Executive Summary

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

1. Introduction

In accordance with federal requirements for jurisdictions receiving funds from the United States Department of Housing and Urban Development (HUD) for housing and community development programs, Howard County has prepared its FFY2021 Annual Action Plan in accordance with its five -year Consolidated Plan for FFY2020-2024. This Action Plan outlines how the County will use federal resources to address the current housing and community development needs of our low to moderate income population, while remaining aligned with the goals outlined in our Consolidated Plan.

The most common housing problem in Howard County is housing affordable. According to the 2011-2015 American Community Survey, 44.8% all renter households were cost overburdened by 30% or more, 23.9% of owner households with a mortgage were cost overburdened by 30% or more, and 10.1% of owner households without a mortgage were cost overburdened by 30% of more. Additional housing problems that were discussed in consultation and received from citizen comments included: need for housing rehabilitation assistance, handicap accessible housing, and availability/accommodation of senior housing. It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types.

Even prior to COVID-19, Howard County saw housing characteristics that were linked with instability and increased risk of homelessness included single earner households with children and persons with a disability who are unable to obtain sustainable employment. Unexpected crises such as loss of income or loss of a second income earner to the household and/or a medical or transportation emergency cost contribute to destabilizing low- and moderate-income households. Many of these residents experience extreme rent burdens in Howard County, become unstable, and face homelessness with first-time crisis or loss of income.

Twelve (12) months into the pandemic; like many jurisdictions nationwide, Howard County continues to see a significant increase in filings for unemployment insurance, due to the COVID-19 pandemic. As a result of the economic shutdown, job loss, furloughs, and a reduction in pay for many employees is still having far-reaching negative consequences for many of the residents of the County. Based on an analysis of information provided by the U.S. Census data: lower income renter and owner households; elderly persons; single person households; large families; victims of domestic violence, dating violence, sexual assault and stalking; and persons with disabilities were more affected by these housing problems.

Through this application, Howard County is working to not only preserve and retain the affordable housing stock through housing rehabilitation projects but is also increasing the availability of affordable

OMB Control No: 2506-0117 (exp. 09/30/2021)

permanent housing for persons with disabilities, special needs populations and working families earning between 30-60% AMI in our community. To encourage homeownership, Howard County is working with income eligible household move towards the goal of homeownership by providing access to down payment assistance, to make the home purchase more affordable. We are also working with our nonprofit partners to help with critical facilities improvements to preserve these services and the clients they serve.

To address the complex issues contributing to homelessness in our community, the activities submitted provide a multi-facetted network of programs and support services that prevent homelessness as often as possible and coordinates care for homeless individuals and families, so they may become self-sufficient as quickly as possible.

2. Summarize the objectives and outcomes identified in the Plan

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

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

3. Evaluation of past performance

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

The most recently completed program year is 2019. Our Consolidated Annual Performance and Evaluation Report (CAPER) for 2019 contained the following observations:

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

- **Renter-Occupied Rehabilitation**: The County assisted 23 renter households (CDBG)
- **Special Needs Housing Rehabilitation**: The County assisted 2 units (CDBG)
- **Special Needs Facilities & Improvement Rehabilitation**: The County assisted 1 unit which serving person with severe disabilities (CDBG)
- **Low-income Working Housing:** The County assisted 2 units (CDBG)
- **Special Needs Housing Acquisition:** The County assisted 5 single room occupancy (SRO) units (HOME)
- **First Time Homebuyer Assistance**: The County assisted 5 households (HOME)

During FFY2019, the County was able to rehabilitate twenty-three (23) rental housing units, to increase safety and help preserve affordable housing for low-income families living in them. CDBG was also used

to create two (2) additional units of low-income households working in Howard County through acquisition of two (2) existing condominium units.

CDBG was used for the rehabilitation of one (1) sober-living facility and one (1) facility that serves a formerly homeless family to preserve access to affordable housing for income eligible Howard County residents. In addition, CDBG was used to rehabilitate one (1) public facility to preserve access to programs for persons with severe disabilities.

HOME program funds were used to acquire one (1) 2-bedroom condominium unit and one (1) 3-bedroom townhome unit to create five (5) single room occupancy (SRO) for five (5) extremely low-income persons that have a developmental disability in Howard County.

Lastly, HOME Program funds were used to assist five (5) moderate-income families to achieve homeownership with down payment and closing cost assistance.

Through CDBG public service funding; 290 people were diverted from homelessness through housing stabilization funding; 105 homeless individuals accessed critical social and support services for both the sheltered and unsheltered homeless; 101 victims of domestic violence/human trafficking were provided safe sheltering after fleeing situations of violence.

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

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Howard County, in compliance with the County's Citizen Participation Plan, advertised and held five (5) public hearings on the needs and goals of the County's CDBG and HOME Programs. The public hearings provided residents with the opportunity to discuss the programs and to offer their suggestions on future program priorities. The public hearings were advertised in The Howard County Times and Columbia Flier on November 19, 2020, December17, 2020, February 25, 2021, and March 25, 2021.

Howard County conducted three Virtual Public Needs Hearing on December 2, December 10, and December 15, 2020. The invitation was emailed to stakeholders from the Nonprofit Stakeholder list maintained by the Department of Housing and Community Development.

The County held it's a Virtual Public Hearing on January 7, 2021 at 1:30 PM in which the CDBG and HOME Program application for funding was announced. Howard County began the 30-Day Day Comment Period on February 22, 2021 which ran through Wednesday, March 24, 2021 at 11:59.9 PM.

The public notice was advertised February 25, 2021 in Howard County Times and Columbia Flyer regarding draft version of the FFY2021 Annual Action Plan being available for view on the County's website beginning February 22, 2021 at www.howardcountymd.gov under "Departments". All comments received by March 18, 2021 at 11:59.99 PM, were accepted.

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council office, were closed to the public until further notice. Government operations, including those of the County Council are continuing through teleworking.

Written comments were directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov. Written comments received by the end of the thirty (30) day Public Comment Period were all accepted.

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

5. Summary of public comments

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

The County held a number of public hearings and roundtable meetings during the creation of the Five Year Consolidated Plan. Participants were asked to provide their housing, homeless, other special, community development, economic development, and planning priority needs, as well as their input on how CDBG and HOME funds could be directed to address those needs.

The following needs were the most common needs discussed:

- Need for affordable housing
- Need for employment opportunities that pay a living wage employment
- Need for access to transportation
- Need for individualized supportive service and housing programs
- Need for comprehensive service referral network

The full *Needs Hearings Notes* can be found in Citizen Participation Backup found in AD-26 Administration screen.

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

All comments and views were incorporated into this plan.

7. Summary

Under the FFY 2021 CDBG Program, the County will receive a grant in the amount of $1,309,335 and anticipates $10,778.81 in Program Income for the year for a total FFY 2020 budget of $1,320,113.81. The County will budget $167,572.80 for general program administration and $84,000 for Fair Housing activities for a total Planning and Administration budget of $251,572.80 (19.1%). The balance of funds ($1,068,541.01) will be allocated to activities which principally benefit low- and moderate-income persons in the amount of $1,068,541.01 (100.0%) and $0 for the removal of slums and blight (0.0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities $618,746.58 (46.9%), Housing activities $274,173.30 (20.8%), and Public Service activities $175,621.13 (13.3%). The County meets the HUD regulations for project caps by allocating the following FFY 2021 CDBG funds:

- Planning and Administration $ 264,062.56 or 19.1% allocation (at the 20% cap)
- Public Services $175,621.12 or 13.3% allocation (below the 15% cap)
- Demolition $0 or 0.0%
- Urgent Need $0 or 0.0%

Under the FFY 2021 HOME Program, the County will receive a grant in the amount of $465,440 and anticipates $0 in program income for the year for a total FFY 2021 budget of $465,440. The County will use $116,360.00 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY 2021.

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

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

Elizabeth Meadows, Chief
Howard County Department of Housing & Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046
Phone: 410-313-6324
Fax: 410-313-5960

Email: emeadows@howardcountymd.gov

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

1. Introduction

Howard County conducted three Virtual Public Needs Hearing on December 2, December 10, and December 15, 2020. The invitation was emailed to stakeholders from the Nonprofit Stakeholder list maintained by the Department of Housing and Community Development.

The County held it's a Virtual Public Hearing on January 7, 2021 at 1:30 PM in which the CDBG and HOME Program application for funding was announced. Howard County began the 30-Day Day Comment Period on February 22, 2021 which ran through Wednesday, March 24, 2021 at 11:59.9 PM.

The public notice was advertised February 25, 2021 in Howard County Times and Columbia Flyer regarding draft version of the FFY2021 Annual Action Plan being available for view on the County's website beginning February 22, 2021 at www.howardcountymd.gov under "Departments". All comments received by March 18, 2021 at 11:59.99 PM, were accepted.

The County held the Forth Virtual Public Hearing on April 8, 2021 at the Housing Board bi-monthly meeting. A Fifth Virtual Public Hearing was held on April 19, 2021 at 7 PM during the Howard County Council's April Hearing. A full list of meeting notes can be found in the Citizens Participation appendix.

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

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

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

- **Howard County Department of Housing and Community Development -** oversees the County's CDBG and HOME grant programs.
- **Howard County Housing Commission -** manages the HUD Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing.

- **Social Services Agencies -** provides services to address the needs of low- and moderate-income persons.
- **Housing Providers -** rehabilitates and develops affordable housing for low- and moderate-income households.
- **Howard County Department of Community Resources and Services -** oversees the Continuum of Care (CoC) Network for Howard County, as well as public services utilized by low- and moderate-income households.

Collaboration and coordination with these entities will continue throughout the five-year period in order to capitalize on potential future funding opportunities, as well as potential project partnerships, that would result in increased benefits to low- and moderate-income households. Each year as a part of the CDBG and HOME application planning process these stakeholders are contacted to identify the County's housing and community development needs and priorities. Stakeholders are encouraged to attend a public hearing or respond directly to consultation contacts. Stakeholders are also invited to apply for CDBG and HOME funding for eligible activities.

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

The Howard County Coalition to End Homelessness consists of twenty-three (23) members representing Howard County government, Howard County School System, non-profit agencies, the business and faith communities, citizen advocates, and individuals with lived experience. The Coalition fulfills the HUD requirement to have a planning body designed to promote a communitywide commitment to the goal of ending homelessness. The Coalition is responsible for and committed to creating and driving a system of housing and care that responds to the needs of homeless individuals and families in Howard County with the mission to make homelessness rare, brief, and non-recurring.

CDBG and HOME funds are used to financially support and leverage efforts of the Coalition, including but not limited to: supportive service programs and facilities for the homeless and persons at-risk of becoming homeless; and assistance efforts to provide emergency shelter transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities for the homeless and person at-risk of becoming homeless.

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

The Howard County Coalition to End Homelessness uses a Coordinated Entry System to address the needs of homeless persons and those at risk of homelessness. The Coordinated Entry System is designed

to minimize barriers faced by individuals who are homeless in accessing the most appropriate and effective housing services to address their needs and incorporates a "housing first" philosophy in matching homeless individuals with services. The CoC uses ServicePoint HMIS software for its coordinated entry. Coordinated entry referrals prioritize all individuals and families who are the most vulnerable according to the VI-SPDAT, as well as those identified as meeting the HUD definition of chronically homeless.

The Coalition has four committees (Coordinated Entry, HMIS, Planning, and Rating and Ranking) that manages the administration of the CoC by: determining how to allocate ESG funds; developing performance standards and evaluate outcomes; and developing funding, policies and procedures for the administration of HMIS. The CoC reviews projects funded by the Continuum of Care, Emergency Solutions Grant and other related activities for compliance, application, and performance and makes recommendations on the allocation of resources to projects. The Committees ensure that there is a comprehensive and fair resource allocation process, as well as an effective system for addressing and monitoring the needs of people experiencing homelessness or who are at risk of becoming homeless.

The County's Department of Housing and Community Development is an active member of the Coalition and utilizes information shared by the Coalition to fund CDBG and HOME projects that address homelessness.

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

Table 2 – Agencies, groups, organizations who participated

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

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

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

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

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Making Change was consulted for information on the County's housing and community development needs.
20	**Agency/Group/Organization**	FIRN, INC.
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	FIRN was consulted for information on the County's housing and community development needs.
21	**Agency/Group/Organization**	Volunteers of America Chesapeake Inc.
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Volunteers of America was consulted to obtain information on the County's housing and community development needs.
22	**Agency/Group/Organization**	United Way of Central Maryland
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The United Way of Central Maryland was consulted to obtain information on the County's housing and community development needs.
23	**Agency/Group/Organization**	Chin Association of Maryland
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Chin Association of Maryland was consulted to obtain information on the County's housing and community development needs.
24	**Agency/Group/Organization**	FAMILY AND CHILDRENS SERVICES OF CENTRAL MARYLAND
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Family and Children's Services of Central Maryland was consulted to obtain information on the County's housing and community development needs.
25	**Agency/Group/Organization**	Maryland Legal Aid
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing Services - Victims

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Maryland Legal Aid was consulted to obtain information on the County's housing and community development needs.

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

All agencies were consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Howard Coalition for End Homelessness	The Path Home, Howard County's Strategic Plan to End Homelessness, Five-Year Plan 2020 to 2025. The CoC is the primary provider of housing and supportive services for the area's homeless and those at risk of being homeless population. The goals of the Country and the CoC are complementary.
5 Year Plan and Annual Action Plan	Howard County Housing Commission	The Howard County Housing Commission is the lead agency providing housing vouchers and affordable housing in the County. The goals of the County and Howard County Housing Commission are complementary.

OMB Control No: 2506-0117 (exp. 09/30/2021)

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Howard County General Plan	Howard County	PlanHoward 2030 is an update of the 2000 Howard County General Plan and was developed for guiding decisions related to development, land preservation, changing demographic and employment trends, neighborhood sustainability, capital projects, County services and other key issues. The goals of the County's Consolidated Plan and General Plan are complementary.
Regional Analysis of Impediments	BMC	Howard County is a participating member in the Baltimore Metropolitan Council's Regional Analysis of Impediments to Fair Housing Choice. The goals of the County's Consolidated Plan and the RAI are complementary.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Howard County's Department of Housing and Community Development is the lead planning and administrating agency for the County's CDBG and HOME programs. Close coordination is maintained between the Department and other county departments to ensure the needs for affordable housing and community development are being met.

The County participates in regional planning efforts that affect the County's housing and community development goals. For example, the County is participating in the Baltimore Metropolitan Council's Regional Analysis of Impediments to Fair Housing Choice. The AI participants are: City of Annapolis and the Housing Authority of the City of Annapolis; Anne Arundel County and the Housing Commission of Anne Arundel County; City of Baltimore and the Housing Authority of Baltimore City; Baltimore County and Office of Housing; Harford County and the Havre de Grace Housing Authority; and Howard County and the Howard County Housing Commission.

Additionally, the County coordinates and applies for funding through the Maryland Department of Housing and Community Development for programs that address the County's housing, homeless, and community development needs.

AP-12 Participation – 91.105, 91.200(c)

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

Howard County conducted three Virtual Public Needs Hearing on December 2, December 10, and December 15, 2020. The invitation was emailed to stakeholders from the Nonprofit Stakeholder list maintained by the Department of Housing and Community Development.

The County held it's a Virtual Public Hearing on January 7, 2021 at 1:30 PM in which the CDBG and HOME Program application for funding was announced. Howard County began the 30-Day Day Comment Period on February 22, 2021 which ran through Wednesday, March 24, 2021 at 11:59.9 PM.

The public notice was advertised February 25, 2021 in Howard County Times and Columbia Flyer regarding draft version of the FFY2021 Annual Action Plan being available for view on the County's website beginning February 22, 2021 at www.howardcountymd.gov under "Departments". All comments received by March 18, 2021 at 11:59.99 PM, were accepted.

The County held the Forth Virtual Public Hearing on April 8, 2021 at the Housing Board bi-monthly meeting. A Fifth Virtual Public Hearing was held on April 19, 2021 at 7 PM during the Howard County Council's April Hearing. A full list of meeting notes can be found in the Citizens Participation appendix.

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Needs Hearing December 2, 2020.	All comments can be found in the Citizen Participation Backup.	N/A	
2	Public Hearing	Non-targeted/broad community	Virtual WebEx Needs Hearing December 10,2020.	All comments can be found in the Citizen Participation Backup.	N/A	
3	Public Hearing	Non-targeted/broad community	Virtual WebEx Needs Hearing December 15,2020.	All comments can be found in the Citizen Participation Backup.	N/A	
4	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Hearing January 7, 2021.	All comments can be found in the Citizen Participation Backup.	N/A	
5	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Hearing April 8,2021	All comments can be found in the Citizen Participation Backup.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Non-targeted/broad community	Virtual WebEx Public Hearing	All comments can be found in the Citizen Participation Backup.	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Howard County completed the planning and writing of the FFY2021 Annual Action using estimated amounts that are the awarded totals the County received in FFY2020 for both CDBG and HOME programs. The County anticipates receiving $1,309,335 in CDBG and $465,440 in HOME funds for the FFY 2021 program year. To maintain compliance with requirements and timing for submission of the Annual Action Plan to HUD, the County chose to move forward with the planning, writing, 30-day public comment period with the anticipated amounts for these programs.

The County's FFY 2021 CDBG and HOME program year starts on July 1, 2021 and concludes on June 30, 2022. The County projects its CDBG and HOME allocations to remain level over the remaining three years of the five -year period.

In the event the FFY2021 CDBG and HOME Program awards vary from the FFY2020 award, Howard County intends to adjust the amounts equally

among the CDBG and the HOME projects.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,309,335	10,779	0	1,320,114	3,960,341	The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons. The County is funding fourteen (15) CDBG projects in FFY 2021.

OMB Control No: 2506-0117 (exp. 09/30/2021)

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: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	465,440	0	0	465,440	1,396,620	The HOME entitlement program allocates annual grants to larger cities and urban counties to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-and moderate-income people. The County is funding four (4) HOME projects in FFY 2021.

Table 5 - Expected Resources – Priority Table

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

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

Howard County has funded an additional $6,514,5 from the Community Services Partnership (CSP) Grants for County Fiscal Year 2022. Additionally, for the fourth year through the County's MIHU Fee-In-Lieu Program, ($400,000) will further support the goals set within this

FFY2021 Annual Action Plan. A proposed combined budget of $5,995,000 for the Housing Initiative Programs within the Howard County DHCD's Community Renewal Fund has been requested for County Fiscal Year 2022.

The County will use $116,360.00 for the 25% match contributions from the County's Banked Match from prior projects as HOME match for FFY2021.

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

The following publicly owned land and property within the jurisdiction is available for future development to address the needs identified in the Plan:

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

Discussion

The County's CDBG and HOME program year runs from July 1, 2021 through June 30, 2022. These funds will be used to address the following priority needs set within the FFY 2020 to FFY 2024 Consolidated Plan:

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HS-1 Housing Support	2020	2024	Affordable Housing	Howard County Target Area	Housing Priority	CDBG: $100,000 HOME: $160,000	Rental units constructed: 1 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted
2	HS-3 Housing Rehabilitation	2020	2024	Affordable Housing	Howard County Target Area	Housing Priority	CDBG: $304,173	Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Added: 25 Household Housing Unit
3	HO-1 Housing	2020	2024	Homeless	Howard County Target Area	Homeless Priority	CDBG: $30,000 HOME: $189,080	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1 Households Assisted Homeowner Housing Rehabilitated: 1 Household Housing Unit

OMB Control No: 2506-0117 (exp. 09/30/2021)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	HO-2 Operation/Support	2020	2024	Homeless	Howard County Target Area	Homeless Priority	CDBG: $140,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
5	SN-1 Housing	2020	2024	Non-Homeless Special Needs	Howard County Target Area	Other Special Needs Priority	CDBG: $24,000 HOME: $69,816	Rental units rehabilitated: 1 Household Housing Unit Homeless Person Overnight Shelter: 50 Persons Assisted
6	SN-2 Social Services	2020	2024	Non-Homeless Special Needs	Howard County Target Area	Other Special Needs Priority	CDBG: $35,621	Public service activities for Low/Moderate Income Housing Benefit: 45 Households Assisted
7	CD-1 Community Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Howard County Target Area		CDBG: $434,747	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 675 Persons Assisted
8	AM-1 Overall Coordination	2020	2024	Administration, Planning, and Management	Howard County Target Area	Administration, Planning, and Management Priority	CDBG: $251,573 HOME: $46,544	Other: 4 Other

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	HS-1 Housing Support
	Goal Description	Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling and down payment/closing cost assistance.
2	**Goal Name**	HS-3 Housing Rehabilitation
	Goal Description	Conserve and rehabilitate existing affordable housing units occupied by owners and renters by addressing code violations, emergency repairs and handicap accessibility.
3	**Goal Name**	HO-1 Housing
	Goal Description	Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities
4	**Goal Name**	HO-2 Operation/Support
	Goal Description	Support social service programs and facilities for the homeless and persons at-risk of becoming homeless.
5	**Goal Name**	SN-1 Housing
	Goal Description	Support an increase in the supply of decent, safe and sanitary housing that is affordable and accessible for the elderly, persons with disabilities, persons with HIV/AIDS, victim of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation and new construction of housing units.
6	**Goal Name**	SN-2 Social Services
	Goal Description	Support social services and programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, person with alcohol/drug dependency, and persons with other special needs.
7	**Goal Name**	CD-1 Community Facilities and Infrastructure
	Goal Description	Improve the County's public facilities and infrastructure through rehabilitation, reconstruction, and new construction.

8	**Goal Name**	AM-1 Overall Coordination
	Goal Description	Provide program management and oversight, for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

Projects

AP-35 Projects – 91.220(d)

Introduction

In order to address the identifiable needs of Howard County, the proposed FFY 2021 One-Year Action Plan proposes the following activities:

Projects

#	Project Name
1	CDBG Program Planning and Administration
2	Fair Housing Regional AI Coordinator
3	Columbia Housing Center Affirmative Marketing Program
4	Roger Carter Recreation Center Redevelopment
5	Emergency Public Facility
6	The United Way - Rehab
7	The Arc of Howard County - Rehab
8	Bridges to Housing Stability - Acquisition
9	Bridges to Housing Stability - Rehab
10	Howard County Housing Commission - Rehab
11	Living In Recovery - Rehab
12	Rebuilding Together - Homeowner Rehab
13	Community Action Council - Housing Stability
14	HopeWorks of Howard County - Transitional Housing
15	Grassroots
16	Affordable Housing Project
17	CHDO Set-Aside Project
18	Down Payment Assistance
19	HOME Program Planning and Administration

Table 7 - Project Information

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

AP-38 Project Summary

Project Summary Information

OMB Control No: 2506-0117 (exp. 09/30/2021)

1	**Project Name**	CDBG Program Planning and Administration
	Target Area	Howard County Target Area
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $167,572
	Description	Howard County will use CDBG funds towards the administration of the CDBG program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. The staff member is responsible for performing program related duties, such as financial, environmental, and program eligibility according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with the funding agency, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, preparing and submitting performance reports.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Howard County, Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046
	Planned Activities	Matrix Code: 21A General Program Administration 570.206(a)(1)
2	**Project Name**	Fair Housing Regional AI Coordinator
	Target Area	Howard County Target Area
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $9,000

	Description	Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County in cooperation with these jurisdictions contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which was formally accepted in 2020. The AI Coordinator works to guide the implementation of the regional initiatives to address identified potential impediments to Fair Housing Choice. This activity is funded out of the 20% Administration cap.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Countywide
	Planned Activities	Matrix Code: 21D Fair Housing Activities (subject to Admin cap) 24 CFR 570.206 (c)
3	**Project Name**	Columbia Housing Center Affirmative Marketing Program
	Target Area	Howard County Target Area
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: $75,000
	Description	The Columbia Housing Center, a 501 (c)(3) nonprofit organization, in response to new residential segregation patterns that are forming in parts of Columbia, will use CDBG funding to create a program based on the successful Oak Park Regional Housing Center, which will help landlords find tenants and tenants finds homes, while promoting racial integration. This effort helps Howard County carry out our duty to affirmatively further fair under the federal Fair Housing Act. This activity is funded out of the 20% Administration cap.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Countywide
	Planned Activities	Matrix Code: 21D Fair Housing Activities (subject to Admin cap) 24 CFR 570.206 (c)
4	**Project Name**	Roger Carter Recreation Center Redevelopment
	Target Area	Howard County Target Area
	Goals Supported	CD-1 Community Facilities and Infrastructure
	Needs Addressed	Community Development Priority
	Funding	CDBG: $196,984
	Description	The Howard County Housing Commission, a 501 (c)(3) nonprofit and a Howard County's Housing and Community Development Organization, invests annual CDBG funds under an approved Pre-award strategy for this project. The Roger Carter Recreation Center Re-development is a key vehicle for neighborhood revitalization. This activity will benefit the residents of Burgess Mill Station and surrounding Ellicott City area in the community located on Burgess Mill Way, Ellicott City, MD 21043.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 500 Howard County residents in FFY21.
	Location Description	300 Milltown Drive, Ellicott City, MD 21043
	Planned Activities	Eligible Activity: Matrix Code: 03E Neighborhood Facilities 24 CFR 570.201 (c)
5	**Project Name**	Emergency Public Facility
	Target Area	Howard County Target Area
	Goals Supported	SN-1 Housing
	Needs Addressed	Other Special Needs Priority
	Funding	CDBG: $24,000

	Description	The Howard County Housing Commission, a public body corporate and politic of the State of Maryland, and a Howard County Housing and Community Development Organization, invests annual CDBG funds under an approved Pre-award strategy for this project. This activity will allocate funds to support the property acquired by long-term leasing of a public facility being utilized as a provision of emergency housing. This activity ensures the safety of Howard County Residents who are struggling with domestic abuse.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 50 Howard County residents in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 03C Homeless Facilities (not operating costs) 24 CFR 570.201 (c) / National Objective: LMH Low/mod housing benefit providing or improving permanent residential structures that will be occupied by low/mod income households. 570208(a)(3)
6	**Project Name**	The United Way - Rehab
	Target Area	Howard County Target Area
	Goals Supported	CD-1 Community Facilities and Infrastructure
	Needs Addressed	Community Development Priority
	Funding	CDBG: $150,000
	Description	The United Way of Central Maryland, a 501 (c) (3) non-profit in Howard County will use CDBG funds in FFY21 to renovate a 9,000 square foot space in Columbia for uses as the new Family Center to meet the critical need for affordable, quality childcare in Howard County. Through is project, United Way is building the first non-profit, child-care center. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	The project will serve approximately **76** individuals in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 03M Child Care Centers 24 CFR 570.201 (c) / National Objective: LMC low/mod limited clientele benefit activities which are low / moderate income.
7	**Project Name**	The Arc of Howard County - Rehab
	Target Area	
	Goals Supported	CD-1 Community Facilities and Infrastructure
	Needs Addressed	Community Development Priority
	Funding	CDBG: $87,761
	Description	The Arc of Howard County, a 501 (c) (3) nonprofit will use CDBG funds for Replace 4,312SF of sidewalk and concrete, Re-place 7-8 Kw generator with new 21Kw generator with wifi, Re-place existing exterior lights with neo LED lights, Replace flooring Joey and Cloudburst locations (residential), and New kitchen cabinets and countertops at Rain Dream Hill (residential) in facilities that supports many activities and programs for persons with intellectual and developmental disabilities. Income eligibility: Howard County residents with severe disabilities that earn between zero and eighty percent of the area median income (AMI) for the HUD Baltimore- Columbia-Towson Metropolitan Statistical Area (MSA).
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The project will serve approximately **99** individuals and their families in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 03B Facilities for Persons with Disabilities 24 CFR 570.201 (c) / National Objective: LMC Low / mod limited clientele, at least 51% of which are low / mod income 570.208(a)(2).
	Project Name	Bridges to Housing Stability - Acquisition

OMB Control No: 2506-0117 (exp. 09/30/2021)

8	**Target Area**	Howard County Target Area
	Goals Supported	HS-1 Housing Support
	Needs Addressed	Housing Priority
	Funding	CDBG: $100,000
	Description	Bridges to Housing Stability, Inc., a 501 (c)(3) nonprofit, will utilized CDBG Program funds to acquire one (1) housing unit in FFY21 to rent to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This project will create 1 unit of affordable housing in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code 01: Acquisition of existing dwelling units. / National Objective: Low-Mod Housing LMH 570.208(a)(3)
9	**Project Name**	Bridges to Housing Stability - Rehab
	Target Area	Howard County Target Area
	Goals Supported	HS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: $30,000
	Description	Bridges to Housing Stability, Inc., a 501 (c)(3) nonprofit, will utilized CDBG Program funds to rehabilitate eight (8) rental housing units they own in their Alliance Program portfolio in FFY21. The renovations will make the homes safer and more accessible for disabled and aging family members. As well as addressing inefficient units with energy efficient upgrades. Bridges rents to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	This project will renovate **8** units of affordable housing in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 14A Rehabilitation; Single-Unit Residential / National Objective: LMH Low-Mod Housing 570.208 (a) (3)
10	**Project Name**	Howard County Housing Commission - Rehab
	Target Area	Howard County Target Area
	Goals Supported	HS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: $100,000
	Description	Howard County Housing Commission, Inc., a public body corporate and politic of the State of Maryland, will utilize CDBG Program funds to replace the roofs on twelve (12) affordable rental townhomes the Commission owns at Colts Crossings. All of the tenants that the Commissions serves this project have an income between 0-60% AMI as defined by HUD.Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This project will renovate **12** units of affordable housing in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 14B Rehabilitations; Multi-Unit Residential / National Objective: Low-Mod Housing LMH 570.208 (a)(3)
11	**Project Name**	Living In Recovery - Rehab
	Target Area	Howard County Target Area
	Goals Supported	HS-3 Housing Rehabilitation
	Needs Addressed	Homeless Priority

	Funding	CDBG: $30,000
	Description	Living in Recovery Inc., a 501 (c) (3) non-profit in Howard County will utilized CDBG funds in FFY21 for a roof re-placement and replace windows with thermal efficiency windows in one their sober living facilities. Income eligibility: Howard County residents recovering from addictions that earn between zero and eighty percent of the area median income (AMI) for the HUD Baltimore- Columbia-Towson Metropolitan Statistical Area (MSA).
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The project will serve approximately **8** individuals in FFY21.
	Location Description	7105 Old Columbia Road, Columbia, MD 21046
	Planned Activities	Matrix Code: 03C Homeless Facilities (not operating costs) / National Objective: LMC Low-Mod Clientele 570.208 (a)(2)
12	**Project Name**	Rebuilding Together - Homeowner Rehab
	Target Area	Howard County Target Area
	Goals Supported	HS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: $174,173
	Description	Rebuilding Together, Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide free home repairs to Howard County low to moderate income homeowners to preserve the stock of safe, affordable single-family homes in Howard County. Rebuilding Together clients include veterans, people with disabilities, families with small children and the elderly. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately **25** households in Howard County in FFY21.

	Location Description	Countywide
	Planned Activities	Matrix Code: 14A Rehabilitation; Single Unit Residential / National Objective: LMH Low-Mod Housing 570.208 (a)(3)
13	**Project Name**	Community Action Council - Housing Stability
	Target Area	Howard County Target Area
	Goals Supported	HO-2 Operation/Support
	Needs Addressed	Homeless Priority
	Funding	CDBG: $100,000
	Description	The Community Action Council of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide housing stability for low and moderate-income Howard County residents through eviction prevention for low to moderate income households in Howard County. Direct payment to landlords and/or mortgage companies will be made based on an eviction judgment. Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore Metropolitan Region, adjusted by family size, as established by HUD. Eligibility requirement: Direct payments based on eviction judgement/proceedings.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately **60** households in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 05Q Subsistence Payments / National Objective: LMC limited clientele, which at least 51% of the clients are low-mod income 570.208(a)(2)
14	**Project Name**	HopeWorks of Howard County - Transitional Housing
	Target Area	Howard County Target Area
	Goals Supported	SN-2 Social Services
	Needs Addressed	Other Special Needs Priority
	Funding	CDBG: $35,621

	Description	Hope Works of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide partial salary for the Transitional Housing Victims Advocate and partial utility payments for their transitional houses to operate their program. The Transitional Housing Program provides housing to Howard County residents that are made homeless due to sexual and intimate partner violence and allows victims to be housed for up to one (1) year. Clients have access to all Hope Works services such as legal advocacy/representation, clinical counseling and case management. Referrals for employment training, education and other community services are also available. Hope Works is the sole provider of comprehensive domestic violence and rape crisis and recovery services in Howard County. Specifically, Hope Works is the only residential program in the county that has the experience, expertise and internal capacity necessary to address the multiple, interlocking needs of domestic violence victims, and their families.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately **45** households in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 05G Service for victims of domestic violence, dating violence, sexual assault or stalking / LMC limited clientele, at least 51% of which are low-mod income 570.208(a)(2)
15	**Project Name**	Grassroots
	Target Area	Howard County Target Area
	Goals Supported	HO-2 Operation/Support
	Needs Addressed	Homeless Priority
	Funding	CDBG: $40,000

	Description	Grassroots Crisis Intervention Center, Inc. (Grassroots), a 501 (c)(3) nonprofit, will utilize CDBG funds for utility expenses associated with their Crisis Intervention Center / Homeless Shelter location. This public facility is a multi-service crisis intervention center providing 24-hour crisis intervention services, emergency and transitional shelter, and community education. Grassroots operates a 24-hour general crisis hotline and walk-in counseling program and is the first point of contact in the County for homeless services. The agency operates the Mobile Crisis Team, in partnership with Humanim, to respond with the Police to psychiatric emergencies and family crises in the community. Special youth services include the Maryland Crisis Hotline, the Runaway Intervention Program, outreach and educational programs. Staff also respond to requests from the community for crisis intervention services following a traumatic event. The Crisis Intervention Service is certified by the American Association of Suicidology.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately **40** Howard County households in FFY21.
	Location Description	Countywide
	Planned Activities	Matrix Code: 03T Homeless / Aids Patient Programs / National Objective: LMC limited clientele, which at least 51% of the clients for low-mod income 570.208(a)(2)
16	**Project Name**	Affordable Housing Project
	Target Area	Howard County Target Area
	Goals Supported	HO-1 Housing
	Needs Addressed	Housing Priority
	Funding	HOME: $189,080

	Description	Howard County will allocate HOME Program funds for new construction, property acquisition, disposition, and rehabilitation in connection with the development of affordable housing units. This includes but is not limited to the provision of new rental housing, tenant-based rental assistance, and down payment and closing cost assistance that will create affordable housing units while simultaneously preventing and reducing instances of homelessness. This activity will utilize $189,080.00 of HOME Program Entitlement (EN) funds. Income eligibility: Howard County residents with severe disabilities that earn between zero and sixty percent
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This Project will serve approximately 1 households in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Creation of one unit of affordable housing.
17	**Project Name**	CHDO Set-Aside Project
	Target Area	Howard County Target Area
	Goals Supported	SN-1 Housing
	Needs Addressed	Other Special Needs Priority
	Funding	HOME: $69,816
	Description	CHDO set-aside finds may be used for projects that are owned, developed, or sponsored by a nonprofit that qualifies as a CHDO as defined at 24 CFR Â§92.2. Previously, these roles were limited to development activities that is, projects that involved acquisition, rehabilitation, and/or new construction of housing for sale or rent to low-income families. However, the 2013 HOME Final Rule amended the definitions of these roles and now nonprofits can also own and manage HOME-assisted housing that it does not develop. iHomes, Inc., a 501 (c) (3) nonprofit and only certified CHDO in Howard County will use these CHDO funds in a future project. Anticipated Income eligibility: Howard County residents with severe disabilities that earn between zero and sixty percent.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	This project will create 1 unit of affordable housing in Howard County in FFY21.
	Location Description	Countywide
	Planned Activities	Create on (1) unit of affordable housing.
18	**Project Name**	Down Payment Assistance
	Target Area	Howard County Target Area
	Goals Supported	HS-1 Housing Support
	Needs Addressed	Housing Priority
	Funding	HOME: $160,000
	Description	The Department of Housing and Community Development will provide down payment and /or closing cost assistance to eligible homebuyers for the purchase of one dwelling unit in Howard County. Income eligibility: Howard County residents that earn between zero and eighty percent. Eligibility requirement: Homebuyer activity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The project will **create 5 units** of affordable housing in FFY21.
	Location Description	Countywide
	Planned Activities	Create 5 (5) single-family housing units.
19	**Project Name**	HOME Program Planning and Administration
	Target Area	Howard County Target Area
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	HOME: $46,544

	Description	Howard County will use HOME funds towards the administration of the HOME program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. Staff members are responsible for performing program related duties, such as financial, environmental, and program eligibility review according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with funding agencies, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, tracking match, monitoring program rents and incomes and preparing and submitting performance reports.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Howard County Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046
	Planned Activities	Countywide

AP-50 Geographic Distribution – 91.220(f)

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

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

Geographic Distribution

Target Area	Percentage of Funds
Howard County Target Area	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The County has allocated its CDBG and HOME Program funds for FFY 2021 based on which activities will principally benefit low- and moderate-income persons.

