Afternoon

Here is a screenshot of today's attendees. I think I should give the "technical part" in the very beginning.

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive
Suite 224
Columbia, MD 21046
Direct Dial: 410-313-3386
Fax No.: 410-313-5960
qkareem@howardcountymd.gov

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MARYLAND

Calvin Ball, County Executive

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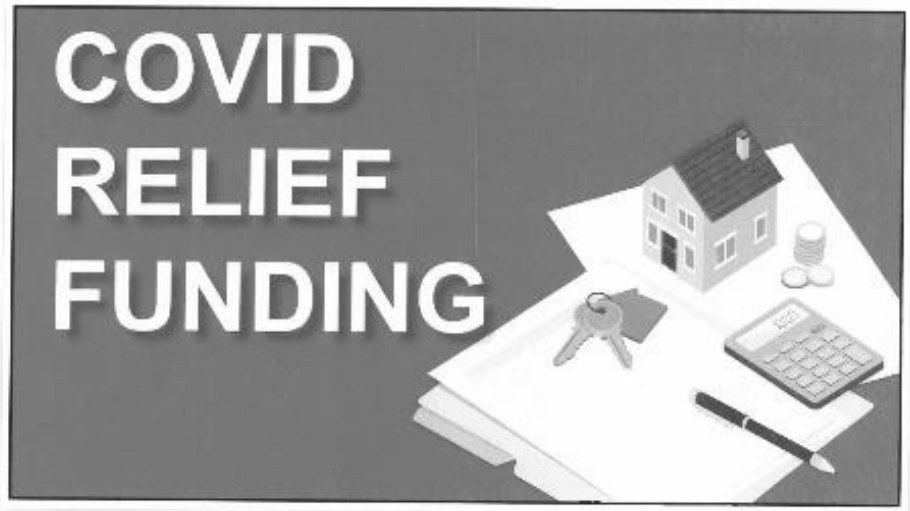

May 8, 2020

Media Contact:

Scott Peterson, Director of Communications, Office of Public Information, 202-277 9412

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"As we continue to battle this virus, we must put into place adequate support programs and infrastructure to make sure no one falls through the cracks," said Ball. "With more than 23,000 renters in the county, the need for rental assistance and eviction prevention will likely exceed what we've received in federal relief, which is why we're allocating an additional $800k. Moreover, we've seen nearly 23,000 residents file for unemployment since March making food insecurity a critical issue for our residents, this relief funding will provide much-needed support to our local food bank working on the front line."

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"Our nonprofit partners are telling us that the County's low- and moderate-income families are struggling. If they are not able to work, they are not able to pay their rent" said Kelly Cimino, Department of Housing Director. "When the emergency order is lifted, many families could be facing homelessness. We want to do what we can to help families pay their rent and stay in their existing homes."

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Tags

Coronavirus , COVID-19 , Calvin Ball , Community Action Council , Disaster Relief , Disaster Relief and Recovery Initiative , MIHU , CDBG , Block Grants , CARES Act , Housing

Related

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- County Executive Kittleman's schedules 2nd FY17 Citizens' Budget Hearing for March 14th 2/22/2016
- Credentialing for access to Ellicott City flood area moving to St. Peter's Episcopal Church Wednesday 5/29/2018
- Governor Hogan, Executive Kittleman break ground on $37.5 million Route 32 widening project 8/31/2017
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- Ellicott City North Tunnel Project Site Investigation to Begin 1/20/2019

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George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

ask@howardcountymd.gov

Follow us

Meadows, Elizabeth

From: Kareem, Quanita
Sent: Tuesday, May 5, 2020 9:35 AM
To: Meadows, Elizabeth; Animashaun, Nkechi
Subject: Attendees for today

Good morning Ladies

Here's a screenshot of those signed up for today. Just thought it might be helpful in case you can't see all the names

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive
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Columbia, MD 21046
Direct Dial: 410-313-3386
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2

Meadows, Elizabeth

From: Grace Morris <gmorris@hhpcorp.org>
Sent: Tuesday, May 5, 2020 10:54 AM
To: Meadows, Elizabeth
Subject: Re: Your Mike is Muted / We can't hear you

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Don't know what happened there So sorry!

So I was saying that our main concern at the two HUD project based properties (Shalom Square which is our 50 unit project for seniors/disabled and St Matthew House which is 15 units for the physically disabled and 2 "market" rate units) has been food but that our resident services coordinator has been working with a variety of resources in the county to bring food and meals to the residents.

My main concern is the residents at Oakland Place who are not in MIHU units or on a voucher. Those are people who have been working and running small businesses and now they are not working and not open for business. We are working with them now to agree that when we are on the other side of the pandemic that we will come up with a mutually agreeable solution for repaying the rent owed. Right now I am aware of 4 families out of 12 units that are facing such challenges. I have given them until May 15th to get me paperwork for the agreement.

However, in the meantime, we need to pay a monthly mortgage payment and were trying to escrow for taxes and insurance which we cannot do at this time due to the lack of funds So that will have to be covered by HHP out of a rainy day fund which has shrunk dramatically due to the stock market fluctuations. The longer this lasts the bigger the hole those renters are going to be in and the harder it will be for them to climb out of it. As of last week several of them still had not received unemployment or the stimulus check which in our county will not take them very far.

We will look at the application and see if there is something we can request to support all of our residents.

Thank you for the opportunity.

Take care.

In accordance with Gov. Hogan's recent COVID-19 Order concerning MD businesses, Heritage Housing Partners will remain open for business as an essential service. However wherever possible our professional and support staff will be working from home but will continue to provide essential services to our clients and our communities. We are available via email and/or phone as noted in the signature block below. We hope that you stay well during this difficult time.

Thank you.

Sincerely,
Grace Morris
Grace A. Morris, Executive Director
Heritage Housing Partners, Corp.
9770 Patuxent Woods Drive

1

Mail stop 305
Columbia, MD 21046
443-518-7687 (direct)
www.hhpcorp.org
Owner | Manager | Developer

"It is not the honor you take with you but the HERITAGE you leave behind" – Branch Rickey

This message (including any attachments) is intended for a specific individual and purpose, and is protected by law. If you are not the intended recipient, you should delete this message and are hereby notified that any disclosure, copying, or distribution of this message, or the taking of any action based on it, is strictly prohibited.

On Tue, May 5, 2020 at 10:19 AM Meadows, Elizabeth <emeadows@howardcountymd.gov> wrote:

M. Elizabeth Meadows, Chief

Community Planning and Grants

HOWARD COUNTY DEPARTMENT OF

HOUSING AND COMMUNITY DEVELOPMENT

9820 Patuxent Woods Drive, Suite 224

Direct Dial: 410-313-6324

emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census

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CDBG-CV Needs Hearing #1
Hosted by Diantte Karnam
Thursday, Apr 30 2020
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Meeting information
More ways to join

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

Departments

Community Planning and Grants

What are our Grants?

Our Department receives funding from the U.S. Department of Housing and Urban Development (HUD) and administers those grants to non-profits who work directly with residents of Howard County. The County receives Community Development Block Grants (CDBG) and HOME funds.

DHCD Grant Items

COVID-19 CDBG NEEDS HEARING INVITATION

On March 27, 2020 President Trump signed into law, *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act) which will ultimately make available $5 billion in supplemental Community Development Block Grant (CDBG) funds, which will be used for grants to prevent, prepare for, and respond to the coronavirus.

Howard County has been awarded an additional ***$770,356.00*** in CDBG program funds. To satisfy the statutory requirements of the CDBG program, the County will be doing a substantial amendment to its FFY2019 Annual Action Plan.

As a result, the County will host a series of public hearings via WebEx to inform the preparation of this substantial amendment by identifying the immediate needs within the County, discuss potential actions to meet these needs and how to apply for CDBG funds under the CARES Act. Your input is vital.

Below is a list of meeting dates and times which will be hosted via WebEx. It is highly suggested to use the "dial in" process.

Thursday 30, April 2020 1:00--3:00pm

Tuesday 5, May 2020 10am- 12noon

Thursday 7, May 2020 2:00--4:00pm

Once you've decided which date and time work for you, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov to receive the WebEx link and code for the corresponding meeting. Please feel free to share this information with other local non-profit service providers that serve populations largely affected by the current health crisis.

Link to Meeting Agenda

CARES ACT CDBG-CV Funding Application FFY2019

Program Description: On March 27, 2020 President Trump signed into law, *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act) which will ultimately make available $5 billion in supplemental Community Development Block Grant (CDBG) funds, which will be used for grants to ***prevent, prepare for,*** and ***respond to*** the coronavirus. An allocation of ***$770, 356*** in CDBG-CV funds has been awarded to Howard County, which will be available in the form of grants to local non-profits. Click here for the application . If you need a Word version, please email Nkechi Animashaun at nanimashaun@howardcountymd.gov and she can provide you one.

NOTICE OF PUBLIC HEARING - April 23, 2020

Amended Citizen Participation Plan (CPP)

PUBLIC NOTICE OF PUBLIC COMMENT PERIOD

The Howard County Department of Housing and Community Development (DHCD) gives notice that it has amended its Citizen Participation Plan (CPP) for programs covered under the Consolidated Plan as required by the U.S. Department of Housing and Community Development (HUD). Click here for the Notice .

Howard County's Amended Citizen's Participation Plan

The Department of Housing and Community Development has amended its Citizen Participation Plan (CCP). The CPP provides and encourages Howard County residents to participate in the development and review of the Consolidated Plan, The Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH), and the Disaster Relief Citizen Participation Planning (DRPP). The draft Amended CPP.

DRAFT FFY2020 - FFY2024 CONSOLIDATED PLAN & FFY2020 ANNUAL ACTION PLAN

Fair Housing Analysis

Approved FFY2019 Annual Action Plan

FFY2018 DRAFT Consolidated Annual Performance and Evaluation Report (FFY18 DRAFT CAPER)

HOME Program Policy Guide

Approved FFY2016-FFY2019 Consolidated Plan / FFY2016 Annual Action Plan

Howard County, Maryland
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043
ask@howardcountymd.gov

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Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Friday, May 1, 2020 1:16 PM
To: 'Denise Giuliano'
Subject: RE: CDBG

Hi Denise;

I'm really sorry that happened to you during the call yesterday. I had the exact thing happen to me during a call yesterday morning, so I know the frustration.

Thanks for sending these comments. It really helps us to know what our nonprofits are dealing with as they work with Howard County residents. The people you serve are a really important voice to have at the table when we do our needs hearings. So I hope you and NAMI will stay engage with our planning process we do each year.

CSP Grant is really a good fit for NAMI. I refer a lot of nonprofits to that program. The beautiful thing about it is that those are County dollars, so they don't quite as many regulations tied to them as some federal pots of money do. And DCRS is such good partners at the table.

Stay healthy! Kind regards, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HøCoCounts 2020
2020CENSUS CensusMaryland

From: Denise Giuliano <dgiuliano.namihc@gmail.com>
Sent: Friday, May 1, 2020 12:53 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: CDBG

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hi Elizabeth --

I was on the call yesterday but seemed to have some audio difficulties. When I went to speak no one could hear me and my mute was off.

I did not have much to add though. NAMI HC provides free education classes and support groups to individuals and families living with mental illness. We do not provide direct crisis services so we currently do not have financial needs that aren't met. Therefore, I will not be applying for the CDBG funds. It was interesting for me to hear about the status of other agencies though. Like others, we have seen a sharp decline in our "warm" line calls, which has been surprising.

Going forward, I am more concerned with grants funds for FY21. We currently receive two important grants from the Health Department and a CSP grant from the County. They make up about 40% of our budget so it's significant.

Thanks for all you do to support our non-profits.

--
Denise M. Giuliano
Executive Director
National Alliance on Mental Illness (NAMI) of Howard County
9650 Santiago Rd., Suite 1
Columbia, MD 21045
https://namihowardcounty.org
(410) 772-9300 -- Fax (410)772-9307

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Tuesday, April 28, 2020 11:54 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi
Subject:	COVID-19 CDBG Needs Hearings Narrative and Agenda for Website
Attachments:	COVID-19 CDBG Needs Hearings Invitation for Webpage.docx; COVID-19 Needs Hearings Agenda.docx

Hi Quanita;

Attached to this email are 2 documents for the website. Kelly has approved them to be in the Announcement section of Housing's main page and we also want them on Grants webpage. I need the Needs Hearing narrative at the top of our page, and you will see that the Agenda gets accessed through a link in the narrative. Is this suitable for Facebook?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census

#HoCoCounts 2020 2020 CENSUS CensusMaryland

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COVID-19 CDBG NEEDS HEARING INVITATION

On March 27, 2020 President Trump signed into law, *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act) which will ultimately make available $5 billion in supplemental Community Development Block Grant (CDBG) funds, which will be used for grants to prevent, prepare for, and respond to the coronavirus.

Howard County has been awarded an additional ***$770,356.00*** in CDBG program funds. To satisfy the statutory requirements of the CDBG program, the County will be doing a substantial amendment to its FFY2019 Annual Action Plan.

As a result, the County will host a series of public hearings via WebEx to inform the preparation of this substantial amendment by identifying the immediate needs within the County, discuss potential actions to meet these needs and how to apply for CDBG funds under the CARES Act. Your input is vital.

Below is a list of meeting dates and times that each WebEx will be held.

Thursday 30, April 2020 1:00–3:00pm

Tuesday 5, May 2020 10am- 12noon

Thursday 7, May 2020 2:00–4:00pm

Once you've decided which date and time work for you, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the corresponding meeting. Please feel free to share this email with other local non-profit service providers that serve populations largely affected by the current health crisis.

Link to Meeting Agenda

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay

Kelly A. Cimino, Director FAX 410 313-5960

Community Planning and Grants Division
COVID-19 Needs Hearings
WebEx Conference Calls
AGENDA

Dates & Times of Calls

1. Thursday, April 30, 2020 – 1:00 PM – 3:00 PM
2. Tuesday, May 5, 2020 – 10:00 AM – 12 Noon
3. Thursday, May 7, 2020 – 2:00 PM – 4:00 PM

The CARES Act

Contained in The CARES Act is the requirement that expenditures be incurred "due to" the public health emergency means that expenditures must be used for actions taken to respond to the public health emergency. These may include expenditures incurred to allow the State, territorial, local, or Tribal government to respond directly to the emergency, such as by addressing medical or public health needs, as well as expenditures incurred to respond to second-order effects of the emergency, *such as by providing economic support to those suffering from employment or business interruptions due to COVID-19-related business closures.*

Framework of Call:

- Name and the organization you represent.
- What are the struggles your clients are identifying to your organization since the COVID-19 State of Emergency was declared in mid-March?
- What is the significant impact this shut-down has had on your organization?

Another Way to Provide Comments or Concerns:

If time does not allow for everyone to be given a chance to speak, please feel free to provide comments by email to Elizabeth Meadows, Chief of Community Planning and Grants, at emeadows@howardcountymd.gov. Please use the framing questions above to provide your comments related to the impact of COVID-19 state of emergency on low-income Howard County residents.

Next Steps:

- Application Process – Nkechi Animashaun
- Due to the extreme need to get the funding out to the community, nonprofits must have an established process in place. This CDBG-CV funding is not for establishing a new program.
- **Applications Due Date: Friday, May 22, 2020 at 5:00 PM**

Meadows, Elizabeth

From:	Kareem, Quanita
Sent:	Thursday, April 30, 2020 2:03 PM
To:	Ayesha Holmes; Garrett, Cornelius Manning; Dana Soar; Diana Ellis; Denise Giuliano; Eric Thomas; Burns, Gayle; Jennifer Broderick; Marcia Reichert; q_mbangazwe@yahoo.co.uk; Theresa Thomas
Cc:	Meadows, Elizabeth; Animashaun, Nkechi
Subject:	Meeting Attendees - CDBG-CV Needs Hearing

Thank you to all who participated today and we apologize for the slight technical difficulties. Once the application is complete - it will be on the Department's webpage at - https://www.howardcountymd.gov/housing_grants I missed the "underscore" when I spoke.

Thank you again for your input.

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive
Suite 224
Columbia, MD 21046
Direct Dial: 410-313-3386
Fax No.: 410-313-5960
qkareem@howardcountymd.gov

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CLICK HERE FOR COVID-19 HOUSING UPDATES

1

Meadows, Elizabeth

From: Animashaun, Nkechi
Sent: Monday, April 27, 2020 4:22 PM
Cc: Kareem, Quanita; Meadows, Elizabeth
Subject: CARES Act Public Hearings Via WebEx

Importance: High

Hello,

On March 27, 2020 President Trump signed into law, *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act) which will ultimately make available $5 billion in supplemental Community Development Block Grant (CDBG) funds. These funds will be used as grants to prevent, prepare for, and respond to the coronavirus.

Howard County has been awarded an additional ***$770,356.00*** in CDBG program funds. To satisfy the statutory requirements of the CDBG program, the County will be doing a substantial amendment to its FFY2019 Annual Action Plan. As a result, the County will host a series of public hearings via WebEx to inform the preparation of this substantial amendment by identifying the immediate needs within the County, discussing potential actions to meet these needs and, how to apply for CDBG funds under the CARES Act. Your input and participation is vital.

In order for everyone to have an opportunity to participate, the County has set up three (3) dates and times to host virtual public hearings; they are listed below.

Thursday 30, April 2020 1:00–3:00pm

Tuesday 5, May 2020 10am-12noon

Thursday 7, May 2020 2:00--4:00pm

Once you've decided which date and time work for you, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the corresponding meeting. Please feel free to share this email with other local non-profit service providers that serve populations largely affected by the current health crisis.

Thank you so much for your assistance and participation, and if you have any additional questions, please let me know.

Kind Regards,

1

Nkechi M. Animashaun, HOME Program Specialist

HOWARD COUNTY DEPARTMENT OF HOUSING
AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Columbia MD 21046.
Direct Dial 410-313-3693
nanimashaun@howardcountymd.gov

2

Meadows, Elizabeth

From: Spicer, Karen
Sent: Friday, April 17, 2020 5:49 PM
To: Spicer, Karen
Subject: Coronavirus Updates: Howard County Receives Federal Grants for Housing, Special Election Voting Guidance, SNAP Benefits

The following news release was issued to media outlets this evening.

Howard County Government
News Release

Office of Public Information
3430 Courthouse Drive
Ellicott City, Maryland 21043

410-313-2022 / FAX 410-313-3390 / www.howardcountymd.gov

Scott Peterson
Director of Communications
speterson@howardcountymd.gov

April 17, 2020

Media Contact:
Scott Peterson, Director of Communications, Office of Public Information, 202-277-9412

Coronavirus Updates: Howard County Receives Federal Grants for Housing, Special Election Voting Guidance, SNAP Benefits

ELLICOTT CITY, MD –Howard County received $770k in federal Community Development Block Grant (CDBG) funds to be used in response to the COVID-19 outbreak. The County is planning to grant these funds to housing providers (such as the Housing Commission, Bridges to Housing Stability, Heritage Housing Partners and Community Action Council) to provide rent assistance to tenants that could be facing eviction for non-payment of rent due to COVID-19.

"These funds are critical in supporting our residents who have experienced a loss of income and are unable to pay rent," said County Executive Calvin Ball. "We're incredibly grateful to our Congressional Delegation who were instrumental in ensuring critical relief to those hit the hardest by COVID-19 mitigation measures."

Additional CDBG funds will be awarded to some of these same non-profits after July 1st to continue to provide rental assistance and eviction prevention. The County is also allocating additional funding of $37,000 to Making Change, Inc., a nonprofit credit counseling agency in the County, to help residents with budgeting strategies and assistance contacting creditors as they recover from income loss or medical illness.

Lost Ark Distilling Visit
Today, County Executive Calvin Ball visited Lost Ark Distilling in Columbia to thank them for their work in making hand sanitizer. Howard County Government is utilizing local businesses and vendors

to meet our urgent, emergency needs during the coronavirus response. Lost Ark Distilling was among the first companies to switch from distilling spirits to making the much-needed hand sanitizer. Video from the visit can be found here.

Howard County Government is purchasing a total of 500 gallons of the hand sanitizer from Lost Ark. Including today's pickup, the County has obtained 250 gallons so far. Lost Ark is processing a second order of 250 gallons and hopes to have that ready for Howard County Government by the week of April 27th.

Department of Recreation & Parks has extended their closures of the following through May 15th:

- All program, classes, and events
- Spring Break camps
- Leagues
- Rentals
- Recreation & Parks indoor facilities (This includes HCRP headquarters, Roger Carter Community Center, Gary J. Arthur Community Center, North Laurel Community Center, Robinson Nature Center, Baltimore & Ohio Ellicott City Station Museum, Firehouse Museum, Meadowbrook Athletic Complex, Kiwanis-Wallas Hall, Belmont Manor & Historic Park and more.)

All weddings on Recreation & Parks facilities are cancelled until June 1, 2020.

Howard County Public School System closures were extended through May 15th today by Maryland State Superintendent Karen Salmon. HCPSS communications to families can be read here.

Special Election Voting Guidance
There will be a special general election in Maryland's 7th Congressional District to fill the remainder of Congressman Elijah Cummings' term of office, held on April 28th. The State Board of elections is providing three ways to vote in the special election, including vote by mail, which is strongly recommended. For additional information, please visit their website here.

Vote by Mail
To slow the spread of COVID-19, all voters in the 7th Congressional District are strongly encouraged to vote by mail. The process is secure and the most effective way to slow the spread of the novel coronavirus.

To ensure everyone has an opportunity to vote, all voters in the 7th Congressional District will receive a mail-in ballot and can return it by mail. To vote by mail:

- Ballots were mailed on April 8, 2020.
- Vote your ballot, fill in the oval to the left of your candidate choice.
- Sign and date the oath on the envelope using black ink.
- Return your voted ballot by mail or deliver it to a secure drop box location.
- No stamp is required.
- Make sure your ballot is postmarked on or before April 28, 2020 or delivered to a drop box location by 8 pm on Tuesday, April 28th. Drop box locations will be finalized by Monday, April 20th.

If you did not receive a ballot, please contact your local board of elections.

In-Person Voting

2

To ensure that all voters have an opportunity to vote, there will be three in-person voting locations on April 28, 2020 for voters to cast their ballots. These locations will be open from 7 am to 8 pm.

For Howard County voters who live in the 7th Congressional District, the polling location is at the Howard County Fairgrounds, 2210 Fairgrounds Road, West Friendship 21794.

SNAP Benefits

The Howard County Department of Social Services has seen a surge in applications for key public benefits including the Supplemental Nutrition Assistance Program (SNAP) or food stamps, Temporary Cash Assistance and Medicaid.

The ongoing economic impact from the COVID-19 shutdown has resulted in more than double the number of applications for a typical 30-day period for the Department. These critical safety net programs are important in making sure individuals and families have access to food, health care, and other basic needs.

To further support vulnerable Marylanders during COVID-19, **eligible** SNAP households are receiving additional benefits in April and May. To find out if you meet the financial eligibility requirements for SNAP benefits, please click here. To apply for SNAP, visit https://mydhrbenefits.dhr.state.md.us/.

###

Karen Spicer
Public Information Specialist
Howard County Government
3430 Court House Drive
Ellicott City, MD 21043
410-313-2022 (office)
410-313-0538 (direct)
410-313-3390 (fax)
https://www.facebook.com/hocogov
https://twitter.com/hocogov

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Monday, April 20, 2020 11:42 AM
To:	Ellen Harris (ceharris@baltsun.com); Fox, Rodney; Patuxent Legals Email (cnglegal@tronc.com)
Cc:	Animashaun, Nkechi; Wall, Thomas F; Delk, Tracy
Subject:	Public Notice
Attachments:	PUBLIC NOTICE_FFY2019 CPP Amendment, 30 day.docx

Good Morning:

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **April 26, 2020** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

www.HowardCountyMD.gov/2020census
#HoCoCounts 2020 CENSUS CensusMaryland

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director
FAX 410-313-5960

PUBLIC NOTICE
AND
NOTICE OF PUBLIC HEARING

Howard County Dept. of Housing and Community Development
9820 Patuxent Woods Drive
Columbia, MD 21046

April 23, 2020

The Howard County Department of Housing and Community Development (DHCD) gives notice that it has amended its Citizen Participation Plan (CPP) for programs covered under the Consolidated Plan as required by the U.S. Department of Housing and Community Development (HUD). The CPP provides and encourages Howard County residents to participate in the development and review of the Consolidated Plan, The Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH). Howard County DHCD invites all interested citizens, community groups, agencies and organizations to provide your comments regarding the Amended CPP. A copy of the Amended CPP is available for review and comment from May 1, 2020 to June 1, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/

Public Hearing Date and Location

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council, were closed to the public until further notice. Government operations are continuing through teleworking. To provide comments or concerns for the amended CPP, through email or in writing to the information below:

Email: housing@howardcountymd.gov.
Address: 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046

Comment Due Date: June 1, 2020 by 5:00PM

Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in notice above. Written comments must be received no later than 5:00 pm on the date of the Hearing and all comments must be received by the end of the thirty (30) day Public Comment Period. (June 1, 2020).

FFY2019 AAP NEEDS HEARING # 1 MEETING NOTES

Howard County, Maryland
Needs Hearing # 1 – FFY2019 Annual Action Plan Planning Session
Date: Thursday, December 6, 2018 at 1:30 pm

In attendance:
See attached sign-in sheet

Agenda:
Greeting from Director Cimino
Introductions of Staff
Overview of Process
Action Plan Process and Timeline
Non-profit Roundtable for Briefing County Staff on Needs
Survey Discussion
Next Meeting – January 10, 2019

- **Community Action Council of Howard County**
- **Homeless Prevention** funding for households above 30% AMI is getting more difficult to find. Using CDBG and the County's Community Services Partnership (CSP) funding for preventing households from being evicted.
- With the State collapsing their homeless funding the agency is being forced to look at non-traditional funders than before.
- When working with household, due to tightening funds, the agency is not able to put enough funding into the financial crisis to stabilize the household.

Special Needs Populations –

- **The Arc of Howard County**
  - Particular challenge again this year is rehabilitation work needed to the agency building dedicated to serve persons with disabilities. The aging roof of the building needs to be replaced and interior water damage repaired.
- Funding from State Disability Determination Service (DDS) and Medicare done on reimbursement bases
- Uncertain funding from the Maryland Developmental Disabilities Administration (DDA)
- Regulations from the State require individual leases with all their clients. This make it more difficult to serve more clients due to the regulations.
- Clients are really hard on the residential houses.
- Because of the additional requirements placed on the agency now, and because of the high level of maintenance to upkeep the residential units, it is not cost effective to buy additional house.
- The agency is strategically pulling in their operational overhead to try to build up cash reserves to be able to respond to future needs.
- They are not looking to add to their portfolio. Because of that they are not able to serve everyone that needs services.
- Unable to serve the persons with the more intensive needs.
- Deinstitutionalization of system beds complicates the ability to serve these at-risk clients because there are not enough units available.
- Need deep subsidies to keep units affordable and livable.

- **Camp Attaway** – a three-week summer day program for children with emotional and behavioral disorders in Howard County.
- 23 years serving children with severe needs - Staff to child ration: 1 to 2.
- There is a need for year-round supports for the families being served by the program.
- Families need additional supports to help with the stress on the family.
- More families with this need than they are able to serve.
- There is no year-round facility.
- Dedicated space is needed for the program.
- Not enough staff.
- No daycare for these special need children.
- Parent training is needed to help them to manage the child's behavior.
- Scholarships for low-income residents needed.
- Special Care Educator is needed – many children tend to be exposed to behavioral issues. The child could be pulled out of the group setting with the additional staff.
- **Autism Specific** –
- Need supports for families.
- High PTSD among families – Respite Care needed.
- **Making Change** – provide 1st time homebuyer education and debt reduction training for potential MIHU homeowners
- Beginning to plan program to do financial management classes for residents in Rapid Rehousing in Howard County's CoC.
- **Needs being seen through the current Financial Coach**
    - Low-to moderate income clients being referred to DSS and CAC because of trouble with maintaining rental cost
    - Many clients they see have a 75% housing cost burden
    - Increase senior residents with same high cost burden and extreme card debt. Many of them living on limited income such as SSI or SSDI.
    - Households they serve have extreme credit debt because there are forced to use the credit card for regular living expenses.
    - Single female headed households working multiple jobs or in school primary clients being seen.
    - Rent increase impact the household stability.
    - Income not keeping pace with the increasing cost of rental housing.
    - Increase this past year with senior experiencing housing crisis due to illness related costs on the household. Look for help managing debt payment and budget.
    - Financial Coach does a "soft handover" to other agencies in the Nonprofit Collaborative where they are located that can help with other needs of the households.
    - Whole lot of referrals needed with these clients as well as the high amount of follow up required for these households.
- **Howard County Department of Social Services (DSS)** – Emergency financial and housing assistance for persons in crisis, child protective services, food stamps, income maintenance, medical assistance, adoption and foster care.
- Social Worker only provided around the child protective services.
- Children aging out of Foster Care – no group homes in Howard County
- Group homes are in other counties which is where they receive their services.

- Those that want to come back to Howard County (because it is their home) the high cost of housing in the county put additional stresses on the person.
  - **Needs being seen**
  - Precarious housing situations
  - $400 water bill need help with
  - Broken down car
  - Large financial crisis in family
- Support Services would only focus around the Family Protective Order. They refer to other agencies for other needs in the household
- **Rebuilding Together** – been serving Howard County households for 26 years. Renovations and improvements to help improve the safety and livability of the homes allowing the homeowners to remain in their homes.
- 80 homes completed last year.
- Help with homeowners in Ellicott City impact by the 2 floods (2016 & 2018).
- Partnership with local nonprofits (Bridges to Housing Stability and Humanim) providing renovations to group homes to keep them safe and livable.
- Through CDBG funding, able to do significant repairs to the home.
- Expensive repairs
  - **Needs being seen**
  - Urgent repair funding is needed. Not able to do urgent needs with CDBG due to the environmental timing required.
  - Increased need for home modifications, accessibility and aging-in-place upgrades.
  - Seeing an increase demand for CDBG funded renovation and upgrades by income eligible homeowners. More than funding allows
- Handy Man Services created – group of 15 volunteers that go into homes that only need minor repairs.
- **Bridges to Housing Stability** – been serving Howard County homeless and low-income families for 28 years.
- Housing Solutions - provides transitional housing, rapid rehousing, housing connections services.
- Some clients they work with have a criminal background which makes it difficult when working with landlords.
- Some families need help with eviction prevention to avoid the household falling into homelessness.
- Many households need below market rents to make it on their own.
- Happy about getting the case management residents receive from Bridges.
- Tough to get landlords to reduce rents since Howard County has such a low vacancy rate. The landlord can charge what they want because the market is so competitive.
- Clients with disabilities are difficult to house.
- Fair Housing issues – Family households are being discriminated against.
- Landlords don't like working with short-term subsidies, especially when the low-income household may not be able to afford the rent once the subsidy ends.
- 6-12 month subsidies typical.
- Clients want to stay in Howard County.
- **Needs seen in program**
  - Not enough affordable units available. Need more choices

        - Need studios and single room occupancy (SRO) for extremely low-income seniors and individuals.
        - More innovative housing / Other choices than what is currently used to respond to the demand.
- **Living in Recovery (LIR)** – since 2010 providing sober housing for men and women in Howard County with support services and peer supports in an environment of accountability.
- Need for recovery housing not being met prior in Howard County.
- LIR has 3 men's houses and 2 women's houses.
- Many of the clients that struggled with addictions tend to have burned all of bridges in the personal world.
- Real estate too expensive in Howard County.
- Have been able to have paid staff for the couple of years. Started out with all volunteer run.
        - **Needs of the program**
        - Funding for acquisition and staff costs
        - Have seen an increased demand (211 overdoses in Howard County).
        - Most have a drug addition, with no job and no money. Most have been cut off by their families.
        - More calls than they are able to serve.
- LIR is having good outcomes / Must be clean.
- Are getting some referrals from the Howard County Jail.
- Work with the clients to get job / looking for apprentice type jobs which will pay more
- There is a 30-day subsidy available. Only 25% of clients use it.
- 12-Step Program used in recovery treatment.
- Develop employment in stages – building job skills.
- Rental housing is needed.
- **Notes on Homeless CoC**
- Challenge with filling permanent supportive housing (PSH) units quickly
- Challenges in keeping in contact with homeless on list.
- Outreach is limited.
- Need a fully functioning Outreach Team.
- In past 10 months, homeless with significant barriers / higher vulnerability index presenting.
- Not enough staff to work with homeless / more than just not having a unit
- More housing subsidies needed / more vouchers to serve the need.

FFY2019 ANNUAL ACTION PLAN TIMELINE

FFY19 ACTION PLAN TIMELINE

Updated October 4, 2018

DATE	ACTION ITEM
NOVEMBER 2018	
Thursday, November 8, 2018	Email Public Notice/Notice of Public Hearing # 1 to Newspapers
Monday, November 12, 2018	Email Compliance Officer Public Notice for Hearing # 1 Posting to Web-page
November 15, 2018	*Publish and Post to Web-page* **Public Notice/Notice of Public Needs Hearing #1**
DECEMBER 2018	
Thursday, December 6, 2018	**Public Hearing / Public Needs Hearing #1**
Thursday, December 13, 2018	Email Public Notice/Notice of Public Hearing # 2 to Newspapers
Monday, December 17, 2018	Email Compliance Officer Public Notice for Hearing # 2 Posting to Web-page
December 20, 2018	*Publish and Post to Web-page* **Public Notice/Notice of Public Needs Hearing #2 (Public Meeting)**
JANUARY 2019	
Monday, January 7, 2019	Email Compliance Officer CDBG & HOME Program Applications for Web-page
Thursday, January 10, 2019	**Public Needs Hearing #2 (Public Meeting)** *Distribute RFP's and Post RFP to Web-Page*
FEBRUARY 2019	
Monday, February 4, 2019	**RFP Submission Deadline (3:30 pm)**
Thursday, February 14, 2018	Email Public Notice/Notice of Public Hearing # 3 to Newspapers
Monday, February 18, 2019	Email Compliance Officer Public Notice for Hearing # 3 Posting to Web-page
Thursday, February 21, 2019	*Publish and Post to Web-Page* **Public Notice/Notice of Public Meeting For Public Comment Period Meeting on March15, 2018**
Friday, February 22, 2019	***Draft Action Plan Complete***
Monday, February 25, 2019	**30-Day Public Comment Period - *Begins***
MARCH, 2019	
Wednesday, March 13, 2019	**30-Day Comment Public Meeting #3**
Friday, March 15, 2019	**Draft copy of AAP and Written Testimony from Director Cimino to Jen Sager**
Thursday, March 21, 2019	**Pre-File Date – Resolution and FFY19 AAP is submitted to Council**
Thursday, March 21, 2019	Email Public Notice/Notice of Public Hearings # 4 & # 5 to Newspapers
Tuesday, March 26, 2019	**30-Day Public Comment Period – *Ends at***

	11:59.99 PM
Monday, March 26, 2019	Email Compliance Officer Public Notice for Hearings # 4 & # 5 for Posting to Web-page
March 28, 2019	*Publish and Post to Web-Page* **Public Notice/Notice of Public Hearings Council & Housing Board Hearings #4 & #5**
APRIL 2019	
April 1, 2019	**Draft Resolution is Introduced to Council**
April 11, 2019	**Public Hearing #4 for County Resolution Process (Housing Board Meeting)**
April 22, 2019	**Public Hearing at County Council / Public Hearing #5 for County Resolution Process (Director Cimino to Testify)**
MAY. 2019	
May 6, 2019	**County Council Vote**
May 10, 2019	Final Edits Complete / Submit to HUD
May 17, 2019	**Final Action Plan due to HUD**

FFY2019 NEEDS ASSESSMENT SURVEY

Department of Housing and Community Development FFY2019 Needs Assessment Survey

1. I am a...

- [ ] Non-profit Housing Provider
- [ ] Housing Advocate
- [ ] Housing Developer
- [ ] Government Employee
- [ ] Other (please specify)
- [ ] Health Service Provider (Mental/Physical/Behavioral)
- [ ] Non-Profit (Non-housing Service Provider)
- [ ] Housing Rehabilitation Provider

2. Does your organization provide any of the following services or programs? Check all that apply.

- [ ] Social/Human Services
- [ ] Affordable Housing Units
- [ ] Community Development Services
- [ ] Economic Development Services
- [ ] Job Training/Placement
- [ ] Other (please specify)
- [ ] Vocational Training
- [ ] Consultation for mental health consumers along with other service needs
- [ ] Housing Rehabilitation
- [ ] Emergency Shelter/Rehousing Assistance

3. Does your organization primarily serve Howard County residents? This survey is for organizations that work primarily with Howard County residents. Thank you.

- [ ] No
- [ ] Yes

0 of 27 answered

4. Does your organization currently receive any of the following funds?
Check all that apply.

- ESG
- CDC Funds
- EFSP and FEMA
- DHR
- CDBG
- HOME Program Funds
- Other (please specify)

5. What population/s does your organization serve? Check all that apply.

- Families
- Senior Citizens
- Persons Experiencing Homelessness
- Single Adults
- Persons with a Physical Disability
- Veterans
- Persons with Mental Illness
- Youth

6. What are the income ranges of the population your organization serves?
Check all that apply.
*Area median income is that of the Baltimore Towson Columbia MSA as provided by the Department of Housing and Urban Development (HUD)

- 0-30 percent area median income
- 31-60 percent area median income
- 61-80 percent area median income
- Over 81 percent area median income

7. The age ranges of the persons that are most assisted by your organization are?
Check all that apply.

- Birth to 10 years old
- 36-55 years old
- 11-18 years old
- Over 55 years old

0 of 27 answered

8. What is the education level of the persons that you provide housing and/or services? Check all that apply.

- Post Graduate
- College Graduate
- Some college
- High School
- Some High School
- Grade School

9. What are the household sizes of persons assisted by your organization? Check all that apply.

- 1
- 2
- 3
- 4
- 5-10
- More than 10

10. What is the source of income for the population that you serve? Please check all that apply.

- Interest or Dividend (investments)
- Public Assistance
- Retirement
- Other (please specify)
- Self-Employment
- Social Security
- Wage or Salary

11. What do you think is needed to support affordable housing. Check all that apply.

- Accept donated houses/land/structures for reuse as affordable housing
- Build new housing
- Create a small house community
- Invest in container homes
- Operate rental housing

0 of 27 answered

- [ ] Connect people willing to rent or sell to people meeting income restrictions and/or seasonal needs
- [ ] Convert accessory units on existing residential units to affordable units
- [ ] Other (please specify)

12. Of the households that you serve, what size of the unit is most requested by your clientele?

- [ ] More than three-bedroom units
- [ ] Single room/efficiency units
- [ ] Three-bedroom units
- [ ] Two-bedroom units
- [ ] Other (please specify)

13. Based on your clientele, what populations most need affordable housing? Check all that apply.

- [ ] Ex-offenders
- [ ] Families with children
- [ ] Persons experiencing homelessness
- [ ] Persons with Autism
- [ ] Other (please specify)
- [ ] Persons with Mental Disabilities
- [ ] Persons with Physical Disabilities
- [ ] Seniors
- [ ] Youths aging out of foster care

14. Other than the cost, what are some of the other reasons the current housing is not adequate for your clientele?

0 of 27 answered

- [ ] Need to live closer to family or relatives
- [ ] Units are too large
- [ ] Units are too small
- [ ] Other (please specify)
- [ ] Units not suitable for independent living
- [ ] Units unsuitable for physical needs

* 15. With the new administration taking office recently, what existing policy would you amend or introduce that could positively impact ***affordable housing*** in Howard County?

16. Based on the population/s that you serve, what are some of the services that are lacking? Check all that apply.

- [ ] Accessibility upgrades
- [ ] Affordable healthcare
- [ ] Case Management
- [ ] Crisis Intervention/Prevention
- [ ] Financial management and resources
- [ ] Other (please specify)
- [ ] Food Assistance
- [ ] Homeowner rehab
- [ ] Housing Location
- [ ] Job Training/Placement

17. Of the persons/households that you work with, what challenges are they faced with when trying to own affordable housing? Check all that apply.

- [ ] Closing costs too high
- [ ] Credit scores/Too much debt
- [ ] Housing prices
- [ ] Insufficient housing stock
- [ ] Interest rates
- [ ] Lack downpayment

0 of 27 answered

18. In your opinion, does discrimination play a role in obtaining affordable rental housing for the clientele you serve?

- Yes
- No

19. Does discrimination play a role in achieving affordable units for purchase?

- Yes
- No

20. If you answered yes, how so?

21. In your opinion, what factors MOST affect fair housing choice in Howard County? Check all that apply.

- Age
- Disability
- Family Size
- Receipt of public assistance
- National origin
- Marital status
- Sex
- Sexual orientation
- Prior conviction
- Race
- Religion

0 of 27 answered

- [ ] No
- [ ] Yes

23. If you answered yes to the question above, how can local employers contribute positively to affordable housing?

24. Would rent control policies assist in preserving affordability?

- [ ] Yes
- [ ] No

25. For all units that are currently affordable, how best do you think the County should preserve them?

26. How could providers best prevent eviction so as to avoid homelessness in the future? Check all that apply.

- [ ] Additional financial education
- [ ] Expand upon partnerships
- [ ] Lessen program guidelines for assistance
- [ ] Other (please specify)
- [ ] Lessening of court fees
- [ ] Rental subsidies

0 of 27 answered

27. Additional Comments- Please provide any additional feedback on affordable housing and community development related issues that may not have been addressed in the survey questions above. Thank you.

DONE

Powered by SurveyMonkey
See how easy it is to create a survey.

Privacy & Cookie Policy

0 of 27 answered

FFY2019 AAP NEEDS HEARING # 1

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Wednesday, November 07, 2018 3:54 PM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi; Deik, Tracy; Wall, Thomas F
Subject:	Public Notice onto Webpage
Attachments:	FFY2019 ActionPlan Public Needs Hearing 1_Public Notice_Notice of Public Hearing.kc edits.doc

Hi Quanita;

Can you please post onto the Grant Division's webpage by November 15, 2018, the attached Public Notice/Notice of Public Hearing? The narrative for page is below having it link from the "Please see notice for the details."

PUBLIC NOTICE/NOTICE OF PUBLIC HEARING

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to attend a Public Hearing (Public Needs Hearing #1) regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2019 Annual Action Plan. Please see notice for the details.

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

1

Meadows, Elizabeth

From: Crouch, Jaymee <jacrouch@tribpub.com>
Sent: Thursday, November 08, 2018 9:22 AM
To: Meadows, Elizabeth
Cc: Animashaun, Nkechi; Deik, Tracy; Wall, Thomas F
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

This notice has been submitted.

Have a great day!

Jaymee Crouch
Baltimore Sun, 410-539-7700 · *Chicago Tribune*, 312-222-2222 · *Daily Press*, 757 247-4700
Hartford Courant, 860-525-2525 · *Los Angeles Times*, 800-234-4444 · *San Diego Union Tribune*, 619-293-1423

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Communication may be reviewed for quality & training purposes.
Great Customer Service is our top priority.
Share your feedback at excellence@tribpub.com

From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Thursday, November 08, 2018 8:20 AM
To: Crouch, Jaymee
Cc: Animashaun, Nkechi; Deik, Tracy; Wall, Thomas F
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

This looks great. Thanks for the change. You can print this on Thursday, 9/15/18.

Thanks again, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

From: Crouch, Jaymee [mailto:jacrouch@tribpub.com]
Sent: Thursday, November 08, 2018 9:17 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

1

An updated proof is attached for you to review and approve.

Order #: 5980119

Newspaper: Howard County Times & Columbia Flier

Run Date(s): Thursday, November 15, 2018

Total Cost: $324.81

Billed Account: CU00168892 Howard County Dept of Housing

Please let me know when you are ready to submit your notice by **Deadline:** Tuesday November 13th at 2 PM

Your Proof of Publication will be sent out in 7-10 business days after your ad is finished running.

Let me know if you have any questions.

Have a great day!

Jaymee Crouch
Baltimore Sun, 410-539-7700 · *Chicago Tribune*, 312-222-2222 · *Daily Press*, 757-247-4700
Hartford Courant, 860-525-2525 · *Los Angeles Times*, 800-234-4444 · *San Diego Union-Tribune*, 619-293-1423

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From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Thursday, November 08, 2018 7:27 AM
To: Crouch, Jaymee
Cc: Animashaun, Nkechi; Delk, Tracy; Wall, Thomas F
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Good Morning:

I have one adjustment to the Notice if it possible? In the title, our "Com" in our department name down to second line so "Community" is not broken up on two lines? Is that possible?

Thanks, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT

9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

*Please note our new office address as of July 17, 2018.

From: Crouch, Jaymee [mailto:jacrouch@tribpub.com]
Sent: Wednesday, November 07, 2018 5:46 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>; Wall, Thomas F <tfwall@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Good afternoon,

A proof is attached for you to review and approve.

Order #: 5980119

Newspaper: Howard County Times & Columbia Flier

Run Date(s): Thursday, November 15, 2018

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Baltimore Sun, 410-539-7700 · *Chicago Tribune*, 312-222-2222 · *Daily Press*, 757-247-4700
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Communication may be reviewed for quality & training purposes.
Great Customer Service is our top priority.
Share your feedback at excellence@tribpub.com

From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Wednesday, November 07, 2018 3:35 PM
To: Harris, Ellen; Welenc, Charlie; cnglegal@tcpnc.com

Cc: Animashaun, Nkechi; Deik, Tracy; Wall, Thomas F
Subject: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Good Afternoon;

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **November 15, 2018** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

THE BALTIMORE SUN MEDIA GROUP

Order ID: 5980119

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* Agency Cor

GROSS PRICE * : **$324.81**

PACKAGE NAME: CNG Howard County Times Single

THE BALTIMORE SUN MEDIA GROUP

Order ID: 5980119

Printed: 1

* Agency Cor

GROSS PRICE * : **$324.81**

PACKAGE NAME: CNG Howard County Times Single

Product(s): Howard County Times, classified.CNG.com, classified.MDDC.com_CNG, Columbia Flier

AdSize(s): 2 Column (8TAB)

Run Date(s): Thursday, November 15, 2018

Color Spec. B/W

Preview

PUBLIC NOTICE/NOTICE OF PUBLIC HEARING

Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

November 15, 2018

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non profit organizations to attend a Public Hearing (Public Needs Hearing #1) regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2019 Annual Action Plan.

The Annual Action Plan, which supports the FFY16 Approved Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,257,864.00 in CDBG funds and $491,376.00 in HOME funds for the FFY2019 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, [illegible]

THE BALTIMORE SUN MEDIA GROUP

Order ID: 5980119

Printed. 1

* Agency Cor

GROSS PRICE * : **$324.81**

PACKAGE NAME: CNG Howard County Times Single

normic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are encouraged to attend this Public Needs Hearing which will explain any changes to the FFY19 Applications for both CDBG and HOME funding.

The Public Needs Hearing will be held on Thursday, December 6, 2018 at 1:30 PM, at the Howard County Community Resource Campus at 9820 Patuxent Woods Drive, Training Room 211, Columbia MD 21046.

If you cannot attend the Public Hearing or would like additional information regarding the development of the FFY2019 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Department of Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at (410) 313-6318, three (3) business days prior to the hearing. Efforts will be made to accommodate the disabled and non-English speaking citizens with three (3) days advance notice to Quanita Kareem, Compliance Officer, at 410-313-3386.

HCT/CF 11/15/2018 5980119

Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Thursday, November 08, 2018 8:17 AM
To: 'Welenc, Charlie'; Harris, Ellen
Cc: Animashaun, Nkechi; Deik, Tracy; Wall, Thomas F
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Hi Charlie;

Thanks very much for your help with this.

Regards, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

From: Welenc, Charlie [mailto:cwelenc@Tribpub.com]
Sent: Wednesday, November 07, 2018 5:12 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>; Harris, Ellen <ceharris@baltsun.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Hi Elizabeth,

This has been received. It will be assigned to one of our reps who will put the notice together and email you a proof for approval.

Best,

Charlie Welenc
Team Lead, Inbound Sales
160 N Stetson Ave, Chicago, IL 60601
312-981-7298 | Direct
cwelenc@tronc.com

TRIBUNE PUBLISHING
the results group

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Wednesday, November 7, 2018 3:35 PM
To: Harris, Ellen <ceharris@baltsun.com>; Welenc, Charlie <cwelenc@Tribpub.com>; cnglegal@tronc.com

Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>
Subject: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Good Afternoon;

Customer # CU00168892

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The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

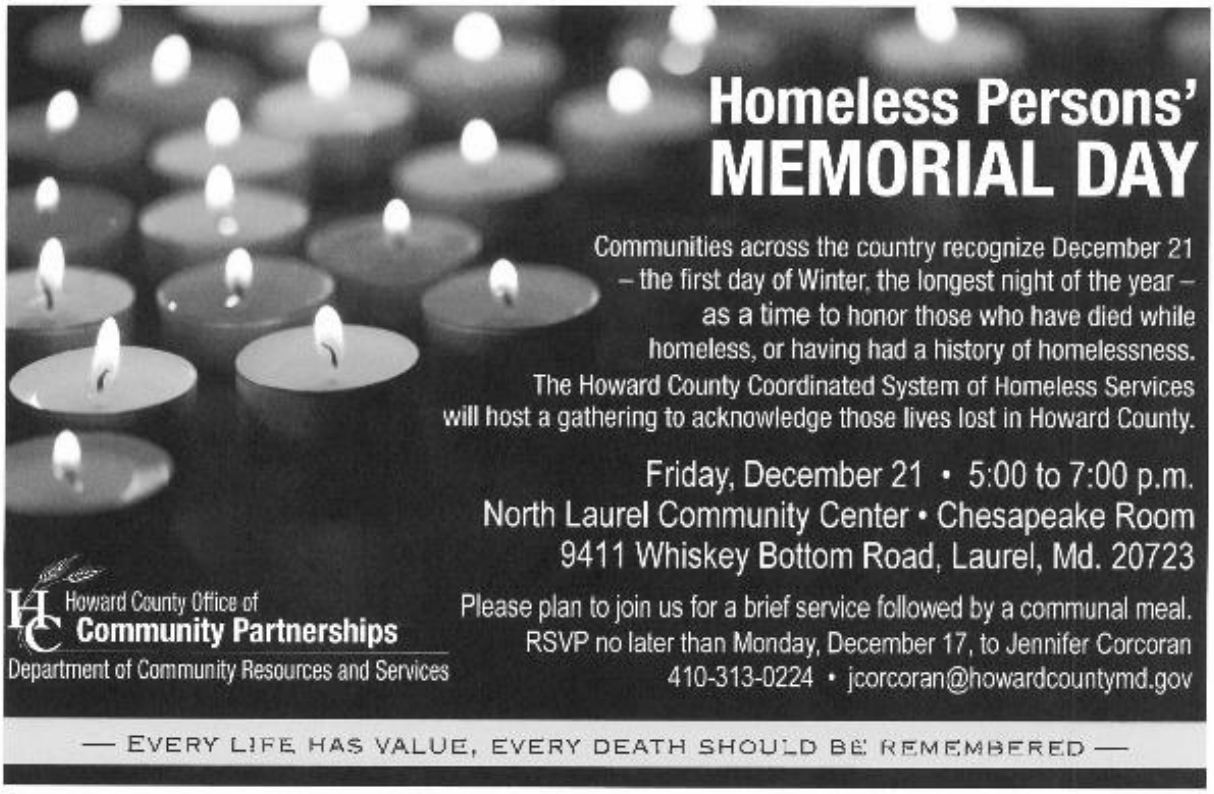
***Please note our new office address as of July 17, 2018.**

2

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ■ Columbia, Maryland 21046 ■ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410 313 5960

FFY2019 Public Need Hearing
Action Plan Public Hearing #1
Thursday, December 6, 2018 1:30PM
The Howard County Community Resource Campus – Training Room 211
9820 Patuxent Woods Drive, Columbia, MD 21046

- **Greetings** – Kelly Cimino, Director
- **Introduction of Staff**
  - Elizabeth Meadows, Chief, Community Planning and Grants
  - Nkechi Animashaun, Home Program Coordinator
- **Needs Hearing Overview**
  - Reason for Needs Hearing
  - Needs Strategies outlined in 2016 Approved Consolidated Plan (handout w/Agenda)
  - FFY2019 Annual Action Plan Process
    - Key Dates / Public Time-line (handout w/Agenda)
    - Next Meeting – January 10, 2019 Public Hearing #2 & RFP delivered
- **Group Discussion**
  - Roundtable Discussion from Attendees
  - Notetaking by Staff
- **Needs Hearing Survey Overview and Availability**
  - Survey Discussion / Importance / Hand-out – Nkechi Animashaun
  - Surveys will be emailed to everyone
  - Survey also posted on Housing Web Page until February 4, 2019
  - If Questions, contact Elizabeth Meadows – emeadows@howardcountymd.gov
- **Closing Remarks**
  - Would like to see everyone at the January 10, 2019 meeting which is Public Hearing # 2 **and the announcement for the FFY2019 Request for Proposals (RFP)**


Homeless Persons'
MEMORIAL DAY
Communities across the country recognize December 21 – the first day of Winter, the longest night of the year – as a time to honor those who have died while homeless, or having had a history of homelessness. The Howard County Coordinated System of Homeless Services will host a gathering to acknowledge those lives lost in Howard County.
Friday, December 21 • 5:00 to 7:00 p.m.
North Laurel Community Center • Chesapeake Room
9411 Whiskey Bottom Road, Laurel, Md. 20723
Please plan to join us for a brief service followed by a communal meal.
RSVP no later than Monday, December 17, to Jennifer Corcoran
410-313-0224 • jcorcoran@howardcountymd.gov
Howard County Office of
Community Partnerships
Department of Community Resources and Services
— EVERY LIFE HAS VALUE, EVERY DEATH SHOULD BE REMEMBERED —

PUBLIC NOTICE/NOTICE OF PUBLIC MEETING

Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

December 20, 2018

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to attend a Public Meeting regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2019 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1257,864.00 in CDBG funds and $491,376.00 in HOME funds for the FFY2019 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low to moderate-income residents. Activities may include but are not limited to housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are required to attend this public meeting which will include a brief pre-submission application review.

The Public Needs Hearing will be held on **Thursday, January 10, 2019 at 1:30 PM**, at the Howard County Community Resource Campus, 9820 Patuxent Woods Drive, Training Room 211, Columbia MD 21046.

Applications for funding will be available immediately following the meeting. The application will also be available at the Howard County Housing administrative office at the address noted below and on the County's web page at www.howardcountymd.gov. **The Application submission deadline is Monday, February 04, 2019 at 3:30 pm.**

If you cannot attend the meeting or would like additional information regarding the development of the FFY2019 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at (410) 313-6318, three working days prior to the hearing. Efforts will be made to accommodate the disabled and non-English speaking citizens with three (3) days advance notice to Quanita Kareem, Compliance Officer, at 410-313-3386.

