



# Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

## Narrative Responses

### GENERAL

#### **Executive Summary**

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 4 Action Plan Executive Summary:

In 2006, the Highlands County Consortium approved the 2006 – 2010 Consolidated Plan. The Consolidated Plan is a five-year road map that identifies housing, homeless, community and economic development needs and establishes a strategic plan for addressing these needs.

In accordance with 24 CFR Section 91.420, the Highlands County Housing Department has prepared this Action Plan that describes the resources that will be used and the activities that will be undertaken during fiscal year 2010 to implement the 2006 – 2010 Consolidated Plan.

A combination of Federal HOME, state SHIP, local and private sector grants, and other resources will be used to further implement this Fourth Year Action Plan.

The Highlands County Consortium does not receive Community Development Block Grant (CDBG), HOPWA, or Emergency Shelter Grants Program (ESG) funds, although non-profit agencies in the area may receive these funds directly from HUD or the State of Florida. All efforts are made to regularly coordinate with other agencies administering HUD and other housing related program funds to ensure efficient and effective use of all available funds.

The objectives and outcomes are detailed in the attached project funding charts. Other funding will be sought for leveraging through a wide range of programs provided by the Florida Housing Finance Corporation and through local strategies to reduce the cost of affordable housing.

The 2006 – 2010 Consolidated Plan began on October 1, 2006. To date, program performance, meeting unit delivery, has been marginal. Details on program

performance for the Fiscal 2008 and 2009 years will be detailed in the 3<sup>rd</sup> year CAPER that will be released no later than December 15, 2009.

### General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

The Highlands County Consortium covers of 6,367 square miles of land in the rural Heartland of Florida with 360 persons per square mile. It has grown from the 1990 Census total of 174,787 to 229,209 people by the year 2000. The 2000 Census reported that 50,191 residents were over 65 years old (22%), and 60,255 were under 18 (27%). More than 4,984 people over the age of five are disabled.

Over fourteen percent (14%) of the Heartland's population is "foreign born," and twenty-two percent (22%) are Hispanic. The greatest concentration of Hispanic households is in Hendry County followed by Hardee County, while for White and Other households the largest concentration was in Highlands and Okeechobee Counties.

Of the population over age 25, almost 15% (14.9%) have less than a 9<sup>th</sup> grade education, 18% have between a 9<sup>th</sup> and 12<sup>th</sup> grade education (no diploma), representing one third of that population. Eighteen percent of the workforce is employed in agriculture and mining, 17.7% in the service industry and 11% in retail.

Just over forty one (41.6%) percent of the workforce are females whose mean income is between \$18,823 and \$20,725. The mean income for males in the region is \$22,572 to \$29,196. The 2000 Census reflects the vast difference in population living in poverty in the region's six rural counties. In 2000, the state had 11.7% of the population was living in poverty. This Consortium's six counties currently have 19% of the total population living in poverty. The 2000 median family income was \$34,526 for the region.

#### Special Community Designations

##### State Enterprise Zones (Section 290.0065, Florida Statutes)

Florida's Enterprise Zone program was created to provide tax incentives and benefits to businesses locating in economically-distressed areas and to encourage the provision of employment for residents of such areas. All six of the Consortium Counties have a designated Enterprise Zones located within their jurisdiction. (Governor's Office on Tourism and Economic Development)

##### Federal Empowerment Zones, Enterprise Communities, and Champion Communities

The federal Empowerment Zone and Enterprise Community (EZEC) legislation enacted in 1993 resulted in the federal designation of more than 100 Empowerment Zones and Enterprise Communities in 42 states, including Florida. The federal legislation initially authorized more than \$2 billion in tax incentives and \$1 billion in social services block grants to assist in the revitalization and development of these communities. The EZEC program was designed to encourage a collaborative and comprehensive approach to addressing economic needs of communities. Florida has two federal Empowerment Zones: Miami-Dade County and the City of Jacksonville.

Champion Communities are cities and counties which applied for the Empowerment Zone designation, were unsuccessful in obtaining it, and were designated Champion Communities. Currently, Florida has four federal Enterprise Communities: Tampa; Jackson County; Immokalee, and Hendry County.

Champion Communities within the Consortium include: Hardee County, Highlands County, Glades Community, and Desoto County.

Areas of Critical State Concern

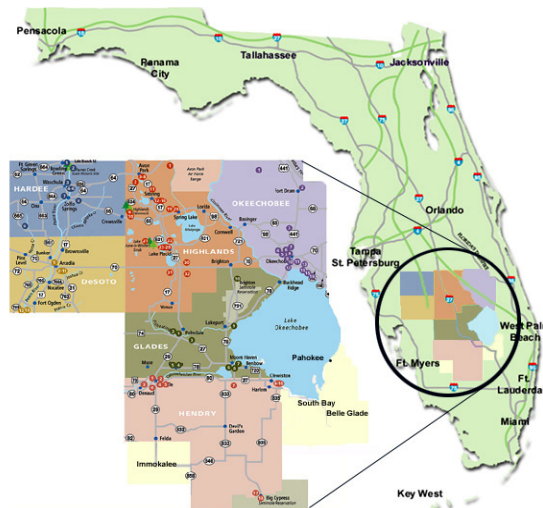
The Division of Resource Planning and Management within the Department of Community Affairs administers the Areas of Critical State Concern Program authorized by Section 380.05, Florida Statutes, and Rule 9J-1, Florida Administrative Code. This program is responsible for protecting resources and public facilities of major statewide significance. The Division reviews all local development projects within the designated areas and may appeal to the Administration Commission any local development orders which are not consistent with state guidelines. The Division is also responsible for reviewing and approving amendments to comprehensive plans and land development regulations proposed by local governments within the designated areas.