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

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

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

Discussion

Under the FFY 2021 CDBG Program, the County will receive a grant in the amount of $1,309,335 and anticipates $10,778.81 in Program Income for the year for a total FFY 2020 budget of $1,320,113.81. The County will budget $167,572.80 for general program administration and $84,000 for Fair Housing activities for a total Planning and Administration budget of $251,572.80 (19.1%). The balance of funds ($1,068,541.01) will be allocated to activities which principally benefit low- and moderate-income

persons in the amount of $1,068,541.01 (100.0%) and $0 for the removal of slums and blight (0.0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities $618,746.58 (46.9%), Housing activities $274,173.30 (20.8%), and Public Service activities $175,621.13 (13.3%). The County meets the HUD regulations for project caps by allocating the following FFY 2021 CDBG funds:

- Planning and Administration $ 264,062.56 or 19.1% allocation (at the 20% cap)
- Public Services $175,621.12 or 13.3% allocation (below the 15% cap)
- Demolition $0 or 0.0%
- Urgent Need $0 or 0.0%

Under the FFY 2021 HOME Program, the County will receive a grant in the amount of $465,440 and anticipates $0 in program income for the year for a total FFY 2021 budget of $465,440. The County will use $116,360.00 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY 2021.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	107
Special-Needs	1
Total	108

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	60
The Production of New Units	2
Rehab of Existing Units	46
Acquisition of Existing Units	0
Total	108

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

Discussion

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

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

- Rehab forty-six (46) existing affordable housing units - incomes below 60%AMI;
- Acquire one (1) existing units (1) family unit below 60% AMI,
- Acquire one (1) single-family unit by CHDO to create Special Needs Rental housing - incomes below 60% AMI; and
- Provide rental assistance to 60 households, preventing homelessness.

AP-60 Public Housing – 91.220(h)

Introduction

Howard County has identified that there is a need for decent, safe, and sanitary housing that is affordable and accessible to address the households affected by housing problems, severe housing problems, and housing cost burdens. The largest income group affected by housing problems in the County are extremely low-income households. The Howard County Housing Commission is a vital part of the County's affordable housing strategy. The Housing Commission is the primary assisted housing provider of housing for extremely low income, very low income, and lower income residents of Howard County. Howard County no longer operates a Public Housing Program due to the conversion of our 50 Public Housing Units to RAD Vouchers. This means that while the units are still owned by the Housing Commission, tenants are free to take their tenant- based vouchers and relocate to any other area of opportunity that meets their individual needs.

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

The Housing Commission has developed partnerships with Bridges to Housing Stability, the Howard County Department of Corrections, and the Howard County Health Department to provide housing and supportive services individuals with disabilities, homeless individuals, and returning citizens.

The Housing Commission will continue its participation in the Baltimore Regional Project-Based Voucher (PBV) Program that is designed to encourage new quality affordable rental housing in the metropolitan Baltimore area, particularly in safe neighborhoods with high quality public schools that are close to job growth. In 2019, the Housing Commission was awarded twenty (20) project-based vouchers for the Artist Flats at New Cultural Center.

The Housing Commission is actively pursuing funding for a multi-year demonstration project that would enable participants in the Housing Choice Voucher Program (HCVP) to relocate to neighborhoods with less poverty. The proposed voucher de-concentration plan would enable: disadvantaged families to benefit from the opportunities that come with living in surroundings that are more economically diverse; at- risk neighborhoods to benefit from an infusion of families that have more moderate ranges of income lessening the concentration poverty and stabilizing property values; stabilize neighborhoods; and support more racially and economically-mixed neighborhoods.

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

The Howard County Housing Commission operates a Housing Choice Voucher for Homeownership Program. The Commission does not limit participation in the program. The program eligibility

requirements are as follows:

- Families participating in the Section 8 Homeownership Program must be in good standing, and must have participated in the Section 8 Program, or other Howard County or Housing Commission programs for at least 2 years prior to execution of the Contract of Sale. The family must also have participated in the Family Self Sufficiency Program for a period of at least 6 months prior to the date of settlement.
- The minimum income required for program participation is $24,000. If the family meets the HUD minimum income requirements of the Federal Minimum hourly wage rate multiplied by 2,000 hours, and has been pre-qualified for financing with a lending institution which meets the requirements of Section 25.7 of this plan, they are exempted from the $24,000 minimum income requirement.
- Welfare assistance shall not be counted towards the $24,000 minimum income requirement unless the head of household is elderly or disabled, as defined in the Administrative Plan.
- Eligible families must demonstrate that at least one adult member of the family who will own the home at commencement of homeownership assistance is currently employed at least 30 hours per week, and has been continuously employed for at least one year prior to commencement of homeownership assistance. This requirement does not apply for families where the head of household is elderly or disabled.
- In order to qualify for participation in the Section 8 Homeownership Program, the family must qualify as a "first-time homeowner". A first-time homeowner is defined as a family of which no member owned or presently has any ownership interest in a unit during the three years before commencement of homeownership assistance. A first-time homeowner also includes a single parent or displaced homemaker who while married, owned a home with his or her spouse, or resided in a home owned by his or her spouse.
- Eligible families shall not include any family with a member who has previously received assistance under the homeownership option, and has defaulted on a mortgage securing debt incurred to purchase the home.
- Prior to commencement of homeownership assistance, the family must attend and satisfactorily complete pre-assistance homeownership counseling with a HUD approved counseling agency, or an equivalent program of counseling activities as designated by the Commission.

The Howard County Housing Commission operates a Family Self-Sufficiency Program. The Commission does not limit participation in the program if demand exceeds the HUD required size limit.

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

provided or other assistance

N/A

Discussion

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

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

Introduction

The Coordinated System of Homeless Services (CSHS) is a network of community services and supports that coordinates efforts to end homelessness in Howard County. CSHS is comprised of 23 members which offer resources to households in need, to prevent loss of stable housing or regain housing that has been lost. Financial assistance is available through multiple community partners; households needing additional resources may contact the system's Single Point of Entry for assessment and connection to varying levels of support.

Intensive Case Management services assist households to:

- identify and address barriers to housing stability
- connect to resources and ongoing supports
- identify appropriate and affordable housing

CSHS also directly includes:

- employment services
- addiction and trauma treatment
- support for domestic violence survivors

Reentry services and supports for school-age children through Howard County's Public School System.

A Housing Specialist provides expertise to locate housing for individuals and families whose past rental history is a barrier to securing new housing. The Landlord Guarantee Program provides protection to landlords who rent to these households. Flexible Financial Assistance is available to help with security

deposits, rent, and other items that support housing stability plans.

CSHS Partners:

- Bridges to Housing Stability
- Community Action Council
- Family and Children's Services of Maryland
- Grassroots Crisis Intervention Center
- HopeWorks
- Howard County Department of Community Resources and Services
- Howard County Department of Corrections
- Howard County Health Department
- Howard County Housing Commission
- Howard County Office of Workforce Development
- Howard County Public School System
- Humanim
- Laurel Advocacy and Referral Services
- Making Change
- Salvation Army

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

Howard County adopted a local Plan to End Homelessness (PEH) in 2010 and updated the plan in February of 2020 known as The Path Home. The Path Home establishes strategic goals that will align resources and services within the homeless response system. The strategic goals will guide specific annual action plans. The goals and action plans will place emphasis on ensuring that the coordinated entry system includes necessary, appropriate, quality interventions and sufficient capacity to meet the needs of those presenting to the system. These interventions will be housing first and housing resources focused.

Howard County uses a Coordinated Entry System to meet the individualized needs of homeless persons. It utilizes the following four (4) steps:

1. Access through entry points known to the community. Accomplished by: hotline, prevention, safe house, and street outreach.
2. Assess strengths, barriers, and vulnerabilities. Accomplished by: triage and standard assessment VI-SPDAT and Prevention Targeting Tool.
3. Prioritize specific and defined set of criteria. Accomplished by: By-Name list.

4. Refer connection to available resources. Accomplished by: prevention, shelter, case management, rapid rehousing, and permanent supportive housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

Howard County's Strategic Plan to End Homelessness's Goal #2 is to ensure that every person experiencing homelessness in Howard County has access to immediate, safe, and appropriate shelter. An effective homeless response system includes immediate access to low-barrier emergency shelter coupled with skilled, engaged street outreach. The Coalition is committed to ensuring that no person is forced to sleep in a place not intended for human habitation or loses their life because of their homeless experience. The Coalition will provide continuous outreach to unsheltered homeless individuals who otherwise might not seek out services, and ensure sufficient emergency shelter capacity to meet the needs of the community. Howard County intends to meet this goal by:

- Ensure adoption of a system-wide housing first approach by all Coalition members and eliminate policies and practices that do not embrace a housing first approach. This includes county residency requirements; participation in services; income requirements; and behavior requirements unrelated to health and safety.
- Establish a housing-focused street outreach team whose primary responsibility is to identify and engage people experiencing unsheltered homelessness and connect them to shelter (if available and desired) and coordinated entry for permanent housing resources.
- The CoC should collect, review and analyze key output and performance measure outcome data to ensure on-going effectiveness of street outreach services.
- Continue implementation of a low-barrier, housing first approach to accessing and staying in emergency shelter in Howard County, and eliminate requirements unrelated to health and safety to access and remain in shelter.
- Provide housing-focused, rapid-exit services to quickly connect all households residing in emergency shelter to safe and appropriate permanent housing.
- Regularly review program level data on shelter outcomes relating to placement rates in permanent housing, timely exits and cost-effectiveness to target system performance improvement strategies.
- Target limited transitional housing resources to the most vulnerable people experiencing homelessness by participating in the coordinated entry system, and eliminate rules that screen people out due to perceived barriers.
- Shift the focus of supportive services in transitional housing programs to align with a housing-focused, rapid-exit approach.

(Source: The Path Home, Howard County's Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 25)

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

Howard County's Strategic Plan to End Homelessness's Goal #3 is to increase access to permanent housing for people experiencing homelessness in Howard County. An effective homeless response system has an affordable and diverse supply of housing that meets the needs of the most vulnerable persons. Currently, households experiencing homelessness in Howard County struggle to access permanent housing in a timely manner. Challenges include limited landlord engagement and recruitment; limited affordable housing; and limited rapid re-housing program capacity. Howard County intends to meet this goal by:

- To ensure that the most vulnerable households fleeing domestic violence, dating violence, sexual assault, and stalking are prioritized for all available housing resources within the CoC, and to come into compliance with federal and state requirements, HopeWorks HSP (ESG) funded program should more fully participate in the coordinated entry system.
- To increase permanent housing opportunities and decrease the time people experience homelessness in Howard County, the CoC Lead Agency should coordinate a systemwide landlord engagement strategy to create a pipeline of available units informed by data and the coordinated entry process.
- Adopt the National Alliance to End Homelessness' Rapid Re-Housing Performance Benchmarks and Program Standards to fully incorporate the three core components and current best practices into CoC rapid re-housing projects.
- Scale up rapid re-housing resources to make it the primary housing intervention in Howard County CoC.
- Assess current permanent supportive housing projects and formalize a "move on" strategy to increase system flow and to ensure that this deep resource is serving the most vulnerable households using a dynamic prioritization approach.
- Ensure that all permanent supportive housing adopts and implements a housing first approach in both policy and practice.

(Source: The Path Home, Howard County's Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 27)

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.

Howard County's Strategic Plan to End Homelessness's Goal #1 is to ensure that there are no new or repeat episodes of homelessness in Howard County. An effective homeless response system is one that safely and appropriately diverts households from homelessness and provides targeted homelessness prevention whenever possible. Howard County's Coordinated Entry System will provide comprehensive, housing first services that apply a lens of racial equity, are culturally competent, and are guided by evidence-based best practices to minimize the duration and compounding impact of homelessness. This will include supportive pathways for those who do experience homelessness to achieve income maximization, exit to stable housing quickly, and prevent a repeat episode of homelessness in the future. Howard County intends to meet this goal by:

- Undertake a review and analysis of all prevention programs and prevention-type services that are both, operating in Howard County, and based on the goals of The Path Home.
- Determine which programs most appropriately align with the role of the homeless response system and which may be better funded outside the system.
- Establish a system-wide homeless prevention program — with written standards — to include a standardized assessment and performance measure outcome benchmarks and goals.
- Develop and support a robust structure to implement diversion strategies and measure the impact on the homeless response system.
- To increase employment opportunities for households experiencing homelessness in Howard County, the CoC Lead Agency should coordinate a system-wide employment strategy informed by data and the coordinated entry process.
- The Coalition, led by the CoC Board, should explore and identify factors driving racial and ethnic disparities to determine who is experiencing homelessness and how different types of permanent housing resources are distributed by the homeless services system.
- The CoC Board should develop an action plan to reduce disparities and establish community-level performance measured outcome goals to track progress on these efforts.
- Re-assess and streamline current coordinated entry core elements — the ACCESS, ASSESS, PRIORITIZE and REFER processes — to achieve simplicity, clarity and transparency in system coordination and decision-making.
- Develop a dashboard using HMIS to track progress on system flow improvements and outcomes.

(Source: The Path Home, Howard County's Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 23)

Discussion

The Howard County Department of Housing and Community Development (DHCD) will fund the

following FYY 2020 CDBG and HOME projects that will address homeless and other special needs:

- Emergency Public Facility (Other special needs)
- Help End Homelessness – Acquisition (Homeless need)
- Grassroots Shelter Program (Homeless need)
- HopeWorks of Howard County – Transitional Housing (Other special needs)
- Community Action Council – Housing Stability (Homeless need)
- iHomes – Housing Rehabilitation (Other special needs)
- Help End Homelessness (Homeless need)
- Affordable Housing Project (Homeless need)

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

Introduction:

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

The Office of Human Rights is responsible for the following actions:

- Investigate and process complaints of unlawful discrimination in Employment, Housing, Public Accommodation, Law Enforcement and Financing (Lending Institutions).
- Resolve complaints by conference, conciliation or through mediation.
- Enforce the Howard County Human Rights Law.
- Conduct public hearings on issues affecting the protection and promotion of Human Rights.
- Conduct studies, surveys and publishes reports.
- Recommend policies on Civil and Human Rights to the County Executive.
- Cooperate with other local, state, and federal agencies and officials to protect and promote better human relations.
- Serve as advocate to address issues involving discrimination, human relations and diversity.
- Initiate and participates in outreach activities and events with governmental and community organizations.
- Serve as a liaison with the public, governmental agencies and community groups to develop educational programs, heightens public awareness of discrimination and methods of eliminating discrimination.

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

The following action items that correspond to the number (1-10) fair housing issues/impediments were identified in the RAI to address public policies that could discourage affordable housing and residential investment:

1. Explore existing County policies that may inhibit the creation of affordable housing, such as County Bill 18-2014.

2. Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of the Fair Housing Action Center of Maryland.
3. Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units, especially in areas along transportation routes.
4. Support efforts to nurture and sustain racially integrated communities in Howard County, such as the new Columbia Housing Center.
5. Open up new land use opportunities through zoning changes (e.g. commercial and industrial zones could allow affordable units) and/or donated land.
6. Continue or increase funding for creating units and/or subsidizing tenant rents in opportunity areas. (e.g. dedicated funding source for affordable housing).
7. Explore increased FMRs and/or Increased exception payment standards and provide mobility counseling to encourage voucher location in Opportunity Areas.
8. "Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that: a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population; b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas."
9. Engage lenders in discussions about homeownership and mortgage lending disparities and how to address. Seek investments in financial literacy programs (including in schools) and assistance in helping subprime loan holders refinance to conventional loans. Develop specific action steps to address disparities in the minority homeownership rate.
10. Ensure that people with disabilities have control in the choice of their service provider by prohibiting leases that require tenants to receive supportive services from the provider operating the housing. Ensure that tenants cannot be evicted or discharged for reasons

Link to the Baltimore Regional Analysis of Impediments Plan:

https://www.howardcountymd.gov/Housing_Publications

Discussion:

The County will fund the following affordable housing projects with FFY 2021 CDBG and HOME funds:

- Fair Housing Regional AI Coordinator – Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County in cooperation with these jurisdictions contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which will be formally accepted in 2020. The AI Coordinator works to guide the implementation of the

regional initiatives to address identified potential impediments to Fair Housing Choice.

- Columbia Housing Center Affirmative Marketing Program – The Columbia Housing Center, a 501 (c)(3) nonprofit organization, in response to new residential segregation patterns that are forming in parts of Columbia, will use CDBG funding to create a program based on the successful Oak Park Regional Housing Center, which will help landlords find tenants and tenants finds homes, while promoting racial integration. This effort helps Howard County carry out our duty to affirmatively further fair under the federal Fair Housing Act.
- Bridges to Housing Stability Acquisition – Bridges to Housing Stability, a 501 (c)(3) nonprofit, will utilized CDBG Program funds to acquire one (1) housing unit in FFY21 to rent to a to persons working in Howard County earning between 30 percent and 60 percent AMI as defined by HUD.
- Bridges to Housing Stability, Inc., a 501 (c)(3) nonprofit, will utilized CDBG Program funds to rehabilitate eight (8) rental housing units they own in their Alliance Program portfolio in FFY21.
- Howard County Housing Commission, Inc., a public body corporate and politic of the State of Maryland, will utilize CDBG Program funds to replace the roofs on twelve (12) affordable rental townhomes the Commission owns at Colts Crossings.
- Living in Recovery Inc., a 501 (c) (3) non-profit in Howard County will utilized CDBG funds in FFY21 for a roof re-placement and replace windows with thermal efficiency windows in one their sober living facilities to help preserve affordability.
- CHDO Set-Aside Project - iHomes, Inc**.,** a 501 (c) (3) nonprofit and only certified CHDO in Howard County will use these CHDO funds in a future project.
- Rebuilding Together Homeowner Rehab – Rebuilding Together, Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide free home repairs to Howard County low to moderate income homeowners to preserve the stock of safe, affordable single-family homes in Howard County. Rebuilding Together clients include veterans, people with disabilities, families with small children and the elderly.
- Future Affordable Housing Project – Howard County will allocate HOME Program funds for new construction, property acquisition, disposition, and rehabilitation in connection with the development of affordable housing units. This includes but is not limited to the provision of new rental housing, tenant-based rental assistance, and down payment and closing cost assistance that will create affordable housing units while simultaneously preventing and reducing instances of homelessness.
- Down Payment Assistance – The Department of Housing and Community Development will provide down payment and/or closing cost assistance to five (5) eligible homebuyers for the purchase of an affordable dwelling unit in Howard County.

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

Despite the County's best efforts and efforts of service providers, there continue to be obstacles to meeting the underserved needs in Howard County. Some of these needs are the: high cost of housing; gap between incomes and housing costs; high cost of developable land; accessible housing needs; and cycle of poverty. Under the FFY 2021 CDBG Program the County will take the following actions to better address underserved needs:

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

Actions planned to foster and maintain affordable housing

The County will fund the following affordable housing projects with FFY 2021 CDBG and HOME funds:

- Fair Housing Regional AI Coordinator
- Columbia Housing Center Affirmative Marketing Program
- Bridges to Housing Stability Acquisition
- Bridges to Housing Stability Rehab
- Howard County Housing Commission Rehab
- Living In Recovery Rehab
- Rebuilding Together Homeowner Rehab
- CHDO Set-Aside Project
- Future Affordable Housing Project
- Down Payment Assistance

Actions planned to reduce lead-based paint hazards

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

start of the actual rehabilitation or purchase of the property to ensure the health of residents:

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

Actions planned to reduce the number of poverty-level families

Based on 2011-2015 ACS data, approximately 5.2% of the County's residents live in poverty, which is less than the State of Maryland's poverty rate of 10.0%. Female-headed households with children are particularly affected by poverty at 19.9% and 6.3% of all youth under the age of 18 were living in poverty. The County's goal is to reduce the extent of poverty by actions the County can control and through work with other agencies and organizations. During this program year, the County will fund the following activities with FFY 2021 CDBG and HOME funds to reduce the number of poverty-level

families:

- Fair Housing Regional AI Coordinator
- Columbia Housing Center Affirmative Marketing Program
- Roger Carter Recreation Center Redevelopment
- Emergency Public Facility
- United Way Rehab
- The Arc Rehab
- Bridges to Housing Stability Rehab
- Bridges to Housing Stability Acquisition
- The Howard County Housing Commission Rehab
- Living In Recovery Rehab
- Rebuilding Together Homeowner Rehab
- Grassroots Shelter Program
- HopeWorks of Howard County Transitional Housing
- Community Action Council Housing Stability
- CHDO Set-Aside Project
- Future Affordable Housing Project
- Down Payment Assistance

Actions planned to develop institutional structure

Housing and Community Development coordinates activities among the public and private agencies and organizations in the County. This coordination will ensure that the goals and objectives outlined in the FFY 2020-2024 Five Year Consolidated Plan will be effectively addressed by more than one entity. The following entities will carry out the FFY 2021 annual goals and objectives:

- Howard County Housing Commission – manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing.
- Howard County Department of Community Resources and Services – oversees the County's CoC and administers the County's aging and disability services.
- Baltimore Metropolitan Council – will provide fair housing education.
- Howard County Office of Human Rights – will provide fair housing education.
- Help End Homelessness Howard County – will provide housing to a homeless family.
- Rebuilding Together – will provide housing rehabilitation to qualified owner-occupied

households
- Grassroots Crisis Intervention Center – will provide supportive services to homeless persons.
- United Way – will provide affordable childcare to low-income County residents.
- HopeWorks – will provide transitional housing.
- Community Action Council – will provide housing stability assistance to prevent eviction.
- Living in Recovery – will provide recovery housing.

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

The County's Housing and Community Development Department will continue to act as a coordinator between housing and social service activities provided by the County and activities provided by the Housing Authority, the Continuum of Care, private and non-profit housing providers, and social service agencies to address the housing and community development needs of the County. The Department will accomplish this coordination by continuing to attend outside agency planning meetings, provide technical assistance for funding options and program compliance, participate in planning initiatives, and act as network connection between entities. The Department will coordinate with the following entities to address the FFY 2021 annual goals and objectives:

- Howard County Housing Commission – manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing.
- Howard County Department of Community Resources and Services – oversees the County's CoC and administers the County's aging and disability services.
- Baltimore Metropolitan Council – will provide fair housing education.
- Howard County Office of Human Rights – will provide fair housing education.
- Bridge to Housing Stability – will provide housing to a homeless family.
- Rebuilding Together – will provide housing rehabilitation to qualified owner-occupied households
- Grassroots Crisis Intervention Center – will provide supportive services to homeless persons.
- United Way – will provide affordable childcare to County residents.
- HopeWorks – will provide transitional housing.
- Community Action Council – will provide housing stability assistance to prevent eviction.
- Living in Recovery – will provide recovery housing.

Discussion:

The Department of Housing and Community Development has the primary responsibility for monitoring the County's Consolidated Plan and Annual Action Plan. The Department maintains records on the progress toward meeting the goals and the statutory and regulatory requirements of each activity. The Department has a monitoring process that is focused on analyzing and comparing projects and activities based on program performance, financial performance, and regulatory compliance. The accomplishments of the FFY 2021 CDBG and HOME activities will be reported in the FFY 2021

Consolidated Annual Performance and Evaluation Report (CAPER) and be used as a basis for future funding decisions.

Program Specific Requirements

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

Introduction:

Under the FFY 2021 CDBG Program, the County will receive a grant in the amount of $1,309,335 and anticipates $10,778.81 in Program Income for the year for a total FFY 2020 budget of $1,320,113.81. The County will budget $167,572.80 for general program administration and $84,000 for Fair Housing activities for a total Planning and Administration budget of $251,572.80 (19.1%). The balance of funds ($1,068,541.01) will be allocated to activities which principally benefit low- and moderate-income persons in the amount of $1,068,541.01 (100.0%) and $0 for the removal of slums and blight (0.0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities $618,746.58 (46.9%), Housing activities $274,173.30 (20.8%), and Public Service activities $175,621.13 (13.3%). The County meets the HUD regulations for project caps by allocating the following FFY 2021 CDBG funds:

- Planning and Administration $ 264,062.56 or 19.1% allocation (at the 20% cap)
- Public Services $175,621.12 or 13.3% allocation (below the 15% cap)
- Demolition $0 or 0.0%
- Urgent Need $0 or 0.0%

Under the FFY 2021 HOME Program, the County will receive a grant in the amount of $465,440 and anticipates $0 in program income for the year for a total FFY 2021 budget of $465,440. The County will use $116,360.00 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY 2021.

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

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

5. The amount of income from float-funded activities	0
Total Program Income:	**10,779**

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

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

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

   See attached HOME Policies and Procedures.

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

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

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

See attached HOME Policies and Procedures.

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

   See attached HOME Policies and Procedures.

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

Howard County Affordable Rent Standards for the CDBG Program

Howard County provides funds to project sponsors and clients to acquire, rehabilitate and otherwise assist with the development of housing, both owner-occupied and rental, for low and moderate-income persons. In order for CDBG funds to be utilized to assist a rental project, rents must be affordable to comply with the low and moderate-income housing national objective standard. Howard County has two separate definitions of affordable rents, one for projects funded exclusively with CDBG funds, and one for projects combining CDBG funds with other federal and/or State funding.

For rental projects where CDBG is the only source of federal funds and there are no State funds, affordable rents are defined as rents, excluding the utility allowance, which do not exceed the lesser of the Fair Market Rent, as determined by HUD from time-to-time, or that amount which would be equal to 30 percent of the gross monthly income of a household earning 80 percent of the area median income, adjusted by family size, for the area as defined and published by HUD. In making this determination, it will be assumed that an efficiency unit will be occupied by a single person, a one-bedroom unit by two persons, a two-bedroom unit by three persons, a three-bedroom unit by four persons, and a four-bedroom unit by a five persons household.

For rental projects, utilizing CDBG funds with other federal and/or state funds, affordable rents are defined by the other programs' requirements as long as the project continues to serve persons at or below 80 percent of the area median income. The other programs include but are not limited to HOME, federal Low-Income Housing Tax Credits, housing mortgage revenue bonds, public housing capital funds or public housing operating subsidies, HOPE VI, Project Based Section 8, Section 202 or Section 811 development funds, state rental housing development programs, and other similar government funded programs.

Attachments

Citizen Participation Comments

FFY2021 NEEDS HEARINGS NOTES

DECEMBER 2020

OMB Control No: 2506-0117 (exp. 09/30/2021)

Howard County Community Planning and Grants Division
FFY2021 Annual Action Plan - Needs Hearings
WebEx Conference Calls

Dates & Times of Calls

1. Wednesday, December 2, 20201- 1:00 PM – 3:00 PM
2. Thursday, December 10, 2020 – 10:00 AM – 12 Noon
3. Tuesday, December 15, 2020 – 2:00 PM – 4:00 PM

Framework of Call:

- Organization's background;
- Population(s) served;
- What are some of the housing challenges;
- What are some of the unmet social service needs?

Wednesday, December 02, 2020 Hearing Notes

- No interested participant signed up for this Needs Hearing – no comments or concerns received

Thursday, December 10, 2020 Hearing Notes

Mike Mitchell / FIRN

- FIRN is an organization that serves immigrant in Howard County and beyond.
- As many of you know that about one out of every four residents of this county are foreign born.
- Our challenge that we see right now, there are many immigrants that are in service jobs, so are many people who are not able to meet rent and then also the cost of housing has led to over-crowding of housing. So, if we could find below market rentals that would be a huge help for the population we serve.
- So, I would say that eviction is a challenge and number two is rents that are below the market in the county.
- The other thing that I would say isn't a direct housing need but is related back to housing is financial literacy and access to financial banking services, etc. That is something we exploring, but maybe other organizations on the call already have.
- So those are three things that I would like to bring to attention of this hearing.
- Thank you for the opportunity to participate.

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

Dana Sohr / Bridges to Housing Stability

- I would echo several things that Mike, but first by way of context the ones that Bridges serves on the way of services we are on the Coordinated System of Homeless Services the coordinated system who serve homeless individuals.
- So, we do housing, we help avoid evictions, we do some long-term supportive housing.
- Kim Pace is also on the call and she will describe what she does at Bridges in the program that she is managing
- One additional program at Bridges is the Alliance Program. We own and operate a number of below market rental properties here in Howard County for tenants who earn 30-60% area median income.
- And, I would also echo some of the things that Mike said, evictions, the pending threat, the looming threat of evictions is hanging over the heads of many households. Many household are behind in rent.
- Many have gotten served with the COVID specific CDBG funding that was available earlier this year, the county funding that was released earlier this year. That has been helpful but not everyone is caught up and some people still haven't been reemployed, so pending evictions is certainly a threat.
- Affordability is just such a huge issue. Howard County is such desirable community for people who have the means to purchase homes here.
- And we buy homes and rent them to low income individuals, and we are competing now against people with more money. Often five (5) or six (6) buyers for the same property, so there are bidding wars, so prices are going up.
- So that going to squeeze, that is going to raise rents, that to raise housing cost which will squeeze people even further.
- So those are the big challenges that we see.

Donna Sturdivant / Howard County Housing Commission

- We serve affordable renters and some market rate renters at some Howard County properties.
- And like what Dana and Mike said, of course we do run into the challenges of evictions are how to try to prevent them. And grants this year have helpful, but we don't see COVID ending anytime soon.
- So, as we see our delinquent rents taking leaps and bounds every month we worry about down the road how do we service all these people.
- Another thing that COVID has put the Commission in a very concerning position is the quality of our housing and the upkeep the housing with our revenue being down and the county restrictions with charging certain fees and raising rents that of course drops our revenue.
- Than when it comes to renovations and upkeep in our communities the funding just isn't there and County's Licensing and Permits come out to site the communities with

2

violations, they don't want to hear you don't have the money paint and put in new railings and put in windows. It just has to be done.

- So, this year we are seeing new challenges and wondering if next year if we have capital improvements and things we have to so keep up the properties because we our people to live in quality homes. So when our funds are down it limits our ability to do the things that we should be doing and that we want to do.

Ann Heavner / Rebuilding Together Howard County

- In regards, to populations served, the average of our clients is $30,000 a year. We serve only homeowners that are located in the county. We do not do any work on rental properties or that type of thing.
- Basically, our services include home rehabilitation.
- We also have a handy-man service, we have Urgent Repair, incase anything happens that is an emergency situation, such as the HVAC system goes out and they don't have any heat in the middle of winter. Or a tree falls on their property or on their house and they need a new roof.
- We are also heavily involved with special needs individuals, disabled homeowners, and we are now the go to organization in county for ramps. We have a team of folks who provide grab bar installations and also do a lot of chairlifts.
- In regards to some of the housing challenges we face, our business model is one that relies on volunteers. And, we have 1,000 volunteers that make up teams that go into a house to do this rehabilitation. Because of COVID we had to cancel all of our volunteer teams to include our annual Rebuild Day where we do about 25-30 houses. So instead all of those repairs that were done by volunteer teams that provide us with a fee per house. The volunteer teams were canceled, and we had to do all of those repairs with contractors. I am very proud to say that everyone that was supposed to receive services on Rebuild Day through volunteer teams received them through contractors. That's much more expensive for us to do that is for sure.
- We are seeing more and more calls from the community from people facing evictions.
- In regard to social services we recently partnered with the Department of Community Resources and Services for a grant that is focused on the mobile home communities. And those mobile homes are only supposed to last about twenty-five years and we have 7 mobile home parks in the county and those mobile homes are very, very old and they need a lot of work.
- That is pretty much where we stand at the present time.

Jennifer Dunson / Volunteers of America

- Case Manager at the Leola Dorsey Community Resource Center
- If you don't know about Leola Dorsey, we are permanent housing community located in Jessup.
- We are co-located with the Day Resource Center that is operated by Grassroots.

- We have 35 residents that live at Leola Dorsey, and before coming to Leola Dorsey, these folks were literally and chronically homeless. Meaning that they outside on the streets, in tents or in their cars for long periods of time. Most of them came into Leola Dorsey with physical disabilities, mental illness, and substance abuse disorder issues.
- We operate using the Housing First model, so that means that are looking to provide stable housing first to our residents, and then we work with them to address issues that led to their homelessness, like their mental illness and their substance abuse issues.
- We found that it was very difficult to address these issues during the pandemic because so many of the services are via Telehealth or if they are off site it is very difficult for our clients to get off site anymore.
- Telehealth poses particular difficulty because many of our folks are not exactly computer literate so operating Zoom or WebEx or whatever system is proving to be a challenge for them.
- Since it is difficult for them to get off site during the pandemic, most of them are really suffering with social isolation and depression right now. It is my goal to develop programs that are on site to address some of these issues, such as AA meetings, and NA meetings. Having small group discussions, community building activities, crafts and board games for small groups of people at a time. So, they can do it at a social safe distant manner.
- I believe that if I had the funding to purchase the materials for this it would go a long way to combat the depression and social isolation that folks are feeling.
- Another request that residents have made is they would love to have exercise equipment at our building that they can use. Many of them before the pandemic would utilize local community centers and gyms. I agree that exercising would be a great coping mechanism for them. I would love to be able to encourage that.
- Thank you from considering and that is all I wanted to share.