OMB Control No: 2506-0117 (exp. 06/30/2018)

C NEEDS HEARING / PUBLIC MEETING NUMBER 2 - FEDERAL FISCAL YEAR 2019 (FFY2019)
N SHEET
ay, January 10, 2019

AME	LAST NAME	ORGANIZATION/ AGENCY	TELEPHONE NO.	EMAIL ADDRESS
CINDY	PARR	Arc Howard	410-730-0635	cparr@archoward.org
Renee	McElroy	Making change	443-518-7650	Mcelroyr@makingchange.center.org
Tom Hwang	Hwang	CIAN USA	443-936-8616	tomhwang@gmail.com
Tim Siems	Siemens	Grace Church	240-553-1045	tim.siemens@gracehc.org
Kim	Page	Bridges to Housing Stability	443 518-7661	kim@bridgestohc.org
Anna	Katz	Grassroots	410 531-6006	anna@grassrootsinc.org
Brian	Taylor	Arc Howard	410-730-0638	btaylor@archoward.org
Liz	Burrage	The Arc HC	410-730-0638	eburrage@archoward.org
Debbie	Daskaloff	Living in Recovery	410-615-9426	ddaskaloff@aol.com
Linda	Zumbrun	HoCoDSS	410-872-8267	
Mary	Campbell	HoCo. CHR	410 313 6464	MARY.CAMPBELL@howardcountymd.gov
Sue Ann	Shafley	Camp Attaway	443 518 7671	Shafley.camp attaway@gmail.com
Jud.	Olinger	iHomes	443-834-8225	jolinger@ihomes.org
Michael	Lee	Making Change	443-518-7647	Mlee@making change.center.org

Meadows, Elizabeth

From: Nkechi M. Animashaun <invite@eventbrite.com>
Sent: Thursday, November 29, 2018 2:00 PM
To: Meadows, Elizabeth
Subject: You're invited to FFY2019 Needs Hearing #1 (Dec 6, 2018)

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hello Elizabeth,

You are invited to the following event:

FFY2019 NEEDS HEARING #1

Event to be held at the following time, date, and location:

Thursday, December 6, 2018 from 1:00 PM to 3:00 PM (EST)

9820 Patuxent Woods Dr, Suite 224
9820 Patuxent Woods Drive
Room 211
Columbia, MD 21046

View Map

Attend Event

Event registration is by invitation only. Register with your email address to attend this event.

Howard County is in the process of preparing its FFY 2019 Annual Action Plan(AAP). The County will host two (2) public hearings to inform the preparation of this plan by identifying the needs in the County based on input from advocates and service providers. The County needs to prepare the AAP in order to access Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Program Federal Funds, which the County uses to serve the low- and

1

moderate income population of Howard County. The first public meeting will be scheduled for ***December 06, 2018 from 1:00 pm to 3:00 pm***. Your input is vital, so we strongly encourage you to attend and provide feedback on housing related needs in the community.

In addition to CDBG and HOME Program funds, the County will also be accepting applications for Moderate Income Housing Units (MIHU) program funds. At the second Needs Hearing, more details regarding the use and amount of MIHU program funds will be provided. The Housing Department's staff will also release of the FFY 2019/FY2020 Request for Proposals (RFP) at that time.

Please feel free to share this invitation with other local non-profit service providers that work on affordable housing development and human services for at-risk populations in the County.

Thank you for your assistance. Should you have any questions, you may reach me at 410-313-6324 or via email at smeadows@howardcountymd.gov.

We hope you can make it!Cheers,Nkechi M. Animashaun

This invitation was sent to smeadows@howardcountymd.gov by the organizer of this event. Nkechi M. Animashaun.
To stop receiving invitations from this organizer, you can unsubscribe.

Eventbrite, Inc. | 155 5th St., 7th Floor | San Francisco, CA 94103

RECEIVED
DEC 17 2018
By

THE BALTIMORE SUN MEDIA GROUP
300 E. Cromwell Street
Baltimore, Maryland 21230
tel: 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 5980119

Sold To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

Was published in "Columbia Flier", "Weekly", a newspaper printed and published in Howard County on the following dates:

Nov 15, 2018

The Baltimore Sun Media Group

By _____

Legal Advertising

PUBLIC NOTICE/NOTICE OF PUBLIC HEARING

Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 204
Columbia, MD 21046

November 15, 2018

The Howard County Department of Housing and Community Development (HCDD) is the County's primary agency for administering the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. The Annual Action Plan, which supports the FY19 Adopted Consolidated Plan, is the County's yearly application to HUD for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,425,284.00 in CDBG funds and $491,950.00 in HOME funds for the FY2019 Program year.

The CDBG and Home programs provide funds for activities that benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, new construction, public facility activities or public service opportunities. Organizations that desire to apply for funding are encouraged to attend this Public Needs Hearing which will explain the process to apply for the new FY19 Applications for both CDBG and HOME funding.

This Public Needs Hearing will be held on Thursday, December 6, 2018 at 1:30 PM at the Howard County Community Resource Campus at 9820 Patuxent Woods Drive, Meeting Room 211, Columbia MD 21046.

If you cannot attend the Public Hearing or would like additional information regarding the development of the FY2019 Annual Action Plan, please contact Elizabeth Mcallister-Gile, Community Development and Grants at 410-313-6321, or email emcallister-gile@howardcountymd.gov or the Howard County Department of Housing at the 9820 Patuxent Woods Drive, Suite 204, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at (410) 313-6316, three (3) business days prior to the meeting. Broadcast Relay Service or other similar services may be used to contact persons with hearing or speech disabilities. Persons who require special accommodations should contact the Department of Housing at (410) 313-6316, Voice or 410-313-6314, TDD.

HCDD 11/15/2018

5980119

RECEIVED
DEC 17 2018
By

THE BALTIMORE SUN MEDIA GROUP
300 E. Cromwell Street
Baltimore, Maryland 21230
tel: 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 5980119

Sold To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

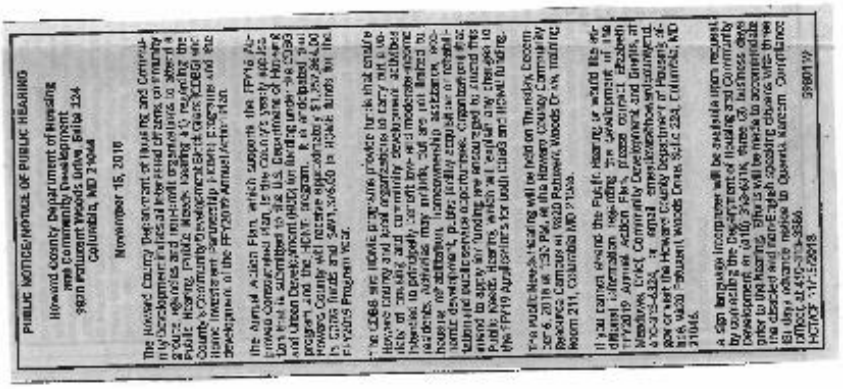
Was published in "Howard County Times", "Weekly", a newspaper printed and published in Howard County on the following dates:

Nov 15, 2018

The Baltimore Sun Media Group

By S. Whitelaw

Legal Advertising



PUBLIC NOTICE/AVISO DE PUBLIC HEARING

Howard county Department of Housing
and Community Development
3430 Rutland Woods Drive, Suite 224
Columbia, MD 21044

November 15, 2018

The Howard County Department of Housing and Community Development (DHCD) is initiating the process to amend its FY2019 Annual Action Plan. The Annual Action Plan, which supports the FFYs Administration of the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) programs, is the annual implementation component of the Consolidated Plan. The Consolidated Plan is a five-year planning document that identifies housing and community development needs and priorities and establishes strategies to address those needs. The Annual Action Plan describes the activities to be undertaken during the upcoming program year to address priority needs identified in the Consolidated Plan.

The Annual Action Plan, which supports the FFYs Administration of the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) programs, is the annual implementation component of the Consolidated Plan. The Consolidated Plan is a five-year planning document that identifies housing and community development needs and priorities and establishes strategies to address those needs. The Annual Action Plan describes the activities to be undertaken during the upcoming program year to address priority needs identified in the Consolidated Plan. Howard County will receive approximately $1,357,864.00 in CDBG funds and $471,306.00 in HOME funds for the FY2019 Program year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out activities for affordable housing and community development activities that benefit low- and moderate-income persons. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, workforce development, public facilities and improvements, public services, and planning and administration. Funding are encouraged to submit their proposals for consideration. Applications will be available on November 15, 2018 and will be due on January 7, 2019 at 4:30 PM. Applications for both CDBG and HOME funding for the FFY19 applications for both CDBG and HOME funding.

The public hearing will be held on Thursday, December 6, 2018 at 7:30 PM, at the Howard County Community Resource Campus at 9830 Patuxent Woods Drive, main room Room 211, Columbia MD 21046.

If you cannot attend the Public Hearing or would like additional information regarding the development of the FY2019 Annual Action Plan, please contact Elizabeth Nemphos, Chief, Community Development and Grants, at 410-313-6324, or email emnemphos@howardcountymd.gov or visit the Howard County Department of Housing at 3430 Rutland Woods Drive, Suite 224, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development on (410) 313-6317, three (3) business days prior to the hearing. Efforts will be made to accommodate other special needs. English speaking citizens who need a translator to participate in the hearing should contact Queena Kamau, Coordinator, at 410-313-6317 or 410-313-6566.

HOWARD 11/15/2018 5980119

Meadows, Elizabeth

From: Animashaun, Nkechi
Sent: Friday, December 07, 2018 4:53 PM
To: Delk, Tracy
Cc: Meadows, Elizabeth
Subject: Website Post Survey

Hi Tracy,

Can you please post this to our webpage, on the grants page?
Here you go.

FFY2019 Annual Action Plan Needs Survey

Howard County is in the process of preparing its FFY 2019 Annual Action Plan(AAP). To help inform the preparation of this plan, the County requests input from advocates and service providers. The County needs to prepare the AAP in order to access Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Program Federal Funds, which the County uses to serve the low- and moderate income population of Howard County. Your input is vital, so we strongly encourage you to not only complete the survey, but please share with any other service providers that work to create affordable housing and/or human service assistance programs.

Click here to complete the survey. Thank you.

The word is already hyperlinked, but here is the link in case it doesn't transfer to the website.

https://www.surveymonkey.com/r/FFY2019Needsassessment

Thank you so much for your assistance in updating and creating this year's survey.

Warmest Regards,

Nkechi M. Animashaun, HOME Program Specialist
Community Planning & Grants Management
HOWARD COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224*
Columbia, MD 21046
Direct Dial: 410-313-3693
Fax No.: 410-313-5960
nanimashaun@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

1

Meadows, Elizabeth

From: Animashaun, Nkechi
Sent: Friday, December 07, 2018 5:09 PM
Cc: Meadows, Elizabeth
Subject: Thank you & Survey

Good afternoon,

On behalf of the staff at the Department of Housing and Community Development, I would like to say a huge thank you for attending the first FFY2019 Needs Hearing. We hope you've enjoyed it as much as we did in discussing the current needs within the community that we all serve.

As promised, I wanted to send out the Needs Assessment survey today. Please share with other service providers so that we can use the data in informing the Annual Action Plan. As Elizabeth mentioned, your participation is not in vain and because of your voice, we were able to fund two new projects in the current program year that hadn't been funded previously. Your participation in the Needs Hearing is not only appreciated, but it is necessary to help to expand affordable housing and community development activities in Howard County, while advocating for some of the most vulnerable individuals.

Thank you so much for all that you do!

We thank you for your assistance in this process and look forward to working with all of you in creating, maintaining and supporting affordable housing activities in Howard County.

Please click here to complete the survey.

Warmest Regards,

Nkechi M. Animashaun, HOME Program Specialist
Community Planning & Grants Management
HOWARD COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224*
Columbia, MD 21046
Direct Dial: 410-313-3693
Fax No.: 410-313-5960
nanimashaun@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

Howard County, Maryland > Dep
https://www.howardcountymd.gov/Departments/Housing-and-Community-Development/Community-Planning-a...
Housing Spotlight
About Us
Dept News
Dept Meetings and Events
Contact Us
Navigation
Housing And Community Development
DHCD Programs
Community Planning And Grants Management
MIHU Rental Opportunities
For Developers
Housing Commission
Boards
Publications
FAQs
Quick Links
FFY2019 Annual Action Plan Needs Survey
Howard County is in the process of preparing its FFY 2019 Annual Action Plan(AAP). To help inform the preparation of this plan, the County requests input from advocates and service providers. The County needs to prepare the AAP in order to access Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Program Federal funds, which the County uses to serve the low- and moderate income population of Howard County. Your input is vital, so we strongly encourage you to not only complete the survey, but please share with any other service providers that work on create affordable housing and/or human service assistance programs.
Click here to complete the survey. Thank you.
Public Notice/ Notice of Public Hearing
8:37 AM
12/10/2018

FFY2019 AAP PUBLIC HEARING # 2

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

FFY2019 Public Need Hearing
Action Plan Public Meeting
Public Needs Hearing #2
Thursday, January 10, 2019 (1:30 PM)
The Howard County Community Resource Campus – Training Room 211
9820 Patuxent Woods Drive, Columbia, MD 21046

Greetings and Introduction of Staff

- Elizabeth Meadows, Chief, Community Planning and Grants
- Nkechi Animashaun, Home Program Coordinator
- Michelle Hippert, CoC Manager / DCRS

- **Fair Housing Overview** – Mary Campbell, Senior Investigator and Compliance Officer, Howard County Office of Human Rights

- **Upcoming Training: Affirmative Marketing Training** – Monday, January 14, 2019 from 12:30pm to 5 pm. *Lunch will be provided*

- **Needs Hearing Requirement (Public Meeting)**
  - Public Comment Opportunity #2
  - CDBG and HOME Power Point Presentation / Survey Discussion / Outcomes
  - Needs Strategies outlined in 2016 Approved Consolidated Plan
  - Question and Answer – Public Feedback

- **RFP Overview**
  - CDBG
  - HOME
  - Fee-in-Lieu

- **FFY2019 Action Plan Process Update**
  - Remaining Key Dates / Public Time-line
  - Next Step (RFP Submission – February 4th 3:30 pm
  - Initial Notifications will be sent by June 15, 2019
  - Public Meeting #3 & Draft Comments Due - March 13, 2019

- **Exit Items**
  - Survey also posted on Housing Web Page until February 4, 2019
  - Like to hear Action Plan Draft Comments
  - If Questions, contact Elizabeth Meadows – emeadows@howardcountymd.gov

PUBLIC NEEDS HEARING / PUBLIC MEETING NUMBER 1 - FEDERAL FISCAL YEAR 2019 (FFY2019)

SIGN IN SHEET

Thursday, December 6, 2018

FIRST NAME	LAST NAME	ORGANIZATION/ AGENCY	TELEPHONE NO.	EMAIL
Delaurayo	Scruggs	Community Action Partnership	410-313-6440	dscruggs@
Emmanuel		Citizen, the Resource	443-870-2718	
Zenda	Zumbrun	HarCo DSS	410-838-8247	
Ann	O'Hanlon	Rebuilding Together	443-812-5827	
Joe	Wilcoxen	Advocate	443 745 0456	
Renee	McElroy	Making Change	4435187650	
Michael	Lee	Public Housing	410-638-2167	
Cindy	Levy	Arc Howard	410-730-0635	
Jen	Broderick	Bridges	410-312-5760 ext 117	
Michelle	Hippert	DCRS/CoC	410-313-5971	
Kit	Burrage	The Arc of HC	410-730-0880	
Cindy	Perry	The Arc of HC	"	
Bridget	Taylor	The Arc of HC	"	
Sue Ann	Shipley	Caring Advocacy	443 543 5761	

OMB Control No: 2506-0117 (exp. 06/30/2018)

For more information about your Fair Housing rights and Housing discrimination, contact:

- Howard County Office of Human Rights
  Phone: (410) 313-6430
  (410) 313-0220 VOICE/RELAY
  https://www.howardcountymd.gov/Departments/County-Administration/Human-Rights

- Maryland Commission on Civil Rights
  Phone: (410) 767-8600
  Toll free: 1-800-637-6247
  VOICE/RELAY
  www.mccr.maryland.gov

- U.S. Department of Housing and Urban Development (HUD) Fair Housing Field Office:
  Baltimore, MD
  Phone: (410) 209-6640
  Fax: (410) 209-6673
  TTY: 1-800-877-8339
  www.hud.gov/offices/fheo/

The Office of Human Rights is a governmental agency that provides Fair Housing education and enforces the Fair Housing Law in Howard County.

Fair Housing Brochures
In Other Languages

Please contact the Office of Human Rights for a brochure in Spanish, Korean, Chinese and Vietnamese.

Allan H. Kittleman, County Executive

Dr. Barbara J. Sands, Administrator

Howard County
Office of Human Rights
9820 Patuxent Woods Drive
Suite 237
Columbia, MD 21046
Phone: 410-313-6430
Fax: 410-313-6468
https://www.howardcountymd.gov/Departmenst/County-Administration/Human-Rights

Printed 8/13/18

Howard County
Office of Human Rights

Fair Housing is Your Right!

Fair Housing in Howard County

OMB Control No: 2506-0117 (exp. 06/30/2018)

Your Fair Housing Rights

When you buy or rent, you have the right to:

- See any house or apartment in any neighborhood or location.
- All information about the price, fees, taxes and other charges related to housing.
- Have a contract presented, application considered, income evaluated, and interest and fees charged the same as other persons.
- Take possession of, move into, and live peacefully in the residence of your choice.
- Make, at your expense, reasonable modifications so that the unit is more accessible, such as installing grab bars in the bathroom.

It Is Unlawful To:

- Refuse to rent to you or sell you housing.
- Tell you housing is unavailable when it is.
- Deny persons with disabilities the right to make reasonable accommodations.
- Advertise housing to preferred groups of people or to exclude protected groups.
- Show you homes or apartments only in certain neighborhoods.
- Refuse financing of housing.
- Refuse to provide you information regarding mortgage loans, deny you a mortgage loan or impose different conditions or terms on a mortgage loan.
- Set different terms, conditions or privileges for the sale or rental of a dwelling.
- Deny you property insurance.
- Harass, coerce, intimidate or interfere with anyone exercising or assisting someone else with his or her fair housing rights.

Your Fair Housing Responsibilities

When you sell or rent to others:

- You must make the unit available to all persons.
- The conditions for sale or rent must be the same for all applicants.
- You should not steer applicants to homes selected because of the racial, religious, or ethnic characteristics of the area.

When You Advertise:

It is discriminatory if you make or your agent causes the making, printing or publishing of any notice, statement or advertisement regarding the sale or rental of a dwelling that indicates a preference or limitation.

For a complete copy of Howard County's Fair Housing Law, go to www.co.ho.md.us and click Howard County Charter and Code. The Housing Law will be under Title 12, Subtitle 2, Section 12.207.

Join us for

An afternoon of Affirmative Marketing Training

When: Monday 14, January 2019

Where: 9820 Patuxent Woods Drive, Suite 224, Room 211

Time: 11:30am to 4:00pm

Cost: Free, free, free

Come early enjoy lunch on us. Training begins promptly at 1:00pm!
If interested, please email nanimashaun@howardcountymd.gov by COB on Friday 11, January 2019.

FAIR HOUSING IS THE LAW!

PUBLIC NOTICE/NOTICE OF PUBLIC MEETING

Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

December 20, 2018

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to attend a Public Meeting regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2019 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1257,864.00 in CDBG funds and $491,376.00 in HOME funds for the FFY2019 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low to moderate-income residents. Activities may include but are not limited to housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are required to attend this public meeting which will include a brief pre-submission application review.

The Public Needs Hearing will be held on **Thursday, January 10, 2019 at 1:30 PM**, at the Howard County Community Resource Campus, 9820 Patuxent Woods Drive, Training Room 211, Columbia MD 21046.

Applications for funding will be available immediately following the meeting. The application will also be available at the Howard County Housing administrative office at the address noted below and on the County's web page at www.howardcountymd.gov. **The Application submission deadline is Monday, February 04, 2019 at 3:30 pm.**

If you cannot attend the meeting or would like additional information regarding the development of the FFY2019 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at (410) 313-6318, three working days prior to the hearing. Efforts will be made to accommodate the disabled and non-English speaking citizens with three (3) days advance notice to Quanita Kareem, Compliance Officer, at 410-313-3386.

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Tuesday, December 11, 2018 2:47 PM
To:	Ellen Harris (ceharris@baltsun.com); Fox, Rodney; Patuxent Legals Email (crglegal@tronc.com)
Cc:	Animashaun, Nkechi; Deik, Tracy; Wal , Thomas F
Subject:	FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing
Attachments:	FFY2019 ActionPlan and RFP Public Notice_.doc

Good Afternoon;

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **December 20, 2018** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

1

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Tuesday, December 18, 2018 9:50 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi; Deik, Tracy
Subject:	Notice of Public Meeting onto Grants Page
Attachments:	FFY2019 ActionPlan and RFP Public Notice_.doc

Hi Quanita;

Can you please make the following changes to the Community Planning and Grants webpage by the close of Thursday?

Please Remove:

Public Notice / Notice of Public Hearing

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to attend a Public Hearing (Public Needs Hearing #1) regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2019 Annual Action Plan.
Please see notice for the details.

Please Replace with the following:

Public Notice / Notice of Public Meeting (January 10, 2019)

The Howard County Department of Housing and Community Development will host a Public Meeting regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs and the development of the FFY2019 Annual Action Plan. This is the second opportunity for the public to comment on the County's FFY2019 Annual Action Plan Process.

At this meeting, Howard County will be announcing its Request for Proposals (RFP) as part of the FFY2019 Competitive Applications for Funding for both the HOME and CDBG Programs. The applications will be distributed after the Meeting. You can view the Public Notice here.

I have attached a PDF of the notice to this email. Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

***Please note our new office address as of July 17, 2018.**

Meadows, Elizabeth

From: Nkechi M. Animashaun <invite@eventbrite.com>
Sent: Thursday, December 13, 2018 11:39 AM
To: Meadows, Elizabeth
Subject: You're invited to FFY2019 Annual Action Plan Needs Hearing #2 (Jan 10, 2019)

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hello Elizabeth,

You are invited to the following event:

FFY2019 ANNUAL ACTION PLAN NEEDS HEARING #2

Event to be held at the following time, date, and location:

Thursday, January 10, 2019 from 1:30 PM to 3:30 PM (EST)

9820 Patuxent Woods Dr
9820 Patuxent Woods Drive
Suite 224, Room 211
Columbia, MD 21046

View Map

Attend Event

Event registration is by invitation only. Register with your email address to attend this event.

Howard County is in the process of preparing its FFY 2019 Annual Action Plan(AAP). The County will host its ***second*** public hearing on **January 10, *2019*, from 1:30 pm to 3:30 pm**, to inform the preparation of this plan. The meeting will begin with an overview of each funding source; Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program Federal Funds and Moderate Income Housing Units (MIHU) Fee-in-lieu program funds, all of which the

1

County will use to serve the low- and moderate income population of Howard County.

If you are interested in applying for any of the above funding sources, we urge you to attend. Following this meeting, the County will officially announce the Request for Proposals (RFP) and distribute applications.

Please feel free to share this invitation with other local non-profit service providers that work on affordable housing development and human services for at-risk populations in Howard County

If you haven't already, please complete the Needs Assessment Survey at the link below.

https://www.surveymonkey.com/r/FFY2019Needsassessment

We look forward to seeing you there. Should you have any questions, you may reach me at 410-313-6324 or via email at emeadows@howardcountymd.gov.

We hope you can make it!Cheers.Nkechi M. Animashaun

This invitation was sent to emeadows@howardcountymd.gov by the organizer of the event, Nkechi M. Animashaun.
To stop receiving invitations from this organizer, you can unsubscribe.

Eventbrite, Inc. | 155 5th St. 7th Floor | San Francisco, CA 94103

THE BALTIMORE SUN MEDIA GROUP

300 E. Cromwell Street
Baltimore, Maryland 21230
tel: 410/332-6000
800/829-8000

RECEIVED
JAN 08 2019
By

WE HEREBY CERTIFY, that the annexed advertisement of Order No 6032359

Sold To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd FL
Columbia,MD 21046

Was published in "Columbia Flier", "Weekly", a newspaper printed and published in Howard County on the following dates:

Dec 20, 2018

The Baltimore Sun Media Group

By S. Williamson

Legal Advertising

PUBLIC NOTICE/NOTICE OF PUBLIC MEETING

Howard County Department of Housing and Community Development
9830 Patuxent Woods Drive, Suite 204
Columbia, MD 21046

December 20, 2018

The Howard County Department of Housing and Community Development invites all interested citizens, community activists, representatives of non-profit organizations as well as public housing residents, the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs and the development of the FY2019 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1,257,864.00 in CDBG funds and $474,306.80 in HOME funds for the FY2019 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities directed to primarily benefit low to moderate-income residents. Activities may include but are not limited to housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. The Board invites any interested person to attend this public meeting which will include a brief presentation on the application process.

The Public Needs Hearing will be held on Thursday, January 10, 2019 at 7:00 PM at the Howard County Department of Housing and Community Development, Banneker Room, 3430 Court House Drive, Ellicott City, MD 21043.

Applications for funding will be available immediately following the meeting. The application will also be available at the Howard County Housing website at www.howardcountymd.gov, the Department's office at the address noted below and on the County's web page at www.howardcountymd.gov. The deadline for submission of applications is Monday, February 11, 2019 at 3:00 p.m.

If you cannot attend this meeting or would like additional information regarding the development of the FY2019 Annual Action Plan, please contact Elizabeth Knadlowe, Chief, Community Development and Grants, at 410-313-6324, or email at eknadlowe@howardcountymd.gov or visit the Howard County Housing office, 9830 Patuxent Woods Drive, Suite 204, Columbia, MD 21046.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at (410) 313-6318. Three working days prior to the hearing. Efforts will be made to accommodate the disabled and non-English speaking citizens with those for whom advance notice to Quanta Kareem, Constituent Officer, at 410-313-6318.

6032359 - 12/20/2018

THE BALTIMORE SUN MEDIA GROUP

300 E. Cromwell Street
Baltimore, Maryland 21230
tel: 410/332-6000
800/829-8000

RECEIVED
JAN 0 6
By

WE HEREBY CERTIFY, that the annexed advertisement of Order No 6032359

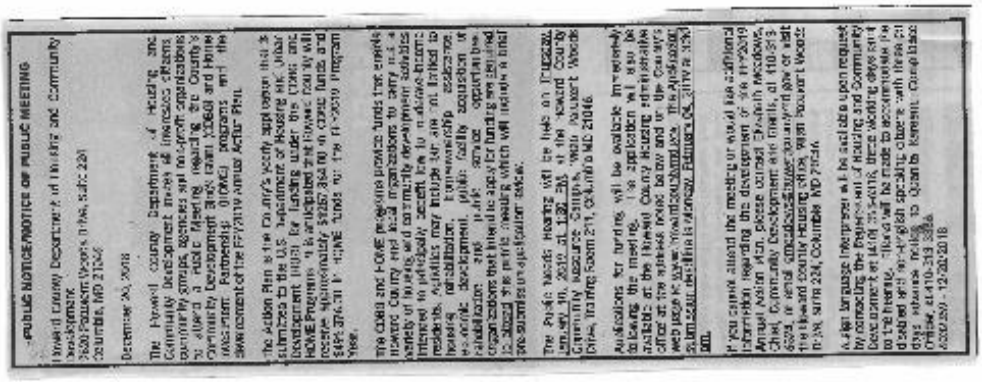
Sold To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd Fl.
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
6751 Columbia Gateway Dr
3rd Fl.
Columbia,MD 21046

Was published in "Howard County Times", "Weekly", a newspaper printed and published in Howard County on the following dates:

Dec 20, 2018

The Baltimore Sun Media Group
By
Legal Advertising



--PUBLIC NOTICE/NOTICE OF PUBLIC MEETING--

Howard County Department of Housing and Community Development
3430 Courtney Drive, Suite 201
Columbia, MD 21045

December 20, 2018

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to attend a Public Meeting regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FY2019 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $920,384.00 in CDBG funds and $491,376.00 in HOME funds for the FY-2019 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low to moderate-income residents. Activities may include but are not limited to housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities organizations that intend to apply for funding are required to attend the public meeting which will include a brief overview of the application process.

The Public Needs Hearing will be held on Thursday, January 10, 2019 at 1:30 PM at the Howard County Community Resource Campus, Voting Assembly Room (Room 211, Columbia MD 21046.

Applications for funding will be available immediately following the meeting. The application will also be available at the Howard County Housing administrative office at the address noted below and on the County's web page at www.howardcountymd.gov.

Submit all written comments to Maggie Palmer at the above address or via e-mail at mpalmer@howardcountymd.gov.

If you cannot attend the meeting or would like additional information regarding the development of the FY2019 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development via e-mail, at 410-313-6321, or send correspondence to the address noted below or visit the Howard County Housing office, 3430 Courtney Drive, Suite 201, Columbia MD 21045.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development at 410-313-6320. Efforts will be made to accommodate the disabled with hearing impairments or those requiring special services. Please call 48 hours in advance to request services. Relay 711 Voice/Relay (TTY/Voice) 1-800-735-2258

6032359 - 12/20/2018

Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Tuesday, February 26, 2019 11:40 AM
To: Kareem, Quanita; Animashaun, Nkechi
Subject: RE: FFY2019 Annual Action Plan

Hi Nkechi and Quanita;

Thank you so much for getting this onto the website yesterday!

When I came in this morning I made some formatting changes to the Projects section to make easier to see the numbers being served. I downloaded a new document with that change and saved it as a PDF on our shared drive.

Quanita, can you please pull what is currently on the website and replace with the updated PDF? You will find it in the same location Nkechi indicates in her email below.

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Kareem, Quanita
Sent: Monday, February 25, 2019 12:32 PM
To: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Cc: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan

Good afternoon

The website has been updated. Unfortunately, the system automatically puts spacing when I hit <return> so the address part looks weird.

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
Direct Dial: 410-313-3386
qkareem@howardcountymd.gov

1

From: Animashaun, Nkechi
Sent: Monday, February 25, 2019 12:04 PM
To: Kareem, Quanita <qkareem@howardcountymd.gov>
Cc: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: FFY2019 Annual Action Plan

Good morning Quanita,

Could you please place our FFY 2019 Annual Action Plan draft on the website today? This document can be placed below the public announcement and above the approved Annual Action Plan for FFY2018.

The verbiage that can precede the document is,

In accordance with federal requirements, Howard County has completed its FFY2019 Annual Action Plan Draft. Please click on the link below to review the document, and comments can be submitted to the attention of:

Ms. Elizabeth Meadows
9820 Patuxent Square Woods Drive,
Suite 224 Columbia MD 21046
410-313-3624
meadows@howardcountymd.gov

Since the document is too large to email, it can be found at the following location:
T:\Community Planning & Grants\ACTION PLANS\FFY2019\Draft Version

Please let me know if you need anything further from me, and thank you in advance.

Warmest Regards,

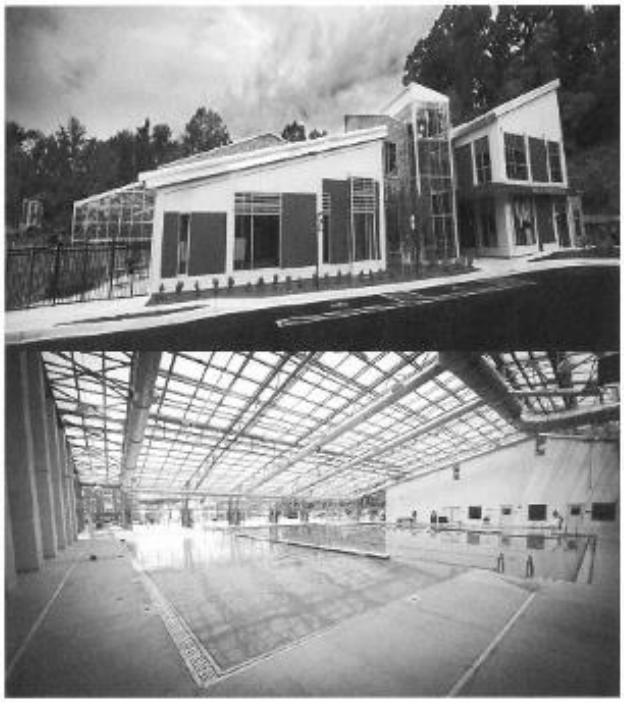
Nkechi M. Animashaun, HOME Program Specialist
Community Planning & Grants Management
HOWARD COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046
Direct Dial: 410-313-3693
Fax No.: 410-313-5960
nanimashaun@howardcountymd.gov

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

Departments

Community Planning and Grants



DHCD Grant Items

Public Notice/Notice of Public Meeting (March 13, 2019)

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget.

The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. You can view the Public Notice Here

FFY2019 Annual Action Plan - Draft

In accordance with federal requirements, Howard County has completed its FFY2019 Annual Action Plan Draft. Please click here to review the document , and comments can be submitted to the attention of:

Ms. Elizabeth Meadows

9820 Patuxent Square Woods Drive

Suite 224

Columbia, MD 21046

410-313-3624

meadows@howardcountymd.gov

FFY2019 Annual Action Plan Needs Survey

FFY2017 DRAFT Consolidated Annual Performance and Evaluation Report (FFY17 DRAFT CAPER)

Approved FFY2018 Annual Action Plan

HOME Program Policy Guide

Approved FFY2016-FFY2019 Consolidated Plan / FFY2016 Annual Action Plan

Howard County, Maryland
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

ask@howardcountymd.gov

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FFY2019 AAP PUBLIC HEARING # 3

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
6751 Columbia Gateway Drive, 3rd Floor ▪ Columbia, Maryland 21046 ▪ 410-313-6320
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

PUBLIC NOTICE
AND
NOTICE OF PUBLIC HEARING

Howard County Housing
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

February 21, 2019

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 AAP is the third AAP under the approved four (4) Year Consolidated Plan. A copy of the proposed FFY2019 AAP Draft with proposed budget will be available by February 25, 2019 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046 and on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/ .

Public Hearing Date and Location

Wednesday, March 13, 2019 **6:00PM**
Suite 224 – Housing Conference Room.
9820 Patuxent Woods Drive, Columbia, MD 21046

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearing and all comments must be received by the end of the thirty (30) day Public Comment Period. (11:59.99 PM, March 26, 2019)

Efforts will be made to accommodate the disabled and non-English speaking citizens and a sign language interpreter services will be available upon request with three (3) days advance notice to Quanita Kareem, Compliance Officer, Howard County Housing, at 410-313-3386, or email qkareem@howardcountymd.gov.

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6139902

Printed: 2/12/2019 11:14:52 AM

* Agency Commission not included

GROSS PRICE * : **$275.01**

PACKAGE NAME: CNG Howard County Times Single

PUBLIC NOTICE
AND
NOTICE OF PUBLIC HEARING

Howard County Housing
9820 Patuxerd Woods Drive, Suite 224
Columbia, MD 21046

February 21, 2019

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 AAP is the third AAP under the approved four (4) Year Consolidated Plan. A copy of the proposed FFY2019 AAP Draft with proposed budget will be available by February 25, 2019 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046 and on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/ .

Public Hearing Date and Location

Wednesday, March 13, 2019 6:00PM
Suite 224 - Housing Conference Room.
9820 Patuxent Woods Drive, Columbia, MD 21046

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearing and all comments must be received by the end of the thirty (30) day Public Comment Period. (11:59.99 PM, March 26, 2019)

Efforts will be made to accommodate the disabled and non-English speaking citizens and a sign language interpreter services will be available upon request with three (3) days advance notice to Quanita Kareem, Compliance Officer, Howard County Housing, at 410-313-3386, or email qkareem@howardcountymd.gov.
HCT CG 2/21/2019 #6139902

Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Tuesday, February 12, 2019 12:22 PM
To: 'Box, Rita'
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

Hi Rita;

This looks good.

Thanks, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Box, Rita [mailto:rbox@tribpub.com]
Sent: Tuesday, February 12, 2019 12:15 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Elizabeth,

Thank you for your legal notice request.

A proof and quote is attached for your review and approval. Your response is needed by TUES 2/19 BEFORE 12PM EST to ensure the notice is printed on THURS 2/21 in the HOWARD COUNTY TIMES $ COLUMBIA FLIER. Please let me know if there are any changes needed to be made.

Ad number for reference: 6139902
Amount: $275.01
Billed Account Name: Howard County Dept of Housing 6751 Columbia Gateway Dr 3rd FL, Columbia, MD 21046
Billed Account Number: CU00168892

Thank you,
Rita Box
Inbound Advertising Representative

1

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From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Tuesday, February 12, 2019 10:09 AM
To: Harris, Ellen; Welenc, Charlie; cnglegal@tronc.com
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearing

EXTERNAL SOURCE

Good Morning;

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **February 21, 2019** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

2

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
6751 Columbia Gateway Drive, 3rd Floor ■ Columbia, Maryland 21046 ■ 410-313-6320
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

FFY2019 Public Need Hearing
Action Plan Public Hearing/Public Meeting #3
Wednesday, March 13, 2019 6pm
Suite 224 – Housing Conference Room
9820 Patuxent Woods Drive, Columbia, MD 21046

- **Introduction of Staff and Overview** – by Elizabeth Meadows
    - Elizabeth Meadows, Chief, Community Planning and Grants
- **Needs Hearing Requirement**
    - Action Plan Description
    - CDBG Program Budget Overview
    - HOME Program Budget Overview
- **Open for Questions and Answers**
- **Exit**
    - Next Steps in Process
    - Public Hearing #4 and Public Hearing #5
    - If Questions, contact Elizabeth Meadows – emeadows@howardcountymd.gov

FFY2019 AAP Needs Hearing # 3

No one attended Public Hearing and no comments or concerns were received.

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Thursday, February 21, 2019 8:27 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi
Subject:	Grant Page Update and Action Plan Notice for Webpage
Attachments:	PUBLIC NOTICE_FFY2019 Action Plan_30 day.docx

Hi Quanita:

I have a couple items that is needed for our Grants page by Monday, February 25, 2019.

Can you please pull the following from our Grants webpage?

FFY2019 and FY20 Request for Proposals

Please download the application of the program to which you intend to apply. You can email grant staff at nanimashaun@howardcountymd.gov for a Microsoft Word version if the application if necessary.

- FFY2019 Application for Funding HOME
- FFY2019 Application for Funding CDBG
- FY2020 Application for Funding MCHC Fee-in-lieu

Public Notice/ Notice of Public Hearing (January 10, 2019)

The Howard County Department of Housing and Community Development will host a Public Meeting regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs and the development of the FFY2019 Annual Action Plan. This is the second opportunity for the public to comment on the County's FFY2019 Annual Action Plan Process

At this meeting, Howard County will be announcing its Request for Proposals (RFP) as part of the FFY2019 Competitive Applications for Funding for both the HOME and CDBG Programs. The applications will be distributed after the Meeting. You can view the Public Notice here.

Please Replace with the attached Public Notice and narrative that follows.

Public Notice/Notice of Public Meeting (March 13, 2019)

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget.

The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. You can view the Public Notice Here

Also, I want to let you know that our draft FFY2019 Annual Action Plan need to put onto website on Monday as well. We are still finishing the draft.

1

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

2

FFY2019 AAP PUBLIC HEARING # 4

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

PUBLIC NOTICE / NOTICE OF PUBLIC HEARINGS

Howard County Housing
9820 Patuxent Woods Drive, Meeting Room 212
Columbia, MD 21046

March 28, 2019

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 AAP is the final AAP under the approved four (4) Year Consolidated Plan.

Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities for low and moderate-income residents. The Howard County draft FFY2019 Action Plan was made available for review and comment starting February 25, 2019 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046. The Action Plan Draft is also available on the Howard County Housing webpage of the County's website at www.howardcountymd.gov under "Departments".

Public Hearing Dates and Locations

Thursday, April 11, 2019 – 6:00 PM	**9820 Patuxent Woods Drive** **Meeting Room 212** **Columbia, MD 21046**
Monday, April 22, 2019 – 7:00 PM	**Banneker Room** **George Howard Building,** **3430 Court House Drive** **Ellicott City, MD 21043**

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearings and all comments must be received by the end of the day on April 22, 2019. (5pm)

Efforts will be made to accommodate the disabled and non-English speaking citizens and a sign language interpreter services will be available upon request with three (3) days advance notice to Quanita Kareem, Compliance Office, Howard County Housing Department, at 410-313-3386, or email qkareem@howardcountymd.gov.

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Monday, March 18, 2019 11:37 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi; Wall, Thomas F
Subject:	Webpage Updates for the upcoming Action Plan Public Hearings
Attachments:	PUBLIC NOTICE.docx

Hi Quanita:

There are 2 changes to our webpage that we hope can done by Thursday, March 28th, at end of the day.

Can you please remove the following:

Public Notice/Notice of Public Meeting (March 13, 2019)

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2018 Annual Action Plan (AAP) Draft and proposed Budget.
The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. You can view the Public Notice Here.

PLEASE REPLACE WITH: the following narrative and the attached Public Notice

Public Notice / Notice of Public Hearings – FFY2019 Action Plan

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2019 Action Plan Draft and proposed Budget. The Action Plan is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 Action Plan is the final Action Plan under the approved four (4) Year Consolidated Plan. Citizens can view the Public Notice by clicking here.

Public Hearing Dates and Locations

Thursday, April 11, 2019 – 6:00 PM	**9820 Patuxent Woods Drive** **Meeting Room 212** **Columbia, MD 21046**
Monday, April 22, 2019 – 7:00 PM	**Banneker Room** **George Howard Building,** **3430 Court House Drive**

1

Ellicott City, MD 21043

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

2

THE BALTIMORE SUN MEDIA GROUP

Order ID: 8194351

Printed: 3/18/2019 1:53:42 PM

* Agency Commission not included

GROSS PRICE * : **$296.42**

PACKAGE NAME: CNG Howard County Times Single

PUBLIC NOTICE / NOTICE OF PUBLIC HEARINGS
Howard County Housing
9820 Patuxent Woods Drive, Meeting Room 212
Columbia, MD 21046
March 28, 2019

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 AAP is the final AAP under the approved four (4) Year Consolidated Plan. Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities for low and moderate-income residents. The Howard County draft FFY2019 Action Plan was made available for review and comment starting February 25, 2019 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046. The Action Plan Draft is also available on the Howard County Housing webpage of the County's website at www.howardcountymd.gov under "Departments".

Public Hearing Dates and Locations
Thursday, April 11, 2019 – 6:00 PM
Meeting Room 212
9820 Patuxent Woods Drive Columbia, MD 21046

Monday, April 22, 2019 – 7:00 PM
Banneker Room George Howard Building,
3430 Court House Drive Ellicott City, MD 21043

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearings and all comments must be received by the end of the day on April 22, 2019. (5pm)
Efforts will be made to accommodate the disabled and non-English speaking citizens and a sign language interpreter services will be available upon request with three (3) days advance notice to Quanita Kareem, Compliance Office, Howard County Housing Department, at 410-313-3386, or email qkareem@howardcountymd.gov.
HCT CF 3/28/2019 #6194351

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Monday, March 18, 2019 3:26 PM
To:	'Box, Rita'
Cc:	Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject:	RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

Thanks Rita

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Box, Rita [mailto:rbox@tribpub.com]
Sent: Monday, March 18, 2019 3:23 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Elizabeth,

Ad #6194351 has been submitted in for publish.

Rita Box
Inbound Advertising Representative

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Sent: Monday, March 18, 2019 1:56 PM
To: Box, Rita

Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

EXTERNAL SOURCE

Hi Rita;

This looks good for publication. Thanks for your patience.

Regards, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Box, Rita [mailto:rbox@tribpub.com]
Sent: Monday, March 18, 2019 2:54 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

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Review and approve revised proof.

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From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Monday, March 18, 2019 1:49 PM
To: Box, Rita
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

2

EXTERNAL SOURCE

Hi Rita:

There were two I found that I had missed:

1. In the last line of paragraph 1, change third to final (final AAP)
2. In the last line of paragraph 3, change April 15, 2018 to April 22, 2019

Thanks. Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Box, Rita [mailto:rbox@tribpub.com]
Sent: Monday, March 18, 2019 2:08 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wali, Thomas F <tfwali@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

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Elizabeth,

It would be more efficient to state the change so the ad does not have be done again from the start. I can just edit it instead.

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From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Monday, March 18, 2019 12:26 PM
To: Box, Rita
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

EXTERNAL SOURCE

Hi Rita;

I just noticed an error in the Public Notice I had not caught until I proofed this. Can you please use this version I have included that has the corrected language?

Thanks! Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

From: Box, Rita [mailto:rbox@tribpub.com]
Sent: Monday, March 18, 2019 12:49 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

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M. Elizabeth,

Thank you for your legal notice request.

A proof and quote is attached for your review and approval. Your response is needed by TUES 3/26 BEFORE 12PM EST to ensure the notice is printed on THURS 3/28 in the HOWARD COUNTY TIMES/COLUMBIA FLIER. Please let me know if there are any changes needed to be made.

Ad number for reference: 6194351
Amount: $296.42
Billed Account Name: Howard County Dept of Housing 9820 Patuxent Woods Drive #224 , Columbia, MD 21046
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Thank you,
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From: Meadows, Elizabeth [mailto:emeadows@howardcountymd.gov]
Sent: Monday, March 18, 2019 10:42 AM
To: Harris, Ellen; Welenc, Charlie; cnglegal@tronc.com
Cc: Animashaun, Nkechi; Wall, Thomas F; Delk, Tracy
Subject: FFY2019 Annual Action Plan Public Notice & Notice of Public Hearings

EXTERNAL SOURCE

Good Morning;

Customer # CU00168892

Please publish the attached Public Notice/Notice of Public Meeting in the **March 28, 2019** issues of the Howard County Times and Columbia Flier.

The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

Thanks very much, Elizabeth

M. Elizabeth Meadows, Chief
Community Planning and Grants
HOWARD COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224
Direct Dial: 410-313-6324
emeadows@howardcountymd.gov

5

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

Departments

Community Planning and Grants

DHCD Grant Items

Public Notice/Notice of Public Hearings - FFY2019 Action Plan

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2019 Action Plan Draft and proposed Budget. The Action Plan is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 Action Plan is the final Action Plan under the approved four (4) Year Consolidated Plan. Citizens can view the Public Notice by clicking here.

Public Hearing Dates and Locations

Thursday, April 11, 2019 – 6:00 PM **9820 Patuxent Woods Drive**
Conference Room 212
Columbia, MD 21046

Monday, April 22, 2019 – 7:00 PM **Banneker Room**
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

FFY2019 Annual Action Plan - Draft

FFY2017 DRAFT Consolidated Annual Performance and Evaluation Report (FFY17 DRAFT CAPER)

Approved FFY2018 Annual Action Plan

HOME Program Policy Guide

Approved FFY2016-FFY2019 Consolidated Plan / FFY2016 Annual Action Plan

Howard County, Maryland
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043
ask@howardcountymd.gov

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HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
9820 Patuxent Woods Drive, Suite 224 ▪ Columbia, Maryland 21046 ▪ 410-313-6318
Voice/Relay
Kelly A. Cimino, Director FAX 410-313-5960

FFY2019 Public Need Hearing
Action Plan Public Hearing/Public Meeting #4
Thursday, April 11, 2019 6pm
Meeting Room 212
9820 Patuxent Woods Drive, Columbia, MD 21046

- **Introduction and Overview** – Elizabeth Meadows, Chief, Community Planning and Grants
- **Needs Hearing**
  - Action Plan Description
  - CDBG Program Budget Overview
  - HOME Program Budget Overview
  - Needs identified through FFY2019 Annual Action Plan needs hearing session
- **Open for Questions and Answers**

Next Steps in Process

- Public Hearing #5
- Submission due date to HUD: May 17, 2019
- If Questions, contact Elizabeth Meadows – emeadows@howardcountymd.gov

FFY2019 ANNUAL ACTION PLAN BRIEFING NOTES

Background:

Howard County, MD receives annual allocations of the Community Development Block Grant (CDBG) and the HOME Investment Partnership (HOME) Program funding from the U.S. Housing and Urban Development (HUD) to be used for community development and affordable housing benefiting low-income residents of Howard County between 0-80% area median-income (AMI). A key feature of these grants is that a grantee has the ability to choose how the funds will be used; which makes them very flexible funding tools to serve at-risk populations based on the needs in the community.

In accordance with federal requirements for jurisdictions receiving funds from HUD for housing and community development programs, Howard County has prepared its FFY2019 Annual Action Plan, which is the 4th and final year of its four-year Consolidated Plan for FFY2016-2019. This Action Plan outlines how the County will use federal resources to address the current housing and community development needs of our low to moderate income population, while remaining aligned with the goals outlined in our Consolidated Plan.

Howard County has completed the planning and writing of the FFY2019 Annual Action using estimated amounts that are the awarded totals the County received in FFY2018 for both CDBG and HOME programs. The County anticipates receiving $1,257,864 in CDBG and $491,376 in HOME funds for the FFY 2019 program year. To maintain compliance with requirements and timing for submission of the Annual Action Plan to HUD, the County has chosen to move forward with the planning, writing, 30-day public comment period with the anticipated amounts for these programs.

TOP NEED IDENTIFIED – HOUSING AFFORDABILITY

Howard County remains the wealthiest county in Maryland, with a median household income of $115, 576 and the third wealthiest county nationwide according to the American Community Survey conducted by the United States Census Bureau. Howard County's FFY2016-2019 Consolidated Plan identifies that housing affordability is the primary barrier to households finding accessible, decent, safe and sanitary housing; 46.8 % of all renter households and 42.3% of all homeowner households are cost burdened by 30% or more. Also, the need for this housing far exceeds the supply of housing; especially for cost-burdened and low-income (LI) (6,039), very low-income (VLI) (5,265), and extremely low-income (ELI) (4,330) households in the County.

In Howard County, the affordable housing shortage has made ELI, VLI and LI renter households extremely housing cost burdened. Information gathered during our FFY19 Annual Action Plan Needs Hearing, showed households in the County struggling with excessive credit card debt used for everyday living expenses, many of these clients have a 75% housing cost burden. This trend is not limited to the working population but also to many senior citizens who are on fixed incomes. Many Howard County residents that receive services are single-female-headed households and are forced to work multiple jobs just to make ends meet. Annual rent increases

impact the household's stability, and over time makes a unit that was once affordable, unaffordable.

Coupling this housing scarcity is the fact that household incomes are not keeping pace with housing costs. The Consolidated Plan identifies, that lower-income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems. Being rent and mortgage overburdened can cause low-income residents to become unstable or face homelessness due to a one-time crisis, loss of income, or health issue.

CONCERN

The Con Plan identifies, using U.S. Census data; that lower income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems. The concern about rent and mortgage overburdened households is that low-income resident that experience rent or mortgage overburden become unstable and face homelessness with first-time crises, loss of income, or health issues.

AFFORDABILITY GAP CONTINUES

The FFY19 Annual Action Plan, the final year of our 4-year plan, awarded funding to projects that address the priorities identified through the County's Needs Hearing and citizen participation process. This process revealed that the County's current needs and priorities remain to be reflective of the broader issues received during the development of Howard County's FFY2016-2019 Consolidated Plan.

Through this application, Howard County is working to not only preserve the affordable housing stock through housing rehabilitation projects but is also increasing the availability of affordable permanent housing for persons with disabilities and facing homelessness. To encourage homeownership, Howard County is working with income eligible households by providing access to down payment and closing cost assistance.

To address the complex issues contributing to homelessness in the County the activities submitted provide a multi-faceted network of programs and support services that prevent homelessness as often and as soon as possible by coordinating care for homeless individuals and families, ultimately assisting them in becoming self-sufficient.

POPULATIONS/HOUSEHOLDS MOST AFFECTED

The Consolidated Plan identifies, based upon analysis of information provided by the U.S. Census data; lower income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems.

BEING SUBMITTED TO HUD THROUGH THE 4th YEAR ACTION PLAN

FFY2019 CDBG ACTIVITIES BEING SUBMITTED TO HUD

1. **Roger Carter Recreation Center – $200,000.00** - Howard County invests annually under an acquisition by long-term lease arraignment for this public facility. The center is a key vehicle for neighborhood revitalization.
2. **Emergency Public Facility - $24,000.00** – Howard County invests annually under an acquisition by long-term lease arraignment of a public facility. This activity will ensure the safety of Howard County residents struggling with situations of domestic violence.
3. **Rebuilding Together – Homeowner Rehab - $175,266.00** – Rebuilding Together will use CDBG funding to provide free home repairs to income-eligible Howard County residents. The program was developed as a key tool in Howard County's toolbox to preserve affordable housing stock for income-eligible homeowners in the county.
4. **Route One Day Resource Center - $42,000 – Grassroots Crisis Intervention Center** will use CDBG funding for leasing and utility expenses associated with the day center. The center provides critical social and support services to both shelter and unsheltered homeless.
5. **Hope Works of Howard County – 35,621.13** – Hope Works will use CDBG funding to provide partial salary for the Transitional Housing Victims Advocate and partial utility payment for their transitional house. The program provides housing to Howard County residents that are made homeless due to sexual and intimate partner violence.
6. **The Community Action Council (CAC) – Housing Stability - $100,000.00** – CAC will use CDBG funding to provide housing stability services to income-eligible Howard County households. This activity will keep 63 households from becoming homeless over this program year.
7. **Bridges to Housing Stability – $250,182.88** - Bridges will use CDBG fund to acquire one housing unit to rent to persons working in Howard County earning between 30 % - 60% of the Howard County median income.
8. **Bridges to Housing Stability – $50,000.00** – Bridges will use CDBG funds to rehabilitate twelve (12) rental housing units they own in their Alliance Program portfolio in FFY19
9. **Living In Recovery (LIR) – Facilities Improvement - $25,000.00** – LIR will use CDBG funding for a roof replacement, bathroom renovations, regrade yard, install asphalt, reconfigure basement, and replace floor covering in one their sober living facilities.
10. **Help End Homelessness (HEH) – Facilities Improvement - $15,000.00** – Help End Homelessness will use CDBG funding to replace the failing HVAC system with a more energy efficient unit is one the units they own that houses a previously homeless Howard County family.

11. **The Arc of Howard County – Facilities Improvement - $100,000.00** – The Arc will use CDBG funding for the replacement of the failing roof on the facility that supports many activities and programs for persons with intellectual and developmental disabilities.

12. **Fair Housing Regional AI Coordinator - $6,400.00** – Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County in cooperation with these jurisdictions contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which was formally accepted in February 2012. The AI Coordinator works to guide the implementation of the regional initiatives to address identified potential impediments to Fair Housing Choice. *This activity is funded out of the 20% Administration cap.*

13. **Office of Human Rights - Fair Housing Activity - $60,000.00** – the Howard County Office of Human Rights will use CDBG funding to conduct match paired testing of market rate unit in the County. This activity proposes to address several of the impediments to fair housing that were identified in the 2012 Analysis of Impediments to Fair Housing Choice (AI). *This activity is funded out of the 20% Administrative cap.*

14. **CDBG Admin. - $185,172.80** – Howard County will use CDBG funds towards the administration of the CDBG program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered.

    Howard County will use a portion of CDBG Admin funds to hire a consultant for the planning and writing of our FFY2020-FFY2024 Consolidated Plan / FFY20 Annual Action Plan.

