MEMORANDUM

TO: MAYOR AND CITY COMMISSION

FROM: CITY ATTORNEY'S OFFICE

DATE: February 15, 2021

RE: **Proposed Substantial Amendment #2 to CDBG/HOME Action Plan for CDBG-CV3 Funding**

Attached hereto for your consideration is a proposed amendment to Lakeland's FY19-20 One-Year Action Plan & Projected Use of funds for an additional allocation of Community Development Block Grant funding received under the Coronavirus Aid, Relief and Economic Security (CARES) Act.

On September 11, 2020, the City of Lakeland received notification of its second allocation of CDBG-CV HUD funds ("CDBG-CV3") in the amount of $787,276 for the continued use in preventing, preparing for, and responding to COVID-19 impacts. The award of these additional CDBG-CV funds brings the total amount of COVID relief funds for housing and public services received from various sources to over $2.6 million. A detailed summary of funding sources and the use of the funds is attached for reference.

Guidance received from HUD once again included an expedited process for amending the action plan in addition to a higher threshold for public service grants with a focus on vaccine distribution and legal support for housing related challenges. The Proposed Substantial Amendment #2 seeks to budget the allocation of CDBG-CV3 funding as follows:

Activity	CDBG-CV	TOTAL
Emergency Rent Relief Program	$ 262,276	**$262,276**
Mortgage Assistance	$ 150,000	**$150,000**
Public Services		**$200,000**
Florida Rural Legal Services	$ 50,000	
Lakeland Volunteers in Medicine	$ 50,000	
Peace River Center	$ 50,000	
Talbot House	$ 50,000	
Staff Activity Delivery	$ 100,000	**$100,000**
Administration	$ 75,000	**$ 75,000**
TOTAL	**$ 787,276**	**$787,276**

The non-profits listed above are recommended for funding as they propose to provide vital public services to the community in response to the pandemic as identified by HUD. The selections were made by an internal review committee consisting of Community and Economic Development Department staff and the Emergency Manager

and based on meeting HUD priorities; maximizing the number of clients served; and avoiding duplication of services.

The additional funds for the Emergency Rent Relief and Mortgage Assistance Programs will continue to assist persons and households, with eligibility and assistance generally determined as follows but with a maximum award of assistance for six (6) month's, an increase from three (3) months, and/or $5,000, whichever occurs first:

- Must be City of Lakeland resident (County residents eligible for Polk County program);
- Must be delinquent on mortgage, rent, and/or public utilities payment(s);
- Must have verifiable loss of income related to COVID-19 impacts, i.e. job loss, health, etc.;
- Eligible household income capped at 80% of Area Median Income (AMI) adjusted for family size:

Household Size	1	2	3	4	5	6	7	8
80% AMI	$32,950	$37,650	$42,350	$47,050	$50,850	$54,600	$58,350	$62,150

It is recommended that the City Commission approve the proposed Substantial Amendment #2 to FY19-20 Action Plan for the appropriation and use of an additional $787,276.00 of CDBG-CV funds.

Attachment

HOUSING RELATED COVID RELIEF FUNDS RECEIVED
February 15, 2021

COVID Housing Relief Funds								
ACTIVITY	CRF 1	CRF 2	CRF 3	CDBG	CDBG-CV	CDBG-CV3	SHIP	TOTAL
	8/3/2020	10/5/2020	11/9/2020	4/27/2020	4/27/2020	2/15/2021	4/27/2020	
Emergency Rent Relief Program	$275,789.00	$143,625.00	$55,000.00	$350,000.00	$375,310.00	$262,276.00	$180,000.00	$1,642,000.00
Public Services	$0.00	$0.00	$0.00	$0.00	$75,000.00	$200,000.00	$0.00	$275,000.00
Foreclosure Prevention Counseling	$0.00	$0.00	$0.00	$0.00	$50,000.00	$0.00	$0.00	$50,000.00
Mortgage Relief Program	$75,000.00	$100,000.00	$45,000.00	$0.00	$0.00	$150,000.00	$0.00	$370,000.00
Staff Activity Delivery	$0.00	$0.00	$0.00	$0.00	$0.00	$100,000.00	$0.00	$100,000.00
Administration	$27,865.00	$17,069.00	$0.00	$0.00	$75,000.00	$75,000.00	$0.00	$194,934.00
TOTAL	$378,654.00	$260,694.00	$100,000.00	$350,000.00	$575,310.00	$787,276.00	$180,000.00	$2,631,934.00

Community & Economic Development Department
Community Planning & Housing Division

45th Year Community Development Block Grant (CDBG) and
25th Year HOME Investment Partnerships (HOME)

ONE YEAR ACTION PLAN
2019-2020

July 15, 2019

Amended April 27, 2020
Amended February 15, 2021

EQUAL HOUSING
OPPORTUNITY

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Executive Summary

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

1. Introduction

The City of Lakeland Community and Economic Development Department – Community Planning & Housing Division is awarded federal formula funds annually from the U. S. Department of Housing and Urban Development (HUD). As a condition of awarding these funds, the City is required each year to develop a one-year Action Plan that outlines the community development goals on which it will focus these funds. The Plan covers the period of October 1, 2019 through September 30, 2020. During this period, the City has been awarded the following Federal Formula funds:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)

Programs and activities in this plan are intended to primarily benefit low and moderate income residents, neighborhoods with high concentrations of low and moderate income residents, and the city as a whole. HOPWA funds have been re-designated to the State of Florida Department of Health.

Due to the negative effects of COVID 19, the City of Lakeland continues to assist persons and households with their recovery. The City will provide rental and mortgage assistance along with partnering with community organizations for medical assistance and services for seniors and homeless.

2. Summarize the objectives and outcomes identified in the Plan

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

The 2019-2020 Action Plan includes the three goals outlines below, all targeting community needs related to affordable housing, suitable living environment and expand economic opportunities. The objectives and goals of the Five Year Consolidated Plan are to:

Objective #1: Provide affordable, safe, decent housing

Outcomes

- Preserve and maintain affordable housing by correcting substandard housing conditions;

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- Increase homeownership opportunities for low to moderate income individuals through affordable homes construction and down payment assistance;
- Increase rental housing units through partnerships with the public housing authority and private sector investors; and
- Assist in the provision of persons and/or families at risk of becoming homeless and those homeless to obtain affordable housing.
- Provide rental and mortgage assistance to households which also include utility assistance for persons affected by the national emergency declaration (on March 13, 2020) due to the COVID-19 health crisis.

Objective # 2: Establish and maintain a suitable living environment

Outcomes

- Improve safety and livability of neighborhoods;
- Improve housing and neighborhood conditions for homeowners and renters through code enforcement;
- Provide infrastructure improvements, including streets and sidewalks; and
- Increase access to quality facilities and services.

Objective # 3: Expand economic opportunities

Outcomes

- Empower low income persons to achieve self-sufficiency; and
- Assist in providing employment opportunities to low income persons in areas affected by those programs and activities covered by the Plan.
- As the City of Lakeland continues to work toward addressing the needs of the community, there continues to be a major demand for funding to address other national priorities. Like other HUD grant entitlements, the City of Lakeland is faced with providing more services to a growing population and a reduction in local and state resources.

3. Evaluation of past performance

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

In the previous year, the City of Lakeland has shown major progress in its efforts to implement its programs. The City is in compliance with HUD regulations and continues to deliver housing and community development services in an efficient manner.

