

Prince William Area

**FFY 2024
Annual Action
Plan**

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	1
THE PROCESS	7
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)	7
AP-10 Consultation - 91.100, 91.200(b), 91.215(l)	8
AP-12 Participation	13
AP-15 Expected Resources – 91.220(c) (1,2)	14
AP-20 Annual Goals and Objectives	19
AP-35 Projects – 91.220(d)	25
AP-38 Project Summary	26
AP-50 Geographic Distribution – 91.220(f)	38
AP-55 Affordable Housing – 91.220(g)	39
AP-60 Public Housing – 91.220(h)	39
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	40
AP-75 Barriers to affordable housing – 91.220(j)	41
AP-85 Other Actions – 91.220(k)	43
PROGRAM SPECIFIC REQUIREMENTS	45
AP-90 Program Specific Requirements – 91.220(l) (1,2,4)	45
APPENDICES	50

EXECUTIVE SUMMARY

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

Introduction

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes to the Community Development Block Grants (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership (HOME). The new single-planning process was intended to fulfill three basic goals more comprehensively: to provide decent housing, to provide a suitable living environment and to expand economic opportunities. It was called the Consolidated Plan for Housing and Community Development.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlement communities the opportunity to shape these housing and community development programs into effective, coordinated neighborhood and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

Prince William County partners with the cities of Manassas and Manassas Park. This Plan will include data from both these areas, called the Prince William Area.

As the lead agency for the Consolidated Plan, Prince William County hereby follows HUD's guidelines for citizen and community involvement. Furthermore, it is responsible for overseeing citizen participation requirements that accompany the Consolidated Plan.

Prince William County has prepared this Consolidated Plan to meet the guidelines as set forth by HUD and is broken into five sections: The Process, Needs Assessment, Market Analysis, Strategic Plan, and Annual Action Plan.

The Annual Action Plan serves as a one-year planning document that undertakes the goals and objectives as identified in the 5-Year Consolidated Plan. As Planning Year five of the FFY2020-2024 Five-Year Planning Cycle, this plan identifies projects that are designed to meet the goals and strategies as outlines in the Consolidated Plan. This Plan serves as a planning document meeting the federal government statutory requirements in 24 CFR 91.200-91.230, with revisions for preparing a Consolidated Plan and guidance on the use of CDBG, HOME, and ESG funding based on applications to the U.S. Department of HUD. This Action Plan also serves as the baseline for measuring program effectiveness, as reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each fiscal year's funding allocation. This Annual Action Plan will address the allocation of CDBG, HOME, and ESG funds for the FFY2024 (FY2025) Program Year.

However, Federal Funding may change from what we now believe. In that event, the following will occur:

Example of Decrease Funding:

CDBG – If the CDBG allocation is reduced the CDBG Administration would be reduced because the administrative dollars are based upon 20% of the allocation. The remaining CDBG funding is distributed based upon the Prince William County Biannual Population Estimates for the 4th Quarter 2023 and the population estimates for both Manassas City and Manassas Park. Each jurisdiction has funding for the Neighborhood Housing Rehabilitation Program and that program would be reduced to reflect the reduction in funds.

HOME – If the HOME allocation is reduced the HOME Administration would be reduced because the administrative dollars are based upon 10% of the allocation. The remaining HOME funding is distributed based upon the Prince William County Biannual Population Estimates for the 4th Quarter 2023 and the population estimates for both Manassas City and Manassas Park. Each jurisdiction has funding for the First-Time Homebuyer Program (FTHB) and that program would be reduced to reflect the reduction in funds.

ESG – If the ESG allocation is reduced the ESG Administration would be reduced because the administrative dollars are based upon 7.5% of the allocation. The remaining ESG funding is distributed based upon bed count with 60% allocated for Homeless Shelter Operations, funding provided to support the federal Homeless Management Information System (HMIS) required to be used to report data on homeless population. The remaining balance would be obligated for Rapid Re-housing.

Example of Increased Funding:

CDBG – If the CDBG allocation is increased the CDBG Administration would be increased because the administrative dollars are based upon 20% of the allocation. The remaining CDBG funding is distributed based upon the Prince William County Biannual Estimates for the 4th Quarter 2023 and the population estimates for both Manassas City and Manassas Park. Each jurisdiction has funding for the Neighborhood Housing Rehabilitation Program and that program would be increased to reflect the increase in funds.

HOME – If the HOME allocation is increased the HOME Administration would be increased because the administrative dollars are based upon 10% of the allocation. The remaining HOME funding is distributed based upon the Prince William County Biannual Population Estimates for the 4th Quarter 2023 and the population estimates for both Manassas City and Manassas Park. Each jurisdiction has funding for the First-Time Homebuyer Program (FTHB) and that program would be increased to reflect the increase in funds.

ESG – If the ESG allocation is increased the ESG Administration would be increased because the administrative dollars are based upon 7.5% of the allocation. The remaining ESG funding is distributed based upon bed count with 60% allocated for Homeless Shelter Operations, funding provided to support the federal Homeless Management Information System (HMIS) required to be used to report data on homeless population. The remaining balance would be obligated for Rapid Re-housing.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The goals of the CDBG and HOME programs are to provide decent housing, a suitable living environment for the Area's low- and moderate-income residents, and economic opportunities for low-moderate income residents. The County strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities. These goals are further explained as follows:

- Providing decent housing means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.
- Providing a suitable living environment entail improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- Expanding economic opportunities involves creating jobs that are accessible to low- and moderate-income persons; making down payment and closing cost assistance available for low- and moderate-income persons; promoting long term economic and social viability; and empowering low-income persons to achieve self-sufficiency.

Evaluation of past performance

Prince William County's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). These documents state the objectives and outcomes identified in each year's Annual Action Plan and include an evaluation of past performance through measurable goals and objectives compared to actual performance. These documents can be found on the County's website at:

<https://www.pwcva.gov/department/housing-community-development/reports>

Prince William County has been successful in allocating the HUD Office of Community Planning and Development (CPD) funds through CDBG, ESG, and HOME program activities. In Federal Fiscal Year 2022, the County accomplished the following undertakings:

During FFY 2022 (FY23), Prince William County accomplished a variety of activities using CDBG, HOME and ESG funds and CARES ACT Funding through CDBG-CV, and ESG-CV. CDBG funds were able to provide case management services for extended hours for homeless shelter for homeless population assisting 321 extremely low-income persons, CDBG funds were used to provide transportation services to the Homeless population in the Prince William Area serving 323 extremely low-income persons; provided CDBG funding for comprehensive housing financial counseling for approximately 300 persons. OHCD continued to participate in an Intergovernmental regional fair housing alliance along with the Council of Government (COG) to collaborate on a new, rigorous approach to furthering fair housing. CDBG funds were provided to

Prince William County Human Rights Commission in order to perform fair housing testing to local apartment complexes. In addition, during FFY 2022 (FY23) CDBG funds were used to provide homeowner rehab for four (4) low-moderate income owner-occupied households.

During FFY2022 (FY23) HOME funds were used to provide down-payment and closing costs assistance to assist six (06) eligible first-time low-moderate income homebuyers to acquire properties located in the Prince William Area utilizing FY19 and FY20 HOME funds assisting sixteen (16) persons. Of which five (5) households were low income (50% - 60% of AMI) and one (1) household was moderate (below 80% of AMI). ESG funds were used in a variety of shelter operations and rapid re-housing projects which provided assistance to 342 household consisting of 552 extremely low-income persons. ESG-CV funding from the first round was provided to local shelters for Operations, Essential Services and Rapid Re-Housing serving homeless persons in order to Prevent; Prepare and Response to the Coronavirus. ESG-CV Phase II was spent to assist the local domestic violence shelter, for materials to begin the renovation of the shelter allowing

Assistance to OHCD through the CDBG-CV provided through the Emergency Housing Assistance Program, (EHAP) Rental; Mortgage & Utility Assistance to 397 persons who were extremely low, low -moderate income; in order to Prevent; Prepare and Response to the Coronavirus.

Summary of citizen participation process and consultation process

A variety of public outreach and citizen participation was used to develop this Annual Action Plan. One public meeting was held prior to the release of the draft plan to garner feedback. The Plan was released for public review and a public hearing will be held to offer residents and stakeholders the opportunity to comment on the plan.

The County will allow for the Citizen Participation Plan to include virtual/online public hearings in place of, or in addition to, in-person hearings, such as during times of a state of emergency or serious public health emergency, or even as a matter of general practice.

“Substantial Amendment” is defined by Prince William County to be:

- i. A proposed new activity which cannot reasonably be construed to have been included within the programmatic intent of the adopted Annual Action Plan.
- ii. Exceptions may be made to this amendment policy under the following circumstances where uncommitted funds under the CDBG, HOME, ESG and other federally funded allocation plans shall be re-appropriated between categories in response to emergency and/or other contingencies required to meet the intent, public purpose and annual priorities established in the Consolidated Plan. At his/her discretion, the OHCD Director is authorized to reallocate up to 25% of the total federal funds in this manner.

Summary of public comments

The County received one comment, which is included as an attachment with the applicable responses.

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

Not applicable.

Summary

The 2020-2024 Federal Fiscal Year (FY2021-2025) Consolidated Plan outlined the following priority needs:

- **Homelessness:** Homelessness continues to be a high need in the Prince William Area. While the County continues to support efforts that seek to end homelessness, it remains a high priority in the Area. These include homeless prevention activities, emergency shelters, Transitional Housing, permanent supportive housing, HMIS, homeless transportation, and homeless services.
- **Low-to-Moderate Income Housing:** Housing for low to moderate income households is a high priority in the Area due to the number of households with housing problems.
- **Special Needs Populations:** There are numerous special needs populations in the Prince William Area that are in-need. These households have a variety of housing and service needs and continue to be a high priority within the Area. These include the elderly, persons with substance abuse problems, persons with disabilities, and victims of domestic violence. This also includes low-income households in need of public services such as childcare and job training.
- **Public Facilities and ADA Accessibility:** Public Facilities, including youth and community centers, and childcare facilities, and ADA Accessibility continue to be a highly rated need in the Prince William Area.
- **Fair Housing:** Fair Housing continues to be a high priority in the Prince William Area.

These Priority Needs are addressed with the following Goals:

Support Efforts to End Homelessness

Goal: Facilitate an expansion of housing and supportive services offered to homeless families and individuals in Prince William County over a five-year period.

Objective: Continue to provide support for service providers within the Continuum of Care to serve homeless and at-risk households in the Prince William Area.

Promote Fair Housing in the Area

Goal: Plan, Monitor and Administer Entitlement Grant Programs. Evaluate upcoming needs related to affordable housing, fair housing, non-housing, and the non-homeless special needs populations

Objective: Continue to Plan, Monitor and Administer Entitlement Grant Programs and ensure compliance with Federal Regulations in the Prince William Area

Expand Affordable Housing Option

Goal: Improve the condition and availability of affordable housing over a five-year period.

Objectives: Improve the condition of and access to affordable housing options in the Prince William Area.

CHDO Set Aside

Goal: Improve the condition and availability of affordable housing over a five-year period.

Objective: Increase the viability for potential homeownership and rental housing opportunities in the Prince William Area.

Enhance Access to Public Facilities & ADA Accessibility

Goal: Improve living conditions by addressing both housing and non-housing community development for special needs and low to moderate income households over a five-year period, including ADA accessible projects.

Objective: Address community needs through improvements to public facilities.

Provide Support for Public Service Programs

Goal: Help address the needs of homeless and non-homeless and special needs populations in the Prince William Area

Objective: Provide support to public service providers in the Prince William Area to help increase access to public service options

Program Administration

Goal: Support program implementation in the Prince William Area through Program Administration

THE PROCESS

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	PRINCE WILLIAM COUNTY	Office of Housing and Community Development
HOME Administrator	PRINCE WILLIAM COUNTY	Office of Housing and Community Development
ESG Administrator	PRINCE WILLIAM COUNTY	Office of Housing and Community Development

Table 1 – Responsible Agencies

Narrative

The lead agency for the development of the Fiscal Year 2025 Federal Fiscal Year (FFY2024) Annual Action Plan and the administration of CDBG, HOME, and ESG is the Office of Housing and Community Development (OHCD) of Prince William County.

Consolidated Plan Public Contact Information

Joan S. Duckett, Director of Housing
Office of Housing and Community Development Prince William County
Dr. A.J. Ferlazzo Building
15941 Donald Curtis Dr. Suite 112
Woodbridge, VA 22191-4217

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

Introduction

Prince William County consults with a variety of agencies and outside entities on a regular basis in order to establish ongoing relationships and continue to maintain consistency with our understanding of community and housing needs and priorities.

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

The County has ongoing relationships with several housing providers working on housing development activities. The County provides a forum for assisting these agencies grow and meet their own targeted clientele to include on-going training and workshops providing the most current program requirements and updates. The County also works to utilize Housing Choice Vouchers (previously referred to as Section 8) from the federal government to address the housing needs of the County's lowest income households. Through the Continuum of Care process, the County maintains relationships with mental health providers, homeless shelter and services providers, and other governmental agencies with specific responsibilities for homeless individuals and families. The County also participates in a variety of other coalitions that seek to address other issues that relate to housing and service needs.

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.

County staff works actively and continually with the Prince William County Continuum of Care. Staff participates in regularly scheduled meetings, serves on committees, and point-in-time surveys. The Office of Housing & Community Development (OHCD) has provided administrative support to supplement Continuum of Care initiatives and determines the ESG allocations to the local shelters for operational costs, and Rapid Re-Housing services through Emergency Solutions Grant funding to the various agencies within the membership of the Prince William County Continuum of Care.