Rural Areas of Critical Economic Concern

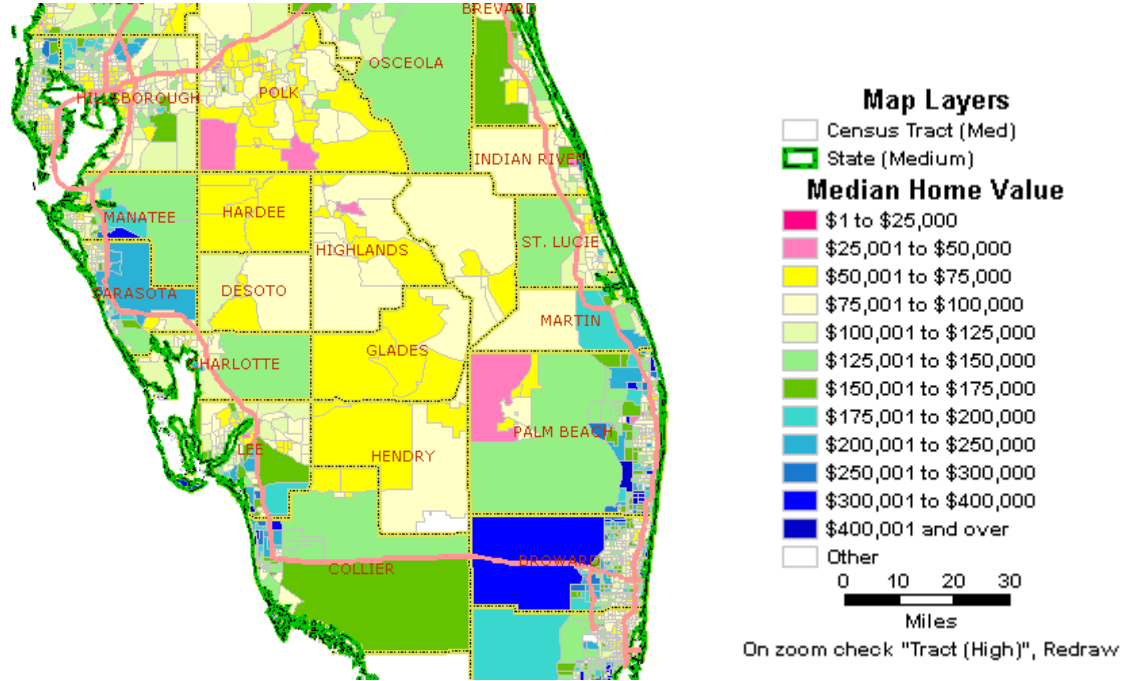
The Governor's Office of Trade, Tourism, and Economic Development (OTTED) has identified three rural areas of critical economic concern:

First Rural Area of Critical Economic Concern (counties of Washington, Holmes, Liberty, Calhoun, Gulf, Franklin, Gadsden, and Jackson.) Second Rural Area of Critical Economic Concern (counties of DeSoto, Glades, Hardee, Hendry, Highlands, and Okeechobee; area within the city limits of Pahokee, Belle Glade, and South Bay; and the area around Immokalee included in the round two Federal Rural Enterprise Community designation.) Third Rural Area of Critical Economic Concern (counties of Baker, Bradford, Columbia, Dixie, Gilchrist, Hamilton, Jefferson, Lafayette, Levy, Madison, Putnam, Suwannee, Taylor and Union).

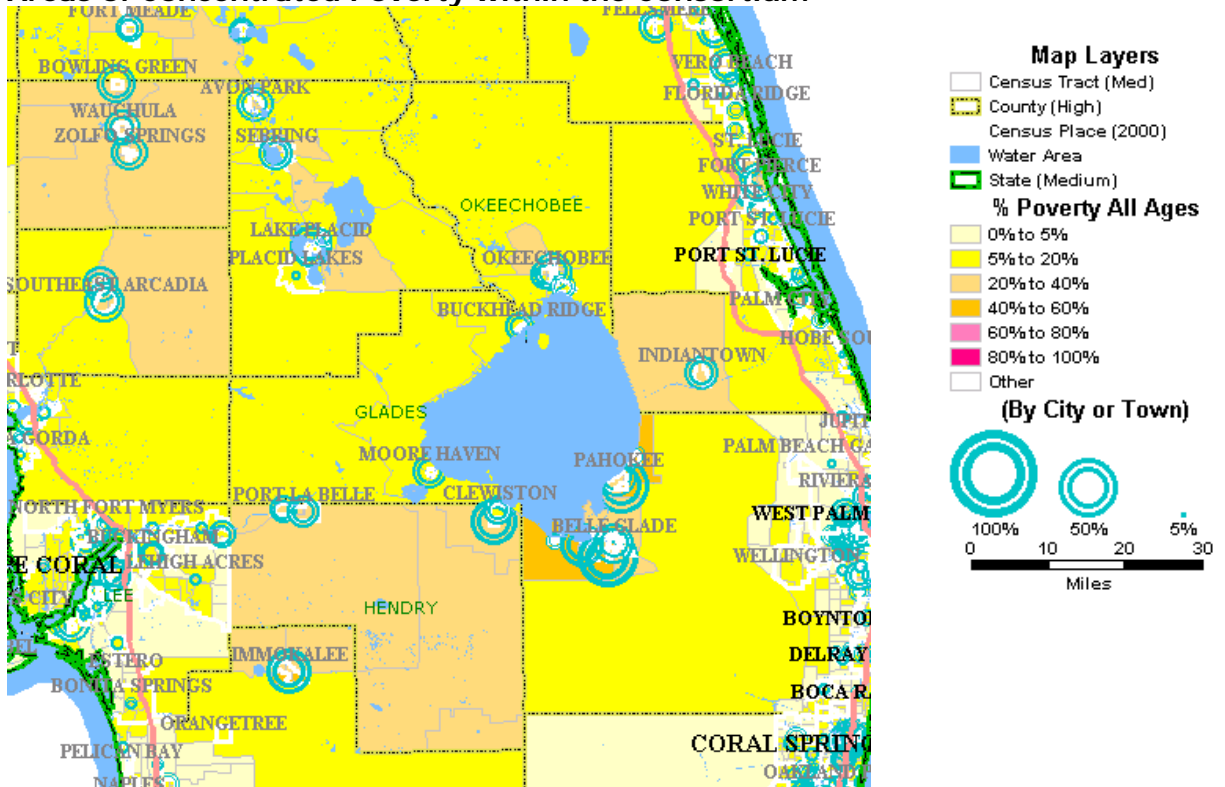
During 20010, the housing programs funded with HOME, and SHIP will be distributed throughout the six-county Heartland region (DeSoto, Glades, Hardee, Hendry, Highlands and Okeechobee Counties) on a first come, first served basis to eligible households outside the city limits of any incorporated municipality in these six counties.



