Community Development Block Grant Program
Emergency Solutions Grant and
HOME Investment Partnerships Program
2018 Annual Action Plan
Fiscal Year 2018

Montgomery County, Pennsylvania

October 1, 2018 through September 30, 2019

MONTGOMERY COUNTY DEPARTMENT OF HEALTH AND HUMAN SERVICES
PROGRAM OFFICE: HOUSING AND COMMUNITY DEVELOPMENT
Human Services Center
1430 DeKalb Street, 5th Floor
Norristown, PA 19404-0311
Emma W. Hertz, MPA, Administrator
Section One
1. THIRD PROGRAM YEAR - FY 2018 ACTION PLAN

A. ANNUAL ACTION PLAN
   AP-15 Expected Resources.................................................................131
   AP-20 Annual Goals and Objectives.......................................................134
   AP-35 Projects..................................................................................139
   AP – 38..........................................................................................141
   AP-50 Geographic Distribution..............................................................154
   AP-55 Affordable Housing.................................................................156
   AP-60 Public Housing.........................................................................158
   AP-65 Homelessness and Other Special Needs Activities.....................160
   AP-75 Barriers to Affordable Housing..................................................165
   AP-85 Other Actions.........................................................................167
   AP-90 Program Specific Requirements...............................................170

Section Two
2. Grantee Unique Appendices

Section Three
3. CITIZEN PARTICIPATION ATTACHMENTS

   A – 2018 Citizen Participation Schedule
   B - 2018 Application
   C –Public Notice and Sign-In Sheets

Section Four
4. GRANTEE SF 424 AND CERTIFICATIONS ATTACHMENTS

   A. SUBMISSION FORMS
      Form SF 424
      Certifications
      Specific CDBG Certifications
      Appendix to Certifications
Section One

1. FOUR PROGRAM YEAR
   FY 2018 ACTION PLAN
Executive Summary

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

1. Introduction

Montgomery County has prepared the Year 4 Action Plan as required under 24 CFR 91.220, the fourth of five such plans to be prepared as part of the County’s Five-Year Consolidated Plan process. The Montgomery County Five-Year Consolidated Plan covers the period FY 2015 to FY2019, (October 1, 2015 – September 30, 2019). The Action Plan for FY 2018 identifies the activities to be funded with Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) program funds received during the program year. Additionally, the Plan accounts for the County’s Affordable Housing Trust Fund (AHTF), administered by the Department of Housing and Community Development to advance goals consistent with those of the federal entitlement grant programs.

This plan was completed after soliciting comments from representatives of participating municipalities, citizens and social service agencies regarding community needs. While the purpose of the Consolidated Plan is to identify housing and community development needs, the purpose of the Action Plan is to develop specific goals and objectives to address those needs for the coming fiscal year. The Consolidated Plan and this Annual Action Plan allow the County to continue to receive federal housing and community development funds and must be submitted to the U.S. Department of Housing and Urban Development (HUD) by August 15, 2018.

In developing the Year 4 Consolidated Plan during the spring and summer of 2018, Montgomery County examined the priorities it had listed in its prior Five-Year Plan, including priority needs for housing, public facilities, infrastructure, public services and issues related to homelessness and special needs populations and established the following goals and objectives:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs and transitioning homeless persons and families into housing;
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate income residents throughout the County, increased housing opportunities and reinvestment in deteriorating neighborhoods; and
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability and the empowerment of low and moderate income persons to achieve self-sufficiency.
In addition to the Federal Funds, the County of Montgomery’s Department of Housing and Community Development administers funds through the County’s Affordable Housing Trust fund. The Pennsylvania Optional County Affordable Housing Funds Act of 1992 allows for an alternative method for county governments to raise revenues for affordable housing efforts. Using the Act, Montgomery County established an Affordable Housing Trust Fund. Each year Montgomery County allocates approximately two million dollars in trust fund dollars for affordable housing projects. A list of projects funded in 2018 is included in the Grantee Unique Appendices.

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.

Montgomery County is committed to allocating funds that serve the needs of the lowest income and most disadvantaged residents. Households with incomes less than 60% of the area median income, particularly those with extremely low incomes (less than 30% of area median income) are particular priorities. The County has also identified special needs individuals as among those who face the greatest challenges and who should receive high priority in the expenditure of federal funds, including at-risk children and youth, low income families, the homeless and persons threatened with homelessness, the elderly and persons with disabilities. The following needs, as they relate to the Plan's Goals, address this priority:

Goal: Provide Decent Housing - Need: 1) Through an Affordable Housing Strategy; 2) Investment in community development activities in lower income and deteriorating neighborhoods and in facilities that serve lower income populations; and 3) Supportive services to maintain independence.