Bill Emshwiller / Living In Recovery

- I sit on the Board for Living In Recovery of Howard County.
- We serve a population of men and women who are coming out of recovery centers who are going through a structured detox period.
- We offer housing that bridges the gap between coming out of those types of facilities and continuing their recovery measure under controlled conditions until they can go out into public and continue their lives productively.
- We operate three (3) houses, two (2) that are dedicated to men and one (1) to women. We own one (1) house outright.
- Pre-pandemic our challenges had been unfortunately that drug over doses had increased substantially in the county and what we have is a continuing need for additional housing and places to put people who have applied.
- Also, pre-pandemic typically operating procedures were that our rent that we collected from the tenants only covered about 50% of the operating costs of the organization and rest depended on donations and fundraising specifically one major fundraiser we have.

4

- During the pandemic what we have had to do is one, reduce the capacity of who can take in. We have had eliminate two (2) people in a room. So, it has brought down a capability of eighteen (18) beds down to fifteen (15) or fourteen (14) depending on the situation.
- So, it puts the operating expenses, we are more dire need of operating expenses, plus the fundraising that we had postponed that we had planned for the year, which was one (1) dinner and one (1) golf outing. We were able to postpone the golf outing to August, it typically happens in June. We were fortunate enough to get a full field, however the revenue was down. And we had to postpone our fundraising dinner all together.
- So, right now with the lack of revenue coming in from the tenants just our standard operating expenses. The house that specifically own we have to maintain and we have kind of cut back on and trying to bare necessities on that to get by.
- So that is how I see right now. Thank you for the opportunity.

Grace Morris / Heritage Housing Partners Corporation

- I am here, and I can hear everyone. I would echo what Dana S said I think the unmet needs include the lack of dedicated flexible funding sources. As you know the Housing Department does not receive any direct County funding. There needs to a Trust Fund established with a dedicated source of revenues. We also have a lack of affordable land.
- I also agree with Donna about less money coming in but the maintenance requirements staying the same and we now have the mortgage payment at Oakland Place so when people don't pay rent it brings on additional financial challenges for us to pay our bills as well.

Tuesday, December 15, 2020 Hearing Notes

Connie Wise / The United Way of Central MD

- I have employed now for about a month, so I still learning a lot of things.
- The population that we are serving, I am working with the Howard County CARES is helping with rents for people who are owing back rent and could be under eviction status if it was before COVID.
- Some of the housing challenges is that we are some of the tenants that owe quite a bit of funding. It can be anywhere from nine (9) months to one (1) month.
- Unmet community need, I think I will just have to wait on that answer, again I have only been here about a month, so I am still learning.
- I know I was talking to Nkechi yesterday, and I know about at least one (1) tenant who owes about $2,000.00 in back rent and then she has got $2,000.00 in late fees. And trying to figure that out, why that is so high. So that is a challenge.
- Thank you Nkechi.

John Amato / Living In Recovery

- I am on the Board of Directors for LIR. Been serving there for about seven (7) years.

5

- This is my first time participating in one of these events, typically one of our fellow members have held up the charge here. And I know many of you know Joe Wilmott well. Joe is one of founding members of our organization. We started in 2010 and Joe really forged the way in the relationships and partnerships across Howard County. And we have been very grateful to receive the benefit of that partnership over the years. So happy to be here with you.
- Our organization like I said was founded in 2010, and we provide housing to folks in recovery. So, recovery residences is our business. We have three (3) homes in Howard County. Today we manage to a total budget of about $300,000.00, so we are small organization, we have a couple of employees and seven (7) members who are on the Board, who are volunteers.
- The populations that serve are men and women in the early stages of recovery of substance use disorders. Most often our clients come to us from inpatient program facilities. So, some of the challenges that we encounter, many times when folks come to us they a really hard time putting their lives back together.
- There challenges and needs in order to try and pay rent. So rent subsidies are an area that we have gotten support with, in the past, and gives some of our residents time to really focus first and foremost on their recovery when they initially join us and stay with us.
- And I think the other need with us, is just additional housing, we've looked to expand;
- Jumping down to community services area, we really feel we are not touching the number of folks in our area who could really benefit from our services and support and so we have had several initiatives and opportunities to expand but we are always evaluating those opportunities. But the cost of housing in Howard County, as we all know is really high and is very challenging for a program like ours.
- So, I would say those primary two areas and I would also say upkeep and maintenance, we do own one (1) of the properties, I believe through HOME, we acquired that property, several years ag, so we have the need to continually maintain and update that property.

Judi Olinger / iHomes

- I am Vice President at Hamanim and I am also President at iHomes which is a community development organization that develops affordable housing for Howard County residents
- Population served is very low-income adults with disabilities.
- What are some of the housing challenges, I can tell you with some of the projects we have going on COVID has been a real challenge with getting permitting, sub-division and things like that accomplished, and as COVID begins to wain I still think that is going to be an issue the speed in which can get those permits and things like that through, so I am a little bit concerned about that.
- One of the other things that I think is hard to develop is one (1) bedroom units, so finding one-bedroom single room occupancy types of units, the cost of those units versus the rent you will allowed to charge does line, they're not cost effective. But I think there is a huge

need in the disability world for those type of units especially as funding is starting to change on the service side.

- And I don't know where it falls under unmet needs, but transportation continues to be an issue in Howard County for folks, access to transportation.
- And then the other thing that has come that COVID has kind of brought out is the lack of access to Wi/Fi and things like that. So, a lot of our folks with disabilities if they are in their own apartment, that is their only way of connecting with other people is through Zoom and things like that, and we can get tablets as an agency we can get grants to get the technology but not the Wi Fi access, and it is so important and is a big problem for us.
- Just jotted down a few notes and those are the things that kind of came out that is all I have right now.

Kari Staddon / United Way of Central Maryland

- I am with United Way of Central Maryland. I am Director of Strategic Impact and I primarily focus on a project in Howard County we will opening called the Family Life Center, which is early learning childcare center. And we were fortunate enough to get some CDBG funding last year to help assist us with some of the capital costs.
- The population that we serve is what we refer to as the ALICE population, and I am hoping that many might be familiar with that acronym. It stands for "assets limited, income constrained employed. And in lay man terms that means people who struggling to makes ends meet, working one or two jobs maybe. And that really are the individuals and families we focus on trying to help with our programs and resources and other parts of the organization.
- We will really be looking to get additional assistance with the Family Life Center. The center we are putting will be in the Columbia Gateway business park.
- We got several significant stakeholders already signed up to assist us with this, however this is a very big for United Way so we be seeking additional CDBG funding for helping to cover the capital costs associated with opening this new facility. COPT is one of our major partners, Corporate Office Property Trust, will be building us a new shell at the location 7125 Columbia Gateway Drive, however we are still responsible for the build out of the interior, for the playground construction. There are a lot of start-up costs for opening up a new center.
- The one unique thing about this Family Center is we know the population that we serve, we know it is really tough to afford good childcare in this County. We know most families will spend on average on childcare over $22,000 a year. Which is way above the national average. It is really tough for families that are making that much money or are low or moderate-income.
- We will be offering a sliding scale with our tuitions and offering lower rates for those ALICE families, we expect that 50-55% of are families will qualify as low to moderate-income, and we offer the benefit to accept Childcare Vouchers from the State of Maryland. We know that less than half the childcare facilities in Howard

County will accept those childcare vouchers, so it limits the choices these families have to put their kids in good quality childcare. So, we will be accepting childcare vouchers and intentionally seeking out those families.

- One thing that I will say is very difficult for these families, and say I think Judi may have mentioned it, is transportation. While many people will have their own personal transportation to and from this Family Center. And we know that there will families that would benefit from this center, that just don't have their own transportation and would rely on public transportation, and whether or not that public transportation is available to them where they live and get them and their children to that center and then onto where they might work, is a big question mark right now. And my guess is it won't be adequate for many families who really take advantage of this. That is one of the barriers these ALICE families face on a regular basis, whether to get to work, or to get to any other service provider in the county is having to rely of the public transportation options that are available in county.
- So, I think that probably sums up what's important at this time, but we are very grateful for the support of Howard County Government in this initiative and we hope we can count on the county for some additional funding as we move forward. Our projected opening date is December 2021.

Cindy Parr / The Arc of Howard County

- I appreciate the opportunity to speak
- like going not so behind Judi Olinger, because she touched all the highlights and I don't have to be repetitive. I did want to underscore a few things the things that she said
- I am the Executive Director of The Arc of Howard County, and we support adults with disabilities and certainly we run a residential program and the ability to update or renovate properties to maintain safe and secure environments is always very important.
- One of the things I think in light of COVID we probably going to be looking at, I don't know if with CDBG funds would be available, but I think we will have to consider it is how we keep our facilities and our homes safe. And it might be the ability to kill bacteria if you will, electro-static cleaning, enhancements to HVAC systems. Some of those things might be what we be looking at, because I think that is going to be a thing of the future.
- I echo what Judi said about transportation, we certainly still have issues with transportation in community.
- I know in times of COVID our supportive employment program, we are not back up to our numbers of people employed, but we are slowly and hopefully steadily getting back to that, and transportation continues to be an issue for folks that work in the non-traditional hours, after five (pm) and before eight (am), like someone who might have a stock the shelf job or any type of retail that takes place after hours, that has always been difficult.

- Again, echoing what Judi said about technology, we have become extremely dependent on technology in this time of COVID, almost all of our programming has become virtual. Those of us that have day programs, those programs are now run virtually. I know The Arc we are running 5 hours a day of virtual day programming and we are reaching folks that we are supporting in our residential settings and also people who are in other provider's residential settings. And we support whether they are living on their own or living with a loved one in their own home.
- I think we have learned to do a lot of things very differently. If someone was going to ask me a question a year ago if this would happen what would you do it would have been like the world coming to the end, my perspective was from the perspective of service provider. I am just very proud, I am amazing at what we have been able to do in the last nine months to continue to provide a fairly large programming to people with disabilities.
- But in opportunities like this with the County and the CDBG funding it always helps us further enhance what we can do in normal times and even now in the COVID times and I very much appreciate the opportunity to share.

Zo Tum Hmung / Chin Association of Maryland

- Hello, I am the Executive Director of the Chin Association of Maryland, based here in Elkridge
- I serve with the Chin community. Chins are refugees from Burma. Burma is in south-east Asia, bordering to India and China. Burma had been ruled by the army since 1962, and because of their allegiance and because of (unknown word) and because they human rights and religious freedom and the military regime had persecuted the Chin minority group back in Burma, that's why they fled to neighboring countries and the United States government brought them here.
- And many of the Chin in Indiana and Texas, but a few of us are here in Maryland, especially Howard County because we really like Howard County, the people are welcoming and very nice, and the education system is great. That is why as refugees it is not easy to live here, but we are here.
- And the housing in the MIHU has been very useful to us, because the price is lower than the market. And then down-payment assistance is a big, big help for us.
- So, the challenge for us is same as everyone else, COVID-19. We could not community gatherings. We could not do the financial literacy training, we could not attend. The challenge for us is the language barrier, there is no credit system back home, there is no banking system like here. How to build credit score, we don't have that back home. And refugees when they left, they left everything. And most of the refugees, apparently didn't even pass high school, they don't even know how to type. And the language barrier, that is why COVID is huge challenging
- Unmet community need, many in the community would really like to buy an MIHU houses, so, I keep asking Faith and Quanita, do have any housing, I keep asking. The good thing is that even though we have had this COVID we have been able to purchase

two (2) properties one (1) in Hanover, and one (1) in Elkridge. So, the community was able to purchase two (2) properties and now we are working on one (1) more property. Quanita I think we are going do the closing, either today or tomorrow, I'm not sure yet.

- And we are also able do either one (1) or two (2) properties, so we are very grateful for MIHUs and all of you (county).
- And, again, the challenge is the financial literacy training. We went through the training last week and we got, I and the community coordinator, so we will try to do the training on-line. I think financial literacy is the big challenge for us and now with this on-line training with the Zoom has been a positive impact on the community, no one like the COVID-19 but there is positive impact you might be very surprised blessing for the refugee community because now we learn how to use the computer. We learn not just how to use Zoom, but we learn how to have a meeting like this on Zoom. So, no one like COVID-19, but out of a bad situation we have learned how to trainings like this. Once the COVID is over we will do more and more activities. So, we are excited, and we are hearing the vaccine, everyone is discussing when the vaccine is going to arrive
- Again, financial literacy training is a big challenge and I think we are moving in the right direction. And a few of our community have moved out, we don't want them to move out of Howard County to Indiana. Because Annapolis Housing Authority is more affordable, even my relatives moved out, but that is their choice. We are very happy.

Tiffany Jordan / Springboard

- I am the Director of Client Services at Springboard here in Howard County; I am relatively new to the agency as well.
- Our populations that we serve, we really serve a wide variety, transitional aged youth, we assist homeless populations. The age spectrum runs the entire gamut starting around the age five (5) or so.
- Some of the housing challenges I have seen since taking on this role is the disparity between the income and the cost of living in Howard County, I guess the ALICE population that really present that even assistance is provided if we can help, how effective is that if your rent or your mortgage is $3,000.00 and you still don't know if you will have employment next month.
- Some of the barriers that I know we really struggle with in the very short time that I have been here is how to meet that short term immediate need and how to work with family long term to increase their ability to come out of some of these challenges. But they present significantly behind, a lot of people coming don't have a lot of knowledge about resources because what I am seeing is a lot of the people are saying this is my first time having to do something like this. So, then you have the barriers of the knowledge of system as well the impact of COVID and trying to provide services effectively but ensure that the consumer and the staff can feel and stay safe is very difficult.
- But that is where we are in terms of my agency and I am really forward to working toward decreasing some of those issues that we have.

Del Scruggs / Community Action Council of Howard County

- I jump on late, but I am glad we still in introductions. It is always a joy to work with Nkechi and Elizabeth. In all of my year of working in grants, which is about 22 years, you two are about the most delightful people from a funders perspective.
- CAC has been providing housing services for quite a while, we provide food through our Howard County Food Bank that we operate, as well as energy programs, and we provide Head Start Programming in Howard County, early child education.
- So those are the main areas, and with the housing we have the regular CDBG, we have the COVID funding and MHU also. I would like to say the COVID funding from CDBG has allowed us to serve the ALICE population. Since we have had the COVID funding we have processed successfully 173 applications reaching 430+ individuals in households.
- And the challenges of COVID of course have already been discussed by other people, with regard to the pandemic we have supplied all our client facing case managers with laptops, so they can work at home as well as in the office. And certainly, the COVID-19 crisis has revealed a lot. There are a lot of lessons being learned. I am checking to see if Housing Director, Elizabeth Stein is going to join us, because I am the Grants Manager. She actually runs all of our housing programs and I am trying to get her on.
- Thank you for letting me share.

Barbara Coleman / Maryland Legal Aid

- I am with Maryland Legal Aid. The population we serve is low-income and a vulnerable population including seniors in there, which I include myself.
- Some of the housing challenges that we are experiencing right now is evictions and lack of funds for the clients.
- So, when it comes to unmet needs affordable housing, IT, transportation, it's a lot that we need. And its' not like we are not working for it but we still need it.
- I think with the affordable housing, I with the young lady who talked about the one-room units for clients, that is needed also for some of our homeless populations because they really can't afford a one-bedroom unit at $1,600.00 or $1,700.00 a month when they are on SSI getting less than $800.00. So, we have some serious problems. We will get some money to do it.

Liz Burrage / The Arc of Howard County

- I am just going to echo what Cindy said. That is it.

FFY2021 ANNUAL ACTION PLAN

TIMELINE

OMB Control No: 2506-0117 (exp. 09/30/2021)

FFY21 ACTION PLAN TIMELINE
Updated October 02, 2020

DATE	ACTION ITEM
NOVEMBER 2020	
Thursday, November 12, 2020	Email Public Notice/Notice of Public Hearing # 1 to Newspapers
Thursday, November 12, 2020	Email Compliance Officer Public Notice for Hearing # 1 Posting to Web-page
Thursday, November 19, 2020	*Publish and Post to Web-page* **Public Notice/Notice of *Virtual* Public Needs Hearings**
DECEMBER 2020	
Wednesday, December 2, 2020	**1:00 PM – 3:00 PM *Virtual* Needs Hearing**
Thursday, December 10, 2020	**10:00 AM – 12:00 PM *Virtual* Needs Hearing**
Thursday, December 10, 2020	Email Public Notice/Notice of Public Hearing # 2 to Newspapers
Thursday, December 10, 2020	Email Compliance Officer Public Notice for Hearing # 2 Posting to Web-page
Tuesday, December 15, 2020	**2:00 PM – 4:00 PM *Virtual* Needs Hearing**
December 17, 2020	*Publish and Post to Web-page* **Public Notice/Notice of Public Needs Hearing #2 (Public Meeting)**
JANUARY 2021	
Monday, January 4, 2021	Email Compliance Officer CDBG & HOME Program Applications for Web-page
Thursday, January 7, 2021	**1:30 PM Virtual Public Needs Hearing #2 (Public Meeting)** *Distribute RFP's and Post RFP to Web-Page*
FEBRUARY 2021	
Monday, February 1, 2021	**RFP Submission Deadline (3:30 pm)**
Thursday, February 18, 2021	Email Public Notice/Notice of Public Comment Period # 3 to Newspapers
Thursday, February 18, 2021	Email Compliance Officer Public Notice for Hearing # 3 Posting to Web-page
Friday, February 19, 2021	***Draft Action Plan Complete***
Monday, February 22, 2021	**30-Day Public Comment Period - *Begins***
Thursday, February 25, 2021	*Publish and Post to Web-Page* **Public Notice/Notice of Public Meeting For Public Comment Period** ***Written or Email***

OMB Control No: 2506-0117 (exp. 09/30/2021)

MARCH 2021	
Friday, March 12, 2021	**Draft copy of AAP and Written Testimony from Director Cimino to Jen Sager**
Thursday, March 18, 2021	Email Compliance Officer Public Notice for Hearings # 4 & # 5 for Posting to Web-page
Thursday, March 18, 2021	Email Public Notice/Notice of Public Hearings # 4 & # 5 to Newspapers
Wednesday, March 24, 2021	**30-Day Public Comment Period – *Ends at 11:59.99 PM***
Thursday, March 25, 2021	**Pre-File Date – Resolution and FFY19 AAP is submitted to Council**
Thursday, March 25, 2021	*Publish and Post to Web-Page* **Public Notice/Notice of Public Hearings Council & Housing Board Hearings #4 & #5**
APRI 2021	
April 5, 2021	**Draft Resolution is Introduced to Council**
April 8, 2021	**Public Hearing #4 for County Resolution Process (Housing Board Meeting)**
Monday, April 19, 2021	**Public Hearing at County Council / Public Hearing #5 for County Resolution Process (Director Cimino to Testify)**
MAY 2021	
Monday, May 3, 2021	**County Council Vote**
Friday, May 14, 2021	Final Edits Complete / Submit to HUD
Monday, May 17, 2021	**Final Action Plan due to HUD**

OMB Control No: 2506-0117 (exp. 09/30/2021)

FFY2021 VIRTUAL NEEDS HEARINGS

DECEMBER 2020

OMB Control No: 2506-0117 (exp. 09/30/2021)

PUBLIC NOTICE/NOTICE OF VIRTUAL PUBLIC HEARINGS

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

November 19, 2020

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are encouraged to participate in one of these Public Needs Hearings which will explain any changes to the FFY21 Applications for both CDBG and HOME funding.

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

1. Wednesday, December 02, 2020 – 1:00 PM – 3:00 PM
2. Thursday, December 10, 2020 – 10:00 AM – 12 Noon
3. Tuesday, December 15, 2020 – 2:00 PM – 4:00 PM

Once you've decided which date and time work for you, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the corresponding meeting.

If you cannot attend the Public Hearing or would like additional information regarding the development of the FFY2021 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Department of Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6814583

Printed: 11/13/2020 8:44:43 AM

Page 1 of 3

* Agency Commission not included

GROSS PRICE * : **$235.83**

PACKAGE NAME: CNG Howard County Times Single

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6814583

Printed: 11/13/2020 8:44:43 AM

Page 2 of 3

* Agency Commission not included

GROSS PRICE * : **$235.83**

PACKAGE NAME: CNG Howard County Times Single

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

AdSize(s): 2 Column (8TAB), 1 Column (8TAB)

Run Date(s): Thursday, November 19, 2020

Color Spec. B/W

Preview

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6814583

Printed: 11/13/2020 8:44:43 AM

Page 3 of 3

* Agency Commission not included

GROSS PRICE * : **$235.83**

PACKAGE NAME: CNG Howard County Times Single

PUBLIC NOTICE/NOTICE OF VIRTUAL PUBLIC HEARINGS

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

November 19, 2020

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are encouraged to participate in one of these Public Needs Hearings which will explain any changes to the FFY21 Applications for both CDBG and HOME funding.

Below is a list of meeting dates and times that each WebEX will be held.
1. Wednesday, December 02, 2020 – 1:00 PM – 3:00 PM
2. Thursday, December 10, 2020 – 10:00 AM – 12 Noon
3. Tuesday, December 15, 2020 – 2:00 PM – 4:00 PM
Once you've decided which date and time work for you, please email Ms. Quanita Karseem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the corresponding meeting.

If you cannot attend the Public Hearing or would like additional information regarding the development of the FFY2021 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Department of Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.
11/19/2020 6814583

Meadows, Elizabeth

From: Dumas, Ronnita <rdumas@tribpub.com>
Sent: Friday, November 13, 2020 10:52 AM
To: Meadows, Elizabeth
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: Public Notice

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

I went ahead and submitted your legal notice, **6814551, 6814583**, for publication. Your account, **CU00168892**, has been invoiced. You will receive your affidavit via mail to address on file within 7-10 business days after the final run date.

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

Have a great day!

Ronnita Dumas
Inbound Advertising Representative

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

Baltimore Sun, 410-559-7700 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581

Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4730 • *Hartford Courant*, 860-525-2626

Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160

Sun Sentinel, 800-260-2000 • *Tidewater Review*, 757-253-8126 • *Virginia Gazette*, 757-253-8126

Virginian-Pilot, 757-622-1455

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Friday, November 13, 2020 9:16 AM
To: Dumas, Ronnita <rdumas@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: Public Notice

Caution: External Sender

Hi Ronnita;

Both of these proofs look good. They are approved for publication.

Thanks very much, Elizabeth

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

Meadows, Elizabeth

From: Meadows, Elizabeth
Sent: Friday, November 13, 2020 10:16 AM
To: 'Dumas, Ronnita'
Cc: Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject: RE: Public Notice

Hi Ronnita;

Both of these proofs look good. They are approved for publication.

Thanks very much, Elizabeth

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

From: Dumas, Ronnita <rdumas@tribpub.com>
Sent: Friday, November 13, 2020 10:06 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: RE: Public Notice

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

Attached are the new proofs
The price for 6814551 was incorrect it did not have the Columbia Flyer price included. The corrected price is $178.61

Ronnita Dumas
Inbound Advertising Representative

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

Baltimore Sun, 410-539-7700 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581

Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525

Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160

Sun Sentinel, 800-250-2300 • *Tidewater Review*, 757-203-8126 • *Virginia Gazette*, 757-253-8123

Virginian-Pilot, 757-622-1455

1

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Thursday, November 12, 2020 2:10 PM
To: Dumas, Ronnita <rdumas@tribpub.com>
Subject: RE: Public Notice

Caution: External Sender

Hi Ronnita:

It is the 6814583 PDF which the 200KB of data. Does that help you?

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

From: Dumas, Ronnita <rdumas@tribpub.com>
Sent: Thursday, November 12, 2020 2:56 PM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: RE: Public Notice

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

which notice need to be fixed?

Ronnita Dumas
Inbound Advertising Representative

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

Baltimore Sun, 410-539-7700 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581

Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525

Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160

Sun Sentinel, 800-250-2000 • *Tidewater Review*, 757-253-6128 • *Virginia Gazette*, 757-253-6126

Virginian-Pilot, 757-622-1456

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Thursday, November 12, 2020 10:58 AM
To: Dumas, Ronnita <rdumas@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <tfwall@howardcountymd.gov>;

2

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

Caution: External Sender

Hi Ronnita:

I found a mistake I missed in one of the Notices I emailed previously. Please see attached Notice with the corrected information.

The COVID-19 CAPER Notice was good.

Thanks, Elizabeth

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

From: Dumas, Ronnita <rdumas@tribpub.com>
Sent: Thursday, November 12, 2020 11:43 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: Public Notice

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

Good morning,

Thank you for your legal notice request.

A ***proof*** is attached for your review and approval. *Please carefully review the proof to ensure that all text is accurate for publication.* Your response is needed by ***Tuesday 11/17 before the 12 pm*** deadline to ensure the notice is printed on ***Thursday 11/19*** in the ***Howard County Times***. If approved, I can invoice the account **CU00168892** for the amount of ***$123.39, $248.10***

Ad number for reference: **6814551, 6814583**

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

Ronnita Dumas
Inbound Advertising Representative

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

3

Baltimore Sun, 410-539-7700 • *Capital Gazette*, 410-268-7200 • *Carroll County Times*, 410-857-5581

Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525

Morning Call, 610-820-6555 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160

Sun Sentinel, 800-238-2000 • *Tidewater Review*, 757-253-8126 • *Virginia Gazette*, 757-253-8126

Virginian-Pilot, 757-622-1455

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Thursday, November 12, 2020 9:49 AM
To: Harris, Ellen <ceharris@baltsun.com>; Welenc, Charlie <cwelenc@tribpub.com>; PPCLegals-1 <legals@patuxent.com>; cnglegal@tribc.com <cnglegal@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Delk, Tracy <tdelk@howardcountymd.gov>
Subject: Public Notice

Caution: External Sender

Good Morning;

Customer # CU00168892

Please publish the attached Public Notice in the **November 19, 2020** issues of the Howard County Times and Columbia Flier.

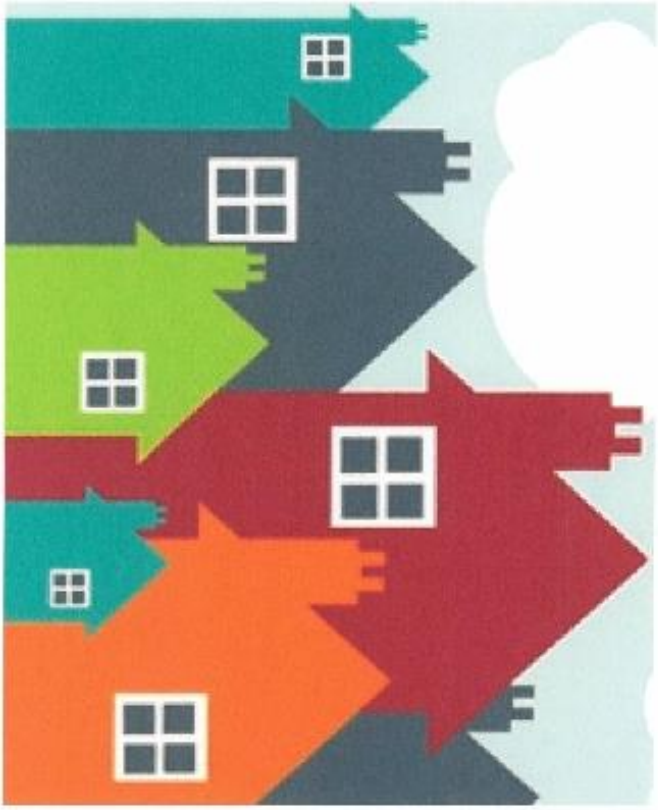
The notice only needs to run 1 time and I will need a legal certification follow the publication. Can you please confirm back to me that you have received this request and it will be processed?

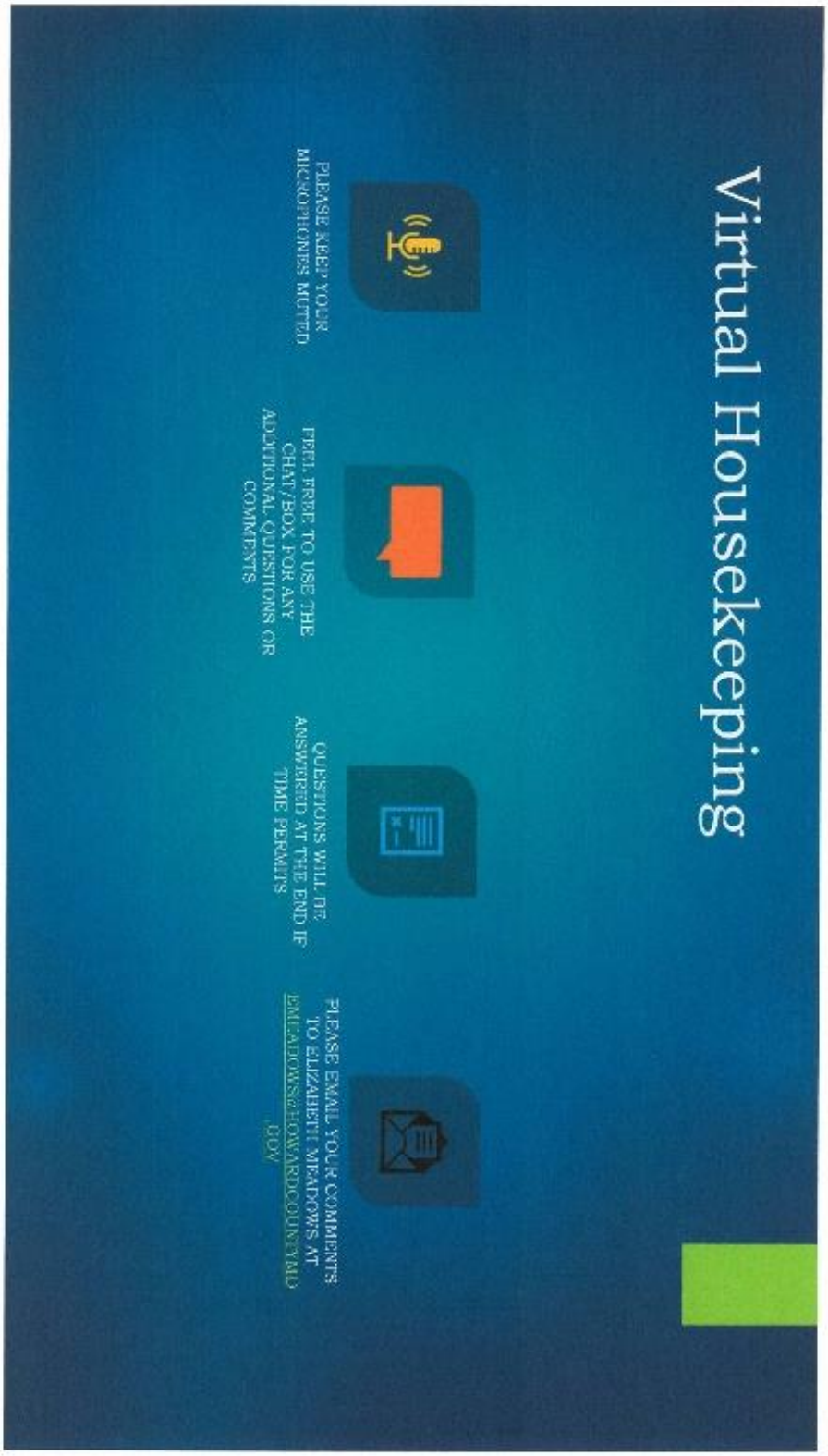
Thanks very much. Elizabeth

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

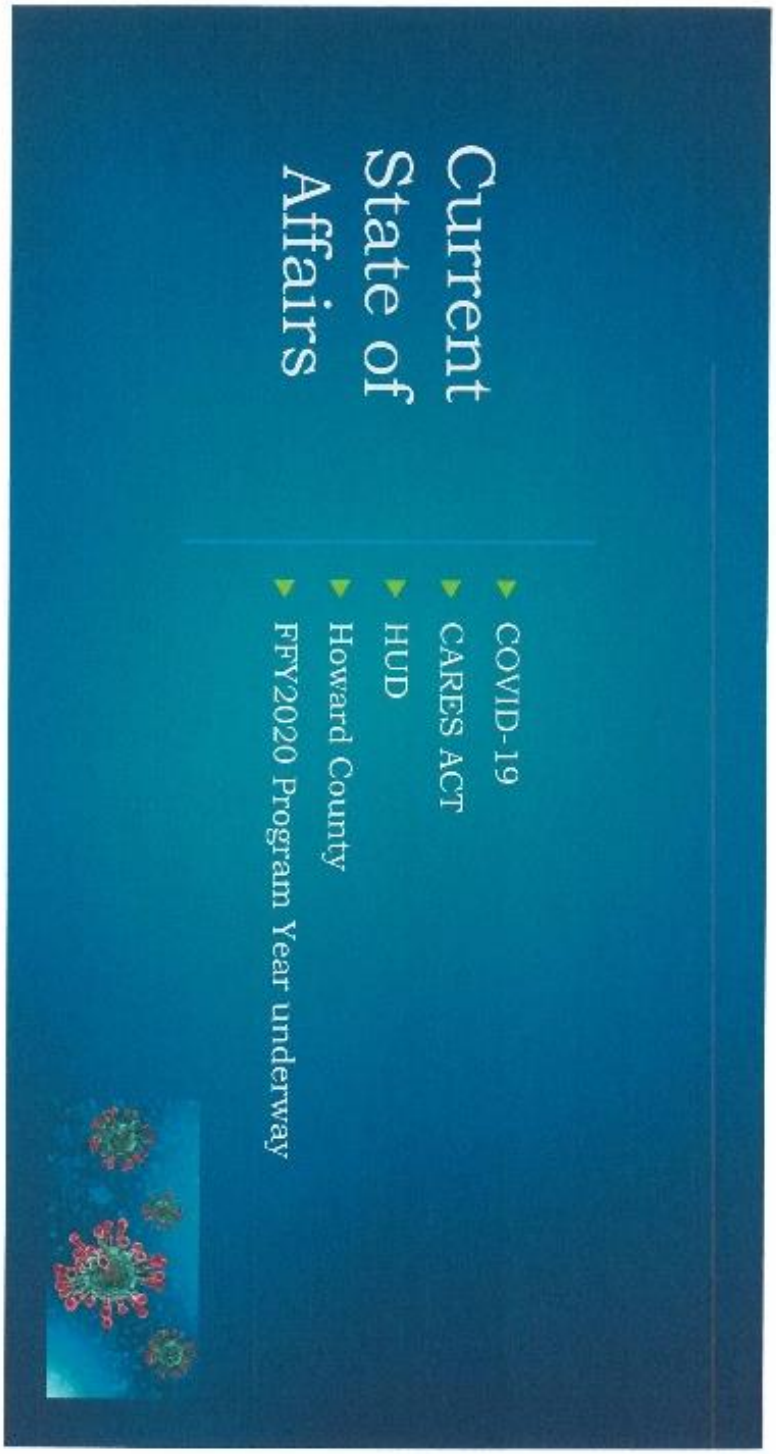
4

FFY2021 Annual Action Plan
Virtual Needs Hearing #1
Tuesday 15th December, 2020
2:00 – 4:00 pm





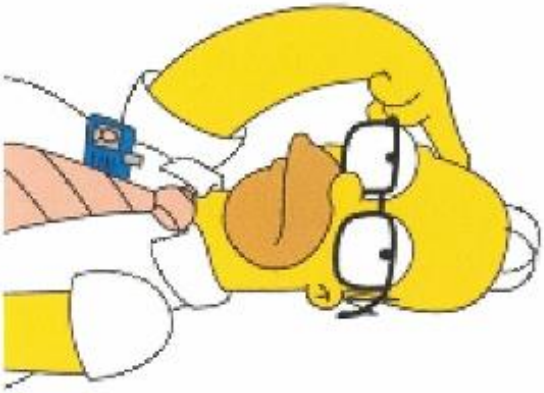
OMB Control No: 2506-0117 (exp. 09/30/2021)



OMB Control No: 2506-0117 (exp. 09/30/2021)

Acronyms

- CFR- Code of Federal Regulations
- CDBG- Community Development Block Grant
- HOME- Home Investment Partnership Program
- HUD- Department of Housing and Urban Development
- DHCD- Howard County's Department of Housing and Community Development



OMB Control No: 2506-0117 (exp. 09/30/2021)

Why are we here today?