    The Consolidated Plan is a strategy document designed to help the County to assess affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CDBG and HOME Programs

FFY2019 HOME PROGRAM ACTIVITIES BEING SUBMITTED TO HUD

1. **Ihomes CHDO Project - $200,000.00** – I-Homes Inc. will use HOME Program funds to to complete the design, develop, build of three single family dwelling units for persons with varying degrees of developmental and physical disabilities. Additionally, the funds will be gap funding for the acquisition of 3 existing condominium units to provide housing for extremely-low income persons with disabilities. I-Homes Inc. is certified as a Community Housing Development Corporation (CHDO).

2. **FFY2019 Future Affordable Housing Project – 153,002.59** – Howard County will allocate HOME Program funds for property acquisition, disposition, and rehabilitation in connection with the development of affordable housing unit. This includes but is not

limited to the provision of rental housing, tenant-based rental assistance or homebuyer activities that will create affordable housing units and ultimately prevent and reduce instances of homelessness. *This activity will use $30,764.19 in Program Income as part of the funding.*

3. **Down Payment Assistance – $120,000.00** - Howard County Department of Housing and Community Development will provide down payment and /or closing cost assistance to eligible homebuyers for the purchase of one dwelling unit in Howard County. Eligible awardees will meet the HUD program household income limits and attend homebuyer workshops offered in the County.

4. **HOME Admin - $49,137.60** – Howard County will use HOME funds towards the administration of the HOME program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered.

Howard County, Maryland
Needs Hearing # 1 – FFY2019 Annual Action Plan Planning Session
Date: Thursday, December 6, 2018 at 1:30 pm

In attendance:
See attached sign-in sheet

Agenda:
Greeting from Director Cimino
Introductions of Staff
Overview of Process
Action Plan Process and Timeline
Non-profit Roundtable for Briefing County Staff on Needs
Survey Discussion
Next Meeting – January 10, 2019

- **Community Action Council of Howard County**
- **Homeless Prevention** funding for households above 30% AMI is getting more difficult to find. Using CDBG and the County's Community Services Partnership (CSP) funding for preventing households from being evicted.
- With the State collapsing their homeless funding the agency is being forced to look at non-traditional funders than before.
- When working with household, due to tightening funds, the agency is not able to put enough funding into the financial crisis to stabilize the household.

Special Needs Populations –

- **The Arc of Howard County**
  - Particular challenge again this year is rehabilitation work needed to the agency building dedicated to serve persons with disabilities. The aging roof of the building needs to be replaced and interior water damage repaired.
- Funding from State Disability Determination Service (DDS) and Medicare done on reimbursement bases
- Uncertain funding from the Maryland Developmental Disabilities Administration (DDA)
- Regulations from the State require individual leases with all their clients. This make it more difficult to serve more clients due to the regulations.
- Clients are really hard on the residential houses.
- Because of the additional requirements placed on the agency now, and because of the high level of maintenance to upkeep the residential units, it is not cost effective to buy additional house.
- The agency is strategically pulling in their operational overhead to try to build up cash reserves to be able to respond to future needs.
- They are not looking to add to their portfolio. Because of that they are not able to serve everyone that needs services.
- Unable to serve the persons with the more intensive needs.
- Deinstitutionalization of system beds complicates the ability to serve these at-risk clients because there are not enough units available.
- Need deep subsidies to keep units affordable and livable.

- **Camp Attaway** – a three-week summer day program for children with emotional and behavioral disorders in Howard County.
- 23 years serving children with severe needs - Staff to child ration: 1 to 2.
- There is a need for year-round supports for the families being served by the program.
- Families need additional supports to help with the stress on the family.
- More families with this need than they are able to serve.
- There is no year-round facility.
- Dedicated space is needed for the program.
- Not enough staff.
- No daycare for these special need children.
- Parent training is needed to help them to manage the child's behavior.
- Scholarships for low-income residents needed.
- Special Care Educator is needed – many children tend to be exposed to behavioral issues. The child could be pulled out of the group setting with the additional staff.
- **Autism Specific –**
- Need supports for families.
- High PTSD among families - Respite Care needed.
- **Making Change** – provide 1st time homebuyer education and debt reduction training for potential MIHU homeowners
- Beginning to plan program to do financial management classes for residents in Rapid Rehousing in Howard County's CoC.
- **Needs being seen through the current Financial Coach**
  - Low-to moderate income clients being referred to DSS and CAC because of trouble with maintaining rental cost
  - Many clients they see have a 75% housing cost burden
  - Increase senior residents with same high cost burden and extreme card debt. Many of them living on limited income such as SSI or SSDI.
  - Households they serve have extreme credit debt because there are forced to use the credit card for regular living expenses.
  - Single female headed households working multiple jobs or in school primary clients being seen.
  - Rent increase impact the household stability.
  - Income not keeping pace with the increasing cost of rental housing.
  - Increase this past year with senior experiencing housing crisis due to illness related costs on the household. Look for help managing debt payment and budget.
  - Financial Coach does a "soft handover" to other agencies in the Nonprofit Collaborative where they are located that can help with other needs of the households.
  - Whole lot of referrals needed with these clients as well as the high amount of follow up required for these households.
- **Howard County Department of Social Services (DSS)** – Emergency financial and housing assistance for persons in crisis, child protective services, food stamps, income maintenance, medical assistance, adoption and foster care.
- Social Worker only provided around the child protective services.
- Children aging out of Foster Care – no group homes in Howard County
- Group homes are in other counties which is where they receive their services.

- Those that want to come back to Howard County (because it is their home) the high cost of housing in the county put additional stresses on the person.
  - **Needs being seen**
  - Precarious housing situations
  - $400 water bill need help with
  - Broken down car
  - Large financial crisis in family
- Support Services would only focus around the Family Protective Order. They refer to other agencies for other needs in the household
- **Rebuilding Together** – been serving Howard County households for 26 years. Renovations and improvements to help improve the safety and livability of the homes allowing the homeowners to remain in their homes.
- 80 homes completed last year.
- Help with homeowners in Ellicott City impact by the 2 floods (2016 & 2018).
- Partnership with local nonprofits (Bridges to Housing Stability and Humanim) providing renovations to group homes to keep them safe and livable.
- Through CDBG funding, able to do significant repairs to the home.
- Expensive repairs
  - **Needs being seen**
  - Urgent repair funding is needed. Not able to do urgent needs with CDBG due to the environmental timing required.
  - Increased need for home modifications, accessibility and aging-in-place upgrades.
  - Seeing an increase demand for CDBG funded renovation and upgrades by income eligible homeowners. More than funding allows
- Handy Man Services created – group of 15 volunteers that go into homes that only need minor repairs.
- **Bridges to Housing Stability** – been serving Howard County homeless and low-income families for 28 years.
- Housing Solutions - provides transitional housing, rapid rehousing, housing connections services.
- Some clients they work with have a criminal background which makes it difficult when working with landlords.
- Some families need help with eviction prevention to avoid the household falling into homelessness.
- Many households need below market rents to make it on their own.
- Happy about getting the case management residents receive from Bridges.
- Tough to get landlords to reduce rents since Howard County has such a low vacancy rate. The landlord can charge what they want because the market is so competitive.
- Clients with disabilities are difficult to house.
- Fair Housing issues – Family households are being discriminated against.
- Landlords don't like working with short-term subsidies, especially when the low-income household may not be able to afford the rent once the subsidy ends.
- 6-12 month subsidies typical.
- Clients want to stay in Howard County.
- **Needs seen in program**
  - Not enough affordable units available. Need more choices

- Need studios and single room occupancy (SRO) for extremely low-income seniors and individuals.
- More innovative housing / Other choices than what is currently used to respond to the demand.

- **Living in Recovery (LIR)** – since 2010 providing sober housing for men and women in Howard County with support services and peer supports in an environment of accountability.
- Need for recovery housing not being met prior in Howard County.
- LIR has 3 men's houses and 2 women's houses.
- Many of the clients that struggled with addictions tend to have burned all of bridges in the personal world.
- Real estate too expensive in Howard County.
- Have been able to have paid staff for the couple of years. Started out with all volunteer run.
    - **Needs of the program**
    - Funding for acquisition and staff costs
    - Have seen an increased demand (211 overdoses in Howard County).
    - Most have a drug addition, with no job and no money. Most have been cut off by their families.
    - More calls than they are able to serve.
- LIR is having good outcomes / Must be clean.
- Are getting some referrals from the Howard County Jail.
- Work with the clients to get job / looking for apprentice type jobs which will pay more
- There is a 30-day subsidy available. Only 25% of clients use it.
- 12-Step Program used in recovery treatment.
- Develop employment in stages – building job skills.
- Rental housing is needed.
- **Notes on Homeless CoC**
- Challenge with filling permanent supportive housing (PSH) units quickly
- Challenges in keeping in contact with homeless on list.
- Outreach is limited.
- Need a fully functioning Outreach Team.
- In past 10 months, homeless with significant barriers / higher vulnerability index presenting.
- Not enough staff to work with homeless / more than just not having a unit
- More housing subsidies needed / more vouchers to serve the need.

PUBLIC COMMENT HEARING # 4

APRIL 11, 2019 - 6:00 pm

9820 PATUXENT WOODS DRIVE

NO COMMENTS OR CONCERNS RECIEVED

FFY2019 AAP PUBLIC HEARING # 5

HOWARD COUNTY DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT
6751 Columbia Gateway Drive, 3rd Floor ▪ Columbia, Maryland 21046 ▪ 410-313-6320
Voice/Relay

Kelly A. Cimino, Director FAX 410-313-5960

PUBLIC NOTICE / NOTICE OF PUBLIC HEARINGS

Howard County Housing
9820 Patuxent Woods Drive, Meeting Room 212
Columbia, MD 21046

March 28, 2019

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2019 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2019 AAP is the third AAP under the approved four (4) Year Consolidated Plan.

Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities for low and moderate income residents. The Howard County draft FFY2019 Action Plan was made available for review and comment starting February 25, 2019 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046. The Action Plan Draft is also available on the Howard County Housing webpage of the County's website at www.howardcountymd.gov under "Departments".

Public Hearing Dates and Locations

Thursday, April 11, 2019 – 6:00 PM	**9820 Patuxent Woods Drive** **Meeting Room 212** **Columbia, MD 21046**
Monday, April 22, 2019 – 7:00 PM	**Banneker Room** **George Howard Building,** **3430 Court House Drive** **Ellicott City, MD 21043**

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearings and all comments must be received by the end of the day on April 15, 2018. (5pm)

Efforts will be made to accommodate the disabled and non-English speaking citizens and a sign language interpreter services will be available upon request with three (3) days advance notice to Quanita Kareem, Compliance Office, Howard County Housing Department, at 410-313-3386, or email qkareem@howardcountymd.gov.

Howard County
Internal Memorandum

Subject: Testimony and Fiscal Impact Statement for:
Resolution No. ___ - 2019
Adopting the FFY2019 Annual Action for Community Development Block Grant (CDBG) & HOME Investment Partnership Program (HOME)

To: Lonnie R. Robbins
Chief Administrative Officer

From: Kelly Cimino K. Cimino
Director
Department of Housing and Community Development

Date: March 13, 2019

Resolution No. ___ approves the FFY2019 Annual Action for the Community Development Block Grant (CDBG) program and the Home Investment Partnership Program (HOME). The FFY2019 Annual Action Plan is required as a precondition to receiving the County's annual entitlement of CDBG and HOME Program funds from the U.S. Department of Housing and Urban Development (HUD).

BACKGROUND

In 2016, Council Resolution 51-2016 adopted Howard County's current Four-Year Consolidated Plan. The Consolidated Plan is a planning document that summarizes local housing and non-housing needs; housing market and inventory conditions; outlines a four-year strategy; identifies available federal, state and local resources needed and anticipated to implement the strategies; and presents specific goals and objectives for each strategy. The Annual Action Plan is the implementing document for the strategies in the Consolidated Plan and is required by HUD in order to obtain the CDBG and HOME Program funding.

The primary objective of the CDBG and HOME Programs is to develop viable communities by providing decent affordable housing, creating suitable living environments, and expanding economic opportunities, principally for persons of low and moderate income.

In order to receive the annual entitlement grants for FFY2019, which will begin on July 1, 2019, and to continue to be eligible as an Urban County Entitlement community, Howard County must adopt an Annual Action Plan. The attached draft Annual Action Plan outlines the proposed activities that will be undertaken for the upcoming program year.

The FFY2019 Annual Action Plan is the third Plan under the current Consolidated Plan covering FFY16-FFY19. Howard County Department of Housing and Community Development has developed the draft Action Plan in consultation with multiple county agencies, various nonprofit agencies, local advocates, the Housing and Community Development Board and several local and regional service providers of housing and human services.

Howard County, in compliance with the County's Citizen Participation Plan, advertised and held three (3) public hearings on the needs and goals of the County's CDBG and HOME Programs. The public hearings provided residents with the opportunity to discuss the programs and to offer their suggestions on future program priorities. The public hearings were advertised in The Howard County Times and Columbia Flier on November 15, 2018, December 20, 2018 and February 21, 2019.

Additionally, during the planning phase of the Howard County's FFY2019 Annual Action Plan, the Department's staff created an online survey to acquire additional feedback from human service and housing providers, as well as advocates serving clients in Howard County. The survey was posted on the County's website for anyone that was interested in taking the survey. The survey was open from December 6, 2018 until February 28, 2019.

The draft FFY2019 Action Plan was available for the required 30-day public review and comment period at Howard County Housing's offices at the Gateway building. The comment period ran from February 25 thru March 26, 2019. The Plan was also available on the County's website on the department's webpage at www.howardcountymd.gov.

FISCAL IMPACT

The entitlement awards to Howard County will provide funding in the total anticipated amount of $1,749,240.00 (CDBG: $1,257,864; HOME: $491,376). The grants cover both program and related administrative costs. The amounts have been incorporated into the County Fiscal Year 2019 budget.

The Department recommends approval of this Resolution.

Cc: Calvin B. Ball, Howard County Executive (w/draft Action Plan)
Lonnie R. Robbins, Chief Administrative Officer
Sameer Sidh, Chief of Staff (w/draft Action Plan)
Jennifer Sager, Legislative Coordinator (w/draft Action Plan – 10 copies)
Gary W. Kuc, County Solicitor (w/draft Action Plan)
Holly Sun, Budget Administrator
Elizabeth Meadows, Chief, Community Planning and Grants
Housing and Community Development Board

FFY2019 ANNUAL ACTION PLAN BRIEFING NOTES

Background:

Howard County, MD receives annual allocations of the Community Development Block Grant (CDBG) and the HOME Investment Partnership (HOME) Program funding from the U.S. Housing and Urban Development (HUD) to be used for community development and affordable housing benefiting low-income residents of Howard County between 0-80% area median-income (AMI). A key feature of these grants is that a grantee has the ability to choose how the funds will be used; which makes them very flexible funding tools to serve at-risk populations based on the needs in the community.

In accordance with federal requirements for jurisdictions receiving funds from HUD for housing and community development programs, Howard County has prepared its FFY2019 Annual Action Plan, which is the 4th and final year of its four-year Consolidated Plan for FFY2016-2019. This Action Plan outlines how the County will use federal resources to address the current housing and community development needs of our low to moderate income population, while remaining aligned with the goals outlined in our Consolidated Plan.

Howard County has completed the planning and writing of the FFY2019 Annual Action using estimated amounts that are the awarded totals the County received in FFY2018 for both CDBG and HOME programs. The County anticipates receiving $1,257,864 in CDBG and $491,376 in HOME funds for the FFY 2019 program year. To maintain compliance with requirements and timing for submission of the Annual Action Plan to HUD, the County has chosen to move forward with the planning, writing, 30-day public comment period with the anticipated amounts for these programs.

TOP NEED IDENTIFIED – HOUSING AFFORDABILITY

Howard County remains the wealthiest county in Maryland, with a median household income of $115, 576 and the third wealthiest county nationwide according to the American Community Survey conducted by the United States Census Bureau. Howard County's FFY2016-2019 Consolidated Plan identifies that housing affordability is the primary barrier to households finding accessible, decent, safe and sanitary housing; 46.8 % of all renter households and 42.3% of all homeowner households are cost burdened by 30% or more. Also, the need for this housing far exceeds the supply of housing; especially for cost-burdened and low-income (LI) (6,039), very low-income (VLI) (5,265), and extremely low-income (ELI) (4,330) households in the County.

In Howard County, the affordable housing shortage has made ELI, VLI and LI renter households extremely housing cost burdened. Information gathered during our FFY19 Annual Action Plan Needs Hearing, showed households in the County struggling with excessive credit card debt used for everyday living expenses, many of these clients have a 75% housing cost burden. This trend is not limited to the working population but also to many senior citizens who are on fixed incomes. Many Howard County residents that receive services are single-female-headed households and are forced to work multiple jobs just to make ends meet. Annual rent increases impact the household's stability, and over time makes a unit that was once affordable, unaffordable.

Coupling this housing scarcity is the fact that household incomes are not keeping pace with housing costs. The Consolidated Plan identifies, that lower-income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems. Being rent and mortgage overburdened can cause low-income residents to become unstable or face homelessness due to a one-time crisis, loss of income, or health issue.

CONCERN

The Con Plan identifies, using U.S. Census data; that lower income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems. The concern about rent and mortgage overburdened households is that low-income resident that experience rent or mortgage overburden become unstable and face homelessness with first-time crises, loss of income, or health issues.

AFFORDABILITY GAP CONTINUES

The FFY19 Annual Action Plan, the final year of our 4-year plan, awarded funding to projects that address the priorities identified through the County's Needs Hearing and citizen participation process. This process revealed that the County's current needs and priorities remain to be reflective of the broader issues received during the development of Howard County's FFY2016-2019 Consolidated Plan.

Through this application, Howard County is working to not only preserve the affordable housing stock through housing rehabilitation projects but is also increasing the availability of affordable permanent housing for persons with disabilities and facing homelessness. To encourage homeownership, Howard County is working with income eligible households by providing access to down payment and closing cost assistance.

To address the complex issues contributing to homelessness in the County the activities submitted provide a multi-faceted network of programs and support services that prevent homelessness as often and as soon as possible by coordinating care for homeless individuals and families, ultimately assisting them in becoming self-sufficient.

POPULATIONS/HOUSEHOLDS MOST AFFECTED

The Consolidated Plan identifies, based upon analysis of information provided by the U.S. Census data; lower income renter and owner households; elderly persons; frail elderly; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems.

BEING SUBMITTED TO HUD THROUGH THE 4th YEAR ACTION PLAN

FFY2019 CDBG ACTIVITIES BEING SUBMITTED TO HUD

1. **Roger Carter Recreation Center – $200,000.00** - Howard County invests annually under an acquisition by long-term lease arraignment for this public facility. The center is a key vehicle for neighborhood revitalization.
2. **Emergency Public Facility - $24,000.00** – Howard County invests annually under an acquisition by long-term lease arraignment of a public facility. This activity will ensure the safety of Howard County residents struggling with situations of domestic violence.
3. **Rebuilding Together – Homeowner Rehab - $174,173.30** - Rebuilding Together will use CDBG funding to provide free home repairs to income-eligible Howard County residents. The program was developed as a key tool in Howard County's toolbox to preserve affordable housing stock for income-eligible homeowners in the county.
4. **Route One Day Resource Center - $39,693.19 – Grassroots Crisis Intervention Center** will use CDBG funding for leasing and utility expenses associated with the day center. The center provides critical social and support services to both shelter and unsheltered homeless.
5. **Hope Works of Howard County – 34,528.43** – Hope Works will use CDBG funding to provide partial salary for the Transitional Housing Victims Advocate and partial utility payment for their transitional house. The program provides housing to Howard County residents that are made homeless due to sexual and intimate partner violence.
6. **The Community Action Council (CAC) – Housing Stability - $98,907.30** – CAC will use CDBG funding to provide housing stability services to income-eligible Howard County households. This activity will keep 63 households from becoming homeless over this program year.
7. **Bridges to Housing Stability – $249,090.18** – Bridges will use CDBG fund to acquire one housing unit to rent to persons working in Howard County earning between 30 % - 60% of the Howard County median income.
8. **Bridges to Housing Stability – $48,907.30** – Bridges will use CDBG funds to rehabilitate twelve (12) rental housing units they own in their Alliance Program portfolio in FFY19
9. **Living In Recovery (LIR) – Facilities Improvement - $24,028.71** – LIR will use CDBG funding for a roof replacement, bathroom renovations, regrade yard, install asphalt, reconfigure basement, and replace floor covering in one their sober living facilities.
10. **Help End Homelessness (HEH) – Facilities Improvement - $15,000.00** – Help End Homelessness will use CDBG funding to replace the failing HVAC system with a more energy efficient unit is one the units they own that houses a previously homeless Howard County family.
11. **The Arc of Howard County – Facilities Improvement - $98,907.30** – The Arc will use CDBG funding for the replacement of the failing roof on the facility that supports many activities and programs for persons with intellectual and developmental disabilities.
12. **Fair Housing Regional AI Coordinator - $6,400.00** – Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County in cooperation with these

jurisdictions contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which was formally accepted in February 2012. The AI Coordinator works to guide the implementation of the regional initiatives to address identified potential impediments to Fair Housing Choice. *This activity is funded out of the 20% Administration cap.*

13. **Office of Human Rights - Fair Housing Activity - $60,000.00** – the Howard County Office of Human Rights will use CDBG funding to conduct match paired testing of market rate unit in the County. This activity proposes to address several of the impediments to fair housing that were identified in the 2012 Analysis of Impediments to Fair Housing Choice (AI). *This activity is funded out of the 20% Administrative cap.*

14. **CDBG Admin. - $185,172.80** – Howard County will use CDBG funds towards the administration of the CDBG program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered.

    Howard County will use a portion of CDBG Admin funds to hire a consultant for the planning and writing of our FFY2020-FFY2024 Consolidated Plan / FFY20 Annual Action Plan.

    The Consolidated Plan is a strategy document designed to help the County to assess affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CDBG and HOME Programs

FFY2019 HOME PROGRAM ACTIVITIES BEING SUBMITTED TO HUD

1. **Ihomes CHDO Project - $200,000.00** – I-Homes Inc. will use HOME Program funds to to complete the design, develop, build of three single family dwelling units for persons with varying degrees of developmental and physical disabilities. Additionally, the funds will be gap funding for the acquisition of 3 existing condominium units to provide housing for extremely-low income persons with disabilities. I-Homes Inc. is certified as a Community Housing Development Corporation (CHDO).
2. **FFY2019 Future Affordable Housing Project – 90,779.92** – Howard County will allocate HOME Program funds for property acquisition, disposition, and rehabilitation in connection with the development of affordable housing unit. This includes but is not limited to the provision of rental housing, tenant-based rental assistance or homebuyer activities that will create affordable housing units and ultimately prevent and reduce instances of homelessness. *This activity will use $30,764.19 in Program Income as part of the funding.*

3. **Down Payment Assistance – $120,000.00** - Howard County Department of Housing and Community Development will provide down payment and /or closing cost assistance to

eligible homebuyers for the purchase of one dwelling unit in Howard County. Eligible awardees will meet the HUD program household income limits and attend homebuyer workshops offered in the County.

4. **HOME Admin - $49,137.60** – Howard County will use HOME funds towards the administration of the HOME program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered.

County Council of Howard County, Maryland

2019 Legislative Session Legislative Day No. 5

Resolution No. 48 -2019

Introduced by: The Chairperson at the request of the County Executive

A RESOLUTION adopting Howard County's Annual Action Plan for housing and community services to qualify for the receipt of federal Community Development Block Grant and Home Investment Partnership Program funds.

Introduced and read first time April 1, 2019.

By order Jessica Feldmark
Jessica Feldmark, Administrator

Read for a second time at a public hearing on April 22, 2019.

By order Jessica Feldmark
Jessica Feldmark, Administrator

This Resolution was read the third time and was Adopted ✓, Adopted with amendments ___, Failed ___, Withdrawn ___, by the County Council on May 6, 2019.

Certified By Jessica Feldmark
Jessica Feldmark, Administrator

NOTE: [[text in brackets]] indicates deletions from existing law; TEXT IN SMALL CAPITALS indicates additions to existing law; Strike-out indicates material deleted by amendment; Underlining indicates material added by amendment

WHEREAS, the Department of Housing and Urban Development ("HUD") has determined that Howard County qualifies as an Urban County and is eligible to receive funds under the Community Development Block Grant ("CDBG") and Home Investment Partnership Program ("HOME"); and

WHEREAS, the primary objective of HUD in awarding CDBG and HOME funds is to develop viable urban communities by providing funding and programs to ensure decent housing, suitable living environments, and expanded economic opportunities, principally for persons of low and moderate incomes; and

WHEREAS, in order to keep Howard County eligible to receive Entitlement Grants, the County Council approved a Consolidated Housing Plan by adopting Council Resolution No. 51-2016 on May 2, 2016; and

WHEREAS, in order to obtain the yearly entitlement of CDBG and HOME funds, the County must adopt an Annual Action Plan that implements the Strategic Plan as required under the Consolidated Housing Plan.

NOW, THEREFORE, BE IT RESOLVED by the County Council of Howard County, Maryland this 6th day of May, 2019 that it adopts the Howard County Annual Action Plan Federal Fiscal Year 2019 in substantially the form as attached hereto for purposes of qualifying for Community Development Block Grant and Home Investment Partnership Program funds.

1

FFY2019 AAP Needs Hearing # 5

APIL 22, 2019 – 7:00 PM

HOWARD COUNTY COUNCIL CHAMBERS

NO COMMENTS OR CONERNS RECEIVED

For more information about your Fair Housing rights and Housing discrimination, contact:

- Howard County Office of Human Rights
  Phone: (410) 313-6430
  (410) 313-0220 VOICE/RELAY
  https://www.howardcountymd.gov/Departments/County-Administration/Human-Rights

- Maryland Commission on Civil Rights
  Phone: (410) 767-8600
  Toll free: 1-800-637-6247
  VOICE/RELAY
  www.mccr.maryland.gov

- U.S. Department of Housing and Urban Development (HUD) Fair Housing Field Office:
  Baltimore, MD
  Phone: (410) 209-6640
  Fax: (410) 209-6673
  TTY: 1-800-877-8339
  www.hud.gov/offices/fheo/

The Office of Human Rights is a governmental agency that provides Fair Housing education and enforces the Fair Housing Law in Howard County.

Fair Housing Brochures In Other Languages

Please contact the Office of Human Rights for a brochure in Spanish, Korean, Chinese and Vietnamese.

Allan H. Kittleman, County Executive

Dr. Barbara J. Sands, Administrator

Howard County
Office of Human Rights
9820 Patuxent Woods Drive
Suite 237
Columbia, MD 21046
Phone: 410-313-6430
Fax: 410-313-6468
https://www.howardcountymd.gov/Departments/County-Administration/Human-Rights

Printed 8/13/18

Howard County
Office of Human Rights

Fair Housing is Your Right!

Fair Housing in Howard County

Grantee Unique Appendices

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

HOME INVESTMENT PARTNERSHIPS PROGRAM

POLICIES AND PROCEDURES

Kelly Cimino, Director of Housing and Community Development
Elizabeth Meadows, Community Planning and Grants, Chief
Nkechi M. Animashaun, HOME Program Specialist
Updated March 2018

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1. Introduction

This Policy and Procedures Manual establishes a framework for guiding the operation of the Howard County's Home Investment Partnership Fund (HOME) program. It provides an approach for making decisions and ensuring that the County's HOME program is operated in a fair and consistent manner. Lastly, the Policy and Procedures Manual provides information for program sub recipients in the management of their projects and how to achieve and maintain compliance with federal, state, and local requirements.

Disclaimer: The following policies were developed within the guidelines of the HOME regulations established by the Department of Housing and Urban Development (HUD) and may be revised at any time as necessitated to be in conformance with Federal regulations.

2. Background on HOME Investment Partnership Funds

The HOME Investment Partnership Program was created in 1990 through the Cranston-Gonzalez Affordable Housing Act. The sole purpose of this program is to create affordable housing for low-income individuals. HOME activities undertaken must accomplish at least one of two goals for low-income individuals; (1) Provide decent housing and/or (2) Provide suitable living environments. However, unlike CDBG, this program requires the participating jurisdiction to have a 25% match for each dollar awarded
HOME funding also strengthens the ability of state and local governments to provide housing and promotes public-private partnerships. The HOME program is administered through the U.S. Department of Housing and Urban Development (HUD), and Howard County receives funding as a Participating Jurisdiction (PJ).

Home Program Regulations are promulgated in the Code of Federal Regulations at 24 CFR Pt 92 with subparts A through M.

Sub Part K (24 CFR 92.500 - 92.509) explains general responsibilities of HOME grant administration including uniform administrative requirements, provisions of subrecipient agreements, program income, use of real property, record-keeping and reporting, and closeout procedures.

Sub Part H (24 CFR 92.350 - 92.358) details other HOME program requirements including affirmative marketing, environmental standards, displacement, relocation and acquisition, labor standards, lead-based paint, and conflicts of interest.

For any PJ to participate in entitlement programs, Howard County must develop a strategic five year plan known as the Consolidated Plan or "Con Plan". Community members along with stakeholders create this plan that provides local direction. The Consolidated Plan establishes community needs, goals and strategies, as well as identifying and prioritizing local objectives,

within the parameters of the national objectives for these entitlement programs. After approval by Council, the plan is submitted to HUD and becomes part of our contractual agreement to pursue stated objectives with funding priorities. The plan is renewed and resubmitted for approval every five years. The current Consolidated Plan dated 2016-2020 can be found at https://www.howardcountymd.gov/Departments/Housing/Community-Planning-and-Grants-Management

The County must also submit an annual Action Plan to HUD to formally request allocated program funds. The Action Plan includes a review of projects and organizations that the County has selected to fund for the following program year. In this plan, the County also describes how selected activities meet local objectives. Upon approval by the County Council, a grant agreement is executed between HUD and the County and funds become available for local distribution.

At the conclusion of a program year, the County is required by HUD to complete a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER outlines how funds from both CDBG and HOME were expended, including how the funds were used to meet the priorities, goals and objectives outlined in both the Consolidated and Annual Action Plans.

3. Federal Objectives

HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. HOME funds may be applied to a broad range of eligible activities such as providing home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; build or rehabilitate housing for rent or ownership; or for "other reasonable and necessary expenses related to the development of non-luxury housing," including site acquisition or improvement, demolition of dilapidated housing to make way for HOME-assisted development, and payment of relocation expenses. HOME funds may be applied to provide tenant-based rental assistance contracts of up to 2 years if such activity is consistent with an approved Consolidated Plan and justified under local market conditions.

FEDERAL OUTCOME CATEGORIES

Howard County is responsible to report on activities through the outcome and performance measurement system established by HUD. The system is designed to provide the opportunity for the federal government to collect information on outcomes funded with grant assistance, and thereby demonstrate program results.

The HUD system identifies three overarching objectives and three measurable outcomes. When a proposal is reviewed, staff will determine how the specific activities including intended results, benefits or objectives fall within the outcome parameters outlined by HUD. The intent when funding an activity determines which of the three objectives best describes the purpose of the activity. The three objectives include:

1. Suitable Living Environment: In general, this objective relates to activities that

are designed to benefit communities, families, or individuals by addressing issues in their living environment.

2. Decent Housing: The activities that typically would be found under this objective are designed to cover the wide range of housing possible under CDBG or HOME. This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort, since such programs would be more appropriately reported under Suitable Living Environment.
3. Economic Opportunities: This objective applies to the types of activities related to economic development, commercial revitalization, or job creation. This objective is only used in the CDBG program.

The three outcome categories are described:

1. Availability/Accessibility: This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low and very low income people where they live.
2. Affordability: This outcome category applies to activities that provide affordability in a variety of ways in the lives of low and moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
3. Sustainability - Promoting Livable or Viable Communities: This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

Each outcome category can be connected to one of the overarching objectives, producing nine result statements. Each proposed activity must intend to have one of the following results.

	Outcome 1: Availability or Accessibility	Outcome 2: Affordability	Outcome 3: Sustainability
Objective 1: Suitable Living Environment	Enhance Suitable Living Environment through Improved or New Accessibility	Enhance Suitable Living Environment through Improved or New Affordability	Enhance Suitable Living Environment through Improved or New Sustainability
Objective 2: Decent Housing	Create Decent Housing with Improved or New Availability	Create Decent Housing with Improved or New Affordability	Create Decent Housing With Improved or New Sustainability
Objective 3: Economic Opportunities	Provide Economic Opportunity through Improved or New Accessibility	Provide Economic Opportunity through Improved or New Affordability	Provide Economic Opportunity through Improved or New Sustainability

CPD Performance Measurement Guidebook July 7, 2006 Exhibit 2-1: Link between Objectives, Outcomes and Outcome Statements

4. Overview of HOME Program in Howard County

Howard County is responsible for executing all program activities in compliance with its adopted policies and procedures, as well as applicable state, federal, and local regulations. Howard County is responsible for general oversight of the program which includes the allocation of resources, policy development/oversight, and community relations issues associated with the programs.

HUD published a Final Rule in the Federal Register on July 24, 2013 to amend the HOME Program regulations. These amendments to the HOME regulations represent the most significant changes to the HOME Program in 17 years. This document is amended to reflect the changes made to the HOME Program rule.

This includes actions such as:
1) Implementing eligibility criteria;
2) Processing and approving project applications;
3) Preparing work orders and bid documents (if applicable);
4) Oversight of work and conducting progress inspections during construction;
5) Preparing security documents including mortgages and notes, and servicing recoverable grants where appropriate;
6) Preparing and executing subordination agreements for property owners who continue to meet the subordination requirements of the housing programs;
7) Preparing and executing affordability agreements, contractor/owner/municipality agreements, covenants and other agreements.

These guidelines may be amended based upon any changes in federal, state, or local regulations or administrative requirements.

Howard County uses its HOME Program funds to meet its housing and community development needs, which are included in its 5-year Consolidated Plan. In the current Consolidated Plan, there are ten (10) goals and objectives which include housing rehabilitation, home ownership, operation support, housing, special needs housing, community facilities, public services, overall coordination, fair housing and prevention and housing; with the last five activities being funded by the Community Development Block Grant (CDBG) program.

Some of the types of projects that may be funded include:

- Rental housing development;
- Community Housing Development Organization (CHDO) projects;
- Homeowner Rehabilitation; and
- Homebuyer Assistance.

Howard County's Department of Housing and Community Development (DHCD) manages the HOME program for Howard County. Staff members of the Division of Community Planning and Grants Management, namely the HOME Program Specialist oversee all HOME processes described in this policy and procedure manual as well as the ongoing oversight and monitoring of the program as HOME-funded projects are executed.

5. Citizen Participation

Howard County has established a Citizen Participation Plan to provide opportunities for citizen involvement in the process of developing and implementing the Community Development Block Grant (CDBG) Program and the HOME Program.

The Citizen Participation Plan outlines when, where and how citizens can access information, review and comment on major community plans and comment on progress of funded activities under these programs.

6. Definitions

A. Con Plan - Consolidated Plan - A plan prepared in accordance with the requirements set forth in 24 CFR Part 91 which describes community needs, resources, priorities and proposed activities to be undertaken under certain HUD programs, including CDBG.

B. Contractors - A contractor is an entity paid with CDBG funds in return for a specific service (e.g., construction). Contractors must be selected through a competitive procurement process.

C. DOL – Department of Labor – The Federal department of the Unites States government that is responsible for labor regulations and requirements.

D. EEO – Equal Employment Opportunity – Laws and regulations that require CDBG recipients to provide equal opportunity to all individuals without regard to race, color, religion, age, familial status, disability, national origin, or sex in the administration of their programs.

E. Extremely Low Income – Under CDBG regulations, a household/family having an income equal to or less than the Section 8 Very Low Income limit (30 percent of the area median income) as established by HUD.

F. Fair Housing – Multiple laws and regulations applied to the CDBG program that prohibits a wide range of discriminatory practices and requires the CDBG program to be administered in a manner which affirmatively furthers fair housing.

G. Family – All persons living in a household who are related by birth, marriage, or adoption.

H. Grantee – See Recipient.

I. HOME-Home Investment Partnership Funds, The Federal entitlement program that provides funds to states and cities/counties to aid in the assistance of affordable housing.

J. Household – All the persons who occupy a housing unit. The occupants may be a single family, one person living along, two or more families living together, or any

groups of related or unrelated persons who share living arrangements.

K. HUD – The United States Department of Housing and Urban Development. HUD establishes the regulations and requirements for the CDBG program and exercises oversight responsibilities for the use of CDBG funds.

L. LMI – Low and Moderate Income - A household/family having an income equal to or less than, the Section 8 Low Income limit (80 percent of the area median) as established by HUD.

M. Local match – non-Federal funding provided by a community/recipient as a condition of award or use of HOME funds. The amount of local match amount is 25% for each HOME eligible activity receiving funding. The match can come from a variety of non-grant, cash sources.

N. Low income – Under HOME regulations, a household/family having an income equal to or less than the Section 8 Very Low Income limit (50 percent of the area median income) as established by HUD.

O. MBE/WBE – Minority Business Enterprise / Woman-owned Business Enterprise; Companies owned by minorities and/or women.

P. Moderate Income – Under CDBG regulations, a household/family having an income equal to or less than the Section 8 Low Income limit (80 percent of the area median), but greater than the Section 8 Very Low Income limit (50 percent of the area median) as established by HUD.

Q. National Objective – The three main goals of the CDBG program – benefit LMI individuals, prevent or eliminate slum/blight, or meeting a particular urgent need. All funds expended under the program must meet one of the three National Objectives.

R. OMB – Office of Management and Budget – The oversight agency for matters relating to financial management and audits. OMB requirements are issued in the form of "circulars."

S. Project Development – The Division within the West Virginia Development Office that processes requests for payments for CDBG funds and monitors financial aspects of program implementation and reviews audits.

T. Recipient – Eligible localities and agencies that receive and use HOME Program funds under the State of Howard County's HOME Program. Commonly referred to as "Grantee".

U. Regulations – The requirements developed and issued by the agency responsible for

specific programs and/or requirements. For the HOME Program, regulations are issued by HUD and are codified at 24 CFR Part 92.

V. RFP – Request for Payment – The formal process of requesting payment of HOME Program funds from Howard County's Department of Housing and Community Development. RFP can also refer to procuring a Request for Proposal.

W. Section 3 – The Housing and Urban Development Act of 1968, as amended in 1992, that requires employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low and very low income persons; particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons.

X. Statute/Statutory – Requirements that have their basis in laws passed by Congress. For CDBG, the statute is Title 1 of the Housing and Community Development Act of 1974. Statutory provisions cannot be waived by HUD except in cases of natural disaster and must be amended or approved by Congress.

Y. Sub-recipient – Sub-recipients are government or private nonprofit organizations chosen by the Grantee to undertake certain eligible HOME activities. Sub-recipients may also be referred to as sub-Grantees.

Z. URA – Uniform Relocation Act – A Federal regulation governing the acquisition of real property and the relocation or displacement of persons from federally-assisted projects.

AA. Very Low Income – Under HOME Program regulations, a household/family having an income equal to or less than the Section 8 Low Income limit and that does not exceed 50 percent of the area median income.

BB. ABA – Architectural Barriers Act of 1968

CC. ADA – Americans with Disabilities Act

DD. AFFH – Affirmatively Furthering Fair Housing

EE. AI – Analysis of Impediments to Fair Housing

FF. CAPER – Consolidated Annual Performance Evaluation Report

GG. CFR – Code of Federal Regulations

HH. PI – Program Income

II. PJ – participating Jurisdiction (in the HOME program)

JJ. Title VIII – Title VIII of the Civil Rights Act of 1968 (also known as the Fair Housing Act)

KK. URA – Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

LL. WBE – Woman-owned Business Enterprise

7. Project Review, Application Process and Project Selection

Howard County's program year begins July 01 and runs through June 30 of the following year. A Public Notice is published in the local newspapers and on the County's website around December of each year announcing the anticipated available funding and notifying nonprofits of the application process for the upcoming program year. However, funding amounts are announced and estimated based on the anticipated federal budget. The actual amounts are typically provided from HUD prior to when Howard County begins writing the Annual Action Plan. Adjustments are made to award amounts to reflect the correct formula allocation for the upcoming program year. Consideration of funding amounts will be made on a case by case basis in keeping with the intent of the requirements of the HOME Program and available funding.

Annual Project Application Process

All HOME Program Funds are allocated based on the review and recommendations pertaining to applications submitted to the County through a yearly funding process.

Funding provided by the process will be awarded for the upcoming fiscal year (July 1- June 30). However, no contracts/agreements for funding can be executed until DHCD has executed funding agreements with HUD, which may be as late as September of the program year.

This is a competitive application process for limited funding; therefore, applications that meet all criteria are not guaranteed an award of funds and successful applications may be funded for less than the amount requested. Funding requests may be adjusted based on underwriting, subsidy layering reviews, the County's determination of the financial gap, proven market-based demand and economic growth.

Applications may be submitted during the course of the program year if no applications were received as part of the yearly funding process.

Application Process

Applications are made available in January for the next fiscal year allocations. The applications are due in February. Applications are submitted through the DHCD staff located at 6751 Columbia Gateway Drive, Columbia MD 21046 where they are date and time stamped.

Agencies that are currently receiving County CDBG funds, who are also applying for HOME funds, must be in compliance with all terms of their current agreement(s) and must not have any outstanding audit findings, monitoring findings or concerns as determined by the County.

DHCD may adjust funding requests based on underwriting, subsidy layering review, revised determination of the financial gap, revised evaluation of the DHCD proportionate, share proven market-based demands and economic growth.

No work on the project may begin nor can HOME Program funds be released until the environmental review process has been completed in accordance with the provisions of the National Environmental Policy Act of 1969 and the related authorities listed in HUD's Regulations at 24 CFR Parts 50 and 58. Ifa development site is purchased or under a purchase agreement prior to or during the funding round, the purchase must not be subject to the receipt of DHCD funding.

The applicant may be ineligible to be considered for funding if, in DHCD's discretion, the applicant has demonstrated an untimely use of previously awarded HOME funds. The applicant shall not exclude any organization or individual from participation under any program funded in whole or in part by HOME Program funds on the grounds of age, disability, race, creed, color, national original, familial status, religion or sex. No applicant, clients or contractors that have been suspended or debarred under HOME (debarred list at http://epls.arnet.gov) or any other federal program may receive HOME funds.

Project Selection

Applications submitted will be reviewed by Howard County Housing staff that may elect to use a committee of reviewers, to ensure that all aspects of potential HOME projects are evaluated from a multidisciplinary perspective. Recommendations on which projects to fund will be based on review and ranking of the projects and on the availability of HOME funds.

Incomplete applications or projects that cannot meet these requirements will not be considered for HOME funding. Instead, these applications will be withdrawn from

consideration, and the applicant will be notified of areas of improvement needed in their application so that it may be resubmitted in the future if so desired by the applicant.

For any project to be considered for CHDO set-aside funding, whether the CHDO is the owner with one or more individuals, a corporation, a partnership or other legal entity, the CHDO MUST be the managing general partner with effective decision making control.

PROJECT APPROVAL

Once staff has completed the review and ranking, projects will be conditionally funded and applicants notified. A public hearing on the conditionally funded projects will be held in April. The general public, project beneficiaries and project applicants will be afforded the opportunity to speak on the recommended project list. Once the County Council approves the County's Annual Action Plan, all awards will then be considered final and formal.

POST AWARD REQUIREMENTS

Projects and programs awarded funding must:

- Enter into a funding agreement within 24 months;
- Begin to expend funds within 12 months of executing a funding agreement;
- Expend all funds within 24 months of allocation;
- Complete relocation surveys, if applicable, within 90 days of obtaining site control, if the previous owner denies access to complete this activity, then the surveys must be completed within 90 days of assuming management control; and
- Must not conduct any activity at the project site until the HUD required environmental review has been completed.

8. Scoring of Grant Applications

- Each application is reviewed by staff for completeness; ensuring that all requested supportive documents are submitted.
- The application review is completed by a grant review committee (GRC) composed of Howard County employees. The GRC members score each application, and discuss with the Grants staff.
- The applications are scored and then prioritized and provided to the Director of the Department who then presents to the County Council for approval.

9. Funding Priority

Funding priority will be given to projects that;

- Provide rental units for persons at or below sixty percent of the area median income and for projects that have five (5) or more HOME units, at least twenty percent should be occupied by individuals or families who have gross annual incomes that are fifty percent or less of the area median income;
- Projects that help end homelessness;
- Meet the strategic plan objectives provided in the Consolidated Plan;
- Have adequate community support, and support an identified community need;
- Maximize the use of outside funds, match and services which are coordinated with other public and private efforts;
- Established means for program evaluation and accomplishment tracking;
- Are clearly defined as to scope, location, need, budget, goals;
- Demonstrate the applicant has the capacity and the capability to carry out the project successfully;
- Connection with employment in the community; and
- Can begin immediately and finish within the contracted time.

10. HOME Agreements

Howard County will initiate a HOME Agreement and other supporting documents based on the nature of the activity. Agreements are typically not signed until late August or September except in the case of acquisition activities. In the latter, the HOME Agreement is signed after the proposed property has successfully satisfied the requirements of an environmental review. Any expenditures or work initiated prior to receiving a signed copy of the Agreement will not be

approved.

11. Eligible Activities

Eligible costs depend on the HOME activity. HOME funds may be used for acquisition, new construction or rehabilitation of affordable rental housing. The 2013 HOME Rule adds language to paragraph 92.205(a)(1)to clarify that activities and costs are eligible for HOME funding only if the housing meets the property standards in 92.251 upon project completion. The developers or owners of the rental housing may be small-scale property owners, for-profit developers, nonprofit housing providers, CHDOs, the unit of local government, redevelopment organizations or a public housing agency such as the Howard County Housing Commission. DHCD staff only considers projects for HOME funds that are pursuing eligible activities. DHCD staff provides HOME funding only for eligible HOME rental housing costs which include hard (construction, rehabilitation) and soft costs (fees, insurance, appraisals) as detailed below:
All eligible uses of HOME funds are described in 24 CFR 92.206.

Hard Costs

- Acquisition of land (for a specific project which will begin within 12 months of project commitment) and existing structures;
- Site preparation or improvement, including demolition;
- Costs to make utility connections;
- Securing buildings; and
- Construction materials and labor

Soft Costs

- Financing or Surety fees;
- Credit reports;
- Title binders and insurance;
- Recordation fees, transactions taxes;
- Legal and accounting fees, including cost certification;
- Appraisals;
- Architectural/engineering fees, including specifications and job progress inspections;
- Environmental reviews and release of funds which are directly related to the project;
- Builders' or developers' fees;
- Affirmative marketing, initial leasing and marketing costs; and
- Operating deficit reserves (up to 18 months) – see specifics below.

Relocation Costs

- Payment for replacement housing, moving costs and out-of-pocket expenses;

- Advisory services; and
- Staff and overhead related to relocation assistance and services

Operating deficit reserve

This reserve is meant to meet any shortfall in project income during the project rent-up period and cannot exceed 18 months. The reserve can be used only for project operating expenses, scheduled payments to replacement reserves and debt service. Reserves remaining at the end of 18 months may be retained for reserves in the project at the Department's discretion. The disposition of any remaining funds at the end of the 18-month period must

Note on Related Soft Costs: Reasonable and necessary cost incurred by the owner or Howard County, the PJ, associated with the financing, or development (or both) of new construction, rehabilitation or acquisition of housing assisted with HOME funds. These costs include but are not limited to:

- Architectural, engineering, or related professional services required to prepare plans, drawings, specifications, or work write-ups. The costs may be paid if they were incurred not more than 24 month before the date that HOME funds are committed to the project and the participating jurisdiction expressly permits HOME funds to be used to pay the costs in the written agreement committing the funds.

- Costs to process and settle the financing for a project, such as private lender origination fees, credit reports, fees for title evidence, fees for recordation and filing of legal documents, building permits, attorney fees, private appraisal fees and fees for an independent cost estimate, builders or developers fees.

- Cost of a project audit, including certification of costs performed by a certified public accountant, that the Howard County may require with respect to the development of the project.

- Cost to provide information services such as affirmative marketing and fair housing information to prospective homeowners and tenants as required by 92.351.

- For new construction or rehabilitation, the cost of funding an initial operating deficit reserve, which is a reserve to meet any shortfall in project income during the period of project rent-up (not to exceed 18 months) and which may only be used to pay project expenses, schedule payments to a replacement reserve, and debt services. Any HOME funds placed in an operating deficit reserve that remain unexpended after the period of project rent-up may be retained for project reserves if permitted by Howard County, the participating jurisdiction.

- Staff and overhead costs of Howard County directly related to carrying out the project, such as work specifications preparation, loan processing inspections,

and other services related to assisting potential owners, tenants, and homebuyers, e.g., housing counseling, may be charged to project costs only if the project is funded and the individual becomes the owner or tenant of the HOME-assisted project. For multi-unit projects, such costs must be allocated among HOME-assisted units in a reasonable manner and documented. Although these costs may be charged as project costs, these costs (except housing counseling) cannot be charged to or paid by low-income families.

- For both new construction and rehabilitation, costs for the payment of impact fees that are charged for all projects within a jurisdiction.

- Costs of environmental review and release of funds in accordance with 24 CFR part 58 which are directly related to the project.

12. Ineligible Activities

HOME funds may not be used to provide a project reserve account (except as allowed in section 92.206(d) (5) of the regulations) or operating subsidies; tenant based rental assistance with an existing Section 8 program; non-federal matching contributions for other federal programs; annual contributions to the operations of public housing; and other prohibitions as outlined in section 92.214 of the HOME regulations. The County will not use HOME funds for any of these activities.

Activities that do not satisfy the statutory requirements of the HOME program rule will not be considered and will be deemed ineligible. At least ninety percent of all units created should be created for persons at or below sixty percent of the area median income and for projects that have more than five (5) HOME units, at least twenty percent should be occupied by individuals or families who have gross annual incomes that are fifty percent or less of area median income.

13. HOME Program - Subsidy Layering

SUBSIDY LIMITS

Each project funded with HOME must be evaluated to ensure that no more HOME funds are invested in the project than are necessary to provide affordable housing. The County prefers to fund projects that are successfully leveraging various funding sources. Before committing funds, if a project has multiple funding sources, an evaluation must be made to ensure that the HOME funds, in combination with other governmental funds, do not exceed what is necessary to provide affordable housing. This is generally referred to as the "subsidy layering review." Howard County must conduct a subsidy layering review prior to the award of any funds. DHCD staff will evaluate the reasonableness and need for the requested assistance by analyzing pro-formas,

showing the full length of affordability period, for cash flow, debt –coverage ratios, and the appropriateness of fees charges with and without the HOME funds.

Forms of Subsidy

HOME allows virtually any form of financial assistance to be provided for eligible projects and to eligible beneficiaries. The County will determine what forms of assistance it will provide. Some forms of assistance will require legal instruments for implementation. HOME regulations list the following forms of assistance as eligible:

- Interest or non-interest bearing loans or advances: These loans are amortizing loans, with or without accruing interest. Repayment is expected on a regular basis so that over a fixed period of time all of the principal and interest is repaid. The term of the loan may vary and the property or some other assets are used as collateral.

- Deferred Loans (forgivable or repayable): These loans are not fully amortized. Instead, some, or even all, principal and interest payments are deferred until some point in the future. Deferred loans can be structured in a variety of ways and terms may differ greatly. Deferred payment loans use the property or some other form of collateral as security for repayment.

- Grants: Grants are provided with no requirement or expectation of repayment. They require no liens on the property or other assets.

- Interest Subsidies: This is usually an up-front discounted payment to a private lender in exchange for a lower interest rate on a loan.

- Equity Investments: An investment made in return for a share of ownership. Under this form of subsidy, the PJ acquires a financial stake in the assisted property and is paid a monetary return on the investment if money is left after expenses and loans are paid.

- Loan Guarantees and Loan Guarantee Accounts: HOME funds may be pledged to guarantee loans or to capitalize a loan guarantee account. A loan guarantee or loan guarantees account ensures payment of a loan in case of a default.

Minimum Amount of HOME Assistance

The minimum amount of HOME assistance that must be invested in a project involving rental housing or a homeownership project is $1,000 times the number of HOME-assisted units in the project. The minimum amount does not apply to tenant based rental assistance.

Maximum Per Unit Subsidy

The maximum per unit HOME varies by metropolitan area and is based on Section 234 Mortgage limits. Each year, HUD calculates these maximum amounts by area. Current subsidy limits may be obtained by contacting the HUD Baltimore CPD (Community Planning and Development) Representative or CPD Director. Under the regulation, the maximum limit relates to the HOME funds; but DHCD staff will also utilize the subsidy limit to evaluate the number of units required in the project based upon the total HOME funding in the project.

Allocating Costs

Before determining the allowable HOME subsidy amount, DHCD staff will establish the total HOME-eligible costs for the project. HOME funds may be used to assist one or more housing units in a multi-unit project. Only the actual HOME eligible development costs of the assisted units may be charged to the HOME program. If the assisted and non-assisted units are not comparable, the actual costs may be determined based on a method of cost allocation. If the assisted and non-assisted units are comparable in terms of size, features and number of bedrooms, the actual cost of the HOME- assisted units can be determined by pro-rating the total HOME eligible development costs of the project so that the proportion of the total development costs charged to the HOME program does not exceed the proportion of the HOME-assisted units in the project. Costs included in the budget are used for allocating costs. Since floating units, by definition, must be comparable, costs should always be pro-rated if HOME units float.

Project Evaluation

Before the County invests HOME funds in a project, it will assess if other governmental assistance that has been, or is likely to be made available to the project. In performing this evaluation, the County will consider the aggregate amount of assistance from HUD and other sources that is necessary to insure the project's feasibility. T he analysis includes:

- Project budget with all expenses
- Sources and Uses
- Property information
- Review of tax credit application, awards and syndication costs
- Eligible costs
- Developer fees
- Operating expenses
- Vacancy rates
- Debt ratio
- Performa

14. Environmental Review

As part of the contract preparation process, the County will conduct an environmental review under the National Environmental Policy Act (NEPA). No funds will be formally committed nor expended until the completion of the NEPA.

To expedite the process, the County proceeds with the required environmental review and information gathering prior to the Agreement being signed. The sub recipient may be required to furnish data, information and assistance as part of the environmental review.

Completion of the environmental review process is mandatory, before taking any choice-limiting actions, including the expenditure or commitment of either federal or non-federal funds.
Prohibited actions include any physical action on a site such as demolition, movement, rehabilitation, conversion, repair or construction. Further the agency may not execute a construction contract prior to environmental clearance.

15. Acquisition with Relocation

Federal law regarding acquisition and relocation is complex and involves an extensive series of notifications and actions within prescribed timelines. Rigorous documentation and recordkeeping standards are also outlined. Therefore, an agency considering such action must contact the County prior to any choice-limiting actions. Choice-limiting actions include, but are not limited to the expenditure or commitment of either federal or non-federal funds, or execution of any contract. Howard County's staff will work closely with any applicant pursuing such a project.