By focusing on these needs, Montgomery County seeks to address community concerns as:

A need for additional affordable housing to address the growing gap between housing costs and local incomes, which leads to rising rates of overcrowding and overpayment for the County's lowest income residents;

Programs that improve community facilities and services, particularly in low income areas;

A network of shelter, housing and support services to prevent homelessness, move the homeless to permanent housing and independence and eliminate chronic homelessness;

Programs that promote economic development, create jobs and increase the job skills level of potential employees; and
Supportive services that increase the ability of seniors, persons with disabilities and others with special needs to live independently and avoid institutions.

3. Evaluation of past performance

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

Montgomery county prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY2016 (October 1, 2016 to September 30, 2017). This CAPER was the first of the prior five-year period and reported the FY2016 accomplishments of Montgomery County’s CDBG, HOME and ESG Programs.

During FY2016, Montgomery County expended $2,819,459.07 in CDBG funds, $1,469,491 in HOME Funds, and $267,286 in ESG funds. In FY2016, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. The County met the timeliness goal set by HUD for FY2016. The county anticipates similar expenditures in FY2017.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

In accordance with 24 CFR 91.115(e), Montgomery County has adopted a Citizen Participation Plan describing the citizen participation requirements of its federal programs. The Citizen Participation Plan is on file at the Department of Housing and Community Development.

The County conducted public meetings to solicit input into the preparation of the FY 2018 Action Plan. The meetings were advertised in several regional newspapers and notices were sent to social service agencies and municipalities. The newspapers that the County advertises in are:

- Intelligencer, Doylestown
- The Mercury, Pottstown
- The Reporter, Lansdale
- The Times Herald, Norristown
- Al Dia - Spanish Newspaper

Public hearings were held at three locations to provide citizens and organizations the opportunity to participate:

March 6, 2018,

6:00 pm Room SH221
The Montgomery County Action Plan is a product of a planning and coordination process required by the U.S. Department of Housing and Urban Development to prioritize the spending of Federal funding allocated to the County of Montgomery over the coming year. The Plan presents how Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME) funds will be allocated to address the needs and priorities identified in the annual plan. The County's Plan has been developed so that it is consistent with and meets the three overarching goals of creating 1) a viable sustainable urban community by providing decent housing, 2) a suitable living environment and 3) expanded economic opportunities all principally targeting low and moderate-income persons and programs that will address the needs of homeless and near homeless persons.
The County's Citizen Participation outreach was designed to encourage a broad participation from the County's residents, including non-English speaking persons. An approved Citizen Participation Plan was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public and data provided by HUD was used to identify the goals and activities of this Action Plan.
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.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Program Office: Housing and Community Development</td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Program Office: Housing and Community Development</td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>MONTGOMERY COUNTY</td>
<td>Program Office: Housing and Community Development</td>
</tr>
</tbody>
</table>

*Table 1 – Responsible Agencies*

**Narrative (optional)**

The lead agency for the Action Plan is the Montgomery County Department of Health and Human Services, the Housing and Community Development office, which oversees the administration of all CDBG, HOME and ESG entitlement programs in addition to the County Affordable Housing Trust Fund.

In addition, the Montgomery County Housing Authority (MCHA) will play a large role in providing and managing housing programs covered by this plan. Projects are also coordinated with various non-profit organizations, the Montgomery County Redevelopment Authority, the Community Action Development Commission (CADCOM), Your Way Home Montgomery County and the Montgomery County Opportunities Industrialization Center.

**Consolidated Plan Public Contact Information**

Emma W. Hertz, MPA
Administrator
Program Office of Housing and Community Development

Montgomery County Department of Health and Human Services

PO Box 311

Norristown, PA 19404-0311

610-278-3540

ehertz@montcopa.org

www.montcopa.org
AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The County of Montgomery has prepared its Annual Action Plan for 2018 in order to strategically implement federal programs that fund housing, community development and economic development activities within the County. Through a collaborative planning process that involved a broad range of public and private agencies, the County developed an application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME). The County will submit this Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD) by August 15, 2018.