- 24 CFR 91.220- Action Plan
- (b) –A concise executive summary that includes the objectives and outcomes identified in the plan as well as an evaluation of past performance, a summary of the ***citizen participation and consultation process*** , ***a summary of comments or views***, and a summary or comments or reviews not accepted and the reasons therefore (24 CFR 91.105(b)(5)).

Howard County's Allocations

- FFY2019 - $1.2M (CDBG) & $422K (HOME)
- FFY2020 - $1.3 M (CDBG) & $465K (HOME)
- FFY2021 -(Proposed)- $1.3 M (CDBG) & $465K (HOME)

OMB Control No: 2506-0117 (exp. 09/30/2021)

FFY2019 Outcomes: CDBG & HOME Activities

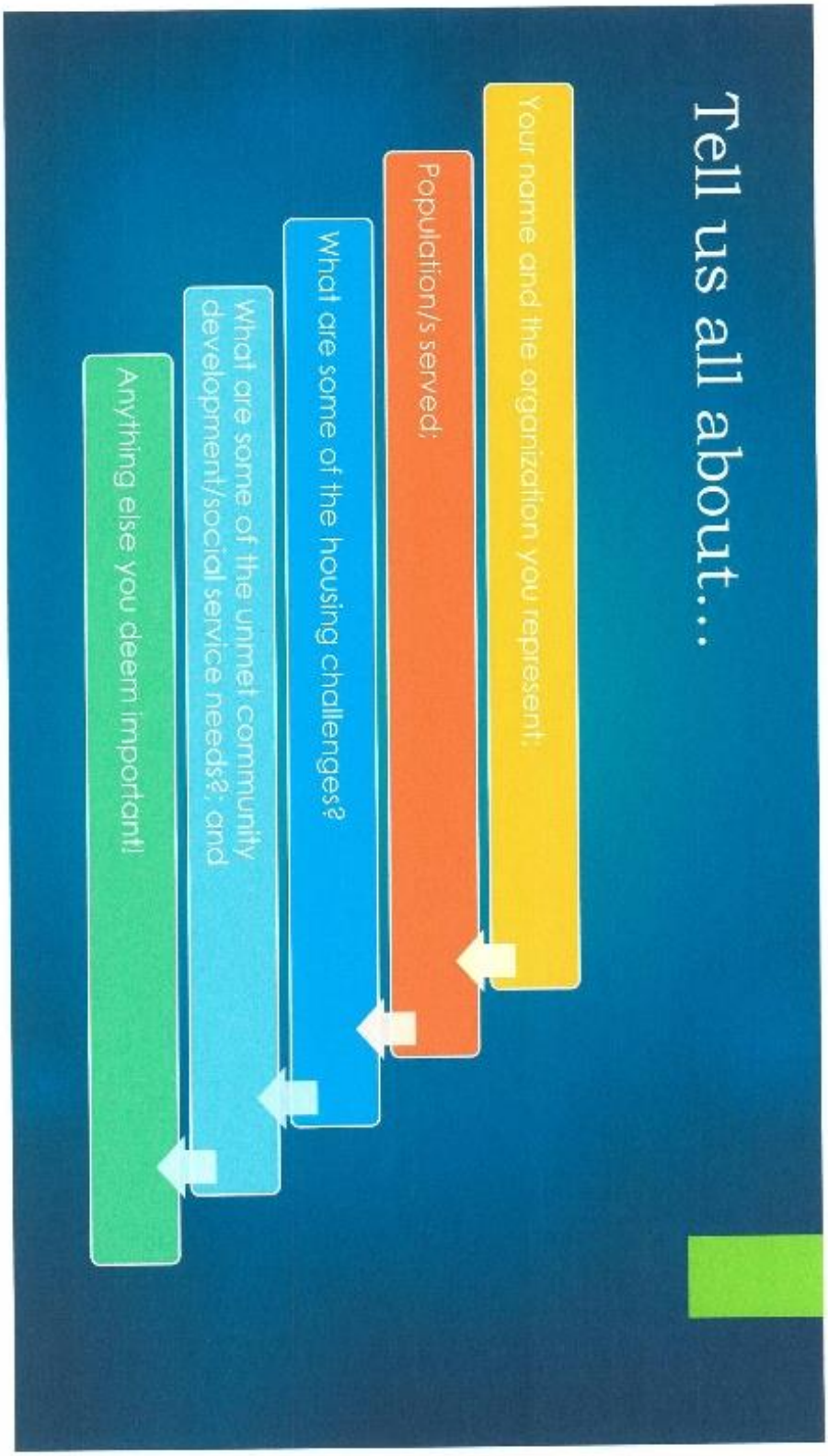
- Renter Occupied Rehabilitation – 21 Households;
- Special Needs Housing Acquisition- 5 SRO units;
- Special Needs Housing Rehabilitation- 2 Households;
- Homebuyer Assistance- 5 Households;
- Public Service Activities-
  - 290 persons diverted homelessness;
  - 105 homeless individuals received critical social and supportive services; and
  - 101 victims of domestic violence/human tracking were provided safe shelter.

OMB Control No: 2506-0117 (exp. 09/30/2021)

What we hope to accomplish today!

- Encourage open dialogue with all attendees;
- Discuss the needs of your organization while serving clients;
- Discuss what impacts your organization's ability to serve low/moderate income clients; and
- Discuss some of the obstacles to affordable housing and community development services.

OMB Control No: 2506-0117 (exp. 09/30/2021)



OMB Control No: 2506-0117 (exp. 09/30/2021)

Next Up

- Join us on January 07, 2021 for the second Virtual Needs Hearing;
- The release of the Request for Proposals (RFP);
- Grant specific information;
- Application details; and
- An EventBrite invitation is forthcoming!

THANK YOU !!!

Meadows, Elizabeth

From:	Animashaun, Nkechi
Sent:	Wednesday, December 9, 2020 2:47 PM
Cc:	Meadows, Elizabeth
Subject:	Reminder- FFY2021 Upcoming Virtual Needs Hearing

Greetings!

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies, and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and County funded Fee-in-Lieu grant programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG, HOME, and County-funded programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation, and public service opportunities. Organizations that intend to apply for funding are strongly encouraged to participate in one of these Public Needs Hearings.

Please click the link below to register for NEXT TUESDAY's virtual meeting, which will be held at 2:00 pm. After you've registered, you will receive a link to the WebEx meeting.

**If you have already registered for either one of the virtual meetings, please disregard this email.

https://www.eventbrite.com/e/ffy2021-virtual-needs-hearing-1-tickets-131353833853

Kind Regards,

Nkechi M. Animashaun, Home Program Specialist
Community Planning & Grants Management
HOWARD COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
6751 Columbia Gateway Drive – 3rd Floor
Columbia, MD 21046
Direct Dial: 410-313-3693
Fax No.: 410-313-5960
nanimashaun@howardcountymd.gov

This email transmission may contain CONFIDENTIAL and PRIVILEGED information. If you are not the intended recipient, please notify the sender by email, do not disseminate and delete immediately.

1

2

Meadows, Elizabeth

From: Animashaun, Nkechi
Sent: Friday, December 4, 2020 1:10 PM
Cc: Meadows, Elizabeth
Subject: FFY2021 Virtual Needs Hearing Invitation- Reminder

Greetings!

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies, and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and County funded Fee-in-Lieu grant programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG, HOME, and County-funded programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation, and public service opportunities. Organizations that intend to apply for funding are strongly encouraged to participate in one of these Public Needs Hearings.

Please click on the link below to register. After you've registered, you will receive a link to the WebEx meeting on the date and time you've chosen.

https://www.eventbrite.com/e/ffy2021-virtual-needs-hearing-1-tickets-131353833853

FFY2021 Virtual Needs Hearing #1

Virtual Needs Hearings for FFY2021

www.eventbrite.com

Thank you for your consideration and participation.

Kind Regards,

Nkechi M. Animashaun, Home Program Specialist

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

Community Planning & Grants Management
HOWARD COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
6751 Columbia Gateway Drive – 3rd Floor
Columbia, MD 21046
Direct Dial: 410-313-3693
Fax No.: 410-313-5960
nanimashaun@howardcountymd.gov

This email transmission may contain CONFIDENTIAL and PRIVILEGED information. If you are not the intended recipient, please notify the sender by email, do not disseminate and delete immediately.

2

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Tuesday, December 1, 2020 11:14 AM
To:	Kareem, Quanita; Animashaun, Nkechi
Subject:	RE: Question about December 2nd Needs Hearing
Attachments:	FFy2021 AAP Virtual Needs Hearings Invitation for Nonprofit List.docx; FFY2021 AAP Virtual Needs Hearings Agenda.docx

Hi Ladies:

Since we have no one indicated they wanted to participate in tomorrow's session, I think it is fine to cancel. We will still have two opportunities to get comments for our Action Plan development. I have updated and attached the Invitation for the Nonprofit List and the Agenda we will use during Virtual Needs Hearings. These sessions will keep us on track to get any comments we will needs.

Thanks very much, Elizabeth

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

From: Kareem, Quanita
Sent: Tuesday, December 1, 2020 10:58 AM
To: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: RE: Question about December 2nd Needs Hearing

I believe you can make Eventbrite require an email address? If so, just do it on there and say, they will receive a "WebEx Invitation". Then you can send me the list.

So what do we do for tomorrow (cancel or keep)? I will set the meeting up and it will be logged on as early as 11:30 (lots of quiet recording time) because I have an appointment at 12 and won't be sitting at my computer.

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
Direct Dial: 410-313-3386
gkareem@howardcountymd.gov

From: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Sent: Tuesday, December 1, 2020 10:26 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>; Kareem, Quanita <qkareem@howardcountymd.gov>
Subject: Re: Question about December 2nd Needs Hearing

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

Good morning,

Thanks for the update. Instead of doing Eventbrite, would I be able to send a WebEx invitation and manage the registration, to not overburden you?
I think Eventbrite worked well when we had in-person hearings. I could log in and determine who signed up etc.

Or do I do the Eventbrite and have them reach out to you to register for the date and time they can attend.

Let me know what you all think works best, and simplest.

Kind Regards,
Nkechi

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Tuesday, December 1, 2020 10:00 AM
To: Kareem, Quanita <qkareem@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: RE: Question about December 2nd Needs Hearing

Hi Quanita;

Thanks for checking. We will send out an invitation for the remaining 2 hearing through Event Bright to try and engage some participation.

Kind Regards, Elizabeth

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

From: Kareem, Quanita
Sent: Tuesday, December 1, 2020 9:29 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: RE: Question about December 2nd Needs Hearing

Good Morning Elizabeth

I just went through all my emails and no one has requested to register for tomorrow.

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
Direct Dial: 410-313-3386

2

qkareem@howardcountymd.gov

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Tuesday, December 1, 2020 8:17 AM
To: Kareem, Quanita <qkareem@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Subject: Question about December 2nd Needs Hearing

Hi Quanita;

I hope you had a wonderful holiday with your family!

I have a question regarding tomorrow's, December 2nd, Virtual Needs Hearing. Based upon the notification being on our webpage and in the newspapers, have you had anyone wanting to participate in the Virtual Needs Hearing?

Thanks very much, Elizabeth

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

3

Webpage

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are encouraged to participate in one of these Public Needs Hearings which will explain any changes to the FFY21 Applications for both CDBG and HOME funding.

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

1. Thursday, December 10, 2020 – 10:00 AM – 12 Noon
2. Tuesday, December 15, 2020 – 2:00 PM – 4:00 PM

Once you've decided which date and time work for you, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the corresponding meeting.

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

Kind Regards,

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

Community Planning and Grants

What are our Grants?

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

FFY 2019 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

FFY 2021 AAP NEEDS HEARING

PUBLIC NOTICE/NOTICE OF VIRTUAL PUBLIC HEARINGS

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in one of our Virtual Public Needs Hearings regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Annual Action Plan, which supports the Approved FFY2020 – FFY2024 Consolidated Plan, is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG program and the HOME program. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

The CDBG and HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities intended to principally benefit low- and moderate-income residents. Activities may include, but are not limited to, housing rehabilitation, homeownership assistance, economic development, public facility acquisition or rehabilitation and public service opportunities. Organizations that intend to apply for funding are encouraged to participate in one of these Public Needs Hearings which will explain any changes to the FFY21 Applications for both CDBG and HOME funding.

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

1. Wednesday, December 02, 2020 – 1:00 PM – 3:00 PM
2. Thursday, December 10, 2020 – 10:00 AM – 12 Noon
3. Tuesday, December 15, 2020 – 2:00 PM – 4:00 PM

Please pick one date and email Ms. Quanita Kareem at qkareem@howardcountymd.gov to register.

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

HOWARD COUNTY FFY2019 SUBSTANTIAL AMENDMENT

COVID-19 CDBG NEEDS HEARING INVITATION

CARES ACT CDBG-CV - Round 2 Application

FFY2020 – FFY2024 CONSOLIDATED PLAN

Public Notice and Notice of Public Comment Period

EVENTS

COVID 19 CDBG Update

CDBG-CV FFY2019 SUBSTANTIAL AMENDMENT

HOME Program Policy Guide

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

Follow us

Menu

Home

I Want To

Services

Departments

News

Events & Meetings

Stay In Touch

About HoCo

Emergency Management

County Executive

County Council

Careers

Gallery

Visit Howard County Government Flickr

Copyright 2020 by Howard County, Maryland | Sitemap | Privacy Statement | Terms Of Use | ADA Notice

FFY2021 AAP NEEDS HEARINGS # 2

RFP SESSION - JANUARY 2021

OMB Control No: 2506-0117 (exp. 09/30/2021)

PUBLIC NOTICE/NOTICE OFVIRTUAL PUBLIC HEARING

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

December 17, 2020

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in a Virtual Public Hearing regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

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

Below is the meeting date and time for the WebEx meeting:

- **Thursday, January 7, 2021 at 1:30 PM**

To participate in Needs Hearing Meeting, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov, also copied on this email, to receive the WebEx link and code for the meeting.

Applications for funding will be available immediately following the meeting. The application will also be available at the Howard County Housing administrative office at the address noted below and on the County's web page at www.howardcountymd.gov. **The Application submission deadline is Monday, February 01, 2021 at 3:30 pm.**

If you cannot attend the meeting or would like additional information regarding the development of the FFY2021 Annual Action Plan, please contact Elizabeth Meadows, Chief, Community Development and Grants, at 410-313-6324, or email emeadows@howardcountymd.gov or visit the Howard County Housing office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

THE BALTIMORE SUN MEDIA GROUP

300 E. Cromwell Street
Baltimore, Maryland 21230
tel: 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 6836198

Sold To:
Howard County Dept of Housing - CU00168892
9820 Patuxent Woods Drive #224
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
9820 Patuxent Woods Drive #224
Columbia,MD 21046

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

Dec 17, 2020

The Baltimore Sun Media Group
B. Price, Legal Advertising
By _____

PUBLIC NONCENSORIOUS OPPORTUNITY PUBLIC HEARING
Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046
December 17, 2020

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non profit organizations to the Public Hearing regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FY2021 Annual Action Plan.

The action plan is the County's yearly application that details Howard County and its partners' use of funds for affordable housing and community development activities directed to primarily benefit low to moderate-income residents. Activities may include but are not limited to housing rehabilitation, homeownership assistance, economic development, public facility and infrastructure improvements, public service objectives. Organizations that intend to apply for funding are required to participate in this public hearing, which will include a brief presentation on eligible activities.

Please take notice that the following date and time for the public hearing:

• Thursday, January 7, 2021 at 1:30 PM

To participate in Virtual Hearing Meeting, please email housing@howardcountymd.gov to receive the Webex link and code for the hearing.

Applications for funding will be available immediately following the hearing. The application will also be available at the Howard County Housing administrative office at the address noted above and on the County's web page at www.howardcountymd.gov. The Application submission deadline is Monday, February 01, 2021 at 2:00 pm.

If you cannot attend the meeting or would like additional information regarding the development of the FY2021 Annual Community Development Plan please contact Elizabeth Mecklenburg, chief, email dcmecklenburg@howardcountymd.gov or visit the Housing and Community Development office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.
12/17/2020-6835198

THE BALTIMORE SUN MEDIA GROUP

300 E. Cromwell Street
Baltimore, Maryland 21230
tel 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 6836198

Sold To:
Howard County Dept of Housing - CU00168892
9820 Patuxent Woods Drive #224
Columbia,MD 21046

Bill To:
Howard County Dept of Housing - CU00168892
9820 Patuxent Woods Drive #224
Columbia,MD 21046

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

Dec 17, 2020

The Baltimore Sun Media Group

B. Price, Legal Advertising

By _____

PUBLIC NOTICE/NOTICE OF VIRTUAL PUBLIC HEARING
Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046
December 17, 2020

To Howard County Department of Housing and Community Development residents, all housing providers, community organizations, and other interested organizations or persons:

Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs and the development of the FY 2021 Annual Action Plan

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funds under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1,360,548.00 in CDBG funds and $665,943.00 in HOME funds for the FY 2021 Program Year.

The Consolidated HOME programs provide funds that enable Howard County and local organizations to carry out a variety of housing and community development activities in order to particularly benefit low to moderate-income residents. Activities may include but are not limited to housing development, rehabilitation, homeownership assistance, economic development, and facility improvements. Organizations that intend to apply for funding are required to post notices in the public facility which will include a brief description of the public review.

Below is the agenda date and time for the Virtual Hearing:

• Thursday, January 7, 2021 at 1:30 PM

To participate in Virtual Hearing please email Michelle Kimball at mkimball@howardcountymd.gov to receive the Webex link and code for the meeting.

Applications for funding will be available on the website at the meeting. The application will also be available at the Howard County Housing Commission office at 6751 Minstrel Way, Suite 200, Columbia, MD 21045 and on the County's web page at www.howardcountymd.gov/housing. The Application deadline will be Monday, February 01, 2021 at 2:30 pm.

If you cannot attend the meeting or would like additional information regarding the development of the Annual Action Plan, please contact Michelle Kimball at 410-313-7307 (Housing Community Development and Grants, at 410-313-7308, or email mkimball@howardcountymd.gov) or visit the Howard County Housing Office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046.

12/17/2020 6836198

Meadows, Elizabeth

From:	O'Connor, Colleen Ann <co@tribpub.com>
Sent:	Tuesday, December 15, 2020 9:04 AM
To:	Meadows, Elizabeth
Cc:	Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject:	RE: Public Notice

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

Good morning!

I have submitted your ad **6836198**, for publication. Your account **CU00168892** has been invoiced. You will typically receive your affidavit about 7-10 business days after the final date of publication.**

If you need anything further, please let me know!

Have a lovely day,

Colleen O'Connor
Inbound Advertising Representative

Baltimore Sun, 410-538-7790 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581
Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525
Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160
Sun Sentinel, 800-250-2300 • *Tidewater Review*, 757-253-8126 • *Virginia Gazette*, 757-253-8126
Virginian-Pilot, 757-622-1455

TRIBUNE PUBLISHING
the results group

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

*****Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.***

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Thursday, December 10, 2020 12:04 PM
To: O'Connor, Colleen Ann <co@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: Public Notice

Caution: External Sender
Hi Colleen:

1

This proof looks good. It is approved to print.

Thanks. Elizabeth

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

From: O'Connor, Colleen Ann <co@tribpub.com>
Sent: Thursday, December 10, 2020 11:43 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <tfwall@howardcountymd.gov>; Delk, Tracy <tdelk@howardcountymd.gov>
Subject: RE: Public Notice

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

Good morning,

Thank you for your legal notice request.

A ***proof*** is attached for your review and approval. *Please carefully review the proof to ensure that all text is accurate for publication.* Your response is needed by ***Tuesday December 15, 2020*** *before* **12pm** deadline to ensure the notice is printed on ***Thursday December 17, 2020*** in the ***Howard County Times*** and ***Columbia Flier***. If approved, I can go ahead and invoice the account, **CU00168892- Howard County Dept of Housing** for the amount of ***$298.05***.

Ad number for reference: **6836198**

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

Thank you,

Colleen O'Connor
Inbound Advertising Representative

Baltimore Sun, 410-539-7700 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581
Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525
Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-6160
Sun Sentinel, 800-250-2000 • *Tidewater Review*, 757-253-6128 • *Virginia Gazette*, 757-253-6126
Virginian-Pilot, 757-622-1455

TRIBUNE PUBLISHING
the results group

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

2

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Thursday, December 10, 2020 10:12 AM
To: Harris, Ellen <ceharris@baltsun.com>; Welenc, Charlie <cwelenc@tribpub.com>; PPCLegals-1 <legals@patuxent.com>; cnglegal@tribpub.com <cnglegal@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Delk, Tracy <tdelk@howardcountymd.gov>
Subject: Public Notice

Caution: External Sender

Good Morning:

Customer # CU00168892

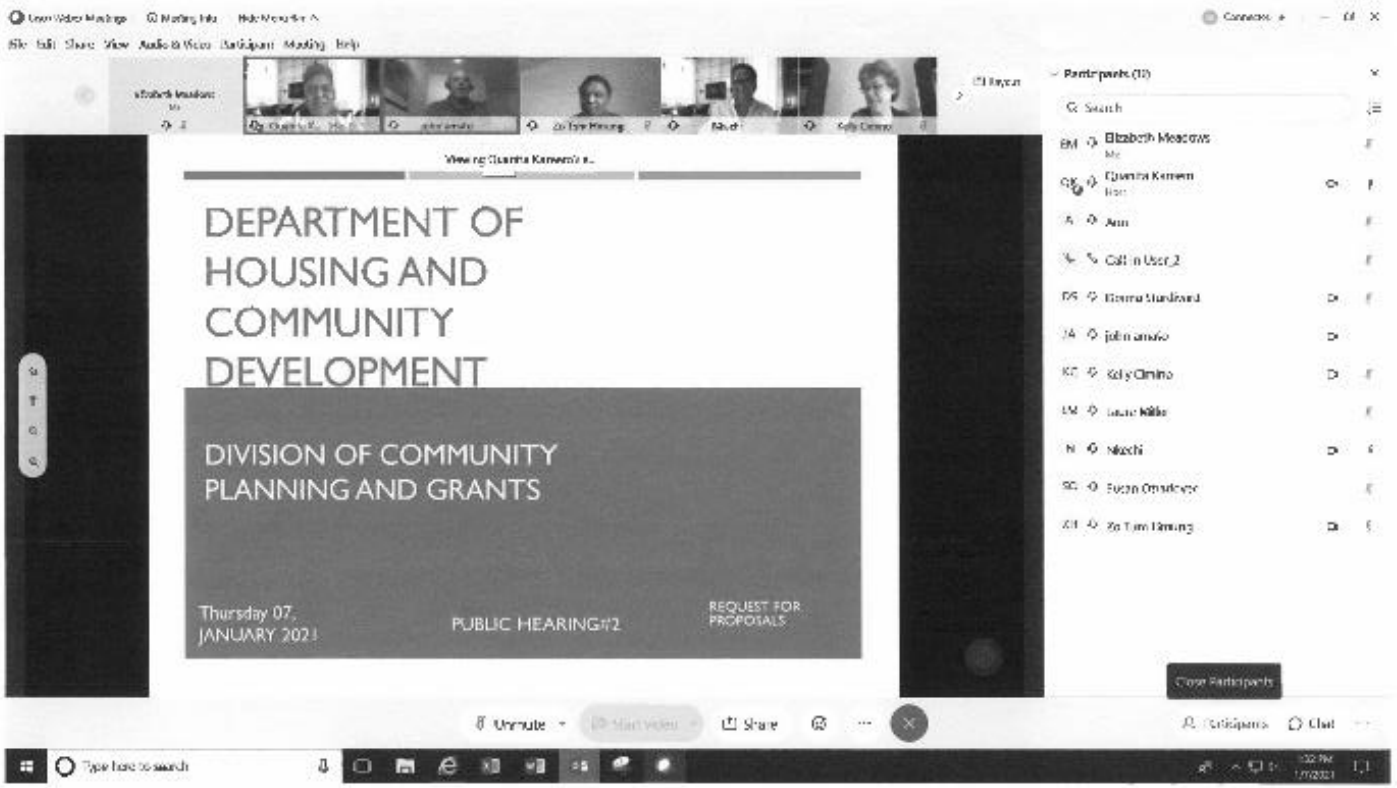
Please publish the attached Public Notice in the **December 17, 2020** issues of the Howard County Times and Columbia Flier.

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

Thanks very much, Elizabeth

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

3



OMB Control No: 2506-0117 (exp. 09/30/2021)

Meadows, Elizabeth

From:	Kareem, Quanita
Sent:	Thursday, January 7, 2021 3:20 PM
To:	Animashaun, Nkechi
Cc:	Meadows, Elizabeth
Subject:	RE: Program Applications

Apologies for the delay, the website has been updated. Maybe send the link to those who attended -
https://www.howardcountymd.gov/housing_grants

Quanita Kareem, Compliance Officer
HOWARD COUNTY DEPARTMENT OF
HOUSING & COMMUNITY DEVELOPMENT
Direct Dial: 410-313-3386
qkareem@howardcountymd.gov

From: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>
Sent: Wednesday, January 6, 2021 5:16 PM
To: Kareem, Quanita <qkareem@howardcountymd.gov>
Cc: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Subject: Program Applications

Hi Quanita,

Attached to this email are the applications to be posted on our website tomorrow morning. The verbiage to precede it could be,

"Interested in applying for CDBG, HOME, or Fee-in-Lieu Program funds for the upcoming program year? If yes download the appropriate application below. If you need a Microsoft Word version of the application, feel free to email nanimashuan@howardcountymd.gov Applications are due on or before February 1, 2021 no later than 3:30pm."

As always, let me know if you have any additional questions.
Kind Regards,

Nkechi M. Animashaun, HOME Program Specialist

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

1

nanimashaun@howardcountymd.gov

2

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Wednesday, December 16, 2020 9:27 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi
Subject:	Update for Public Notice on Webpage

Hi Quanita;

Can you please remove the current FFY2021 Annual Action Plan Virtual Needs Hearings narrative on the Grants webpage with the following? Thanks very much, Elizabeth

PUBLIC NOTICE/NOTICE OFVIRTUAL PUBLIC HEARING

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in a Virtual Public Hearing regarding the County's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

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

Below is the meeting date and time for the WebEx meeting:

- **Thursday, January 7, 2021 at 1:30 PM**

To participate in Needs Hearing Meeting, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov. to receive the WebEx link and code for the meeting.

Applications for funding will be available following the meeting. The application will also be available on the County's web page at www.howardcountymd.gov. **The Application submission deadline is Monday, February 01, 2021 at 3:30 pm.**

M. Elizabeth Meadows, Chief
Community Planning and Grants

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

2

HOWARD COUNTY
MARYLAND

Calvin Ball, County Executive

County Executive | County Council | Courts
Boards and Commissions

Home > Departments > Housing and Community Development > I Am a Non-Profit

Departments

Community Planning and Grants

What are our Grants?

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

PUBLIC NOTICE/NOTICE OF VIRTUAL PUBLIC HEARING

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and non-profit organizations to participate in a Virtual Public Hearing regarding the County's

Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs and the development of the FFY2021 Annual Action Plan.

The Action Plan is the County's yearly application that is submitted to the U.S. Department of Housing and Urban Development (HUD) for funding under the CDBG and HOME Programs. It is anticipated that Howard County will receive approximately $1,309,534.00 in CDBG funds and $465,543.00 in HOME funds for the FFY2021 Program Year.

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

Below is the meeting date and time for the WebEx meeting:

- Thursday, January 7, 2021 at 1:30 PM

To participate in the Needs Hearing, please email Ms. Quanita Kareem at qkareem@howardcountymd.gov to receive the WebEx link and code for the meeting.

Applications for funding will be available following the meeting. The application will also be available on this page. **The Application submission deadline is Monday, February 01, 2021 at 3:30 pm.**

FFY 2019 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

HOWARD COUNTY FFY2019 SUBSTANTIAL AMENDMENT

COVID-19 CDBG NEEDS HEARING INVITATION

CARES ACT CDBG-CV - Round 2 Application

FFY2020 – FFY2024 CONSOLIDATED PLAN

Public Notice and Notice of Public Comment Period

EVENTS

COVID 19 CDBG Update

CDBG-CV FFY2019 SUBSTANTIAL AMENDMENT

HOME Program Policy Guide

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

FFY2021 Request for Proposals (RFP) Second Annual Needs Hearing

About this Event

Thank you all for participating in the First Annual Needs Hearing as we prepare for the upcoming program year , and draft our FFY2021 Annual Action Plan. Your comments related to the needs in the community, the challenges faced when working with low/moderate income households and the unmet housing and community development needs were very informative, insightful and will be impactful as we write the draft. In order to apply for funding, we invite you to attend our Second Annual Needs Hearing, where we will share grant specfic information, the application process and other critical information related to the administration of these annual grants.

Be sure to register early!

Date And Time

Thu, January 7, 2021
1:30 PM – 2:30 PM EST
Add to Calendar

Location

Online Event

Nkechi M. Animashaun

Organizer of FFY2021 Virtual Needs Hearing #2

Follow Contact

Meadows, Elizabeth

From: Nkechi M. Animashaun <noreply@campaign.eventbrite.com>
Sent: Wednesday, December 16, 2020 3:31 PM
To: Meadows, Elizabeth
Subject: You're invited to FFY2021 Virtual Needs Hearing #2 (Jan 7, 2021)

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

Hello Elizabeth,

You are invited to the following event:

FFY2021 VIRTUAL NEEDS HEARING #2

Event to be held at the following time and date.

Thursday, January 7, 2021 from 1:30 PM to 2:30 PM (EST)

Attend Event

FFY2021 Request for Proposals (RFP) Second Annual Needs Hearing

We hope you can make it!

Cheers,

Nkechi M. Animashaun

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

FFY2021 ANNUAL ACTION PLAN

30-DAY PUBLIC COMMENT PERIOD

NOTICE BACKUP

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

PUBLIC NOTICE
AND
NOTICE OF PUBLIC COMMENT PERIOD

Howard County Housing
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

February 25, 2021

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2021 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents.

The FFY2021 AAP is the second AAP under the approved five (5) Year Consolidated Plan. A copy of the proposed FFY2021 AAP Draft with proposed budget will be available by February 22, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/ .

30-Day Public Comment Period

Howard County begins February 22, 2021 and run through Wednesday, March 24, 2021 at 11:59.9 PM. Written comments must be received by the end of the thirty (30) day Public Comment Period.

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council office, were closed to the public until further notice. Government operations, including those of the County Council are continuing through teleworking. To provide comments or concerns for the Draft FFY2021 Annual Action Plan, please use the mailing addresses or email information below:

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

Meadows, Elizabeth

From:	O'Connor, Colleen Ann <co@tribpub.com>
Sent:	Wednesday, February 17, 2021 1:34 PM
To:	Meadows, Elizabeth
Cc:	Animashaun, Nkechi; Wall, Thomas F; Deik, Tracy
Subject:	RE: Public Notice

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

Good afternoon!

I have submitted your ad **6887150**, for publication. Your account **CU00168892** has been invoiced. You will typically receive your affidavit about 7-10 business days after the final date of publication.**

If you need anything further, please let me know!

Have a lovely day,

Colleen O'Connor
Inbound Advertising Representative

Baltimore Sun, 410-538-7700 • *Capital Gazette*, 410-268-7600 • *Carroll County Times*, 410-857-5531
Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860 525 2525
Morning Call, 610-820-6565 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-5160
Sun Sentinel, 800-250-2020 • *Tidewater Review*, 757 263 8126 • *Virginia Gazette*, 757-253-8125
Virginian-Pilot, 757-622-1455

TRIBUNE PUBLISHING
the results group

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

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Wednesday, February 17, 2021 12:06 PM
To: O'Connor, Colleen Ann <co@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: Public Notice

Caution: External Sender
Hi Colleen:

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

This draft looks good, it is approved for publication.

Thanks very much, Elizabeth

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

From: O'Connor, Colleen Ann <co@tribpub.com>
Sent: Wednesday, February 17, 2021 10:38 AM
To: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Deik, Tracy <tdeik@howardcountymd.gov>
Subject: RE: Public Notice

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

Good morning,

Thank you for your legal notice request.

A ***proof*** is attached for your review and approval. *Please carefully review the proof to ensure that all text is accurate for publication.* Your response is needed by ***Tuesday February 23, 2021*** *before* **12pm** deadline to ensure the notice is printed on ***Thursday February 25, 2021*** in the ***Howard County Times*** and the ***Columbia Flyer***. If approved, I can go ahead and invoice the account, **CU00168892- Howard County Dept of Housing** for the amount of ***$308.75.***

Ad number for reference: **6887150**

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

Thank you,

Colleen O'Connor
Inbound Advertising Representative

Baltimore Sun, 410-539-7700 • *Capital Gazette*, 410-268-7000 • *Carroll County Times*, 410-857-5581
Chicago Tribune, 312-222-2222 • *Daily Press*, 757-247-4700 • *Hartford Courant*, 860-525-2525
Morning Call, 610-820-6556 • *New York Daily News*, 212-210-2100 • *Orlando Sentinel*, 407-420-6160
Sun Sentinel, 954-260-2000 • *Tidewater Review*, 757-253-8126 • *Virginia Gazette*, 757-253-8126
Virginian-Pilot, 757-622-1455

TRIBUNE PUBLISHING
the results group

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

2

Please note: Our classified advertising team continues to work from home, following social distancing guidance due to COVID-19. Affidavits are being prepared weekly. If you have an urgent request, please let us know. We appreciate your patience during these unprecedented times and look forward to working with you in the better days ahead.

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Wednesday, February 17, 2021 7:11 AM
To: Harris, Ellen <ceharris@baltsun.com>; Welenc, Charlie <cwelenc@tribpub.com>; PPCLegals-1 <legals@patuxent.com>; cnglegal@tronc.com <cnglegal@tribpub.com>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>; Delk, Tracy <tdelk@howardcountymd.gov>
Subject: Public Notice

Caution: External Sender

Good Morning:

Customer # CU00168892

Please publish the attached Public Notice in the **February 25, 2021** issues of the Howard County Times and Columbia Flier.