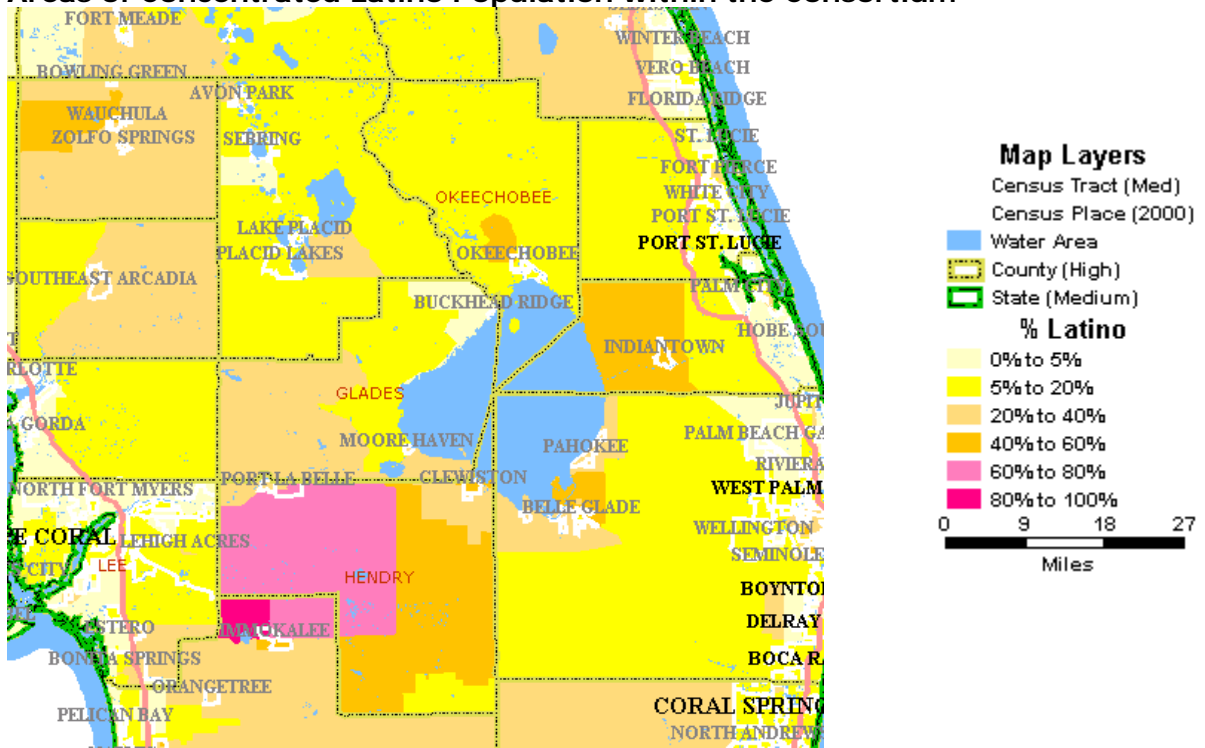
### Median Home Value within the Consortium