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

Staff from Prince William County participates in the Continuum of Care regular meetings, serves on committees within the Continuum of Care and participates in ongoing training, working with area service providers to include County resources, to the extent possible, in the provision of services to homeless individuals and families in Prince William County.

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

Staff from Prince William County Office of Housing & Community Development (OHCD) participated in the preparation of both the DRAFT and FINAL Housing Chapter of the County's Comprehensive Plan. OHCD participated in public meetings to receive the community's comments and outlook for affordable housing within Prince William County. Housing is a key component to achieving the County's vision of being a community of choice for all residents. The input of the Housing Chapter addresses affordability concerns and ensures that the implicit connections with mobility, environment, health, and equity are addressed to support the building of healthy equitable communities. OHCD is working collaboratively with the County's Planning Department in the creation of an Affordable Dwelling Unit Ordinance and an Affordable Housing Trust Fund.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ACTS - Action in Community Through Service
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
2	Agency/Group/Organization	City of Manassas
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
3	Agency/Group/Organization	Good Shepherd Housing Foundation
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
4	Agency/Group/Organization	Northern Virginia Family Service
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non- Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
5	Agency/Group/Organization	Hilda Barg Homeless Shelter

	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
6	Agency/Group/Organization	Dawson Beach
	Agency/Group/Organization Type	Services – Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.
7	Agency/Group/Organization	Streetlight Outreach Ministries
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in the planning and review process.

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

The County was inclusive in its consulting process and made every attempt to include a variety of agencies.

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	Prince William County Continuum of Care	The Strategic Plan provides a set of goals for addressing homelessness, with are supported by the Prince William County Continuum of Care and its participating agencies.

Table 3 – Other local / regional / federal planning efforts**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

Prince William County works collaboratively with the cities of Manassas and Manassas Park in the development of programs to address housing, homeless, and community development needs, and other local issues covered by the Consolidated Plan.

Narrative (optional):

Prince William County continues to work with broadband providers to expand access. In 2021, Prince William County started the Emergency Broadband Benefit, with which eligible households may receive a discount of up to \$50 per month towards broadband service.

AP-12 Participation

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

During the development of the County's FFY 2024 Annual Action Plan, the County undertook a variety of public outreach methods to gather public input and comment. These outreach efforts included two public input meeting and a public review meeting.

Each public meeting had public notices and met the County's guidelines in its Citizen Participation Plan. The public notifications are included in the Appendix. The County will allow for the Citizen Participation Plan to include virtual/online public hearings in place of, or in addition to, in-person hearings, such as during times of a state of emergency or serious public health emergency, or even as a matter of general practice.

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
1	Public Meeting	Non-targeted/ broad community	A public input meeting will be held on March 14, 2024, at 10:30am via webinar.	No comments received during meeting.	Not applicable.
2	Public Hearing	Non-targeted/ broad community	A public review meeting will be held March 27, 2024, at 1:00pm via webinar. And in person Dr. A.J. Ferlazzo Building Housing Conference Room	No comments received during meeting. One comment received during the comment period and is included in the Attachments.	Not applicable.

Table 4 – Citizen Participation Outreach

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

Introduction Anticipated Resources

The following amounts represent the funding for the 2024 FFY.

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	2,559,056	260,037	4,659,149	7,478,242	0	CDBG funds include this years annual allocation, as well as over \$4.6 million in prior year resources. CDBG funds are directed towards housing, public facilities, public services, fair housing, and homeless supportive services.

HOME	public federal	–	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	794,850.65	200,000	9,003,442	9,998,292.65	0	HOME funds include this years annual allocation and over \$9.9 million in prior year resources. HOME funds are directed towards housing activities such as first time homebuyer assistance and tenant based rental assistance.
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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public – federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	228,267	0	0	228,267	0	ESG funds include this years annual allocation. Funds are directed towards service providers to provide shelter, outreach and homeless prevention activities.

Table 53 - 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

Home Leverage/Match

Matching requirements for the HOME Program will be met through deferred taxes on eligible HOME funded non-profit owned properties, below market rate first trust financing through Virginia Housing (VH) previously known as Virginia Housing Development Authority, and local Housing Preservation Development Funds as available provided to HOME eligible projects.

Emergency Solutions Grant Match

Recipients of ESG funds are required to provide a dollar-for-dollar match. The match must be for the specific project for which ESG funding is requested and must be received and expended within the grant year. Eligible sources of match are:

- 1) Donated Supplies: Donated goods such as clothing, furniture, equipment, etc. Include the source and an estimated value for all donated goods.
- 2) Cash Donations or Grants: Private donations or grants from foundations, nonprofits, or local, state, and federal sources. A single grant may serve as the required match.
- 3) Value of Donated Building: The fair market value of a donated building in the year that it is donated. The building must be proposed for ESG-related activities and must not currently be in use for these activities. The verification should state when the building was donated and for what purpose, the current use of the building, and how long the building has been used for its current purpose. A licensed real estate salesperson, broker or licensed appraiser may be used to determine the fair market value of the property.
- 4) Rent or Lease: Rent paid for space currently used to provide services to the homeless must include the source of funds used to pay rent. The fair market rent, or lease value of a building owned by or space that is donated (rent-free) to the organization is also an acceptable match resource. To document fair market value a letter from a licensed real estate salesperson, broker or licensed appraiser that specifies the location of building, square footage, value per square foot, and total lease or rent value based on 12-month occupancy.
- 5) Salaries: Any staff salary paid with general operating funds or grant funds (CDBG, United Way, etc.). The position(s) used as match must be involved in ESG related activities and the hours utilized for match must be for hours worked for ESG related activities. For each position include the title, annual salary, percentage of time dedicated to ESG activities, source of funds and the dollar amount proposed as match.
- 6) Volunteers: Time and services contributed by volunteers, with a value not to exceed \$5 per hour. [Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community.]

Match has historically been from County General Revenue provided to non-profits who operate emergency shelters or transitional housing programs.

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

None currently identified. The County will continue to evaluate opportunities to use public lands for future development.

Discussion

The County has programmed the CDBG, HOME, and ESG programs for the Federal Fiscal Year 2024 program year. This sum included the annual allocation, program income, and reprogrammed funds from previous program years. These funds will be used to operate a range of private and public services.

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	Support Efforts to Combat Homelessness	2020	2024	Homeless	Countywide	Homelessness	ESG: \$228,267 CDBG: \$35,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 27 Beds Homelessness Prevention: 27 Persons Assisted Homeless Overnight Shelter: 271 Persons
2	Promote Fair Housing in the Area	2020	2024	Administration	Countywide	Fair Housing	CDBG: \$30,000	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Expand Affordable Housing Options	2020	2024	Affordable Housing	Countywide	Low to Moderate Income Households	CDBG: \$4,860,594 HOME: \$9,499,111.64	<p>Homeowner Housing Rehabilitated: 10 Household Housing Unit</p> <p>Rental Housing Rehabilitated: 8 Household Housing Unit</p> <p>Tenant Based Rental Assistance: 22 households</p> <p>Direct Financial Assistance to Homebuyers: 8 Households Assisted</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 140 Persons Assisted</p>
4	CHDO Set Aside	2020	2024	Affordable Housing	Countywide	Low to Moderate Income Households	HOME: \$419,696	Other: 1 Other
5	Enhance Access to Public Facilities & ADA Accessibility	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Public Facilities & ADA Accessibility	CDBG: \$1,960,837	Other: 6 Other

6	Provide Support for Public Service Programs	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Special Needs Populations Public Facilities & ADA Accessibility Homelessness	CDBG: \$80,000	Public service activities other than Low/Moderate Income Housing Benefit: 618 Persons Assisted
7	Program Administration	2020	2024	Administration	Countywide	Fair Housing Special Needs Populations Public Facilities & ADA Accessibility Low to Moderate Income Households	CDBG: \$511,811 HOME: \$79,485	Other: 1 Other

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Support Efforts to Combat Homelessness
	Goal Description	<p>Goal: Facilitate an expansion of housing and supportive services offered to homeless families and individuals in Prince William County over a five-year period.</p> <p>Objectives: Continue to provide support for service providers within the Continuum of Care to serve homeless and at-risk households in the Prince William Area. This will include the following actions:</p> <ol style="list-style-type: none"> 1. Support and encourage non-profit participation in a Homeless Management Information System (HMIS). 2. Provide ESG funds to Rapid-Re-housing Program to assist homeless individuals and households with income at or below 30% of Area Median Income, sleeping in an emergency shelter; a place not meant for human habitation; or in a hospital or institution for up to 180 days but previously housed in an emergency shelter or place not meant for human habitation prior to entry into the hospital or institution; or graduating from, or timing out of, a transitional housing program; or victims of domestic violence. 3. Provide ESG funds for operation and supportive services for Emergency Shelter facilities that provide shelter for homeless persons and families and persons at risk of becoming homeless. 4. Provide ESG funds for operation and supportive services for Emergency Shelter, Domestic Violence Shelter and Transitional Housing facilities that provide shelter for homeless persons and families and persons at risk of becoming homeless. 5. Provide ESG funds for operation and supportive services for Transitional Housing and Emergency Shelter facilities that provide transitional housing for homeless persons and families transitioning to permanent assisted housing or other housing. 6. Provide ESG funds for HMIS Support to offset costs for Domestic Violence Shelter reporting. 7. Provide CDBG funds for operation and supportive services for Transitional Housing and Emergency Shelter facilities that provide transitional housing for homeless persons and families transitioning to permanent assisted housing or other housing. 8. Transportation for Homeless and Low-Moderate Income 9. Provide CDBG funds for Special Needs Populations: Low-income households in need of public services for afterschool programs, as well as a public facility for Youth and community center where afterschool programs are offered. 10. Provide CDBG funds for rehabilitation of CDBG funded properties making them ADA accessible, for extremely low-income persons with developmental disabilities. 11. Provide HOME funds for Tenant Based Rental Assistance for families that are very-low; low and moderate income for a period of five-years and encourage participation in the volunteer Self Sufficiency Program

2	Goal Name	Promote Fair Housing in the Area
	Goal Description	<p>Goal: Plan, Monitor and Administer Entitlement Grant Programs. Evaluate upcoming needs related to affordable housing, fair housing, non-housing, and the non-homeless special needs populations</p> <p>Objective: Continue to Plan, Monitor and Administer Entitlement Grant Programs and ensure compliance with Federal Regulations. This will include the following actions:</p> <ol style="list-style-type: none"> 1. Fair Housing Training & Outreach: The Office of Housing and Community Development (OHCD) will enter into a Memorandum of Agreement with the Prince William County Human Rights Commission to perform Fair Housing Media Awareness & Outreach.
3	Goal Name	Expand Affordable Housing Options
	Goal Description	<p>Goal: Improve the condition and availability of affordable housing over a five-year period.</p> <p>Objectives: Improve the condition of and access to affordable housing options in the Prince William Area. These actions will include:</p> <ol style="list-style-type: none"> 1. Provide Major Rehabilitation funding to homeowners who are low and moderate-income at 80% or below the median income for the Greater Prince William Area with housing repair needs under Neighborhood Housing Rehabilitation Program (NHRP). 2. Provide Major Rehabilitation funding to owners/landlords to assist in increasing the availability of affordable rental housing units for low- and moderate-income at 80% or below the median income households and housing choice voucher holders under the Prince William Housing Choice Voucher program (previously known as Section 8). 3. Provide funding for down payment and closing cost for first time homebuyer purchasing homes for owner occupancy. Eligible applicants are low and moderate-income at 80% or below the median income for the Greater Prince William Area, First-Time Homebuyer Program (FTHB). 4. Provide Funding for low- and moderate-income (LMI) Prince William County residents for financial budgeting, credit counseling; pre- and post-purchase homeownership counseling to assist first- time homebuyers.

4	Goal Name	CHDO Set Aside
	Goal Description	<p>Goal: Improve the condition and availability of affordable housing over a five-year period.</p> <p>Objective: Increase the viability for potential homeownership and Rental housing opportunities. This includes the following actions:</p> <ol style="list-style-type: none"> 1. Provide funding to CHDO organization for operating funds and development fees to develop affordable housing for low-moderate income homeownership and rental housing.
5	Goal Name	Enhance Access to Public Facilities
	Goal Description	<p>Goal: Improve living conditions by addressing housing and non-housing community development for special needs and low to moderate income households over a five-year period.</p> <p>Objective: Address community needs through improvements to community-based public facilities.</p>
6	Goal Name	Provide Support for Public Service Programs
	Goal Description	<p>Goal: Help address the needs of homeless and non-homeless special needs populations in the Prince William Area</p> <p>Objectives: Provide support to public service providers in the Area to help increase access to public service options. This includes the following actions:</p> <ol style="list-style-type: none"> 1. Provide funding for public service providers that serve low to moderate income households and special needs populations including, but not limited to, the elderly, victims of domestic violence, persons with substance abuse disorders, and persons with disabilities.
7	Goal Name	Program Administration
	Goal Description	<p>Goal: Support program implementation in the Prince William Area through Program Administration</p> <p>These actions include:</p> <ol style="list-style-type: none"> 1. Support CDBG programs with CDBG Program Administration funds 2. Support ESG programs with ESG Program Administration funds 3. Support HOME programs with HOME Program Administration funds

AP-35 Projects – 91.220(d)

Introduction

The following represent the projects for FFY 24.