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 Department of Housing and Community Development (DHCD) is responsible for the coordination of various activities required in the administration of grant programs under its purview. To ensure that service delivery coordination is continued, it is essential that each agency share data, exchange information and consult and coordinate with each of the other service providers. The County’s primary means of connecting and networking with housing and service providers in the region is as follows:

- The County’s health and human service offices have been restructured under a single Department of Health and Human Services (HHS) in order to unify the work done by the program offices. The new HHS has added additional offices for Strategic Support, including offices of Integrative Services, Performance and Planning, Finance and Administration, and Community Information and Education. These offices are working towards coordinating the back end and integrated functions of all HHS offices and services, and to streamline and coordinate the services provided to residents in need of housing as well as health, mental health, and other services.

- The County utilizes Community Connections, an innovative approach to provide social services to residents in four regions of the County. The Navicates services are the first of a series of Community Connections initiatives that have changed the way in which Montgomery County serves our communities as it relates to human services, building a stronger partnership between government and community organizations.

- Montgomery County Department of Behavioral Health and Developmental Disabilities (BH/DD) provides funding for the development of permanent housing opportunities for individuals who experience mental illness and are of low income. This project is administered jointly with the Montgomery County Department of Housing and Community Development. Projects will be
considered if they add to the affordable housing stock for persons who experience mental illness.

This Department has an array of supportive services that work with individuals to support their health and wellness as they become more active members of the communities in which they work and live. The Department will provide technical assistance and create liaisons between the housing developers and local supportive service providers.

In 2014, the Department of Housing and Community Development (DHCD) established a new program, Your Way Home (YWH) Montgomery County, funded with Affordable Housing Trust funds. Your Way Home Montgomery County is a new and more effective system for preventing and ending Homelessness. Montgomery County residents experiencing a housing crisis will simply contact the YWH call center, a toll-free hotline for screening and referral to three newly formed community-based Housing Resource Centers (HRC). HRCs serve as central locations for coordinated housing crisis response for families and individuals in each major region of Montgomery county, connecting residents with needed resources, support and community connections to secure permanent housing and remain stably housed.

HRCs use a progressive engagement strategy, a nationally recognized best practice in addressing homelessness, to provide customized levels of assistance to families and to reserve the most expensive interventions for residents with the most severe barriers to housing success.

**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 Office of Housing and Community Development (OHCD) is the Continuum of Care (CoC) Collaborative Applicant and CoC Lead Agency for the Montgomery County Continuum of Care—designated as PA-504: Lower Merion/Abington/Norristown/Montgomery County CoC.

The CoC runs under the auspices of Your Way Home (YWH) Montgomery County, a public-private partnership established in 2014 as the CoC’s unified and coordinated housing crisis response system for families and individuals experiencing homelessness or at imminent risk of homelessness. Through Your Way Home, the CoC embraces a “housing first” approach to ending homelessness by first helping people find or maintain permanent housing with stability and then connecting them with the community resources they need to prevent future experiences of homelessness. Through coordinated entry and assessment, YWH prioritizes housing and services based on vulnerability and need rather than on a first come, first serve basis. Through progressive engagement, consumers are given just as much services and support they need to succeed and in order to preserve costly interventions like permanent supportive or subsidized housing for families and individuals with significant and lasting barriers to housing stability.
The major components of accessing services for all persons experiencing homelessness within the CoC jurisdiction are as follows:

- Coordinated entry and assessment through the Your Way Home Call Center and Street Outreach Team utilizing the Service Prioritization and Decision Assistance Tool (SPDAT).
- A CoC wide Community Queue to prioritize households for housing and services based on vulnerability and severity of need. Through the community queue, chronic homeless individuals and families, as well as those experiencing street homelessness, are prioritized for services.
- Housing-Focused Emergency Shelter services, including centralized shelter bed management.
- Housing Counseling services to divert people from entering shelter or becoming street homelessness. Housing counseling services target families and individuals doubled-up and at imminent risk of homelessness.
- Three Housing Resource Centers staffed by Housing Stability Coaches and Housing Locators to rapidly re-house people who are literally homeless.
- Transitional Housing for select populations, including transitional age youth, persons fleeing domestic abuse, veterans, and people in the early stages of substance abuse recovery, among others.
- Permanent Supportive Housing for people with significant barriers to permanent housing stability.
- Connections to mainstream and community services, including child care, food security, physical, mental and behavioral health, employment and job training, public benefits access and veterans’ services, among others.