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The City has successfully funded housing preservation and production through housing rehabilitation program by repairing homes and reconstructing homes on the same lot, if needed, with more energy efficient homes. The funds also assisted with Code Enforcement efforts and public services activities. The City has produced affordable housing units for first time homebuyers through its down payment assistance program.

The City has been successful in implementing these programs in the past and anticipates the continuation of such programs in the future. The City is strategically planning to make available vacant city owned buildable lots to produce more new construction housing. The City will use CDBG and HOME funds to make these programs worthy and to meet the goals and objectives identified in the Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Lakeland is required by the U.S. Department of Housing and Urban Development (HUD), pursuant to 24 CFR 91.105, to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and use of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds. The citizen participation plan is an important part of the five-year Consolidated Plan and may be amended over the life of that plan.

The process of developing and implementing the Consolidated Plan is broken into several different phases: development, amendments, and performance reporting. The citizen participation process is integrated into each of these phases.

The City strives to keep all interested parties informed about the opportunities for involvement in each phase of the Consolidated Plan process, including opportunities to comment on all proposed Consolidated Plan submissions to HUD, any substantial amendments and the Consolidated Annual Performance and Evaluation Report (CAPER).

Due to the urgency of COVID 19, HUD has waived the 30-day public notice period and requires 5-day comment period for substantial change to the Action Plan or Consolidated Plan.

5. Summary of public comments

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

At the May 13, 2019 public meeting, there were twenty-five (25) community members in attendance as well as the District's Commissioner, and the Southeast District Commissioner. After the presentation, there were questions asked regarding the expenditures, city investment properties, city funding other

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departments within the city, low income qualifications and first-time home buyer information. Staff answered the questions accordingly.

On May 23, 2019, an Affordable Housing Advisory Committee meeting was held. The prior year accomplishments were reviewed, and the projected use of funds was outlined. There were questions regarding the proposed budget items. Staff replied.

On June 17, 2019, a presentation was presented at the City Commission meeting. There were several questions regarding the amount of CDBG carryover; the CDBG deadline, use of funds for code enforcement and cost of new construction homes. Staff answered the questions. One Commissioner complemented the Staff on the work being done in the low-income communities and adding the new strategy of new construction to the Action Plan.

New Projects proposed were presented to the City Commission during a Special Called meeting on April 27, 2020. The new projects are: (1) rental and/or utility assistance and; (2) mortgage foreclosure prevention and housing counseling.

There were questions and concerns from the public:

1. Citizens double dipping of benefits of Federal stimulus payment as well as unemployment benefits.
   Staff replied that documentation of will be required for income qualification for clients. The stimulus payment is considered as an asset; no income. If unemployment benefits are received from the State; it is considered income. If CARE unemployment benefits are received is not counted.
2. There were several comments on the money being expend on road diet (roadway) could be better used with the City when people ae hurting and in need.
   These projects are funded by FDOT and crash data has been collected with important safety concerns to support the projects.

On September 15, 2020, the City was awarded CDBG CV3 funds of $787,276. On February 3, 2021, there was a public notice issued for comment period from February 3-9, 2021. This public notice also included notice of City Commission meeting held February 15, 2021.

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

All comments and views were accepted.

7. Summary

N/A

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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	LAKELAND	Community and Economic Development/ Community Planning & Housing Division
HOME Administrator	LAKELAND	Community and Economic Development/ Community Planning & Housing Division

Table 1 – Responsible Agencies

Narrative (optional)

The Community Planning & Housing Division – Housing Section of the City of Lakeland, under the general direction of the Community and Economic Development Department, will be the lead agency for preparing and implementing the Plan. The Housing Section coordinated its planning efforts among many local partner organizations to ensure that the goals outlined in the plan are met in a manner consistent with the stated performance measures.

As part of the Plan development process, input on housing, community development and support service needs, issues and initiatives were solicited from citizens and organizations. Community Planning & Housing Division has and will continue to create partnerships with non-profit developers, Community Housing Development Organizations (CHDOs), social service providers and other units of local government to expand the City's ability to provide affordable housing and community development programs.

The Community Planning & Housing Division also obtained information on housing and community development needs and issues through participation of housing advocacy groups and support service organizations, including the Affordable Housing Advisory Committee, Rebuild Polk After Disaster, Homeless Coalition of Polk County and Polk County Department of Health provided information on people with HIV/AIDS and lead based-paint poisoning, neighborhood associations, representatives of health and human services agencies. The City of Lakeland worked with the Lakeland Housing Authority and other housing and support service organizations on grant applications, plan compliance reviews and the certification of consistency process.

Public meetings and hearings were held to obtain input from citizens and community leaders in preparing the Action Plan for 2019-2020. A list of the organizations contacted is included in Table 2.

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The Community Planning & Housing Division Staff also regularly attends and participates with groups such as Homeless Coalition of Polk County, City's Neighborhood Association Coalition Meetings and Mid-Town Community Redevelopment Agency to improve methods of delivery and initiate systematic improvements in certain service sectors.

Consolidated Plan Public Contact Information

Inquiries, comments or complaints concerning the Consolidated Plan, any amendments or performance reports may be conveyed by contacting City staff at:

City of Lakeland

Community Planning & Housing Division

1104 Martin Luther King, Jr. Avenue

Lakeland, FL 33805

863/ 834-3360

863/ 834-6266 (fax)

Housing@lakelandgov.net

Business hours: 8 am – 5 pm (Monday – Friday)

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

1. Introduction

The Community Planning & Housing Division, under the general direction of the Community and Economic Development Department will be the lead agency for preparing and implementing the Plan. The Community Planning & Housing Division coordinated its planning efforts among many local partner organizations to ensure that the goals outlined in the plan are met in a manner consistent with the stated performances measures.

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))

The City is committed to the close coordination of all its programs with other City departments, local nonprofit partners, housing developers and the private sector. Housing Staff will continue to participate in events and planning sessions of the local housing authority, private housing developers and health and social service agencies.

Staff participates in various community meetings, throughout the county, such as Permanent Supportive Housing workshop. Staff meets regularly with groups such as the Homeless Coalition of Polk County and Rebuild Polk After Disaster.

The City has an ongoing relationship with the Lakeland Housing Authority (LHA). The City also supports the LHA Self Sufficiency and Youth Build projects.

The City provides several health and social service agencies with CDBG and City general funds through the public/community service application process. The coordination and participation of the City are all efforts to improve service delivery and initiate systematic improvements for low income and underserved population.

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 City of Lakeland is an active partner with the Homeless Coalition of Polk County. The City's strategy for addressing chronic homelessness includes working with providers of emergency housing, transitional housing, and permanent housing for the homeless in Lakeland. Exhibit 1 of the Continuum of Care may be viewed at **www.polkhomeless.org**.

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The HCPC coordinates with homeless service providers to circulate information regarding grants and funding available through HUD for permanent housing and transitional living programs. The Coalition is the organizing agency in the development of Exhibit 1 of the Grant Application for the McKinney-Vento Act Funds. The Coalition has successfully sought grant funds for the Continuum of Care, State of Florida and the Department of Children and Families. The Coalition works closely with Department staff to further assist the homeless or persons threatened with homelessness. These grant funds have been distributed to member agencies that applied for funds through the Homeless Coalition of Polk County.

The City's Housing staff works closely with the Homeless Coalition's Director and is a member of the executive board committee. The City continues to participate as a member and on various committees in support of the Homeless Coalition of Polk County, Inc. Additional support to existing programs is given each year by awarding public services and community services grants to support the Coalition and local member organizations. The City awarded a RFP to consultant to strategize ways to assist the services delivered to the homeless population. The outcomes of the study have encouraged the City to budget funds for two community outreach persons and rapid re-housing rental assistance.