Projects

#	Project Name
1	Emergency Solutions Grant Project
2	Dawson Beach Transitional Housing Case Management
3	CDBG Program Administration
4	HOME Administration
5	Fair Housing Activities
6	County Administered Neighborhood Housing Rehabilitation Program
7	County Rehab Administration
8	Community Housing Development Organization (CHDO) Set-Aside
9	First Time Homebuyer Program
10	Comprehensive Housing Counseling (County & City)
11	Streetlight Outreach Ministries, Case Management Outreach
12	PWC Department of Social Services Homeless Transportation
13	INSIGHT, INC. Rehabilitation
14	Affordable Rental Rehab Program
15	Dawson Beach Transitional Housing Property Management
16	HOME – Tenant Based Rental Assistance Program
17	HOME – ARP Tenant Based Rental Assistance Program
18	The ARC Greater Prince William ADA Playground Renovation
19	Hilda Barg Homeless Prevention Center ADA Playground Renovation
20	ARC (INSIGHT) Acquisition

Table 55 – Project Information

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

The projects were selected based on the projects proposals received in accordance with their consistency with the priorities established in the Federal Fiscal Year 2020-FY2024 Consolidated Plan. The projects meet the enumerated needs and goals, as outlined in the Consolidated Plan, and put into action with this Federal Fiscal Year 2024- County Fiscal Year 2025 Annual Action Plan. Agencies were also selected on their ability to undertake the proposed activities, thus limiting the number of obstacles to meeting needs throughout the Prince William Area.

AP-38 Project Summary

Project Summary Information

1	Project Name	Emergency Solutions Grant Project
	Target Area	Countywide
	Goals Supported	Support Efforts to Combat Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$228,264
	Description	Sub-recipient support for development/administration of continuum of care and homeless supportive services \$20,630 ESG funding, ACTS. PWC Department of Social Services, overnight shelter, homeless prevention & supportive shelter, ESG Funding \$49,283. Supportive services for NVFS/SERVE shelter \$49,283. Supportive services for Dawson Beach Transitional Housing \$15,472. HMIS Support \$42,901 and ESG Administration \$17,120. ESG funds support efforts to reduce homelessness, increase access to housing, and help promote self-sufficiency. Aligned with the FFY2020-2024 Support Efforts to Combat Homelessness goal.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	PWC Department of Social Services for the Ferlazzo/Navigation Homeless Shelter, Hilda Barg Homeless Prevention Center & Support Shelter (total together 431), ACTS, provides emergency shelter services for 67 persons, NVFS/SERVE shelter services for 251 persons, Dawson Beach Transitional Housing services for 27 persons
	Location Description	Various locations around the County, including shelters, government facilities and non-profit agencies
2	Planned Activities	Sub-recipient support for development/administration of continuum of care and homeless supportive services \$20,630 ESG funding, ACTS. PWC Department of Social Services, overnight shelter, homeless prevention & supportive shelter, ESG Funding \$49,283. Supportive services for NVFS/SERVE shelter \$49,283. Supportive services for Dawson Beach Transitional Housing \$15,472. HMIS Support \$42,901 and ESG Administration \$17,120.
	Project Name	Dawson Beach Transitional Housing Case Management
	Target Area	Countywide
	Goals Supported	Support Efforts to Combat Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$35,000

	Description	Funding allocated to assist Dawson Beach Transitional Housing programs to provide 7 housing units of transitional housing scattered over 7 acres, as well as property management. This project is aligned with the FFY2020-2024 Support Efforts to Combat Homelessness goal by providing case management to households experiencing homelessness to increase stability and reduce the likelihood of returning to homelessness.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	27 persons
	Location Description	Dawson Beach Transitional Housing
	Planned Activities	CDBG Funding allocated to assist Dawson Beach Transitional Housing programs to provide 7 housing units of transitional housing scattered over 7 acres; providing housing and supportive services for homeless families with children for a period up to two years. Services are aimed at economic betterment, financial planning and budgeting, job skills, mental health issues, etc. to 27 persons. 14011 Dawson Beach Rd., Woodbridge 22191.
3	Project Name	CDBG Program Administration
	Target Area	Countywide
	Goals Supported	Program Administration
	Needs Addressed	Low-to-Moderate Income Housing Special Needs Populations Public Facilities & ADA Accessibility Fair Housing
	Funding	CDBG: \$511,811
	Description	\$283,454 CDBG Funding for General Program Administration, Coordination, and Oversight; \$108,357 CDBG Funding for CDBG Administration; and \$90,000 CDBG Funding for Homeownership Program Administration.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Administrative costs. No direct benefit
	Location Description	Office of Housing and Community Development

	Planned Activities	Develop, revise, implement and evaluate the day-to-day operation of CDBG entitlement program. Activities include program design, grant administration, Subrecipient compliance monitoring, program outreach, public relations, training, and technical assistance to potential and current project sponsors to include Prince William County, Manassas City and Manassas Park.
4	Project Name	HOME Administration
	Target Area	Countywide
	Goals Supported	Program Administration
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	HOME: \$79,485
	Description	Develop, revise, implement and evaluate operation of the HOME program. Activities include grant administration, citizen participation, program outreach and technical assistance.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Program administration, no direct benefit.
	Location Description	Office of Housing and Community Development
	Planned Activities	Develop, revise, implement and evaluate operation of the HOME program. Activities include grant administration, citizen participation, program outreach and technical assistance.
5	Project Name	Fair Housing Activities
	Target Area	Countywide
	Goals Supported	Promote Fair Housing in the Area
	Needs Addressed	Fair Housing
	Funding	CDBG: \$30,000
	Description	The Office of Housing and Community Development will enter into a Memorandum of Agreement with the Prince William County Human Rights Commission to perform Fair Housing Activities. Results will be made part of the CAPER concerning Fair Activities. This project is aligned with the county's goal to promote fair housing, including increasing fair housing knowledge and removing barriers.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Housing Training & Outreach. No direct benefit
	Location Description	PWC Human Rights Commission, 15941 Donald Curtis Dr. Woodbridge, 22191
	Planned Activities	The Office of Housing and Community Development will enter into a Memorandum of Agreement with the Prince William County Human Rights Commission to perform Fair Housing Activities in the Prince William County Area. The results will be made part of the CAPER concerning Fair Housing.

6	Project Name	County Administered Neighborhood Housing Rehabilitation Program
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	CDBG: \$2,550,459
	Description	(\$946,907 Rehab plus \$230,037 Anticipated Program Income; \$1,164,312 CDBG Carry Over; \$147,928 Manassas City and \$61,275 Manassas Park); 10 housing units assisted and additional units to be assisted annually, 15941 Donald Curtis Drive #112, Woodbridge 22191 (Administrative Office) This project supports efforts to increase sustainable and affordable housing options in the Prince William Area through renovation, aligning with the County's goal to expand affordable housing options.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 10 low to moderate income households will be assisted through these activities
	Location Description	Office of Housing and Community Development
	Planned Activities	The County administers, on an annual basis, a neighborhood housing rehabilitation program, the purpose of which is to improve low- and moderate-income owner-occupied housing. The main objective is to reduce the number of substandard housing units in the Prince William Area. Assistance is in the form of a loan for the rehabilitation of the property. Preference is given to extremely low income (below 30% of area median income), elderly and disabled households. The rehabilitation Program is for Prince William County, cities of Manassas and Manassas Park residents.
7	Project Name	County Rehab Administration

	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	CDBG: \$240,000
	Description	\$240,000 CDBG administrative costs associated with Neighborhood Housing Rehabilitation Program. This project supports efforts to increase sustainable and affordable housing options in the Prince William Area through renovation, aligning with the County's goal to expand affordable housing options.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 10 households will be assisted through these activities
	Location Description	Office of Housing and Community Development
8	Planned Activities	The County administers, on an annual basis, a neighborhood housing rehabilitation program, the purpose of which is to improve low- and moderate-income owner-occupied housing. The main objective is to reduce the number of substandard housing units in the Prince William Area. Assistance is in the form of a deed of trust for the rehabilitation of the property. Preference is given to extremely low income (below 30% of area median income), elderly and disabled households. The rehabilitation Program is for Prince William County, cities of Manassas and Manassas Park residents.
	Project Name	Community Housing Development Organization (CHDO) Set-Aside
	Target Area	Countywide
	Goals Supported	CHDO Set Aside
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	HOME: \$419,696
	Description	The HOME program mandates 15% of the annual allocation is set-a- side for housing development activities undertaken by non-profit housing development organizations. Funding provided for acquisition and/or renovation of property used as permanent supportive housing. (\$119,228 & \$300,458 carry-over). This project supports efforts to increase sustainable and affordable housing options in the Prince William Area through providing funds to CHDOs, aligning with the County's goal to set aside funds for CHDOs.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	One unit will be developed through this program, benefiting one low-moderate income household.
	Location Description	Office of Housing and Community Development
	Planned Activities	Provide funding to CHDO organization for operating funds and development fees to develop affordable housing for low-moderate income homeownership and rental housing
9	Project Name	First Time Homebuyer Program
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	HOME: \$ 3, 3300550300,550
	Description	\$532,308 HOME Allocation and \$200,000 Program Income, \$2,477,412 Carry-over and \$17,984 Manassas Park; \$45,846 Manassas City. Down-payment and eligible closing cost assistance provided to low- and moderate-income first-time homebuyers in Prince William County, Manassas City or Manassas Park. This project supports efforts to increase sustainable and affordable housing options in the Prince William Area through proving homebuyers' assistance, aligning with the County's goal to expand affordable housing options.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 8 low- and moderate-income households will be provided down payment/closing cost assistance.
	Location Description	Office of Housing and Community Development
	Planned Activities	Down-payment and eligible closing cost assistance provided to low- and moderate-income first-time homebuyers in Prince William County, Manassas City or Manassas Park, 15941 Donald Curtis Drive #112, Woodbridge 22191 (Administrative Office)
10	Project Name	Comprehensive Housing Counseling (County & City)
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	CDBG: \$70,135

	Description	\$70,135 (\$60,580 CDBG Program allocated for PWC to assist 115 persons; \$9,555 CDBG Program allocated for Manassas City to assist 25 persons); Eligible applicants are low and moderate-income at 80% or below the median income citywide. Decent Housing/Affordability This project supports efforts to increase sustainable and affordable housing options in the Prince William Area through housing counseling, aligning with the County's goal to expand affordable housing options.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 140 low- and moderate-income residents will be provided Pre and Post Homeownership education and financial counseling services through these activities.
	Location Description	Cooperative Extension, 8033 Aston Ave #105, Manassas, VA 20109
	Planned Activities	Funding provided to Cooperative Extension Service to provide to low - and moderate-income (LMI) Prince William Area (PWC, Manassas and Manassas Park) residents credit counseling, pre- and post- purchase homeownership counseling to assist first-time homebuyers, information regarding protections established under the Fair Housing Act. Payments will be made based upon completion of the Financial Assessment Clinic and Homeownership Workshops.
11	Project Name	Streetlight Community Outreach Ministries Case Management
	Target Area	Countywide
	Goals Supported	Provide Support for Public Service Programs
	Needs Addressed	Homelessness
	Funding	CDBG: \$40,000
	Description	Provide CDBG funds to Streetlight Community Outreach Ministries for Case Management Operations and Supportive Services for Transitional Housing and Emergency Shelter providers that provide housing and supportive services for homeless persons and families transitioning to permanent assisted housing or other housing. This project supports efforts to increase services and support self-sufficiency for households experiencing homelessness and aligns with the County's goal to provide support to public service programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 50 persons
	Location Description	1550 Prince William Parkway, Woodbridge, VA 22191

	Planned Activities	Provide CDBG funds to Streetlight Community Outreach Ministries for Case Management Operations and Supportive Services by conducting street/campsite outreach designed to provide essential services necessary to reach out to unsheltered homeless people for the purpose of connecting unsheltered homeless people with emergency shelter, housing, or critical services; and to provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.
12	Project Name	PWC Department of Social Services Homeless Transportation
	Target Area	Countywide
	Goals Supported	Provide Support for Public Service Programs
	Needs Addressed	Special Needs Populations
	Funding	CDBG: \$40,000
	Description	The project will provide funding (\$40,000 CDBG) to provide transportation for homeless population in the Prince William Area from streets to local shelters, transportation between shelters or to and from medical clinics, detoxification facilities, public assistance office, and other local service providers. This project supports efforts to increase services and support self-sufficiency for households experiencing homelessness and aligns with the County's goal to provide support to public service programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 200 persons
	Location Description	Countywide
	Planned Activities	The project will provide \$40,000 in CDBG Funding to assist Prince William County Department of Social Services (DSS) to provide transportation for homeless population in the Prince William Area from streets to local shelters, transportation between shelters or to and from medical clinics, detoxification facilities, public assistance office, and other local service providers.
13	Project Name	INSIGHT, INC. Rehabilitation
	Target Area	Countywide
	Goals Supported	Enhance Access to Public Facilities & ADA Access
	Needs Addressed	Public Facilities & ADA Accessibility
	Funding	CDBG: \$797,250

	Description	CDBG: \$350,000 FY25 Plus FY23 & 24 Carry-over funds (FY23 \$297,250, Carry-over funds FY24 \$150,000). The project will provide funding of \$350,000 rehabilitation and ADA compliance of properties owned by ARC which were previously purchased with CDBG funds. ADA accessibility will provide easier access for persons with developmental disabilities. This project helps increase access for people with disabilities to access public facilities, creating more equitable access to services, and aligns with the County's goal to enhance access to public facilities and ADA.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 2 to 3 houses
	Location Description	Countywide
	Planned Activities	The project will provide funding towards rehabilitation and ADA compliance on existing properties currently assisting extremely low-income persons with developmental disabilities.
14.	Project Name	Affordable Rental Rehab Program
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	CDBG \$2,000,000
	Description	\$2,000,000 carry-over CDBG Funds - will be used to rehabilitate rental units in Prince William County. This is designed to increase access to sustainable and affordable housing in the area and aligns with the goal to expand affordable housing options.
	Target Date	6/30/2025
	Location Description	Office of Housing and Community Development
	Planned Activities	Provide assistance to rehabilitation affordable rental units in the Prince William County area.
15.	Project Name	Dawson Beach Transitional Housing Property Management
	Target Area	Countywide
	Goals Supported	Enhance Access to Public Facilities & ADA Access
	Needs Addressed	Public Facilities & ADA Accessibility
	Funding	CDBG: \$166,000