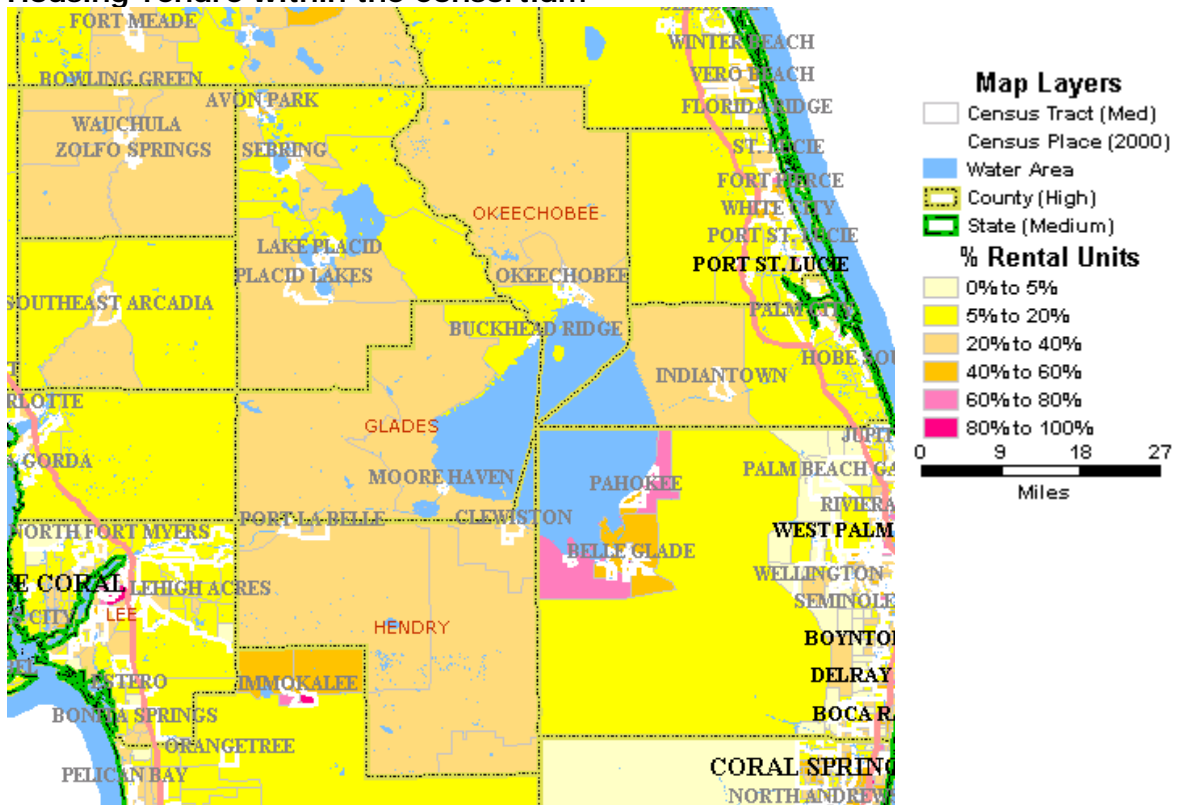
### Areas of Concentrated Poverty within the Consortium



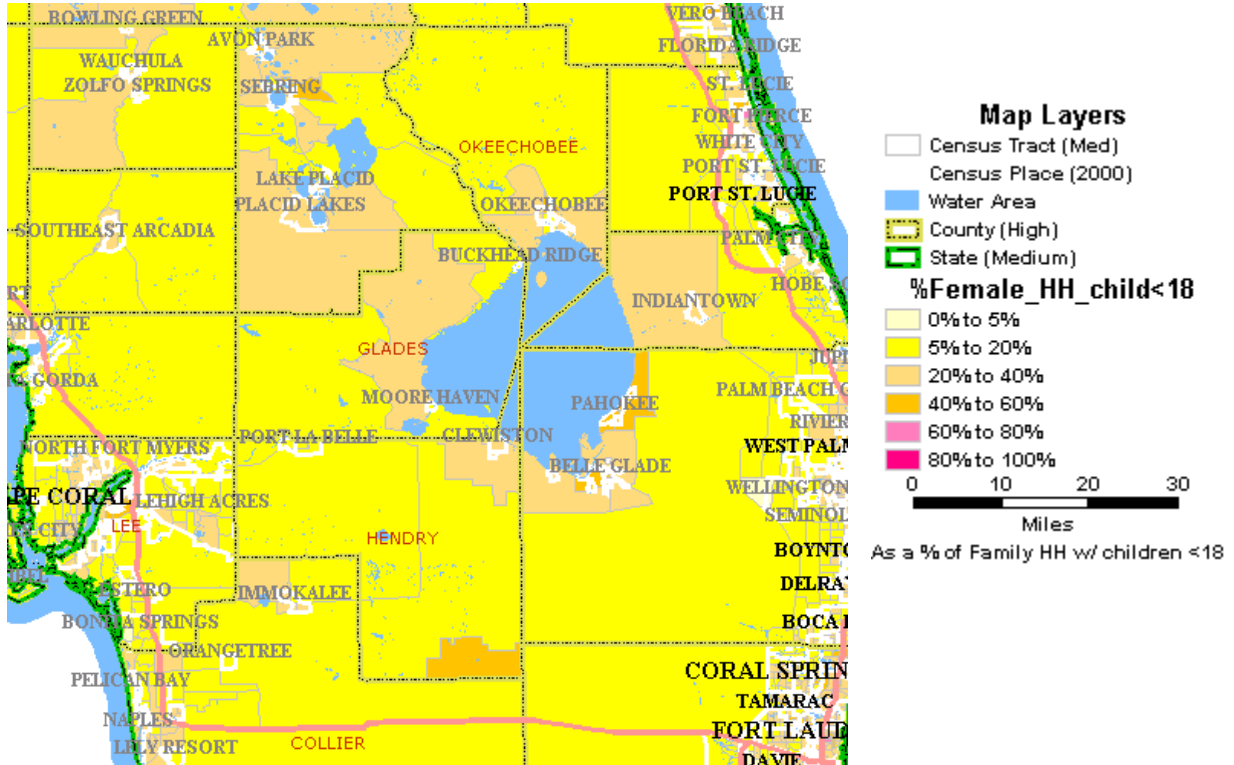
### Areas of Concentrated Latino Population within the Consortium



### Housing Tenure within the Consortium



**Female Head of Household with Children under 18**



- Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

The data shows the need for affordable ownership opportunities is Consortium-wide, with the need concentrated among lower income households and minority populations which are distributed Consortium-wide; therefore, the Consortium will not be designating any target areas.

- Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The Consortium, its members, service providers, and other partners will continue to seek funding sources and ways to improve service delivery.

- Mortgage buy-down and down payment and closing cost assistance will continue to be offered during 2009-2010.
- The expansion of land available for affordable housing will be accomplished first via Affordable Housing Land Inventory, a result of 2006 legislation (HB 1363), that requires all local governments in Florida to have available an inventory of publicly owned lands which can be used to determine property that is available and suitable for the development of affordable housing.

These inventories will become part of the local housing strategies to reduce the cost of housing.

- Continuum counties will continue emphasis on economic development competing for Small Cities CDBG grants, partnering with local Economic Development Commissions and the six county REDI, Florida's Heartland Rural Economic Development Initiative.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Resources expected to be made available, including program income:

HOME Investment Partnership Allocation: \$670,986.00

State Housing Initiatives Partnership (SHIP) Program: \$2,100,000

The funding resources included in this Action Plan are the HOME Investment Partnership Program (HOME), and State Housing Initiatives Partnership Program (SHIP) funds.

Program Year 4 Action Plan General Questions response:

### **Managing the Process**

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

Highlands County BCC is the lead agency responsible for administering programs covered by the Consolidated Plan. These programs are administered in the Highlands County Housing Department located at 501 South Commerce Ave., Sebring, Florida 33870. Staff can be reached at 863/402-6917. The staff contact person is Teresa Hofer, Housing Coordination Specialist.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

The Consortium as a whole has agreed to equally divide the funds between each county, with the understanding that if the funds for that county have not been encumbered by June 30<sup>th</sup> of each year, the funds may be spent in the other counties.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The Consortium will address the needs of the underserved in each county.

Program Year 4 Action Plan Managing the Process response:

## **Citizen Participation**

1. Provide a summary of the citizen participation process.

The Core Working Group representatives received local input from individuals and groups identified in the Consolidated Plan and in the Citizen Participation Appendix.

Copies of the draft Action Plan was sent by email to the Core Working Group member in each county.

Notices were advertised in regional and local newspapers (Hendry-Glades Sunday News, Herald Advocate Publishing Company (Hardee County), News Sun, (Highlands County) Okeechobee News, and Sun-Herald DeSoto-Arcadian News) to provide public notice of public hearings.

In this manner the Consortium reached state agencies, local governments, developers, and service providers of for-profit and nonprofit organizations.

The Fourth Program Year Action Plan was made available for inspection at the six County Housing Offices. In addition, it can be downloaded from the Internet at <http://www.hbcc.net/>. Persons who do not have access to the Internet could obtain copies from the Highlands County Board of County Commissioners Housing Department, 501 South Commerce Avenue, Sebring, Florida 32870.

The intention of this Fourth Year Action Plan is to implement the priorities contained in the Consolidated Plan. The draft plan was reviewed at two public hearings, held during the public comment period to insure that this Action Plan meets this intent. (See supporting documentation in the appendices for copies of hearing notices.)

2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

The Highlands County Consortium seeks to create coordinated programs that will result in stable, integrated, and mixed income communities and increase economic opportunities and improve living standards. The Highlands County Consortium will continue to accomplish these initiatives via the coordination of many different programs, stakeholders, and partnerships. The Consortium's six housing departments and the CoC network (which includes housing, health care, and employment providers) partner to address these three most pressing needs in the region and to fill gaps in services.

In addition, to the COC's coordinated activities, each of the six counties has a coalition of service providers that meet monthly or quarterly to coordinate resources and to develop strategies to meet the gaps in services.

As a participant in these coalitions, the Consortium members will continue homeownership outreach through the service provider organizations, providing informational flyers, group presentations, homebuyer and money skills trainings, and one on one homebuyer/credit counseling.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 4 Action Plan Citizen Participation response:

## **Institutional Structure**

1. Describe actions that will take place during the next year to develop institutional structure.

During 2009-2010, the Consortia will continue a concerted outreach program to find potential partners, provide technical assistance, and certify not-for-profit housing providers as Community Housing Development Organizations (CHDOs). The Consortia has set aside 15% of the total allocation to provide to a CHDO for the development of one homeownership unit.

Program Year 4 Action Plan Institutional Structure response:

The Consortia will step up implementation of the homebuyer buy down program by working closely with the six housing departments throughout the six county areas.

## **Monitoring**

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 4 Action Plan Monitoring response:

The Highlands County HOME Consortium through the Lead Agency will monitor its performance through the Consolidated Annual Performance and Evaluation Report (CAPER). We will review and report the progress it has made in carrying out its Strategic Plan and Annual Action Plan.

Throughout the program year, the County will utilize the Integrated Disbursement and Information System (IDIS) for setting up, funding, drawing down funds and reporting funds as required. IDIS reports will be incorporated into the CAPER and made available to the public as required.

In addition to the HUD monitoring and reporting requirements during the program year, the County will undertake the following monitoring program for its housing project.