Lack of funds to end chronic homelessness is one of the largest barriers to success. The current inventory in the Lakeland and Polk County Continuums of Care show that the majority of emergency and transitional housing shelter beds for individuals are located in Lakeland. Similar statistics exist with regards to families, with the majority of the beds for families with children located in Lakeland.

In today's economy, HCPC and other agencies are seeing more families with children seeking affordable housing. The City in partnership with homeless providers, local housing authority and affordable housing developers seek methods of assisting extremely low and very low income people. Wages have not kept pace with the cost of housing and utilities for the families that are low income. The City partners with Lakeland Habitat, Keystone Challenge (CHDO) and the Lakeland Housing Authority and other affordable housing developers.

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

The City of Lakeland does not receive or administer the Emergency Shelter Grant.

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

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Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Lakeland Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
2	**Agency/Group/Organization**	Homeless Coalition of Polk County
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
3	**Agency/Group/Organization**	Keystone Challenge Fund
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
4	**Agency/Group/Organization**	Lakeland Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview

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5	**Agency/Group/Organization**	Affordable Housing Advisory Committee
	Agency/Group/Organization Type	Services - Housing Social Services
	What section of the Plan was addressed by Consultation?	Public Housing Needs Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting

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

N/A

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	Homeless Coalition of Polk County	Goals do not overlap
City of Lakeland Ten Year Comprehensive Plan	City of Lakeland	Goals do not overlap
City of Lakeland CRA Plan	City of Lakeland	Goals do not overlap
LHA Five Year and Annual Plan	Lakeland Housing Authority	Goals do not overlap
Polk County Neighborhood Services Con Plan	Polk County Neighborhood Services Division	Goals do not overlap
Central Florida Planning Council	Regional Planning	Goals do not overlap
City of Lakeland Local Housing Assistance Plan	City of Lakeland	Goals do not overlap

Table 3 – Other local / regional / federal planning efforts

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Narrative (optional)

The City of Lakeland partners with many local non-profit agencies in the community. City of Lakeland also has a relationship with Polk County's Housing and Neighborhood Development Office, in its efforts to support the goals of the provision of affordable, safe and sanitary housing; a suitable living environment, and expanded economic opportunities for low and moderate income persons.

The City of Lakeland may increase the awarded amounts to several non-profits agencies who provided direct services to persons/households affected by the COVID-19 virus such as service to the elderly, health care and mental health services.

The City of Lakeland was awarded an additional $787,276 to prevent, prepare for, and respond to the COVID 19 virus. The funds will be utilized to aid persons, households and non-profit organizations to address the negative effects of the virus. To keep families in their homes, the City is administering its CARE Programs for rental, mortgage and utility assistance. To assist businesses and communities, the City has engaged several non-profits to provide services to low income persons, medical assistance, and services to seniors and homeless persons.

The City of Lakeland carries out the activities outlined in the Consolidated Plan through interdepartmental coordination. The City will continue to encourage relationships between other local municipalities, builders, developers, and advocates for low-income persons.

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AP-12 Participation – 91.105, 91.200(c)

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

The City of Lakeland is required by the U.S. Department of Housing and Urban Development (HUD) pursuant to 24 CFR 91.105 to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and use of CDBG and HOME funds. The citizen participation plan is an important part of the five-year Consolidated Plan and may be amended over the life of that plan.

Amendments to Final Statement

The City may decide not to carry out an activity described in the final statement, or to include an activity not previously described, or to substantially change the purpose, scope, location or beneficiaries of an activity. Prior to the City Commission taking action to amend the final statement, the Community Development Department shall require a public notice to be published in a local newspaper at least seven days prior providing citizens with notice and the opportunity to comment on the proposed amendment. The City Commission shall consider citizen comments and, if appropriate, may modify the proposed changes. In the event the Commission approves an amendment, the Department shall publish a public notice of the amended final statement.

Substantial Change Criteria

A substantial change includes the cancellation of a previously approved activity, the addition of an activity not previously described, or a change in the purpose, scope, location or beneficiaries of an activity. A substantial change as described above requires an amendment to the City's final statement. The City shall provide sufficient public notice and shall hold a public hearing where citizens will be given an opportunity to provide comments.

Annual Performance Report

Each year HUD requires that the City compile a Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days of the end of the fiscal year. The report provides programmatic and financial data on the progress with which the federal grant programs were implemented during the fiscal year.

At least fifteen days prior to submitting the report to HUD, the City will publish a public notice in the local newspaper announcing the availability of the report for review by the public. After the public comment period, the City shall consider any comments received and a summary of the comments shall be attached to the report when submitted to HUD.

Efforts made to Broaden Public Participation

The Planning & Housing Division Staff attends and participates in different community forums throughout the year, such as Public Works Week. This informal method allows the staff to inform the public and organizations of our mission. Other Public meetings were held to obtain input from all sectors of the community.

Currently, there are no local newspapers for the African American or Hispanic neighborhoods. Over 250 postcards were mailed to the local minority community, public service agencies, and neighborhood associations and distributed to all interested city departments to announce the public meeting on May 13, 2019. The notices were posted in the local newspaper regarding the public hearings at the City Commission meetings. Staff attends various meetings and service providers' activities to hear the needs and views of the community.

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	Newspaper Ad	Non-targeted/broad community	April 29, 2019. N/A	N/A	N/A	
2	Request for Proposal	Non-Profit Organizations	February 11, 2019/29applications received	N/A	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)
3	Public Meeting	Low income census tract community	May 13, 2019/ 25 attendees	Review of accomplishments for projected use of funds. Expenditures and carryover amounts, vacant city properties, low income definition, Home purchase. Staff answered all questions and/or directed to correct department.	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)
4	Public Meeting	Non-targeted/broad community	May 24, 2019/6 attendees	Review of plan by AHAC/recommend public services. Questions regarding expenditures deadlines, new construction strategy and approved the recommendation of public services agencies.	N/A	
5	Internet Outreach	Non-targeted/broad community	June 13 to July 12, 2019/ N/A	N/A	N/A	http://www.lakelandgov.net/departments/community-development/housing/
6	Newspaper Ad	Non-targeted/broad community	June 13, 2019/N/A	N/A	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)
7	Public Hearing	Non-targeted/broad community	June 17, 2019/Regular meeting	Public hearing with City Commissioners and general public. Questions regarding expenditures deadlines and lack of contractors.	N/A	
8	Public Hearing	Non-targeted/broad community	July 15, 2019/TBD	TBD	N/A	
9	Newspaper Ad and City's website	Non-targeted broad community	April 20-27, 2020	TBD		
10	Public Hearing	Non-targeted/broad community	April 27, 2020	TBD		
11	Newspaper Ad and City's website	Non-targeted broad community	February 3-9, 2021	TBD		

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)
12	Public Hearing	Non-targeted broad community	February 15, 2021	TBD		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Lakeland is awarded an allocation of CDBG funds each year which, for 2019-2020 is $935,111, and anticipates $2,500 in program income. CDBG funds may be used for housing and community development activities including housing rehabilitation, public services, code enforcement and administration of the City's CDBG program.

The City was awarded an additional $575,310 of CDBG-CV through the Coronavirus Aid, Relief and Economic Security (CARES) Act to be expended to assist persons, households and business impacted by this national emergency. The funds will provide emergency relief in the form of rental and/or utility payments, foreclosure prevention and intervention counseling, and public services such as health care and mental health and senior programs.