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

Thanks very much, Elizabeth

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

3

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6887150

Printed: 2/17/2021 9:36:11 AM

Page 1 of 3

* Agency Commission not included

GROSS PRICE * : **$308.75**

PACKAGE NAME: CNG Howard County Times Single

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6887150

Printed: 2/17/2021 9:36:11 AM

Page 2 of 3

* Agency Commission not included

GROSS PRICE * : **$308.75**

PACKAGE NAME: CNG Howard County Times Single

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

AdSize(s): 2 Column (8TAB)

Run Date(s): Thursday, February 25, 2021

Color Spec. B/W

Preview

THE BALTIMORE SUN MEDIA GROUP

Order ID: 6887150

Printed: 2/17/2021 9:36:11 AM

* Agency Commission not included

GROSS PRICE * : **$308.75**

PACKAGE NAME: CNG Howard County Times Single

PUBLIC NOTICE
AND
NOTICE OF PUBLIC COMMENT PERIOD
Howard County Housing
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

February 25, 2021

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2021 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents.

The FFY2021 AAP is the second AAP under the approved five (5) Year Consolidated Plan. A copy of the proposed FFY2021 AAP Draft with proposed budget will be available by February 22, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/.

30-Day Public Comment Period

Howard County begins February 22, 2021 and run through Wednesday, March 24, 2021 at 11:59.9 PM. Written comments must be received by the end of the thirty (30) day Public Comment Period.

Effective March 18, 2020, in response to the COVID-19 pandemic. Howard County non-emergency County offices and facilities, including the County Council office, were closed to the public until further notice. Government operations, including those of the County Council are continuing through teleworking. To provide comments or concerns for the Draft FFY2021 Annual Action Plan, please use the mailing addresses or email information below:

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

02/25/2021 6887150

OMB Control No: 2506-0117 (exp. 09/30/2021)

Meadows, Elizabeth

From:	Meadows, Elizabeth
Sent:	Wednesday, February 17, 2021 8:24 AM
To:	Kareem, Quanita
Cc:	Animashaun, Nkechi; Wall, Thomas F
Subject:	FFY21 Action Plan 30-Day Comment Period Narrative for Webpage

Hi Quanita:

I wanted to get you narrative for our Grants webpage ahead Monday (2/22) when our 30-Day Comment Period begins. With the snow coming I wanted to make sure you had information. Also, I hope to get the finished draft by Friday (2/19) afternoon. Thanks very, Elizabeth

PUBLIC NOTICE
AND
NOTICE OF PUBLIC COMMENT PERIOD

Howard County Housing
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2021 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents.

The FFY2021 AAP is the second AAP under the approved five (5) Year Consolidated Plan. A copy of the proposed FFY2021 AAP Draft with proposed budget will be available by February 22, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/ .

30-Day Public Comment Period

Howard County begins February 22, 2021 and run through Wednesday, March 24, 2021 at 11:59.9 PM. Written comments must be received by the end of the thirty (30) day Public Comment Period.

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council office, were closed to the public until further notice. Government operations, including those of the County Council are continuing through teleworking. To provide comments or concerns for the Draft FFY2021 Annual Action Plan, please use the mailing addresses or email information below:

Written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, at

1

9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046. Comments can also be provided by email, either to Kelly Cimino at kcimino@howardcountymd.gov or to Elizabeth Meadows at emeadows@howardcountymd.gov.

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

2

Meadows, Elizabeth

From:	Kareem, Quanita
Sent:	Wednesday, February 17, 2021 9:26 AM
To:	Meadows, Elizabeth
Cc:	Animashaun, Nkechi; Wall, Thomas F
Subject:	Re: FFY21 Action Plan 30-Day Comment Period Narrative for Webpage

Good morning

Thank you for the advance notice. Also, I usually change the part where you direct them to the website. I'll send you a shortcut link to use permanently that will take people directly to that page instead of the trying to find it.

Quanita Kareem
HoCo DHCD
Sent via mobile device. Please excuse any errors.

From: Meadows, Elizabeth <emeadows@howardcountymd.gov>
Sent: Wednesday, February 17, 2021 8:23:50 AM
To: Kareem, Quanita <qkareem@howardcountymd.gov>
Cc: Animashaun, Nkechi <Nanimashaun@howardcountymd.gov>; Wall, Thomas F <Tfwall@howardcountymd.gov>
Subject: FFY21 Action Plan 30-Day Comment Period Narrative for Webpage

Hi Quanita;

I wanted to get you narrative for our Grants webpage ahead Monday (2/22) when our 30-Day Comment Period begins. With the snow coming I wanted to make sure you had information. Also, I hope to get the finished draft by Friday (2/19) afternoon. Thanks very, Elizabeth

PUBLIC NOTICE
AND
NOTICE OF PUBLIC COMMENT PERIOD

Howard County Housing
9820 Patuxent Woods Drive, Suite 224
Columbia, MD 21046

The Howard County Department of Housing and Community Development invites all interested citizens, community groups, agencies and organizations to attend a public meeting to obtain your comments regarding the development of the FFY2021 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents.

The FFY2021 AAP is the second AAP under the approved Five (5) Year Consolidated Plan. A copy of the proposed FFY2021 AAP Draft with proposed budget will be available by February 22, 2020 on the County's website under "Departments – Housing and Community Development" at http://www.howardcountymd.gov/ .

1

30-Day Public Comment Period

Howard County begins February 22, 2021 and run through Wednesday, March 24, 2021 at 11:59.9 PM. Written comments must be received by the end of the thirty (30) day Public Comment Period.

Effective March 18, 2020, in response to the COVID-19 pandemic, Howard County non-emergency County offices and facilities, including the County Council office, were closed to the public until further notice. Government operations, including those of the County Council are continuing through teleworking. To provide comments or concerns for the Draft FFY2021 Annual Action Plan, please use the mailing addresses or email information below:

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

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

2

FFY2021 ANNUAL ACTION PLAN

PUBLIC HEARING # 4 & #5

NOTICE

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

PUBLIC NOTICE / NOTICE OF PUBLIC HEARINGS

Howard County Housing
9820 Patuxent Woods Drive, Meeting Room 212
Columbia, MD 21046

March 25, 2021

The Howard County Department of Housing and Community Development invite all interested citizens, community groups, agencies and organizations to attend the following Public Hearings to obtain your comments regarding the development of the FFY2021 Annual Action Plan (AAP) Draft and proposed Budget. The AAP is the County's yearly application for funding under the Community Development Block Grant (CDBG) Program and the Home Investment Partnerships Program (HOME). Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities that principally benefit low and moderate-income residents. The FFY2021 AAP is the first AAP under the approved five (5) Year Consolidated Plan.

Funded by the U.S. Department of Housing and Urban Development, the CDBG and HOME programs provide funds for a variety of housing and community development activities for low and moderate-income residents. The Howard County draft FFY2021 Action Plan was made available for review and comment starting February 22, 2021 at Howard County Housing, 9820 Patuxent Woods Dr., Suite 224, Columbia, MD 21046. The Action Plan Draft is also available on the Howard County Housing webpage of the County's website at www.howardcountymd.gov under "Departments".

Public Hearing Dates and Locations

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

Thursday, April 08, 2021 – 6:00 PM	**Housing and Community Development Board** **Provide comments: housing@howardcountymd.gov**
Monday, April 19, 2021 – 7:00 PM	**County Council Telework Session** **Provide comments: councilmail@howardcountymd.gov**

If you plan on testifying, a written copy of your testimony should be provided at the time of the hearing. If you cannot attend the Hearing but would like to offer testimony, written comments must be directed to Kelly Cimino, Director, Howard County Department of Housing and Community Development or to Elizabeth Meadows, Chief, Community Planning and Grants, at the Howard County Housing office, address in the notice above. Written comments must be received no later than 5:00 pm on the date of the Hearings and all comments must be received by the end of the day on April 20, 2020. (5pm)

Grantee Unique Appendices

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

HOME INVESTMENT PARTNERSHIPS PROGRAM

POLICIES AND PROCEDURES

Kelly Cimino, Director of Housing and Community Development
Elizabeth Meadows, Community Planning and Grants, Chief
Nkechi M. Animashaun, HOME Program Specialist
Updated February 2020

Table of Contents

1. Introduction
2. Background on HOME Investment Partnership Funds
3. Federal Objectives
4. Overview and General Program Rules
5. Citizen Participation
6. Definitions
7. Project Review, Application Process and Project Selection
8. Scoring
9. Funding Priority
10. Home Agreements
11. Eligible Activities
12. Ineligible Activities
13. HOME Program – Minimum /Maximum Assistance Subsidy Layering
14. Environmental Review
15. Acquisition with Relocation
16. Leveraging Other Funds
17. HOME Program-Matched Resources Requirement
18. HOME Program –Resale /Recapture
19. HOME Program – Loan Terms
20. Period of Affordability
21. HOME Program- Tenant Leases
22. HOME Program - Tenant Based Rental Assistance (TBRA)
23. HOME Program- Rental Housing Policies
24. Financial Management
25. Administration and Monitoring
26. Community Housing Development Organizations (CHDOs)
27. Other Federal Requirements
28. Property Standards
29. Annual Review and Rents and Income
30. Rental Units- Single Family Rental
31. Recording documents related to a HOME Activity
32. Recording Keeping
33. Single Audit Requirement in Federal Funding
34. Lead Based Paint Work Practice Standards

Appendix A: Program Administration Procedure
Appendix B: Howard County Affirmative Fair Housing Marketing Plan
Appendix C: Monitoring Plan
Appendix D: Using the Low-Income Housing Tax Credits with HOME Funds
Appendix D: Checklist 6-D- Annual Review of Rent and Income
Appendix F: Annual Review of Rents and Income form

Page intentionally left blank.

1. Introduction

This Policy and Procedures Manual establishes a framework for guiding the operation of the Howard County's Home Investment Partnership Fund (HOME) program. It provides an approach for making decisions and ensuring that the County's HOME program is operated in a fair and consistent manner. Lastly, the Policy and Procedures Manual provides information for program sub recipients in the management of their projects and how to achieve and maintain compliance with federal, state, and local requirements.

Disclaimer: The following policies were developed within the guidelines of the HOME regulations established by the Department of Housing and Urban Development (HUD) and may be revised at any time as necessitated to be in conformance with Federal regulations.

2. Background on HOME Investment Partnership Funds

The HOME Investment Partnership Program was created in 1990 through the Cranston-Gonzalez Affordable Housing Act. The sole purpose of this program is to create affordable housing for low-income individuals. HOME activities undertaken must accomplish at least one of two goals for low-income individuals; (1) Provide decent housing and/or (2) Provide suitable living environments. However, unlike CDBG, this program requires the participating jurisdiction to have a 25% match for each dollar awarded
HOME funding also strengthens the ability of state and local governments to provide housing and promotes public-private partnerships. The HOME program is administered through the U.S. Department of Housing and Urban Development (HUD), and Howard County receives funding as a Participating Jurisdiction (PJ).

Home Program Regulations are promulgated in the Code of Federal Regulations at 24 CFR Pt 92 with subparts A through M.

Sub Part K (24 CFR 92.500 - 92.509) explains general responsibilities of HOME grant administration including uniform administrative requirements, provisions of subrecipient agreements, program income, use of real property, record-keeping and reporting, and closeout procedures.

Sub Part H (24 CFR 92.350 - 92.358) details other HOME program requirements including affirmative marketing, environmental standards, displacement, relocation and acquisition, labor standards, lead-based paint, and conflicts of interest.

For any PJ to participate in entitlement programs, Howard County must develop a strategic five-year plan known as the Consolidated Plan or "Con Plan". Community members along with stakeholders create this plan that provides local direction. The Consolidated Plan establishes community needs, goals and strategies, as well as identifying and prioritizing local objectives,

within the parameters of the national objectives for these entitlement programs. After approval by Council, the plan is submitted to HUD and becomes part of our contractual agreement to pursue stated objectives with funding priorities. The plan is renewed and resubmitted for approval every five years. The current Consolidated Plan dated 2016-2019 can be found at https://www.howardcountymd.gov/Departments/Housing/Community-Planning-and-Grants-Management

The County must also submit an annual Action Plan to HUD to formally request allocated program funds. The annual Action Plan includes a review of projects and organizations that the County has selected to fund for the following program year. In this plan, the County also describes how selected activities meet local objectives. Upon approval by the County Council, a grant agreement is executed between HUD and the County and funds become available for local distribution.

At the conclusion of a program year, the County is required by HUD to complete a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER outlines how funds from both CDBG and HOME were expended, including how the funds were used to meet the priorities, goals and objectives outlined in both the Consolidated and Annual Action Plans.

3. Federal Objectives

HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. HOME funds may be applied to a broad range of eligible activities such as providing home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; build or rehabilitate housing for rent or ownership; or for "other reasonable and necessary expenses related to the development of non-luxury housing," including site acquisition or improvement, demolition of dilapidated housing to make way for HOME-assisted development, and payment of relocation expenses. HOME funds may be applied to provide tenant-based rental assistance contracts of up to 2 years if such activity is consistent with an approved Consolidated Plan and justified under local market conditions.

FEDERAL OUTCOME CATEGORIES

Howard County is responsible to report on activities through the outcome and performance measurement system established by HUD. The system is designed to provide the opportunity for the federal government to collect information on outcomes funded with grant assistance, and thereby demonstrate program results.

The HUD system identifies three overarching objectives and three measurable outcomes. When a proposal is reviewed, staff will determine how the specific activities including intended results, benefits or objectives fall within the outcome parameters outlined by HUD. The intent when funding an activity determines which of the three objectives best describes the purpose of the activity. The three objectives include:

1. SUITABLE LIVING ENVIRONMENT: In general, this objective relates to activities that are

designed to benefit communities, families, or individuals by addressing issues in their living environment.

2. DECENT HOUSING: The activities that typically would be found under this objective are designed to cover the wide range of housing possible under CDBG or HOME. This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort, since such programs would be more appropriately reported under Suitable Living Environment.

3. ECONOMIC OPPORTUNITIES: This objective applies to the types of activities related to economic development, commercial revitalization, or job creation. This objective is only used in the CDBG program.

The three outcome categories are described:

1. AVAILABILITY/ACCESSIBILITY: This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low and very low income people where they live.

2. AFFORDABILITY: This outcome category applies to activities that provide affordability in a variety of ways in the lives of low and moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.

3. SUSTAINABILITY - PROMOTING LIVABLE OR VIABLE COMMUNITIES: This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

A summary of the objectives and outcomes identified in the Plan Needs Assessment are placed in the 5-Year Consolidated Plan and Annual Action Plan. These areas of need are used as the basis for determining eligibility of activities. Each objective must be tied back to a goal noted in the Con Plan.

Needs identified in the Con Plan and Action Plan are as follows:

Housing Need: There is a need for decent, safe and sanitary housing that is affordable and accessible to homebuyers, homeowners and renters.

Homeless Need: There is a need for housing, services, and facilities for homeless persons and persons at risk of becoming homeless.

Other Special Needs: There is a need for housing, services and facilities for persons with special needs.

Community Development Need: There is a need to improve community facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Economic Development Need: There is a need to promote skills training, employment, development, connectivity and economic opportunities in the County.

Administration, Planning and Management Need: There is a need for planning, administration, management and oversight of federal, state and local funded programs.

4. Overview of HOME Program in Howard County

Howard County is responsible for executing all program activities in compliance with its adopted policies and procedures, as well as applicable state, federal, and local regulations. Howard County is responsible for general oversight of the program which includes the allocation of resources, policy development/oversight, and community relations issues associated with the programs.

HUD published a Final Rule in the Federal Register on August 23, 2013 to amend the HOME Program regulations. These amendments to the HOME regulations represent the most significant changes to the HOME Program in seventeen (17) years. This document is amended to reflect the changes made to the HOME Program rule.

This includes actions such as:
1) Implementing eligibility criteria;
2) Processing and approving project applications;
3) Preparing work orders and bid documents (if applicable);
4) Oversight of work and conducting progress inspections during construction;
5) Preparing security documents including mortgages and notes, and servicing recoverable grants where appropriate;
6) Preparing and executing subordination agreements for property owners who continue to meet the subordination requirements of the housing programs;
7) Preparing and executing affordability agreements, contractor/owner/municipality agreements, covenants and other agreements.

These guidelines may be amended based upon any changes in federal, state, or local regulations or administrative requirements.

Howard County uses its HOME Program funds to meet its housing and community development needs, which are included in its 5-year Consolidated Plan. In the current Consolidated Plan, there are ten (10) goals and objectives which include housing rehabilitation, home ownership, operation support, housing, special needs housing, community facilities, public services, overall coordination, fair housing and prevention and housing; with the last five activities being funded by the Community Development Block Grant (CDBG) program.

Some of the types of projects that may be funded include:

- Rental housing development;
- Community Housing Development Organization (CHDO) projects;
- Homeowner Rehabilitation; and
- Homebuyer Assistance.

Howard County's Department of Housing and Community Development (DHCD) manages the HOME program for Howard County. Staff members of the Division of Community Planning and Grants Management, namely the HOME Program Specialist oversee all HOME processes described in this policy and procedure manual as well as the ongoing oversight and monitoring of the program as HOME-funded projects are executed.

5. Citizen Participation

Howard County has established a Citizen Participation Plan to provide opportunities for citizen involvement in the process of developing and implementing the Community Development Block Grant (CDBG) Program and the HOME Program.

The Citizen Participation Plan outlines when, where and how citizens can access information, review and comment on major community plans and comment on progress of funded activities under these programs.

6. Definitions

A. Con Plan - Consolidated Plan - A plan prepared in accordance with the requirements set forth in 24 CFR Part 91 which describes community needs, resources, priorities and proposed activities to be undertaken under certain HUD programs, including CDBG.

B. Contractors - A contractor is an entity paid with CDBG funds in return for a specific service (e.g., construction). Contractors must be selected through a competitive procurement process.

C. DOL – Department of Labor – The Federal department of the Unites States government that is responsible for labor regulations and requirements.

D. EEO – Equal Employment Opportunity – Laws and regulations that require CDBG recipients to provide equal opportunity to all individuals without regard to race, color, religion, age, familial status, disability, national origin, or sex in the administration of their programs.

E. Extremely Low Income – Under CDBG regulations, a household/family having an income equal to or less than the Section 8 Very Low Income limit (30 percent of the area median income) as established by HUD.

F. Fair Housing – Multiple laws and regulations applied to the CDBG program that prohibits a wide range of discriminatory practices and requires the CDBG program

to be administered in a manner which affirmatively furthers fair housing.

G. Family – All persons living in a household who are related by birth, marriage, or adoption.

H. Grantee – See Recipient.

I. HOME-Home Investment Partnership Funds, The Federal entitlement program that provides funds to states and cities/counties to aid in the assistance of affordable housing.

J. Household – All the persons who occupy a housing unit. The occupants may be a single family, one person living along, two or more families living together, or any groups of related or unrelated persons who share living arrangements.

K. HUD – The United States Department of Housing and Urban Development. HUD establishes the regulations and requirements for the CDBG program and exercises oversight responsibilities for the use of CDBG funds.

L. LMI – Low and Moderate Income - A household/family having an income equal to or less than, the Section 8 Low Income limit (80 percent of the area median) as established by HUD.

M. Local match – non-Federal funding provided by a community/recipient as a condition of award or use of HOME funds. The amount of local match amount is 25% for each HOME eligible activity receiving funding. The match can come from a variety of non-grant, cash sources.

N. Low income – Under HOME regulations, a household/family having an income equal to or less than the Section 8 Very Low Income limit (50 percent of the area median income) as established by HUD.

O. MBE/WBE – Minority Business Enterprise / Woman-owned Business Enterprise; Companies owned by minorities and/or women.

P. Moderate Income – Under CDBG regulations, a household/family having an income equal to or less than the Section 8 Low Income limit (80 percent of the area median), but greater than the Section 8 Very Low Income limit (50 percent of the area median) as established by HUD.

Q. National Objective – The three main goals of the CDBG program – benefit LMI individuals, prevent or eliminate slum/blight, or meeting a particular urgent need. All funds expended under the program must meet one of the three National Objectives.

R. OMB – Office of Management and Budget – The oversight agency for matters relating to financial management and audits. OMB requirements are issued in the form of "circulars."

S. Project Development – The Division within the West Virginia Development Office that processes requests for payments for CDBG funds and monitors financial aspects of program implementation and reviews audits.

T. Recipient – Eligible localities and agencies that receive and use HOME Program funds under the State of Howard County's HOME Program. Commonly referred to as "Grantee".

U. Regulations – The requirements developed and issued by the agency responsible for specific programs and/or requirements. For the HOME Program, regulations are issued by HUD and are codified at 24 CFR Part 92.

V. RFP – Request for Payment – The formal process of requesting payment of HOME Program funds from Howard County's Department of Housing and Community Development. RFP can also refer to procuring a Request for Proposal.

W. Section 3 – The Housing and Urban Development Act of 1968, as amended in 1992, that requires employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low and very low income persons; particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons.

X. Statute/Statutory – Requirements that have their basis in laws passed by Congress. For CDBG, the statute is Title 1 of the Housing and Community Development Act of 1974. Statutory provisions cannot be waived by HUD except in cases of natural disaster and must be amended or approved by Congress.

Y. Sub-recipient – Sub-recipients are government or private nonprofit organizations chosen by the Grantee to undertake certain eligible HOME activities. Sub-recipients may also be referred to as sub-Grantees.

Z. URA – Uniform Relocation Act – A Federal regulation governing the acquisition of real property and the relocation or displacement of persons from federally-assisted projects.

AA. Very Low Income – Under HOME Program regulations, a household/family having an income equal to or less than the Section 8 Low Income limit and that does not exceed 50 percent of the area median income.

BB. ABA – Architectural Barriers Act of 1968

CC. ADA – Americans with Disabilities Act

DD. AFFH – Affirmatively Furthering Fair Housing

EE. AI – Analysis of Impediments to Fair Housing

FF. CAPER – Consolidated Annual Performance Evaluation Report

GG. CFR – Code of Federal Regulations

HH. PI – Program Income

II. PJ – participating Jurisdiction (in the HOME program)

JJ. Title VIII – Title VIII of the Civil Rights Act of 1968 (also known as the Fair Housing Act)

KK. URA – Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

LL. WBE – Woman-owned Business Enterprise

7. Project Review, Application Process and Project Selection

Howard County's program year begins July 01 and runs through June 30 of the following year. A Public Notice is published in the local newspapers and on the County's website around December of each year announcing the anticipated available funding and notifying nonprofits of the application process for the upcoming program year. However, funding amounts are announced and estimated based on the anticipated federal budget. The actual amounts are typically provided from HUD prior to when Howard County begins writing the Annual Action Plan. Adjustments are made to award amounts to reflect the correct formula allocation for the upcoming program year. Consideration of funding amounts will be made on a case by case basis in keeping with the intent of the requirements of the HOME Program and available funding.

Annual Project Application Process

All HOME Program Funds are allocated based on the review and recommendations pertaining to applications submitted to the County through a yearly funding process.

Funding provided by the process will be awarded for the upcoming fiscal year (July 1- June 30). However, no contracts/agreements for funding can be executed until DHCD has executed funding agreements with HUD, which may be as late as September of the program year.

This is a competitive application process for limited funding; therefore, applications that meet all criteria are not guaranteed an award of funds and successful applications may be funded for less than the amount requested. Funding requests may be adjusted based on underwriting, subsidy layering reviews, the County's determination of the financial gap, proven market-based demand and economic growth.

Applications may be submitted during the course of the program year if no applications were received as part of the yearly funding process.

Application Process

Applications are made available in January for the next fiscal year allocations. The applications are due in February. Applications are submitted through the DHCD staff located at 6751 Columbia Gateway Drive, Columbia MD 21046 where they are date and time stamped.

Agencies that are currently receiving County CDBG funds, who are also applying for HOME funds, must be in compliance with all terms of their current agreement(s) and must not have any outstanding audit findings, monitoring findings or concerns as determined by the County.

DHCD may adjust funding requests based on underwriting, subsidy layering review, revised determination of the financial gap, revised evaluation of the DHCD proportionate, share proven market-based demands and economic growth.

No work on the project may begin nor can HOME Program funds be released until the environmental review process has been completed in accordance with the provisions of the National Environmental Policy Act of 1969 and the related authorities listed in HUD's Regulations at 24 CFR Parts 50 and 58. Ifa development site is purchased or under a purchase agreement prior to or during the funding round, the purchase must not be subject to the receipt of DHCD funding.

The applicant may be ineligible to be considered for funding if, in DHCD's discretion, the applicant has demonstrated an untimely use of previously awarded HOME funds. The applicant shall not exclude any organization or individual from participation under any program funded in whole or in part by HOME Program funds on the grounds of age, disability, race, creed, color, national original, familial status, religion or sex. No applicant, clients or contractors that have been suspended or debarred under HOME (debarred list at http://epls.arnet.gov) or any other federal program may receive HOME funds.

Project Selection

Applications submitted will be reviewed by Howard County Housing staff that may elect to use a committee of reviewers, to ensure that all aspects of potential HOME projects are evaluated from a multidisciplinary perspective. Recommendations on which projects to fund will be based on review and ranking of the projects and on the availability of HOME funds.

Incomplete applications or projects that cannot meet these requirements will not be considered for HOME funding. Instead, these applications will be withdrawn from consideration, and the applicant will be notified of areas of improvement needed in their application so that it may be resubmitted in the future if so desired by the applicant.

For any project to be considered for CHDO set-aside funding, whether the CHDO is the owner with one or more individuals, a corporation, a partnership or other legal entity, the CHDO MUST be the managing general partner with effective decision making control.

Project Approval

Once staff has completed the review and ranking, projects will be conditionally funded and applicants notified. A public hearing on the conditionally funded projects will be held in April. The general public, project beneficiaries and project applicants will be afforded the opportunity to speak on the recommended project list. Once the County Council approves the County's Annual Action Plan, all awards will then be considered final and formal.

Post Award Requirements

Projects and programs awarded funding must:

- Enter into a funding agreement within 24 months;
- Begin to expend funds within 12 months of executing a funding agreement;
- Expend all funds within 24 months of allocation;
- Complete relocation surveys, if applicable, within 90 days of obtaining site control, if the previous owner denies access to complete this activity, then the surveys must be completed within 90 days of assuming management control; and
- Must not conduct any activity at the project site until the HUD required environmental review has been completed.

8. Scoring of Grant Applications

- Each application is reviewed by staff for completeness; ensuring that all requested supportive documents are submitted.
- The application review is completed by a grant review committee (GRC) composed of Howard County employees. The GRC members score each application, and discuss with the Grants staff.
- The applications are scored and then prioritized and provided to the Director of the Department who then presents to the County Council for approval.

9. Funding Priority

Funding priority will be given to projects that;

- Provide rental units for persons at or below sixty percent of the area median income and for projects that have five (5) or more HOME units, at least twenty percent should be occupied by individuals or families who have gross annual incomes that are fifty percent or less of the area median income;
- Projects that help end homelessness;
- Meet the strategic plan objectives provided in the Consolidated Plan;
- Have adequate community support, and support an identified community need;
- Maximize the use of outside funds, match and services which are coordinated with other public and private efforts;
- Established means for program evaluation and accomplishment tracking;
- Are clearly defined as to scope, location, need, budget, goals;
- Demonstrate the applicant has the capacity and the capability to carry out the project successfully;
- Connection with employment in the community; and
- Can begin immediately and finish within the contracted time.

10. HOME Agreements

Howard County will initiate a HOME Agreement and other supporting documents based on the nature of the activity. Agreements are typically not signed until late August or September except in the case of acquisition activities. In the latter, the HOME Agreement is signed after the proposed property has successfully satisfied the requirements of an environmental review. Any expenditures or work initiated prior to receiving a signed copy of the Agreement will not be

approved.

11. Eligible Activities

Eligible costs depend on the HOME activity. HOME funds may be used for acquisition, new construction or rehabilitation of affordable rental housing. The 2013 HOME Rule adds language to paragraph 92.205(a)(1)to clarify that activities and costs are eligible for HOME funding only if the housing meets the property standards in 92.251 upon project completion. The developers or owners of the rental housing may be small-scale property owners, for-profit developers, nonprofit housing providers, CHDOs, the unit of local government, redevelopment organizations or a public housing agency such as the Howard County Housing Commission. DHCD staff only considers projects for HOME funds that are pursuing eligible activities. DHCD staff provides HOME funding only for eligible HOME rental housing costs which include hard (construction, rehabilitation) and soft costs (fees, insurance, appraisals) as detailed below:
All eligible uses of HOME funds are described in 24 CFR 92.206.

Hard Costs

- Acquisition of land (for a specific project which will begin within 12 months of project commitment) and existing structures;
- Site preparation or improvement, including demolition;
- Costs to make utility connections;
- Securing buildings; and
- Construction materials and labor

Soft Costs

- Financing or Surety fees;
- Credit reports;
- Title binders and insurance;
- Recordation fees, transactions taxes;
- Legal and accounting fees, including cost certification;
- Appraisals;
- Architectural/engineering fees, including specifications and job progress inspections;
- Environmental reviews and release of funds which are directly related to the project;
- Builders' or developers' fees;
- Affirmative marketing, initial leasing and marketing costs; and
- Operating deficit reserves (up to 18 months) – see specifics below.

Relocation Costs

- Payment for replacement housing, moving costs and out-of-pocket expenses;

- Advisory services; and
- Staff and overhead related to relocation assistance and services

OPERATING DEFICIT RESERVE

This reserve is meant to meet any shortfall in project income during the project rent-up period and cannot exceed 18 months. The reserve can be used only for project operating expenses, scheduled payments to replacement reserves and debt service. Reserves remaining at the end of 18 months may be retained for reserves in the project at the Department's discretion. The disposition of any remaining funds at the end of the 18-month period must

Note on Related Soft Costs: Reasonable and necessary cost incurred by the owner or Howard County, the PJ, associated with the financing, or development (or both) of new construction, rehabilitation or acquisition of housing assisted with HOME funds. These costs include but are not limited to:

- Architectural, engineering, or related professional services required to prepare plans, drawings, specifications, or work write-ups. The costs may be paid if they were incurred not more than 24 month before the date that HOME funds are committed to the project and the participating jurisdiction expressly permits HOME funds to be used to pay the costs in the written agreement committing the funds.

- Costs to process and settle the financing for a project, such as private lender origination fees, credit reports, fees for title evidence, fees for recordation and filing of legal documents, building permits, attorney fees, private appraisal fees and fees for an independent cost estimate, builders or developers fees.

- Cost of a project audit, including certification of costs performed by a certified public accountant, that the Howard County may require with respect to the development of the project.

- Cost to provide information services such as affirmative marketing and fair housing information to prospective homeowners and tenants as required by 92.351.

- For new construction or rehabilitation, the cost of funding an initial operating deficit reserve, which is a reserve to meet any shortfall in project income during the period of project rent-up (not to exceed 18 months) and which may only be used to pay project expenses, schedule payments to a replacement reserve, and debt services. Any HOME funds placed in an operating deficit reserve that remain unexpended after the period of project rent-up may be retained for project reserves if permitted by Howard County, the participating jurisdiction.

- Staff and overhead costs of Howard County directly related to carrying out the project, such as work specifications preparation, loan processing inspections,

and other services related to assisting potential owners, tenants, and homebuyers, e.g., housing counseling, may be charged to project costs only if the project is funded and the individual becomes the owner or tenant of the HOME-assisted project. For multi-unit projects, such costs must be allocated among HOME-assisted units in a reasonable manner and documented. Although these costs may be charged as project costs, these costs (except housing counseling) cannot be charged to or paid by low-income families.

- For both new construction and rehabilitation, costs for the payment of impact fees that are charged for all projects within a jurisdiction.

- Costs of environmental review and release of funds in accordance with 24 CFR part 58 which are directly related to the project.

12. Ineligible Activities

HOME funds may not be used to provide a project reserve account (except as allowed in section 92.206(d) (5) of the regulations) or operating subsidies; tenant based rental assistance with an existing Section 8 program; non-federal matching contributions for other federal programs; annual contributions to the operations of public housing; and other prohibitions as outlined in section 92.214 of the HOME regulations. The County will not use HOME funds for any of these activities.

Activities that do not satisfy the statutory requirements of the HOME program rule will not be considered and will be deemed ineligible. At least ninety percent of all units created should be created for persons at or below sixty percent of the area median income and for projects that have more than five (5) HOME units, at least twenty percent should be occupied by individuals or families who have gross annual incomes that are fifty percent or less of area median income.

13. HOME Program - Subsidy Layering

Subsidy Limits

Each project funded with HOME must be evaluated to ensure that no more HOME funds are invested in the project than are necessary to provide affordable housing. The County prefers to fund projects that are successfully leveraging various funding sources. Before committing funds, if a project has multiple funding sources, an evaluation must be made to ensure that the HOME funds, in combination with other governmental funds, do not exceed what is necessary to provide affordable housing. This is generally referred to as the "subsidy layering review." Howard County must conduct a subsidy layering review prior to the award of any funds. DHCD staff will evaluate the reasonableness and need for the requested assistance by analyzing pro-formas,

showing the full length of affordability period, for cash flow, debt –coverage ratios, and the appropriateness of fees charges with and without the HOME funds.

Forms of Subsidy

HOME allows virtually any form of financial assistance to be provided for eligible projects and to eligible beneficiaries. The County will determine what forms of assistance it will provide. Some forms of assistance will require legal instruments for implementation. HOME regulations list the following forms of assistance as eligible:

- Interest or non-interest bearing loans or advances: These loans are amortizing loans, with or without accruing interest. Repayment is expected on a regular basis so that over a fixed period of time all of the principal and interest is repaid. The term of the loan may vary and the property or some other assets are used as collateral.

- Deferred Loans (forgivable or repayable): These loans are not fully amortized. Instead, some, or even all, principal and interest payments are deferred until some point in the future. Deferred loans can be structured in a variety of ways and terms may differ greatly. Deferred payment loans use the property or some other form of collateral as security for repayment.

- Grants: Grants are provided with no requirement or expectation of repayment. They require no liens on the property or other assets.

- Interest Subsidies: This is usually an up-front discounted payment to a private lender in exchange for a lower interest rate on a loan.

- Equity Investments: An investment made in return for a share of ownership. Under this form of subsidy, the PJ acquires a financial stake in the assisted property and is paid a monetary return on the investment if money is left after expenses and loans are paid.

- Loan Guarantees and Loan Guarantee Accounts: HOME funds may be pledged to guarantee loans or to capitalize a loan guarantee account. A loan guarantee or loan guarantees account ensures payment of a loan in case of a default.

Minimum Amount of HOME Assistance

The minimum amount of HOME assistance that must be invested in a project involving rental housing or a homeownership project is $1,000 times the number of HOME-assisted units in the project. The minimum amount does not apply to tenant based rental assistance.

Maximum Per Unit Subsidy

The maximum per unit HOME varies by metropolitan area and is based on Section 234 Mortgage limits. Each year, HUD calculates these maximum amounts by area. Current subsidy limits may be obtained by contacting the HUD Baltimore CPD (Community Planning and Development) Representative or CPD Director. Under the regulation, the maximum limit relates to the HOME funds; but DHCD staff will also utilize the subsidy limit to evaluate the number of units required in the project based upon the total HOME funding in the project.