- The County will conduct a monitoring of its agreement to determine compliance with the agreements and ensure the affordability requirements are being met as outlined in the agreement.
- The County will monitor the deferred loans provided in conjunction with the County's First-Time Home Buyer Program to determine the recipients and properties remain eligible for the life of the affordability period.
- The County will monitor sub-recipients to ensure compliance with federal and local requirements outlined in the agreement. The monitoring will include site visits and a review of files.

## Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Lead-based paint hazard reduction will be integrated into all housing policies and programs in the six-county Consortium. The Highlands County Consortium will take a number of measures to evaluate and reduce lead-based paint hazards:

- In partnership with the two public housing authorities (City of Avon Park and City of Arcadia), individuals qualifying for rental assistance through the Section 8 program will receive a HUD pamphlet titled: *Protect Your Family from Lead in Your Home*;
- Owners of Section 8 rental properties constructed prior to 1978 that receive Federal assistance through the local housing authorities will receive a HUD pamphlet titled: *Protect Your Family from Lead in Your Home*; and all Section 8 units and sites must be in compliance with the new HUD lead-based paint regulations;
- Individuals taking part in the Down Payment Assistance Program receive a copy of *Protect Your Family from Lead in Your Home*;
- Although the Consortium will not be rehabilitating rental units with HOME funds in 2009-2010, any units rehabilitated using these or any other Federal funds will be required to abide by new HUD lead-based paint regulations.

The Consortium supports the housing authorities and other agencies in efforts to educate and inform the public of the hazards associated with lead-based paint.

Program Year 4 Action Plan Lead-based Paint response:

The Consortium will continue to educate all clients on the dangers of lead base paint.

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## HOUSING

### Specific Housing Objectives

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

Priority 1: Home Ownership for Low to Moderate Income Families

Objective 1: Improve access to affordable owner housing

*Outcome 1: Increase the supply of affordable housing for purchase by lower income households to improve access to affordable owner housing.*

Specific Annual Objective 1: Construct one new unit of affordable owner-occupied housing through a CHDO to improve access to affordable owner occupied housing.

*Outcome 2: Increase the number of lower income households that are able to afford to purchase a home.*

Specific Annual Objective 2: Assist 20 low income households to purchase homes with mortgage buy down and/or down payment assistance to improve access to affordable owner housing.

*Outcome 3: Increase the number of lower income households able to afford home purchase through home ownership training.*

Specific Annual Objective 3: Assist 300 low income households to purchase homes through home buyer education on financial requirements and money management

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2010 Annual Objective 1: Construct 1 new unit of affordable owner occupied housing for one family at or below 80% of the median income through a CHDO over the one-year period.

#### Resources

HOME Investment Partnership \$100,647.90

2010 Annual Objective 2: Assist 18 low income households to purchase homes with mortgage buy down and/or down payment assistance (up to \$25,000 each) in a one year period.

**Resources**

HOME Investment Partnership \$503,239.50

2010 Annual Objective 3: Provide pre-purchase counseling to 300 households.

**Resources**

State Housing Initiatives Partnership \$167,746.50

\*The 25% required match of \$167,747 is covered under the combined State Housing Initiatives Partnership Program (SHIP) housing activities which are administered in all six counties.

The SHIP Program meets all the affordable housing match requirements of the HOME Program because 30% of all SHIP funds must be expended for persons at or below 80% of the MFI, while an additional 30% must be expended for persons at or below 50% of the MFI.

Administration: \$67,098.60

In addition to the SHIP funding (a minimum of \$350,000 to each County) Highlands County Consortium Counties are active partners in the development of affordable housing. The housing coordinators are involved with a broad spectrum of not-for-profit and for-profit developers who apply directly to the Florida Housing Finance Corporation for rental and home ownership projects targeted to low and moderate income families. The State also requires extensive planning and review of projects to ensure that affordable housing needs are a high priority. House Bill 1375, passed by the Florida legislature in 2007, adds additional coordination to the planning and affordable housing policy review process to ensure that affordable housing is considered at every step of the planning process.

Program Year 4 Action Plan Specific Objectives response:

The Consortia will continue to provide qualified applicants with down payment assistance to make the home affordable.

**Needs of Public Housing**

Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

The Consortium has no funds to directly allocate to the two Public Housing Authorities (PHAs) within its jurisdiction. However, the Consortia will conduct outreach clinics to the PHAs to alert residents of the homeownership opportunities and programs available to them.

If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 4 Action Plan Public Housing Strategy response:

N/A

## Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

As discussed in the Consolidated Plan, the three major ways that regulations can affect housing are 1) regulations that restrict building potential; 2) impact fees which adds direct costs to housing unit construction; and 3) costly and lengthy review processes.