The CoC works closely with staff at OHCD and the larger YWH Public-Private Partnership. It is led by a 17-member CoC Governance Team, comprised of both public sector, non-profit and private sectors members. There are 2 Co-Chairs, one from the public sector and the other from the non-profit sector. The CoC Governance Team meets every other month to coordinate homeless services within the jurisdiction, assess service gaps and to work on the CoC Annual Competitive Application when it is announced by HUD. Further, the CoC Co-Chairs provide monthly updates to the larger CoC membership through monthly community update meetings. All interested residents, including homeless organizations in Montgomery County are encouraged to join and participate in the CoC through various Action Teams and events held throughout the year. The YWH website is updated regularly with information on all CoC events and activities.

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 Office of Housing and Community Development (OHCD) is both the CoC and HMIS Lead Agency and is also the participating jurisdiction for ESG federal entitlement funds in Montgomery County. Additionally, OHCD regularly applies for additional ESG funds from the Pennsylvania Department of Community and Economic Development (DCED). Written standards, as well as performance standards for all ESG funds are outlined in the YWH Operations Manual and are targeted towards services for street outreach, shelter operations, Rapid Rehousing (RRH) and persons at imminent risk of homelessness. Like the CoC, services funded through ESG are coordinated through the YWH coordinated crisis response system with prioritization of services provided to those that are most vulnerable, experiencing literal homelessness and/or are chronically homeless. CoC consultation and monthly community update meetings are held throughout the year—with announcements for meetings dates and agendas publicized through the YWH website and Mailing List.

Access to ESG funds in Montgomery County is conducted through an annual competitive Grant Application Process that is outlined in the County’s Consolidated Plan and Citizen Participation Plan. OHCD notifies the public of availability of funding through advertisement in local newspapers, as well the YWH Mailing List and the County and YWH websites. Funding priorities, as well as ESG project evaluation criteria are shared with all potential applicants through an annual Grants Application Training session open to all interested Applicants.

All ESG applications received for funding are first evaluated by OHCD staff for project application completeness and performance outcomes as measured through the HMIS database and targets outlined in the ESG Subrecipient Agreement. The annual project monitoring evaluation results conducted by OHCD each year are also taken into consideration when recommending allocation of funds. ESG project Applications are then scored by a team of OHCD staff and staff from the larger Department of Health and Human Services. A list of recommended projects, including ESG funding allocations are then presented to the County Board of Commissioners. The County Commissioners ultimately approve or disapprove those recommendations though a public meeting.

All funded ESG organizations are required to be members of the CoC, execute a Subrecipient Agreement and to enter client level data and outcomes into the County’s HMIS system in accordance to the YWH Data Systems Policy and Procedure Manual. Only the Domestic Violence Agency is exempt from entering client data into the county’s HMIS System. However, the DV agency is required to enter data into an HMIS comparable database.

The HMIS Data Systems Policy and Procedure Manual was developed in consultation with all CoC participating agencies, the YWH Systems Performance Outcomes Action Team and it is regularly updated by the Data Manager in accordance to currently published HMIS Data standards as outlined by HUD, or as needed in order to coordinate and evaluate performance measures and practice outlined in the YWH Operations Manual.
2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities
### Table 2 – Agencies, groups, organizations who participated

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Montgomery County Housing Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>PHA</td>
</tr>
</tbody>
</table>
| **What section of the Plan was addressed by Consultation?** | Housing Need Assessment  
Public Housing Needs |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities. |

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>FAMILY SERVICES OF MONTGOMERY COUNTY</th>
</tr>
</thead>
</table>
| **Agency/Group/Organization Type** | Services-Children  
Services-Persons with Disabilities  
Services-Persons with HIV/AIDS  
Services-Health |
| **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities. |