For more information see:

Federal Register /Vol. 73, No. 142 /Wednesday, July 23, 2008 /Notices 42895
Section 104(d) of the Housing and Community Development Act of 1974, as amended
Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

24 CFR	42	Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs
24 CFR	92.353	Displacement, Relocation, and Acquisition

24 CFR	570.606	Displacement, Relocation, Acquisition, and Replacement of Housing
49 CFR	24	Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs
42 USC	Chapter 44	Sec. 3537 (c) Prohibition of Lump-sum Payments

16. LEVERAGING OTHER FUNDS

Howard County encourages the leveraging of funds from both public and private resources to finance projects. HOME Program funds are used as gap funding. Further, the County will work with applicants to assist in applying for all available funds and leveraging other resources to implement the housing strategies and programs.

Applicants must document funding commitments and leverage sources. In addition, applicants must disclose other funding requested and the status of that request. All funds necessary for the development of a project must be committed within 12 months of this award. The County will not execute documents until all funding commitments are confirmed.

17. HOME Program- Matched Resources

The HOME program requires participating jurisdictions to have a match of at least 25%. Sources of match can be cash, donated land or real property, infrastructures improvements, bonds issued by state or local government, donated materials, equipment, or professional services, sweat equity, and the value of foregone taxes.

18. HOME Program – Resale/Recapture

Howard County administers the federal HOME program which establishes a funding mechanism to assist low income persons achieve homeownership. The HOME Loan and Regulatory agreements will contain a recapture clause.

The County may demand payment in full for any of the following reasons. The specific criteria is detailed in the deed and note attached to the property.

- Change of use of the property;
- Transfer of all or any part of the property or interest in the property;

- Homebuyer does not maintain principal residency; and
- Failure to uphold the affordability period.

19. Loan Terms

Howard County Department of Housing and Community Development (DHCD) provides assistance to rental projects as grants or loans with specific terms and restrictions incorporated on a project-by-project basis. Below is an outline of the types of loans awarded by the County.

- The loan shall be secured by a Promissory Note and/or Deed of Trust;
- Loan terms are finalized at time of project negotiation; and
- Loan amounts are based on project budget and capacity for debt.

Loan Servicing and Delinquent Payments

Howard County's Finance Department (finance) services all loans. Finance informs HOME staff of any delinquent payments, when applicable. County staff will work with property owner regarding rectifying any delinquency. If necessary, legal remedies will be pursued.

Deferred Payment Loans

These loans are available to borrowers who are utilizing the Settlement and Down payment Loan Program (SDLP) and have a household income of less than 80% of area median income. There are no pre-payment penalties. The Deferred Payment Loan is due and payable when one or more of the following occurs:

- A change in property ownership,
- Refinance; and
- Termination of owner occupancy.

Please note: If an application for a loan is denied, the applicant must wait one year from the date of denial before submitting another application for the Housing Rehabilitation Program.

Forgivable Loans/ Non-Profit Agency Loans

These loans can be forgiven or deferred for a period of time if the borrower is in compliance with the terms and conditions of the loan. This type of loan is typically used with non-profit organizations that create affordable housing projects. Loans are negotiated at time of contract with general terms are generally at 1-3% with a 5-20 year amortization. Repayments are always expected on income producing properties.

20. Period of Affordability

HOME-assisted units must meet affordability requirements as required by the HOME regulations. Affordability periods begin with the completion of the project and affordability requirements apply regardless of the term of the project's loan, mortgage or transfer of ownership. Affordability requirements will be imposed by deed restrictions, covenants running with the land, or other mechanism approved by HUD. The affordability period is the length of time during which the HOME requirements apply to a HOME-assisted property. The affordability period can be 5, 10, 15, or 20 years, depending on the type of HOME project and the average per unit HOME investment.

The affordability period will be determined by the amount of funds invested in a project. DHCD has the right to require a minimum affordability period beyond that required by HUD. The affordability period should be thought of as the "compliance period." Throughout the period of affordability the owner must enforce funding requirements. Howard County DHCD will monitor to ensure compliance.

HOME affordability periods are minimum requirements. DHCD may, at its sole discretion, establish longer terms of affordability. The affordability period for each project is clearly defamed in each HOME written agreement.

The HOME Rule does allow for termination of affordability restrictions upon foreclosure or transfer in lieu of foreclosure as a means to encourage lenders to participate in the HOME program. However, Howard County must repay the U.S. Department of Housing and Urban Development if HOME-assisted housing fails to meet the affordability requirements for the full affordability period without regard to the term of any loan or mortgage or the transfer of ownership, even in the event of foreclosure, transfer in lieu of foreclose or assignment to the U.S. Department of Housing and Urban Development. Therefore, the Department will require grantees to repay DHCD the full amount of the HOME funds drawn for projects where affordability requirements are not met in full.

DHCD typically uses a regulatory agreement and/or a deed of trust which are recorded to enforce rent and occupancy agreements. Covenants and deed restrictions may be suspended upon transfer by foreclosure or deed-in-lieu of foreclosure.

Amount of HOME funds	Affordability Period
Under $15,000	5 years
$15,000-$40,000	10 years
Over $40,000	15 years

AFFORDABLE RENTAL HOUSING

- The rental property owner must comply with the HOME requirements, including rent limits, tenant income limits, tenant lease protections, affirmative marketing, and property standards;
- Affordability requirements apply without regard to the term of any mortgage or loan, or transfer of ownership;
- Throughout the period of affordability, income eligible households must occupy the assisted units;
- When designated rental units become vacant during the period of affordability, subsequent tenants must be income eligible and must be charged the applicable rent.

AFFORDABLE HOMEOWNERSHIP HOUSING

As defined by HOME regulations, affordable housing for homeownership is single-family housing that is a 1- to 4-unit residence, a condominium unit, a cooperative unit, a combination of manufactured home and lot, or a manufactured home lot. HOME-assisted homeownership housing must meet a period of affordability based on the amount of HOME funds invested in the project. The minimum periods of affordability per unit are as shown in the table below:

If the homeowner does not maintain principal occupancy during the entire affordability period, Howard County will recapture the federal funds associated with the unit. Howard County must ensure that 100% of all HOME funds made available during a program year that are invested in homeownership projects benefit households defined as low- income by HUD.

21. HOME Program- Tenant Leases

DHCD's HOME Program Specialist reviews each project's lease and tenant selection plan to ensure HOME compliance. Any agency, non-profit or sub recipient receiving HOME Program funds must enact specific tenant protections; some of which are outlined below.

Leases must be for not less than one year, unless by mutual agreement between the tenant and the owner. The Department will review the lease term on a case by case basis.

Leases may not contain any of the following provisions enumerated at 24 CFR 92.253:

1. Agreement by the tenant to be sued, to admit guilt, or to a judgment in favor of the owner

in a lawsuit brought in connection with the lease;

2. Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties. However, the owner may dispose of personal property left by a tenant in accordance with state law;
3. Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent;
4. Agreement of the tenant that the owner may institute a lawsuit without notice to the tenant;
5. Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties;
6. Agreement by the tenant to waive any right to a trial by jury;
7. Agreement by the tenant to waive the tenant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease; and
8. Agreement by the tenant to pay attorney's fees or other legal costs even if the tenant wins in a court proceeding by the owner against the tenant. The tenant, however, may be obligated to pay costs if the tenant loses.

LEASE TERMINATION POLICIES

An owner may not terminate or refuse to renew the lease except for the following reasons:

- Serious or repeated violation of the terms and conditions of the lease;
- Violation of applicable federal, state, or local law;
- Completion of the tenancy period for transitional housing; and
- Good cause.

To terminate or refuse to renew tenancy, the owner must serve written notice specifying the grounds for the action at least 30 days before the termination of tenancy.

TENANT SELECTION POLICIES

An owner of rental housing must adopt written tenant selection policies and criteria that:

- Are consistent with the purpose of providing housing for very low-income and low- income families;
- Are reasonably related to program eligibility and the applicants' ability to perform the obligations of the lease;
- Provide for the selection of tenants from a written waiting list in the chronological

order of their application, insofar as is practicable; and

- Give prompt written notification to any rejected applicant of the grounds for any rejection.
- Are consistent with the purpose of providing housing for very low-income and low-income families.
- Are reasonably related to program eligibility and the applicants' ability to perform the obligations of the lease.
- Provide for the selection of tenants from a written waiting list in the chronological order of their application, insofar as is practicable.
- Give prompt written notification to any rejected applicant of the grounds for any rejection.

22. Tenant Based Rental Assistance (TBRA)

Tenant based rental assistance is a rental subsidy that can be used to help individual households afford housing costs such as rent and security deposits. TBRA may also assist tenants with utility deposits, but only when HOME Program funds are also used for rental assistance or security deposits.

For each HOME allocation, 90% of the occupants of HOME assisted rental units and households assisted with HOME funded TBRA must have incomes that are 60% or less of the area median. TBRA programs require annual re-certification of income.

For TBRA programs, source documentation is required for initial and all subsequent income verifications. For rental projects, the requirement for annual income re-certification can be fulfilled with tenant self- certification. Self-certification must include a statement that provides the family's annual income and family size, along with a certification that the information is complete and accurate. The certification must state that the family will provide source documents upon request. Income must be verified with source documentation every fifth year.

23. Rental Housing Policies

General Program Rules

Before any funds are released, an agreement will be signed between DHCD and the recipient. The agreement will satisfy Federal requirements and establishes the terms under which the funding is being provided. Funds will not be released until a funding agreement is executed.

Funding Agreements will establish a minimum affordability period that is typically not less than 5 years and will at minimum meet the HOME guidelines for new construction. DHCD wants to ensure a permanent stock of affordable housing and may require longer affordability periods than is required by HUD regulations.

Project funding will be limited to the amount necessary to facilitate completion of the project and will not exceed a proportionate share of costs in a project with floating units. All costs must be in direct relation to DHCD assisted units and supporting documentation of all expenditures is required for all costs being paid for with the DHCD funding. With the exception of acquisition and financing costs, DHCD funds are available as reimbursement for eligible expenses. Documentation must be provided for any cost reimbursement.

Eligible Property Types

HOME rental projects may be one or more buildings on a single site, or multiple sites that are under common ownership, management and financing. The project must be assisted with HOME funds as a single undertaking. The project includes all activities associated with the site or building.

HOME funds may be used to assist mixed-income projects (but, only HOME-eligible tenants may occupy HOME-assisted units). Transitional as well as permanent housing projects, including group homes and Single Room Occupancy (SRO) projects, are allowed. There are no preferences for project or unit size or style. For group homes, the rent for the project is based on the number of bedrooms in the project which is then split (pro-rata) share between tenants.

Properties previously financed with HOME during the affordability period cannot receive additional HOME assistance unless assistance is provided during the first year after project completion. HOME funds may not be used for operations or modernization of public housing projects financed under the Housing Act of 1937. DHCD will not fund these ineligible property types.

Determining HOME-Assisted Units

The HOME Program distinguishes between the units in a project that have been assisted with HOME funds and those that have not been assisted. This distinction between HOME-assisted and unassisted units allows HOME funds to be spent on mixed-income projects while still targeting HOME dollars only to income-eligible households. HOME may only pay actual costs of HOME-assisted housing. The HOME rent and occupancy rules apply only to HOME-assisted units. In general this designation will be based on the actual HOME investment in a unit or project. The number of HOME-assisted units in a project must be specified in the

HOME Loan Agreement or Regulatory Agreement. HOME rules create a floor for the number of HOME-assisted units a project must have which is based on the proportional share of total eligible costs to be paid with HOME funds. Howard County DHCD may require a higher number of HOME-assisted units in a project. Some projects may consist of only HOME-assisted units.

Fixed and Floating Units

For properties with both assisted and non-assisted units, DHCD specifies in the HOME Agreement whether the units are "fixed" or "floating". This designation cannot be changed after the initial contract has been executed.

a) Fixed

When HOME-assisted units are "fixed," the specific units that are HOME-assisted (and, therefore, subject to HOME rent and occupancy requirements) are designated and never change. Designating fixed units allows the project to have a composition of HOME-assisted units by unit size (number of bedrooms) that varies from the composition of non-HOME assisted units by unit size (number of bedrooms). In other words, a project with two three-bedroom units and three four- bedroom units could "fix" one three-bedroom unit and one four-bedroom units as HOME-assisted.

b) Floating

When HOME-assisted units are "floating," the units that are designated as HOME-assisted may change over time as long as the total number of HOME- assisted units in the project remains constant. HOME-assisted floating units must represent the same percentage of all comparable unit sizes in the project. In other words, a project with two three-bedroom units and four four-bedroom units could "float" one three-bedroom unit and two four-bedroom units (thus "floating" fifty percent of each unit size in the project.

The floating designation gives the owner some flexibility in assigning units, and can help avoid stigmatizing the HOME-assisted units. If the floating designation is used, the owner must ensure that the HOME-assisted units remain comparable to the non-assisted units over the affordability period in terms of size, features and number of bedrooms.

Maximum Purchase Price

Housing purchased with HOME funds must be modest housing as defined by HUD in the HOME Program regulations. In the case of acquisition of newly constructed housing or existing housing, the housing must have a purchase price for the particular type of single-family housing to be purchased that does not exceed 95% of the median purchase prices for the area. Howard County will ascribe to the maximum purchase price as established from HUD's for the Baltimore-Towson MSA as follows:

- When HOME funds are used to build or to acquire newly constructed housing or standard housing for homeownership, the housing must have a purchase price for the type of single family housing that does not exceed 95 percent of the median purchase price for the area. [92.254(a)(2)(i)]
- When HOME funds are used to acquire housing with rehabilitation for homeownership, the housing must have an estimated property value after rehabilitation that does not exceed 95 percent of the median purchase price for the area. [92.254(a)(2)(ii)]

- When HOME funds are used to rehabilitate housing which is currently owned by a family, the housing must have an estimated property value after rehabilitation that does not exceed 95 percent of the median purchase price for the area. [92.254(b)(1)]

Note: Every homebuyer must receive homeowner housing counseling.

24. Financial Management

Howard County requires all subrecipients to comply with the requirements and standards of OMB Circular 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles and Audit Requirements", as applicable. These principles shall be applied for all costs incurred whether charged on a direct or indirect basis. Additionally, as part of these requirements all subrecipients must conduct annual audits.

DHCD operates on a fiscal year of July 1through June 30. Planning for each fiscal year begins the previous January with requests for proposals released and due in February. Funds are estimated to be available after July 1st, with the understanding that no contracts/agreements can be executed until DHCD has executed funding agreements with HUD, which could be as late as September of the fiscal year.

25. Administration and Monitoring

AMENDING DOCUMENTS

HOME loan agreements are fully executed between the County and the project prior to a project's set- up in IDIS and any HOME funds being disbursed. Loan agreements may be amended by mutual agreement of the parties for changes in terms, for the receipt of additional funds, or changes in project scope. However, agreements will be automatically

amended if so required to ensure compliance with regulations.

OTHER DOCUMENTS

Other types of documents may be executed as conditions of funding and may include mortgage and loan agreements, deed restrictions and other use agreements between Howard County and the owner, property management agreements between the owner and property manager, and asset management agreements between the owner and asset manager.

Examples include:

- Mortgage and loan documents are signed at closing and contain the financial terms and conditions of the loan;
- Deed restrictions and other use agreements will be used to place specific restrictions on the property; and
- Property management agreements detail the specific responsibilities of the property manager.

Copies of management agreements executed assigning the management responsibility of DHCD funded projects must be provided to DHCD prior to the release of retention or within 15 days of execution, whichever is later.

MONITORING

The development process will be monitored by DHCD staff through the draw process, including reviewing draw or reimbursement requests, cost estimates, construction contracts and construction documents. PJs must also conduct construction progress and final inspections to ensure that the work is done appropriately.

The initial monitoring, completed upon lease-up, includes reviewing 100 percent of client files and inspecting 15 to 20 percent of assisted units.
During the affordability period the project will be inspected and monitored annually for compliance with funding requirements, which will include a review of management processes, a file review, and a physical inspection of the property and assisted units. HOME During the affordability period all assisted units must be in compliance with rent and income limits DHCD requires that agencies submit a Rental Housing Project Compliance Report annually until the end of the project's affordability period, submit an annual certification that the project and its units are suitable for occupancy,and submit rents for approval.

Also, annually, the PJ must examine the financial condition of HOME-assisted rental projects with 10 or more HOME-assisted units to determine the continued financial viability of the project.
After the HUD-required affordability period ends, the Federal HOME requirements no longer apply.

HOME properties will be monitored in according to the total number of units in a project as follows:

Number of Units	Inspection Required	Units Inspected
1 to 4	Every 3 years	100%
5-25	Every 2 years	20% or 4 HOME units minimum
26 or more	Annually	20% or4 HOME units minimum

Note: DHCD reserves the right to inspect the properties more frequently than the HOME rule requires

Grantees are expected to keep adequate records to document and demonstrate compliance of all requirements including:

- The project is Affirmatively Marketed to qualified applicants; Plan must be in place and reviewed;
- Tenants are screened for eligibility;
- Rent and occupancy targets are observed;
- Adequate property maintenance is conducted; and
- Proper internal controls and financial management

26. Community Housing Development Organizations (CHDOs)

A Community Housing Development Organization (CHDO) is a private non-profit, community-based service organization that has obtained or intends to obtain staff with the capacity to develop manage and/or sponsor affordable housing. Further information on the regulations regarding CHDOs, can be found in the Code of Federal Regulations Title 24 at Part 92.300.

Regulatory Requirements for CHDO Certification

In order to receive HOME funding under CHDO guidelines, an organization must:

- Submit a complete application with up to date supporting documentation to the County for every project that the CHDO seeks funding for;
- Receive certification approval from the County;
- Demonstrate a history of serving the community and have a clearly defined geographic service area;
- Document that at least one-third of its governing board is composed of residents of low-income neighborhoods or elected representative of low-income neighborhood organizations;
- Organized under State/Local Law: The nonprofit organization must show their articles of incorporation as evidence of being organized under state and local law;

- IRS Nonprofit Status: Organizations must have a 501(c) (3) non-profit status of exemption letter of certification from the Internal Revenue Service (IRS);
- Purpose of Affordable Housing: Providing decent and affordable housing must be the organization's primary purpose as evidenced by the organization's Charter, Articles of Incorporation, By-laws or a Resolution of the CHDO's board of directors;
- Service Area: The organization's service area must be Howard County or a smaller area within Howard County and this must be in its Articles of Incorporation and/or By-laws; a map of the service area must be attached to the organization's CHDO application;
- Board Representation: The board of directors must contain no more than 1/3 representation from the public sector and a minimum of 1/3 representation from the low- income community it serves;
- For-Profit Sponsorship: CHDOs may be sponsored by for-profits; however, the CHDO cannot be controlled by the for-profit and must be free to contract for goods and services. The primary purpose of the for-profit cannot be housing ownership/management as evidenced by the for-profit's Articles of Incorporation. For profit organizations and/or their appointees can only make up 1/3 of the board of directors, but they cannot serve as officers or employees of the CHDO (2013 Rule).
- If sponsored by a religious organization, the CHDO must be a separate secular entity from the religious organization, with membership available to all persons, regardless of religion or membership criteria, as evidenced by by-laws, charter, or articles of incorporation;
- Low-Income Input: A formal process that is described in the By-laws or Resolutions has been established and implemented for low-income program beneficiaries from the organization's service area to advise the organization in all of its decisions regarding affordable housing projects;
- Serving the Community: A minimum of one year of relative experience serving the community where the organization intends to develop affordable housing must be demonstrated. This must be demonstrated via letters of community support and a narrative description of the organization's community activities;
- Accounting Standards: The organization must meet and adhere to financial accountability standards found in 24 CFR 84.21;
- Organizations having revenues in excess of $300,000 MUST submit an audit performed by a Certified Public Accountant, along with their most recently filed IRS Form 990. Organizations having income less than $300,000 MUST submit the most recently filed IRS Form 990; and
- Benefit No Individual: No part of the CHDO's profits may benefit any members, founders, contributors, or individuals. This requirement must be in the Articles of Incorporation.

CAPACITY AND EXPERIENCE

To qualify as a CHDO, the 2013 Rule requires that a nonprofit have paid employees with housing experience appropriate to the role the nonprofit expects to play in projects (i.e.,

developer, sponsor, or owner) in order to receive a CHDO designation.

Note: the definition of "owner" has been significantly revised in the 2013 Rule at 92.300. The Rule now permits a CHDO to own and operate housing that it does not develop. Therefore, a nonprofit that will undertake development activities must demonstrate development capacity. A nonprofit that will undertake property ownership and management must demonstrate ownership/management experience.

The requirement for development capacity can no longer be demonstrated through the use of consultants with development experience, except during the first year of operation as a CHDO, provided that the consultant trains the CHDO staff.

In addition, the capacity requirements cannot be met through the use of volunteers of staff that is donated by another organization. Consultants or volunteers can continue to fill occasional skill gaps or undertake activities that are required only on a periodic basis (e.g., project underwriting), but cannot be the basis of a determination that a nonprofit has the capacity to be designated as a CHDO.

Per HOME regulations funding is set aside for CHDO use as follows:

- 15 percent of total HOME funding allocation is reserved for CHDOs to develop, sponsor or own housing (Up to 10 percent of this 15percent may be used for project specific assistance; see additional information at Title 24 Section 92.301); and
- Up to 5 percent of the total HOME funding allocation can be used directly for operating expenses for a CHDO per fiscal year, contingent upon the CHDO entering an agreement to use HOME funds to develop, sponsor or own housing within 24 months.

HOWARD COUNTY REQUIREMENTS FOR CHDO CERTIFICATION

In addition to the regulatory requirements from HUD, Howard County has established additional criteria for CHDO certification. The organization must:

- Maintain a record of good standing with the Maryland Secretary of State's Department of Assessment and Taxation Office
- Maintain no history of awarded CHDO funding being de-obligated or significant compliance findings on its Howard County funded projects.

The criterion above is not all-inclusive and Howard County may require additional information prior to determining CHDO certification. Meeting the above requirements does not guarantee CHDO certification and/or CHDO funding. Howard County reserves the right to deny or revoke CHDO certification based on its evaluation of the organization's performance.

PROJECT DEVELOPMENT USING CHDO SET-ASIDE

A certified CHDO must be an owner, developer or sponsor of a HOME-eligible project to use CHDO set-aside funds. A CHDO may serve in one of these roles or in a combination of roles, such as being owner and developer.

OWNER OF RENTAL HOUSING

The CHDO is required to own (in fee simple absolute or long-term ground lease) multifamily or single family housing that is rented to low-income families. The CHDO must own the HOME project during development and throughout the period of affordability, and is required to oversee all aspects of the development process. At a minimum, the CHDO can own the property and hire a project manager or contract with a development contractor to oversee all aspects of the development.

Under the 2013 Rule at 92.300(a)(2), a CHDO is also permitted to acquire housing that is in standard condition provided it owns the housing throughout the affordability period.

- This new definition facilitates participation of community-based nonprofit organizations that have the capacity to own and operate affordable rental housing in their community, but do not have the capacity to develop such housing; and
- Consequently, this new definition creates additional opportunities for nonprofits organizations to access the CHDO set-aside funds to address their neighborhoods' affordable housing needs.

DEVELOPER OF RENTAL HOUSING

A CHDO that is a "developer" of rental housing is the owner (in fee simple absolute or long-term ground lease) and developer of the project and must be in sole charge of all aspects of the development process, including obtaining zoning, securing non-- HOME funds, selecting contractors, overseeing the progress of work, and determining reasonableness of costs. The CHDO must own the HOME-assisted housing during the development process and throughout the period of affordability.
This is a change from the pre-2013 Rule in that the CHDO must own the property; it no longer has the option to be under contract with an owner to develop the property.

SPONSOR OF RENTAL HOUSING

The 2013 Rule provides two definitions of a "sponsor" of HOME-assisted rental housing:

- 92.300(a)(4) clarifies the requirements for CHDOs to maintain effective project control when acting as "sponsor" of rental housing. A CHDO "sponsors" rental housing when the property is "owned" or "developed" by:
  a. A subsidiary of the CHDO (in which case the subsidiary, which may be a for-profit or nonprofit organization, must be wholly owned by the CHDO);

b. A limited partnership (in which the CHDO or its wholly owned subsidiary must be the sole general partner); or
c. A limited liability company (in which the CHDO or its wholly owned subsidiary must be the sole managing member).

If the limited partnership or limited liability company agreement permits the CHDO to be removed as sole general partner or sole managing member, respectively, the agreement must require that the removal be "for cause" and that the CHDO must be replaced by another CHDO. In addition, HOME funds must be provided to the entity that owns the project.

92.300(a)(5) codifies the pre-2013 Rule definition of "sponsor." It states that a CHDO also "sponsors" HOME-assisted rental housing in situations in which the CHDO owns and develops the housing and agrees to convey the housing to a private nonprofit organization (that does not need to be a CHDO but cannot be created by a governmental entity) at a predetermined time after completion of the project development.

- Such arrangements typically occur when a CHDO has development expertise and the nonprofit organization has the capacity to own and operate the housing.
- The CHDO is required to own the property before the development phase of the project and is required to select the nonprofit organization before entering into an agreement with the PJ that commits HOME funds to the project.
- The nonprofit organization assumes the CHDO's HOME obligation (including any repayment of loans) for the project.
- If the property is not transferred to the nonprofit organization, the CHDO sponsor remains liable for the HOME assistance and the HOME project.

DEVELOPER OF HOUSING FOR HOMEOWNERSHIP

For HOME-assisted homebuyer projects, the housing is "developed" by the CHDO if it is the owner (in fee simple absolute) and developer of new housing that will be constructed or existing substandard housing that is owned or will be acquired by the CHDO and rehabilitated for sale to low-income families in accordance with Part 92.254.

- To be the "developer," the CHDO must arrange financing for the project and be in sole charge of construction. As part of its set-aside funds, the CHDO can provide direct down payment assistance to a buyer of the housing it has developed with HOME funds in an amount not to exceed 10 percent of the amount of HOME development funds. In this role, the CHDO is not a subrecipient.

Note: Every homebuyer must receive homeowner housing counseling.

SET-ASIDE REQUIREMENT FOR CHDOS

Within 24 months after the date that HUD notifies the participating jurisdiction of HUD's execution of the HOME Investment Partnerships Agreement, the participating jurisdiction must reserve not less than 15 percent of the HOME allocation for investment only in housing to be owned, developed or sponsored by community housing development organizations.

- Howard County must certify the organization meets the definition of a "community housing development organization" and must document that the organization has capacity to own, develop, or sponsor housing each time it commits funds to the organization.
- Note on reserving: Funds are allowed to be committed, or reserved, when Howard County has a fully executed written agreement with the CHDO (or project owner as described paragraph 92.300(a)(4) of this section) committing the funds to a specific local project in accordance with
- paragraph (2) of the definition of "commitment" in § 92.2.

Agreement Requirements

- The written agreement between Howard County and the CHDO must state the actual sales price of the housing or describe the method that will used to determine the sales price
- The written agreement must state whether the proceeds of the sale must be returned to the County, retained by the CHDO, and whether the proceeds must be used for HOME-eligible activities or other housing activities in accordance with 92.503.

Note: Funds that are recaptured during the period of affordability because housing no longer meets the affordability requirement under 92.254(a)(5)(ii) must be reinvested in HOME-assisted activities in accordance with Part 92.503.

Eligible and Ineligible Uses of CHDO Set-Aside Funds

A. CHDO acting as owner, sponsor or developer may use the 15 percent CHDO set-aside for the following activities:

- Acquisition and/or rehabilitation of rental or homebuyer property;
- New construction of rental or homebuyer property; and
- Direct financial assistance to homebuyers of HOME-assisted property developed or sponsored by the CHDO.

CHDO set-aside HOME funds must be used during the construction or rehabilitation of the property.

B. Ineligible CHDO Activities - Ineligible uses of the HOME CHDO set-aside are homeowner rehabilitation, tenant-based rental assistance (TBRA), and down payment and/or closing cost assistance to purchasers of housing not developed with HOME CHDO funds.

C. Operating Assistance – Howard County may choose to use up to 5 percent of its annual HOME allocation to provide funds for CHDO operating assistance. This allocation does not count toward the 15 percent set-aside funds used by CHDOs for projects. To be eligible for CHDO operating assistance, the CHDO must submit a funding application for a CHDO-eligible project and the funding must be available. Howard County is not required to provide operating assistance.

LIMITATIONS ON CHDO OPERATING FUNDS:

CHDO operating assistance may not exceed $50,000 each fiscal year, or fifty percent (50%) of CHDO's total annual operating expenses for that year, whichever is greater.

Operating funds are provided on a year-by-year basis provided funds are available and the organization has acceptable performance in the community. A certified copy of the CHDO's most recent operating budget must be submitted to Howard County to determine amount of assistance.

Howard County reserves the right to delay payment of operating funds if it is evident that the CHDO project is experiencing delays. Howard County reserved the right to reduce the amount of or not award operating assistance based on its evaluation of the CHDO's production and/or overall performance.

Eligible operating expenses (must be reasonable and necessary) are:

- Salaries, wages, benefits, and other employee compensation;
- Employee education, training and travel
- Rent and utilities;
- Communication costs;
- Taxes and insurance; and
- Equipment, materials, and supplies.

REPORTING REQUIREMENT

Howard County will periodically evaluate the performance of any CHDO wishing to receive CHDO operating funds. When receiving operating funds, monthly performance reports are required. The reports must include information about the following:

- A report on the community involvement and participation in the CHDO with regard to beneficiaries of the projects as well as partner organizations and other entities involved in serving low-and moderate-income households; and

- A description of what the receipt of the CHDO operating funds has enabled the CHDO to accomplish that would otherwise have been unable to achieve and a detailed narrative of specific uses of the CHDO operating funds.

Technical Assistance Available to CHDOs

Staff members are available to assist CHDOs in structuring project proposals to best meet program requirements as well as to assist CHDOs in implementing these projects once they are funded.

Nonprofits (including CHDOs) may also be eligible to receive technical assistance from other organizations including:

- Training and Development Association;
- Maryland Department of Housing and Community Development; and
- HUD Baltimore Field Office.

27. Other Federal Requirements

For all HUD programs, there are many other requirements that must be met in addition to the specific HOME program requirements. Those who receive HOME funds must comply with these requirements. The description and checklist of other federal requirements below is not all-inclusive. Applicants should refer to the HOME regulations for a complete list of other federal requirements.

Non-Discrimination and Equal Access Rules / Fair Housing and Equal Opportunity

Yes, must affirmatively further Fair Housing. Particular attention should be paid to signs of discrimination in leasing practices.

Regulatory Citations & References:

- 92.202 and 92.250
- Title VI of Civil Rights Act of 1964 (42 U. S. C. 2000d et. seq.)
- Fair Housing Act (42 U. S. C. 3601-3620)
- Executive Order 11063 (amended by Executive Order 12259)
- Age Discrimination Act of 1975, as amended (42 U. S. C. 6101) o 24 CFR 5.105(a)

Affirmative Marketing and Minority Outreach

All rental or homebuyer projects with HOME assisted housing units must adopt

affirmative marketing procedures and requirements. Howard County has adopted and follows affirmative marketing procedures and requires all our subrecipients and property owners to follow as well.

Agreement Requirement - all written agreements with subrecipients; and owners, developers, or sponsors, in accordance with §92.504(c), must include the affirmative marketing requirements.

With the 2013 HOME Rule, §92.351 was revised to extend the applicability of affirmative marketing procedures to all HOME-funded programs, including TBRA and down-payment assistance programs. The pre-2013 affirmative marketing requirements were applicable only to HOME-assisted projects with five or more HOME units.

- The previous exception to the affirmative marketing requirements for tenants receiving Section 8 rental assistance has been eliminated.
- The specific affirmative marketing procedures to be used will depend on the type and size of the program or project. For instance, a PJ administering a down-payment assistance program must affirmatively market the program (i.e., the availability of federal funds for down-payment assistance), rather than units available for purchase.

Regulatory Citations & References: Section 92.351

Projects with Tenant Preferences

The HOME 2013 Rule further modified the requirements to specify that to the extent that a project is implementing tenant preferences, the PJ must have affirmative marketing procedures that apply in the context of limited/preferred tenant selection policies.

For example, a project for homeless persons must be marketed to the universe of persons who would meet the preference. The project could not rely solely on referrals from a specific homeless provider when there are other homeless providers with potential applicants in the market area.

Owners of Rental Property

Howard County Department of Housing and Community Development mandates the owner of the rental property with HOME assisted units must adopt an affirmative marketing policy and procedure acceptable to the County to ensure that eligible persons regardless of race, color, national origin, sex, religion, and familial status are adequately informed of the services they provide as described in 24 CFR 92.351 (a). The Rental Property Owner's adopted Plan must be approved by DHCD staff and by HUD's Fair Housing Program Center.

Affirmative marketing procedures must include the following elements:

- Methods for informing the public, owners and potential tenants about fair housing laws

and the grantee's policies (for example: use the Fair Housing logo or equal opportunity language).

- A description of what owners and/or the grantee will do to affirmatively market housing assisted with HOME funds, and maintenance of records that document the actions taken in this marketing effort.
- A description of persons not likely to apply for housing without special outreach and on what basis the owners and/or the grantee made this determination.
- A description of what owners and/or the grantee will do to inform persons not likely to apply for housing without special outreach, and maintenance of records that document the actions taken in this marketing effort.
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met, and maintenance of records that document an assessment of the effectiveness of the marketing effort.

ACCESSIBILITY

Regulatory Citations & References:

- Section 504 of the Rehabilitation Act of 1973 (implemented at 24 CFR Part 8)
- For multi-family buildings only, 24 CFR 100.205 (implements Fair Housing Act)

EMPLOYMENT AND CONTRACTING RULES

Equal Opportunity Employment -Yes, contracts and subcontracts for more than $10,000 must include language prohibiting discrimination.

Regulatory Citations & References:

- Executive Order 11246 (implemented at 41 CFR Part 60)

SECTION 3 ECONOMIC OPPORTUNITY

Federal regulations require that to the greatest extent possible the benefits of federal financial assistance will be directed to very low- and low-income persons, particularly those who are recipients of government assistance for housing and to business concerns which provide economic opportunities to very low- and low-income persons. However, Section 3 only applies to new employees hired as a result of the federal assistance. If a contractor or subcontractor performs the work with existing employees, Section 3 requirements do not apply to the contract. Contracts and subcontracts funded in whole or in part by HUD resources where the individual contract or subcontract exceeds $100,000 and the amount of the HUD assistance for the project exceeds $200,000 are subject to Section 3 requirements. Both dollar thresholds must be present to trigger Section 3. Contracts exclusively for supplies or materials are excluded unless the

contract includes installation of the materials.

SECTION 3 ACTIVITIES INCLUDE:

- Housing rehabilitation, including reduction and abatement of lead-based paint projects; housing construction; and
- Other public construction assisted with housing or community development funds.
- HUD has established goals and actions to be taken in awarding contracts to Section 3 businesses
- 10 percent of the total dollar amount in contract for building trades work arising in connection with housing rehabilitation and housing construction;
- 3 percent of the total dollar amount of all other Section 3 covered contracts;
- Notify Section 3 businesses of the contracting opportunities covered by these requirements;
- Notify all potential contractors of the Section 3 covered contracting requirements, and include the Section 3 clause in all contracts;
- Assist and "actively" cooperate with HUD in obtaining contractor/subcontractor compliance with Section 3 requirements;
- Refuse to award a contract to any contractor who has been found to have violated the Section 3 regulations;
- Take remedial action against contractors who fail to comply with the Section 3 requirements (e.g. termination); and
- Document actions (including results and impediments) taken to comply with Section 3 requirements.

Projects will have to report to DHCD on how they are meeting Section 3 requirements.

MINORITY/WOMEN EMPLOYMENT

Howard County Housing has adopted the MBE/WBE language of Howard County when related to HOME Rental Program. The Owner of the HOME assisted Rental Property will follow the specific Procurement Guidelines and Procedures related to MBE and WBE beginning on page 73 of the County Manual.

Regulatory Citations & References:

- Executive Orders 11625, 12432 and 12138
- 24 CFR 85.36(e)

DAVIS-BACON

Yes, if construction contract includes 12 or more units that are HOME-assisted.

Regulatory Citations & References:

- 92.354 Davis-Bacon Act (40 U. S. C. 276a -276a-5) o 24 CFR Part 70 (volunteers)

- Copeland Anti-Kickback Act (40 U. S. C. 276c)

Conflict of Interest

The conflict of interest provisions at §92.356(f)(1) prohibit certain persons from occupying HOME-assisted housing. This provision has been revised with the 2013 HOME Rule to clarify that immediate family members of an officer, employee, agent, elected or appointed official or consultant of an owner, developer, or sponsor are prohibited from occupying a HOME-assisted affordable housing unit in a project. This amendment further clarifies that the restriction on occupancy applies during the period of affordability only, and not to the entire period of ownership by the entity that received the HOME assistance.

Regulatory Citations & References:

- 24 CFR 92.356
- 24 CFR 85.36
- 24 CFR 84.42

Debarred Contractors

DHCD staff ensures that no contractor working on a HOME project is debarred, suspended, or ineligible per the requirements of 24 CFR part 24. If the amount of assistance exceeds $200,000 OR contract or subcontract exceeds $100,000.

Regulatory Citations & References:

- Section 3 of the Housing and Urban Development Act of 1968 (implemented at 24 CFR Part 135)

Yes, check HUD's list of debarred contractors.

Regulatory Citations &

References: 24 CFR Part 5

Environmental Reviews

Projects funded with HOME must examine the environmental impacts of each activity as required by the National Environmental Policy Act of 1969 (NEPA) and other environmental requirements. The cost of the environmental assessment is an eligible project-related soft cost and may be paid for with HOME funds. A full explanation of the NEPA requirements can be found in the HOME regulations in section 92.352. DHCD will ensure environmental reviews are completed prior to commitment of HOME funds.

Regulatory Citations & References:

- 24 CFR 92.352
- 24 CFR Part 58.35 b(5)
- National Environmental Policy Act (NEPA) of 1969

Flood Insurance

Yes, must obtain flood insurance if located in a FEMA designated 100-year flood plain. Community must be participating in FEMA's flood insurance program.

Regulatory Citations & References:

- Section 202 of the Flood Disaster Protection Act of 1973 (42 U. S. C. 4106)
-

Site and Neighborhood Standards

- Yes, for new construction only.
  - Regulatory Citations & References: 24 CFR 893.6(b)

Lead-Based Paint

Housing that is purchased, rehabilitated or assisted in some way with HOME is subject to the Lead-based Paint Poisoning Prevention Act, the Residential Lead-based Paint Hazard Reduction Act and the implementing regulations for these Acts. HUD maintains a website for the Office of Healthy Homes and Lead Hazard Control where lead-based paint requirements are described as they apply to HUD programs.

Applicants for HOME funds should discuss acquisition projects where units that are older than 1978 are being purchased with DHCD prior to purchase. Lead paint was used in all residential paints prior to 1978. Testing for lead, an assessment of its presence, and a plan for stabilization or removal will be required if HOME funds are used to acquire pre-1978 units. Requirements differ depending on whether rehabilitation work is performed. Rehabilitation notices to owners. Paint testing of surfaces to be disturbed. Risk assessment, if applicable, based on level of rehabilitation assistance. Appropriate level hazard reduction activity (based on level of rehabilitation assistance). Safe work practices and clearance. Provisions included in all contracts and subcontracts.

Regulatory Citations & References:

- 92.355
- Lead Based Paint Poisoning Prevention Act of 1971 (42 U. S. C. 4821 et. seq.)
- 24 CFR Part 35
- 982.401(j) (except paragraph 982.401G)(l)(i))

WHAT MUST BE DONE

1. The rules require that a disclosure to all applicants and tenants about any known or potential lead-based paint hazards must be issued; and
2. Documentation of the issuance of the EPA/HUD/Consumer Product Safety Commissions brochure "Protect Your Family from Lead in your Home", and
3. Get a signed copy of the certification of accuracy completed at each initial lease up.

Note: For any HOME projects involving existing housing/rehabilitation, DHCD will ensure the proper disclosures are provided to applicants and tenants regarding lead-based paint

RELOCATION

It is important that those who receive HOME funds from the County take appropriate steps to minimize the displacement of families, individuals, businesses, nonprofit organizations and farms as a result of the activity being funded with HOME. The requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) guide the steps that must be taken to minimize displacement and the actions taken to compensate those who are displaced by a federally-funded project.

The applicant must fully describe any project activity that may lead to voluntary or involuntary displacement of persons impacted by the proposed project in an application for HOME funding. A timeline for notification of persons who may be impacted is of vital importance and those applying for HOME funds should take no steps that may result in a person relocating involuntarily prior to discussing their application with the County. All required steps must be determined by consulting the Uniform Relocation Act (URA) which can be found in section 92.353 of the HOME regulations.

For voluntary purchases of property, the applicable disclosure must be submitted with an application for funding for any HOME project where the purchase of land is involved. These disclosures must be retyped on the applicant agency's letterhead.

Displacement must be minimized; existing tenants must be provided a reasonable opportunity to lease a dwelling unit in the building upon completion of the project. Reimbursement for temporary relocation, including moving costs and increase in monthly rent/utilities, must be provided, as well as advisory services.
Regulatory Citations & References: 92.353

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U. S. C. 4201-4655)
- 49 CFR Part 24

- 24 CFR Part 42 (subpart B)
- Section 104(d) "Barney Frank Amendments"

Uniform Administrative Requirements

Nonprofit agencies who receive HOME funds are subject to OMB Circular No. A-122, which guides the determination of cost reasonableness, allocation of costs to grant funds, direct vs. indirect costs, allowable costs, etc. Nonprofit agencies must follow Circular A-122 when making decisions about eligible and ineligible costs that can be assigned to grant awards.
The requirements of OMB Circular A-87 and following requirements of 24 CFR part 85 apply to the participating jurisdiction receiving HOME funds: 85. 6, 85.12, 85.20, 85.22, 85.26-85.34, 85.36, 85.44, 85.51, and 85.

Audits

Nonprofit agencies that receive federal funds are subject to the audit requirements imposed by OMB Circular A-133 for nonprofit organizations. However, a nonprofit must expend $300,000 or more in federal funds before Circular A-133 requirements apply. After December 31, 2004, the expenditure threshold increases to $500,000. Circulars A-122 and A-133 are available from the Whitehouse website at www.whitehouse .gov/omb/circulars/index.html .

Procurement

Nonprofits that receive federal funds must follow policies that dictate how goods and services are purchased with these funds. The federal regulations published at 24 CPR Part 84 establish the procedures that a nonprofit must follow. One of the most important aspects of the federal procurement regulations is that a nonprofit must have written procedures in place prior to beginning procurement with federal funds. How to develop these policies is described in sections 84.40-84.48. Howard County DHCD is available to assist nonprofits with the development of procurement policies and standards prior to their purchasing goods with federal funds.

Howard County Housing has adopted the Procurement Policy of Howard County when related to the HOME Rental Program. The Howard County Purchasing Manual will be referenced within the HOME Agreement under the Procurement section and attached as an Exhibit to all HOME Rental Grant Agreements. The Owner of the HOME Assisted Rental Property will follow the specific guidelines for all purchases and procurement.

Labor Standards

For all construction projects that meet established threshold requirements and use federal

funds for construction or rehabilitation of units, the project contractor must pay prevailing wages for the area to the trade employees working on the project. DHCD will provide wage determinations from the U.S. Department of Labor for inclusion in all bidding and contractual documents for construction and rehabilitation projects. For HOME projects, if 12 or more units will be developed, prevailing wages must be paid as required by the Davis-Bacon and related wage payment Acts.

28. Property Standards & Other Standards

Housing that is constructed or rehabilitated with HOME funds must meet all applicable local codes, rehabilitation standards, city codes and zoning ordinances at the time of project completion.

- Accessible Units – in HOME properties with 5 or more total units, the common spaces and a certain number of units must be constructed or rehabilitated to be accessible to persons with mobility and/or sensory impairments in accordance with the Section 504 Accessibility - Uniform Federal Accessibility Standard (UFAS). These units must be marketed to ensure that they offered first to persons with disabilities.

SEC. 3.100. - HOWARD COUNTY BUILDING CODE; ADOPTION OF INTERNATIONAL CODES.

(a) In General . Except as amended in sections 3.101, 3.102, 3.103, and 3.104 of this subtitle, the codes enumerated in this section are hereby adopted as the Howard County Building Code as if the codes were set out in full in this section.

(b)

Adopted Code:

(1)

The International Building Code, 2015 Edition, Published by the International Code Council, Inc.

(2)

The International Residential Code for One- and Two-Family Dwellings, 2015 Edition, published by the International Code Council, Inc.

(3)

The International Mechanical Code, 2015 Edition, published by the International Code Council, Inc.

(4)

The International Energy Conservation Code, 2015 Edition, published by the International Code Council, Inc.

(5)

The Life Safety Code, 2015 Edition, published by the National Fire Protection Association.

(6)

The Howard County Electrical Code, adopted pursuant to title 3, subtitle 2 of the Howard County Code.

(7)

The Plumbing and Gas fitting Code for Howard County adopted pursuant to title 3, subtitle 3 of the Howard County Code.

(8)

The Maryland State Accessibility Code.

(9)

The Howard County Sign Code, adopted pursuant to title 3, subtitle 5 of the Howard County Code.

(C.B. 10, 2015, § 1)

PROPERTIES THAT ARE REHABILITATED WITH HOME FUNDS MUST MEET THE FOLLOWING STANDARDS:

- DHCD's Rehabilitation Standards
- Handicapped accessibility requirements, where applicable.
- Also, one of the following:
  - Local and State Code Requirements
  - Uniform Physical Condition Standards (UCPS) – the UCPS are uniform standards established by HUD for housing that is decent, safe, sanitary, and in good repair per 24 CFR 5.703.

NEW CONSTRUCTION WITH THE USE OF HOME FUNDS MUST MEET THE FOLLOWING STANDARDS:

- Model Energy Code
- Handicapped accessibility requirements, where applicable.
- New construction of rental housing must meet site and neighborhood standards at 24CFR 9 83.6(b)
- Also, one of the following:
  - Local and State Code Requirements
  - International Code Council's International Residential Code
  - International Building Code

ACQUISITION OF EXISTING HOUSING (NO REHAB OR CONSTRUCTION) MUST MEET THE FOLLOWING STANDARDS:

- Applicable local housing quality standards and code requirements.
- Handicapped accessibility requirements, where applicable.
- Uniform Physical Condition Standards (UCPS) - **24 CFR Parts 5 and 200**

To ensure compliance with property and accessibility standards, DHCD development staff and HOME Program Specialist monitor each project during construction. They also review the project construction budget prior to funding the project to ensure that cost estimates are appropriate and review any change orders to ensure cost reasonableness and that HOME funds are only disbursed for eligible costs. In addition, DHCD development staff review work

write-ups and plans, prior to construction, in order to confirm they reflect all applicable property standards and codes.

Owners must maintain properties in accordance with property standards throughout the affordability period. DHCD will conduct periodic property inspections as determined by HOME regulations to insure continued compliance.

A. Occupancy Standards

In March, 1991, the Department of Housing and Urban Development (HUD) addressed the issue of occupancy standards in the Keating Memorandum, which states that "...HUD believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act." However, the HUD memorandum goes on to state that a "two people per bedroom" policy may be unreasonably restrictive, depending on other factors, such as the size and number of bedrooms, the overall size of the unit, and other special circumstances. For this reason, caution suggests that housing providers should consider the occupancy standard of two persons per bedroom plus one or more additional persons, depending on the household's circumstances.

Local code requirements mandate the following in reference to the designation of rooms as a bedroom:

Howard County Occupancy Limitations

Bedrooms – Every bedroom occupied by one person shall contain at least70 square feet of floor area, and every bedroom occupied by more than one person shall contain at least 50 square feet of floor area for each occupant thereof. Living Room – 3 to 5 occupants must have a minimum of 120 square feet, 6 or more occupants must have a minimum of 150 square feet. Dining Room – 3 to 5 occupants must have a minimum of 80 square feet, 6 or more occupants must have 200 square feet. Combined living room and dining room spaces - If the total area is equal to that required for separate rooms and if the space is located so as to function as a combination living/dining room. There are additional requirements for efficiency Apartment units whose maximum occupancy is 3 persons.

- A den with windows must be treated as a bedroom;
- You must have 70 sq. feet in the bedroom for the first person;
- You must have 50 sq. feet per person for any additional persons using the same room as a bedroom

The Local Code should be consulted for additional requirements.

B. Other Standards

The site and neighborhood standards (24 CFR 983.6(b)) apply only to new construction

of rental housing. DHCD development staff review each HOME project to ensure it meets the site and neighborhood standards prior to funding.

29. Annual Review and Rents and Income

Howard County will implement a four (4) step process to ensure that rents and income are reviewed annually. The first step would entail sending a reminder on January 01 or the closest work day thereafter to all property managers requesting that a rent and income report be submitted, along with the certification that all units are suitable for occupancy to Howard County Housing. The second step ensures that all reports will be obtained by the HOME Program Specialist no later than January 31st. The report should list the rents, income and family size for ALL HOME assisted units. The third step would entail the HOME Program Specialist reviewing the rents and income in accordance with HOME Program rental affordability requirements and completing checklist 6-D, Project Compliance Report: Rental Housing. A copy of checklist 6-D is attached for reference (Appendix E). Lastly, a copy of the checklist along with written correspondence and a summary of the review will be placed in the project file and a copy sent to each property manager.
Howard County Housing has also implemented an "Annual Review of Rents and Income" form (Appendix F) for each project file. After each step is completed, HCH staff must initial and upon completion of all four (4) steps, sign and date the form. This process will ensure that rent rolls are being reviewed and reported on annually, and ultimately keeping Howard County in compliance with 24CFR Pt 92.252.

30. Rental Units - Single Family Rental

HOME RENTS

The Home Program restricts the rents for HOME units and the incomes of the tenants in units throughout the affordability period. Every HOME-assisted unit is subject to rent limits designed to help make rents affordable to low income households. These maximum rents are referred to as "HOME Rents." Based on changes in area income levels or market conditions, HOME rents, as calculated by HUD and approved by DHCD, may increase. If a project can and wants to increase HOME rents, official requests must be submitted to Howard County and DHCD must approve prior to implementation.

Tenants must be given at least 30 days written notice before increases are implemented. Any increases are also subject to other provisions of the lease agreements. For example, rents may not increase until the tenant's lease expires.

HOME rents may decrease. While project rent levels are not required to decrease below

the HOME rent limits in effect at the time of project commitment, decreasing HOME rents may reflect a change in market conditions that may force owners to reduce rents in order to maintain tenants. DHCD with HUD's approval may permit adjustments to the rent structure if the financial feasibility of the project is threatened. This is important to lenders providing financing to HOME-assisted projects.

There are two HOME rents used in the HOME program:

- High HOME Rents: The maximum amount an owner can collect per month on a "High" HOME-assisted unit
- Low HOME Rents: The maximum amount an owner can collect per month on a "Low" HOME-assisted unit.

A. HOME Rent Limits

It is imperative that grantees understand HOME rent limits as they apply to their project.

DHCD utilizes HUD published Low and High HOME rents limits. HUD's calculation of Low and High HOME rents assumes the owner pays the utilities. If the tenant pays utilities, the maximum allowable rent that could be collected by the owner would be the applicable Low or High HOME rent minus a utility allowance. DHCD will approve utility allowances on a project by project basis based upon allowances prepared by local utility providers or based on HUD's Utility Schedule Model. The HOME rent limits restrict the maximum total rent (minus the utility allowance) that can be received by project owners regardless of the amount of rental assistance provided to a tenant.

Examples:

	1 Bedroom High HOME Unit		2 Bedroom High HOME Unit
$326	High HOME Rent Limit	$416	High HOME Rent Limit
-$70	Utility Allowance	-$90	Utility Allowance
$256	Maximum Rent Owner May Collect	$326	Maximum Rent Owner May Collect

	1 Bedroom Low HOME Unit		2 Bedroom Low HOME Unit
$326	Low HOME Rent Limit	$416	Low HOME Rent Limit
-$70	Utility Allowance	-$90	Utility Allowance
$256	Maximum Rent Owner May Collect	$326	Maximum Rent Owner May Collect

DHCD will inform grantees of updated HOME rent limits upon its receipt of new HUD-published limits (generally in the spring each year). However, tenants' rents should not be adjusted until the provider requests in writing approval from Howard County to increase the rents for the HOME-assisted units in their project. The County approves all rent increases. The increase occurs at the time their leases are renewed. The tenant must be given a 30-

day notice of rent increase.

Owners may not refuse to lease HOME-assisted units to a certificate or voucher holder under the Section 8 Program, or to a holder of a comparable document evidencing participation in a HOME tenant-based rental assistance (TBRA) program, because of the status of the prospective tenant as a holder of such certificate, voucher or comparable HOME TBRA document.

1. High HOME-Assisted Units
   DHCD will require all initial tenants of High HOME-assisted units to have incomes at or below 60% of the area median income. Subsequent tenants are restricted to the income as specified in the HOME Loan Agreement for the project. DHCD reserves the right to further restrict the income level for a project to achieve appropriate levels of project compliance when warranted.

2. Low HOME-Assisted Units
   DHCD will require all projects with five or more HOME-assisted units to designate at least 20 percent of the HOME-assisted units as Low HOME units. Tenants must have incomes at or below 50 percent of the area median income to occupy Low HOME-assisted units. DHCD, through the HOME Loan Agreement, may require more Low HOME-assisted units for a project than the HOME rules require.

   The rents collected by the owner on Low HOME-assisted units are restricted to the Low HOME rent limits less tenant paid utilities per an approved utility allowance. The only exception is for Low HOME units in a project that receives federal or state project-based rental subsidies and the tenant pays no more than 30% of their adjusted income for rent. The maximum rent may then be the rent allowable under the project-based subsidy program.

INCOME ELIGIBILITY REQUIREMENTS FOR GRANTEES

DHCD requires grantees to use the Part 5 Definition (also referred to as Section 8 Method), which calculates the gross family annual income minus any eligible exclusions for the upcoming year definition found at 24 CPR Part 5.609 to determine applicant income eligibility. Eligibility is based on anticipated or projected income during the next 12 months. A detailed explanation of the Annual (Gross) Income definition can also be found in the "Technical Guide for Determining Income and Allowances for the HOME Program."

The HOME Program allows grantees to use two forms of verification for the Annual (Gross) Income basis of determining income eligibility. These forms are third party verification and review of source documents. Source documents for at least two months

must be reviewed. All household members must be counted when calculating household income. When collecting income verification documentation, property owners (or managers) should also consider any likely changes in income.

A. Third Party Verification

Under third party verification, a third party (e.g. employer, Social Security Administration, or public assistance agency) is contacted to provide information. Written requests and responses are preferred. However, to clarify or complete missing information on a written response, conversations with a third party are acceptable if documented through a memorandum to the file that documents the contact person, information conveyed and date of call.

To conduct third party verifications, a grantee must obtain a written release from the household that authorizes the third party to release required information. If a third party is unwilling to provide the information or will not do so without charging a fee, the grantee may attempt to obtain the required source documentation through other documented means, such as the use of bank statements.

B. Timing of Income Determinations

Income determinations are to be completed before tenant occupancy of a HOME-assisted unit. If the income determination is more than six months old, a new determination will have to be conducted.

Annual Recertification of Income

Due to the HOME Program imposing occupancy restrictions over the length of the affordability period, owners must establish systems to recertify tenant income on an annual basis. Tenant income will be examined on the anniversary of the original income evaluation or at lease renewal. However, the owner may adopt an annual schedule and perform all verifications at the same time. DHCD will verify that tenant income recertification documentation is in the tenant files at the time of on-site inspections.