	Description	Funding allocated to assist Dawson Beach Transitional Housing programs to provide 7 housing units of transitional housing scattered over 7 acres, as well as property management.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	27 persons
	Location Description	Countywide
	Planned Activities	CDBG Funding allocated to assist Dawson Beach Transitional Housing programs to provide 7 housing units of transitional housing scattered over 7 acres; providing housing and supportive services for homeless families with children for a period up to two years. Services are aimed at economic betterment, financial planning and budgeting, job skills, mental health issues, etc. to 27 persons. 14011 Dawson Beach Rd., Woodbridge 22191.
16.	Project Name	HOME – Tenant Based Rental Assistance Program
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	HOME: \$2,847,988 (Carry-Over & Program Income)
	Description	Provide Tenant Based Rental Assistance to Low-Moderate income households; with rental assistance for up to five-years or depletion of funding
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 22 households
	Location Description	Countywide
	Planned Activities	Provide assistance to program eligible individual households to help them afford the housing costs of market-rate units. 1st year and additional years as funding available
17	Project Name	HOME ARP Tenant Based Rental Assistance Program.
	Target Area	Countywide
	Goals Supported	Expand Affordable Housing Options
	Needs Addressed	Low-to-Moderate Income Housing
	Funding	HOME-ARP \$3,350,574
	Description	Provide Tenant Based Rental Assistance to Low-Moderate income households; with rental assistance until depletion of funding, for Qualified population \$2,847,988 & \$502,586 Administrative Costs

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 22 households
	Location Description	Countywide
	Planned Activities	Provide assistance to rehabilitation affordable rental units in the Prince William Area.
18	Project Name	The ARC Greater Prince William ADA Playground Renovation
	Target Area	Countywide
	Goals Supported	Enhance access to Public Facilities and ADA Access
	Needs Addressed	Public facilities and ADA accessibility
	Funding	CDBG \$418,753
	Description	\$418,753 Prior Year CDBG Funds - will increase access to playground equipment to benefit low to moderate households win Prince William. These efforts are aligned with the goal to enhance public facilities and ADA access by providing sustainability and accessibility for public facilities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 100 households
	Location Description	13505 Hillendale Drive, Woodbridge, VA 22193
	Planned Activities	The project will provide funding of \$600,000 for acquisition and installation of age-appropriate playground equipment to include accessible playground equipment at the Muriel Humphrey Childcare Center, to provide low- and moderate-income (LMI) families with children from age six to eighteen years old access to ADA playground equipment.
19	Project Name	Hilda Barg Homeless Prevention Center ADA Playground Renovation
	Target Area	Countywide
	Goals Supported	Enhance access to ADA playground equipment within the homeless shelters
	Needs Addressed	Public facilities and ADA accessibility
	Funding	CDBG \$229,014
	Description	\$229,014 Prior Year CDBG Funds - will increase access to playground equipment to benefit low to moderate households win Prince William. These efforts are aligned with the goal to enhance public facilities and ADA access by providing sustainability and accessibility for public facilities.

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Homeless families residing at the shelter will benefit from the activity allowing for ADA access.
	Location Description	14945 Jefferson Davis Highway, Woodbridge, VA 22191
	Planned Activities	The project will provide funding towards acquisition and installation of age-appropriate playground equipment to include accessible playground equipment at the Hilda Barg Homeless Prevention Center.
20	Project Name	ARC (INSIGHT) Acquisition
	Target Area	Countywide
	Goals Supported	Enhance Access to Public Facilities & ADA Access
	Needs Addressed	Public Facilities & ADA Accessibility
	Funding	\$350,000
	Description	The project will provide funding of \$350,000 CDBG to provide purchase property to be used for housing of persons with developmental disabilities. This project is enhancing access to public facilities through the acquisition of a property. This will provide an affordable solution for the future utilization of a group home, establishing sustainability for the on-going use of this property as a site for people with developmental disabilities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1 Housing Unit
	Location Description	Countywide
	Planned Activities	The project will provide funding of \$350,000 towards acquisition. The property selected will be used as a group home for persons with developmental disabilities.

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

Much of the funding from the CDBG and HOME programs is available for use in any of the CDBG neighborhoods or countywide, depending on the specifics of the designated activities. Also, some funding is available according to individual benefit rather than area benefit. It is, therefore, difficult to provide reasonable projections of the distribution of funds by target area. The numbers below are strictly estimates based on experience.

Geographic Distribution

Target Area	Percentage of Funds
Countywide	90
CDBG Eligible Areas	10

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed allocation of funds is based on federal funding requirements for each formula-allocated grant. Areas of low to moderate-income concentration and certain areas of high minority concentration are targeted. Areas of low homeownership and deteriorating housing conditions were also considered in the targeting process.

Discussion

The distribution of funds by target area is projected to be primarily countywide due to use of funds for administrative, non-profit support, and individual benefit-oriented programmatic uses of the funds. The remaining funds are estimated to be spread through smaller CDBG-eligible areas.

AP-55 Affordable Housing – 91.220(g)

Introduction

The following goals are the affordable housing goals for FYY 2024. This will be accomplished through the use of HOME and CDBG funds, as described in the Projects details. It is expected that the County will provide an additional 27 homeless households with housing and 18 non-homeless households with housing, totaling 45 households.

One Year Goals for the Number of Households to be Supported	
Homeless	27
Non-Homeless	18
Special-Needs	
Total	45

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	88
The Production of New Units	
Rehab of Existing Units	18
Acquisition of Existing Units	8
Total	18

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-6o Public Housing – 91.220(h)

Introduction

Prince William County does not have any public housing.

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

Prince William County does not have any public housing.

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

Prince William County does not have any public housing.

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

Discussion

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

Introduction

Funding from the Emergency Solutions Grant allocation is used to support non-profit homeless services providers in Prince William County.

- (1) Street Outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.
- (2) Emergency Solutions Grant funds may be used for costs of providing essential services to homeless families and to individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.
- (3) Homelessness Prevention funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place.
- (4) Rapid Re-Housing Assistance funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.
- (5) Relocation and Stabilization Services funds may be used to pay financial assistance to housing owners, utility companies and other third parties.
- (6) HMIS funds may be used to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area.

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 Prince William County Continuum of Care, the coalition of local homeless service agencies, conducts annual surveys of homeless individuals, including unsheltered persons. These surveys serve to help focus agency activities for the coming year, as well as provide documentation in response to HUD program requirements. ESG funding includes street outreach activities.

Addressing the emergency shelter and transitional housing needs of homeless persons

Programs proposed for Federal Fiscal Year 2024 - County Fiscal Year 2025 involve ESG Funds being provided to local non-profits for operation and supportive services to address needs of homeless persons, through the supportive housing and homeless prevention through the Hilda Barg Homeless Prevention Center together providing for 30 beds. The Dawson Beach Transitional Housing Program will provide transitional housing beds for 27 people. ACTS and NVFS/SERVE will provide emergency shelter services for 126 homeless persons. Total number of persons projected to be served are 239.

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

Proposed funding for the ESG program includes activities targeting improvements in the areas of Rapid Re-housing and homeless prevention. Other funding during the Federal Fiscal Year 2024 - County Fiscal Year 2025 Annual Action plan year include providing supportive services for persons in transitional housing to develop job skills, financial planning and other skills that promote self-sufficiency. These programs are designed to shorten the period households experience homelessness and help prevent households from returning to homelessness by promoting self-sufficiency. The County's FFY2024 projects also include additional housing and supportive services to help shorten the time households experience homelessness, increase access to affordable housing, and help prevent the return to homelessness.

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.

Homeless prevention is a major focus of the participants in the Continuum of Care. Agencies include homeless prevention as a support program in conjunction with the provision of shelter and other support services. The County is funding homeless prevention activities in the Federal Fiscal Year 2024-County Fiscal Year 2025 Annual Action Plan.

Discussion

The participants in the Continuum of Care work closely together to meet the needs of homeless individuals and families through the continuum of services coordinated through the partnership. The County participates in the planning efforts and provides a framework through the ESG funding process.

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

Introduction:

The County's 2020-2024 Consolidated Plan found that the top barriers to development of affordable housing include the lack of affordable housing development policies, the cost of land or lot, and the Not in My Back Yard (NIMBY) mentality. No other barriers have been identified as barriers. However, the County is currently starting the process to undertake its 2025-2029 Consolidated Plan, This process will evaluate any additional barriers to the development of affordable housing.

Additionally, Prince William County Office of Housing along with the County Planning and Development Service agencies have created a DRAFT Affordable Dwelling Unit (AfDU) Ordinance which includes the creation of an Affordable Housing Trust Fund. This DRAFT AfDU Ordinance is

scheduled for Board Of County Supervisors approval in January 2025, with program implementation as estimated for May 2025.

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

During the 2025 FY, the County will continue to create additional opportunities for access to affordable housing through subsidized housing, first-time homebuyers' assistance, rental assistance and the Affordable Dwelling Unit Ordinance and Affordable Housing Trust fund, if approved by the County Board of County Supervisors. These efforts are designed to help mitigate the impacts in removal of barriers to affordable housing.

Discussion: ‘

Prince William County has worked to monitor and reduce the impact of public policy on affordable housing development. Market forces have been found to be the main constraint to affordable housing, as found in the Federal Fiscal Year 2021-2024 Consolidated Plan. As such, while the County will continue to monitor barriers to affordable housing, the County does not have any actions planned for Federal Fiscal Year 2024 - County Fiscal Year 2025 to address these market barriers.

AP-85 Other Actions – 91.220(k)

Introduction:

The County currently provides a variety of services to the residents of Prince William County, some funded by CDBG, HOME, and the ESG allocation including CARES Act funds, HOME American Rescue Plan Program (HOME ARP Program) with private, State, and City funding bringing additional assets to bear on these problems. Below are some of the actions currently performed by the County or under consideration for the future.

Actions planned to address obstacles to meeting underserved needs

The County has found that the lack of available resources is the primary obstacle to meeting underserved needs. As such, the County will continue to look for new funding sources to meet the needs of residents in the County. OHCD has received through the Department of Behavioral Health and Development Services (DBHDS) State Rental Assistance Program (SRAP) Vouchers to serve SRAP applicants in order to increase access to mainstream, integrated, independent rental housing options for people in the U.S. Department of Justice Settlement Agreement target population and to increase housing opportunities for the U.S. Department of Justice Settlement Agreement target population by leveraging state rental assistance with local public and private housing resources. Currently OHCD administers 11 project based and 40 tenant based SRAP Vouchers.

OHCD is in negotiations with DBHDS to receive 72 additional SRAP Vouchers for Permanent Supportive Housing, to increase access to supportive, affordable rental housing options for persons with Serious Mental Illness (SMI), as well as to increase housing stability for persons with SMI by providing the supports they need to maintain housing. OHCD anticipates receiving funding for administering these additional SRAP Vouchers in FFY24 (FY25).

Actions planned to foster and maintain affordable housing

The County will consider providing financial assistance for Tax Credit Projects for affordable housing development to expand multi-family rental development projects and homeownership opportunities when those projects are present for review. Additionally, acquisition, soft costs and site development funds will be used for affordable housing development. Consideration for additional funding will be given upon completion of the pre-development phase.

Through the Prince William County Comprehensive Plan 2040 there is now a new Housing Chapter which is addressing many of the housing needs in the County. There is also progress in determining an Affordable Housing Ordinance to be implemented potentially in the next fiscal year.

Actions planned to reduce lead-based paint hazards

Continue to meet HUD and EPA lead-based paint abatement standards in housing rehabilitation programs.

Seek funding as it becomes available to provide testing and abatement of lead-based paint hazards in single-family housing where young children are present.

Expand the stock of lead safe housing units through housing initiatives.

Seek funding as it becomes available to provide for testing, abatement, training, and educational awareness.

Actions planned to reduce the number of poverty-level families

The County will continue its efforts in conjunction with the Continuum of Care to reduce the number of poverty-level families through the development of services needed to assist those families with educational opportunities, job growth, and life skills training through the various social service agencies operating in the County and cities of Manassas and Manassas Park.

Actions planned to develop institutional structure

Work with non-profit organizations to address community needs and provide support to federal and non-federal funding initiatives. Work with private industry to address important issues that hamper housing and community development efforts. Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds.

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

The County will continue to coordinate planning activities with private housing and social service agencies, including participation in the Prince William County Continuum of Care meetings, participate and provide ongoing training and workshops, continued development of the Continuum of Care, and enumeration of point-in-time and homeless surveys. County staff will also continue its participation in other coalitions and study groups as the opportunity arises.

Discussion:

The County has not identified any major gaps in its institutional structure and coordination with outside agencies. The County will continue its efforts to coordinate with outside housing and social service agencies to meet the needs of County and City residents, as identified in the Federal Fiscal Year 2021-2024 Consolidated Plan.

37PROGRAM SPECIFIC REQUIREMENTS

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed \$260,037
2. The amount of proceeds from section 108 loan guarantees will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. 0
3. The amount of surplus funds from urban renewal settlements 0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan 0
5. The amount of income from float-funded activities 0

Total Program Income: 0

Other CDBG Requirements

1. The amount of urgent need activities 0
2. The estimated percentage of CDBG funds 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 80% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 99.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

The County will continue to support the many efforts of the non-profits and social service provider agencies in the community in their efforts to obtain funding from various sources for their programs.

Many of these organizations receive private donations to sustain their programs, and most apply for funding on the federal, state, and local level.