The City was awarded CDBG CV3 funds of $787,276 to assist persons, households and businesses. The funding will continue to assist with rental, mortgage and utility assistance to the households in danger of being evicted due to loss or reduced income. In addition, it will assist non-profit organizations to provide medical assistance and services for seniors and homeless persons.

The City of Lakeland also is awarded HOME funds in the amount of $362,966 and anticipates an approximate amount of $5,000 for program income. The City has added a new strategy with the development of new housing in addition to housing preservation. The amount anticipated for the State of Florida State Housing Initiatives Partnership (SHIP) program is a 20% increase for 2019-2020. There has been a considerable decrease in the state's funding over the past few years: In 2018, it was a 66% decrease from 2017. HOME and SHIP funds may be used for housing activities such as increasing homeownership, housing rehabilitation, new construction and administration of the City's HOME and SHIP programs and CHDO support. The city's General fund and the Community Redevelopment Agency (CRA) funds may be utilized for impact fee reimbursements/waiver for multi-family housing developments.

The CRA has also committed to expend funds for owner occupied rehabilitation, down payment assistance and development of new construction programs in targeted CRA areas.

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	935,111	2,500	600,000	1,537,611	1,537,611	Anticipated one-year annual CDBG allocation
CDBG-CV	Public federal	Admin, housing, public services	575,310			575,310	575,310	Anticipated one-year annual CDBG allocation
CDBG-CV3	Public federal	Admin, housing, public services	787,276			787,276	787,276	Anticipated one-year annual CDBG allocation

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	362,966	5,000	0	367,966	367,966	Anticipated one-year annual HOME allocation

Table 5 - Expected Resources – Priority Table

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

The City's Community Planning & Housing Division seeks other grant funding sources to leverage with existing state, federal and general funds. The City was awarded $2,005,781 in 2009 and $1,303,139 in 2011 from HUD's Neighborhood Stabilization Program (NSP) to acquire, rehabilitate and sell foreclosed and abandoned homes and Community Development Block Grant – Recovery to stimulate the suffering economy. Staff has closed out the NSP3 grant with approximately $242,000 program income that was expended on eligible community development activities and working to close NSP1. The City will meet its HOME match requirements with the State funds available, local impact fees waivers and/reimbursement to non-profit developers, discounted homesteading lot program and other local contributions

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 City Departments (Housing, Community & Economic and CRA) are coordinating efforts to create a list of buildable city-owned properties to address the new strategy of new construction in this plan.

Discussion

The City is awarded federal funds from HUD and an annual award from the State of Florida State Housing Initiatives Partnership (SHIP) program. The SHIP amount varies each year. The City also allocates local funds to public services agencies along with waiving local non-utility impact fees for multi- family housing developments.

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	Affordable Housing	2015	2020	Affordable Housing	City Wide	Preserve and maintain affordable housing	CDBG: $2,144,646 HOME: $254,446	Homeowner Housing Rehabilitated: 15 housing household unit /Homeowner housing added: 2 household housing unit/Rental and Mortgage Assistance: 280 units
2	Quality of life	2015	2020	Non-Housing Community Development	City Wide Code enforcement	Code Enforcement Safety of Neighborhoods Infrastructure Improvements Facilities and Services	CDBG: $481,874 HOME: $0	Public service activities other than Low/Moderate Income Housing Benefit: 3500 Persons Assisted Housing Code Enforcement/Foreclosed Property Care: 3074 Household Housing Unit Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 25 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Self Sufficiency	2015	2020	Affordable Housing	City Wide	Preserve and maintain affordable housing Increase homeownership	CDBG: $50,000 HOME: $113,520	Housing Counseling: 600 sessions Direct Financial Assistance to Homebuyers: 5 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	Affordable Housing
	Goal Description	Quality affordable housing, Temporary relocation, clearance and demolition, Housing Rehab Delivery, Rental Assistance, Mortgage Assistance
2	**Goal Name**	Quality of life
	Goal Description	Code enforcement, blight and elimination, Public Services, Infrastructure
3	**Goal Name**	Self Sufficiency
	Goal Description	Affordable Housing, Home Purchase Assistance, Community Housing Development Organization, Mortgage Foreclosure Prevention Housing Counseling

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Lakeland's Action Plan outlines its planned actions for the 2019-2020 to support housing and community development for the City's low- and moderate-income populations, as well as the City's homeless and special needs groups.

The Community Planning & Housing Division, under the direction of the Community & Economic Development Department, will continue to administer its Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) affordable housing programs. The City will continue to provide funding for affordable housing rehabilitation, development of new housing and home purchase assistance as well as coordinating efforts of social service providers to enhance the quality of life for persons at 80% and below of the area median income.

Projects

#	Project Name
1	Owner Occupied Rehabilitation
2	Home Purchase Assistance-HOME funds
3	Temporary Relocation
4	Clearance and Demolition
5	Housing Rehabilitation Staff-Activity Delivery
6	Code Enforcement
7	General Program Administration
8	Community Housing Development Organization
9	Simpson Park Summer Recreation Program
10	Coleman Bush Building Summer Tutoring
11	Coleman Bush Building Fall Tutoring
12	Coleman Bush After School Youth Programs
13	Simpson Park Art Classes
14	Simpson Park Dance Lesson
15	Simpson Park Summer Swimming Lessons
16	Boys and Girls Club Summer and After School Programs
17	Lakeland Volunteers in Medicine
18	Peace River Center for Personal Growth, Inc
19	Talbot House Ministries
20	The Salvation Army
21	Volunteers in Service to the Elderly (VISTE)
22	Wilson House, Inc

#	Project Name
23	Choctaw Avenue Sidewalk Project
24	New Construction – HOME funds
25	CDBG -CV Housing – Staff Activity Delivery
26	CDBG-CV Rental and Utility Assistance
27	CDBG-CV Housing Counseling (Mortgage Foreclosure Prevention)
28	CDBG-CV Public Services
29	CDBG-CV3 Administration
30	CDBG- CV3 Staff Activity Delivery
31	CDBG -CV3 Rental Assistance
32	CDBG-CV3 Public Service
33	CDBG -CV3 Mortgage Assistance

Table 7 - Project Information

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

Allocations are typically used to address high priority needs, as identified in this plan, on a citywide basis for projects primarily benefiting low and moderate income households. The basis for assigning priority given to each category of priority needs (include relative priority, where required,) was a series of focus group meetings with providers of housing and community services, public meetings and public hearings. Input from the local housing authority and other City and Planning documents were also considered. HOPWA assistance shall be provided throughout the Lakeland/Winter Haven EMSA or Polk County wide.

Due to COVID-19 health crisis, the City will be assisting persons and/households who have loss of employment, furlough of employment, and/or reduced hours with rental and/or utilities assistance along with foreclosure prevention counseling. The City may re-allocate un-encumbered CDBG funds to assist these two new projects.