The following actions will take place to address some of these barriers to affordable housing:

- House Bill 1375 passed by the 2007 Florida Legislature and attached to SHIP funding, mandate the requirement of an Affordable Housing Advisory Committee to be cooperatively staffed by the housing and planning departments as of June 2008. House Bill 1375 specifies how the AHAC must be structured meaning representatives from specific areas are required. This new House Bill also places very serious work tasks and requirements on the AHAC. Committee members are now required to review local policies and procedures, ordinances, land development regulations and the comprehensive plan. They must submit specific recommendations for actions and initiatives to encourage or facilitate affordable housing. The Committee must submit a report every three years that includes recommendations and evaluation on the implementation of, affordable housing incentives in eleven specific areas. This activity has been initiated in all six member counties. The implementation of this committee will result in an increased level of awareness and consideration of how local policies and/or ordinances impact affordable housing through submission of a tri-annual report.
- Impact Fees: To date all six counties have passed impact fees. In large part, these decisions have been made because the local government cannot meet its long term capitol investment demands with the current funding stream. The Highlands County Impact Fee Ordinance contains language that will waive Impact Fees for persons whose income is at or below 80% of the MFI. Further, the Ordinance establishes an Affordable Housing/Workforce Housing Trust fund of *Ad Valorem* funds. This Trust Fund will pay Impact Fees for persons whose income is between 80% and 140% of the MFI. In May 2007, the DeSoto County Board of County Commissioners voted to reduce their Impact Fee Scale by over one-third, reversing a trend which had increased the cost of development and delayed some rental and owner development in the affordable range, furthermore, the DeSoto County Board of County Commissioners suspended impact fees for a period of six months effective Dec. 2007. Hendry County has also suspended impact fees for a one year period effective through January 2009. All other counties have adopted impact fees and provide for exemptions for replacement housing through

County administered program. Hardee County has not yet adopted impact fees. Adoption was deferred in attempt to provide economic stimulus.

Expedited permitting for affordable housing is also the law in Florida as it applies to all affordable housing projects. Local policies, such as the Highlands County example below, outline these requirements in the Local Housing Assistance Plan:

“When requested by an applicant for an affordable housing project, as defined by *Chapter 420, Part VII, Florida Statutes*, and the application is determined to be complete along with the required fee, the County shall grant first priority in plan review and processing to expedite the issuance of a preliminary and a final development order and all applicable development permits. To effect the successful issuance of a development order and/or permit, the County shall continually monitor the progress of the application. The project, however, shall comply with all requirements of these regulations unless otherwise exempt”.

Other actions to reduce barriers to affordable housing will include:

- Highlands County has established an Affordable Housing Land Bank. These properties are County owned land that the BCC has declared surplus and designated as land that can be developed for affordable housing or sold and the funds placed in the local Housing Trust fund for the development of affordable housing.
- Highlands County intends to review each property that has been foreclosed on due to unpaid Code Enforcement fines and, where feasible, process parcels to be set aside for infill affordable housing.
- Density Bonus Program: Rather than Inclusionary zoning, the Highlands County Consortium seeks to incentivize the development of affordable housing.
- Affordable and Workforce Housing Trust Fund: Highlands County BCC has established an Affordable and Workforce Housing Trust Fund to be funded by a transfer to the Trust Fund from The County General Fund. The Trust fund is established to provide for the creation of Affordable and Workforce Housing within the County.

Program Year 4 Action Plan Barriers to Affordable Housing response:

The Consortia will continue working on the three major ways that regulations affect housing in our six counties.

## **HOME/ American Dream Down payment Initiative (ADDI)**

1. Describe other forms of investment not described in § 92.205(b).

No other form of investment other than that described in Section 92.205(b) is planned.

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

In the event the Borrower sells his or her interest in all or any part of the Property, or in the event of a foreclosure, the Lender may only seek repayment based on the availability of net proceeds, which shall be the amount remaining once the aforementioned First Mortgage and any appropriate closing costs have been satisfied.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
  - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
  - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
  - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
  - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
  - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
  - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

N/A

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
  - a. Describe the planned use of the ADDI funds.

One home which meets both ADDI and HOME requirements will be eligible the ADDI subsidy as a portion of their \$25,000 HOME down payment. The same guidelines covered in number 2 above will be used for this loan.

- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.

The Consortium will notify residents of manufactured housing of the availability of ADDI funding via the six-county Housing Departments. Each County will be expected to post flyers in their waiting areas, at all (rental) manufactured home parks and the two public housing waiting areas. The Cities of Avon Park and Arcadia Housing Authorities will be

asked to distribute the flyers to their clients when they are recertified each year.

ADDI funds will be intermingled with both federal HOME and SHIP monies for the Down Payment Assistance Program. Participating individuals must be low-income first-time homebuyers that qualify under both the HOME program and ADDI guidelines.

- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

All families receiving HOME and/or ADDI funding will be required to undergo homebuyer education and counseling as a precursor to receiving a second mortgage loan. All homebuyers processed through the homeownership programs are required to attend homebuyer training and submit documentation of completion of the course.

Program Year 4 Action Plan HOME/ADDI response:

The Consortia will continue to provide qualified applicants with HOME/ADDI assistance to make the home affordable.

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## HOMELESS

### Specific Homeless Prevention Elements

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

The Highlands County Consortium does not receive any funds to address homeless needs per se. However, Florida's Heartland Rural Consortia for the Homeless, Inc. (FHFCH), the six-county Continuum of Care, submitted its Year 2 Continuum of Care Plan to HUD on June 14, 2009.