The availability of federal funds would enhance any of the listed programs and would mean that more services, and housing, could be provided. Because of the scarcity of any type of funding, the County has been working with various organizations to try to develop programs that would increase the leveraging capacity of federal funding mechanisms so that more money would be available for other needed endeavors. Better use of the existing resources is a main concern of everyone.

Anticipated HOME Program income for FY 2025 is \$200,000.

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 HOME Recapture Provisions are established §92.253(a)(5)(ii) and permits the original homebuyer to sell the property to any willing buyer during the period of affordability. The repayment conditions for the FTHB Program assistance outline the shared market appreciation also referred to as the share of net proceeds.

Recapture provisions are in effect for periods of thirty years from the date of each settlement. Recapture is enforced through deed restrictions to ensure that the entire amount of HOME assistance to homebuyers is recouped if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. Prince William County guidelines for the FTHB Program stipulate that the recapture provision **will be** implemented for use of HOME Funds.

2. 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:

Resale requirements must ensure that if the housing does not continue to be the principal residence of the family for the full period of affordability that the housing must be made available for subsequent purchase only to a buyer whose family qualifies as a low-income family and will use the property as their principal residence. The resale requirement must also ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement as defined below) and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. Resale requirements are maintained through deed

restrictive covenants or other HUD identified enforcement mechanisms. The period of affordability is based on the total amount of HOME funds initially invested in the housing. Prince William County guidelines for the FTHB Program stipulates that PWC **does not** implement the Resale provision for use of HOME funds.

3. 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:

The County does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds. In addition, the funds will not be used to refinance multifamily loans made or insured by any federal program. The County is aware that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

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

Included as an attachment.

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

Congress has directed HUD to improve the collection of data on the extent of homelessness locally and nationally. Communities must collect an array of data including an unduplicated count of homeless persons, analyze their patterns of the use of the McKinney-Vento and other assistance, including information on how they enter and exit the homelessness assistance system and assess the effectiveness of that assistance. Through the Federal Register Notice, the Emergency Solutions Grants Program and Community Development Block Grants were made a part of this mandate.

Therefore, all proposed projects/organizations must provide written certification of their participation in an existing HMIS.

Prince William Area Continuum of Care (CoC) has developed and approved the implementation of Homelessness Services Coordinated Entry System based on HUD requirements, for participation by all current Homeless Service agencies in an effort to establish a central standardized access and assessment for all individuals in need of housing assistance. This system will also assist in coordinated referrals and the housing placement process to ensure that all people experiencing homelessness receive appropriate assistance with both immediate and long- term housing and services, as their needs may be. Coordinated Entry is made available to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

The Prince William Area (CoC) Coordinated Entry (CE) System will utilize the CoC's Homeless Management Information System (HMIS) to collect, store, share and report participant data associated with the coordinated entry process with the goal of increasing efficiency and effectiveness of screening, assessment, prioritization, and referral for those homeless persons most in need of assistance.

3. Identify the process for making sub-awards and describe how the ESG allocation is available to private nonprofit organizations (including community and faith-based organizations).

Prince William County expects to receive \$228,267 for the Federal Fiscal Year 2023 - County Fiscal Year 2024 Emergency Solutions Grant (ESG) Program for Shelter Operations. The amount of assistance is calculated based upon the allocation and the bed night count. These funds will be awarded to community-based, nonprofit organizations providing emergency shelter and related services to the homeless, on a dollar- for-dollar match. Emergency Solutions Grant funds may be used for operations and maintenance, homeless prevention, essential support services and renovation/rehabilitation activities in connection with emergency shelters for the homeless. It is a priority of the U.S. Department of Housing and Urban Development (HUD) and Prince William County to work under a Continuum of Care approach to homelessness to assist homeless individuals and families to obtain a decent living environment, either through rental housing or home ownership. OHCD specifically seeks proposals to provide shelter and supportive services for the homeless.

The purpose of the Emergency Solutions Grant (ESG) Program is to: 1) Broaden existing emergency shelter and homelessness prevention activities; 2) Emphasize Rapid Re- Housing; and, 3) Help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness; 4) Enhance alignment of ESG regulations with other HUD programs including CDBG, HOME, and Housing Choice Voucher (HCV) program; and, 5) Support more coordinated and effective data collection, performance measurement, and program evaluation. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Prince William County Housing Board is responsible for overseeing the expenditure of funds for the Office of Housing & Community Development (OHCD) and directing management of programs administered by OHCD. The Housing Board is comprised of eight (8) members approved by the County Board of County Supervisors and six (6) other members' representatives of the following entities:

- * Commission on Aging
- * Committee for Persons with Disabilities
- * Community Services Board
- * Continuum of Care Network
- * Social Services Board
- * Resident of Housing Choice Voucher Program Representative

This Board recommends goals for OHCD depending upon local need and programs for housing opportunities for low-moderate income residents.

The County requires non-profits participating in the ESG program to have homeless representatives on their boards of directors.

4. Describe performance standards for evaluating ESG.

HUD has implemented a mandated system of reporting performance measurements in a precise and timely manner. All recipients funded under this proposal must provide needed data to Prince William County in order to be reimbursed for eligible expenses. All of the activities funded must identify one of the three performance measurements overarching objectives: 1) creating 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) providing decent affordable housing (This objective focuses on housing programs where the purpose is to meet individual family or community needs and not programs where housing is an element of a larger effort); 3) creating economic opportunities (This objective applies to the types of activities related to economic development, commercial revitalization, or job creation). There are also three outcomes under each objective: (1) Availability/Accessibility, (2) Affordability, and (3) Sustainability. Thus, the three objectives, each having three possible outcomes, will produce nine possible outcome/objective statements within which to categorize grant activities, as follows: Availability/Accessibility. This outcome category applies to activities that make services, infrastructure, 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 moderate-income people. 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 daycare. 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 benefits to persons or low-and moderate-income people or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

APPENDICES

OPEN COMMENT PERIOD & NOTICE OF AVAILABILITY OF DRAFT

PRINCE WILLIAM AREA

(Prince William County; Cities of Manassas and Manassas Park)

CONSOLIDATED HOUSING AND COMMUNITY DEVELOPMENT ANNUAL ACTION PLAN FEDERAL FISCAL YEAR 2024 (FY2025)

All citizens and interested parties of the Prince William Area are hereby notified that **effective February 29, 2024**, the draft plan is available for public review and comments. Copies of the plan are available for public viewing at regional libraries and County/City government centers. To request a copy of the draft Annual Action Plan for Federal Fiscal Year 2024 (FY25), call 703-792-7531 or visit our website at <https://www.pwcva.gov/departments/housing-community-development>.

Informational briefings of the plan will take place virtually and in person based on the following schedule(s):

Thursday, March 14, 2024, at 10:30 AM

<https://pwc-doit.webex.com/pwc-doit/j.php?MTID=m95e749d0291b3c2b86ec04c30c5bdebc>
Meeting number: 2309 372 2649
Password: HMr7vqn5Xm6

Call In:

+1-202-860-2110 United States Toll (Washington D.C.)
+1-415-655-0001 US Toll
Access code: 2309 372 2649

Wednesday, March 27, 2024, at 1:00 p.m.

<https://pwc-doit.webex.com/pwc-doit/j.php?MTID=m5f8aba7fc3e3f751abe8ae17121182a2>
Meeting number: 2319 753 4592
Password: xBtm6CqEe75

Call in:

+1-202-860-2110 United States Toll (Washington D.C.)
+1-415-655-0001 US Toll
Access code: 2319 753 4592

In Person – A.J. Ferlazzo Building, 15941 Donald Curtis Drive
Suite #112, Woodbridge, VA 22191 – Housing Conference Room

The draft plan documents housing and non-housing needs, outlines available resources and presents a one-year plan for using Federal Fiscal Year 2024 (FY25) funds. According to the National Affordable Housing Act of 1990, as amended, communities, which receive Federal housing funds, must submit this multi-year plan to the U.S. Department of Housing and Urban Development (HUD).

Citizens and other interested parties are urged to attend the informational meetings and/or submit written comments, by no later than **midnight, March 29, 2024**.

Non-English-speaking residents and citizens with speech, sight, or hearing impairments who wish to review the documents or comment at the public meetings should contact the Prince William County Office of Housing & Community Development five days in advance at 703-792-7531. Virginia Relay enables people who are deaf, hard of hearing, deaf/blind, or have difficulty speaking to communicate by TTY (text telephone) or another assistive telephone device with anyone who uses a standard phone. Anyone can make a Virginia Relay call by dialing 7-1-1. Each request will be considered individually according to the type of assistance required, the availability of resources, and the financial ability of the County to provide accommodation.

For more information concerning any of the above call Julie Roane at (703) 792-7531. Written comments should be directed to:

PWC Office of Housing and Community Development
Attn: Julie Roane Administrative Coordinator
15941 Donald Curtis Drive, Suite 112
Woodbridge, Virginia 22191-4291
jroane@pwcgov.org





April 1, 2024

Mr. Steve Amato
Occoquan District Resident

Re: *Comments and Responses to DRAFT FFY24(FY25) Annual Action Plan*

I, Steven Amato, an Occoquan District resident do submit written comments in accordance with the Prince William County (PWC) Draft Federal Fiscal Year (FFY) 2024 Action Plan, page 46, Appendices "Citizens and other interested parties are urged to attend the informational meetings and/or submit written comments, by no later than midnight, March 29, 2024."

The following written comments are for consideration for the PWC Office of Housing and Community Development to finalize the Federal Fiscal Year 2024 (FY25) Annual Action Plan.

1. On page 1, section AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b), change "ESG" to "Emergency Solutions Grant." Rationale, the term Emergency Solutions Grant needs to be written out first before using an acronym so as to not confuse ESG with Environmental, Social, and Governance.

Correction has been made within this section.

2. There is no section in the action plan summarizing the factors which influence affordable housing. The factors need to be described and incorporated into every annual action plan for all PWC citizens to understand. PWC cannot solve affordable housing to all or the county would not be able to fund for the safety of its citizens by funding law enforcement, emergency responders, public schools and the county government.

1. Rationale: There are many factors which impact a person being able to afford a home (own or rent). The following are factors which impact owning or renting housing: inflation, personal property tax, real estate tax, federal mortgage interest rate, salary, the job market, energy costs, housing (a home or rental property) supply, housing development capability, financial institutions, individual motivation to be employed, is a person taking the initiative to improve one's self for higher paying employment, and a person managing their income to live within their means.

The Annual Action Plan is a document mandated by the U.S. Department of Housing and Urban Development (HUD) that outlines local affordable housing and community development needs and identifies strategies for addressing them. Action plans are often used in strategic planning. The Annual Action Plan coincides with the Five-Year Consolidated Plan which provides a summary of the actions, activities, and the specific federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

3. Throughout the draft action plan change “Decent Housing” to “Suitable Housing.” Define Suitable Housing as a shelter with basic sustainability for a human, such as a bathroom, a room to sleep, and an area to prepare meals. Rationale: the term “Decent” is too broad.

The U.S. Department of Housing and Urban Development (HUD), as part of HUD's mission is to provide quality, affordable homes for all. HUD insures and funds projects to address decent, safe, sanitary, housing as a top priority for HUD, which is a broad definition established intentionally. HUD does not recognize the term “suitable housing” in the manner in which Mr. Amato has requested. Suitability is used by HUD to mean a property that HUD has determined to satisfy the criteria listed in 24 CFR 581.6 as suitable for use by the homeless.

4. On page 22, Goal 3, Expand Affordable Housing, how is this funded? PWC should not fund this with PWC tax payer funds.

The Annual Action Plan is a requirement to verify where Federal Funds provided to Prince William County will be obligated to specific projects. The Plan does not reflect any Prince William general funds obligated for projects contained within the Plan.

5. After Goal 7 on page 23, add Goal 8, Engagement with Federal Congressional representatives for Virginia.

1. Rationale: Various bills which Congress supports directly influence affordability of housing. For example, the various federal bills which pushed funding to the economy only drove inflation which resulted in 30 year higher mortgage interest rates. These policies made owning a home more difficult because mortgage rates were driven higher. Low-to moderate income families could afford housing with interest rates between 2% to 3.5%. Now they cannot because of the various Congressional bills. PWC needs to engage with the respective Congressional representatives (House and Senate) to explain the impact their policies are having on the availability of affordable housing in PWC.

As stated previously the Annual Action Plan is a requirement to verify where Federal Funds provided to Prince William County will be obligated to specific projects. The Office of Housing and Community Development (OHCD) as a government agency is prohibited from “Lobbying” using funds provided or personnel employed in the administration of the program for: political activities, sectarian or religious activities; lobbying, political patronage, and nepotism activities.

Prince William County has a designated Legislative Liaison who represents the County concerning various federal and state congressional bills.

6. Add Goal 9, Engagement with State of Virginia Legislative representatives.

1. Rational: PWC needs to engage with the respective Virginia House of Delegates and state senators so they are educated about how the Virginia personal property tax impacts a person unable to pay this tax and the real estate tax to afford housing. If the Virginia Legislatures keep creating additional taxes to fund numerous social service programs, these taxes impact the low to moderate income bracket Virginians so as they cannot afford housing.

See response to Question 5.

7. In section AP-38 Project Summary, pages 25 - 37, add the following information to each project: the funding source (federal, state, or non-profit), is the funding for program administration, a full time employee, or to build housing? Rationale: this information will help to clarify the proposed source of the funding stream and to clarify the application of the project funding.

The federal funding sources are described as well as the description of the project and if administrative staff is included within the funding.

8. At the end of section AP-38 Project Summary, add a table which describes the total funding for all projects rolled up. For example, the total funding planned for through ESG, CBDG, HOME, state, county, and non-government agencies.