Allocating Costs

Before determining the allowable HOME subsidy amount, DHCD staff will establish the total HOME-eligible costs for the project. HOME funds may be used to assist one or more housing units in a multi-unit project. Only the actual HOME eligible development costs of the assisted units may be charged to the HOME program. If the assisted and non-assisted units are not comparable, the actual costs may be determined based on a method of cost allocation. If the assisted and non-assisted units are comparable in terms of size, features and number of bedrooms, the actual cost of the HOME- assisted units can be determined by pro-rating the total HOME eligible development costs of the project so that the proportion of the total development costs charged to the HOME program does not exceed the proportion of the HOME-assisted units in the project. Costs included in the budget are used for allocating costs. Since floating units, by definition, must be comparable, costs should always be pro-rated if HOME units float.

Project Evaluation

Before the County invests HOME funds in a project, it will assess if other governmental assistance that has been, or is likely to be made available to the project. In performing this evaluation, the County will consider the aggregate amount of assistance from HUD and other sources that is necessary to insure the project's feasibility. T he analysis includes:

- Project budget with all expenses
- Sources and Uses
- Property information
- Review of tax credit application, awards and syndication costs
- Eligible costs
- Developer fees
- Operating expenses
- Vacancy rates
- Debt ratio
- Performa

14. Environmental Review

As part of the contract preparation process, the County will conduct an environmental review under the National Environmental Policy Act (NEPA). No funds will be formally committed nor expended until the completion of the NEPA.

To expedite the process, the County proceeds with the required environmental review and information gathering prior to the Agreement being signed. The sub recipient may be required to furnish data, information and assistance as part of the environmental review.

Completion of the environmental review process is mandatory, before taking any choice-limiting actions, including the expenditure or commitment of either federal or non-federal funds.
Prohibited actions include any physical action on a site such as demolition, movement, rehabilitation, conversion, repair or construction. Further the agency may not execute a construction contract prior to environmental clearance.

15. Acquisition with Relocation

Federal law regarding acquisition and relocation is complex and involves an extensive series of notifications and actions within prescribed timelines. Rigorous documentation and recordkeeping standards are also outlined. Therefore, an agency considering such action must contact the County prior to any choice-limiting actions. Choice-limiting actions include, but are not limited to the expenditure or commitment of either federal or non-federal funds, or execution of any contract. Howard County's staff will work closely with any applicant pursuing such a project.

For more information see:

Federal Register /Vol. 73, No. 142 /Wednesday, July 23, 2008 /Notices 42895
Section 104(d) of the Housing and Community Development Act of 1974, as amended
Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

24 CFR	42	Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs
24 CFR	92.353	Displacement, Relocation, and Acquisition

24 CFR	570.606	Displacement, Relocation, Acquisition, and Replacement of Housing
49 CFR	24	Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs
42 USC	Chapter 44	Sec. 3537 (c) Prohibition of Lump-sum Payments

16. LEVERAGING OTHER FUNDS

Howard County encourages the leveraging of funds from both public and private resources to finance projects. HOME Program funds are used as gap funding. Further, the County will work with applicants to assist in applying for all available funds and leveraging other resources to implement the housing strategies and programs.

Applicants must document funding commitments and leverage sources. In addition, applicants must disclose other funding requested and the status of that request. All funds necessary for the development of a project must be committed within 12 months of this award. The County will not execute documents until all funding commitments are confirmed.

17. HOME Program- Matched Resources

The HOME program requires participating jurisdictions to have a match of at least 25%. Sources of match can be cash, donated land or real property, infrastructures improvements, bonds issued by state or local government, donated materials, equipment, or professional services, sweat equity, and the value of foregone taxes.

18. HOME Program – Resale/Recapture

Howard County administers the federal HOME program which establishes a funding mechanism to assist low income persons achieve homeownership. The HOME Loan and Regulatory agreements will contain a recapture clause.

The County may demand payment in full for any of the following reasons. The specific criteria is detailed in the deed and note attached to the property.

- Change of use of the property;
- Transfer of all or any part of the property or interest in the property;

- Homebuyer does not maintain principal residency; and
- Failure to uphold the affordability period.

19. Loan Terms

Howard County Department of Housing and Community Development (DHCD) provides assistance to rental projects as grants or loans with specific terms and restrictions incorporated on a project-by-project basis. Below is an outline of the types of loans awarded by the County.

- The loan shall be secured by a Promissory Note and/or Deed of Trust;
- Loan terms are finalized at time of project negotiation; and
- Loan amounts are based on project budget and capacity for debt.

Loan Servicing and Delinquent Payments

Howard County's Finance Department (finance) services all loans. Finance informs HOME staff of any delinquent payments, when applicable. County staff will work with property owner regarding rectifying any delinquency. If necessary, legal remedies will be pursued.

Deferred Payment Loans

These loans are available to borrowers who are utilizing the Settlement and Down Payment Loan Program (SDLP) and have a household income of less than 80% of area median income. There are no pre-payment penalties. The Deferred Payment Loan is due and payable when one or more of the following occurs:

- A change in property ownership,
- Refinance; and
- Termination of owner occupancy.

Please note: If an application for a loan is denied, the applicant must wait one year from the date of denial before submitting another application for the Housing Rehabilitation Program.

Forgivable Loans/ NON-Profit Agency Loans

These loans can be forgiven or deferred for a period of time if the borrower is in compliance with the terms and conditions of the loan. This type of loan is typically used with non-profit organizations that create affordable housing projects. Loans are negotiated at time of contract with general terms are generally at 1-3% with a 5-20 year amortization. Repayments are always expected on income producing properties.

20. Period of Affordability

HOME-assisted units must meet affordability requirements as required by the HOME regulations. Affordability periods begin with the completion of the project and affordability requirements apply regardless of the term of the project's loan, mortgage or transfer of ownership. Affordability requirements will be imposed by deed restrictions, covenants running with the land, or other mechanism approved by HUD. The affordability period is the length of time during which the HOME requirements apply to a HOME-assisted property. The affordability period can be 5, 10, 15, or 20 years, depending on the type of HOME project and the average per unit HOME investment.

The affordability period will be determined by the amount of funds invested in a project. DHCD has the right to require a minimum affordability period beyond that required by HUD. The affordability period should be thought of as the "compliance period." Throughout the period of affordability the owner must enforce funding requirements. Howard County DHCD will monitor to ensure compliance.

HOME affordability periods are minimum requirements. DHCD may, at its sole discretion, establish longer terms of affordability. The affordability period for each project is clearly defamed in each HOME written agreement.

The HOME Rule does allow for termination of affordability restrictions upon foreclosure or transfer in lieu of foreclosure as a means to encourage lenders to participate in the HOME program. However, Howard County must repay the U.S. Department of Housing and Urban Development if HOME-assisted housing fails to meet the affordability requirements for the full affordability period without regard to the term of any loan or mortgage or the transfer of ownership, even in the event of foreclosure, transfer in lieu of foreclose or assignment to the U.S. Department of Housing and Urban Development. Therefore, the Department will require grantees to repay DHCD the full amount of the HOME funds drawn for projects where affordability requirements are not met in full.

DHCD typically uses a regulatory agreement and/or a deed of trust which are recorded to enforce rent and occupancy agreements. Covenants and deed restrictions may be suspended upon transfer by foreclosure or deed-in-lieu of foreclosure.

Amount of HOME funds	Affordability Period
Under $15,000	5 years
$15,000-$40,000	10 years
Over $40,000	15 years

Affordable Rental Housing

- The rental property owner must comply with the HOME requirements, including rent limits, tenant income limits, tenant lease protections, affirmative marketing, and property standards;
- Affordability requirements apply without regard to the term of any mortgage or loan, or transfer of ownership;
- Throughout the period of affordability, income eligible households must occupy the assisted units;
- When designated rental units become vacant during the period of affordability, subsequent tenants must be income eligible and must be charged the applicable rent.

Affordable Homeownership Housing

As defined by HOME regulations, affordable housing for homeownership is single-family housing that is a 1- to 4-unit residence, a condominium unit, a cooperative unit, a combination of manufactured home and lot, or a manufactured home lot. HOME-assisted homeownership housing must meet a period of affordability based on the amount of HOME funds invested in the project. The minimum periods of affordability per unit are as shown in the table below:

If the homeowner does not maintain principal occupancy during the entire affordability period, Howard County will recapture the federal funds associated with the unit. Howard County must ensure that 100% of all HOME funds made available during a program year that are invested in homeownership projects benefit households defined as low- income by HUD.

Down payment Assistance- HOME Program funds could be used as down payment and closing cost assistance for income eligible households to purchases single family dwelling units. [EXPAND]

21. HOME Program- Tenant Leases

DHCD's HOME Program Specialist reviews each project's lease and tenant selection plan to ensure HOME compliance. Any agency, non-profit or sub recipient receiving HOME Program funds must enact specific tenant protections; some of which are outlined below.

Leases must be for not less than one year, unless by mutual agreement between the tenant and the owner. The Department will review the lease term on a case by case basis.

Leases may not contain any of the following provisions enumerated at 24 CFR 92.253:

1. Agreement by the tenant to be sued, to admit guilt, or to a judgment in favor of the owner in a lawsuit brought in connection with the lease;
2. Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties. However, the owner may dispose of personal property left by a tenant in accordance with state law;
3. Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent;
4. Agreement of the tenant that the owner may institute a lawsuit without notice to the tenant;
5. Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties;
6. Agreement by the tenant to waive any right to a trial by jury;
7. Agreement by the tenant to waive the tenant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease; and
8. Agreement by the tenant to pay attorney's fees or other legal costs even if the tenant wins in a court proceeding by the owner against the tenant. The tenant, however, may be obligated to pay costs if the tenant loses.

LEASE TERMINATION POLICIES

An owner may not terminate or refuse to renew the lease except for the following reasons:

- Serious or repeated violation of the terms and conditions of the lease;
- Violation of applicable federal, state, or local law;
- Completion of the tenancy period for transitional housing; and
- Good cause.

To terminate or refuse to renew tenancy, the owner must serve written notice specifying the grounds for the action at least 30 days before the termination of tenancy.

TENANT SELECTION POLICIES

An owner of rental housing must adopt written tenant selection policies and criteria that:

- Are consistent with the purpose of providing housing for very low-income and low- income families;
- Are reasonably related to program eligibility and the applicants' ability to perform

the obligations of the lease;

- Provide for the selection of tenants from a written waiting list in the chronological order of their application, insofar as is practicable; and
- Give prompt written notification to any rejected applicant of the grounds for any rejection.
- Are consistent with the purpose of providing housing for very low-income and low-income families.
- Are reasonably related to program eligibility and the applicants' ability to perform the obligations of the lease.
- Provide for the selection of tenants from a written waiting list in the chronological order of their application, insofar as is practicable.
- Give prompt written notification to any rejected applicant of the grounds for any rejection.

22. Tenant Based Rental Assistance (TBRA)

Tenant based rental assistance is a rental subsidy that can be used to help individual households afford housing costs such as rent and security deposits. TBRA may also assist tenants with utility deposits, but only when HOME Program funds are also used for rental assistance or security deposits.

For each HOME allocation, 90% of the occupants of HOME assisted rental units and households assisted with HOME funded TBRA must have incomes that are 60% or less of the area median. TBRA programs require annual re-certification of income.

For TBRA programs, source documentation is required for initial and all subsequent income verifications. For rental projects, the requirement for annual income re-certification can be fulfilled with tenant self- certification. Self-certification must include a statement that provides the family's annual income and family size, along with a certification that the information is complete and accurate. The certification must state that the family will provide source documents upon request. Income must be verified with source documentation every fifth year.

23. Rental Housing Policies

General Program Rules

Before any funds are released, an agreement will be signed between DHCD and the recipient. The agreement will satisfy Federal requirements and establishes the terms under which the funding is being provided. Funds will not be released until a funding agreement

is executed.

Funding Agreements will establish a minimum affordability period that is typically not less than 5 years and will at minimum meet the HOME guidelines for new construction. DHCD wants to ensure a permanent stock of affordable housing and may require longer affordability periods than is required by HUD regulations.

Project funding will be limited to the amount necessary to facilitate completion of the project and will not exceed a proportionate share of costs in a project with floating units. All costs must be in direct relation to DHCD assisted units and supporting documentation of all expenditures is required for all costs being paid for with the DHCD funding. With the exception of acquisition and financing costs, DHCD funds are available as reimbursement for eligible expenses. Documentation must be provided for any cost re-imbursement.

Eligible Property Types

HOME rental projects may be one or more buildings on a single site, or multiple sites that are under common ownership, management and financing. The project must be assisted with HOME funds as a single undertaking. The project includes all activities associated with the site or building.

HOME funds may be used to assist mixed-income projects (but, only HOME-eligible tenants may occupy HOME-assisted units). Transitional as well as permanent housing projects, including group homes and Single Room Occupancy (SRO) projects, are allowed. There are no preferences for project or unit size or style. For group homes, the rent for the project is based on the number of bedrooms in the project which is then split (pro-rata) share between tenants.

Properties previously financed with HOME during the affordability period cannot receive additional HOME assistance unless assistance is provided during the first year after project completion. HOME funds may not be used for operations or modernization of public housing projects financed under the Housing Act of 1937. DHCD will not fund these ineligible property types.

Determining HOME-Assisted Units

The HOME Program distinguishes between the units in a project that have been assisted with HOME funds and those that have not been assisted. This distinction between HOME-assisted and unassisted units allows HOME funds to be spent on mixed-income projects while still targeting HOME dollars only to income-eligible households. HOME may only pay actual costs of HOME-assisted housing. The HOME rent and occupancy rules apply only to HOME-

assisted units. In general this designation will be based on the actual HOME investment in a unit or project. The number of HOME-assisted units in a project must be specified in the HOME Loan Agreement or Regulatory Agreement. HOME rules create a floor for the number of HOME-assisted units a project must have which is based on the proportional share of total eligible costs to be paid with HOME funds. Howard County DHCD may require a higher number of HOME-assisted units in a project. Some projects may consist of only HOME-assisted units.

Fixed and Floating Units

For properties with both assisted and non-assisted units, DHCD specifies in the HOME Agreement whether the units are "fixed" or "floating". This designation cannot be changed after the initial contract has been executed.

a) Fixed

When HOME-assisted units are "fixed," the specific units that are HOME-assisted (and, therefore, subject to HOME rent and occupancy requirements) are designated and never change. Designating fixed units allows the project to have a composition of HOME-assisted units by unit size (number of bedrooms) that varies from the composition of non-HOME assisted units by unit size (number of bedrooms). In other words, a project with two three-bedroom units and three four- bedroom units could "fix" one three-bedroom unit and one four-bedroom units as HOME-assisted.

b) Floating

When HOME-assisted units are "floating," the units that are designated as HOME-assisted may change over time as long as the total number of HOME- assisted units in the project remains constant. HOME-assisted floating units must represent the same percentage of all comparable unit sizes in the project. In other words, a project with two three-bedroom units and four four-bedroom units could "float" one three-bedroom unit and two four-bedroom units (thus "floating" fifty percent of each unit size in the project.

The floating designation gives the owner some flexibility in assigning units, and can help avoid stigmatizing the HOME-assisted units. If the floating designation is used, the owner must ensure that the HOME-assisted units remain comparable to the non-assisted units over the affordability period in terms of size, features and number of bedrooms.

Maximum Purchase Price

Housing purchased with HOME funds must be modest housing as defined by HUD in the HOME Program regulations. In the case of acquisition of newly constructed housing or existing housing, the housing must have a purchase price for the particular type of single-family housing to be purchased that does not exceed 95% of the median purchase prices for the

area. Howard County will ascribe to the maximum purchase price as established from HUD's for the Baltimore-Towson MSA as follows:

- When HOME funds are used to build or to acquire newly constructed housing or standard housing for homeownership, the housing must have a purchase price for the type of single family housing that does not exceed 95 percent of the median purchase price for the area. [92.254(a)(2)(i)]
- When HOME funds are used to acquire housing with rehabilitation for homeownership, the housing must have an estimated property value after rehabilitation that does not exceed 95 percent of the median purchase price for the area. [92.254(a)(2)(ii)]

- When HOME funds are used to rehabilitate housing which is currently owned by a family, the housing must have an estimated property value after rehabilitation that does not exceed 95 percent of the median purchase price for the area. [92.254(b)(1)]

Note: Every homebuyer must receive homebuyer counseling.

24. Financial Management

Howard County requires all subrecipients to comply with the requirements and standards of OMB Circular 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles and Audit Requirements", as applicable. These principles shall be applied for all costs incurred whether charged on a direct or indirect basis. Additionally, as part of these requirements all subrecipients must conduct annual audits. Refer to Section 33 of this document for more details on the Single Audit Requirements required of non-federal entities.

DHCD operates on a fiscal year of July 1through June 30. Planning for each fiscal year begins the previous January with requests for proposals released and due in February. Funds are estimated to be available after July 1st, with the understanding that no contracts/agreements can be executed until DHCD has executed funding agreements with HUD, which could be as late as September of the fiscal year.

25. Administration and Monitoring

Amending Documents

HOME loan agreements are fully executed between the County and the project prior to a

project's set- up in IDIS and any HOME funds being disbursed. Loan agreements may be amended by mutual agreement of the parties for changes in terms, for the receipt of additional funds, or changes in project scope. However, agreements will be automatically amended if so required to ensure compliance with regulations.

OTHER DOCUMENTS

Other types of documents may be executed as conditions of funding and may include mortgage and loan agreements, deed restrictions and other use agreements between Howard County and the owner, property management agreements between the owner and property manager, and asset management agreements between the owner and asset manager.

Examples include:

- Mortgage and loan documents are signed at closing and contain the financial terms and conditions of the loan;
- Deed restrictions and other use agreements will be used to place specific restrictions on the property; and
- Property management agreements detail the specific responsibilities of the property manager.

Copies of management agreements executed assigning the management responsibility of DHCD funded projects must be provided to DHCD prior to the release of retention or within 15 days of execution, whichever is later.

MONITORING

The development process will be monitored by DHCD staff through the draw process, including reviewing draw or reimbursement requests, cost estimates, construction contracts and construction documents. PJs must also conduct construction progress and final inspections to ensure that the work is done appropriately.

The initial monitoring, completed upon lease-up, includes reviewing 100 percent of client files and inspecting 15 to 20 percent of assisted units.
During the affordability period the project will be inspected and monitored annually for compliance with funding requirements, which will include a review of management processes, a file review, and a physical inspection of the property and assisted units. HOME During the affordability period all assisted units must be in compliance with rent and income limits DHCD requires that agencies submit a Rental Housing Project Compliance Report annually until the end of the project's affordability period, submit an annual certification that the project and its units are suitable for occupancy,and submit rents for approval.

Also, annually, the PJ must examine the financial condition of HOME-assisted rental projects with 10 or more HOME-assisted units to determine the continued financial viability of the project.

After the HUD-required affordability period ends, the Federal HOME requirements no longer apply.

HOME properties will be monitored in according to the total number of units in a project as follows:

Number of Units	Inspection Required	Units Inspected
1 to 4	Every 3 years	100%
5-25	Every 2 years	20% or 4 HOME units minimum
26 or more	Annually	20% or 4 HOME units minimum

Note: DHCD reserves the right to inspect the properties more frequently than the HOME rule requires

Grantees are expected to keep adequate records to document and demonstrate compliance of all requirements including:

- The project is Affirmatively Marketed to qualified applicants;
- The Affirmative Marketing Plan must be in place and reviewed;
- Tenants are screened for eligibility;
- Rent and occupancy targets are observed;
- Adequate property maintenance is conducted; and
- Proper internal controls and financial management

26. Community Housing Development Organizations (CHDOs)

A Community Housing Development Organization (CHDO) is a private non-profit, community-based service organization that has obtained or intends to obtain staff with the capacity to develop manage and/or sponsor affordable housing. Further information on the regulations regarding CHDOs, can be found in the Code of Federal Regulations Title 24 at Part 92.300.

Regulatory Requirements for CHDO Certification

In order to receive HOME funding under CHDO guidelines, an organization must:

- Submit a complete application with up to date supporting documentation to the County for every project that the CHDO seeks funding for;
- Receive certification approval from the County;
- Demonstrate a history of serving the community and have a clearly defined geographic service area;
- Document that at least one-third of its governing board is composed of residents of low-

income neighborhoods or elected representative of low-income neighborhood organizations;

- Organized under State/Local Law: The nonprofit organization must show their articles of incorporation as evidence of being organized under state and local law;
- IRS Nonprofit Status: Organizations must have a 501(c) (3) non-profit status of exemption letter of certification from the Internal Revenue Service (IRS);
- Purpose of Affordable Housing: Providing decent and affordable housing must be the organization's primary purpose as evidenced by the organization's Charter, Articles of Incorporation, By-laws or a Resolution of the CHDO's board of directors;
- Service Area: The organization's service area must be Howard County or a smaller area within Howard County and this must be in its Articles of Incorporation and/or By-laws; a map of the service area must be attached to the organization's CHDO application;
- Board Representation: The board of directors must contain no more than 1/3 representation from the public sector and a minimum of 1/3 representation from the low- income community it serves;
- For-Profit Sponsorship: CHDOs may be sponsored by for-profits; however, the CHDO cannot be controlled by the for-profit and must be free to contract for goods and services. The primary purpose of the for-profit cannot be housing ownership/management as evidenced by the for-profit's Articles of Incorporation. For profit organizations and/or their appointees can only make up 1/3 of the board of directors, but they cannot serve as officers or employees of the CHDO (2013 Rule).
- If sponsored by a religious organization, the CHDO must be a separate secular entity from the religious organization, with membership available to all persons, regardless of religion or membership criteria, as evidenced by by-laws, charter, or articles of incorporation;
- Low-Income Input: A formal process that is described in the By-laws or Resolutions has been established and implemented for low-income program beneficiaries from the organization's service area to advise the organization in all of its decisions regarding affordable housing projects;
- Serving the Community: A minimum of one year of relative experience serving the community where the organization intends to develop affordable housing must be demonstrated. This must be demonstrated via letters of community support and a narrative description of the organization's community activities;
- Accounting Standards: The organization must meet and adhere to financial accountability standards found in 24 CFR 84.21;
- Organizations having revenues in excess of $300,000 MUST submit an audit performed by a Certified Public Accountant, along with their most recently filed IRS Form 990. Organizations having income less than $300,000 MUST submit the most recently filed IRS Form 990; and
- Benefit No Individual: No part of the CHDO's profits may benefit any members, founders, contributors, or individuals. This requirement must be in the Articles of Incorporation.

CAPACITY AND EXPERIENCE

To qualify as a CHDO, the 2013 Rule requires that a nonprofit have paid employees with housing experience appropriate to the role the nonprofit expects to play in projects (i.e., developer, sponsor, or owner) in order to receive a CHDO designation.

Note: the definition of "owner" has been significantly revised in the 2013 Rule at 92.300. The Rule now permits a CHDO to own and operate housing that it does not develop. Therefore, a nonprofit that will undertake development activities must demonstrate development capacity. A nonprofit that will undertake property ownership and management must demonstrate ownership/management experience.

The requirement for development capacity can no longer be demonstrated through the use of consultants with development experience, except during the first year of operation as a CHDO, provided that the consultant trains the CHDO staff.

In addition, the capacity requirements cannot be met through the use of volunteers of staff that is donated by another organization. Consultants or volunteers can continue to fill occasional skill gaps or undertake activities that are required only on a periodic basis (e.g., project underwriting), but cannot be the basis of a determination that a nonprofit has the capacity to be designated as a CHDO.

Per HOME regulations funding is set aside for CHDO use as follows:

- 15 percent of total HOME funding allocation is reserved for CHDOs to develop, sponsor or own housing (Up to 10 percent of this 15percent may be used for project specific assistance; see additional information at Title 24 Section 92.301); and
- Up to 5 percent of the total HOME funding allocation can be used directly for operating expenses for a CHDO per fiscal year, contingent upon the CHDO entering an agreement to use HOME funds to develop, sponsor or own housing within 24 months.

HOWARD COUNTY REQUIREMENTS FOR CHDO CERTIFICATION

In addition to the regulatory requirements from HUD, Howard County has established additional criteria for CHDO certification. The organization must:

- Maintain a record of good standing with the Maryland Secretary of State's Department of Assessment and Taxation Office
- Maintain no history of awarded CHDO funding being de-obligated or significant compliance findings on its Howard County funded projects.

The criterion above is not all-inclusive and Howard County may require additional information prior to determining CHDO certification. Meeting the above requirements does not guarantee CHDO certification and/or CHDO funding. Howard County reserves

the right to deny or revoke CHDO certification based on its evaluation of the organization's performance.

PROJECT DEVELOPMENT USING CHDO SET-ASIDE

A certified CHDO must be an owner, developer or sponsor of a HOME-eligible project to use CHDO set-aside funds. A CHDO may serve in one of these roles or in a combination of roles, such as being owner and developer.

OWNER OF RENTAL HOUSING

The CHDO is required to own (in fee simple absolute or long-term ground lease) multifamily or single family housing that is rented to low-income families. The CHDO must own the HOME project during development and throughout the period of affordability, and is required to oversee all aspects of the development process. At a minimum, the CHDO can own the property and hire a project manager or contract with a development contractor to oversee all aspects of the development.

Under the 2013 Rule at 92.300(a)(2), a CHDO is also permitted to acquire housing that is in standard condition provided it owns the housing throughout the affordability period.

- This new definition facilitates participation of community-based nonprofit organizations that have the capacity to own and operate affordable rental housing in their community, but do not have the capacity to develop such housing; and
- Consequently, this new definition creates additional opportunities for nonprofits organizations to access the CHDO set-aside funds to address their neighborhoods' affordable housing needs.

DEVELOPER OF RENTAL HOUSING

A CHDO that is a "developer" of rental housing is the owner (in fee simple absolute or long-term ground lease) and developer of the project and must be in sole charge of all aspects of the development process, including obtaining zoning, securing non-- HOME funds, selecting contractors, overseeing the progress of work, and determining reasonableness of costs. The CHDO must own the HOME-assisted housing during the development process and throughout the period of affordability.
This is a change from the pre-2013 Rule in that the CHDO must own the property; it no longer has the option to be under contract with an owner to develop the property.

SPONSOR OF RENTAL HOUSING

The 2013 Rule provides two definitions of a "sponsor" of HOME-assisted rental housing:

- 92.300(a)(4) clarifies the requirements for CHDOs to maintain effective project control

when acting as "sponsor" of rental housing. A CHDO "sponsors" rental housing when the property is "owned" or "developed" by:

a. A subsidiary of the CHDO (in which case the subsidiary, which may be a for-profit or nonprofit organization, must be wholly owned by the CHDO);

b. A limited partnership (in which the CHDO or its wholly owned subsidiary must be the sole general partner); or

c. A limited liability company (in which the CHDO or its wholly owned subsidiary must be the sole managing member).

If the limited partnership or limited liability company agreement permits the CHDO to be removed as sole general partner or sole managing member, respectively, the agreement must require that the removal be "for cause" and that the CHDO must be replaced by another CHDO. In addition, HOME funds must be provided to the entity that owns the project.

92.300(a)(5) codifies the pre-2013 Rule definition of "sponsor." It states that a CHDO also "sponsors" HOME-assisted rental housing in situations in which the CHDO owns and develops the housing and agrees to convey the housing to a private nonprofit organization (that does not need to be a CHDO but cannot be created by a governmental entity) at a predetermined time after completion of the project development.

- Such arrangements typically occur when a CHDO has development expertise and the nonprofit organization has the capacity to own and operate the housing.
- The CHDO is required to own the property before the development phase of the project and is required to select the nonprofit organization before entering into an agreement with the PJ that commits HOME funds to the project.
- The nonprofit organization assumes the CHDO's HOME obligation (including any repayment of loans) for the project.
- If the property is not transferred to the nonprofit organization, the CHDO sponsor remains liable for the HOME assistance and the HOME project.

DEVELOPER OF HOUSING FOR HOMEOWNERSHIP

For HOME-assisted homebuyer projects, the housing is "developed" by the CHDO if it is the owner (in fee simple absolute) and developer of new housing that will be constructed or existing substandard housing that is owned or will be acquired by the CHDO and rehabilitated for sale to low-income families in accordance with Part 92.254.

- To be the "developer," the CHDO must arrange financing for the project and be in sole charge of construction. As part of its set-aside funds, the CHDO can provide direct down payment assistance to a buyer of the housing it has developed with HOME funds in an amount not to exceed 10 percent of the amount of HOME development funds. In this role, the CHDO is not a subrecipient.

Note: Every homebuyer must receive homeowner housing counseling.

SET-ASIDE REQUIREMENT FOR CHDOS

Within 24 months after the date that HUD notifies the participating jurisdiction of HUD's execution of the HOME Investment Partnerships Agreement, the participating jurisdiction must reserve not less than 15 percent of the HOME allocation for investment only in housing to be owned, developed or sponsored by community housing development organizations.

- Howard County must certify the organization meets the definition of a "community housing development organization" and must document that the organization has capacity to own, develop, or sponsor housing each time it commits funds to the organization.
- Note on reserving: Funds are allowed to be committed, or reserved, when Howard County has a fully executed written agreement with the CHDO (or project owner as described paragraph 92.300(a)(4) of this section) committing the funds to a specific local project in accordance with
- paragraph (2) of the definition of "commitment" in § 92.2.

AGREEMENT REQUIREMENTS

- The written agreement between Howard County and the CHDO must state the actual sales price of the housing or describe the method that will used to determine the sales price
- The written agreement must state whether the proceeds of the sale must be returned to the County, retained by the CHDO, and whether the proceeds must be used for HOME-eligible activities or other housing activities in accordance with 92.503.

Note: Funds that are recaptured during the period of affordability because housing no longer meets the affordability requirement under 92.254(a)(5)(ii) must be reinvested in HOME-assisted activities in accordance with Part 92.503.

ELIGIBLE AND INELIGIBLE USES OF CHDO SET-ASIDE FUNDS

A. CHDO acting as owner, sponsor or developer may use the 15 percent CHDO set-aside for the following activities:

- Acquisition and/or rehabilitation of rental or homebuyer property;
- New construction of rental or homebuyer property; and
- Direct financial assistance to homebuyers of HOME-assisted property developed or sponsored by the CHDO.

CHDO set-aside HOME funds must be used during the construction or rehabilitation of the property.

B. Ineligible CHDO Activities - Ineligible uses of the HOME CHDO set-aside are homeowner rehabilitation, tenant-based rental assistance (TBRA), and down payment and/or closing cost assistance to purchasers of housing not developed with HOME CHDO funds.

C. Operating Assistance – Howard County may choose to use up to 5 percent of its annual HOME allocation to provide funds for CHDO operating assistance. This allocation does not count toward the 15 percent set-aside funds used by CHDOs for projects. To be eligible for CHDO operating assistance, the CHDO must submit a funding application for a CHDO-eligible project and the funding must be available. Howard County is not required to provide operating assistance.

LIMITATIONS ON CHDO OPERATING FUNDS:

CHDO operating assistance may not exceed $50,000 each fiscal year, or fifty percent (50%) of CHDO's total annual operating expenses for that year, whichever is greater.

Operating funds are provided on a year-by-year basis provided funds are available and the organization has acceptable performance in the community. A certified copy of the CHDO's most recent operating budget must be submitted to Howard County to determine amount of assistance.

Howard County reserves the right to delay payment of operating funds if it is evident that the CHDO project is experiencing delays. Howard County reserved the right to reduce the amount of or not award operating assistance based on its evaluation of the CHDO's production and/or overall performance.

Eligible operating expenses (must be reasonable and necessary) are:

- Salaries, wages, benefits, and other employee compensation;
- Employee education, training and travel
- Rent and utilities;
- Communication costs;
- Taxes and insurance; and
- Equipment, materials, and supplies.

REPORTING REQUIREMENT

Howard County will periodically evaluate the performance of any CHDO wishing to receive CHDO operating funds. When receiving operating funds, monthly performance reports are required. The reports must include information about the following:

- A report on the community involvement and participation in the CHDO with regard to beneficiaries of the projects as well as partner organizations and other entities involved in serving low-and moderate-income households; and
- A description of what the receipt of the CHDO operating funds has enabled the CHDO to accomplish that would otherwise have been unable to achieve and a detailed narrative of specific uses of the CHDO operating funds.

Technical Assistance Available to CHDOs

Staff members are available to assist CHDOs in structuring project proposals to best meet program requirements as well as to assist CHDOs in implementing these projects once they are funded.

Nonprofits (including CHDOs) may also be eligible to receive technical assistance from other organizations including:

- Training and Development Association;
- Maryland Department of Housing and Community Development; and
- HUD Baltimore Field Office.

27. Other Federal Requirements

For all HUD programs, there are many other requirements that must be met in addition to the specific HOME program requirements. Those who receive HOME funds must comply with these requirements. The description and checklist of other federal requirements below is not all-inclusive. Applicants should refer to the HOME regulations for a complete list of other federal requirements.

Non-Discrimination and Equal Access Rules / Fair Housing and Equal Opportunity

Yes, must affirmatively further Fair Housing. Particular attention should be paid to signs of discrimination in leasing practices.

Regulatory Citations & References:

- 92.202 and 92.250
- Title VI of Civil Rights Act of 1964 (42 U. S. C. 2000d et. seq.)
- Fair Housing Act (42 U. S. C. 3601-3620)
- Executive Order 11063 (amended by Executive Order 12259)
- Age Discrimination Act of 1975, as amended (42 U. S. C. 6101) o
  24 CFR 5.105(a)

Affirmative Marketing and Minority Outreach

All rental or homebuyer projects with HOME assisted housing units must adopt affirmative marketing procedures and requirements. Howard County has adopted and follows affirmative marketing procedures and requires all our subrecipients and property owners to follow as well.

Agreement Requirement - all written agreements with subrecipients; and owners, developers, or sponsors, in accordance with §92.504(c), must include the affirmative marketing requirements.

With the 2013 HOME Rule, §92.351 was revised to extend the applicability of affirmative marketing procedures to all HOME-funded programs, including TBRA and down-payment assistance programs. The pre-2013 affirmative marketing requirements were applicable only to HOME-assisted projects with five or more HOME units.

- The previous exception to the affirmative marketing requirements for tenants receiving Section 8 rental assistance has been eliminated.
- The specific affirmative marketing procedures to be used will depend on the type and size of the program or project. For instance, a PJ administering a down-payment assistance program must affirmatively market the program (i.e., the availability of federal funds for down-payment assistance), rather than units available for purchase.