The funding sources such as state Challenge Grant, Grant-In-Aid, and Staffing Grant, along with McKinney-Vento (SHP) funds will be granted to FHRCH, the CoC. All details of CoC activities are covered in that Plan.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

Although no funds are available to address homelessness, the members of the Continuum will continue to support the efforts of the CoC and provide assistance from other sources, be it in the form of reduced or waived impact fees, expedited permitting, or revenue.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

Although no funds are available to address homelessness, the members of the Continuum will continue to support the efforts of the CoC and provide assistance from other sources, be it in the form of reduced or waived impact fees, expedited permitting, or revenue.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

The Continuum members will continue to apply for homeless prevention funds and support the efforts of other service providers seeking such funding. Many of the Housing Departments in the six-county region also use SHIP funds for Homeless/Foreclosure Intervention on an on-going basis and will continue this activity during FY 2009-2010.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

The CoC convened a task force in conjunction with the Local Coalitions for the Homeless, housing providers, law enforcement, health care providers, and service providers to review current discharge policies of publicly funded entities in the area. As a result, local county jails and federal prisons have developed Memorandums of Understanding (MOUs) with the Homeless Consortium to ensure that discharged prisoners have housing alternatives to homelessness. The Homeless CoC also has MOUs identifying additional discharge strategies and agreements with health care providers and mental health care providers. The HOME Continuum members are full participants in the discharge planning and will continue this activity through 2009-2010.

Program Year 4 Action Plan Special Needs response:

The Lead Agency staff will continue to research “Best Practices” of other communities and recommend incorporating appropriate elements for inclusion in local homeless policies.

## Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

N/A

Program Year 4 Action Plan ESG response:

N/A

## COMMUNITY DEVELOPMENT

### Community Development

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services, and economic development.

N/A

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

N/A

\*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 4 Action Plan Community Development response:

N/A

### Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

N/A

Program Year 4 Action Plan Antipoverty Strategy response:

N/A

## NON-HOMELESS SPECIAL NEEDS HOUSING

### Non-homeless Special Needs (91.220 (c) and (e))

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

While insufficient HOME funding is available to directly address non-homeless special needs at this time, the Consortium's member counties will consider support for any multi-family rental projects with SHIP funding including support for special needs housing such as elderly and farmworker housing projects under development. These include State and Federal funding projects proposed for development through multiple funding sources provided through the Florida Housing Finance Corporation.

Hardee County: Country Walk will serve renters at or below 80% of the AMI with 64 affordable rental units, and Valencia Gardens will serve 104.

Highlands County: Sleepy Hollow will serve renters at or below 80% of the AMI with 122 affordable rental units. Construction should begin in January 2010.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Florida Housing Finance Corporation has lost all funding for the 2009-2010 budget for SAIL and PLP development.

Program Year 4 Action Plan Specific Objectives response:

All counties in the consortia will assist with the needed affordable rental units that are desperately needed in our counties.

### Housing Opportunities for People with AIDS

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

N/A

2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.

N/A

3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed

goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.

N/A

4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

N/A

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.

N/A

6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

N/A

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

N/A

8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

N/A

9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

N/A

Program Year 4 Action Plan HOPWA response:

N/A

## Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

N/A

Program Year 4 Specific HOPWA Objectives response:

N/A

## Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

The Highlands County Consortium, as a participating jurisdiction, certifies that, in accordance with Section 281 of the National Affordable Housing Act and 24 CFR Part 92.352, Department of Housing and Urban Development's Rules, prescribed procedures are acceptable to the Secretary and are established to oversee its affirmative marketing program.

The affirmative marketing steps shall consist of actions to provide information and otherwise attract eligible persons in the housing market area to the availability of housing without regard to race, color, national origin, sex, religion, familial status, or disability.

The Consortium will require an affirmative marketing policy in conjunction with the Consortium's commitment for HOME funds. The affirmative marketing policy shall consist of the following elements:

A. Informing the Public, Owners and Potential Tenants about Federal Fair Housing Laws: Recipients shall utilize acceptable methods for communicating affirmative marketing requirements which may include, but are not limited to, providing a copy of this policy to be used in all media releases, using the Equal Housing Opportunity logo and slogan in all media releases, and explaining the general policy to the media, property owners, and tenants involved with the HOME program.

B. Requirements and Practices Recipients Must Adhere to When Advertising Vacant Units: When advertising for a HOME property, recipients may use commercial media (newspaper or television) or local community contacts, but should utilize the Equal Housing Opportunity logo or slogan and always use caution when documenting affordable housing (income and rent restrictions).

C. Recipients' Outreach Requirements: Recipients shall solicit applications from persons in the housing market area who are not likely to apply. Persons not likely to apply are defined as those who are not the race/ethnicity of the residents of the neighborhood in which the unit is located. Examples of procedures to be adopted by all recipients may include, for example, selecting of community organizations, churches, employment centers, fair housing groups, public housing authorities, or housing counseling agencies that provide services to, or have as members or

persons in the group or groups least likely to apply to advertise the availability of housing.

D. Record Keeping and Corrective Action (If Necessary): Recipients shall be required to maintain records that describe efforts taken to affirmatively market units. The Consortium will review such records annually and if found unacceptable will provide the proper technical assistance to ensure appropriate affirmative marketing steps are being followed pursuant to 24 CFR 92.351. In addition, an agreement that shall be binding for specific period of time (during the affordability period of the units) shall be executed which will require compliance with 24 CFR 92.351.

#### Minority and Women Business Outreach

The Consortium will carry out activities and procedures in accordance with 24 CFR 92.350(b) under the Minority and Women's Business Enterprises (MBE/WBE) Outreach Program to further the objectives of Executive Orders 11625, 1232, and 12138.

Under the MBE/WBE Outreach Program, the Consortium will make efforts to encourage recipients defined as state recipients, sub-recipients, prime contractors and owners of HOME-assisted housing, to use minority and women-owned business enterprises that recipients may contact will include, but are not limited to the following: real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, and accountants. In addition, the state gives priority to outside environmental review and credit underwriting consultants who are associated with minority firms.