The individual projects reflect the federal dollar amount obligated which equals the total of all federal obligated funds. In the Final Plan a spread sheet will be incorporated to indicate a total for each funding source by project.

9. On page 41, AP-75 Barriers to affordable housing – 91.220(j), under the introduction it states “No public policies were identified that have negative effects on affordable housing development.” Change to “there are various federal and state of Virginia policies which have negative effects on affordable housing development.”

Rationale: Federal bills (laws signed by the president) have flooded the economy with too much money, this significantly increased inflation which drove higher federal mortgage interest rates. People cannot afford the higher mortgage interest rates. The federal government has significantly driven energy costs which impact constructing and transporting materials for affordable housing. Increased energy costs drove higher electricity rates.

Rationale: The Virginia Legislatures policy to sustain the personal property tax is a policy which results in a person paying nearly a one month’s worth of rent for this tax. Various attempts have been introduced to the Virginia General Assembly to eliminate the personal property tax, but the attempts have failed. This is a policy impacting affordable housing.

Public policies as defined in this section is regarding Prince William County’s public policies such as the 5-Year Comprehensive Plan, Zoning Administration and the Strategic Plan which do not create barriers to affordable housing.

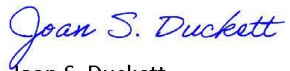
10. Add information into the annual action plan regarding the Veterans Affairs homeless veterans program. This is a source to use in the action plan to assist homeless veterans with costing PWC.

The federal funds identified within the Annual Action Plan reflect only the funding sources which are allocated for projects with the Prince William Area (County, cities of Manassas and Manassas Park) include the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) and Emergency Solutions Grant (ESG). While ESG funds are directed entirely to homeless initiatives, our office does not receive a direct allocation of funding from Veterans Affairs. This information will

be relayed to the Continuum of Care (CoC) which consists of both governmental and non-profit organizations that's mission is working with homeless.

Thank you

Sincerely,

A handwritten signature in blue ink that reads "Joan S. Duckett". The signature is written in a cursive, flowing style.

Joan S. Duckett
Director of Housing

EMERGENCY SOLUTIONS GRANT (ESG)

Catalog of Federal Domestic Assistance (CFDA) Number: 14.231) (Code of Federal Regulations (CFR) Citation Number: 24 CFR Part 576)

Background

The Emergency Shelter Grants Program was established by the Homeless Housing Act of 1986 in response to the growing issue of homelessness in the United States. In 1987, the program was incorporated into Title IV of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. Sec. 11371- 11378), now known as the McKinney-Vento Homeless Assistance Act. ESG funds are federal funds awarded to Prince William County by the U. S. Department of Housing and Urban Development (HUD).

On May 20, 2009, President Obama signed into law a bill to reauthorize HUD's McKinney-Vento Homeless Assistance programs. The bill was included as part of the Helping Families Save Their Homes Act and was enacted by Senate bill 896. The new Act, which amended the McKinney-Vento Homeless Assistance Act, is the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.

Subtitle B – Emergency Solutions Grant Program is the section of the HEARTH Act pertaining to the Emergency Solutions Grants Program and replaces what was formerly the Emergency Shelter Grants

Program. Because the program regulations were still being revised when the funding became available, HUD released the funding in a two (2)-stage allocation process. The first allocation was made immediately available to avoid a lapse in funding for existing Emergency Shelter Grant activities. These funds were subject to the Emergency Shelter Grant regulations in effect at that time.

The new ESG program provides funding for street outreach, homelessness prevention, rapid re-housing of homeless people, emergency shelter, supportive services to the homeless, and Homeless Management Information System (HMIS) activities. All Subrecipients that receive funding will be required to participate in HMIS.

The American Recovery and Reinvestment Act of 2009 created the innovative Homeless Prevention and Rapid Re-Housing Program (HPRP), which laid the groundwork for preventive and re-housing activities included in the new Emergency Solutions version of ESG. The Emergency Solutions program represents

HUD's now greater emphasis on preventing homelessness for those at risk and responding rapidly to re- house individuals and families that have become homeless.

HUD strongly encourages each jurisdiction to focus as much of its new ESG as possible on rapid re- housing individuals and families living on the streets or in emergency shelters. While both rapid re- housing and homelessness prevention are eligible activities, only rapid re-housing assistance targets those individuals and families living on the streets or in emergency shelters. Effective rapid re-housing helps people transition out of the homeless assistance system as quickly as possible, decreasing the number of persons who are homeless within the community. Rapid re-housing also ensures that emergency shelter resources are used to serve individuals and families with the most urgent housing needs. As public and nonprofit resources become increasingly strained, rapid re-housing should be given the highest priority under ESG to help ensure that existing resources – both within and outside of the homeless assistance system – are used as efficiently as possible to help those most in need.

To receive allocation of funds for the Federal Fiscal Year 2020 - 2024 Emergency Solutions Grants (ESG) program, the County is required to submit, and obtain HUD approval in accordance

with the County's Citizen Participation Plan and 24 CFR part 91, as amended by the Interim Rule. This will make the ESG program consistent with other HUD programs such as Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME) program, and the Housing Choice Voucher (HCV) program to increase efficiency and coordination among the different programs.

Eligible Applicant Organizations

Units of general local government to be considered as a unit of general local government, an organization must have, among other responsibilities, the authority to assess and collect local taxes and to provide general governmental services.

Private nonprofit organizations to be considered as a private nonprofit organization, an organization must document existing status as a 501(c)(3) tax-exempt entity. ESG funded private nonprofit organizations must be established for charitable purposes and whose activities include, but are not limited to, the promotion of social welfare and the prevention or elimination of homelessness as evidenced in its charter, articles of incorporation, resolutions or by-laws and experience in the provision of shelter and services to the homeless. The entity's net earnings may not benefit any individual(s) affiliated with the organization or their governing board and have standards of financial accountability that conform to the HUD Standards of Financial Management Systems.

FAITH-based organizations receiving ESG funds, like all organizations receiving HUD funds, must serve all eligible beneficiaries without regard to religion.

All must have approved established ESG Written Standards in accordance with Continuum of Care Coordinated Entry process and be an active member of the CoC and compliant with all HMIS reporting.

Program Purpose

The Emergency Solutions Grants Program is designed to be part of a continuum of assistance to enable homeless individuals and families to move toward independent living as well as to prevent homelessness. The objectives of the ESG Program shall be to:

- 1) Provide rental assistance for short-term and medium-term housing to homeless individuals or families or individuals at risk of homelessness.
- 2) Help support emergency shelters for the homeless, but only for use as temporary shelter for persons;
- 3) Help support the costs of operating and maintaining emergency shelters;
- 4) Provide essential services so that homeless individuals and individuals at risk of homelessness have access to the assistance they need to improve their situation and to obtain housing stability; and
- 5) Provide housing relocation and stabilization services homeless individuals and individuals at risk of homelessness.

Allocation of Funding

General Provisions: The Emergency Solutions Grants (ESG) program allows funding to be used in five program components:

- **Street Outreach:** Provision of essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying.
- **Emergency Shelter:** Provision of essential services to homeless families and individuals in emergency shelters and the operation of emergency shelters.
- **Rapid Re-Housing:** Provision of assistance to a homeless individual or family to move into permanent housing.
- **Homelessness Prevention:** Prevention of persons from becoming homeless and the assistance of participants in regaining stability in their current or other permanent housing.
- **Homeless Management Information Systems (HMIS):** Operation, maintenance, and contribution of data to the HMIS designated by the local Continuum of Care or, if a victim service provider to establish and operate a comparable database.

Expenditure Limits for Street Outreach and Emergency Shelter Activities:

Under the Interim Rule, the total amount of the County's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- 1) 60% of the County's fiscal year grant; or
- 2) The amount of the Federal Fiscal Year 2010-grant funds committed by contract between the date HUD signed the Federal Fiscal Year 2010 grant and January 4, 2012, the effective date of the Interim Rule. All Agreements were signed during this period.

HUD strongly encouraged each jurisdiction to focus as much of its new ESG funding as possible on rapidly re-housing individuals and families living on the streets or in emergency shelters. While both rapid re- housing and homelessness prevention are eligible activities, only rapid re-housing assistance targets those individuals and families living on the streets or in shelters. Effective rapid re-housing programs help people transition out of the homeless assistance system as quickly as possible, decreasing the number of persons who are homeless within the community.

Spending Requirements & Funding Decisions: The funding provided in the allocation is subject to all ESG requirements under the Interim Rule. These funds must be expended within 24 months after the date HUD approves the FFY23 (FY2024) Annual Action Plan and signs the grant agreement. The Interim Rule shifts the focus from emergency shelter to assisting people to quickly regain stability in permanent housing, which is reflected in expenditure limits on street outreach and emergency shelter activities. Compliance with these expenditure limits is measured using the amount of the Federal grant. HUD encourages communities to focus as much of their funding as possible on rapidly re-housing people who are literally homeless in order to reduce the numbers of people living in shelters and on the streets, in an effort to end homelessness.

Administrative Limits: The Interim Rule increases the expenditure limit for administrative activities from 5% to 7.5%.

Employee compensation and other overhead cost directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing and HMIS activities are eligible cost of those activities and not subject to the spending limits for administrative costs.

Definitions

Recipient Any state, territory, metropolitan city, or urban county or in the case of reallocation, any unit of general-purpose local government, approved by HUD to assume financial responsibility and which enters into a grant agreement with HUD to administer Emergency

Solutions Grant (ESG). Private nonprofit organizations are excluded from the definition because they are not direct recipients under the program.

Subrecipient's: Any unit of general local government, private nonprofit organization, or faith-based organization to which recipient awards ESG grant funds.

Continuum of Care A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelters; rapid re-housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Homeless: The HEARTH Act updated the McKinney Vento definition of homelessness. The new definitions went into effect January 4, 2012. A Homeless individual is defined under four (4) categories for ESG program:

HUD defines
"homeless" as:

Homeless means:

Category 1 Literally Homeless:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

Category 2 Imminent Risk of Homelessness:

- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith based or other social networks, needed to obtain other permanent housing;

Category 3 Homeless under other Federal

Statutes:

- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C.

5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42

U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers: i.e. chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4 Fleeing/Attempting to Flee Domestic

Violence (4) Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

At Risk of Homeless For an individual or family to qualify as "at risk of homelessness" the individual or family must meet two threshold requirements and must exhibit one or more specific risk factors.

At risk of homelessness means:

(1) **An individual or family who:**

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the 'homeless' definition in this section; and (iii) **Meets one of the following conditions:**
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics assorted with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
- (2) **A child or youth** who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- (3) **An unaccompanied youth** who does not qualify as "homeless" under this section but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Chronically homeless means:

- (1) An individual who:
- (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, where each homeless occasion was at least 15 days; and
 - (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), posttraumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) before entering that facility; or
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1), including a family whose composition has fluctuated while the head of household has been homeless.

Emergency Shelter The definition of emergency shelter has been revised to distinguish this type of shelter from transitional housing. An emergency shelter provides temporary shelter for the homeless, which do not require occupants to sign leases or occupancy agreements. This distinction was necessitated by the McKinney-Vento Act's explicit distinction between what activities can or cannot be funded under the Continuum of Care program and the Rule Housing Stability program. In the final rule, HUD clarified that "Shelter" means "Emergency Shelter" but not "Transitional Housing" for qualifying as homeless under this provision. However, under the definition, any project that received funding in FY2010 as an emergency shelter may continue to be funded under the ESG program, regardless of whether the project meets the revised definition.

Coordinated Entry System ***Coordinated entry*** is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

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

Rapid Re-Housing Assistance The provision of housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Youth is defined as less than 25 years of age. By establishing youth as less than 25 years of age, it is HUD's hope that the programs authorized by the HEARTH Act amendments to the McKinney Vento Act (42 U.S.C. 11301 *et seq*) will be able to address the unique needs of transition-aged youth adequately and appropriately, to include youth exiting foster care systems to become stable in permanent housing.

Long-Term Period The term long-term period is defined in the HEARTH Act to mean 60 days with two moves during that period.

Eligible Program Participants

There are two eligible target populations identified for ESG funds: persons who are still housed but at risk of homelessness and persons who are already homeless. Subrecipients are responsible for verifying and documenting the individuals' risk of homelessness and qualifies them for receiving assistance. HUD requires that Subrecipient's evaluate and certify the eligibility of program participants at least once every three (3) months for all persons receiving medium-term rental assistance. If a household or individual needs more intensive services or long-term assistance, or is not at risk of homelessness, Subrecipient's should link them to other appropriate available resources. To receive financial assistance or services funded by ESG, individuals and families, whether homeless or housed, must at least meet the following minimum criteria:

1. Have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs.
2. The household must be at or below **30 percent** of the Area Median Income (AMI). Income limits are available on HUD's website found at <https://www.huduser.gov/portal/datasets/il.html> Subrecipients should use HUD's Section 8 income eligibility standards to determine income eligibility for ESG funded assistance.
3. The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: 1) no appropriate subsequent housing options have been identified; and 2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in existing housing. Applicants must meet the "but for" test, that is, **but for** prevention assistance, the household would continue to remain homeless because they lack the financial resources or support networks to obtain housing and they have not subsequent housing options.

Other Selection Criteria would include:

1. Employment History – current and past
2. Transportation – ability to get to work/daycare
3. Household Budget – debt ratios
4. Lease – have lease in applicants name or ability to obtain lease in applicants' name

Homelessness Prevention Assistance is to be targeted to individuals and families at the greatest risk of becoming homeless. One question to ask is “Would this individual or family be homeless if they were not assisted with ESG funds?” The assistance must be necessary to avoid eviction or termination of utility services. Consideration should also be given to whether the individual or household will be able to resume payments after the ESG program cannot assist them. Case management services should be provided to assist the individual and family to work toward self-sufficiency.