Regulatory Citations & References: Section 92.351

Affirmative Marketing

Howard County's DHCD is committed to affirmatively furthering fair housing by promoting fair and equal access to housing for persons residing in Howard County without regard to race, color, national origin, religion, age, gender, familial status, income or disability. This commitment extends to all housing projects and programs supported by grant funds. To further affirmatively fair housing, DHCD is actively participating in the Regional Fair Housing Group hosted by the Baltimore Metropolitan Council (BMC) in creating a fair housing plan for all its housing related programs. In order to affirmatively further fair housing the following practices should be implemented:

1. Include HUD-approved "Equal Housing Opportunity" logo in solicitation and advertising the availability of Housing Projects, Programs and forms;
2. Analyze demographic data of housing activities and identify potential tenants and homebuyers who are least likely to apply to rent or purchase housing;
3. Conduct outreach and make contact with organizations whose clientele consists primarily of diverse and underserved populations;

4. Publicize the availability of housing opportunities to minorities by utilizing media normally accessed by minorities, including newspaper advertisements, public service announcements, distribution of fair housing brochures at community events, community-based presentations, and other appropriate outreach activities designed to inform the public about fair housing rights and responsibilities;

5. Provide on-going training on local, state and federal fair housing laws to all County's staff and non-profit and for-profit housing partners involved in the development and maintenance of HOME-assisted rental units;

6. Create information on fair housing policies, practices, and procedures for Renters and Homebuyers and post on the County's website; and

7. Collect, analyze and report on information of the race and ethnicity of the individuals who have applied to purchase or rent units at the project, in order to determine the results of the affirmative marketing efforts.

Rental & Homebuyer:

Howard County will adopt affirmative marketing requirements for all rental projects with five or more HOME units and for all HOME- funded programs per §24 CFR92.351. Any entity applying for HOME program funds for rental housing-related activities must adopt affirmative marketing procedures for all HOME-assisted housing and submit for review the Affirmative Marketing Plan along with HOME program application. An approved Affirmative Marketing Plan and compliance with HOME-assisted housing requirements must be in place prior to the disbursement of HOME program funds.

Affirmative marketing requirements include:

1. A description of what owners and/or the program administrator will do to affirmatively market housing assisted with HOME program funds;

2. A description of what owners and/or the program administrator will do to inform persons least likely to apply for housing without special outreach;

3. Maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness; and

4. A description of how efforts will be assessed and what corrective actions will be taken when requirements are not met.

The County will take an assessment of the most commonly spoken languages in the County and provide marketing materials and correspondence in the most dominant languages.

PROJECTS WITH TENANT PREFERENCES

The HOME 2013 Rule further modified the requirements to specify that to the extent that a project is implementing tenant preferences, the PJ must have affirmative marketing procedures that apply in the context of limited/preferred tenant selection policies.

For example, a project for homeless persons must be marketed to the universe of persons who would meet the preference. The project could not rely solely on referrals from a specific homeless provider when there are other homeless providers with potential applicants in the market area.

Owners of Rental Property

Howard County Department of Housing and Community Development mandates the owner of the rental property with HOME assisted units must adopt an affirmative marketing policy and procedure acceptable to the County to ensure that eligible persons regardless of race, color, national origin, sex, religion, and familial status are adequately informed of the services they provide as described in 24 CFR 92.351 (a). The Rental Property Owner's adopted Plan must be approved by DHCD staff and by HUD's Fair Housing Program Center.

Affirmative Marketing Procedures Must Include the Following Elements:

- Methods for informing the public, owners and potential tenants about fair housing laws and the grantee's policies (for example: use the Fair Housing logo or equal opportunity language).
- A description of what owners and/or the grantee will do to affirmatively market housing assisted with HOME funds, and maintenance of records that document the actions taken in this marketing effort.
- A description of persons not likely to apply for housing without special outreach and on what basis the owners and/or the grantee made this determination.
- A description of what owners and/or the grantee will do to inform persons not likely to apply for housing without special outreach, and maintenance of records that document the actions taken in this marketing effort.
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met, and maintenance of records that document an assessment of the effectiveness of the marketing effort.

Accessibility

Regulatory Citations & References:

- Section 504 of the Rehabilitation Act of 1973 (implemented at 24 CFR Part 8)
- For multi-family buildings only, 24 CFR 100.205 (implements Fair Housing Act)

Employment and Contracting Rules

Equal Opportunity Employment -Yes, contracts and subcontracts for more than $10,000 must include language prohibiting discrimination.

Regulatory Citations & References:

- Executive Order 11246 (implemented at 41 CFR Part 60)

Section 3 Economic Opportunity

Federal regulations require that to the greatest extent possible the benefits of federal financial assistance will be directed to very low- and low-income persons, particularly those who are recipients of government assistance for housing and to business concerns which provide economic opportunities to very low- and low-income persons. However, Section 3 only applies to new employees hired as a result of the federal assistance. If a contractor or subcontractor performs the work with existing employees, Section 3 requirements do not apply to the contract. Contracts and subcontracts funded in whole or in part by HUD resources where the individual contract or subcontract exceeds $100,000 and the amount of the HUD assistance for the project exceeds $200,000 are subject to Section 3 requirements. Both dollar thresholds must be present to trigger Section 3. Contracts exclusively for supplies or materials are excluded unless the contract includes installation of the materials.

Section 3 Activities Include:

- Housing rehabilitation, including reduction and abatement of lead-based paint projects; housing construction; and
- Other public construction assisted with housing or community development funds.
- HUD has established goals and actions to be taken in awarding contracts to Section 3 businesses
- 10 percent of the total dollar amount in contract for building trades work arising in connection with housing rehabilitation and housing construction;
- 3 percent of the total dollar amount of all other Section 3 covered contracts;
- Notify Section 3 businesses of the contracting opportunities covered by these requirements;
- Notify all potential contractors of the Section 3 covered contracting requirements, and include the Section 3 clause in all contracts;
- Assist and "actively" cooperate with HUD in obtaining contractor/subcontractor compliance with Section 3 requirements;
- Refuse to award a contract to any contractor who has been found to have violated the Section 3 regulations;
- Take remedial action against contractors who fail to comply with the Section 3 requirements (e.g. termination); and

➢ Document actions (including results and impediments) taken to comply with Section 3 requirements.

Projects will have to report to DHCD on how they are meeting Section 3 requirements.

MINORITY/WOMEN EMPLOYMENT

Howard County Housing has adopted the MBE/WBE language of Howard County when related to HOME Rental Program. The Owner of the HOME assisted Rental Property will follow the specific Procurement Guidelines and Procedures related to MBE and WBE beginning on page 73 of the County Manual.

Regulatory Citations & References:

- Executive Orders 11625, 12432 and 12138
- 24 CFR 85.36(e)

DAVIS-BACON

Yes, if construction contract includes 12 or more units that are HOME-assisted.

Regulatory Citations & References:

- 92.354 Davis-Bacon Act (40 U. S. C. 276a -276a-5) o 24 CFR Part 70 (volunteers)
- Copeland Anti-Kickback Act (40 U. S. C. 276c)

CONFLICT OF INTEREST

The conflict of interest provisions at §92.356(f)(1) prohibit certain persons from occupying HOME-assisted housing. This provision has been revised with the 2013 HOME Rule to clarify that immediate family members of an officer, employee, agent, elected or appointed official or consultant of an owner, developer, or sponsor are prohibited from occupying a HOME-assisted affordable housing unit in a project. This amendment further clarifies that the restriction on occupancy applies during the period of affordability only, and not to the entire period of ownership by the entity that received the HOME assistance.

Regulatory Citations & References:

- 24 CFR 92.356
- 24 CFR 85.36
- 24 CFR 84.42

DEBARRED CONTRACTORS

DHCD staff ensures that no contractor working on a HOME project is debarred, suspended, or ineligible per the requirements of 24 CFR part 24. If the amount of

assistance exceeds $200,000 OR contract or subcontract exceeds $100,000.

Regulatory Citations & References:

- Section 3 of the Housing and Urban Development Act of 1968 (implemented at 24 CFR Part 135)

Yes, check HUD's list of debarred contractors.

Regulatory Citations & References: 24 CFR Part 5

ENVIRONMENTAL REVIEWS

Projects funded with HOME must examine the environmental impacts of each activity as required by the National Environmental Policy Act of 1969 (NEPA) and other environmental requirements. The cost of the environmental assessment is an eligible project-related soft cost and may be paid for with HOME funds. A full explanation of the NEPA requirements can be found in the HOME regulations in section 92.352. DHCD will ensure environmental reviews are completed prior to commitment of HOME funds.

Regulatory Citations & References:

- 24 CFR 92.352
- 24 CFR Part 58.35 b(5)
  - National Environmental Policy Act (NEPA) of 1969

FLOOD INSURANCE

Yes, must obtain flood insurance if located in a FEMA designated 100-year flood plain. Community must be participating in FEMA's flood insurance program.

Regulatory Citations & References:

- Section 202 of the Flood Disaster Protection Act of 1973 (42 U. S. C. 4106)
-

SITE AND NEIGHBORHOOD STANDARDS

- Yes, for new construction only.

- Regulatory Citations & References: 24 CFR 893.6(b)

LEAD-BASED PAINT

Housing that is purchased, rehabilitated or assisted in some way with HOME is subject to

the Lead-based Paint Poisoning Prevention Act, the Residential Lead-based Paint Hazard Reduction Act and the implementing regulations for these Acts. HUD maintains a website for the Office of Healthy Homes and Lead Hazard Control where lead-based paint requirements are described as they apply to HUD programs.

Applicants for HOME funds should discuss acquisition projects where units that are older than 1978 are being purchased with DHCD prior to purchase. Lead paint was used in all residential paints prior to 1978. Testing for lead, an assessment of its presence, and a plan for stabilization or removal will be required if HOME funds are used to acquire pre-1978 units. Requirements differ depending on whether rehabilitation work is performed. Rehabilitation notices to owners. Paint testing of surfaces to be disturbed. Risk assessment, if applicable, based on level of rehabilitation assistance. Appropriate level hazard reduction activity (based on level of rehabilitation assistance). Safe work practices and clearance. Provisions included in all contracts and subcontracts.

Regulatory Citations & References:

- 92.355
- Lead Based Paint Poisoning Prevention Act of 1971 (42 U. S. C. 4821 et. seq.)
- 24 CFR Part 35
- 982.401(j) (except paragraph 982.401G)(I)(i))

WHAT MUST BE DONE

1. The rules require that a disclosure to all applicants and tenants about any known or potential lead-based paint hazards must be issued; and
2. Documentation of the issuance of the EPA/HUD/Consumer Product Safety Commissions brochure "Protect Your Family from Lead in your Home", and
3. Get a signed copy of the certification of accuracy completed at each initial lease up.

   Note: For any HOME projects involving existing housing/rehabilitation, DHCD will ensure the proper disclosures are provided to applicants and tenants regarding lead-based paint

RELOCATION

It is important that those who receive HOME funds from the County take appropriate steps to minimize the displacement of families, individuals, businesses, nonprofit organizations and farms as a result of the activity being funded with HOME. The requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) guide the steps that must be taken to minimize displacement and the actions taken to compensate those who are displaced by a federally-funded project.

The applicant must fully describe any project activity that may lead to voluntary or involuntary displacement of persons impacted by the proposed project in an application for HOME funding. A timeline for notification of persons who may be impacted is of vital importance and those applying for HOME funds should take no steps that may result in a person relocating involuntarily prior to discussing their application with the County. All required steps must be determined by consulting the Uniform Relocation Act (URA) which can be found in section 92.353 of the HOME regulations.

For voluntary purchases of property, the applicable disclosure must be submitted with an application for funding for any HOME project where the purchase of land is involved. These disclosures must be retyped on the applicant agency's letterhead.

Displacement must be minimized; existing tenants must be provided a reasonable opportunity to lease a dwelling unit in the building upon completion of the project. Reimbursement for temporary relocation, including moving costs and increase in monthly rent/utilities, must be provided, as well as advisory services.
Regulatory Citations & References: 92.353

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U. S. C. 4201-4655)
- 49 CFR Part 24
- 24 CFR Part 42 (subpart B)
- Section 104(d) "Barney Frank Amendments"

Uniform Administrative Requirements

Nonprofit agencies who receive HOME funds are subject to OMB Circular 2CFR Pt. 200, which guides the determination of cost reasonableness, allocation of costs to grant funds, direct vs. indirect costs and allowable costs, etc. Nonprofit agencies must follow 2CFR Pt. 200, when making decisions about eligible and ineligible costs that can be assigned to grant awards.

Audits

Nonprofit agencies that receive federal funds are subject to the audit requirements imposed by OMB Circular 2 CFR Part 200 for nonprofit organizations. Audits must be conducted annually. However, a nonprofit must expend $750,000 or more in federal funds before the Single Audit requirements apply. A copy of the OMB Circular 2 CFR Part 200 can be at: https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200/content-detail.html . More information about the single audit can be found in Section 33 of this document.

PROCUREMENT

Nonprofits that receive federal funds must follow policies that dictate how goods and services are purchased with these funds. The federal regulations published at 24 CPR Part 84 establish the procedures that a nonprofit must follow. One of the most important aspects of the federal procurement regulations is that a nonprofit must have written procedures in place prior to beginning procurement with federal funds. How to develop these policies is described in sections 84.40-84.48. Howard County DHCD is available to assist nonprofits with the development of procurement policies and standards prior to their purchasing goods with federal funds.

Howard County Housing has adopted the Procurement Policy of Howard County when related to the HOME Rental Program. The Howard County Purchasing Manual will be referenced within the HOME Agreement under the Procurement section and attached as an Exhibit to all HOME Rental Grant Agreements. The Owner of the HOME Assisted Rental Property will follow the specific guidelines for all purchases and procurement.

LABOR STANDARDS

For all construction projects that meet established threshold requirements and use federal funds for construction or rehabilitation of units, the project contractor must pay prevailing wages for the area to the trade employees working on the project. DHCD will provide wage determinations from the U.S. Department of Labor for inclusion in all bidding and contractual documents for construction and rehabilitation projects. For HOME projects, if 12 or more units will be developed, prevailing wages must be paid as required by the Davis-Bacon and related wage payment Acts.

28. Property and Other Standards

Housing that is constructed or rehabilitated with HOME funds must meet all applicable local codes, rehabilitation standards, city codes and zoning ordinances at the time of project completion.

- Accessible Units – in HOME properties with 5 or more total units, the common spaces and a certain number of units must be constructed or rehabilitated to be accessible to persons with mobility and/or sensory impairments in accordance with the Section 504 Accessibility - Uniform Federal Accessibility Standard (UFAS). These units must be marketed to ensure that they offered first to persons with disabilities.

SEC. 3.100. - HOWARD COUNTY BUILDING CODE; ADOPTION OF INTERNATIONAL CODES.

(a) In General . Except as amended in sections 3.101, 3.102, 3.103, and 3.104 of this subtitle, the codes enumerated in this section are hereby adopted as the Howard County Building Code as if the codes were set out in full in this section.

(b)

Adopted Code:

(1)

The International Building Code, 2015 Edition, Published by the International Code Council, Inc.

(2)

The International Residential Code for One- and Two-Family Dwellings, 2015 Edition, published by the International Code Council, Inc.

(3)

The International Mechanical Code, 2015 Edition, published by the International Code Council, Inc.

(4)

The International Energy Conservation Code, 2015 Edition, published by the International Code Council, Inc.

(5)

The Life Safety Code, 2015 Edition, published by the National Fire Protection Association.

(6)

The Howard County Electrical Code, adopted pursuant to title 3, subtitle 2 of the Howard County Code.

(7)

The Plumbing and Gas fitting Code for Howard County adopted pursuant to title 3, subtitle 3 of the Howard County Code.

(8)

The Maryland State Accessibility Code.

(9)

The Howard County Sign Code, adopted pursuant to title 3, subtitle 5 of the Howard County Code.

(C.B. 10, 2015, § 1)

PROPERTIES THAT ARE REHABILITATED WITH HOME FUNDS MUST MEET THE FOLLOWING STANDARDS:

- Handicapped accessibility requirements, where applicable;
- Also, one of the following:
  - Local and State Code Requirements
  - Uniform Physical Condition Standards (UCPS) – the UCPS are uniform standards established by HUD for housing that is decent, safe, sanitary, and in good repair per 24 CFR 5.703.

NEW CONSTRUCTION WITH THE USE OF HOME FUNDS MUST MEET THE FOLLOWING STANDARDS:

- Model Energy Code
- Handicapped accessibility requirements, where applicable.
- New construction of rental housing must meet site and neighborhood standards at 24CFR 9 83.6(b)
- Also, one of the following:
  - Local and State Code Requirements
  - International Code Council's International Residential Code
  - International Building Code

ACQUISITION OF EXISTING HOUSING (NO REHAB OR CONSTRUCTION) MUST MEET THE FOLLOWING STANDARDS:

- Applicable local housing quality standards and code requirements.
- Handicapped accessibility requirements, where applicable.
- Uniform Physical Condition Standards (UCPS) - **24 CFR Parts 5 and 200**

To ensure compliance with property and accessibility standards, DHCD development staff and HOME Program Specialist monitor each project during construction. They also review the project construction budget prior to funding the project to ensure that cost estimates are appropriate and review any change orders to ensure cost reasonableness and that HOME funds are only disbursed for eligible costs. In addition, DHCD development staff review work write-ups and plans, prior to construction, in order to confirm they reflect all applicable property standards and codes.

Owners must maintain properties in accordance with property standards throughout the affordability period. DHCD will conduct periodic property inspections as determined by HOME regulations to insure continued compliance.

A. OCCUPANCY STANDARDS

In March, 1991, the Department of Housing and Urban Development (HUD) addressed the issue of occupancy standards in the Keating Memorandum, which states that "...HUD believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act." However, the HUD memorandum goes on to state that a "two people per bedroom" policy may be unreasonably restrictive, depending on other factors, such as the size and number of bedrooms, the overall size of the unit, and other special circumstances. For this reason, caution suggests that housing providers should consider the occupancy standard of two persons per bedroom

plus one or more additional persons, depending on the household's circumstances.

Local code requirements mandate the following in reference to the designation of rooms as a bedroom:

HOWARD COUNTY OCCUPANCY LIMITATIONS

Bedrooms – Every bedroom occupied by one person shall contain at least70 square feet of floor area, and every bedroom occupied by more than one person shall contain at least 50 square feet of floor area for each occupant thereof. Living Room – 3 to 5 occupants must have a minimum of 120 square feet, 6 or more occupants must have a minimum of 150 square feet. Dining Room – 3 to 5 occupants must have a minimum of 80 square feet, 6 or more occupants must have 200 square feet. Combined living room and dining room spaces - If the total area is equal to that required for separate rooms and if the space is located so as to function as a combination living/dining room. There are additional requirements for efficiency Apartment units whose maximum occupancy is 3 persons.

- A den with windows must be treated as a bedroom;
- You must have 70 sq. feet in the bedroom for the first person;
- You must have 50 sq. feet per person for any additional persons using the same room as a bedroom

The Local Code should be consulted for additional requirements.

B. OTHER STANDARDS

The site and neighborhood standards (24 CFR 983.6(b)) apply only to new construction of rental housing. DHCD development staff review each HOME project to ensure it meets the site and neighborhood standards prior to funding.

29. Annual Review and Rents and Income

Howard County will implement a four (4) step process to ensure that rents and income are reviewed annually. The first step would entail sending a reminder on January 01 or the closest work day thereafter to all property managers requesting that a rent and income report be submitted, along with the certification that all units are suitable for occupancy to Howard County Housing. The second step ensures that all reports will be obtained by the HOME Program Specialist no later than January 31st. The report should list the rents, income and family size for ALL HOME assisted units. The third step would entail the HOME Program Specialist reviewing the rents and income in accordance with HOME Program rental affordability requirements and completing checklist 6-D, Project Compliance Report: Rental Housing. A copy of checklist 6-

D is attached for reference (Appendix E). Lastly, a copy of the checklist along with written correspondence and a summary of the review will be placed in the project file and a copy sent to each property manager.

Howard County Housing has also implemented an "Annual Review of Rents and Income" form (Appendix F) for each project file. After each step is completed, HCH staff must initial and upon completion of all four (4) steps, sign and date the form. This process will ensure that rent rolls are being reviewed and reported on annually, and ultimately keeping Howard County in compliance with 24CFR Pt 92.252.

30. Rental Units - Single Family Rental

HOME RENTS

The Home Program restricts the rents for HOME units and the incomes of the tenants in units throughout the affordability period. Every HOME-assisted unit is subject to rent limits designed to help make rents affordable to low income households. These maximum rents are referred to as "HOME Rents." Based on changes in area income levels or market conditions, HOME rents, as calculated by HUD and approved by DHCD, may increase. If a project can and wants to increase HOME rents, official requests must be submitted to Howard County and DHCD must approve prior to implementation.

Tenants must be given at least 30 days written notice before increases are implemented. Any increases are also subject to other provisions of the lease agreements. For example, rents may not increase until the tenant's lease expires.

HOME rents may decrease. While project rent levels are not required to decrease below the HOME rent limits in effect at the time of project commitment, decreasing HOME rents may reflect a change in market conditions that may force owners to reduce rents in order to maintain tenants. DHCD with HUD's approval may permit adjustments to the rent structure if the financial feasibility of the project is threatened. This is important to lenders providing financing to HOME-assisted projects.

There are two HOME rents used in the HOME program:

- High HOME Rents: The maximum amount an owner can collect per month on a "High" HOME-assisted unit
- Low HOME Rents: The maximum amount an owner can collect per month on a "Low" HOME-assisted unit.

A. HOME Rent Limits

It is imperative that grantees understand HOME rent limits as they apply to their project.

DHCD utilizes HUD published Low and High HOME rents limits. HUD's calculation of

Low and High HOME rents assumes the owner pays the utilities. If the tenant pays utilities, the maximum allowable rent that could be collected by the owner would be the applicable Low or High HOME rent minus a utility allowance. DHCD will approve utility allowances on a project by project basis based upon allowances prepared by local utility providers or based on HUD's Utility Schedule Model. The HOME rent limits restrict the maximum total rent (minus the utility allowance) that can be received by project owners regardless of the amount of rental assistance provided to a tenant.

Examples:

	1 Bedroom High HOME Unit		2 Bedroom High HOME Unit
$326	High HOME Rent Limit	$416	High HOME Rent Limit
-$70	Utility Allowance	-$90	Utility Allowance
$256	Maximum Rent Owner May Collect	$326	Maximum Rent Owner May Collect

	1 Bedroom Low HOME Unit		2 Bedroom Low HOME Unit
$326	Low HOME Rent Limit	$416	Low HOME Rent Limit
-$70	Utility Allowance	-$90	Utility Allowance
$256	Maximum Rent Owner May Collect	$326	Maximum Rent Owner May Collect

DHCD will inform grantees of updated HOME rent limits upon its receipt of new HUD-published limits (generally in the spring each year). However, tenants' rents should not be adjusted until the provider requests in writing approval from Howard County to increase the rents for the HOME-assisted units in their project. The County approves all rent increases. The increase occurs at the time their leases are renewed. The tenant must be given a 30-day notice of rent increase.

Owners may not refuse to lease HOME-assisted units to a certificate or voucher holder under the Section 8 Program, or to a holder of a comparable document evidencing participation in a HOME tenant-based rental assistance (TBRA) program, because of the status of the prospective tenant as a holder of such certificate, voucher or comparable HOME TBRA document.

1. High HOME-Assisted Units
   DHCD will require all initial tenants of High HOME-assisted units to have incomes at or below 60% of the area median income. Subsequent tenants are restricted to the income as specified in the HOME Loan Agreement for the project. DHCD reserves the right to further restrict the income level for a project to achieve appropriate levels of project compliance when warranted.

2. Low HOME-Assisted Units

DHCD will require all projects with five or more HOME-assisted units to designate at least 20 percent of the HOME-assisted units as Low HOME units. Tenants must have incomes at or below 50 percent of the area median income to occupy Low HOME-assisted units. DHCD, through the HOME Loan Agreement, may require more Low HOME-assisted units for a project than the HOME rules require.

The rents collected by the owner on Low HOME-assisted units are restricted to the Low HOME rent limits less tenant paid utilities per an approved utility allowance. The only exception is for Low HOME units in a project that receives federal or state project-based rental subsidies and the tenant pays no more than 30% of their adjusted income for rent. The maximum rent may then be the rent allowable under the project-based subsidy program.

INCOME ELIGIBILITY REQUIREMENTS FOR GRANTEES

DHCD requires grantees to use the Part 5 Definition (also referred to as Section 8 Method), which calculates the gross family annual income minus any eligible exclusions for the upcoming year definition found at 24 CPR Part 5.609 to determine applicant income eligibility. Eligibility is based on anticipated or projected income during the next 12 months. A detailed explanation of the Annual (Gross) Income definition can also be found in the "Technical Guide for Determining Income and Allowances for the HOME Program."

The HOME Program allows grantees to use two forms of verification for the Annual (Gross) Income basis of determining income eligibility. These forms are third party verification and review of source documents. Source documents for at least two months must be reviewed. All household members must be counted when calculating household income. When collecting income verification documentation, property owners (or managers) should also consider any likely changes in income.

A. THIRD PARTY VERIFICATION

Under third party verification, a third party (e.g. employer, Social Security Administration, or public assistance agency) is contacted to provide information. Written requests and responses are preferred. However, to clarify or complete missing information on a written response, conversations with a third party are acceptable if documented through a memorandum to the file that documents the contact person, information conveyed and date of call.

To conduct third party verifications, a grantee must obtain a written release from the household that authorizes the third party to release required information. If a third party is unwilling to provide the information or will not do so without charging a fee, the grantee may attempt to obtain the required source documentation through other documented means, such as the use of bank statements.

B. TIMING OF INCOME DETERMINATIONS

Income determinations are to be completed before tenant occupancy of a HOME-assisted unit. If the income determination is more than six months old, a new determination will have to be conducted.

ANNUAL RECERTIFICATION OF INCOME

Due to the HOME Program imposing occupancy restrictions over the length of the affordability period, owners must establish systems to recertify tenant income on an annual basis. Tenant income will be examined on the anniversary of the original income evaluation or at lease renewal. However, the owner may adopt an annual schedule and perform all verifications at the same time. DHCD will verify that tenant income recertification documentation is in the tenant files at the time of on-site inspections.

Although the final HOME rule allows two additional methods of income recertification, in addition to the method of collecting source documentation, DHCD will allow only source documentation and at its discretion, may permit a written statement from the administrator of another government program under which the family receives benefits, and that examines the annual (gross) income gross income of the family each year minus any exclusions the households have. The statement must also indicate the family size, or provide the current income limit for the program and a statement that the family's income does not exceed that limit. If the owner chooses to utilize the alternative method described, they will still be required to collect full source documentation every sixth year of the tenants

INCREASES IN TENANT INCOME

A tenant's income is likely to change over time. If these changes occur during the affordability period, the project owner must take certain steps to maintain compliance with HOME rent and occupancy requirements.

- The project must maintain the correct number of High and Low HOME rent units.
- Rents must be adjusted for tenants whose incomes rise above 80 percent of the area median income.
- Owners of projects assisted with HOME and Low Income Housing Tax Credits must comply with the specific requirements associated with combining these funding sources.

KEEPING THE CORRECT NUMBER OF HIGH AND LOW HOME RENT UNITS

The owner should take the following steps to maintain the correct numbers of High and Low HOME rent units.

If the income of a tenant occupying a Low HOME rent unit increases, but does not exceed 80 percent of area median income, that unit becomes a High HOME rent unit.

To replace the Low HOME rent unit, the owner must rent the next available comparable unit (for "floating" unit projects) or HOME-assisted unit (for "fixed" unit projects) to a very-low- income tenant (income at or below 50% of the area median income). Subject to the terms of the lease, the rent of the tenant whose income has increased may be increased to the High HOME rent for the unit. This process should not increase the number of assisted units.

If a tenant's income increases above 80 percent of the area median income, the unit occupied by the tenant is still considered to be a HOME unit, but the tenant's rent must be adjusted as described below.

A. Adjusting Rent for Over-Income (Above 80% of AMI) Tenants in "Floating Units"
Over-income tenants in HOME-assisted "floating" units must pay 30 percent of their adjusted income for rent and utilities; however, the rent may not exceed the market rent for comparable, unassisted units in the neighborhood. Rent may only be increased at lease renewal. In projects where the HOME units float, the next available unit in the project of comparable size or larger must be rented to a HOME-eligible household. The unit occupied by the over-income tenant is no longer considered HOME-assisted subject to HOME rules after a HOME-eligible household rents a comparable unit.

Note: In units that are financed with both HOME and Low Income Housing Tax Credits (LIHTCs), the LIHTC rules apply when a tenant's income exceeds 80% of AMI Under the LIHTC program, the tenant's rent is not adjusted, and the unit does not need to be replaced by another comparable unit until the tenant's income rises above 140 percent of the LIHTC program eligibility threshold.

B. Adjusting Rent for Over-Income (Above 80% of AMI) Tenants in "Fixed Units"
Over income tenants in HOME-assisted "fixed" units must pay 30 percent of their adjusted income for rent and utilities. Rent may only be increased at lease renewal. There is no rent cap for "fixed" units.

Computing adjusted income for purposes of adjusting rent for over-income tenants is derived by subtracting any of the following deductions (also called allowances) that apply to the household from a household's annual (gross) income:

- $480 for each dependent (includes any of the following family members who are not the head of household or spouse: persons under 18, handicapped/ disabled family members, or full-time students);
- Reasonable child care expenses (for children 12 and under) during the period for which annual income is computed that enable a family member to work or go to school, if no adult is available in the household to provide child care.
- For elderly households (62 and older) only, medical expenses, including medical insurance premiums, in excess of three percent of annual income that are anticipated during the period for which annual income is computed and that are not covered by insurance.

- Reasonable expenses in excess of three percent of annual income for the apparatus and care of a handicapped or disabled family member that enable that person or another person to work that are anticipated during the period for which annual income is computed.
- $400 for any elderly family (head of household or spouse is 62 or older or handicapped or disabled).

For a detailed discussion of calculating annual and adjusted income under the Part 5 Definition of annual income, see the HOME Model Series "Technical Guide for Determining Income and Allowances for the HOME Program." For up-to-date rules and requirements, consult the regulations at 24 CFR Part 5 (subpart F).

DEVELOPMENT PROPERTY MANAGEMENT

Many established owners have property management departments within their organizations or have created separate organizations to perform this function. Other developers hire one management firm to manage properties in its portfolio. Property management is important to ensure the owner's physical, financial, administration and occupancy performance standards for the property. When working with the DHCD-assisted units, it is expected that the owner enter into an agreement that the units will be operated in accordance with all applicable regulations.

TENANT OUTREACH

All HOME Rental Projects maintain a constant presence within the community where the Project is located.

Examples:

- Advertisement within the Baltimore Sun Newspaper biannually, monthly
- Advertisement within the Howard County Flier Newspaper biannually, monthly
- Advertisement within the Howard County Times Newspaper biannually, monthly
- Twice per year post card mailing to all Howard County Housing Choice Voucher Clients
- Property owner Web-site
- One time per year Marketing Event at HOME Rental Location.

31. Recording documents related to a HOME Activity

After all HOME related documents are fully executed; that is, they have been signed by the County Executive and returned to the DHCD, both the Regulatory Agreement and Deed of Trust should be sent to the Office of Recordation to be recorded. DHCD staff will provide a copy to non-profits and subrecipients at no additional cost.

32. Record Keeping

HOME requires documentation for rental projects to show that all program regulations have been met. Because of the long-term monitoring required for rental projects, however, record-keeping responsibilities are more extensive. This section briefly describes the record-keeping responsibilities associated with rental housing for the property owner.

One of the owner's responsibilities is to keep adequate records, to be able to demonstrate compliance with HOME requirements. The owner should keep both project and tenant records.

- Project records should include documentation to back-up rent and utility allowance calculations. If the project's HOME-assisted units are "floating," the owner should also keep records to show how HOME occupancy targets were met (for example, rental logs to show that as units were vacated or tenants became over-income, HOME-assisted units were properly replaced).
- Tenant files should include the documentation necessary to demonstrate that each HOME-assisted unit is properly occupied by an income-eligible tenant. Such documentation includes the tenant's application, initial income verification documents, subsequent income recertification documents and the tenant's lease.

General rental housing records must be kept for five years after project completion. Tenant income, rent and inspection information must be kept for the most recent five years, until five years after the affordability period ends.

33. Single Audit Requirements in Federal Funding

HOWARD COUNTY'S SINGLE AUDIT REQUIREMENTS IN FEDERAL FUNDING

Single Audit, previously known as the OMB Circular A-133 audit, is an organization-wide financial statement and federal awards' audit of a non-federal entity that expends $750,000 or more in federal funds in one year. The Office of Management and Budget (OMB) is the federal entity responsible for tracking these audits. It is intended to provide assurance to the Federal Government

that a non-federal entity has adequate internal controls in place and is generally in compliance with program requirements. Non-federal entities typically include states, local governments, Indian tribes, universities, and non-profit organizations.

Background on the federal law governing nonprofit audits

The government passed the Single Audit Act of 1984, as amended in 1996, to ensure that organizations receiving federal grants use the funds in compliance with the federal government's requirements. The Act refers to a "single audit" because it consolidates multiple individual audits of non-federal entities required for each federal award into a single audit. The stated purpose of the law is to promote sound financial management of government funds by non-federal organizations, promote uniform guidelines for audits, and reduce burdens on government and nonprofits by promoting "efficient and effective use of audit resources."

In December of 2014, the OMB issued Uniform Administrative Requirements, Cost Principles, and Audit Requirements, which combines what had been previously contained in eight separate OMB Circulars related to grants into a single set of rules known as the Uniform Guidance. Prior to the issuance of the Uniform Guidance, OMB Circular A-133 governed the audit requirements under the Single Audit Act.

Subpart F of the Uniform Guidance replaces Circular A-133 with the Single Audit compliance supplement contained in Appendix XI of the Uniform Guidance. Subpart F, Audit Requirements, applies to audits of non-Federal entity fiscal years beginning on or after December 26, 2014 (the first fiscal year that begins after December 26, 2014). For nonprofits using the calendar year as their fiscal year, these requirements became effective for December 31, 2015, year-end audits.

Howard County Nonprofits Compliance Requirement

"Federal grant funds" refers to money paid to a nonprofit, either directly from a federal agency, or by way of funds originating at the federal level and passing through another entity, such as the State of Maryland, Howard County government; or another nonprofit (that nonprofit is known as a "subrecipient" of federal funds).

In order to determine whether the $750,000 threshold is met (thus requiring a Single Audit), a nonprofit must count not only the amount of federal funds received directly from federal agencies, but also funds received from pass-through entities (subrecipients).

Howard County's Administrative Tracking and Issuing of Management Findings

As a result of the Uniform Guidance, all non-federal government agencies and nonprofit organizations that expend $750,000 or more in federal awards in a given fiscal year are required to obtain a Single Audit. During the annual CDBG and HOME Program application process, the County will require all non-profit organizations to declare whether their agency has expended $750,000.00 in federal funding, therefore triggering the Single Audit requirement.

Any agency that indicates the $750,000.00 threshold being met, their application will be forwarded to DHCD's Fiscal Specialist to conduct a review on the Federal Audit Clearinghouse to track

compliance with the Single Audit requirements and to review that a non-federal entity has adequate internal controls in place and is generally in compliance with program requirements. If the agency is not in compliance, the County's DHCD will issue a letter indicating the required actions to remediate the findings.

Items to Be Reviewed
As part of the Single Audit, the auditor must prepare and submit three individual reports to the recipient and to the federal government.