The primary obstacle to addressing underserved needs continues to be the diminishing availability of funds and the increasing requests of funding needs from non-profit agencies providing services to low and moderate income individuals. During the 2019-2020 RFP process, the City received funding proposals for requesting over $2.4 million, in which only an estimated $1.9 million was projected to be available.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	Owner Occupied Rehabilitation
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: $565,737
	Description	Housing program provides major rehabilitation and emergency repair for owner-occupied housing for low income home buyers.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated fifteen (15) low income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Single unit detached housing rehabilitation
2	**Project Name**	Home Purchase Assistance-HOME funds
	Target Area	City-Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Preserve and maintain affordable housing
	Funding	HOME: $50,000
	Description	Provide down payment and closing cost assistance to low income home buyers. Homes purchased must be within the city limits of Lakeland.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated five (5) low income families

	Location Description	City of Lakeland, FL city limits
	Planned Activities	Down payment and closing cost assistance
3	**Project Name**	Temporary Relocation
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: $10,000
	Description	Temporary relocation for clients benefiting from the city's owner-occupied rehabilitation.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated five (5) low income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Temporary relocation assistance for clients benefiting from the City's owner-occupied rehabilitation program.
4	**Project Name**	Clearance and Demolition
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: $5,000
	Description	Clearance, demolition and removal of accessory building and improvement including movement of structure to other sites.
	Target Date	09/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Estimated two (2) low income households.
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Clearance and demolition for blighted properties.
5	**Project Name**	Housing Rehabilitation Staff-Activity Delivery
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: $200,000
	Description	Funds are budgeted to administer the Neighborhood Services Housing Section, owner occupied rehabilitation program. This includes activity delivery for CDBG and other low- income rehabilitation activities.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low income families
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Housing Rehabilitation Staff Activity Delivery.
6	**Project Name**	Code Enforcement
	Target Area	Code enforcement
	Goals Supported	Quality of life
	Needs Addressed	Code enforcement
	Funding	CDBG: $57,637

	Description	Code Enforcement as it relates to demolition, housing and environmental code violations, fire inspections, overgrowth/care of premises, and abandoned vehicles.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Three thousand seventy-four (3,074) City of Lakeland residents in targeted census tracts
	Location Description	City of Lakeland, FL Census tracts 110, 111, 112.02, 112.03, 112.04, and south 1/2 of 113, 120.02, & 164
	Planned Activities	Costs incurred for inspection code of violations and enforcement of codes.
7	**Project Name**	General Program Administration
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: $125,000 HOME: $36,297
	Description	General program administration involving the oversight, monitoring and coordination of Community Development Block Grant Program and related activities. Payroll and benefits of staff involved in administration and costs for the provision of CDBG and HOME programs and information to the public. General program administration and project soft costs.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twenty-three (23) low income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Administration of housing programs

8	**Project Name**	Community Housing Development Organization
	Target Area	City-Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Preserve and maintain affordable housing
	Funding	HOME: $63,520
	Description	Housing acquisition and rehabilitation/reconstruction
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated one (1) unit.
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Reconstruction or rehabilitation of a single family unit
9	**Project Name**	Simpson Park Summer Recreation Program
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $31,350
	Description	This structured summer recreation program provided by the City of Lakeland's Parks and Recreation Department will provide activities for the youth.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One hundred (100) low income families
	Location Description	1725 Martin L. King Jr. Ave, Lakeland, FL 33805

	Planned Activities	Youth Summer Camp
10	**Project Name**	Coleman Bush Building Summer Tutoring
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $3,200
	Description	Summer tutoring for low income households
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low income families
	Location Description	1104 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	Summer tutoring
11	**Project Name**	Coleman Bush Building Fall Tutoring
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $11,300
	Description	After school tutoring for low income households.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Sixty (60) low income families
	Location Description	1104 Martin L. King Jr. Ave., Lakeland, FL 33805

	Planned Activities	After school tutoring.
12	**Project Name**	Coleman Bush After School Youth Programs
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $3,687
	Description	After school dance, keyboard and Life Skills
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Eleven (11) low income families
	Location Description	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	Planned Activities	Youth Activities
13	**Project Name**	Simpson Park Art Classes
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $2,740
	Description	After school art classes
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred fifty (250) low income families
	Location Description	1725 Martin L. King Jr. Ave, Lakeland, FL 33805

	Planned Activities	After School art classes
14	**Project Name**	Simpson Park Dance Lesson
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $2,180
	Description	Dance classes
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred fifty (250) low income families
	Location Description	1725 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	Dance classes for youth
15	**Project Name**	Simpson Park Summer Swimming Lessons
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $4,200
	Description	Swim Classes
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One hundred five (105) low income families
	Location Description	1725 Martin L. King Jr. Ave, Lakeland, FL 33805

	Planned Activities	Swimming lessons for youth
16	**Project Name**	Boys and Girls Club Summer and After School Programs
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $10,000
	Description	Programs proved a safe environment with the summer camp and after school program for low income, at risk youth at two (2) location.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Eighty (80) low income families
	Location Description	1525 Martin L. King Jr. Ave., Lakeland, FL 33805
	Planned Activities	Summer camp and after school programs for children.
17	**Project Name**	Lakeland Volunteers in Medicine
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $20,000
	Description	A Non-profit agency provides medical care for the working uninsured with volunteers.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One thousand (100) working uninsured Lakeland residents

	Location Description	600 W Peachtree St, Lakeland, FL 33815
	Planned Activities	Healthcare for the working uninsured.
18	**Project Name**	Peace River Center for Personal Development, Inc
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $7,986
	Description	Immediate crisis mental health services
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twelve (12) children, adolescents, and adults
	Location Description	1831 Gilmore Ave, Lakeland, FL 33801
	Planned Activities	Mental Health services
19	**Project Name**	Talbot House Ministries
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $10,000
	Description	Help pay utility costs for the agency location.
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Four hundred (400) low income and homeless persons

	Location Description	814 N Kentucky Ave., Lakeland, FL 33801
	Planned Activities	Assist with utility costs
20	**Project Name**	The Salvation Army
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $10,000
	Description	Rapid rehousing assistance to the families living in the SA Emergency Family Shelter and engaged in the Pathway of Hope
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) Low income families
	Location Description	2620 Kathleen Rd, Lakeland, FL 33810
	Planned Activities	Case management and financial assistance.
21	**Project Name**	Volunteers in Service to the Elderly (VISTE)
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: $20,000
	Description	Agency working with volunteers to prepare and deliver hot meals to low income, frail and elderly residents.
	Target Date	09/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Two hundred sixty-six (266) frail and elderly residents
	Location Description	City of Lakeland, City Limits
	Planned Activities	Deliver hot meals to elderly
22	**Project Name**	Wilson House, Inc
	Target Area	City Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Facilities and Services
	Funding	CDBG: $10,000
	Description	Agency working with homeless, chronic male substance abuser in Lakeland
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	• Thirty-seven (37) male, chronically homeless, substance abuser
	Location Description	510 Wildlife Trail. Lakeland, FL 33809
	Planned Activities	Counseling services
23	**Project Name**	Choctaw Avenue Sidewalk Project
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Infrastructure Improvements
	Funding	CDBG: $77,558

	Description	Construct a 6’ sidewalk that will include reconstructing existing driveway aprons and curb ramps
	Target Date	09/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Twenty-five (25) low income households
	Location Description	City of Lakeland, FL, Census Tract 109
	Planned Activities	Costs incurred for Sidewalk construction
24	**Project Name**	New Construction (HOME funds)
	Target Area	City Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Increased Homeownership
	Funding	HOME: $204,000
	Description	Construction of new housing for low income families
	Target Date	09/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) low income households
	Location Description	City of Lakeland, FL
	Planned Activities	New construction
25	**Project Name**	CDBG-CV Housing- Staff Activity Delivery
	Target Area	City wide