Although the final HOME rule allows two additional methods of income recertification, in addition to the method of collecting source documentation, DHCD will allow only source documentation and at its discretion, may permit a written statement from the administrator of another government program under which the family receives benefits, and that examines the annual (gross) income gross income of the family each year minus any exclusions the households have. The statement must also indicate the family size, or provide the current income limit for the program and a statement that the family's income does not exceed that limit. If the owner chooses to utilize the alternative method described, they will still be required to collect full source documentation every sixth year of the tenants

Increases in Tenant Income

A tenant's income is likely to change over time. **If** these changes occur during the affordability period, the project owner must take certain steps to maintain compliance with HOME rent and occupancy requirements.

- The project must maintain the correct number of High and Low HOME rent units.
- Rents must be adjusted for tenants whose incomes rise above 80 percent of the area median income.
- Owners of projects assisted with HOME and Low Income Housing Tax Credits must comply with the specific requirements associated with combining these funding sources.

KEEPING THE CORRECT NUMBER OF HIGH AND LOW HOME RENT UNITS

The owner should take the following steps to maintain the correct numbers of High and Low HOME rent units.

If the income of a tenant occupying a Low HOME rent unit increases, but does not exceed 80 percent of area median income, that unit becomes a High HOME rent unit. To replace the Low HOME rent unit, the owner must rent the next available comparable unit (for "floating" unit projects) or HOME-assisted unit (for "fixed" unit projects) to a very-low- income tenant (income at or below 50% of the area median income). Subject to the terms of the lease, the rent of the tenant whose income has increased may be increased to the High HOME rent for the unit. This process should not increase the number of assisted units.

If a tenant's income increases above 80 percent of the area median income, the unit occupied by the tenant is still considered to be a HOME unit, but the tenant's rent must be adjusted as described below.

A. Adjusting Rent for Over-Income (Above 80% of AMI) Tenants in "Floating Units"
Over-income tenants in HOME-assisted "floating" units must pay 30 percent of their adjusted income for rent and utilities; however, the rent may not exceed the market rent for comparable, unassisted units in the neighborhood. Rent may only be increased at lease renewal. In projects where the HOME units float, the next available unit in the project of comparable size or larger must be rented to a HOME-eligible household. The unit occupied by the over-income tenant is no longer considered HOME-assisted subject to HOME rules after a HOME-eligible household rents a comparable unit.

Note: In units that are financed with both HOME and Low Income Housing Tax Credits (LIHTCs), the LIHTC rules apply when a tenant's income exceeds 80% of AMI Under the LIHTC program, the tenant's rent is not adjusted, and the unit does not need to be replaced by another comparable unit until the tenant's income rises above 140 percent of the LIHTC program eligibility threshold.

B. Adjusting Rent for Over-Income (Above 80% of AMI) Tenants in "Fixed Units"

Over income tenants in HOME-assisted "fixed" units must pay 30 percent of their adjusted income for rent and utilities. Rent may only be increased at lease renewal. There is no rent cap for "fixed" units.

Computing adjusted income for purposes of adjusting rent for over-income tenants is derived by subtracting any of the following deductions (also called allowances) that apply to the household from a household's annual (gross) income:

- $480 for each dependent (includes any of the following family members who are not the head of household or spouse: persons under 18, handicapped/ disabled family members, or full-time students);
- Reasonable child care expenses (for children 12 and under) during the period for which annual income is computed that enable a family member to work or go to school, if no adult is available in the household to provide child care.
- For elderly households (62 and older) only, medical expenses, including medical insurance premiums, in excess of three percent of annual income that are anticipated during the period for which annual income is computed and that are not covered by insurance.
- Reasonable expenses in excess of three percent of annual income for the apparatus and care of a handicapped or disabled family member that enable that person or another person to work that are anticipated during the period for which annual income is computed.
- $400 for any elderly family (head of household or spouse is 62 or older or handicapped or disabled).

For a detailed discussion of calculating annual and adjusted income under the Part 5 Definition of annual income, see the HOME Model Series "Technical Guide for Determining Income and Allowances for the HOME Program." For up-to-date rules and requirements, consult the regulations at 24 CFR Part 5 (subpart F).

DEVELOPMENT PROPERTY MANAGEMENT

Many established owners have property management departments within their organizations or have created separate organizations to perform this function. Other developers hire one management firm to manage properties in its portfolio. Property management is important to ensure the owner's physical, financial, administration and occupancy performance standards for the property. When working with the DHCD-assisted units, it is expected that the owner enter into an agreement that the units will be operated in accordance with all applicable regulations.

TENANT OUTREACH

All HOME Rental Projects maintain a constant presence within the community where

the Project is located.

Examples:

- Advertisement within the Baltimore Sun Newspaper biannually, monthly
- Advertisement within the Howard County Flier Newspaper biannually, monthly
- Advertisement within the Howard County Times Newspaper biannually, monthly
- Twice per year post card mailing to all Howard County Housing Choice Voucher Clients
- Property owner Web-site
- One time per year Marketing Event at HOME Rental Location.

31. Recording documents related to a HOME Activity

After all HOME related documents are fully executed; that is they have been signed by the County Executive and returned to the DHCD, both the Regulatory Agreement and Deed of Trust should be sent to the Office of Recordation to be recorded. DHCD staff will provide a copy to non-profits and subrecipients at no additional cost.

32. Record Keeping

HOME requires documentation for rental projects to show that all program regulations have been met. Because of the long-term monitoring required for rental projects, however, record-keeping responsibilities are more extensive. This section briefly describes the record-keeping responsibilities associated with rental housing for the property owner.

One of the owner's responsibilities is to keep adequate records, to be able to demonstrate compliance with HOME requirements. The owner should keep both project and tenant records.

- Project records should include documentation to back-up rent and utility allowance calculations. If the project's HOME-assisted units are "floating," the owner should also keep records to show how HOME occupancy targets were met (for example, rental logs to show that as units were vacated or tenants became over-income, HOME-assisted units were properly replaced).
- Tenant files should include the documentation necessary to demonstrate that each HOME-assisted unit is properly occupied by an income-eligible tenant. Such documentation includes the tenant's application, initial income verification documents, subsequent income recertification documents and the tenant's lease.

General rental housing records must be kept for five years after project completion. Tenant income, rent and inspection information must be kept for the most recent five years, until five years after the affordability period ends.

APPENDIX A: Program Administration Procedures (updated per the 2013 HOME Rule)

A. Project Underwriting and Subsidy Layering

i. Project underwriting

Most HOME projects in Howard County have multiple sources of funds and are seeking HOME funds to fill the gap in their project budget.At a minimum, the HOME Program Specialist and Grants Administrator review a project application to make sure the project is underwritten well, will be stable in the long-term, and will be leveraging HOME funds. For larger projects (over 5 units), the Grants team completes an extensive review of the project's financing to determine how best to meet its budget needs. This is an addition to a review of the project's underwriting by the HOME Program Specialist.

ii. Subsidy Layering

Before committing funds to a rental project, DHCD will evaluate the project and verify that the owner did not request or was not allocated any more HOME funds in combination with other governmental assistance than is necessary to provide the affordable housing. DHCD will review and keep project records demonstrating that each rental housing project meets required subsidy layering guidelines. Part of the documentation process includes a Proforma (project income and expense statement) which should include achievable rent levels, market vacancies and operating expenses.

The investment of HOME funds is limited by per-unit subsidy limits based on number of bedrooms and location. The HOME Program Specialist reviews each project to ensure the subsidy level is appropriate and complies with the maximum and minimum per-unit HOME subsidy limits as established by HUD. DHCD's staff will also complete a subsidy layering review as part of their underwriting unless a subsidy layering review has been completed by the state Department of Housing and Community Development because of state funds in the project. In those cases, DHCD staff review the state subsidy layering.

B. Homebuyer Underwriting

The Department can use HOME Program funds for settlement down payment and closing cost assistance to assist eligible homebuyers and will do so from time to time as the need arises. Should the Department of Housing use HOME Program funds for settlement, down payment and closing cost assistance, the County will do so only if the activity is noted in the Annual Action Plan or by making an amendment to the Annual Action Plan.

To be eligible for HOME Program funds eligible candidates will be subject to the following requirements;

- Eligible candidate will be awarded loans up to $40,000 toward the settlement and down payment costs associated with the purchase of a single-family dwelling unit; The minimum subsidy limit for a HOME Program transaction is $1,000 and the maximum subsidy that can be placed into a HOME-eligible activity is outlined in HUD correspondence dated December 21, 2015. CPD Notice15-003 can be referenced for the methodology.
- The dwelling unit purchased with HOME Program funds must be the principal resident of the applicant;
- Eligible applicants must have a household annul gross income of no more than 80 percent of the area median income as prescribed by HUD adjusted for household size and these values will be changed from time to time;
- The debt to income (DTI) ratio of an applicant must not exceed 45 percent;
- The loan to value (LTV) will not exceed 105 percent;
- The sales price of the home must not exceed 95 percent of the area median income purchase price. If rehabilitating the property after rehabilitation value must not exceed 95% of the area median purchase price as published by HUD and updated from time to time; or as determined locally through market analysis; `;
- HOME- eligible applicants should have at least $1,000 and one month's mortgage payment in a savings account. If a HOME-eligible applicant possesses assets that exceed three month's mortgage payment plus $1,000 in a savings account, HOME assistance will be reduced;
- Since this is a direct subsidy to the homebuyer, the eligible candidate is subject to the recapture provision;
- Applicant must be in the process of or have acquired a first mortgage at the time of application for HOME assistance;
- Applicant must have a credit score of at least 600; and
- Applicant must be a first-time homebuyer.

HOMEBUYER COUNSELING

Homebuyers receiving down payment assistance or homebuyers that reside in HOME-assisted units must receive housing counseling before and after the purchase of the property. The cost of housing counseling can be charged as an eligible project cost, which is subject to the per unit maximum subsidy limit. The prospective homebuyer can be charged for counseling, so long as the costs are reasonable. Homeownership counseling should provide information on financial management assistance, home sales contracts, and mortgage transactions and also assist homebuyers with eliminating any credit problems that may prevent the homebuyers from purchasing the property. Pursuant to the HUD publishing, Housing Counseling: New Certification final rule (December 14, 2016), housing counselors and housing counseling agencies are now required to be certified to be eligible to assist HOME eligible applicants. The Department will work with housing counselling agencies in becoming certified.

C. Risk-based Monitoring

Howard County's monitoring policy is to monitor each HOME funded rental project each year. This monitoring visit includes a file review as well as a review of financial statements for the project. A sample of units are inspected at every project every year. If a monitoring visit reveals significant project issues, a follow up visit would be scheduled within two months of the original visit to make sure all issues had been sufficiently addressed.

D. Inspection Procedures

Howard County's HOME units are inspected by the Program Specialist and Operations Supervisor. Units are held to a higher standard than UCPS which is a standard unit checklist for leasing a market rate unit. Issues ae rated in terms of what must be corrected and what is recommended to be fixed. Projects have a thirty (30) day period to make any unit improvements that have been identified as flawed.

APPENDIX B: Howard County Affirmative Fair Housing Marketing Plan

A. POLICY

Howard County Housing (DHCD) in accordance with the regulations of the HOME Investment Partnerships (HOME) Program (24 CFR 92.3510), has established this "Affirmative Fair Housing Marketing Plan" to ensure that the County and all entities to whom they have allocated HOME Funds employ a marketing plan that promotes fair housing and ensures outreach to all potentially eligible households, especially those least likely to apply for assistance.

The County's policy is to provide information and attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status (persons with children under 18 years of age, including pregnant women), or disability. The procedures followed are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), and Executive Order 11063, which prohibits discrimination in the sale, leasing, rent and other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

B. PROCEDURES

The HOME Final Rule regarding affirmative marketing procedures and requirements apply to all rental, homebuyer, rehabilitation, down payment assistance and TBRA projects funded with HOME Program funding.

DHCD is committed to the goals of affirmative marketing that will be implemented through the following procedures:

i. Providing equal service without regard to race, color, religion, sex, handicap, familial status, or national origin of any client, customer, or resident of any community;

ii. Keeping informed about fair housing laws and practices;

iii. Informing clients and customers about their rights and responsibilities under the fair housing laws by providing verbal and written information;

iv. Evaluating the effectiveness and compliance of all marketing as it relates to fair housing;

v. Including the Equal Opportunity logo or slogan, and where applicable the accessibility logotype, in all ads, brochures, and written communications to owners and potential tenants;

vi. Displaying the HUD's fair housing posters (at a minimum in English and Spanish

versions) in rental offices or other appropriate locations;

vii. Soliciting applications for vacant units from persons in the housing market who are least likely to apply for assistance without the benefit of special outreach efforts; working with the local public housing authority and other service and housing agencies, as well as community groups, places of worship, employment centers, fair housing groups, housing counseling agencies and popular social media tools to distribute information to a wide and diversified population;

viii. Maintaining documentation of all marketing efforts (such as copies of newspaper ads, memos of phone calls, copies of letters).

vix. Maintaining a record of applicants for vacant units with a general profile of the applicant, how the applicant learned of the vacancy, the outcome of the application, and if rejected, why; maintaining this record for two years or through one compliance audit, whichever is the shorter period of time.

C. ASSESSMENT

In conjunction with the annual on-site compliance reviews, DHCD will:

i. Review and evaluate records of affirmative marketing efforts (advertisements, flyers, and electronic media spots, etc.);

ii. Evaluate outcomes and effectiveness of marketing efforts and make changes where needed.

iii. Evaluate whether good faith efforts have attracted a diversified cross-section of the eligible population.

D. CORRECTIVE ACTIONS

Failure to meet affirmative marketing requirements will result in the following corrective actions:

i. For failure to comply, DHCD will set a probationary period for compliance, not to exceed six months, during which time DHCD will provide more specific guidelines for compliance.

ii. Further failure to comply with the affirmative marketing requirements may result in the withdrawal of HOME support.

iii. Further failure to take appropriate actions to correct discrepancies in affirmative marketing programs may result in steps to recover all invested HOME funds.

APPENDIX C: Monitoring Plan

A. Objectives

The objective of the Howard County HOME Monitoring Plan is to establish standards for evaluating and reporting a grantee's compliance with program requirements. Howard County will conduct on-site reviews to verify accuracy of records/documents, review program policies and procedures, conduct housing inspections, and evaluate overall administrative compliance to HOME Regulations.

B. Monitoring Format

A written Report will be prepared and provided to the grantee following the completion of each monitoring review. The report will include the following information:

- An explanation of the purpose and scope of the review;
- A list of findings, comments, recommendations, and corrective actions to be taken;
- A list of the client files reviewed;
- A list of the houses/units inspected;
- An evaluation of project performance to date; and
- A time frame for taking corrective action.

C. Monitoring Compliance

HOME activities will be evaluated on the basis of the following program areas:

- Adherence to HOME guidelines, procedures, and regulations;
- Grantee's administration and management;
- Fair Housing;
- Housing Quality Standard Inspections;
- And Lead Based Paint, if applicable

D. Pre-Monitoring Preparation

Prior to an on-site monitoring visit, the County will provide written notification of the visit to the grantee. The notice will provide the following information:

- The date(s) and time of the visit;
- A copy of the monitoring checklist

The grantee will be asked to provide the County with the following:

- Agreements/contracts;
- Policy guidelines and procedures, administrative plans, and operation manuals;
- Beneficiary data

E. Monitoring and Inspection Schedule

DHCD staff will provide program monitoring over three phases:

i.Contract Development Phase

- Ensuring that projects are consistent with the Consolidated Plan
- Ensuring that all Environmental Review requirements have been met
- Ensuring clients are income-eligible

ii. Development Phase

- Ensuring that project costs, budgets, and timelines are adhered to
- Ensuring conformance to HOME standards through periodic property inspections

iii. Post-Development Phase (Long-Term)

- The duration and frequency of on-site grantee monitoring and inspections is based on the length of the affordability period and the total number of project units.

Appendix D: Using the Low Income Housing Tax Credits with HOME Funds

There are essentially four ways HOME funds can be used with low-income housing tax credits.

Market Rate Loan

If the HOME funds are provided at or above the applicable federal rate, these funds are not treated like a federal subsidy. The project qualifies for the 9% credit for eligible improvement costs and is eligible for the 130 percent basis for projects in "qualified census tracts" or "difficult development areas" (QCT/ DDA).

Below Market Rate Loan with 9% Credit

IfHOME funds are provided at an interest rate below the applicable federal rate, they may still be counted in the eligible basis and the project may receive a 9% credit if the project meets stricter occupancy requirements. The project may receive the 9% credit if 40% of the residential rental units are occupied by tenants with incomes at or below 50% of the area median income. However, such projects are not eligible for the 130 percent basis for projects in "qualified census tracts" or "difficult development areas".

Below Market Rate Loan with 4% Credit

Some projects qualify only for a 4% credit regardless of the way HOME funds are invested in the project. For example, a project with other Federal or tax-exempt mortgage revenue bond funds included in the basis is only eligible for a 4% credit under any circumstance, so HOME funds can be lent at any below market interest rate terms without consequence to the credit.

Grant

HOME funds may be provided in the form of a grant, but, they may not be counted in the eligible basis for the project, and therefore do not contribute to the credits for which the project is eligible. Therefore, a loan instrument is generally preferable to a grant (Note that deferred payment loans are generally permissible provided the debt service accrues and there is a reasonable expectation that the loan can be repaid no later than when the loan matures). Projects using HOME funds with Low Income Housing Tax Credits have to consider a number of items in blending the two sets of program rules. The following chart provides an overview of tax credit rules and the requirements for combining the two programs.

RULES FOR COMBINING HOME FUNDS AND TAX CREDITS

	Tax Credit Program Rules	Combining Tax Credits with HOME
Occupancy Requirements	At least 20 percent of assisted units must be reserved for households with incomes at or below 50 percent of area median; OR 40 percent of the units must be reserved for households with incomes at or below 60 percent of area median income.	If HOME funds are provided at below the market interest rate, at least 40 percent of the units must be reserved for households with incomes at or below 50 percent of the area median income to qualify for the 9 percent credit. Otherwise, on projects with 5 or more HOME-assisted units at least 20 percent of the units must serve households with incomes at or below 50 percent of area median income (to meet HOME requirements).
	Tax Credit Program Rules	Combining Tax Credits with HOME
Rent Requirements	Rents for qualified units must not exceed the rent limit set for the program. These limits are set by bedroom size and are based on the qualifying incomes of an imputed household size. They are provided by Howard County Housing.	For units to qualify as both tax credit and HOME-assisted units, rents cannot exceed either program limit. Low HOME rent units are subject to Low HOME rents and tax credit limits and High HOME rent units are subject to High HOME rents and tax credit limits.
Establishing Tenant Eligibility	Documentation --Tenants must provide acceptable documentation of income from a third party source. All sources of income are verified. Definitions --The tax credit program defines income using the Section 8 definition of annual (gross) income. Asset Income --Assets $5000 or less: tenants certify asset amount and income. Use actual income. Assets above $5000: verify amount and income. Use larger of actual income from assets or imputed asset income.	Documentation --Initial tenant eligibility documentation for both programs is the same. Definitions -DHCD requires the use of the Section 8 definition of income for HOME. Asset Income --Follow more stringent HOME rules and verify all asset income.

Reexaminations of Income	Reexaminations are performed annually following the	Tax credit/ HOME projects may request waivers m order to perform

	Procedures as at initial certification; however, an owner may request a waiver of reexamination requirements if all units in the project are tax credit	Re-examinations similar to HOME. Otherwise, the project must follow the more stringent tax credit requirements.
Over-Income Tenants	Rent for over-income tenants remains restricted. An owner may increase an over-income tenants rent, but only after the unit is replaced with another low-income unit in the project, thereby keeping the portion of low-income units above the minimum amount required for the owner to be eligible for the credit. "Over-income"IS defined as above 140 percent of the project income limit.	HOME rules defer to tax credit rules -- rent remains restricted. (In other words, in no case can the rent exceed limits set by the tax credit program).
	Tax Credit Program Rules	Combining Tax Credits with HOME
Monitoring	Projects are monitored annually throughout the affordability period. Statement of compliance IS submitted annually with documentation of occupancy. On-site inspections are conducted by DHCD	DHCD will monitor according to their program requirements.

Occupancy Requirements

Tax credit projects must set aside at least 20 percent of their units for tenants with incomes at or below 50 percent of the area median (20/ 40 set-aside) or 40 percent of their units for tenants with incomes at or below 60 percent of the area median income (40/ 60 set-aside). When combining HOME and tax credits, occupancy requirements depend on the type of credit taken and the type of HOME funding provided:

In order to take the 9 percent credit in conjunction with below-market-rate HOME funds, joint HOME/ tax credit projects must meet a higher occupancy standard than either the tax credit program or the HOME program alone requires:

- 40 percent of the units must be occupied by tenants with incomes at or below 50 percent of area median. (However, such projects are not eligible for the 130 percent

increase in basis for projects in "qualified census tracts" or "difficult development areas."

- To receive the 130 percent increase, the project must either take the four percent credit, or use the HOME funds at or above the applicable federal rate.)

- In all other cases, projects must ensure that they meet both sets of program rules.

Rents

When combining the two types of funding, two sets of rent rules apply.
Qualified tax credit units must not exceed tax credit rent limits, while HOME-assisted units must meet HOME rent requirements. If a unit is being counted under both programs, the stricter rent limit applies:

- Low HOME rent units are subject to the lower of the Low HOME rent and the tax credit rent.
- High HOME rent units are subject to the lower of the High HOME rent and the tax credit rent.

When tenants receive additional subsidy through rental assistance programs such as Section 8, additional requirements apply.

- HOME allows the rent to be raised to the rental assistance program limit only if the tenant pays no more than 30 percent of adjusted income, the subsidy is project-based (not tenant-based), and the tenant's income is less than 50 percent of the area median income.
- Tax credit rules state that if the rental assistance program rent limit exceeds the tax credit rent, the unit rent may be raised to the higher limit as long as tenants pay no more than 30 percent of their adjusted monthly income for housing costs.
- In a joint tax credit/ HOME-assisted unit, the stricter HOME requirements would apply.

Establishing Tenant Eligibility

Both the HOME and tax credit programs require project owners to certify tenants' incomes, to ensure that they are income-eligible and that the project is in compliance with initial occupancy requirements.

- To demonstrate eligibility under both programs, property managers must have tenants certify their income, and obtain supporting documentation. This documentation must be kept in project unit files for review by the monitoring agencies.
- Under tax credit rules the Section 8 definition of annual (gross) income is used.
- DHCD requires the use of the Section 8 definition of armual (gross) income for HOME projects.

A difference between HOME and tax credit rules is that HOME requires verification of all asset income, whereas the tax credit rules require verification of asset income if the household's

assets are greater than $5,000. For total assets of less than $5,000, the tax credit program allows tenants to provide a signed statement of asset income.

A tenant in a unit subsidized by both sources of funds would have to comply with the stricter HOME requirements.

Reexaminations of Tenant Eligibility

The tax credit program does not allow alternative methods of tenant recertification allowed under the HOME program.

For projects with both HOME funds and tax credits, owners may seek a project waiver from the state allocating agency to allow certification documentation similar to HOME. Alternatively, the project must comply with the tax credit rules (and, thus, automatically comply with the HOME requirements).

Over-Income Tenants

The HOME and tax credit programs have slightly different approaches to over-income tenants. The definition of an over-income tenant differs under the two programs. Tax credit rules define "over-income" as having income above 140 percent of the project income limit.

Under HOME, the tenants are considered over-income if their income rises above 80 percent of area median income.

Further, unlike under HOME, the rent remains restricted under the tax credit program. An owner may increase an over-income tenant's rent, but only after the unit is replaced with another low- income unit in the project, thereby keeping the portion of low-income units above the minimum amount required for the' owner to be eligible for the credit. To resolve this conflict, HOME rules state that when funds from both programs are used on the same unit, the tax credit rules should be followed.

Monitoring

Both programs require annual monitoring to ensure compliance with program rules over the length of a pre-established affordability period. DHCD will monitor according to their program requirements.

Additional Notes

- Deed of Trust- The trustee is always the current director of Finance. Typically there are two trustees, but since a Chief of Staff was not replaced, there is only one. Older deeds may show two trustees, Aaron Greenfield and Sharon Greisz,
  At time of this publication it is Stanley Milesky.
- Completed grant/loan documents should be printed single sided and only one copy of each document is required for signatures.

- Once all documents have been returned with signatures, the Deed of Trust and Regulatory Agreements should be recorded. They are sent to the Division of Land Records. If a payment is necessary to have the documents recorded, they should be sent to the Department of Finance first. If a payment is NOT necessary, the documents should still be sent to the Department of Finance, with attention to Leslie Bennett. However, if the document is exempt from payment, please use the following text in the header;

  "PURSUANT TO SECTION 3-603 OF THE REAL PROPERTY ARTICLE OF THE ANNOTATED CODE OF MARYLAND, THIS DEED OF TRUST IS EXEMPT FROM THE PAYMENT OF RECORDING FEES. EXEMPTION PURSUANT TO SECTION 12-108(a) TAX-PROPERTY ARTICLE."

APPENDIX E: Annual Rent and Income Checklist- Form 6-D

HOME Monitoring Checklist 6-D

Project Compliance Report: Rental Housing

Project Name:		Date Completed:	
Owner Name:		Reporting Period:	

A	B	C	D	E	F	G	H	I	J	K	L
UNIT NUMBER	LOW OR HIGH HOME RENT UNIT?	TENANT NAME: **(LAST NAME, FIRST NAME)**	NO. PERSONS	NO. BEDROOMS	DATE OF LAST INCOME CERT.	MAX RENT	UTILITY ALLOWANCE	MONTHLY UNIT RENT	TENANT'S ANNUAL GROSS INCOME	COMPLIANCE Y/N (HCH Staff)	**UNIT STATUS** (HCH Staff)

APPENDIX F: Annual Review of Rents and Income Form

Howard County Department of Housing and Community Development

Howard County HOME Investment Partnership Program (HOME)

Annual Review of Rents and Income

Instructions: Please initial after each step is completed. Once step four (4) has been completed, the employee should print their name, sign and date below. Place the completed form, along with Checklist 6-D (Project Compliance Report) and a copy of the correspondence letter in the respective file under monitoring.

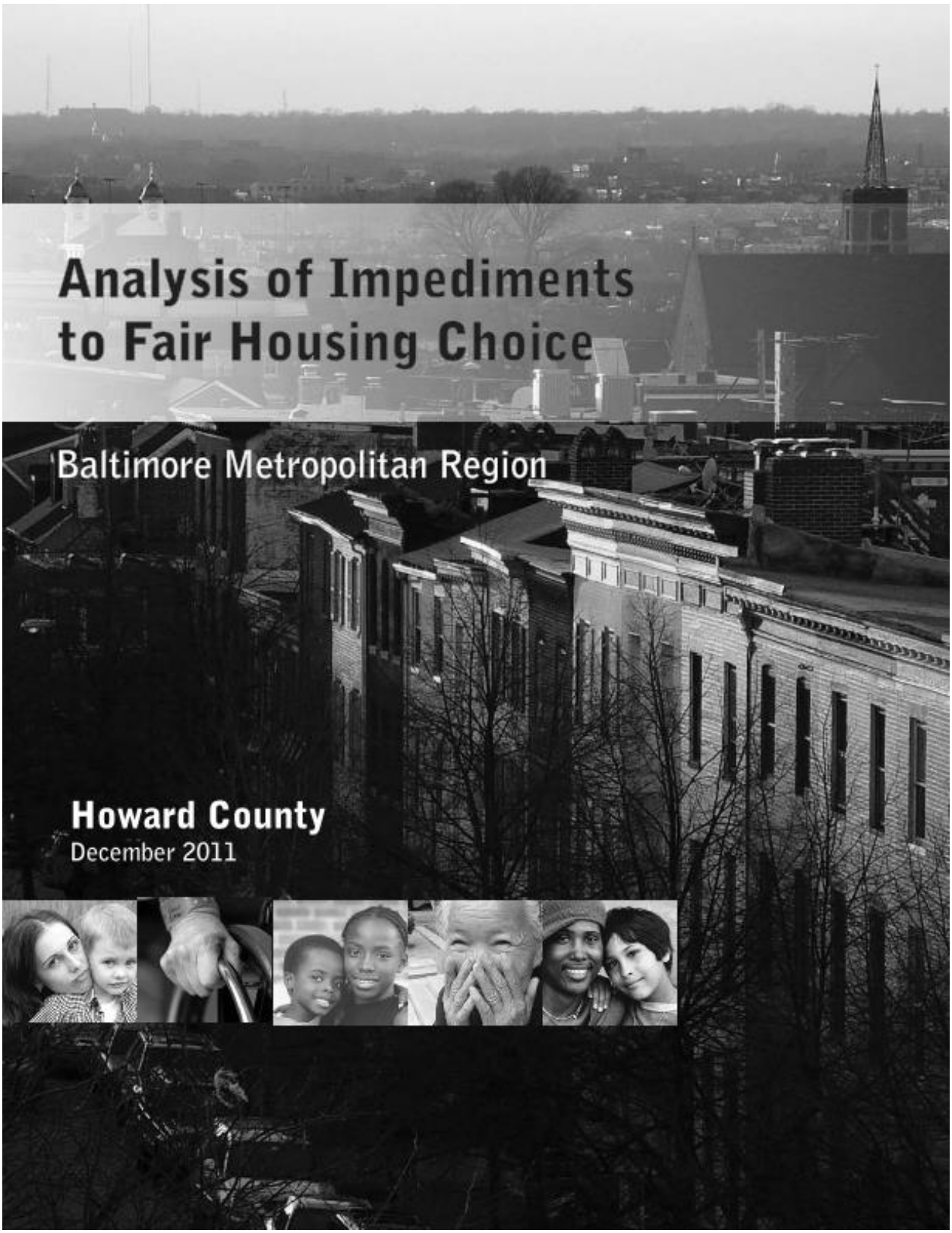
Project Name/Mgmt Company: _____

1. Emailed notice to property manager. Initials_____
2. Rent roll and Income data submitted to Howard County Housing. Initials_____
3. Review rents and income and complete checklist 6-D. Initials_____
4. Write correspondence letter to property manager. Initials_____

Review completed by (Please Print): _____

Signature: _____

Date: _____


Analysis of Impediments
to Fair Housing Choice
Baltimore Metropolitan Region
Howard County
December 2011

BALTIMORE METRO AREA
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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1. HOWARD COUNTY

A. Background

Howard County is located in central Maryland between the City of Baltimore and Washington, D.C. Both suburban and rural in nature, 60% of the County is in a rural/preserved area while the remaining 40% is in a designated growth area, delineated by the growth boundary. Within the growth area, the housing mix is approximately 50% single-family detached, 25% apartments, and 25% townhouses. Generally, the housing stock is older and of modest size.

There are no incorporated municipalities in Howard County. However, the County is home to several census-designated places, including Ellicott City (the county seat), Elkridge, North Laurel, Savage-Guilford and Columbia.

Columbia, one of the first major planned communities in the U.S., was designed by The Rouse Company in the 1960s to not only eliminate the inconveniences of then-current subdivision design, but to also eliminate racial, religious and income segregation. Between 1966 and 1990, 10 self-contained villages rose according to the philosophies and direction of James Rouse, who remained involved in the intentional integration of the community. Rouse refused to do business with builders or real estate agents engaged in discrimination or steering, explaining in a memo to all that "It is our hope that Columbia's policy as to race may be so clear and vivid from the beginning that it will be unmistakable to everyone."[1] The plan provided concentric circles of single-family homes, townhouses and apartments that shared common amenities within each village, structuring economic integration by clustering a variety of affordable housing types with walkable access to jobs, stores, services and transit connections.

Howard County continues to grow in population, increasing more than 11% since 2000. Household income data reveals that net migration into the County occurred mostly among households earning $75,000 or more. As a result, new residents tend to be well-educated and employed in higher-skilled, higher wage jobs. Consequently, a less economically diverse population underscores the need for a variety of housing options to provide adequate housing choice for households of all sizes and income levels.

While the County continues to be predominantly White, diversity among the minority population is increasing. In fact, the racial makeup of the County has changed dramatically since 1980. The largest increase in minority population in Howard County is among Asian/ Pacific Islander households, which has grown 1335.8% over the last 30 years. In addition, the Hispanic population has increased significantly, now accounting for over 12,000 residents. Blacks remain the largest racial minority group in the County.

Development patterns have shifted from the western part of the County in the 1960s to the central, southern, and eastern portions, as a result of planning efforts to direct development into urban areas, such as Columbia. The County has undertaken consistent planning efforts since the 1960s to insulate the rural western portion of the County from

[1] Marx, Paul. Jim Rouse: Capitalist/Idealist. University Press of America, 2007. p. 133

development pressure. Today, higher concentrations of Black residents are found in Guilford, Waterloo, Savage, Jonestown, Simpsonville, and Ellicott City. Asian residents are concentrated in Pine Orchard and Clarksville, while many Hispanic residents live in or around Columbia.

B. Demographic Profile

i. Population Trends

As is the case in other counties in the Baltimore region, the racial composition of Howard County has increased dramatically since 1980. Total population has surged nearly 132%, although growth appears to have moderated during the most recent decade. Whites now account for 63.7% of the population, down from 85.5%. This has resulted from a nearly fivefold increase in minority residents to almost 100,000 in 2008 compared to 17,218 in 1980. Asian/Pacific Islanders have experienced the largest percentage increase, growing 1335.8% over nearly 30 years. Hispanics have seen their numbers rise to over 12,000 from less than 1,500. Blacks remain the largest racial minority at 47,000 residents.

Figure 1-1
Population Trends, 1980-2008

	1980		1990		2000		2008		% Change
	#	%	#	%	#	%	#	%	1980-2008
Howard County	**118,572**	**100.0%**	**187,328**	**100.0%**	**247,842**	**100.0%**	**274,995**	**100.0%**	**131.9%**
White Population	101,354	85.5%	153,540	82.0%	179,679	72.5%	175,073	63.7%	72.7%
Non-White Population	17,218	14.5%	33,788	18.0%	68,163	27.5%	99,922	36.3%	480.3%
Black	13,899	11.7%	21,982	11.7%	35,412	14.3%	47,001	17.1%	238.2%
Asian/Pacific Islander	2,285	1.9%	8,059	4.3%	18,837	7.6%	32,808	11.9%	1335.8%
All Other Races	1,034	0.9%	488	0.3%	6,596	2.7%	7,657	2.8%	640.5%
Hispanic	1,484	1.3%	3,259	1.7%	7,318	3.0%	12,456	4.5%	739.4%

Source: U.S. Census Bureau, 1980 Census (Table DP-1); 1990 Census (STF1, P008), Census 2000 (SF3, P7), 2008 American Community Survey (B02001, B03002)

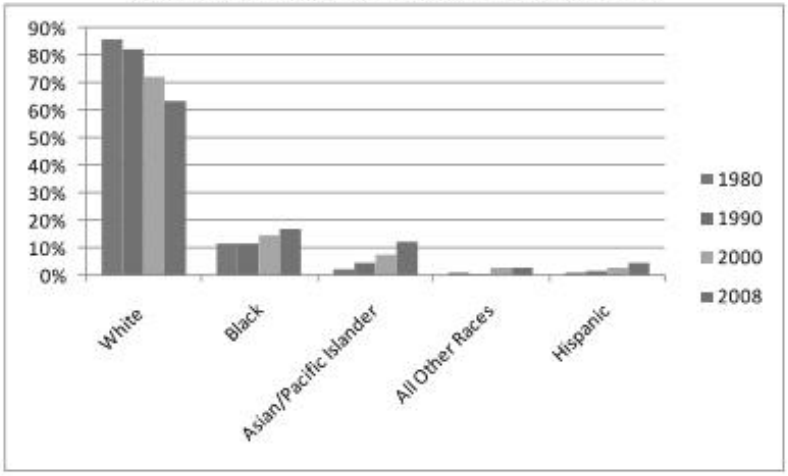
Diversity among the minority population is also increasing. In 1980, there were 17,218 minority residents in Howard County with Black residents accounting for 81% of all minorities. By 2008, Blacks comprised only 47% of the minority population as a result of significant increases in Asian/Pacific Islanders (+1335.8%), Hispanics (+739.4%), and persons of all other races (+640.5%).

> OBSERVATION: Howard County has experienced significant growth rates between 1980 and 2008.

For the purposes of this report, detailed analysis is provided for the primary races in Howard County, which include Whites, Blacks, and Asian/Pacific Islanders. Hispanics are included as an ethnic minority. In all other cases,

the sample size of the population of an individual race was identified by the Census Bureau as being too small to analyze.

Figure 1-2
Trends in Racial and Ethnic Characteristics, 1980-2008



OBSERVATION: Since 1990, minorities have increased from 14.5% to 36.3% of the total population in Howard County.

ii. Areas of Racial and Ethnic Minority Concentration

HUD defines areas of racial or ethnic minority concentration as geographical areas where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the County overall. In Howard County, Blacks comprised 18% of the population in 2009. Therefore, an area of racial concentration would include any census tract where the percentage of Black residents is 28% or higher. There are 13 census tracts which meet this criterion, all of which are depicted in the following chart and illustrated in Map 1. These areas include Savage, Columbia, Laurel and Ellicott City.

Asian/Pacific Islanders comprised 12.4% of the population in 2009. Therefore, an area of racial concentration would include any census tract where the percentage of Asian/Pacific Islander residents is 22.4% and higher. There are four tracts that meet this criterion, all of which are depicted on the following chart and illustrated in Map 2. These areas include Columbia and Ellicott City.

Hispanics represent 5.5% of the population. An area of ethnic concentration would include any census tract where the percentage of Hispanics is 15.5% or

higher. One census tract, 6066.03, meets this criterion, and is located in the Columbia area.

The following chart provides a summary of the percent of residents by race and ethnicity in each census tract in Howard County. All impacted areas are highlighted in light blue.

Figure 1-3
Areas of Racial and Ethnic Concentration in Howard County, 2009

Neighborhood	Census Tract	Total Population	White	Minority Residents		
				Black	Asian/Pacifi	Hispanic
			%	%	%	%
Howard County	**Total**	**275,960**	**64.6%**	**18.0%**	**12.4%**	**5.5%**
Clarksville	6051.01	7,745	79.0%	7.7%	10.1%	3.1%
West Friendship	6030	9,935	79.8%	8.4%	8.7%	2.3%
Savage	6067.03	6,466	48.3%	**29.6%**	14.8%	7.2%
	6069.01	4,552	49.2%	**37.8%**	7.5%	7.2%
	6069.02	9,153	52.8%	26.3%	13.7%	10.4%
Elkridge	6011.01	7,118	69.1%	13.7%	13.0%	4.0%
	6011.02	10,235	68.9%	13.7%	12.4%	4.7%
	6012.01	5,861	75.5%	11.8%	7.9%	3.6%
	6012.02	4,507	65.5%	24.6%	5.7%	3.9%
Columbia	6051.02	5,394	74.2%	7.9%	14.0%	3.4%
	6054.01	4,895	53.8%	23.9%	12.2%	14.6%
	6054.02	4,948	52.8%	**31.8%**	8.7%	6.7%
	6055.01	5,617	63.5%	8.4%	**24.3%**	3.3%
	6055.02	4,992	58.6%	23.9%	12.6%	5.1%
	6055.03	5,808	46.2%	**36.2%**	9.0%	9.8%
	6056.01	5,608	61.0%	23.3%	10.3%	4.8%
	6056.02	6,793	62.4%	22.0%	11.5%	5.2%
	6066.01	2,788	61.4%	25.6%	8.5%	5.8%
	6066.03	6,945	43.3%	**36.2%**	9.9%	**16.6%**
	6066.04	3,449	50.1%	**34.0%**	9.1%	6.4%
	6066.05	8,648	49.8%	**31.7%**	11.1%	10.5%
	6067.01	2,578	79.8%	10.6%	6.2%	2.8%
	6067.04	6,513	53.9%	**30.4%**	8.8%	7.0%
	6067.05	1,907	65.7%	17.9%	10.7%	5.2%
	6068.03	5,200	60.1%	21.0%	13.3%	6.2%
	6068.04	3,039	61.3%	20.9%	13.0%	8.2%
Laurel	6068.02	7,363	74.4%	8.8%	13.3%	4.7%
	6069.03	8,478	46.0%	**33.1%**	9.7%	13.4%
Lisbon	6040.01	5,481	84.9%	8.4%	4.0%	3.1%
	6040.02	5,417	84.2%	8.4%	4.6%	2.5%
Ellicott City	6021	6,352	74.4%	9.0%	14.2%	2.6%
	6022	7,496	71.4%	9.5%	16.1%	3.4%
	6023.02	4,776	66.3%	16.1%	13.2%	3.2%
	6023.03	3,657	59.5%	5.3%	**32.3%**	3.0%
	6023.04	4,369	72.6%	5.5%	18.4%	2.3%
	6023.05	3,621	72.8%	7.0%	17.2%	3.1%
	6023.06	4,319	69.6%	8.4%	18.2%	4.1%
	6026	4,262	50.9%	15.2%	**27.9%**	8.9%
	6027	2,295	80.3%	9.6%	6.9%	3.0%
	6028	4,758	64.6%	13.4%	17.6%	5.5%
	6029	3,318	51.8%	16.5%	**26.4%**	6.0%

Source: DemographicsNow

OBSERVATION: There are thirteen areas of minority concentration (Black, Asian/Pacific Islander, and/or Hispanic) in Howard County. These areas are located in Savage, Columbia, Laurel and Ellicott City.

The following three maps depict the geographic location of areas of racial and ethnic concentration. In Howard County, the census tracts outlined in red are areas of concentration of Black residents, which are also referred to as impacted areas. Census tracts denoted with an orange cross-hatch pattern are areas of concentration of Asian/Pacific Islanders, also referred to as impacted areas. The census tracts denoted with a green cross-hatch pattern are areas of concentration of ethnic (Hispanic) residents, similarly referred to as impacted areas. It is within these impacted areas that other demographic characteristics—such as income and housing—will be analyzed.

Some context is available to describe racial trends in settlement within Columbia, a community nationally recognized for its progressive means of deliberately encouraging integration of all types. In a series of three articles published in November 2000, the Baltimore Sun studied what it described as "two Columbias": one "an affluent community with a diverse population, strong schools, escalating property values, 84 miles of bicycle and walking paths, manicured parks and little crime," and "a disparate collection of stagnating neighborhoods, struggling schools and off-and-on trouble spots."[2] The boundaries of the latter were defined to include parts of at least five villages: Wilde Lake and Harper's Choice, which are west of Route 29, and the eastern villages of Owen Brown, Oakland Mills and Long Reach. These are the five oldest Columbia villages, developed between 1966 and 1972.[3]

Village design explains some of the disparity, as the earliest Columbia developments contain a greater share of affordable housing types. The newest villages, River Hill and Town Center, do not offer any subsidized housing units, while Harper's Choice and Long Reach carry the heaviest concentration of project-based Section 8 units.[4] During the last two decades, Columbia's oldest neighborhoods have been characterized by rising crime, stunted property values and increasing concentrations of poor families, which has triggered "a new kind of urban flight" that threatens the type of segregation the community was built to avoid.[5]

Some upper-income families from neighborhoods in decline have relocated to areas like River Hill, the least densely developed, most affluent and

[2] Espstein, Gady A. "Columbia at a Crossroads." The Baltimore Sun, November 26-28, 2000.
[3] The Columbia Archives, a service of The Columbia Association. Online: www.columbiaarchives.org
[4] Miller, Shauna. "Columbia's Ideals in Question Decades after Town's Birth." News21, a project of the University of Maryland's Philip Merrill College of Journalism. August 5, 2009.
[5] Epstein

ostensibly most exclusive village, built in 1990. The Rouse Company's original plan for River Hill included 90 acres in River Hill for multi-family housing, but following public pressure for lower-density environment, county officials reduced the number of acres dedicated to multi-family housing to 33.[6]

[6] Marx, Paul. Jim Rouse: Capitalist/Idealist. University Press of America, 2007. p. 133

iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates, and increased homicide rates.

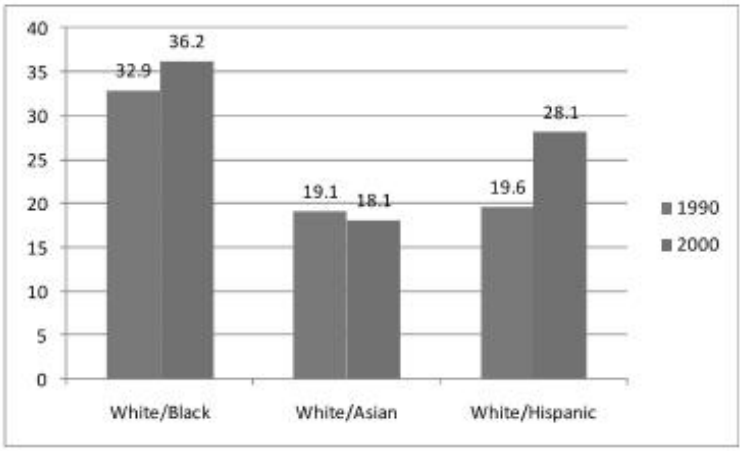
The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index is a statistical measure that describes the interaction between two population groups. It does not consider the patterns of segregation (whether, for example, an index of 0.50 means that an area is divided equally into 100% White and 100% Black halves or that every other census tract is 100% White or 100% Black). It also does not consider the reasons for segregation. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[7] The index is typically interpreted as the percentage of the minority population that would have to move in order for a community or neighborhood to achieve full integration.[8]

In 1990, Howard County had a White/Black dissimilarity index of 32.9 as illustrated in Figure 1-4. By 2000, CensusScope reported that the index had increased to 36.2 indicating a segregating population. An even sharper increase was noted between Whites and Hispanics with the dissimilarity index rising significantly from 19.6 to 28.1. The White/Asian index decreased from 19.1 to 18.1.

[7] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum \mathbf{ABS}\ [(b/B)-(a/A)]$, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

[8] According to Douglas S. Massey, an index under 30 is low, between 30 and 60 is moderate, and above 60 is high. See Massey, "Origins of Economic Disparities: The Historical Role of Housing Segregation," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 41-42.

Figure 1-4
Howard County Dissimilarity Indices, 1990 and 2000



Of the 11 cities (with populations exceeding 25,000) and the counties in Maryland for which dissimilarity indices were determined, Howard County ranks at the lower end of the scale in segregation of the Black population. The County's 2000 dissimilarity index of 36.2 for White persons and Black persons ranked ninth out of 11 on the scale of segregation, and indicated that White persons and Black persons in Howard County were significantly more integrated than other communities across Maryland. Howard County is the most integrated of the five units of government included in this report.

Figure 1-5
Maryland Dissimilarity Index Rankings, 2000

Geography	Rank	Black Population	White Population	Total Population	Dissimilarity Index
Baltimore city	1	418,951	205,982	651,154	71.3
Baltimore County	2	149,976	561,624	754,292	64.9
Annapolis city	3	11,205	21,137	35,838	56.2
Bowie city	4	15,339	30,709	50,269	49.2
Harford County	5	19,831	189,489	218,590	49.1
Anne Arundel County	6	65,280	397,893	489,656	47.6
Rockville city	7	4,200	29,342	47,388	43.6
Gaithersburg city	8	7,457	25,818	52,613	39.6
Howard County	**9**	**35,412**	**183,886**	**247,842**	**36.2**
Hagerstown city	10	3,661	31,244	36,687	34.9
Frederick city	11	7,641	39,568	52,767	32.3

Source: 2000 Census, CensusScope, Mullin & Lonergan Associates

OBSERVATION: Howard County had a dissimilarity index of 36.2 for Whites/Blacks in 2000, making it the most integrated of the five units of government included in this report.

Map 4 on the following page compares the percentage of Black residents by census tract in Howard County in 1960, 1980, and 2000. The map shows that Blacks have migrated into the central and eastern portions of the County over the last 50 years.

C. The Relationship between Protected Class Status and Income

i. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan. A review of median household income reveals a contrast between Whites and minority households in Howard County. Black households, with the lowest median income of $76,003, had earnings equivalent to only 69% that of White households. Hispanics fared only slightly better with a median income equivalent to 73% of White households. Asians had a median income of $98,400, which was equivalent to 90% of the income for Whites.

It is worth noting that ACS data, unlike decennial Census data, is based on a sample size commonly prone to considerable error margins when evaluating trends among population categories such as race and ethnicity. In this case, the ACS estimates that 3,212 of the 43,880 Black residents of Howard County were in poverty in 2008 (7.3%) with an error margin of +/- 1,088, or +/- 2.4%. Statistical analysis of the margin of error proves that the poverty rate between Blacks and Asians cannot not be declared to be significantly different at a confidence level of 90%. ACS data is valuable as the most recent source of such information available (and currently the only Census Bureau source for socio-economic data, given the elimination of the Census long form), but it should be considered with this limitation in mind.

Blacks, with the lowest income levels, experienced poverty at more than twice the rate of Whites. Hispanics, however, had the highest poverty rate among all households at more than twice the overall County rate.

Figure 1-6
Median Household Income and Poverty Rates by Race/Ethnicity, 2008

	Median Household Income	Poverty Rate
Howard County	**$101,710**	**4.1%**
Whites	$109,478	3.1%
Blacks	$76,003	7.3%
Asians	$98,400	5.3%
Hispanics	$80,221	8.3%

Source: U.S. Census Bureau, 2006-2008 American Community Survey Three Year Estimates (B19013, B19013A, B19013B, B19013D, B19013I & B17001, B17001A, B17001B, B17001D, B17001I)

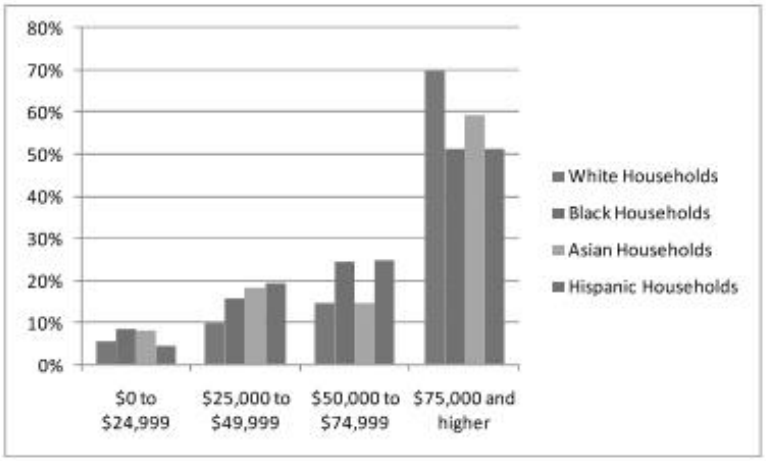
Household income was evenly distributed among Whites, Blacks and Asians below the $25,000 level, as illustrated in Figure 1-7. Within the $25,000 to $49,999 income range, however, slightly more Blacks and twice as many Asians as Whites could be found. Rates also were comparable in the $50,000 to $74,999 range between Whites and Asians, while significantly more Black households had incomes within this range. At the upper end of the spectrum, 70% of all White households reported incomes of $75,000 or higher compared to 59.2% of Asians and slightly more than half of all Black households.

Figure 1-7
Household Income Distribution by Race/Ethnicity, 2008

	Total	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
Howard County	**99,665**	**6,490**	**6.5%**	**11,783**	**11.8%**	**16,298**	**16.4%**	**65,094**	**65.3%**
White Households	69,661	4,005	5.7%	6,827	9.8%	10,257	14.7%	48,572	69.7%
Black Households	16,421	1,405	8.6%	2,568	15.6%	4,005	24.4%	8,443	51.4%
Asian Households	10,689	872	8.2%	1,936	18.1%	1,552	14.5%	6,329	59.2%
Hispanic Households	3,730	170	4.6%	720	19.3%	922	24.7%	1,918	51.4%

Source: U.S. Census Bureau, 2006-2008 American Community Survey Three Year Estimates (C19001, C19001A, C19001B, C19001D, C19001I)

Figure 1-8
Household Income Distribution by Race/Ethnicity, 2008



OBSERVATION: Median household incomes among Black and Hispanic households in Howard County are significantly less than among White households.

iv. Concentrations of LMI Persons

The CDBG program includes a statutory requirement that 70% of funds invested benefit low and moderate income persons. As a result, HUD provides the percentage of low and moderate income persons in each census block group for entitlements such as Howard County.

HUD data reveals that there are 29 census block groups where at least 29.8% or more of residents (for whom this rate is determined) meet the criterion for low and moderate income status.[9] These areas include Ellicott City, south of Columbia, and in the Waterloo and Savage areas. The following figure lists the LMI block groups in Howard County.

[9] The 29.8% threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in Howard County.

Figure 1-9
LMI Block Groups, 2009

			Low/Moderate Income Persons		
Neighborhood	Census Tract	Block Group	#	Universe	%
Savage	606901	4	340	1,063	32.0%
	606901	2	356	868	41.0%
	606902	5	1,227	4,111	29.8%
	606902	1	1,165	2,091	55.7%
Elkridge	601102	3	1,503	3,840	39.1%
	601201	1	1,133	2,839	39.9%
	601201	3	161	430	37.4%
	601202	1	377	954	39.5%
	601202	2	104	289	36.0%
	601202	4	922	2,651	34.8%
Columbia	605401	1	1,179	3,743	31.5%
	605401	2	190	627	30.3%
	605402	1	629	1,372	45.8%
	605402	2	776	2,461	31.5%
	605503	2	1,112	2,945	37.8%
	605503	3	1,056	2,049	51.5%
	605601	2	611	1,830	33.4%
	606603	1	1,236	2,947	41.9%
	606603	4	859	1,639	52.4%
	606604	1	548	1,663	33.0%
	606605	3	1,184	2,385	49.6%
	606704	2	997	2,450	40.7%
Laurel	606903	3	1,308	3,203	40.8%
	606903	4	966	2,109	45.8%
Lisbon	604002	1	328	1,067	30.7%
	602600	2	1,831	3,484	52.6%
	602800	2	1,047	2,976	35.2%
	602900	1	212	687	30.9%
	602900	2	1,143	2,857	40.0%

Source: U.S. Dept. of Housing & Urban Development

Of the 29 census block groups that qualify as LMI areas, 16 block groups are located within previously identified areas of minority or ethnic concentration. These include block groups in census tracts 6026.00, 6029.00, 6054.02, 6055.03, 6066.03, 6066.04, 6066.05, 6067.04, 6069.01, and 6069.03. Map 5 highlights the LMI block groups in Howard County.