Rapid Re-Housing Assistance is available for persons who meet HUD’s definition. Individuals and families who meet one of the following criteria, along with the minimum requirements, are eligible under the rapid re-housing portion. The criteria are:

- Sleeping in an emergency shelter;
- Sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, streets/sidewalks;
- Staying in a hospital or other institution for up to 180 days but was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, Etc.) immediately prior to entry into the hospital or institution; • Graduating from, or timing out of, a transitional housing program; and • Victims of domestic violence.

Eligible Activities

Street Outreach Component

ESG grant amounts may be used for one or more of the following activities:

1. **Street Outreach:** Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach are also eligible.

Eligible Program Participants: Unsheltered individuals and families who qualify as homeless under Category 1 of HUD’s Definition of “Homeless”.

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non- facility-based care to unsheltered homeless people who are unable to access emergency shelter, housing, or an appropriate health facility.

The eligible cost and requirements for essential services consist of:

- 1) **Engagement** The cost of activities to locate, identify and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs (meals, blankets, clothes, toiletries) and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs (emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

- 2) **Case Management** The cost of assessing housing and service needs arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participants.
- 3) **Emergency Health Services** Eligible cost are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings to include streets, parks, and other places where unsheltered homeless are living.
- 4) **Emergency Mental Health Services** Cost for direct outpatient treatment by licensed professionals of mental health conditions, operating in community-based settings to include streets, parks, and other places where unsheltered homeless are living.
- 5) **Transportation** Cost of travel by outreach workers, social workers, medical professionals, or other service providers are eligible provided that the travel takes place during the provision of serviced eligible under this section. The cost of transporting unsheltered people to emergency shelters or other service facilities is also eligible.
- 6) **Services for Special Population** ESG funds may be used to provide services for homeless youth, victim services and services for people living with HIV/AIDS so long as the cost of providing these services are eligible under number 1-5.

Emergency Shelter Component

Eligible Participants:

Individuals and families who qualify as homeless under Categories 1,2,3 and 4 of HUD'S Definition of "Homeless"

ESG Funds may be used to cover the costs of providing essential services to homeless families and individuals in emergency shelters and operational expenses of emergency shelters.

2. Allowable Activities:

- a. *Essential Services.* This includes services concerned with employment, health, drug abuse, education, and staff salaries necessary to provide these services and may include, but are not limited to:

(i) Case Management. The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.

Component services and activities consist of:

- (A) Using the centralized or coordinated assessment system as required under §576.400(d);
- (B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility; (C) Counseling;
- (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits; (E) Monitoring and evaluating program participant progress;
- (F) Providing information and referrals to other providers;
- (G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(ii) Child Care. The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13 unless they are disabled. Children with disabilities must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates for its costs to be eligible.

(iii) Education Services.

When it is necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language and GED.

(iv) Employment Assistance and Job Training.

The cost of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on the job instruction and services that assist individuals in securing employment, acquiring learning skills. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also eligible.

(v) Outpatient Health Services. Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services; including providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

(vi) Legal Services.

Eligible costs are the hourly fees for legal advice and representation by Attorneys, licensed and in good standing with the bar association in Virginia, regarding matters that interfere with the program participant's ability to obtain and retain housing. Emergency Solutions Grant funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible subject matters are child support, guardianship, paternity, emancipation and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault and stalking, appeal of veterans and public benefit claim denials and the resolution of outstanding criminal warrants. Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings and counseling.

Fees based on the actual service performed are also eligible, but only if the cost would be less than the cost of hourly fees.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible cost as well as retainer fee arrangements and contingency fee arrangements.

(vii) Life Skills Training The cost of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse use and homelessness are eligible costs. These costs for services must be necessary to assist the program participant to function independently in the community.

(viii) Mental Health Services Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions where other appropriate mental health services are unavailable or inaccessible within the community. Eligible treatment consists of crisis intervention, individual, family or group therapy sessions, the prescriptions of psychotropic medications or explanations about the use and management of medications and combinations of therapeutic approaches to address multiple problems.

(ix) Substance Abuse Treatment Services Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. ESG Funds may only be used to the extent that other appropriate substance abuse treatment services are unavailable in the community. Treatment consists of client intake, assessment, and outpatient treatment for up to 30 days. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

(x) Transportation Eligible cost consists of transportation cost of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.

These costs include the following:

- a) Cost of program participant's travel on public transportation
- b) If service worker uses their own vehicle, mileage allowances for service worker to visit program participants;
- c) Cost of purchasing or leasing a vehicle for the County or Subrecipient to which staff transports program participants and/or staff serving program participants and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
- d) Travel cost of County or Subrecipient staff to accompany or assist program participants to use public transportation.

(xi) Services for Special Populations ESG funds may be used to provide services for homeless youth, victim services and services for people living with HIV/AIDS so long as the cost of providing these services are eligible under categories listed above.

Operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

(xii) Renovation, Rehabilitation or Conversion of Building for Shelters Eligible cost includes labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a governmental entity or private nonprofit organization.

Examples of allowable rehabilitation projects include, but are not limited to, accumulated deferred maintenance (i.e., replacing flooring), replacement of principle fixtures and components, improvements to increase energy efficiency (i.e., replacing a furnace or air conditioning unit), and structural changes necessary to make the facility accessible for persons with physical disabilities. Rehabilitation projects include deferred repairs for items that are inoperable or broken and in need of replacement prior to the request of the ESG funds. Rehabilitation does not include non-deferred repairs.

Types of rehabilitation projects include:

- a) **Conversion:** a change in the use of a building to an emergency shelter or transitional housing where rehabilitation costs exceed 75% of the value of the building **after** conversion. If selected for funding, the facility would be required to be used as a shelter for the homeless for at least **10 years**.
- b) **Major rehabilitation:** rehabilitation or conversion involving costs in excess of 75% of the value of the building **prior to** the proposed rehabilitation or conversion. If selected for funding, the facility would be required to be used as a shelter for the homeless for at least **10 years**.
- c) **Renovation:** rehabilitation that involves costs of 75% or less of the value of the building **prior to** the proposed rehabilitation. If selected for funding, the facility would be required to be used as a shelter for the homeless for at least **3 years** to 10 years depending upon the type of renovation and the value of the building after completion of renovations.

Operations & Maintenance of Shelter

ESG funds may be used for maintenance, operation, insurance, provision of utilities, and furnishings related to emergency shelter.

Maintenance costs include contract services for copier or security system maintenance, pest control, lawn care, contracted janitorial service, etc.

Operation costs include facility rent, utilities, internet service, and telephone; building maintenance and non-deferred repairs; food for shelter residents; vehicle maintenance, registration, repairs, and fuel; building or equipment insurance; fidelity bond coverage; office and maintenance supplies; contracted security services, staff mileage reimbursement (for travel relating to ESG service delivery), and pre-award travel expenses.

ESG funds may not be used for recruitment or on-going training of staff, mortgage payments for the organization, or depreciation. If a building is owned by the ESG Subrecipient or a subsidiary, rent may not be charged to ESG. Only the allocable share of maintenance, utilities, and insurance may be charged.

Non-deferred repairs are items that break during the contract period, such as:

- a) repairing a window that is broken;
- b) repairs due to water damage; or
- c) repairing a broken furnace or air conditioning unit.

Furnishings may include beds, mattresses, linens, desks, tables, chairs, etc.

Homelessness Prevention Component

ESG funds may be used to provide housing relocation and stabilization services and short and/or medium- term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place. This assistance, referred to as homelessness prevention,

may be provided to individuals or families who meet the criteria under the “at risk of homelessness” definition or homeless definition and have an annual income below 30% of median family income for area as determined by HUD.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into another permanent housing and achieve stability in the housing.

Rapid Re-Housing Assistance Component

ESG funds may be used to provide housing relocation and stabilization services and short and/or medium- term rental assistance necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This housing, referred to as rapid re-housing assistance, may be provided to program participants who live in an emergency shelter or other place described in the homeless definition. The rapid re-housing assistance must be provided in accordance with housing relocation and stabilization services requirements, as well as the short- and medium-term rental assistance requirements.

Housing Relocation and Stabilization Services

Financial Assistance Costs

ESG funds may be used to pay housing owners, utility companies and other third parties for the following costs:

Rental Application Fees ESG funds may pay for the rental housing application fee that is charged by the owner to the applicant.

Security Deposits ESG funds may pay for a security deposit that is equal to no more than two months’ rent.

Last Month’s Rent, If necessary, to obtain housing for a program participant, the last month’s rent may be paid from ESG funds to the owner of the housing at the time the owner is paid the security deposit and the first month’s rent. This assistance must not exceed one month’s rent and must be included in calculating the program participant’s total rental assistance, which cannot exceed 24 months during any 3-year period.

Security Deposits ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities.

Utility Payments ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. Assistance may only be provided if the program participant or a member of the same household has an account in his or her name with the utility company or proof of responsibility for making utility payments.

Moving Cost ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Service Cost

This category includes the provision of housing relocation or stabilization services for homeless individuals or families or individuals or families at risk of homelessness, including housing search, mediation or outreach to property owners, legal services, credit repair, providing security or utility deposits, utility payments, rental assistance for a final month at a location, assistance with moving costs, or other activities that are effective at **(a)** Stabilizing individuals and families in their current housing; or **(b)** Quickly moving such individuals and families to other permanent housing

Housing search and placement funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services may include tenant counseling, assisting participants to understand leases, securing utilities, making moving arrangements, representative payee services concerning rent and utilities, and mediation and outreach to property owners related to locating or retaining housing.

Regarding legal services to help pay people stay in their homes, such services must be provided by a lawyer or other person(s) under the supervision of a lawyer to assist program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues. Legal services related to mortgages are not allowable.

Credit repair includes costs associated with assisting program participants with critical skills related to household budgeting, money management, accessing a free personal credit report, and resolving personal credit issues.

Short Term & Medium-Term Rental Assistance

This category includes a provision of rental assistance to provide short-term or medium-term housing to homeless individuals or families or individuals or families at risk of homelessness. Such rental assistance may include tenant-based or project-based rental assistance.

In order to assist with rental assistance program, the participant must have a written lease with the property owner and the Subrecipient and property owner must have a rental assistance agreement.

Short-term rental assistance may not exceed rental costs accrued over a period of three (3) months.

Medium term rental assistance may not exceed actual rental costs accrued over a period of 4 to 24 months. No participant may receive more than 24 months of assistance.

After three (3) months of assistance, a participant must be re-evaluated for eligibility to receive additional months of medium-term rental assistance, for a total of 24 months. HUD encourages Subrecipient's to provide ongoing case management to all program participants in order to transition them to independence, including permanent housing arrangements.

Arrears Rental assistance may be used to pay up to six (6) months of rental arrears for eligible participants including any late fees on those arrears. Such may be paid if the rental payment enables the participant to remain in the housing unit for which the arrears are being paid or to move to another unit. If funds are used to pay arrears, the arrears are included in determining the maximum 24 months of assistance.

Rent Restrictions Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD. <http://www.huduser.org/portal/datasets/fmr.html>

For purposes of calculating rent, the rent shall equal the sum of the total monthly rent for the unit. If the tenant pays separately for utilities, the monthly allowance for utilities (excluding phone) is established by

OHCD Housing Choice Voucher Program and is added to the requested rent to determine if the rent is within the Fair Market Rent. Rental assistance must be in compliance with HUD's standard of "rent reasonableness". Information can be located at:

www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc

Rental Assistance Agreement the Subrecipient can only make payments to owners if they have entered into a Rental Assistance Agreement. The Agreement must:

- Set forth the terms under which rental assistance will be provided;
 - Provide that during the term of the Agreement the owner must give the Subrecipient a copy of any notice to program participant to vacate the housing unit or any compliant used under state law to commence an eviction action.
 - Subrecipient must make timely payments to the owner and the Agreement must contain the same payment due date, grace period and late payment penalty requirements as the program participant's lease. The Subrecipient is solely responsible for paying late payment penalties that incurs with non-ESG funds.
- Agreement may be terminated under the following conditions:
 - Program participant moves out of the housing unit for which the program participant has a lease;
 - The lease terminates and is not renewed; or
 - The program participant becomes ineligible to receive ESG rental assistance.

Homelessness Management Information System (HMIS) Component

Eligible costs related to data collection and reporting for ESG conducted through the Homeless Management Information Systems (HMIS) are an eligible expense under the ESG program. Reasonable and appropriate costs associated with operating an HMIS for purposes of collecting and reporting data required under ESG and analyzing patterns of use of ESG funds are eligible. Eligible costs include purchase of HMIS software and/or user licenses, leasing or purchasing needed computer equipment for providers and the central server, costs associated with data collection, entry and analysis, and staffing associated with the operation of the HMIS, including training.

HMIS activities that are ineligible include planning and development of HMIS systems, development of new software systems, and replacing local government funding for existing HMIS. Only those Subrecipient's that do not have an HMIS already implemented may use a portion of these funds for HMIS implementation or start-up activities.

Acceptable Documentation & Recordkeeping Requirements:

Third party documentation, where it is available, is the preferable documentation of homeless status. The exception to this is for recipients that provide emergency assistance, including emergency shelters that provide a bed for one night, and victim service providers.

Utilizing other forms of already available documentation is acceptable evidence of an individual or family's homeless status. Already available documentation includes certification or other appropriate service transactions recorded in a Homeless Management Information System (HMIS) or another database. This also includes discharge paperwork, to verify a stay in an institution.