	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and Maintain Affordable Housing
	Funding	CDBG-CV $50,000
	Description	CDBG-CV Funds are budgeted to administer the rental assistance and housing counseling activities.
	Target Date	09/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred (200) rental households to low income clients and six hundred (600) for housing counseling sessions.
	Location Description	City of Lakeland, FL
	Planned Activities	Rental and Utility Assistance
26	**Project Name**	Rental and Utility Assistance
	Target Area	City wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and Maintain affordable housing
	Funding	CDBG: $725,300
	Description	Provide rental and utility assistance to persons and/or household due to COVID-19 loss of employment, reduction of hours; furlough of job
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred (200) low income households
	Location Description	City of Lakeland

	Planned Activities	Rental and Utility Assistance.
27	**Project Name**	Housing Counseling for Mortgage Foreclosure Prevention
	Target Area	City wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and Maintain Affordable Housing
	Funding	CDBG-CV $50,000
	Description	Provide housing counseling for household to prevent foreclosure of mortgage
	Target Date	April 1, 2020 to December 31, 2020
	Estimate the number and type of families that will benefit from the proposed activities	Six hundred (600) Counseling Sessions
	Location Description	City Wide
	Planned Activities	Provide counseling sessions for the prevention of mortgage foreclosure.
28	**Project Name**	CDBG-CV Public Services
	Target Area	City wide
	Goals Supported	Facilities and Services
	Needs Addressed	Public Services
	Funding	CDBG-CV $75,000
	Description	CDBG-CV Waiver to eliminate the 15% cap on public services to use CDBG-CV funds for various public services during the 2019-2020 program year to address the local results of the COVID -19.
	Target Date	09/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that the proposed CDBG-CV Public Services activities will benefit 1,500 persons.
	Location Description	City of Lakeland, FL
	Planned Activities	Provide direct services to homeless, mental and medical health services to persons affected by the COVID virus.
29	**Project Name**	CDBG-CV3 Administration
	Target Area	City wide
	Goals Supported	Preserve and maintain affordable housing
	Needs Addressed	Preserve and Maintain Affordable
	Funding	$75,000
	Description	General program administration involving the oversight, monitoring and coordination of Community Development Block Grant Program and related activities. Payroll and benefits of staff involved in administration and costs for the provision of CDBG program and information to the public. General program administration and project soft costs.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One hundred (100) families will be assisted.
	Location Description	City wide
	Planned Activities	Administration of housing rental program
30	**Project Name**	CDBG-CV3 Staff Activity Delivery
	Target Area	City wide

	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and Maintain Affordable Housing
	Funding	$100,000
	Description	Funds are budgeted to administer the rental assistance and housing counseling activities.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Seventy five (75) low income households
	Location Description	City of Lakeland, FL
	Planned Activities	Staff Activity Delivery cost
31	**Project Name**	CDBG-CV3 Rental Assistance
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain Affordable Housing
	Funding	$262,276
	Description	Provide rental and utility assistance to person and/or households due to COVID-19 loss of employment, reduction of hours, furlough of job
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Seventy five (75) low income households
	Location Description	City of Lakeland, FL

	Planned Activities	Rental and Utility Assistance
32	**Project Name**	CDBG -CV3 Public Services
	Target Area	City wide
	Goals Supported	Facilities and Services
	Needs Addressed	Public Services
	Funding	CDBG-CV3 $200,000
	Description	CDBG-CV Waiver to eliminate the 15% cap on public services to use CDBG-CV funds for various public services during the 2019-2020 program year to address the local results of the COVID -19.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen thousand (15,000) persons.
	Location Description	City Wide
	Planned Activities	Provide direct services to low income households, homeless, and medical health services to persons affected by the COVID virus.
33	**Project Name**	Mortgage Assistance
	Target Area	City wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and Maintain Affordable Housing
	Funding	$150,00
	Description	Funds are budgeted to administer the mortgage assistance to low income persons who are laid off and reduced work hours due to COVID 19
	Target Date	09/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Twenty-five (25) low income households
	Location Description	City wide
	Planned Activities	Mortgage and Utility Assistance

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

The geographic areas of the City in which the CDBG funding will be invested consist of the areas identified by Census Tract. There are several areas that have high percentages of low income residents. That is, the census tracts identified contain the highest concentration of low income families. The population of the remaining low-income tracts is between 13 and 55 percent minority. The majority of the population in the census tracts is low to moderate income.

Although the City of Lakeland's programs are city wide, the vast majority of funds are spent within the census tracts outlined in colors in the map. For PY 2019-2020 as in prior years, the Community Planning & Housing Division anticipates expending the majority of the funds in the census tracts through various housing programs and public services activities.

Geographic Distribution

Target Area	Percentage of Funds
City-Wide	100
Code enforcement	7

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Census Tracts where 51% of the individuals meet HUD's low/moderate income standards (80% or less of the area median income) are identified as target areas for investment.

Assistance will also be made available citywide to persons meeting the CDBG eligibility requirements for low- and moderate income benefit. While the City of Lakeland estimates the percentage of funds to be directed to low- and moderate-income areas or citywide, the City has not estimated the percentage of funds to be directed to specific areas.

Discussion

The City will concentrate its efforts on owner occupied rehabilitation, new construction, home purchase assistance and public supportive services to benefit the low to moderate income clients citywide. The CBDG-CV funds will be utilized city wide to low/moderate income persons and/or households which had a loss of employment, reduction of hours or furloughed from employment because of the national emergency declaration. The City will provide rental and utility assistance to the general population citywide who are affected by the COVID-19 crisis. Those persons and households who income levels at

80% and below of the AMI.

The City was awarded CDBG-CV3 funds in the amount of $787,276 to assist persons, households and businesses. The funding will continue to assist with rental, mortgage and utility assistance to the households in danger of being evicted due to loss or reduced income. In addition, it will assist non-profit organizations to provide medical assistance and services for senior and homeless persons.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The Community Planning & Housing Division will concentrate its efforts on keeping families in their homes with its rehabilitation program There is a tremendous need for major and minor repairs of existing homes. The City will provide eligible households with homeownership assistance. There is nationwide wide shortage of affordable housing; therefore, the City will also focus on the development of new housing which may be single family or multi-family projects. With the most recent March 13, 2020 Presidential emergency declaration of the COVID-19 virus, the Housing Division is shifting its focus to assisting rental and utilities for those living in rental units and also with foreclosure prevention counseling for those with mortgages.

With its housing projects, Housing Division is committed to perform energy saving efforts such as R38 insulation, 15 SEER heating and cooling units; low E coating windows and low flow faucets and toilets.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	15
Special-Needs	2
Total	17

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	200
The Production of New Units	2
Rehab of Existing Units	15
Acquisition of Existing Units	5
Total	22

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

Discussion

The City will concentrate its efforts on owner occupied rehabilitation due to the age of existing stock, home purchase assistance and the development of new housing to assist families with self-sufficiency and public supportive services to benefit the low to moderate income clients citywide. The additional CV funds awarded will be utilized for rental & utility assistance along with much needed housing counseling for those households who may be facing mortgage foreclosure. With the CV3 funds, the City will continue to assist persons and households with rental, mortgage and utility assistance to prevent evictions from homes.

AP-60 Public Housing – 91.220(h)

Introduction

The City works with the Lakeland Housing Authority (LHA) on different projects during the program year.

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

The City and LHA offers their residents positive programs, undertaking by both entities. LHA provides homebuyer education and the City offers down payment and closing assistance. LHA offers the Family Self-Sufficiency and Youth Build Programs and the City supports these programs by signing the Certificate of Consistency. The City also provides funds for low income youth for scholarships at a local non-profits agency and many youths from the housing complexes take advantage of the after school and summer programs.