1. The first report is an opinion, or a disclaimer thereof, on whether the recipient's financial statements are presented in conformity with US Generally Accepted Accounting Principles, identical to a financial audit's report on a non-recipient entity.
2. The second report is about the status of internal controls relative to the financial statements and major programs.
3. The third report is an opinion, or a disclaimer thereof, on the degree to which the recipient has complied with laws, regulations, and the terms and conditions of the federal assistance awards. Following the last two reports, if the Single Audit produced audit findings, the auditor must prepare the Schedule of Findings and Questioned Costs discussed earlier.

Reviewing the Auditor's Judgement:

The auditor's judgment is necessary to determine which audit procedures are sufficient to achieve the audit objectives, and whether additional or alternative audit procedures are needed to achieve such objectives.

The auditor is responsible for determining the nature, timing, and extent of the audit procedures necessary to meet the audit objectives (i.e., it is the auditor who determines the necessary amount of his/her audit work needed to form an opinion on whether the recipient complied with laws and regulations).

Timeliness of Submission:
Federal guidelines require recipients to submit the documents no more than 30 days after the auditor reports or 9 months after the final day of the audit period, whichever comes first.

34. Lead Based Paint Work Practice Standards

§ 745.85 Lead Based Paint Work Practice Standards.

Standards for renovation activities:

Renovations must be performed by certified firms using certified renovators as directed in § 745.89. The responsibilities of certified firms are set forth in § 745.89(d) and the responsibilities of certified renovators are set forth in § 745.90(b).

Occupant Protection

1. Firms must post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area.
2. To the extent practicable, these signs must be in the primary language of the occupants.
3. These signs must be posted before beginning the renovation and must remain in place and readable until the renovation and the post-renovation cleaning verification have been completed.
4. If warning signs have been posted in accordance with 24 CFR 35.1345(b)(2) (OSHA) or 29 CFR 1926.62(m) (HUD), additional signs are not required by this section.

Containing the Work Area

1. Before beginning the renovation, the firm must isolate the work area so that no dust or debris leaves the work area while the renovation is being performed.
2. In addition, the firm must maintain the integrity of the containment by ensuring that any plastic or other impermeable materials are not torn or displaced, and taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed.
3. The firm must also ensure that containment is installed in such a manner that it does not interfere with occupant and worker egress in an emergency.

Interior Renovations

The firm must:

1. Remove all objects from the work area, including furniture, rugs, and window coverings, or cover them with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed.
2. Close and cover all ducts opening in the work area with taped-down plastic sheeting or other impermeable material.
3. Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.
4. Cover the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater. Floor containment measures may stop at the edge of the vertical barrier when using a vertical containment system consisting of impermeable barriers that extend from the floor to the ceiling and are tightly sealed at joints with the floor, ceiling and walls.
5. Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area.

Exterior Renovations

The firm must:

1. Close all doors and windows within 20 feet of the renovation. On multi-story buildings, close all doors and windows within 20 feet of the renovation on the same floor as the renovation, and close all doors and windows on all floors below that are the same horizontal distance from the renovation.
2. Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.
3. Cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line prevents 10 feet of such ground covering. Ground containment measures may stop at the edge of the vertical barrier when using a vertical containment system.
4. If the renovation will affect surfaces within 10 feet of the property line, the renovation firm must erect vertical containment or equivalent extra precautions in containing the work area to ensure that dust and debris from the renovation does not contaminate adjacent buildings or migrate to adjacent properties. Vertical containment or equivalent extra precautions in containing the work area may also be necessary in other situations in order to prevent contamination of other buildings, other areas of the property, or adjacent buildings or properties.

Prohibited and Restricted Practices

The work practices listed below are prohibited or restricted during a renovation as follows:

1. Open-flame burning or torching of painted surfaces is prohibited.
2. The use of machines designed to remove paint or other surface coatings through high speed operation such as sanding, grinding, power planning, needle gun, abrasive blasting, or sandblasting, is prohibited on painted surfaces unless such machines have shrouds or containment systems and are equipped with a HEPA vacuum attachment to collect dust and debris at the point of generation. Machines must be operated so that no visible dust or release of air occurs outside the shroud or containment system.
3. Operating a heat gun on painted surfaces is permitted only at temperatures below 1,100 degrees Fahrenheit.

Waste from Renovations

1. Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal. If a chute is used to remove waste from the work area, it must be covered.
2. At the conclusion of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored under containment, in an enclosure, or behind a barrier that prevents release of dust and debris out of the work area and prevents access to dust and debris.
3. When the firm transports waste from renovation activities, the firm must contain the waste to prevent release of dust and debris.

Cleaning the Work Area

After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.

Interior and Exterior Renovations

The firm must:

1. Collect all paint chips and debris and, without dispersing any of it, seal this material in a heavy-duty bag.
2. Remove the protective sheeting.
    a. Mist the sheeting before folding it,
    b. Fold the dirty side inward, and either tape shut to seal or seal in heavy-duty bags.
    c. Sheeting used to isolate contaminated rooms from non-contaminated rooms must remain in place until after the cleaning and removal of other sheeting.
    d. Dispose of the sheeting as waste.

Additional Cleaning for Interior Renovations

The firm must clean all objects and surfaces in the work area and within 2 feet of the work area in the following manner, cleaning from higher to lower:

Walls:
Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.

Remaining Surfaces:
Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum. The HEPA vacuum must be equipped with a beater bar when vacuuming carpets and rugs.

- Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth.
- Mop uncarpeted floors thoroughly, using a mopping method that keeps the wash water separate from the rinse water, such as the 2-bucket mopping method, or using a wet mopping system.

Standards for Post-Renovation Cleaning Verification

Interiors:
A certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present. If dust, debris or residue is present, these conditions must be removed by re-cleaning and another visual inspection must be performed.

After a successful visual inspection, a certified renovator must:

1. Verify that each windowsill in the work area has been adequately cleaned, using the following procedure.
    a. Wipe the windowsill with a wet disposable cleaning cloth that is damp to the touch. If the cloth matches or is lighter than the cleaning verification card, the windowsill has been adequately cleaned.
    b. If the cloth does not match and is darker than the cleaning verification card, re-clean the windowsill as directed in paragraphs (a)(5)(ii)(B) and (a)(5)(ii)(C) of this section, then either use a new cloth or fold the used cloth in such a way that an unused surface is exposed, and wipe the surface again. If the cloth matches or is lighter than the cleaning verification card, that windowsill has been adequately cleaned.
    c. If the cloth does not match and is darker than the cleaning verification card, wait for 1 hour or until the surface has dried completely, whichever is longer.
    d. After waiting for the windowsill to dry, wipe the windowsill with a dry disposable cleaning cloth. After this wipe, the windowsill has been adequately cleaned.

2. Wipe uncarpeted floors and countertops within the work area with a wet disposable cleaning cloth.
    a. Floors must be wiped using an application device with a long handle and a head to which the cloth is attached.
    b. The cloth must remain damp at all times while it is being used to wipe the surface for post-renovation cleaning verification.
    c. If the surface within the work area is greater than 40 square feet, the surface within the work area must be divided into roughly equal sections that are each less than 40 square feet.
    d. Wipe each such section separately with a new wet disposable cleaning cloth. If the cloth used to wipe each section of the surface within the work area matches the cleaning verification card, the surface has been adequately cleaned.
    e. If the cloth used to wipe a particular surface section does not match the cleaning verification card, re-clean that section of the surface as directed in paragraphs (a)(5)(ii)(B) and (a)(5)(ii)(C) of this section, then use a new wet disposable cleaning cloth to wipe that section again. If the cloth matches the cleaning verification card, that section of the surface has been adequately cleaned
    f. If the cloth used to wipe a particular surface section does not match the cleaning verification card after the surface has been re-cleaned, wait for 1 hour or until the entire surface within the work area has dried completely, whichever is longer.
    g. After waiting for the entire surface within the work area to dry, wipe each section of the surface that has not yet achieved post-renovation cleaning verification with a dry disposable cleaning cloth. After this wipe, that section of the surface has been adequately cleaned.

* When the work area passes the post-renovation cleaning verification, remove the warning signs.

Exteriors

A certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present on surfaces in and below the work area, including windowsills and the ground. If dust, debris or residue is present, these conditions must be eliminated and another visual inspection must be performed.

* When the area passes the visual inspection, remove the warning signs.

Optional Dust Clearance Testing

Cleaning verification need not be performed if the contract between the renovation firm and the person contracting for the renovation or another Federal, State, Territorial, Tribal, or local law or regulation requires:

1. The renovation firm to perform dust clearance sampling at the conclusion of a renovation covered by this subpart.
2. The dust clearance samples are required to be collected by a certified inspector, risk assessor or dust sampling technician.
3. The renovation firm is required to re-clean the work area until the dust clearance sample results are below the clearance standards in § 745.227(e)(8) or any applicable State, Territorial, Tribal, or local standard.

Activities conducted after post-renovation cleaning verification
Activities that do not disturb paint, such as applying paint to walls that have already been prepared, are not regulated by this subpart if they are conducted after post-renovation cleaning verification has been performed.

[73 FR 21761, Apr. 22, 2008, as amended at 76 FR 47938, Aug. 5, 2011]

745.86 Recordkeeping and reporting requirements.

Firms performing renovations must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with this subpart for a period of 3 years following completion of the renovation. This 3-year retention requirement does not supersede longer obligations required by other provisions for retaining the same documentation, including any applicable State or Tribal laws or regulations.

Records that must be retained shall include (where applicable):

- Records or reports certifying that a determination had been made that lead-based paint was not present on the components affected by the renovation, as described in § 745.82(a).
- Reports prepared by a certified inspector or certified risk assessor (certified pursuant to either Federal regulations at § 745.226 or an EPA-authorized State or Tribal certification program).
- Records prepared by a certified renovator after using EPA-recognized test kits, including an identification of the manufacturer and model of any test kits used, a description of the components that were tested including their locations, and the result of each test kit used.
- Records prepared by a certified renovator after collecting paint chip samples, including a description of the components that were tested including their locations, the name and address of the NLLAP-recognized entity performing the analysis, and the results for each sample.
- Signed and dated acknowledgments of receipt as described in § 745.84(a)(1)(i), (a)(2)(i), (b)(1)(i), (c)(1)(i)(A), and (c)(1)(ii)(A).
- Certifications of attempted delivery as described in § 745.84(a)(2)(i) and (c)(1)(ii)(A).
- Certificates of mailing as described in § 745.84(a)(1)(ii), (a)(2)(ii), (b)(1)(ii), (c)(1)(i)(B), and (c)(1)(ii)(B).(
- Records of notification activities performed regarding common area renovations, as described in § 745.84(b)(3) and (b)(4), and renovations in child-occupied facilities, as described in § 745.84(c)(2).

DOCUMENTATION OF COMPLIANCE WITH THE REQUIREMENTS OF 745.85

Documentation of compliance with the requirements of § 745.85, including:

- Documentation that a certified renovator was assigned to the project,
- The certified renovator provided on-the-job training for workers used on the project,
- The certified renovator performed or directed workers who performed all of the tasks described in § 745.85(a), and
- The certified renovator performed the post-renovation cleaning verification described in § 745.85(b).

NOTE: If the renovation firm was unable to comply with all of the requirements of this rule due to an emergency as defined in § 745.82, the firm must document the nature of the emergency and the provisions of the rule that were not followed.

DOCUMENTING COMPLIANCE

This documentation must include a copy of the certified renovator's training certificate, and a certification by the certified renovator assigned to the project that:

1. Training was provided to workers (topics must be identified for each worker).
2. Warning signs were posted at the entrances to the work area.
3. If test kits were used, that the specified brand of kits was used at the specified locations and that the results were as specified.

4. The work area was contained by:

    a. Removing or covering all objects in the work area (interiors).
    b. Closing and covering all HVAC ducts in the work area (interiors).
    c. Closing all windows in the work area (interiors) or closing all windows in and within 20 feet of the work area (exteriors).
    d. Closing and sealing all doors in the work area (interiors) or closing and sealing all doors in and within 20 feet of the work area (exteriors).
    e. Covering doors in the work area that were being used to allow passage but prevent spread of dust.
    f. Covering the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater (interiors) or covering the ground with plastic sheeting or other disposable impermeable material anchored to the building extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line prevents 10 feet of such ground covering, weighted down by heavy objects (exteriors).
    g. Installing (if necessary) vertical containment to prevent migration of dust and debris to adjacent property (exteriors).

5. If paint chip samples were collected, that the samples were collected at the specified locations, that the specified NLLAP-recognized laboratory analyzed the samples, and that the results were as specified.
6. Waste was contained on-site, and while being transported off-site.
7. The work area was properly cleaned after the renovation by:

    a. Picking up all chips and debris, misting protective sheeting, folding it dirty side inward, and taping it for removal.
    b. Cleaning the work area surfaces and objects using a HEPA vacuum and/or wet clothes or mops (interiors).
    c. The certified renovator performed the post-renovation cleaning verification (the results of which must be briefly described, including the number of wet and dry cloths used).

This information required can be provided by completing the form titled "Harford County Renovation Recordkeeping Checklist" or a similar form containing the test kit information required by § 745.86(b)(1)(ii) and the training and work practice compliance information required by § 745.86(b)(6).

WHO MUST GET COPIES OF REPORTS

When the final invoice for the renovation is delivered or within 30 days of the completion of the renovation, whichever is earlier, the renovation firm must provide information pertaining to

compliance with this subpart to the following persons:

- Howard County (along with invoice)
- The owner of the building; and, if different,
- An adult occupant of the residential dwelling, if the renovation took place within a residential dwelling, or;
- An adult representative of the child-occupied facility, if the renovation took place within a child-occupied facility.

NOTE: When performing renovations in common areas of multi-unit target housing, renovation firms must post the information required by this subpart or instructions on how interested occupants can obtain a copy of this information. This information must be posted in areas where it is likely to be seen by the occupants of all of the affected units.

DUST CLEARANCE SAMPLING

If dust clearance sampling is performed in lieu of cleaning verification as permitted by § 745.85(c), the renovation firm must provide, when the final invoice for the renovation is delivered or within 30 days of the completion of the renovation, whichever is earlier, a copy of the dust sampling report to:

- The owner of the building; and, if different,
- An adult occupant of the residential dwelling, if the renovation took place within a residential dwelling, or an adult representative of the child-occupied facility, if the renovation took place within a child-occupied facility.

When performing renovations in common areas of multi-unit target housing, renovation firms must post these dust sampling reports or information on how interested occupants of the housing being renovated can obtain a copy of the report. This information must be posted in areas where they are likely to be seen by the occupants of all of the affected units.

[73 FR 21761, Apr. 22, 2008, as amended at 75 FR 24819, May 6, 2010; 76 FR 47939, Aug. 5, 2011]

APPENDIX A: Program Administration Procedures (updated per the 2013 HOME Rule)

A. Project Underwriting and Subsidy Layering

i. Project underwriting

Most HOME projects in Howard County have multiple sources of funds and are seeking HOME funds to fill the gap in their project budget.At a minimum, the HOME Program Specialist and Grants Administrator review a project application to make sure the project is underwritten well, will be stable in the long-term, and will be leveraging HOME funds. For larger projects (over 5 units), the Grants team completes an extensive review of the project's financing to determine how best to meet its budget needs. This is an addition to a review of the project's underwriting by the HOME Program Specialist.

ii. Subsidy Layering

Before committing funds to a rental project, DHCD will evaluate the project and verify that the owner did not request or was not allocated any more HOME funds in combination with other governmental assistance than is necessary to provide the affordable housing. DHCD will review and keep project records demonstrating that each rental housing project meets required subsidy layering guidelines. Part of the documentation process includes a Proforma (project income and expense statement) which should include achievable rent levels, market vacancies and operating expenses.

The investment of HOME funds is limited by per-unit subsidy limits based on number of bedrooms and location. The HOME Program Specialist reviews each project to ensure the subsidy level is appropriate and complies with the maximum and minimum per-unit HOME subsidy limits as established by HUD. DHCD's staff will also complete a subsidy layering review as part of their underwriting unless a subsidy layering review has been completed by the state Department of Housing and Community Development because of state funds in the project. In those cases, DHCD staff review the state subsidy layering.

B. Homebuyer Underwriting

The Department can use HOME Program funds for settlement down payment and closing cost assistance to assist eligible homebuyers and will do so from time to time as the need arises. Should the Department of Housing use HOME Program funds for settlement, down payment and closing cost assistance, the County will do so only if the activity is noted in the Annual Action Plan or by making an amendment to the Annual Action Plan.

To be eligible for HOME Program funds eligible candidates will be subject to the following requirements;

- Eligible candidate will be awarded loans up to $40,000 toward the settlement and down payment costs associated with the purchase of a single-family dwelling unit; The minimum subsidy limit for a HOME Program transaction is $1,000 and the maximum subsidy that can be placed into a HOME-eligible activity is outlined in HUD correspondence dated December 21, 2015. CPD Notice15-003 can be referenced for the methodology.
- The dwelling unit purchased with HOME Program funds must be the principal resident of the applicant;
- Eligible applicants must have a household annul gross income of no more than 80 percent of the area median income as prescribed by HUD adjusted for household size and these values will be changed from time to time;
- The debt to income (DTI) ratio of an applicant must not exceed 45 percent;
- The loan to value (LTV) will not exceed 105 percent;
- The sales price of the home must not exceed 95 percent of the area median income purchase price. If rehabilitating the property after rehabilitation value must not exceed 95% of the area median purchase price as published by HUD and updated from time to time; or as determined locally through market analysis;
- HOME- eligible applicants should have at least $1,000 and one month's mortgage payment in a savings account. If a HOME-eligible applicant possesses assets that exceed three month's mortgage payment plus $1,000 in a savings account, HOME assistance will be reduced based on need and the existing underwriting of the buyer;
- Since this is a direct subsidy to the homebuyer, the eligible candidate is subject to the recapture provision;
- Applicant must have acquired a first mortgage at the time of application for HOME assistance;
- Applicant will have a back end ratio not to exceed 45% and a front end ratio not to exceed 40%;
- Applicant must already be pre-approved for a mortgage with a qualified lender; and
- Applicant must be a first-time homebuyer.

HOMEBUYER COUNSELING

Homebuyers receiving down payment assistance or homebuyers that reside in HOME-assisted units must receive housing counseling before and after the purchase of the property. The cost of housing counseling can be charged as an eligible project cost, which is subject to the per unit maximum subsidy limit. The prospective homebuyer can be charged for counseling, so long as the costs are reasonable. Homeownership counseling should provide information on financial management assistance, home sales contracts, and mortgage transactions and also assist homebuyers with eliminating any credit problems that may prevent the homebuyers from purchasing the property. Pursuant to the HUD publishing, Housing Counseling: New Certification final rule (December 14, 2016), housing counselors and housing counseling agencies are now required to be certified to be eligible to assist HOME eligible applicants. The

Department will work with housing counselling agencies in becoming certified.

C. Risk-based Monitoring

Howard County's monitoring policy is to monitor each HOME funded rental project each year. This monitoring visit includes a file review as well as a review of financial statements for the project. A sample of units are inspected at every project every year. If a monitoring visit reveals significant project issues, a follow up visit would be scheduled within two months of the original visit to make sure all issues had been sufficiently addressed.

D. Inspection Procedures

Howard County's HOME units are inspected by the Program Specialist and Operations Supervisor. Units are held to a higher standard than UCPS which is a standard unit checklist for leasing a market rate unit. Issues ae rated in terms of what must be corrected and what is recommended to be fixed. Projects have a thirty (30) day period to make any unit improvements that have been identified as flawed.

APPENDIX B: Howard County Affirmative Fair Housing Marketing Plan

A. POLICY

Howard County Housing (DHCD) in accordance with the regulations of the HOME Investment Partnerships (HOME) Program (24 CFR 92.3510), has established this "Affirmative Fair Housing Marketing Plan" to ensure that the County and all entities to whom they have allocated HOME Funds employ a marketing plan that promotes fair housing and ensures outreach to all potentially eligible households, especially those least likely to apply for assistance.

The County's policy is to provide information and attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status (persons with children under 18 years of age, including pregnant women), or disability. The procedures followed are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), and Executive Order 11063, which prohibits discrimination in the sale, leasing, rent and other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

B. PROCEDURES

The HOME Final Rule regarding affirmative marketing procedures and requirements apply to all rental, homebuyer, rehabilitation, down payment assistance and TBRA projects funded with HOME Program funding.

DHCD is committed to the goals of affirmative marketing that will be implemented through the following procedures:

i. Providing equal service without regard to race, color, religion, sex, handicap, familial status, or national origin of any client, customer, or resident of any community;

ii. Keeping informed about fair housing laws and practices;

iii. Informing clients and customers about their rights and responsibilities under the fair housing laws by providing verbal and written information;

iv. Evaluating the effectiveness and compliance of all marketing as it relates to fair housing;

v. Including the Equal Opportunity logo or slogan, and where applicable the accessibility logotype, in all ads, brochures, and written communications to owners and potential tenants;

vi. Displaying the HUD's fair housing posters (at a minimum in English and Spanish

versions) in rental offices or other appropriate locations;

vii. Soliciting applications for vacant units from persons in the housing market who are least likely to apply for assistance without the benefit of special outreach efforts; working with the local public housing authority and other service and housing agencies, as well as community groups, places of worship, employment centers, fair housing groups, housing counseling agencies and popular social media tools to distribute information to a wide and diversified population;

viii. Maintaining documentation of all marketing efforts (such as copies of newspaper ads, memos of phone calls, copies of letters).

vix. Maintaining a record of applicants for vacant units with a general profile of the applicant, how the applicant learned of the vacancy, the outcome of the application, and if rejected, why; maintaining this record for two years or through one compliance audit, whichever is the shorter period of time.

C. ASSESSMENT

In conjunction with the annual on-site compliance reviews, DHCD will:

i. Review and evaluate records of affirmative marketing efforts (advertisements, flyers, and electronic media spots, etc.);

ii. Evaluate outcomes and effectiveness of marketing efforts and make changes where needed.

iii. Evaluate whether good faith efforts have attracted a diversified cross-section of the eligible population.

D. CORRECTIVE ACTIONS

Failure to meet affirmative marketing requirements will result in the following corrective actions:

i. For failure to comply, DHCD will set a probationary period for compliance, not to exceed six months, during which time DHCD will provide more specific guidelines for compliance.

ii. Further failure to comply with the affirmative marketing requirements may result in the withdrawal of HOME support.

iii. Further failure to take appropriate actions to correct discrepancies in affirmative marketing programs may result in steps to recover all invested HOME funds.

APPENDIX C: Monitoring Plan

A. Objectives

The objective of the Howard County HOME Monitoring Plan is to establish standards for evaluating and reporting a grantee's compliance with program requirements. Howard County will conduct on-site reviews to verify accuracy of records/documents, review program policies and procedures, conduct housing inspections, and evaluate overall administrative compliance to HOME Regulations.

B. Monitoring Format

A written Report will be prepared and provided to the grantee following the completion of each monitoring review. The report will include the following information:

- An explanation of the purpose and scope of the review;
- A list of findings, comments, recommendations, and corrective actions to be taken;
- A list of the client files reviewed;
- A list of the houses/units inspected;
- An evaluation of project performance to date; and
- A time frame for taking corrective action.

C. Monitoring Compliance

HOME activities will be evaluated on the basis of the following program areas:

- Adherence to HOME guidelines, procedures, and regulations;
- Grantee's administration and management;
- Fair Housing;
- Housing Quality Standard Inspections;
- And Lead Based Paint, if applicable

D. Pre-Monitoring Preparation

Prior to an on-site monitoring visit, the County will provide written notification of the visit to the grantee. The notice will provide the following information:

- The date(s) and time of the visit;
- A copy of the monitoring checklist

The grantee will be asked to provide the County with the following:

- Agreements/contracts;
- Policy guidelines and procedures, administrative plans, and operation manuals;
- Beneficiary data

E. Monitoring and Inspection Schedule

DHCD staff will provide program monitoring over three phases:

i.Contract Development Phase

- Ensuring that projects are consistent with the Consolidated Plan
- Ensuring that all Environmental Review requirements have been met
- Ensuring clients are income-eligible

ii. Development Phase

- Ensuring that project costs, budgets, and timelines are adhered to
- Ensuring conformance to HOME standards through periodic property inspections

iii. Post-Development Phase (Long-Term)

- The duration and frequency of on-site grantee monitoring and inspections is based on the length of the affordability period and the total number of project units.

Appendix D: Using the Low Income Housing Tax Credits with HOME Funds

There are essentially four ways HOME funds can be used with low-income housing tax credits.

Market Rate Loan

If the HOME funds are provided at or above the applicable federal rate, these funds are not treated like a federal subsidy. The project qualifies for the 9% credit for eligible improvement costs and is eligible for the 130 percent basis for projects in "qualified census tracts" or "difficult development areas" (QCT/ DDA).

Below Market Rate Loan with 9% Credit

If HOME funds are provided at an interest rate below the applicable federal rate, they may still be counted in the eligible basis and the project may receive a 9% credit if the project meets stricter occupancy requirements. The project may receive the 9% credit if 40% of the residential rental units are occupied by tenants with incomes at or below 50% of the area median income. However, such projects are not eligible for the 130 percent basis for projects in "qualified census tracts" or "difficult development areas".

Below Market Rate Loan with 4% Credit

Some projects qualify only for a 4% credit regardless of the way HOME funds are invested in the project. For example, a project with other Federal or tax-exempt mortgage revenue bond funds included in the basis is only eligible for a 4% credit under any circumstance, so HOME funds can be lent at any below market interest rate terms without consequence to the credit.

Grant

HOME funds may be provided in the form of a grant, but, they may not be counted in the eligible basis for the project, and therefore do not contribute to the credits for which the project is eligible. Therefore, a loan instrument is generally preferable to a grant (Note that deferred payment loans are generally permissible provided the debt service accrues and there is a reasonable expectation that the loan can be repaid no later than when the loan matures). Projects using HOME funds with Low Income Housing Tax Credits have to consider a number of items in blending the two sets of program rules. The following chart provides an overview of tax credit rules and the requirements for combining the two programs.

RULES FOR COMBINING HOME FUNDS AND TAX CREDITS

	Tax Credit Program Rules	Combining Tax Credits with HOME
Occupancy Requirements	At least 20 percent of assisted units must be reserved for households with incomes at or below 50 percent of area median; OR 40 percent of the units must be reserved for households with incomes at or below 60 percent of area median income.	If HOME funds are provided at below the market interest rate, at least 40 percent of the units must be reserved for households with incomes at or below 50 percent of the area median income to qualify for the 9 percent credit. Otherwise, on projects with 5 or more HOME-assisted units at least 20 percent of the units must serve households with incomes at or below 50 percent of area median income (to meet HOME requirements).
	Tax Credit Program Rules	Combining Tax Credits with HOME
Rent Requirements	Rents for qualified units must not exceed the rent limit set for the program. These limits are set by bedroom size and are based on the qualifying incomes of an imputed household size. They are provided by Howard County Housing.	For units to qualify as both tax credit and HOME-assisted units, rents cannot exceed either program limit. Low HOME rent units are subject to Low HOME rents and tax credit limits and High HOME rent units are subject to High HOME rents and tax credit limits.
Establishin g Tenant Eligibility	Documentation --Tenants must provide acceptable documentation of income from a third party source. All sources of income are verified. Definitions --The tax credit program defines income using the Section 8 definition of annual (gross) income. Asset Income --Assets $5000 or less: tenants certify asset amount and income. Use actual income. Assets above $5000: verify amount and income. Use larger of actual income from assets or imputed asset income.	Documentation --Initial tenant eligibility documentation for both programs is the same. Definitions -DHCD requires the use of the Section 8 definition of income for HOME. Asset Income --Follow more stringent HOME rules and verify all asset income.

Reexaminations of Income	Reexaminations are performed annually following the	Tax credit/ HOME projects may request waivers m order to perform

	Procedures as at initial certification; however, an owner may request a waiver of reexamination requirements if all units in the project are tax credit	Re-examinations similar to HOME. Otherwise, the project must follow the more stringent tax credit requirements.
Over-Income Tenants	Rent for over-income tenants remains restricted. An owner may increase an over-income tenants rent, but only after the unit is replaced with another low-income unit in the project, thereby keeping the portion of low-income units above the minimum amount required for the owner to be eligible for the credit. "Over-income" IS defined as above 140 percent of the project income limit.	HOME rules defer to tax credit rules -- rent remains restricted. (In other words, in no case can the rent exceed limits set by the tax credit program).
	Tax Credit Program Rules	Combining Tax Credits with HOME
Monitoring	Projects are monitored annually throughout the affordability period. Statement of compliance IS submitted annually with documentation of occupancy. On-site inspections are conducted by DHCD	DHCD will monitor according to their program requirements.

Occupancy Requirements

Tax credit projects must set aside at least 20 percent of their units for tenants with incomes at or below 50 percent of the area median (20/ 40 set-aside) or 40 percent of their units for tenants with incomes at or below 60 percent of the area median income (40/ 60 set-aside). When combining HOME and tax credits, occupancy requirements depend on the type of credit taken and the type of HOME funding provided:

In order to take the 9 percent credit in conjunction with below-market-rate HOME funds, joint HOME/ tax credit projects must meet a higher occupancy standard than either the tax credit program or the HOME program alone requires:

- 40 percent of the units must be occupied by tenants with incomes at or below 50 percent of area median. (However, such projects are not eligible for the 130 percent

increase in basis for projects in "qualified census tracts" or "difficult development areas."

- To receive the 130 percent increase, the project must either take the four percent credit, or use the HOME funds at or above the applicable federal rate.)

- In all other cases, projects must ensure that they meet both sets of program rules.

Rents

When combining the two types of funding, two sets of rent rules apply.
Qualified tax credit units must not exceed tax credit rent limits, while HOME-assisted units must meet HOME rent requirements. If a unit is being counted under both programs, the stricter rent limit applies:

- Low HOME rent units are subject to the lower of the Low HOME rent and the tax credit rent.
- High HOME rent units are subject to the lower of the High HOME rent and the tax credit rent.

When tenants receive additional subsidy through rental assistance programs such as Section 8, additional requirements apply.

- HOME allows the rent to be raised to the rental assistance program limit only if the tenant pays no more than 30 percent of adjusted income, the subsidy is project-based (not tenant-based), and the tenant's income is less than 50 percent of the area median income.
- Tax credit rules state that if the rental assistance program rent limit exceeds the tax credit rent, the unit rent may be raised to the higher limit as long as tenants pay no more than 30 percent of their adjusted monthly income for housing costs.
- In a joint tax credit/ HOME-assisted unit, the stricter HOME requirements would apply.

Establishing Tenant Eligibility

Both the HOME and tax credit programs require project owners to certify tenants' incomes, to ensure that they are income-eligible and that the project is in compliance with initial occupancy requirements.

- To demonstrate eligibility under both programs, property managers must have tenants certify their income, and obtain supporting documentation. This documentation must be kept in project unit files for review by the monitoring agencies.
- Under tax credit rules the Section 8 definition of annual (gross) income is used.
- DHCD requires the use of the Section 8 definition of annual (gross) income for HOME projects.

A difference between HOME and tax credit rules is that HOME requires verification of all

asset income, whereas the tax credit rules require verification of asset income if the household's assets are greater than $5,000. For total assets of less than $5,000, the tax credit program allows tenants to provide a signed statement of asset income.

A tenant in a unit subsidized by both sources of funds would have to comply with the stricter HOME requirements.

Reexaminations of Tenant Eligibility

The tax credit program does not allow alternative methods of tenant recertification allowed under the HOME program.

For projects with both HOME funds and tax credits, owners may seek a project waiver from the state allocating agency to allow certification documentation similar to HOME. Alternatively, the project must comply with the tax credit rules (and, thus, automatically comply with the HOME requirements).

Over-Income Tenants

The HOME and tax credit programs have slightly different approaches to over-income tenants. The definition of an over-income tenant differs under the two programs. Tax credit rules define "over-income" as having income above 140 percent of the project income limit.

Under HOME, the tenants are considered over-income if their income rises above 80 percent of area median income.

Further, unlike under HOME, the rent remains restricted under the tax credit program. An owner may increase an over-income tenant's rent, but only after the unit is replaced with another low- income unit in the project, thereby keeping the portion of low-income units above the minimum amount required for the' owner to be eligible for the credit. To resolve this conflict, HOME rules state that when funds from both programs are used on the same unit, the tax credit rules should be followed.

Monitoring

Both programs require annual monitoring to ensure compliance with program rules over the length of a pre-established affordability period. DHCD will monitor according to their program requirements.

Additional Notes

- Deed of Trust- The trustee is always the current director of Finance. Typically there are two trustees, but since a Chief of Staff was not replaced, there is only one. Older deeds may show two trustees, Aaron Greenfield and Sharon Greisz,
  At time of this publication it is Stanley Milesky.
- Completed grant/loan documents should be printed single sided and only one copy of each document is required for signatures.

- Once all documents have been returned with signatures, the Deed of Trust and Regulatory Agreements should be recorded. They are sent to the Division of Land Records. If a payment is necessary to have the documents recorded, they should be sent to the Department of Finance first. If a payment is NOT necessary, the documents should still be sent to the Department of Finance, with attention to Leslie Bennett. However, if the document is exempt from payment, please use the following text in the header;

  "PURSUANT TO SECTION 3-603 OF THE REAL PROPERTY ARTICLE OF THE ANNOTATED CODE OF MARYLAND, THIS DEED OF TRUST IS EXEMPT
  FROM THE PAYMENT OF RECORDING FEES. EXEMPTION PURSUANT TO SECTION 12-108(a) TAX-PROPERTY ARTICLE."

APPENDIX E: Annual Rent and Income Checklist- Form 6-D

HOME Monitoring Checklist 6-D

Project Compliance Report: Rental Housing

Project Name:		Date Completed:	
Owner Name:		Reporting Period:	

A	B	C	D	E	F	G	H	I	J	K	L
UNIT NUMBER	LOW OR HIGH HOME RENT UNIT?	TENANT NAME: **(LAST NAME, FIRST NAME)**	NO. PERSONS	NO. BDRDOMS	DATE OF LAST INCOME CERT.	MAX RENT	UTILITY ALLOWANCE	MONTHLY UNIT RENT	TENANT'S ANNUAL GROSS INCOME	COMPLIANCE Y/N (HCH Staff)	**UNIT STATUS** (HCH Staff)

APPENDIX F: Annual Review of Rents and Income Form

Howard County Department of Housing and Community Development

Howard County HOME Investment Partnership Program (HOME)

Annual Review of Rents and Income

Instructions: Please initial after each step is completed. Once step four (4) has been completed, the employee should print their name, sign and date below. Place the completed form, along with Checklist 6-D (Project Compliance Report) and a copy of the correspondence letter in the respective file under monitoring.

Project Name/Mgmt Company: _____

1. Emailed notice to property manager. Initials_____
2. Rent roll and Income data submitted to Howard County Housing. Initials_____
3. Review rents and income and complete checklist 6-D. Initials_____
4. Write correspondence letter to property manager. Initials_____

Review completed by (Please Print): _____

Signature: _____

9820Patuxent Woods Drive, Columbia MD 21046 | Page 85

OMB Control No: 2506-0117 (exp. 09/30/2021)

Date: _____