OBSERVATION: Several LMI areas around Ellicott City, Columbia, Waterloo and Savage were noted to also be areas of minority concentration.

v. Disability and Income

The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional disability, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural changes (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Howard County, 11.7% of the population 5 years and older reported at least one type of disability in 2000.[10]

According to the National Organization on Disability, a significant income gap exists for persons with a disability, given their lower rate of employment. In Howard County, persons with a disability were three times more likely to be living in poverty than persons without a disability. In 2000, among persons with a disability, 9.8% lived below the level of poverty. However, among persons without a disability, only 3.1% lived below poverty.[11]

The Howard County Department of Citizen Services provides services related to disabilities, including information, case management, referral and assistance for housing, transportation, employment and improved access to public facilities. In a questionnaire completed as part of the AI, the Department reported that private landlords, apartment management firms and condominium associations could generally improve their understanding of their responsibilities under state, federal and local fair housing statutes. Particularly, the Department noted that condo associations "tend not to want to provide reasonable accommodations such as curb cuts, adequate number of parking spaces, etc," while those managing apartment complexes "do not always understand the need" for reasonable accommodations. The primary fair housing need among persons with disabilities, according to this organization, is information regarding the availability of accessible units. There is also a need for more transit options, as persons without their own transportation are constrained to limited areas of Howard County and thusly face limitations in regard to the jobs and services they can access.

OBSERVATION: Persons with disabilities were three times more likely to live in poverty than persons without disabilities. In Howard County, 9.8% of persons with a disability were living in poverty compared to 3.1% of persons without a disability.

[10] U.S. Census Bureau, Census 2000 (SF-3, PCT34)
[11] U.S. Census Bureau, Census 2000 (SF-3, PCT34)

vi. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights Act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Female-headed households have remained relatively consistent around 9% of all households since 1990; female-headed households with children have increased slightly from 4.6% to 6% in 2000 before falling back to 5.8%. Married couple family households with children have remained stable at around 33% for almost 20 years.

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of landlords to rent their units to families with children. In Howard County in 2000, female-headed households with children accounted for 46.9% of all families living in poverty compared to only 7.9% of all families who were living above the level of poverty.[12]

Figure 1-10
Households by Type and Presence of Children, 1990-2008

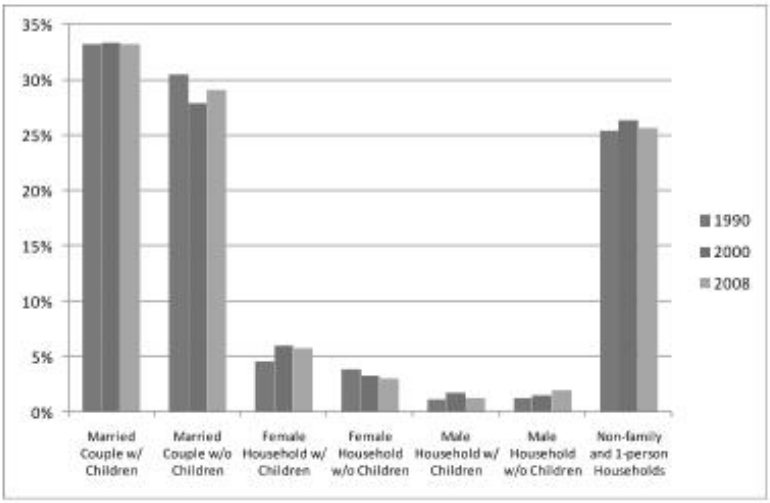
	1990		2000		2008	
	#	%	#	%	#	%
Howard County	68,657	100.0%	90,102	100.0%	99,665	100.0%
Family Households	51,232	74.6%	66,355	73.6%	74,101	74.4%
Married-couple family	**43,705**	**63.7%**	**55,067**	**61.1%**	**62,039**	**62.2%**
With Children	**22,802**	**33.2%**	**29,981**	**33.3%**	**33,110**	**33.2%**
Without Children	20,903	30.4%	25,086	27.8%	28,929	29.0%
Female-Headed Households	**5,809**	**8.5%**	**8,340**	**9.3%**	**8,813**	**8.8%**
With Children	**3,178**	**4.6%**	**5,415**	**6.0%**	**5,791**	**5.8%**
Without Children	2,631	3.8%	2,925	3.2%	3,022	3.0%
Male-Headed Household	1,718	2.5%	2,948	3.3%	3,249	3.3%
With Children	**813**	**1.2%**	**1,565**	**1.7%**	**1,312**	**1.3%**
Without Children	905	1.3%	1,383	1.5%	1,937	1.9%
Non-family and 1-person Households	17,425	25.4%	23,747	26.4%	25,564	25.6%

Sources: U.S. Census Bureau, 1990 (STF3-P019); Census 2000 (SF3-P10); 2008 American Community Survey (B11001 & B11003)

OBSERVATION: Female-headed households with children accounted for 46.9% of all families living in poverty in Howard County.

[12] U.S. Census Bureau, Census 2000 (SF-3, P90)

Figure 1-11
Households by Type and Presence of Children, 1990-2008



vii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in Howard County revealed that 16.6% of Howard County residents in 2007 were foreign-born or born outside of the U.S. in Puerto Rico or on U.S. island areas.[13]

Among families with children who were living with foreign-born parents, 14.4% were living in households with incomes under 200% of the poverty level.[14]

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers.

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. According to the 2006-2008 reports, the five languages with the highest number of persons who speak English less than "very well" in Howard County are

[13] U.S. Census Bureau, 2008 American Community Survey (C05002)
[14] U.S. Census Bureau, 2008 American Community Survey (C05010)

Korean, Spanish, Chinese, Urdu (spoken in Pakistan), and Hindi. To determine whether translation of vital documents is required, a HUD entitlement community must calculate the number of LEP persons in a single language group who are likely to qualify for and be served by the Urban County's programs.

Figure 1-12
Language Spoken at Home by Ability to Speak English in Howard County, 2008

Language Group	Number of LEP Persons (% of total population)
Korean	**4,566 1.8%**
Spanish	**4,335 1.7%**
Chinese	**2,120 0.8%**
Urdu	702 0.3%
Hindi	584 0.2%

Source: U.S. Census Bureau, 2006-08 American Community Survey Three-Year Estimates (B16001)

In Howard County, Census data revealed there are potentially three languages with significant numbers of native speakers who also speak English less than "very well." These languages include Korean, Spanish, and Chinese. For each of these languages, the number of LEP persons exceeds 1,000. For this reason, the County should perform a four-factor analysis to determine the extent to which the translation of vital documents is warranted.[15] (The term "vital document" refers generally to any publication that is needed to gain access to the benefits of a program or service.) Although there is no requirement to develop a Language Access Plan, HUD entitlement communities are responsible for serving LEP persons in accordance with Title VI of the Civil Rights Act of 1964. The obligation to translate vital documents would also extend to the Housing Commission and all sub-recipients of the Urban County. The County's LEP program, reviewed later in the AI, addresses these concerns.

OBSERVATION: There are three language groups – Korean, Spanish, and Chinese – with more than 1,000 persons identified as speaking English less than very well.

[15] The four-factor analysis is detailed in the Federal Register dated January 22, 2007.

viii. Protected Class Status and Unemployment

Blacks are twice as likely to be unemployed than Whites in Howard County. Overall unemployment was 3.6% in 2008 for the civilian labor force, a rate significantly lower than the State rate of 5.4%. Unemployment among Whites was 3.1%; among Blacks, the rate was 6.7%. Females were also more likely to be unemployed than males with rates of 4.1% and 3.1%, respectively. Asians experienced an unemployment rate of 3.8%, the lowest among all races analyzed. The population size of Hispanics was too small to calculate this characteristic. Again, it is worth noting that local-level ACS data for individual racial and ethnic categories, even when it is reliable enough to meet Census reporting thresholds, can be subject to wide error margins.

Figure 1-13
Civilian Labor Force, 2008

	Maryland Total	%	Howard County Total	%
Total Civilian Labor Force (CLF)	**3,118,499**	**100.0%**	**159,084**	**100.0%**
Employed	2,951,517	94.6%	153,404	96.4%
Unemployed	166,982	5.4%	5,680	3.6%
Male CLF	**1,583,022**	**50.8%**	**84,032**	**52.8%**
Employed	1,495,322	94.5%	81,461	96.9%
Unemployed	87,700	5.5%	2,571	3.1%
Female CLF	**1,535,477**	**49.2%**	**75,052**	**47.2%**
Employed	1,456,195	94.8%	71,943	95.9%
Unemployed	79,282	5.2%	3,109	4.1%
White CLF	**1,920,280**	**61.6%**	**108,114**	**68.0%**
Employed	1,844,199	96.0%	104,807	96.9%
Unemployed	76,081	4.0%	3,307	3.1%
Black CLF	**902,248**	**28.9%**	**28,953**	**18.2%**
Employed	826,754	91.6%	27,010	93.3%
Unemployed	75,494	8.4%	1,943	6.7%
Asian CLF	**163,472**	**5.2%**	**17,653**	**11.1%**
Employed	157,535	96.4%	16,974	96.2%
Unemployed	5,937	3.6%	679	3.8%
Hispanic CLF	**203,296**	**6.5%**	**—**	**—**
Employed	189,879	93.4%	—	—
Unemployed	13,417	6.6%	—	—

Note: The sample size of the Hispanic population was too small and not provided by Census.
Source: U.S. Census Bureau, 2008 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

OBSERVATION: Unemployment in Howard County was more common among Black residents than White residents.

C. The Housing Market

i. Housing Inventory

Like its neighboring counties in the Baltimore metropolitan area, Howard County has experienced significant new development since 1990. The County's housing inventory has increased 47.5% from 72,583 to 107,038 units. This net increase was equivalent to an annual average increase of 1,914 units over the past 18 years. About 1,800 new housing units have been built annually for the last several decades.

Higher rates of growth occurred in the north central part of the County, in the central area near Clarksville, around Columbia and Guilford, and in western Howard County. Of these areas, only Guilford and Clarksville were previously noted as impacted areas of minority concentrations. Overall, 33.4% of the County's housing growth occurred in areas of racial and/or ethnic concentration. Of the total gain in units across the County, (34,553, a net gain of 34,455), 11,559 units were added in one of the 13 concentrated census tracts. This is on par with the distribution of housing units overall in 2009, as 34.7% of 107,038 total units were located in those 13 tracts.

The distribution of housing development in the County is affected to some extent by policy factors, including the following:

- Columbia was planned in the 1960s by the Rouse Company as a community comprised of 10 self-sustaining villages, each of which contains a variety of housing styles and complementary land uses – shopping centers, recreation and community centers, for example. One intention of Columbia's design was to mitigate segregation. The community is not incorporated, but is overseen by the Columbia Association, which functions similarly to a homeowners' association, and has a zoning ordinance.
- The Adequate Public Facilities Ordinance (APFO), effective since 1992, promotes orderly growth by synchronizing new development with the availability of public roads, schools and other infrastructure. The ordinance requires development projects to pass three tests of adequacy as a condition of subdivision or site development plan approval, unless exempt by law, related to housing allocations, schools and roads. The County Department of Planning and Zoning maintains a housing unit allocation chart, revised annually, to indicate the projected number of housing unit allocations to be granted in each planning area based on longer-range targets in the 2000 General Plan. Once a project passes APFO tests, the Department monitors the processing of all subsequent plans to ensure that the applicant applies with all approval conditions and plan processing deadlines.
- Relative to schools, the APFO requires maintenance of a chart designating schools as open or closed based on school capacities and enrollment projections. The Board of Education of Howard County considers school attendance area adjustments as often as is made

necessary by changes in school facility plans, program capacity, demographic patterns or unforeseen circumstances in which adjustment would promote efficiency or provide for the welfare of students.

The following chart highlights the trends in housing inventory by census tract in Howard County. Map 6 illustrates the net change in housing inventory from 1990 to 2009.

OBSERVATION: The County's housing inventory increased 47.5% between 1990 and 2009, from 72,583 to 107,038 units.

Figure 1-14
Trends in Housing Inventory, 1990-2009

Neighborhood	Census Tract	1990 #	1990 % of Total Housing Units	2000 #	2000 % of Total Housing Units	2009 #	2009 % of Total Housing Units	Change 1990-2009 #	Change 1990-2009 %
Howard County		**72,583**	**100.0%**	**92,818**	**100.0%**	**107,038**	**100.0%**	**34,455**	**47.5%**
Clarksville	6051.01	2,010	2.8%	2,635	2.8%	2,943	2.7%	933	46.4%
West Friendship	6030	2,514	3.5%	3,673	4.0%	5,356	5.0%	2,842	113.0%
Savage	6067.03	1,167	1.6%	2,801	3.0%	3,184	3.0%	2,017	172.8%
	6069.01	1,551	2.1%	1,937	2.1%	1,984	1.9%	433	27.9%
	6069.02	2,659	3.7%	3,849	4.1%	4,400	4.1%	1,741	65.5%
Elkridge	6011.01	753	1.0%	2,660	2.9%	3,653	3.4%	2,900	385.1%
	6011.02	3,068	4.2%	4,741	5.1%	4,987	4.7%	1,919	62.5%
	6012.01	1,631	2.2%	2,561	2.8%	2,764	2.6%	1,133	69.5%
	6012.02	1,592	2.2%	1,945	2.1%	2,790	2.6%	1,198	75.3%
Columbia	6051.02	1,606	2.2%	1,902	2.0%	2,446	2.3%	840	52.3%
	6054.01	2,259	3.1%	2,495	2.7%	2,612	2.4%	353	15.6%
	6054.02	2,351	3.2%	2,657	2.9%	3,731	3.5%	1,380	58.7%
	6055.01	153	0.2%	1,789	1.9%	2,588	2.4%	2,435	1591.5%
	6055.02	1,749	2.4%	2,155	2.3%	2,206	2.1%	457	26.1%
	6055.03	2,391	3.3%	2,537	2.7%	2,879	2.7%	488	20.4%
	6056.01	2,539	3.5%	2,749	3.0%	2,457	2.3%	-82	-3.2%
	6056.02	2,433	3.4%	2,711	2.9%	3,564	3.3%	1,131	46.5%
	6066.01	1,077	1.5%	1,076	1.2%	1,084	1.0%	7	0.6%
	6066.03	3,054	4.2%	3,054	3.3%	3,148	2.9%	94	3.1%
	6066.04	1,473	2.0%	1,521	1.6%	1,594	1.5%	121	8.2%
	6066.05	3,285	4.5%	3,711	4.0%	3,710	3.5%	425	12.9%
	6067.01	940	1.3%	966	1.0%	970	0.9%	30	3.2%
	6067.04	2,550	3.5%	2,746	3.0%	2,973	2.8%	423	16.6%
	6067.05	720	1.0%	771	0.8%	793	0.7%	73	10.1%
	6068.03	2,131	2.9%	2,397	2.6%	2,443	2.3%	312	14.6%
	6068.04	1,326	1.8%	1,326	1.4%	1,314	1.2%	-12	-0.9%
Laurel	6068.02	2,013	2.8%	2,529	2.7%	3,361	3.1%	1,348	67.0%
	6069.03	3,210	4.4%	3,801	4.1%	4,153	3.9%	943	29.4%
Lisbon	6040.01	1,488	2.1%	1,862	2.0%	1,951	1.8%	463	31.1%
	6040.02	1,397	1.9%	1,906	2.1%	2,378	2.2%	981	70.2%
Ellicott City	6021	1,480	2.0%	2,147	2.3%	2,425	2.3%	945	63.9%
	6022	2,286	3.1%	2,879	3.1%	3,074	2.9%	788	34.5%
	6023.02	1,187	1.6%	1,787	1.9%	2,410	2.3%	1,223	103.0%
	6023.03	892	1.2%	1,153	1.2%	1,225	1.1%	333	37.3%
	6023.04	1,397	1.9%	1,494	1.6%	1,545	1.4%	148	10.6%
	6023.05	1,198	1.7%	1,260	1.4%	1,265	1.2%	67	5.6%
	6023.06	1,817	2.5%	1,967	2.1%	2,102	2.0%	285	15.7%
	6026	1,919	2.6%	2,181	2.3%	2,967	2.8%	1,048	54.6%
	6027	549	0.8%	852	0.9%	1,632	1.5%	1,083	197.3%
	6028	1,460	2.0%	1,948	2.1%	2,144	2.0%	684	46.8%
	6029	1,304	1.8%	1,687	1.8%	1,833	1.7%	529	40.6%

Source: DemographicsNow

ii. Types of Housing Units

Of the 92,818 housing structures in 2000, 74.7% were single family units. Most of the remaining units were in multi-family properties of all sizes. Higher concentrations of multi-family units were noted in several minority impacted areas located southwest of Columbia and around Savage. Almost 62% of the multi-family housing units located in Howard County were located in the following ten census tracts: 6011.02, 6026.00, 6029.00, 6054.01, 6054.02, 6056.01, 6066.03, 6066.05, 6069.02, and 6069.03. Six of these census tracts are minority or ethnically impacted areas. In addition, all of these census tracts contain at least one LMI block group within them.

The following chart highlights the trends housing units per structure in Howard County in 2000. Map 7 shows the percentage of multi-family units by census tract in the County.

Figure 1-15
Housing Units in Structures, 2000

Neighborhood	Census Tract	Total Units	Single-family units (detached & attached)	Multi-family units					Mobile home	Boat, RV, van, etc.
				2 to 4	5 to 9	10 to 19	20 or more	Total		
Howard County		**92,818**	**69,313**	**1,527**	**5,899**	**9,739**	**4,499**	**21,664**	**1,803**	**38**
Clarksville	6051.01	2,635	2,601	7	0	0	0	7	27	0
West Friendship	6030	3,673	3,535	15	0	115	8	138	0	0
Savage	6067.03	2,801	2,193	23	133	348	104	608	0	0
	6069.01	1,937	1,283	23	43	244	100	410	244	0
	6069.02	3,849	2,440	144	195	843	49	1,231	178	0
Elkridge	6011.01	2,660	2,614	28	0	0	0	28	18	0
	6011.02	4,741	2,441	108	303	931	234	1,576	714	10
	6012.01	2,561	1,775	55	60	465	149	729	57	0
	6012.02	1,945	1,282	0	22	270	32	324	339	0
Columbia	6051.02	1,902	1,889	5	0	0	0	5	4	4
	6054.01	2,495	934	109	598	688	166	1,561	0	0
	6054.02	2,657	1,346	102	383	335	491	1,311	0	0
	6055.01	1,789	1,781	0	0	0	0	0	0	8
	6055.02	2,155	1,672	0	57	381	45	483	0	0
	6055.03	2,537	1,665	66	381	308	117	872	0	0
	6056.01	2,749	1,449	132	136	624	408	1,300	0	0
	6056.02	2,711	2,023	17	77	403	191	688	0	0
	6066.01	1,076	1,076	0	0	0	0	0	0	0
	6066.03	3,054	1,802	91	344	529	288	1,252	0	0
	6066.04	1,521	1,116	16	110	235	44	405	0	0
	6066.05	3,711	2,425	50	417	546	273	1,286	0	0
	6067.01	966	960	6	0	0	0	6	0	0
	6067.04	2,746	2,290	0	157	10	311	478	6	0
	6067.05	771	685	0	17	8	33	58	0	0
	6068.03	2,397	1,443	49	325	362	214	950	0	0
	6068.04	1,326	990	0	126	170	44	340	0	0
Laurel	6068.02	2,529	2,529	0	0	0	0	0	0	0
	6069.03	3,801	2,485	182	241	619	99	1,141	175	0
Lisbon	6040.01	1,862	1,819	0	0	10	0	10	33	0
	6040.02	1,906	1,889	9	0	0	0	9	8	0
Ellicott City	6021	2,147	2,140	0	0	7	0	7	0	0
	6022	2,879	2,228	48	193	340	70	651	0	0
	6023.02	1,787	1,547	11	45	164	20	240	0	0
	6023.03	1,153	1,150	3	0	0	0	3	0	0
	6023.04	1,494	1,487	7	0	0	0	7	0	0
	6023.05	1,260	1,245	0	7	0	0	7	0	8
	6023.06	1,967	1,447	44	130	207	131	512	0	8
	6026	2,181	690	27	857	41	566	1,491	0	0
	6027	852	819	13	0	10	17	40	0	0
	6028	1,948	1,702	104	47	40	48	239	0	0
	6029	1,687	426	33	495	486	247	1,261	0	0

Source: U.S. Census Bureau, Census 2000 (SF3-H30)

According to the 2009 Howard County Rental Survey, the County's rental housing stock includes over 22,000 rental units, including units in both multi-family communities and private homes available for rent.[16] The stock of multi-family housing in the County includes 16,237 market-rate rental units.

Slightly more than half of these units, or 8,258 units, are located in Columbia neighborhoods. Outside of Columbia, the Laurel neighborhood offers the largest number of market-rate multi-family rental units with 2,890 units, followed by Normandy with 2,816 units.

The study states that there are ten affordable housing communities with a total of 1,199 units that are targeted to lower income households earning at or below 30, 40, 50, and 60 percent of the Area Median Gross Income (AMGI). Eighty-two percent (82%) of the subsidized units in the County are located in Columbia.

Updated data available from the 2010 American Community Survey estimates report 27,784 renter-occupied units in Howard County (+/- 2,336), 3,987 of which (14.3%) are in single-family detached structures, 13,975 of which (50.3%) are in buildings containing 10 or more units. ACS calculations do not determine which of these units are affordable at given income levels.

> OBSERVATION: Multi-family rental housing in Howard County, both market rate and subsidized units, is located most heavily in and around Columbia.

iii. Protected Class Status and Homeownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[17]

Historically in Howard County, minorities are less likely to own their homes than Whites. Overall, the rate of homeownership in the County was 73.8% in 2000. However, only 57% of Blacks owned their homes compared to 78.2% of Whites. For Hispanics, the rate was even lower at 55.2%. Asian households had the second-highest rate at 66.8%, but this was still lower than Whites. There were six census tracts in which all Black, Asian and Hispanic households achieved a home ownership rate of 100%.

[16] The 2009 Howard County Rental Survey was prepared for the Howard County Department of Housing and Community Development by the Real Property Research Group.

[17] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p.82.

OBSERVATION: Homeownership rates are lower among Black and Hispanic households than among White households in the County.

The following chart provides information on the number of Black, Asian, Hispanic, and White homeowners by census tract throughout Howard County.

Figure 1-16
Housing Tenure by Race/Ethnicity, 2000

Neighborhood	Census Tract	White homeowners		Black homeowners		API homeowners		Hispanic homeowners	
		#	%	#	%	#	%	#	%
Howard County		**54,024**	**78.2%**	**7,423**	**57.0%**	**3,738**	**66.8%**	**1,157**	**55.2%**
Clarksville	6051.01	2,227	94.5%	101	100.0%	105	93.8%	8	53.3%
West Friendship	6030	3,070	95.2%	144	100.0%	127	100.0%	22	100.0%
Savage	6067.03	1,392	85.2%	586	76.7%	170	87.2%	35	52.2%
	6069.01	851	67.9%	402	73.4%	17	58.6%	16	55.2%
	6069.02	1,718	65.0%	289	38.0%	98	47.6%	46	47.4%
Elkridge	6011.01	2,009	94.5%	241	96.4%	185	100.0%	33	76.7%
	6011.02	2,779	75.2%	228	51.7%	168	63.6%	92	83.6%
	6012.01	1,571	74.0%	149	81.4%	46	52.3%	23	53.5%
	6012.02	1,271	82.8%	122	74.4%	11	64.7%	27	67.5%
Columbia	6051.02	1,569	93.9%	79	100.0%	77	100.0%	69	100.0%
	6054.01	782	45.8%	143	32.8%	55	34.4%	49	35.8%
	6054.02	1,183	69.0%	377	60.1%	32	47.8%	11	17.2%
	6055.01	1,311	96.5%	108	100.0%	276	100.0%	40	100.0%
	6055.02	1,139	75.5%	262	63.7%	97	69.3%	50	84.7%
	6055.03	1,080	74.7%	279	39.2%	65	45.1%	19	22.6%
	6056.01	975	49.9%	210	44.2%	72	51.8%	44	44.4%
	6056.02	1,370	70.9%	278	56.4%	85	53.5%	21	45.7%
	6066.01	730	94.2%	221	89.5%	31	100.0%	7	100.0%
	6066.03	1,116	66.8%	411	44.2%	75	50.3%	56	33.9%
	6066.04	776	82.2%	292	67.7%	55	69.6%	27	100.0%
	6066.05	1,479	66.5%	500	51.7%	115	42.9%	37	42.5%
	6067.01	824	95.6%	48	100.0%	14	48.3%	17	100.0%
	6067.04	1,380	73.1%	405	60.3%	77	73.3%	18	75.0%
	6067.05	478	88.2%	84	69.4%	21	61.8%	17	73.9%
	6068.03	1,224	67.5%	147	47.1%	68	48.6%	28	56.0%
	6068.04	724	69.1%	58	34.9%	40	50.6%	17	56.7%
Laurel	6068.02	2,045	95.1%	101	88.6%	194	97.0%	26	78.8%
	6069.03	1,617	66.9%	395	43.0%	100	57.1%	77	47.0%
Lisbon	6040.01	1,607	92.8%	69	87.3%	11	100.0%	19	65.5%
	6040.02	1,653	93.2%	9	100.0%	24	100.0%	39	84.8%
Ellicott City	6021	1,828	98.2%	102	100.0%	153	100.0%	18	100.0%
	6022	1,909	78.4%	87	73.7%	139	54.7%	19	47.5%
	6023.02	1,207	86.5%	105	53.8%	96	81.4%	22	100.0%
	6023.03	808	94.3%	20	100.0%	248	100.0%	7	58.3%
	6023.04	1,231	98.1%	30	66.7%	128	100.0%	8	100.0%
	6023.05	1,042	96.3%	62	100.0%	99	100.0%	9	100.0%
	6023.06	1,301	82.9%	62	74.7%	98	49.5%	25	100.0%
	6026	424	28.9%	51	18.3%	55	17.5%	11	16.4%
	6027	748	95.0%	25	100.0%	15	100.0%	15	100.0%
	6028	1,260	82.5%	82	47.7%	143	88.3%	25	44.6%
	6029	316	27.7%	59	27.1%	53	26.2%	8	13.6%

Source: U.S. Census Bureau, Census 2000 (SF3-H11, H12)

iv. The Tendency of Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In Howard County, minority households were far more likely than White households to live in families consisting of three or more persons. Over 80% of Hispanic family households reported three or more family members living together. Asian/Pacific Islanders and Blacks also lived in larger families than Whites.

Figure 1-17
Families with Three or More Persons, 2000

	Families with Three or More Persons	
	#	%
Howard County	**42,397**	**63.9%**
White	31,242	61.8%
Black	6,179	66.2%
Asian/Pacific Islander	3,576	75.8%
Hispanic	1,337	80.2%

Source: U.S. Census Bureau, Census 2000 (SF4-PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. According to 2010 American Community Survey estimates, 24.1% of the rental housing stock in Howard County contained three or more bedrooms compared to 87% of the owner housing stock.[18]

Figure 1-18
Housing Units by Number of Bedrooms, 2000

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
Size of Housing Units	Number of Units	% of Total Housing Units	Number of Units	% of Total Housing Units
0-1 bedroom	8,171	9.1%	1,302	1.4%
2 bedrooms	9,392	10.4%	6,448	7.2%
3 or more bedrooms	**6,066**	**6.7%**	**58,664**	**65.2%**
Howard County	23,629	26.2%	66,414	73.8%

Source: U.S. Census Bureau, Census 2000 (SF3-H42)

[18] ACS reported that 67,482 of 77,574 total owner units (+/- 2,451) had three or more bedrooms, and that 6,703 of 27,784 rental units (+/- 2,336) had three or more bedrooms.

v. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

The median housing value in Howard County increased almost 63% since 1990, after adjusting for inflation.[19] This was in stark contrast to the median gross rent, which increased only 15.3% during the same period. By comparison, real household income increased only 8.7%.

Figure 1-19
Trends in Median Housing Value, Rent and Household Income, 1990-2008

Howard County	1990	2000	2008	% Change 1990-2008
Median Owner-Occupied Housing Value				
Actual Dollars	$165,400	$206,300	$467,700	182.8%
2008 Inflation-Adjusted Dollars	$287,186.00	$266,608.70	$467,700.00	62.9%
Median Gross Rent				
Actual Dollars	$680	$879	$1,361	100.1%
2008 Inflation-Adjusted Dollars	$1,180.69	$1,135.96	$1,361.00	15.3%
Median Household Income				
Actual Dollars	$54,348	$74,167	$102,540	88.7%
2008 Inflation-Adjusted Dollars	$94,365.22	$95,848.61	$102,540.00	8.7%

Sources: U.S. Census Bureau, 1990 Census (STF3-P080A, H043A, H061A), Census 2000 (SF3-P53, H63, H76), 2008 American Community Survey (B19013, B25064, B25077); Calculations by Mullin & Lonergan Associates, Inc.

OBSERVATION: Median housing value in Howard County increased 63% between 1990 and 2008 while real household income grew only 8.7%.

a. Rental Housing

In addition to rental rates outpacing gains in income, Howard County experienced a loss of affordable rental housing units between 2000 and 2008, which would include units for which rent costs increased as well as those physically lost from the housing inventory. The number of units renting for less than $500/month declined by almost 700 (-38.4%). Units renting for $500 to $699/month decreased by 2,430 (-80.1%); units renting for $700 to $999/month also declined by over 8,700 units (-80.5%). By comparison, units renting for $1,000/month or more nearly tripled during the same period.

[19] Housing value is the Census respondent's estimate of how much the property (house and lot, mobile home and lot, or condominium unit) would sell for if it were for sale. This differs from the housing sales price which is the actual price that the house sold for.)

Figure 1-20
Loss of Affordable Rental Housing Units, 2000-2008

Units Renting for:	2000	2008	Change 2000-2008 #	Change 2000-2008 %
Less than $500	1,781	1,097	-684	-38.4%
$500 to $699	3,032	602	-2,430	-80.1%
$700 to $999	10,907	2,122	-8,785	-80.5%
$1,000 or more	7,687	20,581	12,894	167.7%
Howard County	23,407	24,402	995	4.3%

Sources: U.S. Census Bureau, Census 2000 (SF3-H62), 2008 American Community Survey (B25063)

The National Low Income Housing coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each county in the U.S. for 2009. In Howard County, the current Fair Market Rent (FMR) for a two-bedroom apartment is $1,037. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $3,457 monthly or $41,480 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $19.94.

In Howard County and across Maryland, a minimum wage worker earns an hourly wage of $7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 110 hours per week, 52 weeks per year. Or, a household must include 2.75 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Howard County, the estimated average hourly wage for a renter is $15.73. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 51 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.3 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

OBSERVATION: To afford a two-bedroom apartment in Howard County at the fair market rent of $1,037 without spending more than 30% of income on housing, a household would have to earn $41,480 annually, a housing wage of $19.94 per hour. The estimated average hourly wage for a Howard County renter is $15.73.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Howard County and throughout Maryland. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $868.

MULLIN & LONERGAN ASSOCIATES

According to the 2009 Howard County Rental Survey, market rate two-bedroom units in Columbia are renting at a weighted average rate of $1,310 per month for a 1,036 square-foot unit.[20] In areas outside Columbia, the rents are slightly lower for a two-bedroom unit at $1,260 per month for 1,017 square feet.

On average, one-bedroom subsidized units rent for $779 versus a two-bedroom subsidized unit which rents for $1,086.

The median rent for scattered-site rental units in Howard County is $1,535. The average scattered-site unit rent in Columbia is $1,578 while for units outside Columbia it was slightly lower at $1,538.

OBSERVATION: Individuals whose sole source of income is a $674 monthly SSI check cannot afford to rent a one-bedroom unit in Howard County at the HUD fair market rent of $868. They would also find the average rent of $779 for a subsidized one-bedroom unit to be beyond their means.

b. Sales Housing

In April 2008, HUD completed a Comprehensive Housing Market Analysis for the Baltimore MSA. This analysis explored the housing market, including both the rental and owner housing markets, for the City of Baltimore and its surrounding northern and southern suburban submarkets.

The Southern Suburbs submarket includes Anne Arundel and Howard counties. Overall, the sales market in the Southern Suburbs submarket as of April 2008 was balanced, with a vacancy rate of only 1%. However, sales activity has slowed since then. As of the 12-month period ending in March 2008, the average price of a home was $427,400 in the southern suburbs. During this same period, sales decreased to 8,650 homes, which was 24% less than during the previous 12-month period.

Since 2000, construction activity, as measured by the number of building permits issued, was 3,175 units per year. This was down from 4,250 units permitted annually in the 1990s. As of April 2008, several condominium units, 1,925 total units, were under construction. Thirty-percent (30%) of these units were located in Howard County while the remaining units were to be built in Anne Arundel County. Demand forecasts estimate a need for 8,425 new single-family homes and condos in the Southern Suburbs submarket of Baltimore.

The County has recognized the need to expand the availability of affordable housing, especially in light of the ongoing Base Realignment and Closure (BRAC) process, which will continue to significantly affect

[20] The 2009 Howard County Rental Survey was prepared for the Howard County Department of Housing and Community Development by the Real Property Research Group.

housing market dynamics across the state through 2015. As a result of this initiative, 5,400 jobs will be located to Fort George G. Meade, which will result in an estimated new housing demand for 9,793 households, 86% of which earn between $50,000 and $150,000.[21] Approximately 55% of these households are expected to locate in Anne Arundel and Howard counties.

The analysis estimated that 2,700 households – nearly half of those seeking housing in Anne Arundel and Howard counties – would be unable to find affordable housing, winding up effectively priced out of the market. This will include households with members working in professions essential to growing communities, such as teachers, public safety officers, retail workers and others who will be forced to commute to work in the County from locations where housing costs are less burdensome.

BRAC is just part of the projected substantial job growth in both Anne Arundel and Howard counties. The BRAC study threatens that without deliberate efforts on the part of the counties to create more affordable housing, the problem will worsen.

vi. Foreclosure Status

According to the 2010 midyear report from RealtyTrac, an aggregator of nationwide residential foreclosure, loan and property sales data, the state of Maryland had the 10th highest foreclosure rate among all states in June 2010 with 6,304 foreclosure filings, one for every 370 housing units. Filings include default notices, auction sale notices, and bank repossessions. This represents a 7.7% increase from May 2010 and a 103% increase from June 2009. Maryland's recently rising rates are contrary to national patterns, as filings across the U.S. fell 3% between May 2010 and June 2010 and nearly 7% from June 2009.[22]

RealtyTrac detected two trends in the national data: Fewer properties entered foreclosure proceedings as lenders exercised more aggressive short sale and loan modification actions, and more properties completed the foreclosure process as lenders worked to clear a backlog of delinquent properties.[23]

In general, rates in Maryland are comparatively low due to the survival of a competitive housing market in which those who default on mortgages can still sell properties before foreclosure. The recent surge in Maryland foreclosures follows a lull from 2008 to mid-2009 that can be attributed largely to state law changes intended to delay or prevent foreclosures. The recent increase, which is projected to continue into 2011, reflects a rising

[21] Estimates calculated by Sage Policy Group in "BRAC Impacts on Fort Meade Area Housing," October 2009.
[22] "1.65 Million Properties Receive Foreclosure Filings in First Half of 2010," RealtyTrac press release, July 15, 2010
[23] Ibid.

number of owners becoming unable to meet housing costs due to such factors as unemployment or interest increases on adjustable-rate mortgages.

HUD provides foreclosure data on more granular levels. The agency estimated the incidence of foreclosure across 18 months (January 2007 to June 2008) for counties, cities, and census tracts across the country. The data is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment, and high-cost mortgages.

According to HUD foreclosure data, Howard County's foreclosure rate during the study period was the second lowest in the entire state and the lowest in the Greater Baltimore region. There were an estimated 874 foreclosure filings for 64,302 mortgages, a rate of 1.4%.

Within the County, Columbia was estimated to have the highest number of foreclosure filings (382) during the study period, but North Laurel and Savage-Guilford had the highest estimated rates, at 2.0% each. High-cost loan rates were a strong factor in this determination, as HUD reported that 21.6% and 21.7% of mortgages originated between 2004 and 2006 in North Laurel and Savage-Guilford, respectively, had burdensome interest rates. Similarly, Columbia had a high-cost lending rate of 19% while in Elkridge the rate was 15.7%. Ellicott City, which had the lowest foreclosure rate among communities with more than 500 mortgages during the study period, had a high-cost lending rate of only 9.8%.

Figure 1-21
Residential Foreclosure Rankings by Municipality, January 2007 – June 2008

	Foreclosure Filings	Total Mortgages	Foreclosure Rate
North Laurel	134	6,538	2.0%
Savage-Guilford	76	3,720	2.0%
Columbia	382	22,073	1.7%
Elkridge	102	7,609	1.3%
Ellicott City	73	11,601	0.6%
Howard County	874	64,302	1.4%

Source: HUD NSP Foreclosure Estimates, released October 2008

In June 2010 alone, RealtyTrac reported 79 new foreclosure filings in Columbia, 28 in Ellicott City, 23 in Elkridge, and 20 in North Laurel.

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. As further explained in the private lending section of the AI, the propensity of lenders to target high-risk borrowers for expensive loans has had a larger impact on minority households than on

White households in Howard County. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

vii. Protected Class Status and Housing Problems

Lower income minority households tend to experience housing problems at a higher rate than lower income White households.[24] Among all renter households with incomes below 80% of the median family income in 2000, Hispanic households experienced the highest degree of housing problems when compared to Blacks and Whites, both renters and owners. Among renters, more than 75% of all Hispanic households reported housing problems compared to 68.3% of Whites and 66.4% of Blacks. When analyzed by household type, elderly/small households and family households were more impacted than all other household types.

Among owners, Hispanics were again most likely to live in substandard housing conditions than Blacks and Whites, defined as housing without complete plumbing and/or kitchen facilities. Overall, 86.6% of Hispanic homeowners reported housing problems compared to 75.1% of Blacks and 62.8% of Whites. Rates were comparable among family households and all other household types but lower among elderly/small household types. Although Hispanics were disproportionately affected by housing problems, the rates were high for all lower income households analyzed.

Figure 1-22
Lower Income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly 1 & 2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	% with any Housing Problem	Total	% with any Housing Problem	Total	% with any Housing Problem	Total	% with any Housing Problem
Renters								
White Non-Hispanic	5,245	68.3%	1,550	71.3%	1,690	60.1%	2,005	72.8%
Black Non-Hispanic	2,985	66.4%	325	64.6%	1,835	67.9%	825	63.6%
Hispanic	449	75.8%	55	81.8%	249	86.3%	145	55.2%
Howard County Total	**8,679**	**68.0%**	**1,930**	**70.6%**	**3,774**	**66.3%**	**2,975**	**69.8%**
Owners								
White Non-Hispanic	6,260	62.8%	2,425	44.9%	2,550	73.9%	1,285	74.3%
Black Non-Hispanic	1,304	75.1%	315	58.7%	700	81.4%	289	77.9%
Hispanic	223	86.6%	10	N/A	175	88.6%	38	100.0%
Howard County Total	**7,787**	**65.5%**	**2,750**	**46.9%**	**3,425**	**76.4%**	**1,612**	**75.8%**

Source: HUD Comprehensive Housing Affordability Strategy data

[24] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

2. Evaluation of Current Fair Housing Profile

This section provides a review of the past and current fair housing planning initiatives and the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

Citizens of Howard County receive fair housing services from a variety of organizations, including but not limited to the Howard County Human Rights Commission, the Howard County Office of Human Rights, the Maryland Commission on Human Relations, and the Greater Baltimore Community Housing Resource Board. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing, and/or work to promote a mutual understanding of diversity among residents. While some offer only referral and educational programs to the community, others concentrate their efforts in tenant/landlord issues and real estate testing.

A. Existence of Fair Housing Complaints

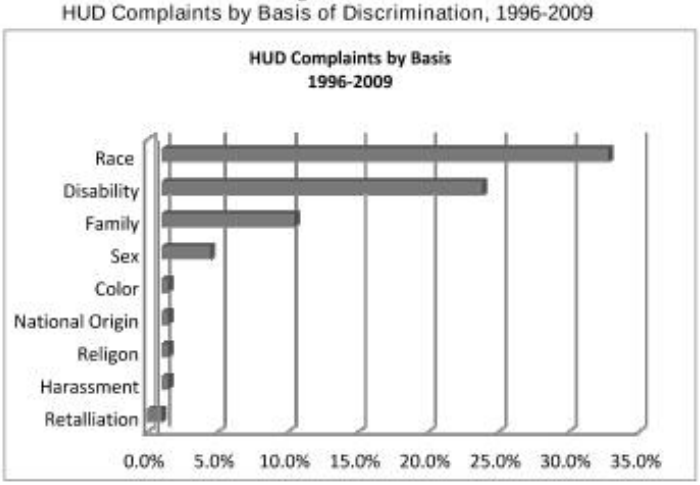
A lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to file a complaint or where to go to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

i. U.S. Department of Housing and Urban Development

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Howard County were obtained and analyzed for 1996 – 2009. As of September 2009, there were currently four open cases. In total, 67 complaints originating in the County were filed with HUD since 1996, an average of five per year. The volume of cases is steady throughout the years, with most years seeing two cases a year.

Race was the most common basis for complaint, followed by disability and familial status. A summary appears in the following chart. Many complaints were filed on multiple bases, so the chart reflects the percentage of all complaints that involved each basis.

Figure 2-1
HUD Complaints by Basis of Discrimination, 1996-2009

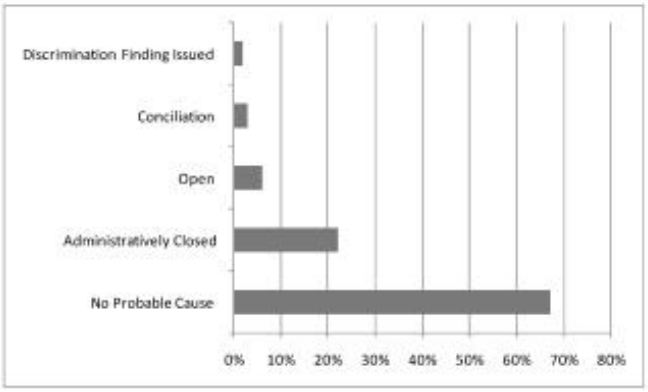


Of the 67 complaints filed since 1999, two (3%) were conciliated with a successful settlement. One of the settled cases involved familial status, while the other is unknown. Of the settled complaints, one case involved the issue of discriminatory advertising, statements, and notices. The second case involved discrimination in services and facilities relating to rental housing.

Discrimination findings were issued in one case. In 2000, a case on the basis of disability, alleging discriminatory terms, conditions, privileges and services and facilities, as well as failure to make reasonable accommodation, resulted in a FHAP judicial consent order.

Of all complaints filed, 45 (67.2%) were found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination. The remaining 15 cases (23.4%) were administratively closed, often due to complaint withdrawal before or after resolution, judicial dismissal, or the complainant's refusal to cooperate. The following chart provides a summary on how the various complaints were resolved.

Figure 2-2
Resolution of Complaints, 1996-2009



ii. Maryland Commission on Human Relations

The Maryland Commission on Human Relations is a state agency empowered to enforce Maryland's laws against discrimination in employment, housing, and public accommodations. Additionally, the agency provides related educational and outreach services, though this role has been diminished in recent years due to budgetary restrictions. According to its 2009 Annual Report, the Commission relies on more than 130 trained volunteer mediators to resolve cases before they reach the process of investigation and litigation. However, the agency continues to receive and resolve a substantial number of housing discrimination complaints.

On November 4, 2009, a formal request for data on the number and nature of fair housing complaints in Howard County was made to the Maryland Commission on Human Relations. In addition to details on all complaints filed since September 1996, the letter requested fair housing complaints where the Commission or its staff had made a finding of discrimination or probable cause, findings of noncompliance by HUD or the Commission, the number of administrative releases issued for complaints, and any other information relevant to the AI. The letter additionally explained the reason for the request.

In response, the Commission declined to provide the data requested, citing "confidentiality restrictions." The only information available for review were general statistics provided in recent Annual Reports published publicly by the Commission. According to the latest report, the agency received a total of 834 individual discrimination complaints across the state in FY 2009, 10% of which (82) were related to housing. Of these, five originated in Howard County.

B. Patterns and Trends in Fair Housing Complaints

Race continues to be the primary basis of discriminatory complaint. However, HUD data indicates that more complaints are being filed on the basis of disability. The prevalence of disability complaints, especially in recent years, is evidence that education, information, and referral regarding fair housing issues for persons with disabilities is increasingly critical.

> OBSERVATION: Most fair housing complaints filed through HUD in Howard County involved race as the basis for discrimination.

The number of HUD filings has been relatively stable during the past 13 years, from two in 1996, eight in 1997 and five in 1998 to two in 2007, four in 2008 and two through September 2009. However, 1999 was the exception with 23 filings, 22 of which resulted in no cause determination.

i. Testing

Baltimore Neighborhoods, Inc. (BNI) is a nonprofit corporation committed to fighting housing discrimination, supporting integrated communities, improving relations between tenants and landlords, providing community education, and advocating for persons with disabilities on housing accessibility issues.

As part of its mission to fight housing discrimination, BNI contracts with the City of Baltimore, Baltimore County, and Harford County to conduct discrimination testing. Currently, Howard County does not contract with any agency to conduct testing in the County.

> OBSERVATION: Currently, the County does not administer or oversee formal testing for housing discrimination.

C. Existence of Fair Housing Discrimination Suit

There are no pending fair housing discrimination suits involving Howard County.

D. Determination of Unlawful Segregation

There are no pending unlawful segregation orders involving Howard County.

3. Evaluation of Public and Private Sector Policies

The analysis of impediments is a review of barriers to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin. Policies, practices, or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments. In Maryland, protection is also extended to persons based on sexual orientation and marital status.

A. Public Sector

An important element of the analysis includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in Howard County to determine opportunities for furthering the expansion of fair housing choice.

i. Federal Entitlement Programs

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. Disruptions in the private tax credit equity markets and the decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county, and local government decision makers.

The recent Westchester County, NY settlement also reinforces the concept of creating housing choice in non-impacted areas (i.e., areas outside of concentration of minority and LMI persons) of Urban County entitlements. Westchester County violated its cooperation agreements with local units of government which prohibit expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the Urban County's action to comply with its fair housing certifications.

The Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs are the two primary HUD entitlement funds through which eligible communities can create new affordable housing opportunities in non-impacted areas. CDBG funds are used for a variety of public services, planning, street improvements, clearance, housing rehabilitation, code enforcement, and economic development initiatives. The CDBG program serves to benefit primarily low and moderate income persons in accordance with the statutory requirements of the program. In terms of housing activities, rehabilitation is most commonly financed with CDBG funds.

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including new construction, rehabilitation, homebuyer assistance, and tenant-based rental assistance.

a. Allocation of Funds

Each year, the Howard County Department of Housing and Community Development (DHCD) develops an Annual Action Plan for submission to HUD, outlining proposed activities to be undertaken using Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) entitlement funds.

As a part of the Action Plan development process, DHCD coordinates a formal RFP/open funding cycle to solicit requests for funding and to provide opportunities for the general public, local non-profits, County government agencies, and the business community to review and comment on the proposed activities detailed in the Action Plan.

The RFP/funding cycle process typically begins during the last week in November with a notice of funding availability published in local newspapers. Notices are distributed to interested groups, agencies, and organizations and are posted on human/social service agency websites. A general information session is held and Applications for Funding are distributed at that time. Applications are also made available on the department's web page and at the DHCD office. The deadline for submission of applications for both CDBG and HOME funds is usually due within 30 to 45 days from the release date.

Following the submission of applications, DHCD staff reviews each submission for eligibility and completeness. An internal (county staff) Grant Review Committee (GRC) consisting of three to five reviewers is convened and each reviewer is provided with a copy of each of the funding applications, written review instructions, and a scoring summary packet to be completed for each application reviewed. In general, the GRC is given approximately two to three weeks to review the applications. The application review process is concluded with the GRC collectively reviewing each of the applications, discussing the scoring packets, and crafting recommendations to be submitted to the department's Director and Deputy Director.

The Department's Grants Administrator reviews the GRC recommendations with the Directors as part of the Action Plan budget preparation. Additionally, the recommendations are presented to the Howard County Department of Housing and Community Development Board (HCD Board) for review and consideration. The department's final recommendations are reviewed with County administration and are moved forward as part of the County's annual budget process. During

this time, public hearings are held to receive comments on the proposed Action Plan.

The Action Plan approval process, which includes the awarding of CDBG and HOME funds to selected applicants, generally concludes at the end of April / May with the HCD Board's recommended approval followed by the Howard County Council's adoption of the Action Plan which is submitted to HUD for final approval by July 1.

b. Annual Plans and CAPERs

Entitlement communities are required to prepare Annual Action Plans in which each entity describes the activities to be undertaken with CDBG and HOME funds. At the end of each fiscal year, a Consolidated Annual Performance and Evaluation Report (CAPER) is then developed to report on the progress achieved by each entitlement in its efforts to invest CDBG and HOME funds and affirmatively further fair housing. The following narrative includes an analysis of how Howard County affirmatively furthered fair housing through their investment of these federal funds.

1) Annual Plan (2010)

The Annual Plan for 2010 included the priorities and objectives planned by Howard County in various HUD categories such as housing, homeless prevention, community development, and others. In terms of affirmatively furthering fair housing, one of the best indications of this policy being implemented is the creation of new affordable rental and sales housing units for families that are located outside of impacted areas. By creating new affordable family units outside of impacted areas, the County would be providing housing choice for LMI minorities in non-impacted areas, sometimes referred to "communities of opportunity."

Specifically, Howard County's housing objectives in its 2010 Annual Plan included the following:

- Develop four units of affordable for-sale housing under the Community Housing Assistance Initiative Program and the HOME Housing Initiative Loan Program
- Develop Jones Rd/Glens at Guilford II into 20 single-family affordable for-sale units and Glens at Guilford I into 10 single-family affordable for-sale units
- Develop 269 multi-family rental units as part of the Monarch Mills project
- Modify/rehabilitate 13 units for the elderly and disabled populations

2) CAPER (2008)

In its CAPER for 2008, Howard County reported on the activities completed and objectives met for the previous year. In terms of

affirmatively furthering fair housing choice, the following activities were noted:

- Down payment assistance was provided to six households through the County's Settlement Down Payment Loan Program
- The development of 186 affordable rental housing units, including 80 units at Parkview at Emerson in Laurel and 106 units at Ellicott Gardens in Ellicott City

Map 8 on the following page shows the geographic distribution of the County's affordable rental housing investments using CDBG and HOME funds from FY 2007 – 2008. With the exception of one new development in the North Laurel area, the majority of new affordable rental housing development in the County has occurred in areas of Black concentration in and around Waterloo, Savage, and Jonestown. Waterloo and Savage are also LMI areas.

c. Affirmative Marketing Policy

As a recipient of CDBG and HOME funds, Howard County is required to adopt affirmative procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners and potential tenants about fair housing laws and the County's policies
- A description of what the owners and/or sub-recipients will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the sub-recipients will do to inform persons of the new housing units who are not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The affirmative marketing policy for Howard County's HOME program requires that all owners submit a marketing plan to the County for the rental of Low-Moderate Income units. The County authorizes the right to require the owner to consult with County officials to revise the marketing plan to attract eligible residents consistent with the requirements of the loan and regulatory agreements. The owner must implement any plan or requirement that the County reasonably requires.

The owners must agree in their marketing of the project to:

- Display the fair housing logo poster in the rental office of the project in a conspicuous location.
- Ensure that any radio, television, newspaper advertisements, signs, pamphlets, or brochures used contain appropriate equal opportunity statements.
- Accept residents without geographic restrictions, except that preference may be given to applicants living or working in the area of the project.
- Forward copies of all written advertisements and transcripts or radio/television advertisements to the County during the initial lease-up.

The County's affirmative marketing policy with area Community Housing Development Organizations (CHDOs) requires the CHDO to adopt an affirmative marketing policy and procedure acceptable to the County to ensure that eligible persons, regardless of age, race, color,

national origin, sex, religion, and familial status, are adequately informed of the services they provide.

For all CDBG sub-recipient agreements, the sub-recipient must carry out its activities in compliance with all federal laws and regulations. The sub-recipient agrees to comply with the Howard County Human Rights Law, the Maryland Human Relations Law, Title VI of the Civil Rights Act of 1964, and the Americans with Disabilities Act, to name a few. Sub-recipients must also comply with the Fair Housing Act and Title VIII of the Civil Rights Act of 1968, including conducting activities in a manner to affirmatively further the policies of the Fair Housing Act.

Based on the review of the County's policy conducted for this analysis, the affirmative marketing policies for Howard County's HOME and CDBG programs do not address all of the HUD requirements. Items that need to be included are as follows:

- A more detailed description of what actions the owners/ grantees will take to affirmatively market housing assisted with CDBG or HOME funds.
- A description of what efforts the owners and/or grantees will take to inform persons not likely to apply for housing without special outreach.
- Information relative to the required maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units or ways to assess the effectiveness of such marketing practices.
- A description of how efforts will be assessed and what corrective measures will be taken when requirements of the affirmative marketing policies are not met.

d. Site and Neighborhood Standards Policy

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. These standards address the site location requirements for both rehabilitated and newly constructed rental units financed with HOME funds.

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.

Howard County should 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. Such a

policy will facilitate the County's goals toward affirmatively furthering fair housing.

ii. Appointed Citizen Boards and Commissions

A community's sensitivity to housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort. Public leadership and commitment is a prerequisite to strategic action.

Housing and housing-related issues in Howard County are addressed by a variety of appointed citizen volunteer boards, as described below.

a. Howard County Planning Board

The Planning Board is a five-member board of County residents, nominated by the County Executive and confirmed by the County Council, who serve five-year terms on a volunteer basis. The Planning Board makes recommendations to the Board of Appeals, Zoning Board, or County Council on matters related to planning and zoning, and renders a final decision on selected development proposals. Before making a recommendation or decision, the Planning Board holds a public meeting or public hearing that provides an opportunity for interested persons to provide comments or evidence.

The Zoning Regulations require approval by the Planning Board for certain development plans in districts that allow greater flexibility in site planning or that may have significant development impacts on existing neighborhoods, the environment, roads, and utilities. The Planning Board can approve or deny a proposed plan, or approve a plan subject to modifications.

Of the five members on the Planning Board, four are White and one is Black. Three of the members are males and two are females. None of the members have a disability and two represent households with children. Information on ethnicity of the members was not provided.

b. Howard County Human Rights Commission

The Howard County Human Rights Commission (HRC) was established in 1969. The duties and responsibilities of the HRC are prescribed by law, and include recommending a civil rights policy to the County Executive and the County Council; the authority to make surveys and studies concerning human rights, conditions and problems; and, the authority to file a complaint when there is reason to believe a pattern or practice of

discrimination exists. The HRC handles several categories of complaints, including housing, employment, law enforcement, public accommodations, and financing.

The HRC is composed of 11 members and a non-voting member, who is a student under 18 years of age. Of the 11 voting members, three are White and eight are minorities, including four Blacks, two Asians, one Hispanic, and one Iranian. There are eight males and three females on the HRC. None of the members indicated a disability and three members live in households with children.

c. Howard County Housing Commission
The Howard County Housing Commission (HCHC) is a separate legal entity which serves as the public housing authority for the purpose of developing and managing housing resources for low and moderate income residents of Howard County. The Commission also owns and manages residential property, maintains these properties, and develops affordable housing opportunities through partnerships with area developers and organizations. HCHC also operates the Section 8 Housing Choice Voucher program in the County.