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

LHA is committed to providing families in assisted housing with opportunities for growth and development. All recipients of Section 8 rental assistance are provided counseling through a case management and supportive service referral program based on the Family Self-Sufficiency model. The mission of the Family Self-Sufficiency program is achieved through the coordination and the broadening of the existing resources to help low- and moderate-income persons to become economically independent and self-sufficient.

The City Staff encourages its general contractors to recruit residents of its housing complexes and Youth Build program with its Section 3 requirements. This would promote opportunities for clients to earn income to become homeowners. As mentioned above, LHA offers homebuyer education and the City provides down payment and closing assistance to clients.

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

The Lakeland Housing Authority is not designated as “troubled”.

Discussion

The City has a strong working relationship with the Lakeland Housing Authority with the support of its many services offered and also waiver of particular impact fees for their multiple family projects. Staff is part of the board of Youth Build and the City’s official signs off on LHA’s certifications of consistency for their programs. The City's staff assisted the LHA in its environmental review process for its proposed senior apartments.

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

Introduction

The City staff works closely with the local homeless and special needs providers to support their efforts in their programs.

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

Our homeless outreach one-year goals and actions are to:

- Examine the capacity of outreach efforts and expand services to meet demand.
- Create and deliver basic training for outreach volunteers, library employees, law enforcement, and other frontline service providers.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City's one –year goals and actions to address this issue are to:

- Develop a strategy to align the emergency shelter and transitional housing beds more closely with the needs over the next five years.
- Work with Polk County to determine if an emergency shelter outside the City of Lakeland would better serve the homeless. Currently, the only emergency shelters are located in the City of Lakeland.

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

The planned strategies to address this issue are to:

- Increase funding for rapid re-housing by working with GiveWell, the community foundation

serving Lakeland, to make rapid re-housing projects a funding priority.

- Prioritize rapid re-housing for CoC funding.
- Provide rapid re-housing with State funding.
- Evaluate current CoC transitional housing programs serving families for re-allocation of funding toward rapid re-housing.
- Continue to pursue State of Florida and private funding for rapid re-housing and multi-family projects.
- Working with other agencies to bring permanent supportive housing into Polk County.
- CoC to work with Public Housing Authorities on Section 8 and rapid re-housing.

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

The planned strategies to address this issue are to:

- Identify community prevention partners determining what each prevention partner group can best do for prevention and ensure processes and tools are in place to support prevention.
- Work with landlords to identify stability issues early and effective interventions to keep client housed.
- CoC develops and monitors CoC-wide goals emphasizing housing retention outcomes with results reported in annual performance-based rankings.
- CoC monitors provider housing stability providing technical assistance to poor performers as needed.
- Connect prevention programs coordinated entry allowing households to quickly access the services they need without having to call multiple programs.
- Pursue increased funding for homeless prevention projects including Florida Department of Children and Families Homeless Prevention Grant.

Discussion

The City supports the efforts of the homeless community with the support of the public service agencies. The City and Polk County have entered into an interlocal agreement to provide rapid-rehousing assistance. The City along with Polk County Housing and Neighborhood Development entered into a contract to provide rapid re-housing State funds to individuals and families who are homeless or at risk of homelessness. This strategy will be serviced by a local non-profit agency. This program year, the City is committing additional State funds to assist in a Rapid Rehousing Strategy. The City supports the local coordinated entry intake process with the goal of gaining access to housing and related services for the

underserved populations of veterans, youth and families. The most important goal of the system is to move individuals from homelessness to permanent stable housing as quickly as possible.

The special needs community is supported with the financial awards to public agencies and waiver of impact fees for special needs projects.

With the other COVID-19 funds awarded to the County and HCPC through ESG and COC, homeless persons and/or households are being assisted with basic needs.

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

Introduction:

The effect of City public policies on the cost of affordable housing may include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, impact fees, growth limits, and policies that affect the return on residential investment. The City has a review process in place for all City actions that may adversely impact the development of affordable housing. The following programs have been established to support affordable housing within the city limits**.**

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

Impact Fee Credits**-**All land development activity, regardless of type or location, may receive an impact fee credit for a structure which has been removed within the prior five years.

Impact Fee Exemptions-The City has in place impact fee exemptions targeted to a specific location. Through an interlocal agreement with Polk County, development in the Core Improvement Area is exempt from all County and City impact fees except water, wastewater, and fire service capacity fees.

Affordable Housing Incentive Plan-In 1992 when the State enacted the William E. Sadowski Affordable Housing Act, which provided a comprehensive funding package for affordable housing programs, local governments had to develop a "Local Housing Incentive Plan" to receive funds under the Act. The City appointed an Affordable Housing Advisory Committee (AHAC) which, through the Affordable Housing Incentive Plan, established the incentives to be provided to encourage the development of affordable housing. The incentives include:

- Expedited permitting for all affordable housing developers.
- Developers may request impact fee reimbursements if the unit is sold or rented to an eligible household.
- Eligibility for additional incentives that may be approved by the Affordable Housing Review Committee, including reduced road widths, and modifications in curbing, parking, or other site improvement features.

Code Enforcement Section is responsible for investigating and citing properties for code violations, boarding up abandoned buildings, demolishing unsafe structures, and maintaining vacant lots. Code Enforcement receives funding from both CDBG and the City's General Fund. Code Enforcement has a new computer system that allows the tracking of code violations by Census Tract.

Urban Homesteading Program-As a strategy to promote infill housing development in some of Lakeland's most distressed neighborhoods, the Urban Homesteading Program was developed. On vacant buildable

residential lots, the City shall continue to aggressively pursue title and marketability through foreclosure of special assessment liens and quiet title action. Funding for this effort is derived from the General Fund. The City shall maintain a list of City owned vacant lots suitable for single family construction where the property has marketable title and all back taxes have been paid in full. These lots shall be available for Urban Homesteading**.**

Accessory Dwelling Units-The City amended its Land Development regulations to allow accessory dwelling units (ADU) in residential zoning districts. ADUs may provide affordable units for retirees, single persons, couples and students while attending college or preparing to become independent.

Discussion:

N/A

AP-85 Other Actions – 91.220(k)

Introduction:

The City will perform the actions stated below to assist low to moderate income households and persons with affordable housing and social service needs.

Actions planned to address obstacles to meeting underserved needs

The Community Planning & Housing Division has identified several obstacles that will hinder its ability to address the identified needs in the five-year Consolidated Plan. These include the following:

The primary obstacle to meeting underserved needs in the City is the limited financial resources available to address identified priorities. For example, the amount of CDBG funds available under the 15% Public Service cap is consistently and significantly less than the amount requested to meet local goals. The State housing trust fund has fluctuated over the last several years. This fund complemented the federal funds coming into the community; but the SHIP funding has been reduced by 75% this program year.

With the CDBG-COVID-19 funds, the City has increased awards to those agencies who are able to assist the feeding for the elderly population, medical services to those who have lost medical coverage; and mental health counseling.

The obstacles to meeting housing needs revolve primarily around the rising cost of housing and need for additional affordable housing. While housing quality and non-housing factors play a role in the city's housing needs, housing cost burden is by far the leading challenge in the market. Moreover, the limited supply and rising cost of housing makes challenges like homelessness and living wages for low income households even more difficult to address. With the current COVID-19, there are over 443,000 unemployed as of March 2020 and which is a huge increase. Therefore, the housing shortage will become more crucial.