Literally Homeless

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that he/she/they were living on the streets or in shelter;
- For individuals exiting an institution-one of the forms of evidence above and:
 - Discharge paperwork or written/oral referral, or
 - Written record of intake worker's due diligence to obtain above evidence and

certification by individual that they exited institution

Would include oral statement made by a social worker, case manager, or other appropriate official at an institution documented by the intake worker of housing or service program. Where the intake worker is not able to obtain a written or oral statement from a social worker, case manager or other appropriate official at an institution, the intake worker may document his or her due diligence in attempting to obtain a statement from the appropriate official in the case file.

Imminent Loss of Housing

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual or families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
- Certification that no subsequent residence has been identified and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing

Homeless status of an unaccompanied youth or family with children and youth who qualify for homeless under "other federal statutes."

- Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no PH in last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or two or more barriers

Homeless status by providers serving individuals and families fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, and stalking that are not victim service providers

- The rules impose additional verification requirements for oral statements by individuals or families who are fleeing, or attempting to flee, domestic violence,

dating violence, sexual assault, and stalking who are seeking or receiving shelter or services from providers who are not victim service providers.

For victim service providers:

- An oral statement by the individual or head of household seeking assistance which states
 - They are fleeing; they have no subsequent residence; and they lack resources
 - Statement must be documented by a self-certification or a certification by the intake worker

For non-victim service providers:

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-Certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing

Disability Status 1) written verification from a professional who is licensed by the state to diagnose and treat that condition, that the disability is expected to be long-continuing or of indefinite duration and that the disability substantially impedes the individual's ability to live independently; and 2) written verification from the Social Security Administration, or the receipt of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation). Where disability is an eligibility requirement, the intake staff recorded observation of disability status as long as the disability is confirmed by the aforementioned evidence within 45 days of the application for assistance.

Other Program Requirements

Confidentiality to ensure the safety and security of ESG project participants fleeing domestic violence situations, ESG recipients are required to develop and implement procedures to guarantee the confidentiality of records concerning project participants. In addition, the address and location of family violence shelter facilities receiving ESG funding may not be publicly disclosed except with the written authorization of the person(s) responsible for the shelter facility's operation. To comply with this requirement, recipient organizations should, for example, keep written records or files pertaining to families under lock and key with only particular personnel granted access to those files.

Termination and Appeals Process the Subrecipient may terminate assistance to a program participant who violates program requirements. Subrecipients may resume payments to a program participant who was previously terminated. Subrecipients must develop a formal process that recognizes the rights of individuals receiving assistance to due process of law. In terminating assistance to a program participant, the Subrecipient must at a minimum consist of: (1) written notice to the program participant containing a clear statement of the reasons for termination; (2) a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (3) prompt written notice of the final decision of the program participant.

Program Accessibility The recipient (County) and Subrecipient must operate each existing program or activity receiving federal financial assistance so that the program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. Reasonable accommodations must be provided for persons with disabilities in order to enable program participants with disabilities to have equal opportunity to participate in program or activity. If an activity involves alterations to shelters, they may be subject to additional accessibility requirements in accordance with 24 CFR part 8.

Compliance with Fair Housing and Civil Rights Laws Subrecipient's must comply with all applicable fair housing and civil rights requirements in 24 CFR Part 5.105(a).

Conflict of Interest With respect to procurement activities, the Subrecipient must maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. At a minimum, these standards must:

- Require that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict would be involved. Such a conflict would arise when any of the following parties has a financial or other interest in the firm selected for an award:
 - an employee, officer, or agent of the Subrecipient;
 - any member of an employee's, officer's, or agent's immediate family;
 - an employee's, agent's, or officer's partner; or
 - an organization which employs or is about to employ any of the in the preceding section
- Require that employees, agents, and officers of the Subrecipient neither solicit nor accept gratuities, favors, or anything of value from contractors, or parties to sub agreements. However, Subrecipient's may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value.
- Provide for disciplinary actions to be applied for any violations of such standards by employees, agents, or officers of the Subrecipient.

With respect to all other assisted activities, the general standard is that no employee, agent, or officer of the Subrecipient, who exercises decision-making responsibility with respect to funds and activities, is allowed to obtain a financial interest in or benefit from activities, or have a financial interest in any contract, subcontract, or agreement regarding those activities or in the proceeds of the activities. Specific provisions include that:

- This requirement applies to any person who is an employee, agent, consultant, officer, or elected or appointed official of the County, a designated public agency, or a Subrecipient, and to their immediate family members, and business partner(s).
- The requirement applies for such people during their tenure and for a period of 1 year after leaving the County or Subrecipient organization.
- Upon written request, exceptions may be granted by HUD on a case-by-case basis, after consideration of the cumulative effect of various factors and only with: (a) full disclosure of the potential conflict, and (b) a legal opinion of the County attorney that there would be no violation of state or local laws in granting the exception.

Reallocation of Funds if the amount of unused or returned funds is not sufficient to justify the administrative burden of reallocating those funds; the funds may be added to the next fiscal year's allocation.

Systems Coordination Emergency Solutions Grants recipients (County) must consult with Continuums of

Care in allocating funds for eligible activities; developing performance standards, evaluating outcomes of ESG assisted projects and developing funding policies and procedures for the administration and operation of the HMIS.

Centralized or Coordinated Assessment Emergency Solutions Grants recipients (County) and Subrecipient's are to use a centralized or coordinated system to initially assess the eligibility and needs of each individual and family who seeks homeless assistance or homelessness prevention assistance. This centralized or coordinated assessment system has been developed and implemented by the Continuum of Care in accordance with minimum requirements to be established by HUD.

Shelter and Housing Habitability Standards The revised habitability standards incorporate lead-based paint remediation and disclosure requirements. All shelters must meet the minimum habitability standards adopted from the SHP regulations. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation standards including emergency efficient appliances and materials. If ESG funds are used to help program participants remain in or move into permanent housing, that housing must meet habitability standards. See ESG Housing Habitability Standards Inspection Checklist.

Subrecipient's who provide rental assistance with ESG funds will be required to conduct initial and any appropriate follow-up inspections of housing units into which a program participant will be moving. Units should be inspected on an annual basis and upon a change of tenancy. The minimum ESG Housing Habitability Standards Inspection Checklist must be completed.

Coordination with Continuum of Care (CoC) Planning Efforts Subrecipient's must coordinate with the local CoC to ensure that ESG activities are aligned with the CoC's strategies for preventing homelessness and ending homelessness. The impact of people receiving ESG assistance will ultimately be reported by CoC's through required point-in-time counts and through other data collected by HUD.

Consultation with Homeless Participates the Continuum of Care must provide for participation of not less than one (1) homeless individual or former homeless individual on the board of directors or other equivalent policymaking entity, to the extent that such entity considers and makes policies and decisions regarding any facility services, or other assistance of the recipient assisted under this part. The Secretary may grant waivers if the Continuum of Care is unable to meet the requirement under the preceding sentence if they agree to otherwise consult with homeless or formerly homeless individuals in considering and making such policies and decisions. Participation of homeless or formerly homeless persons in a policymaking or operations function can pose a challenge for ESG-funded program administrators.

Ineligible Activities

Rehabilitation activities funded through ESG cannot increase the square footage of the structure involved and must occur within the existing structure. (Refer to Section 504 of the Rehabilitation Act of 1973, as amended, as provided in 24 CFR 8.23 (1) or (b).)

ESG funds shall not be utilized acquisition of real property; new construction; addition of square footage, property clearance or demolition; support inherently religious activities such as worship, religious instruction, or proselytization; or to rehabilitate or repair buildings such as sanctuaries, chapels, and other rooms that a congregation uses as its principal place of worship.

ESG funds shall not be used for recruitment or on-going training of staff, depreciation, advertisement, entertainment, conferences, or retreat, public relations, advertising, bad debts/late fees, or mortgage payments of the Subrecipient organization.

Match Requirement

ESG Subrecipient's must match their award amount with **an equal amount** or greater amount of resources other than ESG funds. Therefore, ESG applicant organizations must demonstrate access to resources that may be used as a match **after** the date of the grant award. Matching funds used for this ESG project may not be used to match any other project or grant. Supportive Housing Program and Community Development Block Grants from the U.S. Housing and Urban Development Department may be used as match sources. Match resources must be documented and may include:

- 1) Donated Supplies:** Donated goods such as clothing, furniture, equipment, etc. Include the source and an estimated value for all donated goods.
- 2) Cash Donations or Grants:** Private donations or grants from foundations, nonprofits, or local, state, and federal sources. A single grant may serve as the required match.
- 3) Value of Donated Building:** The fair market value of a donated building in the year that it is donated. The building must be proposed for ESG-related activities and must not currently be in use for these activities. The verification should state when the building was donated and for what purpose, the current use of the building, and how long the building has been used for its current purpose. A licensed real estate salesperson, broker or licensed appraiser may be used to determine the fair market value of the property.
- 4) Rent or Lease:** Rent paid for space currently used to provide services to the homeless must *include the source of funds used to pay rent*. The fair market rent, or lease value of a building owned by or space that is donated (rent-free) to the organization is also an acceptable match resource. To document fair market value a letter from a licensed real estate salesperson, broker or licensed appraiser that specifies the location of building, square footage, value per square foot, and total lease or rent value based on 12-month occupancy.
- 5) Salaries:** Any staff salary paid with general operating funds or grant funds (CDBG, United Way, etc.). The position(s) used as match must be involved in ESG related activities and the

hours utilized for match must be for hours worked for ESG related activities. For each position, include the title, annual salary, percentage of time dedicated to ESG activities, source of funds and the dollar amount proposed as match.

6) Volunteers: Time and services contributed by volunteers, with a value not to exceed \$5 per hour. [Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community.]

Environmental Review

ESG projects are subject to meeting the environmental review requirements as set for under HUD 24 CFR Part 58.

Financial Management & Documentation

1. Financial Management

The financial management system used by the applicant is to provide for an annual audit, if required, in accordance with 2 CFR 200 Sub-part F 200.507 for Local Governments and private, nonprofit organizations are subject to the audit requirements, as applicable, which states that,

“Subrecipient’s that expend \$750,000 or more in a year of Federal funds shall have a single or program specific audit for that year. Entities that expend less than \$750,000 are exempt from federal requirements for that year, but all [financial and program] records are to be available for the grant period under audit for review by appropriate officials of the federal agency and the pass-thru entity [OHCD] 2 CFR 200.503.”

The Subrecipient agrees to ensure the grant is administered in accordance with the requirements of this part and the guidelines and requirements for Local Governments outlined in 2 CFR 200.327-329 Financial

Monitoring and reporting as they relate to the acceptance and use of ESG funds, and all other applicable federal and state requirements in effect for the period for which it receives grant funding;

The Subrecipient agrees to comply with 2 CFR 200 Subpart D §302 - §303 and agrees to adhere to the accounting principles and procedures required therein, utilize adequate internal controls, and maintain necessary source documentation for all cost incurred.

2. Cost Principles

The non-profit Subrecipient shall administer its program in conformance with 2 CFR, Part 200 subpart E, as applicable and agrees to adhere to the accounting principles and procedures required therein, utilize adequate internal controls, and maintain necessary source documentation for all costs incurred. These principles shall be applied for all costs incurred whether charged on a direct or indirect basis.

If the Subrecipient is a governmental or quasi-governmental agency, the applicable sections of 2 CFR 200 via 2CFR 2400.101, "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments," and OMB Circular A-87 which has been relocated to 2 CFR, Part 225 would apply.

An organization must include its most recent complete audit report and if applicable, management letters as part of the financial documentation before contracts are executed. If an organization is not required to have a single audit performed, end-of-the-year financial statements (balance sheet, income statement, and statement of cash flow) are required.

Contracts and Reporting

Projections of outputs and outcomes will be incorporated into contracts as performance measures. Applicant organizations must have a computer and access to the Internet. ESG monthly reporting will be electronic via the Internet. Organizations must have a computer on-site with the capability to transmit monthly financial and programmatic reports and receive electronic transmissions. Specific information on the format and due dates of required reports will be provided within contracts to Subrecipient's. Subrecipients must submit reports monthly, by the due date specified in the contract.

Subrecipient's are also required to report client-level data in a Homeless Management Information Systems (HMIS) and must have an agreement with the local HMIS Administrator for reporting. Domestic Violence providers must report in a comparable database. The Office of Housing and Community Development (OHCD) reserves the right to enter into direct agreement with the HMIS Administrators to provide OHCD with required data. OHCD may terminate the contract with a Subrecipient if any Subrecipient, including partners in a collaborative effort, is not complying with the requirements of the contract and HUD requirements related to ESG.

ESG Housing Habitability Standards Inspection Checklist

The standards for housing unit inspections under Emergency Solutions Grant (ESG) are the housing habitability standards. These standards apply only when a program participant is receiving financial assistance and moving into a new (different) unit. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of the ESG assistance.

The habitability standards are from the Housing Quality Standards (HQS) used for other HUD programs. HQS inspections standards do not require a certified inspector complete the inspection. As such, ESG program staff can conduct the inspections, using a form such as this one to document compliance.

Element

1. **Structure and materials:** The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and to protect the residents from hazards.
2. **Access:** The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.

3. **Space and security:** Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
4. **Interior air quality:** Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
5. **Water Supply:** The water supply must be free from contamination.
6. **Sanitary Facilities:** Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
7. **Thermal environment:** The housing must have adequate heating and/or cooling facilities in proper operating condition.
8. **Illumination and electricity:** The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
9. **Food preparation and refuse disposal:** All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
10. **Sanitary condition:** The housing and any equipment must be maintained in sanitary condition.
11. **Fire safety:** Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing- impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address and find the following:

☐ Property meets all of the above standards and is approved.

☐ Property does not meet all of the above standards and is no approved.

Case Name: _____