HCHC has a five-member board. Of these five members, three are White and two are Black. Four members are male and one is female. No members of the HCHC indicated a disability and familial status and ethnicity were not provided for any of the five board members.

d. Howard County Housing and Community Development Board
The Housing and Community Development Board (HCDB) serves as an advisory board to the County Department of Housing and Community Development. The Board makes recommendations on funding for housing activities.

e. Howard County Board of Appeals
The Board of Appeals provides citizens with a final administrative review process for appeals relating to a various City determinations. The five-member Board had three White members and two Black members in 2011, all of whom were male.

f. Howard Commission on Disability Issues
The Commission on Disability Issues is a 15-member body appointed by the County Executive and confirmed by County Council to advise County government on the issues affecting disabled community members and matters related to compliance with the Americans with Disabilities Act. In 2011, the Commission had 13 members, seven of whom were female and six of whom were male. There were 10 White

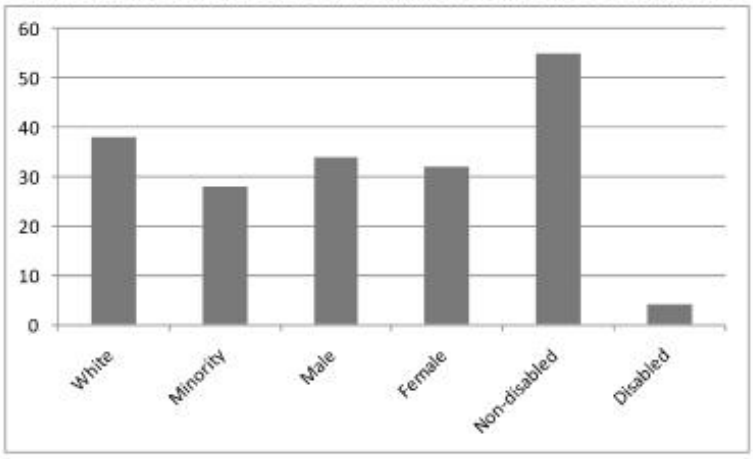
members, two Black members and one Asian member. The Commission included not only persons with disabilities, but also providers of related services, family members of disabled individuals and members of the general public.

g. Howard County Board to Promote Self-Sufficiency
This body was created in 2008 to act as the planning and coordinating mechanism for initiatives to promote the economic stability of individuals and families and reduce the incidence of poverty in the County. The Board had 16 members in 2011, 13 of whom were female. There were 11 White members, three Black members and two members reported as Other.

h. Howard County Commission on Aging
The Commission on Aging's mission is to promote successful aging for older adults in Howard County. As of 2011, this volunteer advisory board had six female members, five males and one member identifying as other-gender. The Commission included six White members, three Black members and three Asian members.

The following chart illustrates the lack of persons with disabilities and Hispanics on selected appointed boards and commissions in Howard County. The experiences and perspectives of members of the protected classes would enhance the decision-making processes in Howard County and offer the opportunity for advancing fair housing choice in all aspects of County government.

Figure 3-1
Composition of Citizen Boards and Commissions in Howard County, 2011



iii. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

a. Private Housing Stock

The Maryland Accessibility Code requires accessibility for persons with disabilities in certain new and rehabilitated residential and commercial property.[25] In 2004, the Department of Justice certified that Maryland's state code met or exceeded federal standards for accessible design. Howard County has adopted the state Accessibility Code as well as the 2009 International Building Code and the Maryland Building Rehabilitation Code. In its enforcement activity, the County's Department of Inspections, Licenses, and Permits (DILP) ensures that ADA requirements described on approved building plans are constructed properly.

For new HOME-assisted units, Howard County requires compliance with 24 CFR Part 8 which implements Section 504 of the Rehabilitation Act of 1973. Multi-family development must comply with 24 CFR 100.204, which implements the Fair Housing Act construction requirements. To address the needs of persons with mobility impairments, a minimum of 5% of all units (or at least one unit, whichever is greater) must comply with the Uniform Federal Accessibility Standards (UFAS) required under Section 504. An additional 2% of units (or at least one unit) are required to be accessible for individuals with hearing or vision impairments.

Howard County also enforces Universal Design requirements in age-restricted adult dwelling units. By requiring specific Universal Design features in this type of housing, the County has committed to creating new housing units for seniors with design elements intended to assist aging in-place. Some of the required features include no-step entrances, 36-inch wide front doors and hallways, and a master bedroom and bathroom on the first floor.

b. Public Housing Stock

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 also require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an authority's administrative offices, application offices, and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

[25] Department of Housing and Community Development: Building and Material Codes, Chapter 2. Article §2-111 and 3-103; Public Safety Article, §12-202; Annotated Code of Maryland

The Howard County Housing Commission owns and manages 24 units of public housing located in Colt's Crossing, a public housing community, and an additional 26 scattered-site units. Reasonable accommodations are made on a case-by-case basis. The Commission has not noted a need to conduct a Section 504 Needs Assessment of those properties. However, the Commission conducted a self-assessment in 1989 of its Section 8 Moderate Rehab Program. The process involved outreach to and involvement from interested persons in the community, including persons with disabilities and organizations representing them. A review of site accessibility and policies regarding persons with disabilities revealed no compliance issues.

iv. Language Access Plan for Persons with Limited English Proficiency

In order to accommodate persons with limited English proficiency (LEP) in the provision of information and services, Howard County advertises means of alternative access to documents, public hearings, and its website. The County formalizes and enhances the services offered to limited-English speakers in a language access plan. The Housing Commission, in particular, has a policy of striving to have bilingual staff or access to people who speak languages other than English to assist non-English-speaking families. To provide access to vital program documents, Howard County engages the services of Language Line, a premier translation service able to process documents in more than 170 languages. The Commission works with County offices to access translators and interpreters in many languages spoken locally. As stated previously, limited-English speakers of Spanish, Korean and Chinese constitute the language groups of greatest prevalence.

v. General Plan

Howard County has experienced significant growth from the Baltimore area as well as from the Washington DC area. In 1965, developer Jim Rouse founded Columbia as an urban area meant to absorb planned growth within the region. It was anticipated that growth in Columbia and the eastern portion of Howard County would insulate the "rural west" from development pressure. The County has undertaken consistent planning efforts since the 1960s to protect and preserve the rural character in the western area of the County by directing development to the eastern portion of the County.

In 1977, the County rezoned the rural west from one acre per dwelling unit to three acres per dwelling unit. The 1982 General Plan dramatically reduced the size of the 1971 planned water and sewer extension area in an attempt to further contain growth and maintain the rural landscape pattern. The 1982 General Plan also identified some areas north, south and east of Columbia for higher density housing and expanded employment corridors along I-95, US 1, US 29, and MD 100.

The 1990 General Plan responded to continued growth by recommending annual housing and employment growth targets, adequate public facilities legislation, a development monitoring system, and rural cluster and density exchange zoning in the rural west. The 1990 General Plan also recommended

the creation of several major mixed use centers in the eastern area of the County to absorb growth on the largest remaining parcels with access to highways.

Howard County's Adequate Public Facilities Act, adopted in 1992, established urban growth boundaries. The urban growth boundary was strengthened by Maryland's 1997 Smart Growth initiative under which most categories of State spending for infrastructure and services were required to be targeted to "Priority Funding Areas." Howard County's Priority Funding Area is the eastern 40% of the County that lies within the Planned Service Area for both public water and sewerage. In 1992, three-acre lot zoning in the rural west was replaced with cluster zoning, with an allowed density of one dwelling unit for 4.25 acres.

Howard County's 2000 General Plan encourages infill development, revitalization, and development of the areas zoned for mixed use development in the east, while protecting and supporting productive farmland and retaining the rural character of the west. The General Plan envisions the purchase of additional preservation easements in western Howard County. The 2000 General Plan establishes a cap of 250 new lots per year in the Rural West.

The present supply of land for housing, based on the latest 1993 Comprehensive Zoning, permits a total build-out of about 121,000 housing units. Of this total, 88,950 units are already built, leaving about 32,000 remaining to be built. In 2000, more than 40% of the remaining units were already committed to development, being either recorded, unbuilt lots, or units currently in the development review process. In 2000, it was estimated that 17,980 units remain to be built on uncommitted land. Of this total, some 5,320 units could be built in the rural west and another 12,660 units could be built in the East.

Of the uncommitted residential land, most of the land is in relatively small, scattered infill parcels within existing developed areas. Since neighbors are likely to resist significant changes to existing zoning, it is likely that most of the remaining residential land will be developed as currently zoned. The potential housing supply under current zoning is expected to be built-out in 2015.

Howard County's 2000 General Plan recognizes the need for additional affordable housing. This need is expressed primarily in terms of anticipated growth in employment and the related demand for low and moderate income workers. The Plan also recognizes the desirability of providing affordable housing for the children and parents of existing County residents, essential community workers (i.e., teachers, firemen and policemen), and affordable sales housing for existing renter households.

The Plan defines affordable housing as that which is affordable to low-income households (i.e., incomes at or below 50% of the median income) and to moderate income households (i.e., incomes up to 80% of the median

income). The Plan concludes that sales housing units in the $80,000 to $120,000 price range are affordable to moderate income households. The Plan concedes that housing priced below $80,000 would be affordable to low income families but is generally unavailable in the unsubsidized sales housing market. Current market data, for comparison, is included in the Cost of Housing section of the AI.

Due primarily to the nature of the local housing market, the County's General Plan does not envision the development of affordable housing to any significant level. High property values and the high proportion of recently-built homes in Howard County cause most market-rate housing to be priced out of reach of low or moderate income households. The supply of affordable housing will not be expanded significantly by new construction. As the supply of residential land diminishes, the price of land and housing is likely to increase. In zoning districts that permit a variety of unit types, builders will, in most instances, choose the most profitable type – higher priced, single-family detached units. There is little undeveloped land in the zoning districts that allow townhouses and apartments. Since much of the remaining land is relatively small infill parcels within single-family detached neighborhoods, rezoning for higher density is unlikely. Some affordable units will be created within the major Mixed Use Districts (MXD), which permit construction of townhouses and apartments, subject to certain limits.

The General Plan devotes discussion to the need for senior housing and housing for persons with disabilities.[26] This section of the Plan deals mainly with congregate and group housing options with supportive services, including acute care, congregate assisted living, group homes, congregate independent living, and retirement communities. The Plan states that the number of seniors in Howard County is expected to triple by 2020. However, the growing scarcity of residential land will make it increasingly difficult to find sites for new senior housing. Senior housing can conceivably be built within the County's office/employment districts (Planned Office Research and Planned Employment Center) that permit certain types of congregate and group housing in addition to employment uses. The Plan states that the need for senior housing should be balanced against the County's need to reserve its employment land for economic development.

County zoning regulations permit renovation of owner-occupied, single-family homes on lots of 12,000 square feet or larger to create accessory

[26] Since the release of the General Plan in 2000, there has been an expansion in the housing options available to seniors in Howard County, due in large part to policy initiatives that have advanced the development of age-restricted and moderate-income housing units (MIHU). The General Plan established an annual 250-unit allocation for age-restricted units in the eastern part of the County. A comprehensive rezoning in 2004 broadened the zoning districts in which MIHU could be built, and changes to the Adequate Public Facilities Ordinance (APFO) chart have allocated more MIHU development in recent years. New projects in higher-density and mixed-use zones as well as all age-restricted projects are required to build a certain percentage of affordable units, anywhere from 5% to 20%, depending on particular criteria.

apartments. Accessory apartments also may allow a senior to live independently in the home of an adult child.

The General Plan indicated that many active seniors desire to sell their large family home and yard to purchase a smaller, easier-to-maintain home with a first floor bedroom, though given current market conditions this may no longer be the case. This active senior market was the largest segment of the senior housing market, but the Plan determined that it was not well accommodated in Howard County. Many residents expressed concern about the need to move out of Howard County in order to secure this type of housing. The County anticipated that much of the demand for active senior housing would need to be accommodated through the renovation of existing homes.

In light of the anticipated increase in elderly population, the Plan recognizes the importance of constructing new dwellings using Universal Design standards. The Plan includes several action steps relative to Universal Design:

- Educate builders on the concepts of Universal Design, which incorporates design features that ease use by seniors and persons with disabilities
- Evaluate whether revisions to the Building Code are desirable
- Develop programs that encourage or require builders to use Universal Design concepts in new housing and in substantially renovated housing

Other housing-related policies and actions stated within the Plan include:

- Provide affordable housing for existing low and moderate income residents and for the diverse labor force needed for continuing economic growth. Reaffirm the County's long-standing policies of dispersing affordable housing units and providing housing for people of all income levels throughout the County.
- Develop an effective monitoring and intervention system for Federal and State assisted housing projects to ensure compliance with all requirements concerning conversion of such units to market rental rates.
- Seek funding sources that will enable the Office of Housing and Community Development to expand the supply of affordable housing to serve low or moderate income households, including seniors and persons with disabilities.
- Update the Consolidated Plan to specify the most effective means of using existing older homes as the principal means of addressing affordable housing needs. Increase funding for home ownership programs and provide incentives to convert homes from rental to ownership
- Maintain support for providers of emergency, crisis and transitional shelter and related services

- Ensure an adequate housing supply for the elderly, disabled, and special populations.
- Support expansion of affordable congregate housing arrangements throughout the County for the elderly, the disabled and special populations.
- Amend the Zoning Regulations to better distinguish and accommodate active senior, congregate independent and assisted living developments.
- In terms of senior housing in the rural west, review the elderly housing special exception to determine the most suitable criteria and requirements for this special exception use in the Rural Conservation and Rural Residential Districts and, if necessary, amend regulations as appropriate.
- Encourage the provision of transportation services to better link housing for seniors, the disabled and special populations to services and shopping. To adequately serve the County's senior population, the County Office on Aging maintains a wide variety of programs dedicated to various areas of need, and the Senior Housing Master Plan, released in 2004, outlines the housing and community needs that are anticipated as the County's elderly population grows during the next 25 years.
- Work with the nonprofit and for-profit sectors to assist seniors wishing to remain in their homes by developing programs to assist them with Universal Design renovations, creation of accessory apartments and needed home maintenance (for example, grants, tax credits and assistance with contracting). Nonprofit agencies noted to provide substantial assistance in rehabilitating or creating decent, affordable housing for lower-income families include Rebuilding Together Howard County and Habitat for Humanity.
- Revise the Consolidated Plan to include specific strategies for providing affordable housing by retaining existing assisted housing projects, using the existing housing stock to meet affordable housing needs by expanding programs to promote home ownership and including affordable housing in small mixed use centers.

Howard County's 2000 General Plan is exceptionally thorough in its treatment of residential land use and affordable housing issues. There are many policy statements within the Plan that address the housing needs of members of the protected classes and other lower income households within the context of Howard County's growth control environment. However, the Plan lacks an over-arching statement of policy that reflects the County's commitment to affirmatively further fair housing. In particular, the Plan is silent on the need to diffuse the concentration of lower income households and members of the protected classes in Columbia and its environs. In addition, 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, there is no specific strategy to address

the need for affordable rental housing for families currently living in or expected to reside in Howard County.

OBSERVATION: Howard County's General Plan addresses the County's affordable housing needs primarily through facilitating the expansion of age-restricted developments and moderately-priced housing units.

In Maryland, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits.

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments, accessory dwelling units and housing at various densities)
- The opportunity to develop alternative designs (cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons living together in dwelling units.

In addition, regulations governing the use of mobile homes were reviewed as this type of dwelling is an affordable housing option for many lower income households.

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The first Howard County Zoning Ordinance was adopted in 1948. The current Zoning Ordinance was adopted in 2007 with amendments through 2010.

b. Residential Zoning Districts & Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

There are a total of 18 base zoning districts in Howard County where residential uses are permitted by-right. There are an additional three overlay districts where residential uses are also permitted. Most of these zoning districts permit single family detached units and many permit single family attached units. Zero-lot line dwellings are permitted in the R-ED, R-12, R-SC and MXD districts.

Apartments, which are typically multi-family rental units, are permitted by-right in eight zoning districts. Notably, Housing Commission Housing Developments, a term unique to the Howard County Zoning Ordinance, are clearly distinguished from Apartments. Housing Commission Housing Developments are permitted by-right in only two zoning districts: the POR, Planned Office Research district and the PEC, Planned Employment Center district. In addition, this type of development is permitted in the I, Institutional overlay district. Neither the POR nor the PEC could be considered residential neighborhood districts. The primary purpose of the PEC district, as stated in the zoning ordinance, is to foster the development of attractive, large-scale employment centers.

The definition of Housing Commission Housing Development and the criteria to which such developments must comply were added to the County's zoning regulations in 2008. The purpose for the additions was to expand affordable housing options in certain commercial and industrial zoning districts for projects owned or managed by the Commission, and to ensure that such development is compatible with the surrounding neighborhoods. The objective was ostensibly to increase both housing and job opportunities for the population served by these communities.

Housing Commission Housing Developments are required to submit to a lengthy review and approval process, including a public hearing where the potential for public opposition to publicly financed affordable housing is very high. This, along with the fact that such developments are allowed by right in two districts, while other multi-family residences may locate by right in eight, would suggest that the definition has the effect of limiting opportunities for this type of residential development. However, in keeping with the General Plan's identification of need for affordable housing options, the County intends to use the definition as a way of carving out, or setting aside, areas that would be appropriate for Housing Commission Housing Developments. To the extent that this occurs in areas that are not concentrations of racial/ethnic minorities and low-income residents, thusly directing development can be applied as a means of expanding housing choice for members of the protected

classes, who are heavily represented among Housing Commission residents.

The County zoning ordinance was recently recognized in Zoning Practice, a monthly publication of the American Planning Association, for its Universal Design requirements in age-restricted adult dwelling units.[27] By requiring specific Universal Design features in this type of housing, Howard County has committed to creating new housing units for seniors with design elements intended to assist aging in-place. Some of the required features include no-step entrances, 36-inch wide front doors, 36-inch wide hallways, and a master bedroom and bathroom on the first floor.

[27] Jennifer S. Evans-Cowley, AICP. Zoning for Universal Design and Visitability, Zoning Practice, April 2006 (American Planning Association).

Figure 3-2
Zoning Ordinance Review of Howard County

Date of Ordinance	Original in 1948; revised Zoning Ordinance adopted in 2007	
Amended through	2010	Comments
Zoning districts & dwelling types where dwelling units are permitted by-right	**RC, Rural Conservation:** SFDU	There are 18 base zoning and three overlay zoning districts in which residential uses of some type are permitted by-right. Nearly all of these districts permit single family detached units (SFDU) and many permit single family attached dwelling units (SFADU). Zero-lot line dwelling units are permitted in R-ED, R-12, R-SC, and MXD districts. Apartments (i.e., multi-family rental units) are permitted by-right in eight districts (R-A-15, R-MH, R-VH, HO, HC, MXD, TOD and CAC). Housing Commission Housing Developments, which are clearly distinguished from Apartments as a different land use, are permitted in only two districts (POR and PEC), none of which are residential neighborhoods. Housing Commission Housing Developments are also permitted in the I, Institutional Overlay District.
	RR, Rural Residential: SFDU	
	R-ED, Residential: Environmental Development: SFDU, Zero-lot line DU	
	R-20, Residential: Single: SFDU	
	R-12, Residential: Single: SFDU, Zero-lot line DU, SFSDU	
	R-SC, Residential: Single Cluster: SFDU, Zero-lot line DU, SFADU	
	R-SA-8, Residential: Single Attached: SFDU, Zero-lot line DU, SFADU, Apartments	
	R-A-15, Residential: Apartments: SFDU, SFADU, Apartments	
	R-MH, Residential: Mobile Home: Mobile homes in Mobile Home Developments, SFDU, SFADU, Apartments	
	R-SI, Residential: Senior - Institutional: Age-restricted adult housing	
	I, Institutional Overlay: Housing Commission Housing Developments	
	R-VH, Residential:Village Housing: SFDU, SFADU, Apartments	
	HO, Historic: Office: SFDU, SFADU, Apartments in existing structures	
	HC, Historic: Commercial: SFADU, Apartments	
	POR, Planned Office Research: Housing Commission Housing Developments	
	PEC, Planned Employment Center: Housing Commission Housing Developments	
	MXD, Mixed Use: SFDU, Zero-lot line DU, SFADU, Apartments, Two-family dwellings	
	TOD, Transit Oriented Development: Apartments	
	CAC, Corridor Activity Center: Apartments, SFADU within Rt.1 Corridor Project	
Smallest permitted minimum residential lot size	**RC, Rural Conservation:** 33,000 sf w/ septic system in clustered subdivision	The entire western half of the County is zoned either RC or RR. As a result, with the exception of a B-2, General Business node at several locations throughout this rural part of the County, the remaining zoning districts are clustered in the eastern half of the County. Generally, the smallest minimum lot size requirement in most zoning districts is 6,000 square feet, equivalent to about 1/6 of an acre. Maximum units allowed per structure in multi-family developments ranges from 8-16. Maximum density permitted ranges from 8-25 dwellings per net/gross acre.
	RR, Rural Residential: 33,000 sf w/ septic system in clustered	
	R-ED, Residential: Environmental Development: SFDU 6,000 sf; Zero-lot line 4,000 sf	
	R-20, Residential: Single: SFDU 20,000 sf	
	R-12, Residential: Single: SFDU 12,000 sf	
	R-SC, Residential: Single Cluster: SFDU 6,000 sf; Maximum 8 du/structure; maximum density 4 du/net ac	
	R-SA-8, Residential: Single Attached: SFDU 6,000 sf; Maximum units per structure 8-16 du/net ac; Maximum density 8 du/net ac	
	R-A-15, Residential: Apartments: SFDU 6,000 sf; Maximum density 15 du/net ac; Maximum units per structure 8-16	
	R-MH, Residential:Mobile Home: Minimum district size 10 ac with minimum lot size of 2,000-4,000 sf; Maximum density 8 du/net ac	
	R-SI, Residential: Senior - Institutional: Maximum density 25 du/net ac	
	R-VH, Residential:Village Housing: SFDU 6,000 sf; Maximum density 8 du/net ac	
	HO, Historic: Office: SFDU 6,000 sf; Maximum density 15 du/net ac	
	HC, Historic: Commercial: FAR 3:1	
	POR, Planned Office Research: 2 ac	
	PEC, Planned Employment Center: 50 contiguous acres	
	MXD, Mixed Use: Maximum density 3-6 du/gross ac	
	CAC, Corridor Activity Center: 2 ac; Maximum density 15-25 du/net ac	
	TNC, Traditional Neighborhood Center (Overlay): 2 ac; Maximum density 8-20 du/net ac	

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Zoning Ordinance Review of Howard County (Continued)

Innovative Concepts	**RC, Rural Conservation:** Clustered subdivisions	Clustered subdivisions consist of clustered lots located in one area of a large parcel and a preserved area suitable for for agricultural use and/or protection of environmental/historic features. Moderate Income Housing Units required of 10% or 15% of units in R-A-15, R-SI, POR, MXD, TOD Universal design features required in Age-Restricted Housing developed in the R-SI, POR district. PSC overlay permits SFDU and MFDU in conjunction with assisted/nursing facilities. TOD permits Apartments within Rt. 1 Corridor Project with 3-acre minimum. TND permits Age-restricted housing. Apartments within Rt 40 Corridor Project.
	R-A-15, Residential: Apartments: Moderate Income Housing Units	
	R-SI, Residential: Senior - Institutional: Universal design features required	
	POR, Planned Office Research: Universal design features required	
	MXD, Mixed Use: Moderate Income Housing Units	
	PSC, Planned Senior Community (Overlay)	
	TOD, Transit Oriented Development: Apartments, Moderate Income Housing Units	
	TNC, Traditional Neighborhood Center (Overlay)	
Accessory Uses Permitted	**RC, Rural Conservation:** Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	RR, Rural Residential: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-ED, Residential: Environmental Development: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-20, Residential: Single: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-12, Residential: Single: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-SC, Residential: Single Cluster: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-SA-8, Residential: Single Attached: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-A-15, Residential: Apartments: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	
	R-MH, Residential:Mobile Home: Roomers/boarders, home care for persons with disabilities	
	R-VH, Residential:Village Housing: Roomers/boarders, home care for persons with disabilities	
	MXD, Mixed Use: Farm tenant houses, Accessory apartments, roomers/boarders, home care for persons with disabilities	

Source: Howard County Zoning Ordinance

c. Permitted Residential Lot Sizes

Generally, because members of the protected classes are often also in low income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

In Howard County, typical minimum lot size requirements range from 6,000 to 33,000 square feet per dwelling unit in a several single family zoning districts. Lots as small as 4,000 square feet are permitted for zero-lot line dwelling units. The maximum number of units per structure permitted ranges from 8-16. Maximum density permitted ranges from 8-25 dwellings per net/gross acre.

d. Innovative Concepts

Allowing innovative concepts or alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to innovative concepts and alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

Howard County incorporates several innovative designs in its zoning ordinance. In more than 5 zoning districts where residential uses are permitted by-right, there is a minimum requirement for Moderate Income Housing Units. The County's Moderate Income Housing Unit (MIHU) Program 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. MIHUs are sold or rented through the Howard County Department of Housing and Community Development (DHCD) at affordable prices and rents set by the Department. Any person or family can apply to buy or rent an MIHU, provided their household income does not exceed the maximum permitted income levels set forth by DHCD.

In townhouse zoning districts, 10% of the units in new developments must be made affordable to lower-income households. In the County's mixed-use zoning districts, 15% of the units in new developments must be made affordable to lower-income households. Most affordable housing development which occurs in Howard County is for households making between 50-80% of the median household income. Few developers are willing to target households making below 50%.

Sales prices for MIHUs range from about $168,000 for a condominium to about $230,000 for a single-family home. Prices vary based on the size and amenities of the home. For rental units, rents range from about $1,154 to $1,784, including utilities.

An individual wishing to purchase an MIHU in the County must fill out an application form during one of the four enrollment periods held throughout the year. The application requires information on income, assets, household size, and whether the applicant wishes to rent or purchase. Once an application is received and determined to be complete, the applicant's name is placed on a waiting list. As for-sale MIHUs become available, eligible applicants are notified and invited to attend a lottery drawing to select an eligible purchaser for each home. When rental MIHUs become available, eligible renters are chosen based on the date of application.

From May 2007 through December 2009, MIHU agreements were signed with developers for 233 for-sale units. Of those units, 77 new homes were awarded to MIHU applicants who became first-time homeowners in Howard County. In addition, there are currently 74 rental units occupied by MIHU tenants.

MIHU rental units recently completed in Howard County include Ashbury Courts in Laurel, Belmont Station in Elkridge, and Penniman Park in Elkridge. The MIHUs at Ashbury Courts include one- and two-bedroom units ranging from $983-$1,175 per month, without utilities. The apartments at Belmont Stations are a mix of one-, two-, and three-bedroom units ranging anywhere from $1,000 to $1,391 per month in rent, not including utilities. The apartment homes at Penniman Park are two-bedroom units renting for $1,175 without utilities.

Another innovative concept used in Howard County is zero-lot line development. Zero-lot line dwelling units are permitted by-right in several zoning districts. This type of housing is developed with one side of the unit sitting on the parcel line; the unit may or may not be attached to another dwelling unit. This type of lot design permits housing development on smaller lots. In Howard County, the minimum lot size for a dwelling unit in most single family zoning districts is 6,000 square feet; for zero-lot line units, where permitted, the minimum lot size is only 4,000 square feet.

Developing affordable housing in close proximity to public transit is one way to affirmatively further fair housing in outlying areas of a county. In Howard County, Apartments are a permitted use in the TOD, Transit Oriented Development districts. According to the zoning ordinance, Apartments are permitted within TOD developments of at least three acres and located within a Route 1 Corridor development project.

e. Definition of "Family"

Restrictive definitions of "family" may impede unrelated individuals from sharing a dwelling unit. The legislative history of the Fair Housing Act recognizes that local zoning ordinances may limit opportunities for persons with disabilities by restricting the number of unrelated persons

who can live together, thus constituting a family.[28] To comply with the Act, the definition of "family" should emphasize the functioning of the individuals as a cohesive household and the use of the dwelling unit being compatible with other single family dwellings in a residential zoning district.

In addition, the Fair Housing Act exempts from its coverage reasonable occupancy restrictions on the maximum number of occupants permitted to occupy a dwelling. Maximum occupancy restrictions are permitted if they apply to the occupants of all dwelling units, whether related or unrelated. Caution should be exercised when incorporating maximum occupancy standards so that family composition characteristics are not regulated. For example, a municipality may regulate the maximum number of occupants of a dwelling unit on the basis of available floor space or rooms, and serve to protect health and safety by preventing overcrowding. By comparison, a municipality should not impose occupancy standards based simply on the number of unrelated persons living together as this regulation would discriminate against persons with disabilities who are unrelated and living together in a group home.

The Howard County Zoning Ordinance defines "family" as "a. a single person occupying a dwelling unit and maintaining a household, or b. two or more persons related by blood, marriage or adoption, occupying a dwelling, living together, and maintaining a common household, or c. not more than eight unrelated individuals occupying a dwelling, living together, and maintaining a common household." The definition of family allows up to eight unrelated individuals to live together in a household as a "by right" use in all zoning districts. In all residential zoning districts, up to 16 unrelated individuals may live together in a residential care group home facility via approval of a "conditional use" (Sec 16.131.N.37). By definition, such facilities are to provide housing and supportive services to populations needing services due to age or emotional, mental, physical, familial or social conditions. These provisions are consistent with fair housing standards.

f. Regulation of Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve persons with disabilities. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses

[28] "Fair Housing Issues in Land Use and Zoning: Definitions of Family and Occupancy Standards," Mental Health Advocacy Services, Inc. (September 1998)

in the zoning district, are an impediment to the siting of group homes in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Towards this end, municipalities may not impose distancing requirements on group homes for persons with disabilities. Both HUD and the Department of Justice take the position that density restrictions are generally inconsistent with the Fair Housing Act. However, both federal agencies also believe that if a neighborhood came to be composed largely of group homes, that situation could adversely affect individuals with disabilities and would be inconsistent with the objective of integrating persons with disabilities into the community. In some cases, a consideration of over-concentration of group homes in an area could be considered in this context. This objective does not, however, justify requiring separations which have the effect of foreclosing group homes from locating in entire neighborhoods.

The Howard County Zoning Ordinance includes two terms that refer to group homes. As previously stated, the definition of "family" includes a provision for not more than eight unrelated persons occupying a dwelling and living together as a cohesive household. Also as previously described, this limit on the number of unrelated individuals living together discriminates against persons with disabilities because it restricts fair housing choice by capping the number of persons at eight.

The ordinance also includes the term "residential care facility" and defines it as "a residential facility that provides housing and supportive services to at least nine persons who are members of a population needing the services provided due to age, emotional, mental, physical, familial or social conditions. This term includes "assisted living facilities" as defined in these regulations. Residential care facilities provide group housing in which capacity is measured in terms of the number of beds, rather than individual dwelling units equipped with living, sleeping, and full kitchen facilities." This land use, as defined, classifies a "residential care facility" as similar to an assisted living facility and determines capacity by the number of beds, which is also comparable to assisted living facilities. As a result, the term "residential care facility" includes a type of residential land use that is more encompassing than a group home for persons with disabilities. Indeed, throughout the zoning ordinance, "residential care facility" is consistently cited in conjunction with "nursing home," both of which require conditional use permits.

g. Regulation of Mobile Homes

In many communities, mobile homes can offer an affordable housing option where the cost of land and residential construction is high. Zoning ordinances should permit mobile homes and modular homes on individual lots that meet the setback and lot size standards required of conventional site-built, single family detached homes. In addition, sufficient land should be zoned for mobile home parks at affordable densities of 4 to 8 dwelling units per acre.

The Howard County Zoning Ordinance defines "mobile home," in part, as "a dwelling unit that is fabricated in an off-site manufacturing facility for installation or assembly at the building site, which...was manufactured prior to the effective date of the National Manufactured Housing Construction and Safety Standards Act of 1974...and is designed to be used as a dwelling." The term "manufactured dwelling" is synonymous with "mobile home."

The ordinance also defines the term "modular dwelling" which is distinguished from "mobile home" as "a dwelling unit that has a minimum floor area of 900 square feet and a gabled roof...and bears the insignia certifying that it is built in compliance with the standards for industrialized buildings contained in the Industrialized Building and Mobile Homes Act of the Annotated Code of Maryland, Article 83B, Sections 6-201, et. seq."

Furthermore, the ordinance defines "single family detached dwelling" as "a building, including a modular dwelling, arranged or designed for use as a principal dwelling, and entirely separated from any other principal building by open area on all sides." As a result, in Howard County, modular dwelling units are permitted by-right wherever single family detached dwellings are permitted.

vii. Public Housing

The Howard County Housing Commission (HCHC) serves as the public housing agency for Howard County. The Commission owns and manages 24 units of public housing located in Colt's Crossing, a public housing community, and an additional 26 public housing units located at scattered sites throughout the County.

As of August 2010, there were 348 applicant households on the waiting list for a public housing unit. Of these, families with children account for 70.1% and households with a disabled member represent 23.6%. Non-White households represent 87.4% of all waiting list applicants.

Figure 3-3
Characteristics of Public Housing Households and Waiting List Applicants

	Current Tenants		Waiting List	
	#	%	#	%
Total Households	**48**	**100.0%**	**348**	**100.0%**
Income				
Extremely low (<30% MFI)	24	50.0%	284	81.6%
Very low (>30% but <50% MFI)	11	22.9%	53	15.2%
Low (>50% but <80% MFI)	13	27.1%	11	3.2%
Type				
Families with children	33	68.8%	244	70.1%
Individuals/families with disabilities	8	16.7%	82	23.6%
Elderly (one or two persons)	7	14.6%	22	6.3%
Race				
White	6	12.5%	44	12.6%
Black	41	85.4%	216	62.1%
Other	1	2.1%	88	25.3%
In HCHC's jurisdiction			147	42.2%
Charactertistics by Bedroom Size				
0 bedroom	0	0.0%	0	0.0%
1 bedroom	0	0.0%	1	0.3%
2 bedrooms	0	0.0%	9	2.6%
3 bedrooms	46	95.8%	272	78.2%
4 bedrooms	2	4.2%	64	18.4%
5+ bedrooms	0	0.0%	0	0.0%

Source: Howard County Housing Commission, August 2010

OBSERVATION: As of August 2010, there were 348 households on the waiting list for public housing in Howard County, of which families with children constituted 70.1%.

Map 9 shows the location of public housing units in Howard County. Colt's Crossing is located in Ellicott City, which is not an area of racial, ethnic, or LMI concentration.

HUD's Picture of Subsidized Households dataset contains records on the number of subsidized units by type for 2000 and 2008. Comparisons between the two years are based on an assumption of consistent data collection and reporting methods. HUD's records show an overall 6.4% increase in subsidized rental units across Howard County. Compared to 2000, 25.8% more Low-Income Housing Tax Credit (LIHTC) projects were on record in 2008. The number of project-based Section 8 vouchers also increased during this period. At the same time, other types of units were lost from the inventory due to the expiration of program provisions, consolidation, or other causes.

Figure 3-4
Subsidized Units by Type, 2000 and 2008

	2000	2008	% Change
Public Housing*			
Total project sites	Scattered	Scattered	0.0%
Total units	50	50	
Assisted Housing			
LIHTC			
Project Sites	7	9	25.8%
Units	782	984	
Section 236			
Project Sites	4	2	-56.5%
Units	598	260	
Project-Based Section 8			
Project Sites	11	10	75.6%
Units	717	1,259	
Other Assisted Multifamily			
Project Sites	3	8	-71.8%
Units	344	97	
Total Subsidized Units	**2,491**	**2,650**	**6.4%**

* HUD records classify properties differently than the local Housing Authority, resulting in figures that differ here from the public housing inventory described later in the AI.

Source: HUD Picture of Subsidized Households, 2000 and 2008

Map 10 on the following page illustrates the geographic location of other assisted housing units in Howard County. The majority of assisted housing units are located in impacted areas. Specifically, most of these units are located in areas of Black concentration, areas of Hispanic concentration, and LMI areas.

OBSERVATION: The majority of assisted housing units in Howard County are located in areas of Black concentration, areas of Hispanic concentration, and/or LMI areas.

In addition to public housing, HCHC administers the Housing Choice Voucher Program. Families with children account for 56.7% of all households, while households with a disabled member represent 23% of all voucher holders. Non-White households represent 76% of all voucher holders.

The waiting list for vouchers included 3,190 households as of August 2010. Of those households with applications pending, families with children represent 59%, and households with a disabled member account for 23.4% of all applicants. In addition, elderly households represent 17.6% while non-White household applicants account for 62.8% of the waiting list.

Figure 3-5
Characteristics of Section 8 Households and Waiting List Applicants

	Current Tenants		Waiting List	
	#	%	#	%
Total Households	**1,073**	**100.0%**	**3,190**	**100.0%**
Income				
Extremely low (<30% MFI)	848	79.0%	2,410	75.5%
Very low (>30% but <50% MFI)	167	15.6%	718	22.5%
Low (>50% but <80% MFI)	58	5.4%	28	0.9%
Type				
Families with children	608	56.7%	1,881	59.0%
Individuals/families with disabilities	247	23.0%	747	23.4%
Elderly (one or two persons)	218	20.3%	562	17.6%
Race				
White	258	24.0%	531	16.6%
Black	783	73.0%	1,591	49.9%
Other	32	3.0%	411	12.9%
In HCHC's jurisdiction			2,082	65.3%
Charactertistics by Bedroom Size				
0 bedroom	8	0.7%	3	0.1%
1 bedroom	336	31.3%	1,177	36.9%
2 bedrooms	330	30.8%	1,220	38.2%
3 bedrooms	324	30.2%	644	20.2%
4 bedrooms	67	6.2%	125	3.9%
5+ bedrooms	8	0.7%	10	0.3%

Source: Howard County Housing Commission, August 2010

OBSERVATION: Black households represent 85.4% of public housing residents, 73% of voucher holders, and 62.1% and 49.9%, respectively, of applicant households on the waiting lists for the public housing and voucher programs.

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Map 11 illustrates the geographic distribution of HCV holders in Howard County. Areas with high numbers of voucher holders also tend to be areas of Black concentration, Hispanic concentration, and/or LMI areas.

During the course of stakeholder interviews held throughout the preparation of this analysis, it was stated that 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.

In another interview, concerns about the County's HCV payment standards were discussed. Howard County's HCV program utilizes a fixed payment standard that some advocates argued 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.

Comments were also made on existing confusion among landlords and property managers 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.

The Housing Commission operates a HCVP Homeownership Program through which it provides a purchase subsidy to eligible homebuyers. Thus far, there have been two closings through the program, both by minority households.

HCHC is currently developing mixed-income housing. Typically, these developments consist of 60% market-rate units and 40% tax credit units. In the last three years, the Commission has acquired 360 units. By itself and also in partnership with other organizations, HCHC has developed 266 housing units, and an additional 200 units will be coming online over the next five years. More than 20% of the units developed by the Housing Commission are affordable to lower-income households, as defined by the Commission.

Two policy documents utilized by HCHC were reviewed for this analysis. A summary of the reviews of the administrative plans for both public housing and the Section 8 Housing Choice Voucher Program are included below.

a. Section 8 Housing Choice Voucher Administrative Plan

The Housing Commission's HCVP Administrative Plan, most recently updated in September 2011, contains a detailed Fair Housing Policy to state its intention to comply fully with all federal, state and local non-discrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment. The policy prohibits the Commission from denying any family or individual the equal opportunity to apply for or receive assistance under the voucher program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, source of income, familial or marital status, handicap or disability or sexual orientation. The policy additionally includes statements on education and outreach, training and recourse for persons who believe they have experienced discriminatory acts.

The fair housing policy is followed by the Commission's policy on reasonable accommodations. The Commission's requirements for demonstrating justification for a reasonable accommodation are different from those used by HUD. To be eligible to request a reasonable accommodation from the Commission, the requester must certify that they are a person with a disability under the ADA definition by demonstrating:

- A physical or mental impairment that substantially limits one or more of the major life activities of an individual
- A record of such impairment, or
- Being regarded as having such impairment.

In order to be eligible to receive a Housing Choice Voucher, the applicant must qualify as a "family." In Section 4-F of the Admin Plan, HCHC defines a "family" as at least one adult with a child or dependent, a group consisting of two or more elderly or disabled persons living together, or one or more elderly or disabled persons living with live-in aides. Additionally, a "family" can include two or more persons sharing residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence of a stable family relationship. Further, a family must meet at least one of the following criteria:

- Related by blood, marriage, or adoption
- Have demonstrated a stable family relationship over a 12 month period
- With dependent child under the age of 18
- With child who is currently receiving disability benefits
- With child below age 21 who is a full-time student

HCHC policy also states that single persons may qualify as a family with the same status as a family with two or more persons under the following circumstances: a single and pregnant female with no other children or a single person who is in the process of obtaining legal custody. In addition, eligible single persons also include elderly individuals (age 62 or older) and a disabled person, regardless of their age.

Chapter 6 of the Admin Plan discusses the local waiting list preferences utilized by the Housing Commission to determine the priority for assistance to households listed on the Section 8 waiting list. Currently, assistance is issued based only on the emergency preference, contingent on the availability of funding. Particularly, the preference applies to households that have been involuntarily displaced and those residing in substandard housing.

HCHC's policy allows a HCV participant to be assigned a larger unit than permitted, if the household provides appropriate documentation that a larger unit is required due to medical or health reasons. An exception to the subsidy standards may also be approved when it causes an undue hardship on an over-housed elderly or disabled family to relocate to a smaller sized unit. This exception is granted solely at the discretion of the Commission.

The Commission will honor requests for extensions past the initial 120-day period for finding a suitable housing unit, as a reasonable accommodation for persons with disabilities. However, the Commission may request documentation of the voucher holder's efforts to locate housing as a condition of any extensions past 150 days.

Chapter 15 of the Admin Plan discusses portability options. It is the policy of the Commission to require non-resident applicants to reside in Howard County for a period of at least one year before exercising the provisions of portability.

The Commission provides program participants with prompt written notice of decisions related to change of status. When a decision is made that may have an adverse affect on a program participant, which the Commission deems is subject to appeal, a notice of appeal rights is included in the written transmission of the decision. In addition, HCHC policy states that when a program participant receives a written notice of a change of status decision which indicates that an appeal is allowable, they may request an informal hearing/review within the time period allowed in the notice. The length of the appeal period shall be at least 10 calendar days from receipt of notice. A program participant may request a hearing/review on any other written notice of a PHA decision within 10 days of receipt of the notice.

The Commission conducts an annual rental survey which identifies accessible units in multi-family dwellings throughout the County. This list of accessible units should be shared with area service providers. In addition, HCHC actively partners with various agencies in the County to

assist persons with disabilities. For example, the Commission refers issues dealing with reasonable accommodations to the Howard County Office of Human Rights.

b. Public Housing Admission and Continued Occupancy Plan (ACOP)
The Commission's Admissions and Continued Occupancy Plan (ACOP) was substantially revised in May 2011. At that time, the Commission added detailed statements on fair housing and reasonable accommodation to the beginning of the document, clarifying how the Commission will achieve compliance with all federal, state and local non-discrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment. The ACOP policy prohibits the Commission from excluding anyone from participation in HCHC programs on the basis of race, creed, religion, disability, color, sex, national origin, age, occupation, marital status, political opinion, sexual orientation, personal appearance, familial status or source of income. This collection of protected classes is broader than that in the Admin Plan, which does not explicitly extend to the bases of political opinion, occupation or personal appearance. The policy additionally includes statements on recourse for persons who believe they have experienced discriminatory acts.

The policies of reasonable accommodation included in the ACOP mirror those in the HCVP Admin Plan, requiring a person requesting a reasonable accommodation to meet the ADA definition of a person with a disability. With regard to persons with limited English proficiency, HCHC states an intention to provide access to translators and interpreters as needed.

Sections 6 and 7 define the Commission's admission procedures. All applicants must qualify as a family. The term "family" is defined as an elderly person, two or more elderly persons who will live together as a unit, or two or more persons who are either related by blood, marriage, or adoption. The term "family" also includes a group of persons who are not so related but have demonstrated a stable family relationship over a period of at least 12 months.

Section 8 establishes admissions preferences. HCHC has several local preferences. First preference is given to applicants who live in Howard County. A second preference is given to households with a head, spouse or sole member who works at least 20 hours per week in Howard County. A third preference is afforded to households with a head, spouse or sole member who has a current offer of employment in Howard County. Other preferences include having income which falls within the category required to maintain a broad range of income, being a family with a disabled member when the housing unit available has characteristics that address the needs of the disabled person, and by earliest date of application.

The ACOP states that unless applicants can show that acceptance of a unit offer will result in undue hardship or burden, refusal to accept a unit assignment within fifteen days will cause their name to be placed at the bottom of the list. The hardship or burden must clearly be related to the consequences of accepting the unit offered.

Section 16 outlines the HCHC's extensive pet policy. Pets must be registered with HCHC. Residents must pay a non-refundable "unit depreciation fee" for their pet. This fee is $300 for dogs and $150 for cats. Only one pet per unit is allowed which must not exceed more than 20 pounds in weight and 18 inches in height. However, no part of the pet policy applies to animals that are used to assist persons with disabilities. Assistive animals are allowed in all public housing facilities with no restrictions other than those imposed on all tenants to maintain their units and associated facilities in a decent, safe and sanitary manner and to refrain from disturbing their neighbors.

HCHC's grievance policy is outlined in Appendix C. This section establishes a procedure for residents to present complaints and grievances. Applicants who feel they have been unduly denied admission may request an informal hearing. Residents may file a grievance when they feel that an HCHC action or inaction has adversely affected their rights, duties, welfare, or status.

B. Private Sector

i. Real Estate Practices

Howard County is served by the Howard County Association of Realtors. New members receive instruction in fair housing as part of the licensing requirements of the Maryland Division of Occupational and Professional Licensing. Prior to taking the real estate exam, each applicant is required to accumulate 60 hours of classroom instruction. Additionally, each agent must renew his or her license every two years. Between six and 15 hours of specified continuing education courses are a requirement for license renewal. Fair housing training is required as part of the continuing education coursework. Fair housing classes are taught by education providers licensed through the Maryland Real Estate Commission. There are six such providers in Howard County, including three in Columbia, two in Ellicott City, and one in Marriottsville.

The Association provides fair housing information through monthly newsletters and a regularly updated website. Members of the Association are referred to the Maryland Association of Realtors website and the National Association of Realtors website for additional information related to fair housing.

The Association posts a diversity statement on its website. The diversity statement affirms that the Howard County Association of Realtors values and

seeks diverse and inclusive participation in its real estate practices. In addition, the Association will promote involvement and expand access to leadership opportunity within the Association, regardless of race, ethnicity, gender, religion, age, sexual orientation, nationality, disability, appearance, geographic location, or professional level. The Association is committed to providing leadership, time, and resources to accomplish this objective while serving as a model to other associations engaged in similar endeavors.

The Association offers several education classes for its members on topics such as mortgage financing, renovation financing, reverse mortgages, legislative updates, real estate ethics, legal issues, and fair housing issues. Moreover, the Association has been actively involved in fair housing initiatives throughout Howard County. The Association participates annually in Fair Housing Month (April) through the "Come Home to Howard County" Housing Fair. The Association also has a page on its website devoted to fair housing definitions, including definitions of the various protected classes. Last April, in conjunction with Fair Housing Month, the Association held a fair housing course for continuing education credit for its members.

ii. Home Mortgage Financing

a. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Howard County is from 2008. Reviewing this data, along with 2007 and 2006 records, helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchase. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the County. The information provided by race and sex is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to the lack of information. The following table summarizes three years of HMDA data by race, ethnicity, and action taken on the application, with detailed information to follow.

Figure 3-6
Summary of Mortgage Loan Activity in Howard County, 2006-2008

	2006		2007		2008	
	#	%	#	%	#	%
Total Loans						
Applied for	**9,590**	**100.0%**	**7,148**	**100.0%**	**4,835**	**100.0%**
Black	2,164	22.6%	1,286	18.0%	603	12.5%
White	4,980	51.9%	3,817	53.4%	2,735	56.6%
Asian	1,154	12.0%	1,028	14.4%	726	15.0%
Hispanic*	918	9.6%	359	5.0%	157	3.2%
Other race	100	1.0%	75	1.0%	43	0.9%
No information/NA	1,192	12.4%	942	13.2%	728	15.1%
Originated	**7,013**	**73.1%**	**5,115**	**71.6%**	**3,406**	**70.4%**
Black	1,400	64.7%	770	59.9%	401	66.5%
White	3,947	79.3%	2,943	77.1%	2,022	73.9%
Asian	833	72.2%	728	70.8%	480	66.1%
Hispanic*	668	72.8%	232	64.6%	100	63.7%
Other race	61	61.0%	52	69.3%	25	58.1%
No information/NA	772	64.8%	622	66.0%	478	65.7%
Denied	**987**	**10.3%**	**807**	**11.3%**	**509**	**10.5%**
Black	366	16.9%	250	19.4%	96	15.9%
White	353	7.1%	314	8.2%	230	8.4%
Asian	119	10.3%	111	10.8%	100	13.8%
Hispanic*	123	13.4%	82	22.8%	27	17.2%
Other race	11	11.0%	12	16.0%	10	23.3%
No information/NA	138	11.6%	120	12.7%	73	10.0%

Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications do not include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2006-08

The most obvious trend in 2006-2008 HMDA data for Howard County is the steep drop in the number of loan applications. This can be attributed primarily to stagnating home sales rates in the County that coincided with the national housing market crisis. The number of loan applications dropped by 2,442 (25.5%) from 2006 to 2007, then fell by an additional 2,313 (32.4%) in 2008. At the same time, the share of Black applicants fell even more precipitously, 72.1% overall, suggesting that this protected class became disproportionately less able to afford home ownership.

Over the course of the three years, the overall percentage of applications that resulted in loan originations decreased slightly, although Black households experienced an increase of 1.8 percentage points in the origination rate. Overall, fewer Black households applied, but those that did experienced greater success.

The percentage of applications that were successful decreased for all other racial and ethnic groups: 5.4 percentage points for White applicants, 6.1 points for Asian applicants, 9.1 points for Hispanics

applicants, and 2.9 points for those of Other Races (American Indian/Alaska Native and Hawaiian applicants). The number of overall application denials increased between 2006 and 2008, although Black households experienced a decline of 1.0 percentage point in the denial rate. While Black households were denied less often, the denial rate increased for all other racial and ethnic groups: 1.3 percentage points for White applicants, 3.5 points for Asian applicants, 3.8 points for Hispanic households, and 12.3 points for households of Other Race.

The following sections contain detailed analysis for applications filed in 2008, the latest year for which information is available. Figure 3-7 contains 2008 summary data.

Figure 3-7
2008 Summary Report Based on Action Taken Mortgage Data, 2008

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	3,792	78.4%	2,600	52.9%	286	5.8%	421	8.6%	485	12.8%
FHA	819	16.9%	628	49.0%	31	2.4%	75	5.9%	85	10.4%
VA	223	4.6%	177	51.3%	10	2.9%	13	3.8%	23	10.3%
FSA/RHS	1	0.0%	1	50.0%	-	0.0%	-	0.0%	-	0.0%
Loan Purpose: Home Purchase										
One to four-family unit	4,716	97.5%	3,374	52.6%	304	4.7%	447	7.0%	591	12.5%
Manufactured housing unit	119	2.5%	32	25.2%	23	18.1%	62	48.8%	2	1.7%
Applicant Race										
American Indian/Alaska Native	29	0.6%	18	51.4%	1	2.9%	7	20.0%	3	10.3%
Asian/Pacific Islander	726	15.0%	480	53.6%	46	5.1%	100	11.2%	100	13.8%
Hawaiian	14	0.3%	7	46.7%	2	13.3%	3	20.0%	2	14.3%
Black	603	12.5%	401	50.6%	29	3.7%	96	12.1%	77	12.8%
Hispanic**	157	3.2%	100	51.8%	17	8.8%	27	14.0%	13	8.3%
White	2,735	56.6%	2,022	60.8%	192	5.8%	230	6.9%	291	10.6%
No information	727	15.0%	478	58.5%	57	7.0%	72	8.8%	120	16.5%
Not applicable	1	0.0%	-	0.0%	-	0.0%	1	0.2%	-	0.0%
Applicant Sex										
Male	3,056	63.2%	2,183	58.8%	212	5.7%	306	8.2%	355	11.6%
Female	1,386	28.7%	967	55.5%	87	5.0%	161	9.2%	171	12.3%
No information	391	8.1%	255	59.9%	28	6.6%	41	9.6%	67	17.1%
Not applicable	2	0.0%	1	0.2%	-	0.0%	1	0.2%	-	0.0%
Total	4,835	100.0%	3,406	67.0%	327	6.4%	509	10.0%	2,235	46.2%

Source: Federal Financial Institutions Examination Council, 2008

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

* Total applications do not include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

1) Households by Race

In 2008, 4,835 mortgage applications were made for the purchase of either a one- to four-family owner-occupied unit or a manufactured housing unit in Howard County. Of these applications:

- 56.6% (2,735) of the applications were submitted by White households.

- 12.5% (603) were submitted by Black households.
- 3.2% (157) were submitted by Hispanic households. HMDA data classifies Hispanics as an ethnic group and not a race. Therefore, this data overlaps with persons classified under a specified race.
- 15.0% (726) were submitted by Asian/Pacific Islander households.
- 0.9% (43) were submitted by households of other races.

Race/ethnicity data were not included for 728 applications (15.0%).

2) Conventional Loans versus Government Backed Loans

Loan types in 2008 included conventional mortgage loans and a variety of government-backed loans, including FHA, VA, and FSA/RHS. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In Howard County:

- 21.5% (1,043) of the households that applied for a mortgage loan applied for a government-backed loan. This is a large increase from 1.8% in 2006. Of those, the majority (78.6%) applied for FHA loans.
- The denial rate for FHA loans was lower than that of conventional loans.
    - The denial rate for FHA loans was 5.9% (75 of 819), while the denial rate for VA-guaranteed loans was 3.8% (13 of 223).
    - The denial rate for conventional loans was 8.6%.
    - One application was submitted for an FSA/RHS loan. The loan was originated.

3) Denial of Applications

In 2008, the mortgage applications of 509 households in Howard County were denied (10.0%).

Reasons for Loan Denial

Denial reasons were given for 431 of the mortgage applications in 2008. Reasons for denial are included the following chart:

Figure 3-8
Reasons for Denial, 2008

Primary Reason for Denial	#	%
Ratio of debt to income	122	28.3%
Collateral	62	14.4%
Other	62	14.4%
Credit application incomplete	57	13.2%
Credit history	50	11.6%
Insufficient cash	34	7.9%
Unverifiable information	28	6.5%
Employment history	12	2.8%
Mortgage insurance denied	4	0.9%
Total	**431**	**100.0%**

Unsatisfactory debt-to-income ratios, insufficient collateral, and poor credit history are some of the major reasons for denial of home mortgage applications. Therefore, there may be opportunities for lenders to focus on these problems and work with applicants to address these concerns.

Applications Denied by Race and Ethnicity

Among minority groups with more than 100 total applications, Hispanic households had the highest mortgage denial rate at 17.2%, or 27 of 157 applications submitted. White households were far more likely to receive loans than non-White households, as only 8.4% of applications were denied. Details for 2008 appear in the following table.