The City was awarded CDBG-CV3 funds in the amount of $787,276 to assist persons, households and businesses. The funding will continue to assist with rental, mortgage and utility assistance to the households in danger of being evicted due to loss or reduced income. In addition, it will assist non-profit organizations to provide medical assistance and services for seniors and homeless persons. The unemployment rate is still at record high due to the pandemic and families are displaced due to loss of income.

Actions planned to foster and maintain affordable housing

As stated in above paragraphs, the City will concentrate its efforts on keeping families in their homes with its rehabilitation program and the development of new housing. The City also will provide eligible

households with homeownership assistance.

The City's programs are committed to provide energy saving efforts such as R38 insulation, 15 SEER heating and cooling units, low E coating windows and low flow faucets and toilets.

The City will continue to support homeless service providers with public service funds in programs to assist households and prevent homelessness. The City supports local non-profit developers with waiver of impact fees, discounted lots and down payment assistance.

The local Community Redevelopment Agency has combined its housing programs with the Housing Division to provide comprehensive solutions to the efforts of housing crisis. The CRA has completed phase II of its construction on a plot of land for twenty-five units of single family homes located in a low income census tract for low to moderate income homebuyers.

Actions planned to reduce lead-based paint hazards

The City of Lakeland addresses lead-based paint hazards as part of the rehabilitation program. The City addresses any lead-based paint hazards pursuant to 24 CFR Part 35 Final Rule effective September 15, 2000. Qualified testers and risk assessment contractors are utilized for the work to be completed for lead based paint stabilization, detection, and abatement using safe work practices. HUD's lead-based paint regulations and requirements are fully incorporated into all of the City's rehabilitation and homebuyer activities.

Actions planned to reduce the number of poverty-level families

The goal of the City is to address issues relating to poverty through assistance to both outside agencies and City programs. Funded activities that provide assistance and training to lower income persons include: Salvation Army and Talbot House programs, Homeless Coalition of Polk County support, drug prevention activities, after school programs, summer teen activities, volunteers to assist elderly shut-ins, programs for persons with disabilities, counseling, and recreational programs for low-income children.

The Housing Assistance Program will continue to focus on training and counseling activities that help families become successful homeowners. The Affordable Housing Advisory Committee and the Housing Assistance Partnership Task Force will continue to oversee the implementation of housing programs and attempt to ensure affordable, decent housing for all residents. The City's single family rehab program helps lower income owners make needed repairs, which enables them to remain in their affordable homes and it has plans to increase its number of ownership and rental units through new development

The City's Staff maintains contacts with other agencies supplying services to low income residents such as the Lakeland Housing Authority, various homeless service agencies, and local non-profit agencies with

programs that benefit children and families.

The Lakeland Housing Authority operates the Family Self-Sufficiency and Section 8 FSS programs to promote the development of local strategies to coordinate the use of assistance under the public housing program with public and private resources, enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, and make progress toward achieving economic independence and self-sufficiency. The FSS program supports HUD's strategic goals of helping HUD-assisted renters make progress toward housing self-sufficiency, welfare reform and help families develop new skills that will lead to economic self-sufficiency. As a result of their participation in the FSS program, many families have achieved stable, well paid employment, which has made it possible for them to become homeowners or move to other non-assisted housing. The City signs LHA's certificate of consistency for its submission to funding sources.

City and Polk County have a contract with a local non-profit agency to provide rental and security deposits for households 30% and below of the Area Median Income.

All local non-profit agencies serving the homeless offer some level of supportive services to program participants, ranging from family counseling to job skill development, all of which are intended to promote self-sufficiency and prevent a return to poverty and homelessness.

Actions planned to develop institutional structure

N/A

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

The City is committed to the close coordination of all its programs with other City departments, local nonprofits and private sector. The Community Planning & Housing Division Staff will continue to participate in events and planning sessions of the local housing authority, private housing developers and health and social service agencies.

Staff makes every effort to attend various community meetings throughout Polk County. In a survey performed by Lakeland Vision, it outlined several priorities for the local community such as: effective land planning to provide diverse housing options for all incomes, preservation of green space and trees, reducing Lakeland's homeless population through outreach shelters and housing programs that provide comprehensive support services, including child care, education and job placement.

The City has an ongoing relationship with the Lakeland Housing Authority (LHA). The City also supports the LHA Youth Build project.

The City provides several health and social service agencies with CDBG and City general funds through the

public/community service application process.

Discussion:

The City will coordinate its efforts with other agencies and partners in the community to provide housing and services to the low-income households & assist those in the prevention of becoming homeless.

Program Specific Requirements

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

Introduction:

The City uses CDBG program funds to ensure decent affordable housing, to provide services to the most vulnerable in our communities, to create jobs through the expansion and retention of businesses and to support strong and healthy neighborhoods. Not less than 70 percent of CDBG funds are used for activities that benefit low and moderate income persons, and each funded activity meets one of the following national CDBG objectives:

- benefit low and moderate income persons,
- prevention or elimination of slums or blight, or
- address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available.

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	
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	2500.00
5. The amount of income from float-funded activities	0
Total Program Income:	**2500.00**

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:**

   For HOME funds, the City has no forms of investment other than those described in Section 92.205(b). HOME funds are invested as deferred payment loans.

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

   The City utilizes the recapture method for HOME programs as written in 24 CFR 92.254 {a} {4} with the period of affordability and Recapture Provisions of 24 CFR 92.254 {5}{ii}.

   Direct subsidies will be provided in the form of a deferred lien. If a homeowner elects to sale or use the property for non-eligible HOME Program activities, the amount of HOME fund assistance that the subrecipient or CHDO used to purchase and construct or rehabilitate and a homebuyer to purchase, shall be recaptured and repaid to the City provided the net proceeds are sufficient.

   In the event of a sale (voluntary or involuntarily) of the housing unit, and there are no net proceeds or the net proceeds are insufficient to repay the HOME investment due, the City shall recapture the net proceeds, if any. The net proceeds are the sale price minus superior loan repayment (other than HOME funds) and any closing costs.

   All CHDO's and subrecipients that are awarded HOME funding for the creation of affordable homebuyer units will use the recapture provisions. This language is included in the written contracts.

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:**

   Home Purchase Assistance – Assistance provided requires a recapture (affordability term) for all HOME funding. Down payment and closing cost assistance provided as a direct benefit to the client

for home purchase assistance shall be recaptured as follows:

Amount of HOME Assistance per Unit	Affordability Term
Under $15,000	5 years
$15,000 to $40,000	10 years
Over $40,000	15 years

The contractor's fee is provided as a grant to the client, not subject to recapture; but will be used to calculate the affordability period.

All homebuyers who receive HOME Program assistance will sign a deferred lien and HOME agreement that state the homebuyer will ensure the property remains their principal residence during the period of affordability, as determined by the funding amount. The City maintains a loan portfolio that is reviewed annually to determine if the home remains the borrower's primary residence.

Housing reconstruction - Construction – Recapture provisions

Housing Rehabilitation – Recapture provisions are applied to housing rehabilitation with the pro rata reduction of the deferred lien amount.

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:**

   The City does not intend to use HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds. The City's HOME funds may be used for single-family and multi-family units.

   Discussion:

For purposes of the City's housing programs, it elects to utilize for income eligibility requirement the Section 8-Part 5 program definition for annual income to determine household income. This definition shall be used program wide.