Figure 3-9
Denials by Race/Ethnicity, 2008

Race/Ethnicity	Total Applications	Number of Denials	Denial Rate
Black	603	96	15.9%
Asian	726	100	13.8%
Not Provided	728	73	10.0%
Am. Indian/Alaska Native	29	7	24.1%
Hispanic*	157	27	17.2%
White	2,735	230	8.4%
Hawaiian	14	3	21.4%

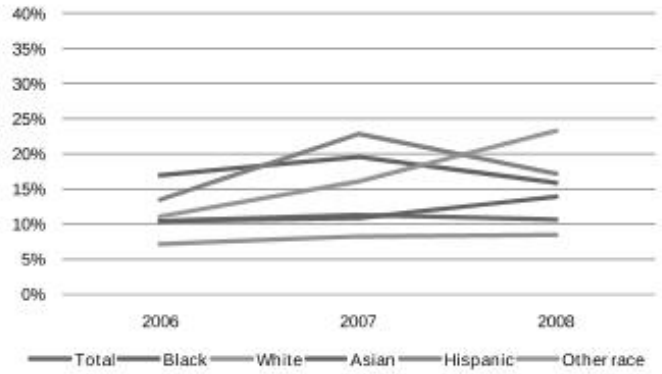
* Hispanic ethnicity is counted independently of race.

Between 2006 and 2008, the distribution of denials by race and ethnicity displayed a number of different patterns, as shown in the following chart. White households consistently had a lower denial rate than all other households.

Figure 3-10
Denial Rates by Race/Ethnicity, 2006-2008

	2006	2007	2008
Total	10%	11%	11%
Black	17%	19%	16%
White	7%	8%	8%
Asian	10%	11%	14%
Hispanic	13%	23%	17%
Other race	11%	16%	23%

Figure 3-11
Denial Rate Trends by Race/Ethnicity, 2006-2008



Applications Denied by Income

In 2008, the HUD median family income (MFI) in Howard County was $78,200. For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI.

Applications made by lower-income households accounted for 25.1% of all denials in 2008, though they accounted for only 14.6% of total applications.

Figure 3-12
Denials by Income, 2008

Income Level	Total Applications	Denials	Denial Rate
Below 80% MFI	704	128	18.2%
At least 80% MFI	4,095	375	9.2%
No information	36	6	16.7%
Total	4,835	509	10.5%

Denial Data by Income Level and Race

Of the 509 applications that were denied by area lending institutions, 503 reported household income. Among all lower-income households, the denial rate was highest for American Indian/Alaska Native households

(33.3%) and Hawaiian households (33.3%), although it should be noted that their number of total applications was extremely small. White households had by far the lowest denial rate at 14.2%.

Figure 3-13
Denials for Lower-Income Applicants, 2008

Race/Ethnicity	Total Applications	Denials	Denial Rate
Black	104	26	25.0%
Asian	92	21	22.8%
Am. Indian/Alaska Native	6	2	33.3%
Hispanic*	48	15	31.3%
White	408	58	14.2%
Hawaiian	3	1	33.3%
Not Provided/NA	91	20	22.0%
Total	704	128	18.2%

* Hispanic ethnicity is counted independently of race.

A similar pattern can be found among applications submitted by upper-income households. Denial rates were highest for American Indian/Alaska Native households (21.7%) and Hawaiian households (18.2%), although once again it should be noted that their number of total applications was small. White households had the lowest denial rate at 7.3%. Notably, upper-income Black households had the same denial rate of about 14% as lower-income White households.

Figure 3-14
Denials for Upper-Income Applicants, 2008

Race/Ethnicity	Total Applications	Denials	Denial Rate
Black	498	70	14.1%
Asian	633	79	12.5%
Not Provided/NA	629	52	8.3%
White	2,301	167	7.3%
Hispanic*	108	12	11.1%
Am. Indian/Alaska Native	23	5	21.7%
Hawaiian	11	2	18.2%
Total	4,095	375	9.2%

* Hispanic ethnicity is counted independently of race.

Denial Data by Census Tract

The HMDA data for Howard County was analyzed to determine if a pattern of loan denials exists by census tract. Map 12 provides an overview of the geographic distribution of denial rates. Of all tracts with at least 10 applications in 2008, denial rates exceed 15% in three. Tract 6069.01, which is 37.8% Black, had 28 denials among 114 applications (24.6%); and tract 6069.03, which is 33.1% Black, had 29 denials among 156 applications (18.6%). In addition, tract 6055.03, which is 36.2% Black, had 7 denials in 45 applications (15.6%).

Overall, higher rates of denials were noted in both impacted and non-impacted areas.

iii. High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers.[29] The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

[29] HMDA analyses in metropolitan areas across the United States have provided conclusive evidence that minority groups pay more for their mortgages. For example, a 2007 analysis by New York University's Furman Center for Real Estate and Urban Policy found that Black- and Hispanic-majority neighborhoods were more likely to borrow from a subprime lender than White-majority neighborhoods with similar income levels. Also in 2007, the NAACP sued two of the nation's largest mortgage lenders, HBC and Wells Fargo, for "systematic, institutionalized racism" in lending, including giving subprime rates to Black customers who qualified for better rates while giving better rates to White customers. This type of mortgage discrimination has been alleged in a growing number of cities.

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

In 2008, 4.2% (143) of the 3,406 home purchase loans that were originated in Howard County, and for which income information was provided, were high-cost. The following chart shows the distribution of high cost loan originations by race and by income for three years.

Figure 3-15
Distribution of High-Cost Mortgage Loans by Race/Ethnicity and Income, 2006-08

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2006	Am. Indian/Alaska Native	0	N/A	N/A	19	5	26.3%
	Asian	37	1	2.7%	730	82	11.2%
	Black	131	35	26.7%	1,175	554	47.1%
	Hawaiian	1	0	0.0%	34	10	29.4%
	White	345	26	7.5%	3,357	473	14.1%
	No information/NA	59	11	18.6%	670	134	20.0%
	Hispanic*	45	10	22.2%	538	251	46.7%
	Total	**573**	**73**	**12.7%**	**5,985**	**1,258**	**21.0%**
2007	Am. Indian/Alaska Native	5	1	20.0%	19	4	21.1%
	Asian	62	4	6.5%	647	35	5.4%
	Black	136	15	11.0%	600	115	19.2%
	Hawaiian	6	2	33.3%	22	2	9.1%
	White	306	34	11.1%	2,568	151	5.9%
	No information/NA	60	3	5.0%	547	33	6.0%
	Hispanic*	35	6	17.1%	188	43	22.9%
	Total	**575**	**59**	**10.3%**	**4,403**	**340**	**7.7%**
2008	Am. Indian/Alaska Native	3	0	0.0%	15	2	13.3%
	Asian	53	2	3.8%	426	13	3.1%
	Black	56	2	3.6%	345	34	9.9%
	Hawaiian	1	0	0.0%	6	0	0.0%
	White	278	19	6.8%	1,726	50	2.9%
	No information/NA	49	2	4.1%	428	19	4.4%
	Hispanic*	24	5	20.8%	75	4	5.3%
	Total	**440**	**25**	**5.7%**	**2,946**	**118**	**4.0%**
Three-Year Totals		**1,588**	**157**	**9.9%**	**13,334**	**1,716**	**12.9%**

Note: Does not include loans for which no income data was reported: 455 in 2006, 137 in 2007, and 20 in 2008
*Hispanic ethnicity is counted independently of race.

Of the 15,534 applications for which loans were originated between 2006 and 2008, 14,922 included data on household income. Of this total, 1,588 reported household incomes at or below 80% of the median family income,

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and 157 of these lower-income households, 9.9%, had high-cost loans. The rate of high-cost loans for higher-income households is higher, at 12.9%, including 1,716 of 12,334 higher-income households. However, looking at the information for each year reveals a different pattern. In 2006, higher-income households had a higher rate of high cost loans: 21.0% versus 12.7% for lower-income households. In 2007, this trend was reversed, with lower-income households having a higher rate of high-cost loans: 10.3% versus 7.7% for upper-income households. This was true again in 2008, with 5.7% of originations for lower-income households being high-cost versus 4.0% for upper-income households.

Notably, the percentage of high-cost originations declined each year, along with the total number of originations and applications. This could be due to policy changes that have limited subprime lending and/or the necessity for lenders to make rates more competitive as the total number of applications dropped.

As the number of high-cost loans in Howard County declined, the extreme disparities in rates of high-cost lending between different racial and ethnic groups have also declined. In 2006, upper-income Black and Hispanic households had far higher rates of high-cost originations than Whites: 47.1% for upper-income Blacks and 46.7% for upper-income Hispanics versus 14.1% for upper-income Whites. By 2008, the rate of high-cost lending was still higher for upper-income Black and Hispanic households, but the rate was closer to that for White households: 9.9% for upper-income Black households, 5.3% for upper-income Hispanic households, and 2.9% for upper-income White households.

Analyzing high-cost lending by census tract can identify areas where there are disproportionately larger numbers of high-cost loans. Map 13 displays the distribution of high-cost loans across Howard County for 2008. Most census tracts in which mortgages were originated had one to five high-cost loans. The highest high-cost loan percentage among tracts with at least 10 loans was tract 6029 (an area of Asian concentration and an LMI area), in which 5 of 18 loans (27.8%) qualified as high cost. This was the exception, as no other tract with at least 10 loans had a high-cost loan rate higher than 16.2%.

4. Assessment of Current Fair Housing Policy, Programs and Activities

This section provides a summary of current County policies, programs, and activities that affirmatively further fair housing. In addition, the progress that the County has achieved in affirmatively furthering fair housing since its 1996 AI is summarized. Finally, a discussion of the fair housing advocacy organizations in Howard County is included.

A. Current Fair Housing Policy

i. Howard County Human Rights Law

The Howard County Human Rights Law states that Howard County shall foster and encourage growth and development so that all persons have an equal opportunity to pursue their lives free of discrimination. The ordinance states it is unlawful to discriminate against a person based on: race, creed, religion, disability, color, sex, national origin, age, occupation, marital status, political opinion, sexual orientation, personal appearance, familial status, and source of income. Potential housing, law enforcement, employment, public accommodations, and financing complaints are accepted by the Howard County Office of Human Rights.

The Law describes the roles, duties, and responsibilities of the Office of Human Rights (OHR) and the Human Rights Commission (HRC). The HRC, established in 1969, is composed of 11 members and one non-voting student member. The duties and responsibilities of the HRC include recommending a civil rights policy to the County Executive and County Council. Additionally, the Commission has the authority to administer surveys and studies concerning human rights, conditions, and problems. County Code also grants the HRC the authority to file a complaint when there is reason to believe a pattern or practice of discrimination exists. Furthermore, the HRC can hold immediate hearings regarding patterns of discrimination.

The Office of Human Rights, established in 1975, is an entity of Howard County government that seeks to eradicate discrimination, increase equal opportunity, and protect and promote human rights in the County. The Human Rights Administrator heads OHR and is appointed by the County Executive. OHR is responsible for administering and enforcing the County's Human Rights Law, including but not limited to investigating complaints of discrimination to determine whether a violation of the Law has occurred. In addition, OHR is authorized to attempt to eliminate violations of the Law by conference, conciliation, and persuasion.

Unlawful housing acts and practices cited in the County's Human Rights Law include the following:

- Make, or cause to make, printing or publishing of any notice, statement or advertisement regarding the sale or rental of a dwelling that indicates any preference or limitation.

- Represent to a person that any dwelling is not available for inspection, sale, or rental, when the dwelling is in fact available.
- Refuse to negotiate for the sale or rental of a dwelling.
- Refuse to sell or rent a dwelling after the making of a bona fide offer.
- Refuse to make a dwelling available.
- Restrict the terms, conditions, or privileges of sale or rental of a dwelling.
- Include any discriminatory covenants in the transfer, sale, rental, or lease of housing.
- Honor, exercise, attempt to honor, or attempt to exercise any discriminatory restrictive covenant.
- Refuse to permit, at the expense of a disabled individual, reasonable modification of existing premises occupied or to be occupied by the disabled individual if the modifications may be necessary to afford the disabled individual full enjoyment of the dwelling. For a rental dwelling, the tenant agrees that, upon vacating the dwelling, he or she will restore the interior of the dwelling to the condition that existed before the modification, with reasonable wear and tear expected.

The County's Human Rights Law also covers unlawful acts in relation to multiple listings and broker associations, access to multi-list services, property values and changes in the nature of a neighborhood, solicitation, the accessibility and usability of multi-family dwellings, and coercion.

Procedures and requirements for the process of filing a complaint are also outlined in the Howard County Human Rights Law. A person aggrieved by an alleged unlawful housing practice may file a complaint with OHR within one year of the practice having occurred. All complaints must be filed in writing, either under oath or by affirmation, and should be on a form provided by the Office. Within ten days of the filing of a complaint, OHR will acknowledge receipt of the complaint and advise the complainant of the applicable time limits and options provided by law. The Human Rights Administrator must begin an investigation within 30 days of receiving the complaint. Within 100 days of the filing of the complaint, the Administrator performs an investigation and determines, based on facts, whether probable cause exists to believe that an unlawful housing practice occurred or is about to occur.

If the Administrator determines that probable cause exists to believe that an unlawful housing practice has occurred or is about to occur and no conciliation has been reached within 30 days of notifying the parties, the Administrator notifies the Commission of the finding and the lack of conciliation. The Commission, in turn, can then issue a charge on behalf of the complainant for further proceedings.

B. Progress since the Previous AI

The Howard County Department of Housing and Community Development (DHCD) is a member of the Baltimore Regional Cooperative (BRC), a group of entitlement jurisdictions assembled solely for the purpose of expanding fair housing practices.

The previous Baltimore Regional Analysis of Impediments to Fair Housing Choice (AI) was completed in 1996 and identified the following impediments in the greater Baltimore region:

- Fair housing choices for persons with disabilities
- Lack of affordable housing
- Mortgage and lending practices
- Public and assisted housing
- Sales and rental practices
- Lack of educational and outreach programs
- Lack of zoning and land use policies
- Hate and bias crimes
- Infractions of fair housing law

Howard County is involved in several programs and initiatives designed to expand affordable housing choice for persons with disabilities. For example, DHCD commissions a research group to complete an annual rental housing survey. As part of this survey, accessible rental units in the County are identified. A list of these accessible units is available to program participants with disabilities upon request. In addition, funding to rehabilitate group homes for the disabled has been provided through the County's CDBG and HOME entitlement programs. Staff members from the Office of Human Rights (OHR) continue to participate in Housing Choice Voucher Program briefings to explain the source of income portion of the County Fair Housing Law to program participants and to landlords on an ad hoc basis. OHR also works with the Department of Citizen Services and Disability Services to inform persons with disabilities and landlords of their rights and responsibilities under the law.

The second impediment identified in BRC's 1996 AI was an overall lack of affordable housing. In order to address the growing need for affordable housing in Howard County, the County Executive convened an Affordable Housing Advocates Committee in 2007. The committee is comprised of approximately 30 members representing a diverse group of stakeholders in the County including the business community, County administration, advocacy organizations, community organizations, faith-based groups, and for-profit and non-profit organizations. The committee has worked with the Director of DHCD and the Housing and Community Development Advisory Board to create a strategic action plan to achieve the goal of affordable housing expansion. The following is a list of achievements completed and evidence of groundwork completed towards future successes:

- Completed the acquisition of Columbia Landing by the Housing Commission, which is a 300-unit mixed-income apartment community.
- Commenced the redevelopment of Guilford Gardens, a 100-unit townhouse and apartment complex owned by the County with 52 project-based units which will be converted into a 269-unit mixed-income community with both project-based and tax credit units.
- Completed and fully leased Ellicott Gardens, a 106-unit County-owned affordable apartment community that targets working professionals earning 50-60% of the average median income.
- Completed and fully leased Parkview at Emerson, an 80-unit affordable apartment community targeting seniors earning 0-60% of the average median income.

Howard County has been working to address existing impediments in area mortgage and lending practices. For example, DHCD continues to conduct housing counseling workshops. In response to the foreclosure crisis, the County hosted a three-part education series in conjunction with Consumer Credit Counseling Services (CCCS). The first session, titled "Balancing Act" covered the topics of budgeting, spending, and credit. "Saving – Making a Little into a Lot" involved financial strategies to accrue enough savings to purchase a home. The final session, "Homeownership – Securing Your Most Valuable Asset," taught about the ins and outs of buying a home and how to prevent foreclosure. DHCD has also teamed up with CCCS to address the barriers to a variety of home mortgage products that exist for area families. CCCS will work with area applicants to create debt management plans and provide case management services.

The Howard County Housing Commission manages a portfolio of affordable housing units and also administers the County's Housing Choice Voucher Program. To address the issues related to public and assisted housing identified in the 1996 AI, new construction properties and redevelopment projects are now designed as mixed-income communities to limit the concentration of poverty, to ensure financial viability, and to foster optimal maintenance of affordable, safe, decent, and sanitary housing. The Housing Commission has also placed an increased emphasis on self-sufficiency activities and education to help residents remove barriers to fair housing choice. These efforts include individual case management, workshops, and referrals to other agencies and services.

Another impediment identified in the 1996 AI was discriminatory practices in the sale and rental of housing. To address this impediment, Howard County distributed a brochure titled "Fair Housing: Know Your Rights under the Law" in English, Russian, Spanish, Vietnamese, Korean, and Chinese. In order to affirmatively further fair housing, the Office of Human Rights (OHR) briefs persons in the Section 8 Program on Howard County's Fair Housing Law and in particular the source of income basis, in order to educate participants on how to recognize discrimination and where to seek assistance.

To address the lack of educational and outreach programs, DHCD educates the public about various available housing services by participating in several outreach activities including annual, monthly, and quarterly events. For example, the County was an exhibitor at the 50 Plus Expo, County Councilman Ball's Money Matters, the Leadership Howard County Resource Fair, the Howard County Public School Teacher's Expo, and

the Howard County Fair. In addition, the County also hosted or co-hosted several events including the Landlord General Information Meeting, the Moderate Income Housing Unit (MIHU) Program's Open Enrollment Meetings, the Come Home to Howard County Housing Fair, Residential Landlord-Tenant Relationship Fundamentals Workshop, Foreclosure Forums, and public and team member meetings for various programs and developments.

Howard County has created a Hate Bias Incidents (HBIs) Task Force to present victim panels to perpetrators who are sentenced to come before them. The HBI Task Force works to foster awareness, to educate, to promote the understanding of, and to eliminate hate bias incidents and crimes in the community. The Task Force meets monthly and panels are held on an as-needed basis.

In order to address infractions of the County Fair Housing Law, the Office of Human Rights (OHR) continues to investigate complaints in accordance with the County Human Rights Law provided in Section 12.207 and 12.212 Iii(c) of the Howard County Code. In addition, OHR also participates in several educational outreach efforts, including briefing Section 8 voucher holders on their rights, providing a course for continuing education credit for area Realtors on fair housing issues, and participating in area housing fairs.

C. Current Fair Housing Programs and Activities

i. Howard County Human Rights Commission

As part of its fair housing activities, the Human Rights Commission (HRC) sponsors an annual Fair Housing Poster Contest for school children in Howard County. This has resulted in the publication and distribution of calendars from the winning posters, posters being framed and hung in County Offices, an award event for the winners, and posters being displayed at the Columbia Mall. This is a creative and unique way to spread the word on the importance of fair housing issues in the County.

ii. Howard County Office of Human Rights

Each year, the Howard County Office of Human Rights (OHR) hosts an informational booth at the "Come Home to Howard County" Housing Fair. This fair takes place each April. OHR's booth highlights fair housing laws, rights, and responsibilities.

Another one of OHR's publicity efforts is its website, which is part of the larger Howard County website (www.howardcountymd.gov). This website is updated regularly with important fair housing information, including dates for workshops, the process for filing a complaint, etc.

In addition, OHR has developed and implemented a three-hour credit course for Howard County Realtors entitled "Fair Housing in Howard County." This training is done in conjunction with the Howard County Association of Realtors. Participants receive three credit hours of fair housing training for their license renewal through the Maryland Real Estate Commission. This is an annual event and has taken place for the last two years. In 2010, approximately 25 Realtors/brokers attended the course.

HCH & OHR co-sponsored the Annual Residential Workshops – Fair Housing Landlord and Tenant Rights and Responsibilities – which were held at Howard County Community College in July 2010. Additionally, OHR regularly conducts training for respondents as a part of settlement agreements. OHR investigators provide briefings twice a week on the County Fair Housing Law for all Housing Choice Voucher holders so that they can recognize discrimination. Participants are also informed of their rights and responsibilities under the Howard County Fair Housing Law.

D. Fair Housing Advocacy Organizations

Howard County is part of a larger metropolitan region served by a variety of fair housing advocacy organizations. These entities include Baltimore Neighborhoods, Inc., an active office of the American Civil Liberties Union, Legal Aid, the Greater Baltimore Urban League, and Citizens Planning and Housing Association, among others. The activities and impacts of regional advocates are discussed in the regional section of the AI.

i. Howard County Office of Human Rights

The Howard County Office of Human Rights enforces the Howard County Code that prohibits discrimination in employment, housing, public accommodations, financing, and law enforcement on the basis of age, occupation, marital status, political opinion, sexual orientation, personal appearance, and source of income in addition to the federally protected classes. OHR accepts complaints of discrimination and also monitors racial, religious, and ethnic incidents (i.e. hate crimes). When a complaint is filed, an investigation is conducted and conciliation attempted. If conciliation fails and probable cause has been determined, a hearing is held before the Human Rights Commission.

The Office of Human Rights is managed by the Human Rights Administrator, who is appointed by the County Executive. Other staff members at OHR include one full-time compliance officer, one full-time investigator, two full-time secretaries, one full-time community worker, one part-time intake investigator, and one part-time community worker.

According to the Howard County Code, Sections 12.200 through 12.218, the official functions and activities of the Office of Human Rights are as follows:

- Monitor hate bias incidents (HBI)
- Enforce Human Rights Laws of Howard County
- Work to eliminate discrimination in the County
- Investigate complaints and resolve disputes
- Sponsor the annual Human Rights Awards
- Implement the Martin Luther King, Jr. Holiday Celebration

There are currently 75 open cases at OHR. The majority of these cases, 83%, involve potential employment discrimination. Eleven (11) cases, or 15%, involve housing. 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 these, 833 cases (73%) involved employment, 162 cases (14%) involved housing, and 129 cases (11%) involved public accommodations. In addition, nine of these cases involved law enforcement while only one involved financing.

OHR does not handle landlord tenant complaints or problems. All landlord-tenant issues are referred to Baltimore Neighborhoods, Inc. (BNI) or the Howard County Office of Consumer Affairs. In addition, OHR refers calls from individuals seeking housing to the Howard County Department of Housing and Community Development. Any issues having to do with rental housing permits are referred to the Howard County Department of Inspection, Licenses, and Permits.

If a resident needed help in resolving a fair housing issue, they might know to contact OHR due to OHR's extensive outreach efforts. OHR has an informative website, is listed in the County telephone directory, and is listed in the Howard County Outreach booklets and website published by Citizen Services and the Association of Community Services. OHR also participates in outreach activities by attending area fairs and workshops and disseminates informational brochures at these functions.

To file a complaint, a resident must contact OHR via phone, email, or a visit into the office. An investigator will then discuss the issues and determine the jurisdiction for the case. Complainants have one year from the date of the alleged violation to file a complaint. The complainant must complete a pre-complaint questionnaire and the case is then assigned to an investigator. The investigator has 15 days to determine if the case will continue or be dismissed. If it is dismissed, the complainant can go the Human Rights Commission. If the case is continued, a Finding of Fact is issued and probable or no probable cause is determined. Mediation is offered immediately.

Complainants have one year from the date of the alleged violation to file a complaint in the area of housing. All other areas (employment, public accommodation, law enforcement and finance) must file within 6 months. The Complainant must complete a pre-complaint questionnaire and the case is then assigned to an investgator. OHR has 15 days to determine if the case will be authorized for investifation or be dismissed. If it is dismissed the complainant can go to the Human Rights Commission to request a reconsideration of the dismissal. If the case is authorized, a Finding of Fact is issued and probable or no cause is determined. If it is probable cause, the OHR attempts conciliation of the matter. Settlement discussions may occur at any time during the investigation and mediation is always offered to the parties.

5. General Fair Housing Observations

The following observations were noted throughout the previous sections of the AI. These issues are based on the primary research collected and analyzed and the numerous interviews and focus group sessions conducted for this report. They help to establish context for the impediments included in the following section. While none of these observations individually rose to the level of an impediment to fair housing choice in Howard County, the issues remain noteworthy in that they continue the underlying circumstances which define the local fair housing climate.

1. **Minorities have continued to increase as a percentage of total population.**

   The total population in Howard County has surged nearly 132%, although growth appears to have moderated during the most recent decade. Whites now account for 63.7% of the population, down from 85.5%. This has resulted from a nearly fivefold increase in minority residents from 17,218 in 1980 to almost 100,000 in 2008. Asian/Pacific Islanders have experienced the largest percentage increase, growing 1335.8% over nearly 30 years. Hispanics have seen their numbers rise to over 12,000 from less than 1,500. Blacks remain the largest racial minority at 47,000 residents.

   The five languages with the highest number of persons who speak English less than "very well" in Howard County are Korean, Spanish, Chinese, Urdu (spoken in Pakistan), and Hindi. To determine whether translation of vital documents is required, a HUD entitlement community must calculate the number of LEP persons in a single language group who are likely to qualify for and be served by the Urban County's programs. Census data revealed there are potentially three languages with significant numbers of native speakers who also speak English less than "very well." These languages include Korean, Spanish, and Chinese. For each of these languages, the number of LEP persons exceeds 1,000. For this reason, the County should perform a four-factor analysis to determine the extent to which the translation of vital documents is warranted.

2. **There are 13 areas of racial or ethnic concentration in the County.**

   There are 13 areas of minority concentration (Black, Asian/Pacific Islander, and/or Hispanic) in Howard County. These areas are located in Savage, Columbia, Laurel and Ellicott City.

3. **Howard County is moderately segregated, as determined by dissimilarity indexing.**

   Overall, Howard County is the most integrated of the five units of government included in this report. Achieving full integration among White persons and Black persons in the County would require 36.2% of Black residents moving to a different location within the County. In addition to a White/Black index of 36.2, Howard County has a White/Hispanic index of 28.1 and a White/Asian

index of 18.1. These numbers indicate that Hispanics and Asians are less segregated than Black residents.

4. **Members of the protected classes have significantly lower incomes.**

   Median household income among Blacks was equivalent to only 69% that of Whites in 2000 and poverty among Blacks was more than twice the rate of White households. Hispanics fared only slightly better with a median income equivalent to 73% that of White households. Consequently, Blacks and Hispanics will have greater difficulty finding affordable rental units or homes to purchase.

   Persons with disabilities were three times as likely to live in poverty than persons without disabilities. Among all persons with a disability, 9.8% lived in poverty compared to only 3.1% of persons without a disability.

   Female-headed households accounted for almost 47% of all families living in poverty in 2000. Consequently, securing affordable housing will be especially difficult for this segment of the population.

   Families with at least one foreign-born parent were more likely to have lower incomes than families with native-born parents. Over 14% of families with children and at least one foreign-born parent had incomes of less than 200% of poverty compared to 7% of families with children with native parents.

5. **Several areas identified as impacted areas of racial and/or ethnic concentration are also areas of concentration of low and moderate income persons.**

   Several LMI areas around Ellicott City, Columbia, Waterloo, and Savage were noted to also be areas of minority concentration. Of the 29 low and moderate income census block groups, 16 are located within impacted areas of Black, Asian, and/or Hispanic residents. As a result, areas of racial and ethnic concentration are more likely to also be areas of concentration of low and moderate income persons.

   A majority of HCVP voucher holders reside in the central and eastern parts of the County near Columbia, Jonestown, Simpsonville, Guilford, and Savage. Affirmative mobility initiatives are needed to provide LMI minorities with expanded housing choice outside of these areas of concentration.

6. **Blacks experienced a higher rate of unemployment than Whites.**

   Blacks were twice as likely to be unemployed than Whites and had the highest unemployment rate in 2008 at 6.7%, compared to 3.1% among Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

7. **Minority households were more likely to experience housing problems, compared to White households.**

   Between January 2007 and June 2008, Columbia was estimated to have the highest number of foreclosure filings in Howard County. However, North Laurel and Savage-Guilford had the highest estimated foreclosure rates at 2%

each. Many of the census tracts in these areas qualify as LMI areas or areas of racial or ethnic concentration.

Among all owner households with incomes below 80% of the median family income in 2000, 62.8% of White households experienced housing problems compared to 75.1% of Blacks and 86.6% of Hispanics.

Among renter households, more than 75% of Hispanic households reported housing problems compared to 68.3% of Whites and 66.4% of Blacks.

8. **The public housing inventory maintained by the Howard County Housing Commission (HCHC) is inadequate, especially for members of the protected classes.**

Black households constitute the majority of public housing residents, voucher holders and applicant households on the waiting lists for public housing or vouchers.

Households including a person with disabilities constituted 23.6% (82) of the waiting list for public housing and 23.4% (747) of the waiting list for Housing Choice Vouchers.

There are 3,190 households on the waiting list for vouchers. Of these households, 59% are families with children. These applicants compete for over 1,000 available vouchers. Furthermore, the waiting list for public housing has a total of 348 households competing for only 50 units of family public housing. These waiting list characteristics further indicate a high demand for affordable and accessible family rental housing in Howard County.

Notably, limitations in federal funding pose serious limitations on the ways in which the Commission can address the existing need for affordable rental housing. The voucher authority and budget extended to HCHC are limited, so any increase in payment standard would subtract from the resources available to assist the greatest number of households possible. Additionally, HUD no longer provides funds to facilitate the expansion of public housing in its traditional form.

6. Potential Impediments to Fair Housing Choice

The remaining observations collected during the development of the AI constitute the potential impediments or barriers to fair housing choice listed in this section. These impediments are linked to remedial strategies in the Fair Housing Action Plan.

i. Public Sector – Administrative

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.

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 reflect the County's diversity.

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

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-moderate income census tracts, low-moderate income residents, and minorities.

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.
- Multi-family 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.

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% 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 is increasingly critical.

As of the AI's writing, there were 11 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%) 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.

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 10 years old. The process to update the plan is forthcoming and provides an opportunity to incorporate fair housing initiatives.

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.

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.

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 argued 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.
- There is confusion 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 landlord and Section 8 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 Section 8 staff members.

iii. Private Sector

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% 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.

7. Fair Housing Action Plan

Based on the general observations and potential impediments to fair housing choice included in this report, the following Fair Housing Action Plan is proposed.

	Planned Action Year				
	2012	2013	2014	2015	2016
Goal: Establish an 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	TBD				
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. 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.	•	•	•	•	•
Task: 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			•		
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	•	•	•	•	•

cont'd ...

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 work collaboratively with 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			•	•	•

8. SIGNATURE PAGE FOR THE URBAN COUNTY OF HOWARD COUNTY

By my signature I certify that this report fulfills the requirement that the County, as part of its certification to affirmatively further fair housing, complete an Analysis of Impediments to Fair Housing Choice. The County intends to take appropriate actions to overcome the effects of the impediments identified through the analysis and to maintain records reflecting actions in this regard.

County Executive _____

Date _____

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

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: 07/07/2020	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: 9820 Patuxent Woods Drive	
Street2: Suite 224	
* City: Columbia	
County/Parish: Howard	
* State: MD: Maryland	
Province:	
* Country: USA: UNITED STATES	
* Zip / Postal Code: 21046	
e. Organizational Unit:	
Department Name: Housing & Comm. Developement	Division Name: Community Planning & Grants
f. Name and contact information of person to be contacted on matters involving this application:	
Prefix: Ms.	* First Name: Kellly
Middle Name: A.	
* Last Name: Cimino	
Suffix:	
Title: Director	
Organizational Affiliation: Howard County Dept. of Housing & Community Development	
* Telephone Number: 410-313-6190	Fax Number: 410-313-5960
* Email: kcimino@howardcountymd.gov	

OMB Control No: 2506-0117 (exp. 06/30/2018)

Application for Federal Assistance SF-424

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

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.):

Add Attachment | Delete Attachment | View Attachment

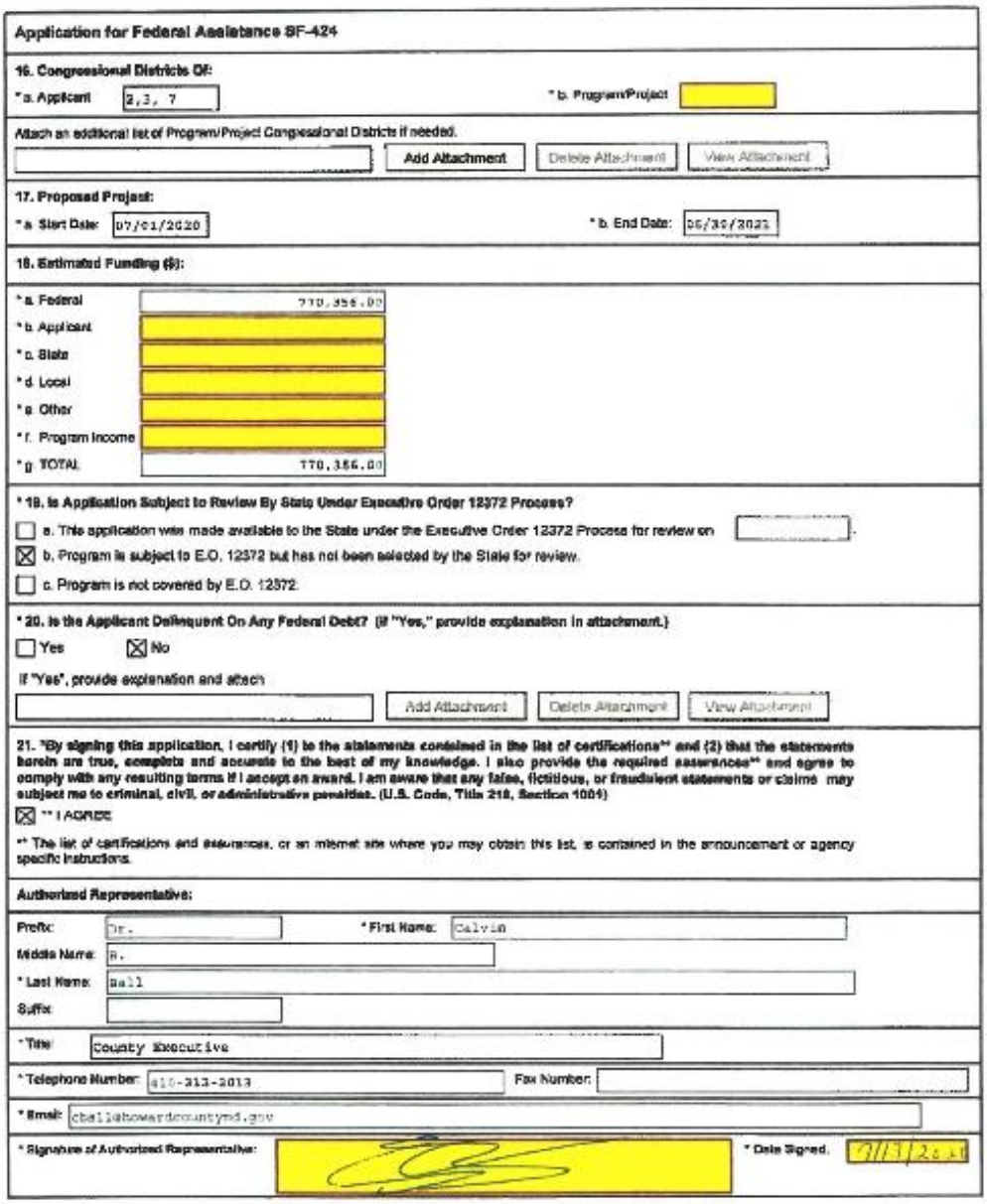
*** 15. Descriptive Title of Applicant's Project:**

See Attachment A.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

1



Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 2,3, 7 — * 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: 07/01/2020 — * b. End Date: 06/30/2021

18. Estimated Funding ($):

* a. Federal	770,356.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	770,356.00

*** 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:	Dr.
* First Name:	Calvin
Middle Name:	B.
* Last Name:	Ball
Suffix:	
* Title:	County Executive
* Telephone Number:	410-313-2013
Fax Number:	
* Email:	cball@howardcountymd.gov
* Signature of Authorized Representative:	
* Date Signed:	7/15/20

SF-424 (CDBG)

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.

OMB Control No: 2506-0117 (exp. 06/30/2018)

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
Howard County, Maryland	7/13/2020

SF-424D (Rev. 7-97) Back

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

7-13-2020
Date

County Executive
Title

Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) FFY2020 [a period specified by the grantee 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.

In addition, 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:

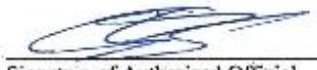
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

7/13/2020
Date

County Executive
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

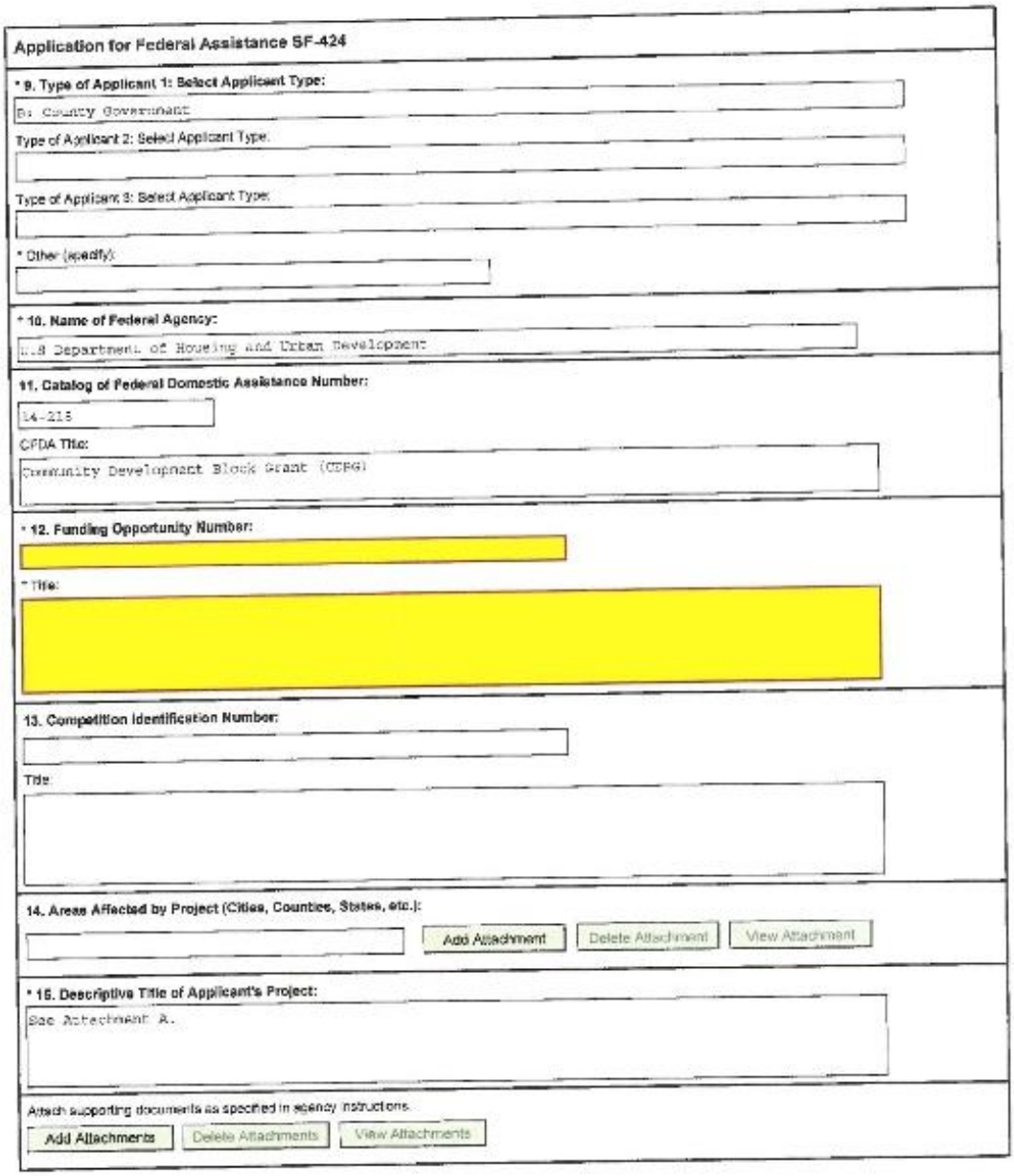
Lobbying Certification

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.

OMB Number: 4040-0004
Expiration Date: 8/31/2016

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: 01/17/2019	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 6000565	* c. Organizational DUNS: 1035471370000	
d. Address:		
* Street1: 9820 Patuxent Woods Drive		
Street2: Suite 224		
* 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: Community Planning and Grants	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Ms.	* First Name: Kelly	
Middle Name: A.		
* Last Name: Cimino		
Suffix:		
Title: Director		
Organizational Affiliation: Howard County Dept. of Housing and Community Development		
* Telephone Number: 410-313-6190	Fax Number: 410-313-6960	
* Email: kcimino@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:

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.):

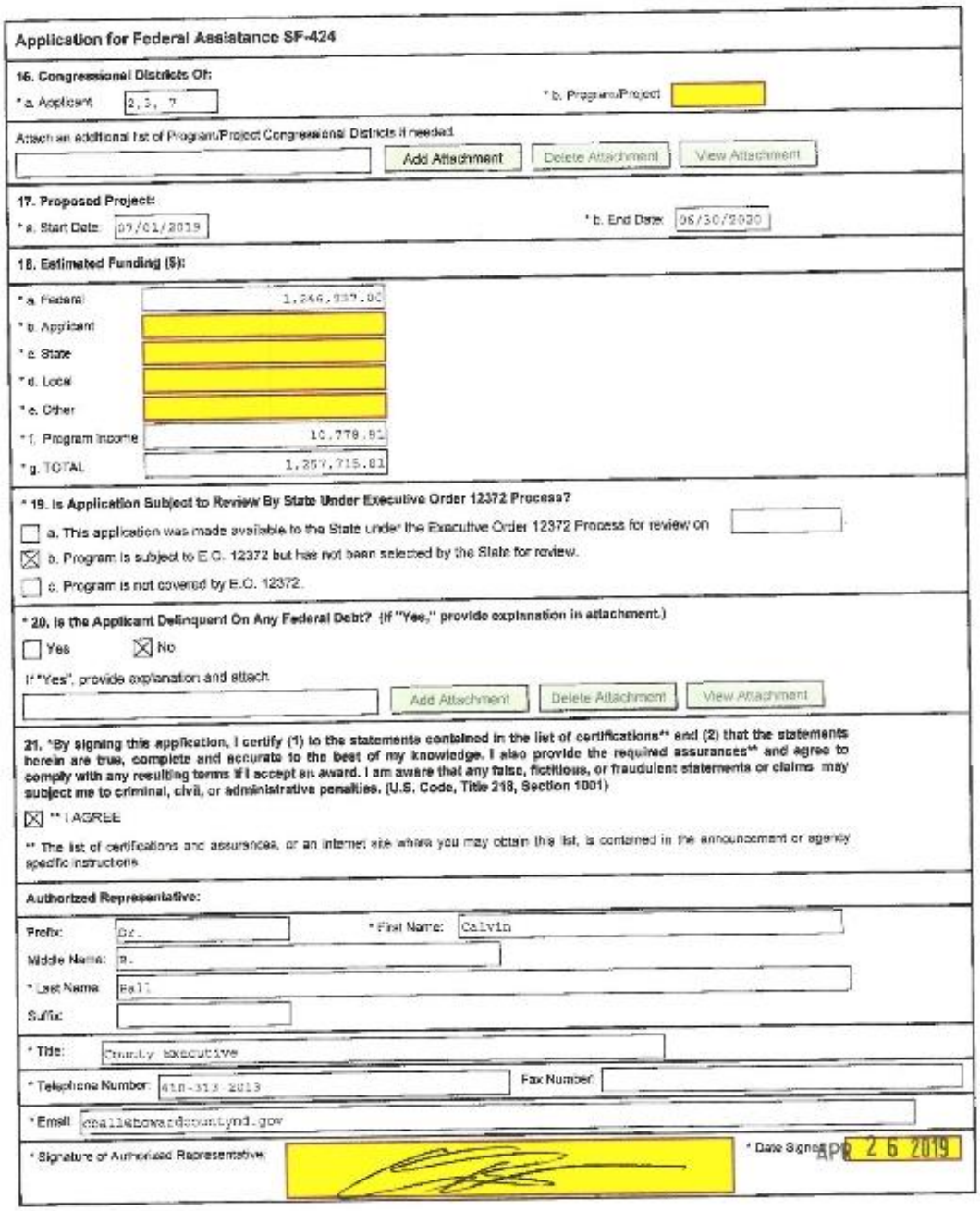
Add Attachment | Delete Attachment | View Attachment

* 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: 2, 3, 7 * 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: 09/01/2019 * b. End Date: 08/30/2020

18. Estimated Funding ($):

* a. Federal	1,246,937.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	10,778.81
* g. TOTAL	1,257,715.81

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

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

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☐ Yes ☒ No

If "Yes", provide explanation and attach

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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:	Dr.
* First Name:	Calvin
Middle Name:	B.
* Last Name:	Ball
Suffix:	
* Title:	County Executive
* Telephone Number:	410-313-2013
Fax Number:	
* Email:	cball@howardcountymd.gov
* Signature of Authorized Representative:	
* Date Signed:	APR 2 6 2019

SF 424 (CDBG)

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.

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 08/31/2019

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
Howard County, Maryland	APR 26 2019 04/17/2019

SF-424D (Rev. 7-97) Back

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

APR 2 6 2019

Signature of Authorized Official

Date

County Executive

Title

Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) FFY2019 [a period specified by the grantee 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.

In addition, 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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

APR 26 2019

Date

County Executive

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

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.

Subsidy layering -- 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 of Authorized Official

APR 2 6 2019
Date

County Executive
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

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.

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:
☐ Preapplication	☒ New
☒ Application	☐ Continuation
☐ Changed/Corrected Application	☐ Revision
	* If Revision, select appropriate letter(s):
	* Other (Specify):
* 3. Date Received: 04/17/2019	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:	[illegible]

d. Address:

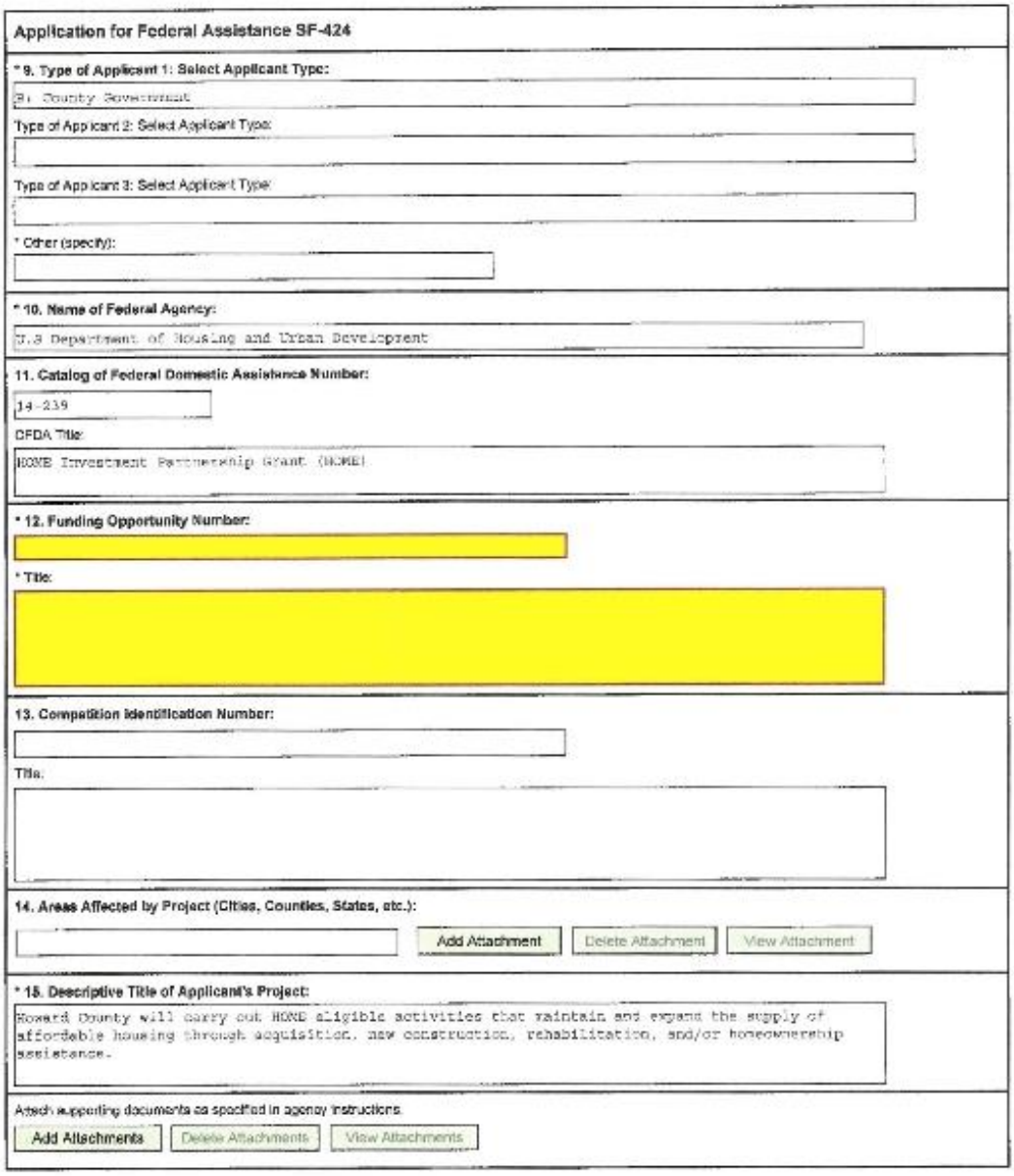
* Street1:	9820 Patuxent Woods Drive
Street2:	Suite 204
* City:	Columbia
County/Parish:	Howard
* State:	MD: Maryland
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	[illegible]

e. Organizational Unit:

Department Name:	Division Name:
Housing and Comm. Development	Community Planning and Grants

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

Prefix: Mr.	* First Name: Kelly
Middle Name: R.	
* Last Name: Simms	
Suffix:	
Title: Director	
Organizational Affiliation: Howard County Dept. of Housing and Community Development	
* Telephone Number: 410-313-6320	Fax Number: 410-313-6360
* Email: [illegible]@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:

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:

14.239

CFDA Title:

HOME Investment Partnership Grant (HOME)

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

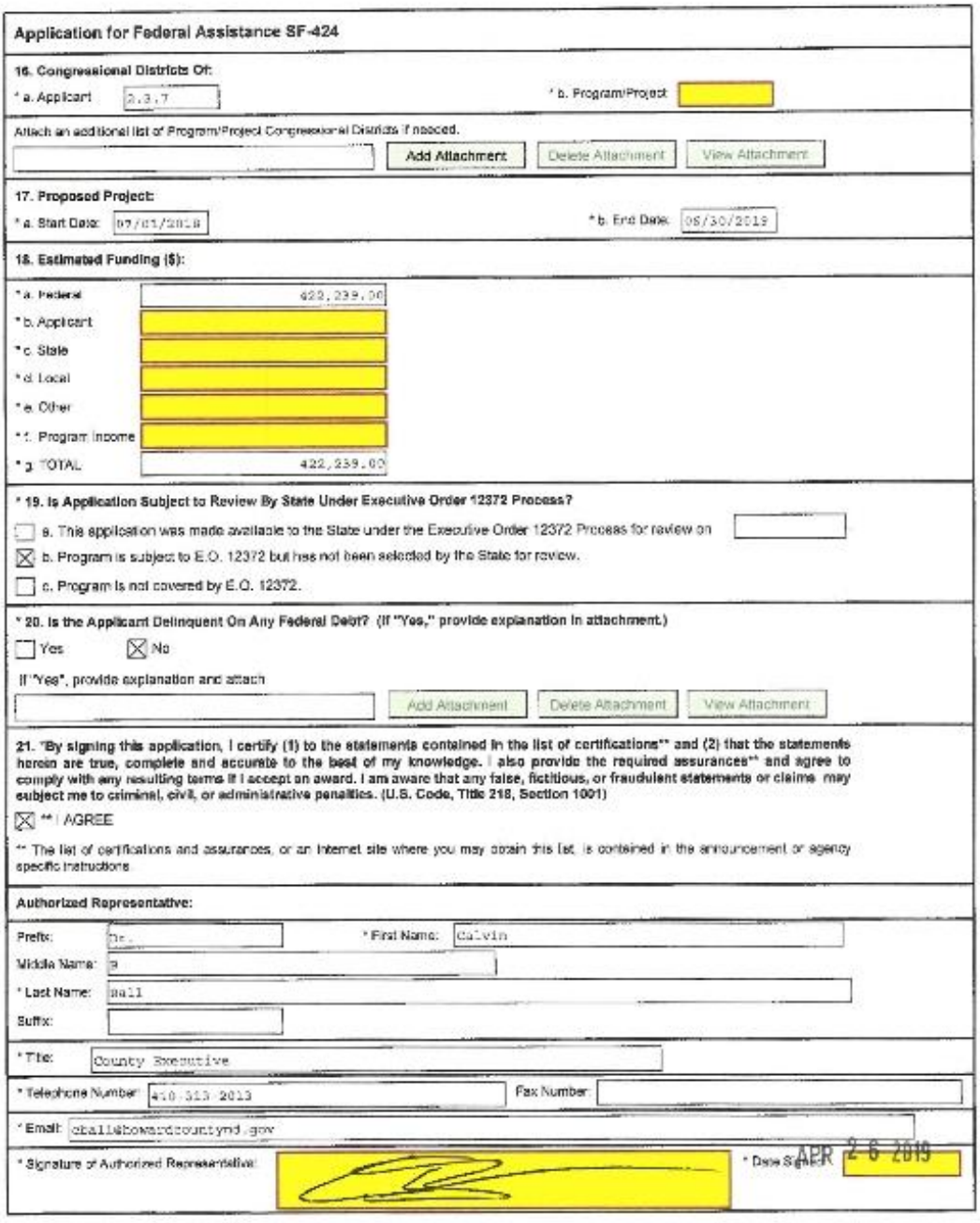
Add Attachment | Delete Attachment | View Attachment

* 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/or 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: 2,3,7 * 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: 07/01/2019 * b. End Date: 06/30/2019

18. Estimated Funding ($):

* a. Federal	422,239.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	422,239.00

* 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: Calvin

Middle Name: W

* Last Name: Ball

Suffix:

* Title: County Executive

* Telephone Number: 410-313-2013 Fax Number:

* Email: cball@howardcountymd.gov

* Signature of Authorized Representative: * Date Signed: APR 26 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042). Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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