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Indian Creek Foundation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing</td>
</tr>
</tbody>
</table>
| **What section of the Plan was addressed by Consultation?** | Housing Need Assessment  
Public Housing Needs |
<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Agency/Group/Organization Type</th>
<th>What section of the Plan was addressed by Consultation?</th>
<th>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keystone Opportunity Center</td>
<td>Food Pantry</td>
<td>Homeless Needs - Chronically homeless Non-Homeless Special Needs</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>INTER-FAITH HOUSING ALLIANCE</td>
<td>Housing</td>
<td>Housing Need Assessment</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>POTTSTOWN BOROUGH</td>
<td>Other government - Local</td>
<td>Housing Need Assessment Non-Homeless Special Needs Economic Development</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| The Salvation Army | Services - Housing  
Services-Children  
Services-Elderly Persons  
Services-Persons with Disabilities  
Services-Persons with HIV/AIDS  
Services-homeless  
Services-Health  
Services-Education |
| Housing Need Assessment  
Homeless Needs - Families with children  
Homelessness Strategy  
Non-Homeless Special Needs  
Anti-poverty Strategy | The Salvation Army |
<p>| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities. |</p>
<table>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>YWCA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-Children</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Elderly Persons</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Persons with Disabilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Health</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Education</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Non-Homeless Special Needs</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>9</td>
<td>Agency/Group/Organization</td>
<td>HEDWIG HOUSE INC.</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-Persons with Disabilities</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Homeless Special Needs</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
</tr>
<tr>
<td>10</td>
<td>Agency/Group/Organization</td>
<td>Mosaic Community Land Trust</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
</tr>
<tr>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The County held four public hearings to seek input into the Annual Action Plan and solicited applications from a variety of organizations and asked for a needs discussion as part of the application. Also, ongoing dialogue with participating municipalities provided a current assessment of needs and opportunities.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td><strong>11</strong></td>
<td><strong>RHD Coordinated Homeless Outreach Center</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Agency/Group/Organization</strong></td>
<td><strong>RHD Coordinated Homeless Outreach Center</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td><strong>Services-homeless</strong></td>
<td></td>
</tr>
<tr>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td><strong>Homelessness Strategy</strong></td>
<td></td>
</tr>
<tr>
<td><strong>12</strong></td>
<td><strong>WILLOW GROVE COMMUNITY DEVELOPMENT CORPORATION</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Agency/Group/Organization</strong></td>
<td><strong>WILLOW GROVE COMMUNITY DEVELOPMENT CORPORATION</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td><strong>Housing</strong></td>
<td></td>
</tr>
<tr>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td><strong>Housing Need Assessment</strong></td>
<td></td>
</tr>
</tbody>
</table>

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

The County's Citizen Participation Process was designed to be open and encouraging to all Agency Types. There were no Agency Types that were not consulted during the Consolidated Planning process.
### Other local/regional/state/federal planning efforts considered when preparing the Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Montgomery County CoC</td>
<td>The goals of the Strategic Plan are closely coordinated with the goals of the Continuum of Care. The County of Montgomery is an active participant with the applicant and administering agency for the Continuum of Care.</td>
</tr>
<tr>
<td>PHA 5 Year Plan</td>
<td>Montgomery County Housing Authority</td>
<td>The Goals of the County Housing Authority's Five Year Plan are closely coordinated with the goals of providing affordable housing for the County.</td>
</tr>
<tr>
<td>Montgomery County Analysis of Impediments</td>
<td>Montgomery County</td>
<td>DHCD staff were actively involved in the development and update of the County's AI. Actions to address impediments identified in the AI are incorporated in the Action Plan and CAPERs.</td>
</tr>
<tr>
<td>Montco 2014: A Shared Vision</td>
<td>Montgomery County Planning Commission</td>
<td>A Comprehensive Plan for Montgomery County developed to encourage collaboration and partnerships among governments, businesses, institutions, schools, higher education and other stakeholders.</td>
</tr>
<tr>
<td>Montgomery County 10-Year Plan to End Homelessness</td>
<td>Montgomery County CoC</td>
<td>This comprehensive document outlines the County's priority goals to eliminate homelessness and establishes strategies to realize them, in coordination with the Continuum of Care and the Five Year Consolidated Plan Goals.</td>
</tr>
<tr>
<td>Your Way Home</td>
<td>Strategic Plan 2013-2015</td>
<td>Your Way Home Montgomery County is a transformational partnership between government, philanthropy and nonprofits to solve the problem of homelessness in the County.</td>
</tr>
</tbody>
</table>

Table 3 – Other local / regional / federal planning efforts

**Narrative (optional)**
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

In accordance with 24 CFR 91.115(e), Montgomery County has adopted a Citizen Participation Plan describing the citizen participation requirements of its Federal programs. The full Citizen Participation Plan is on file at the Department of Housing and Community Development. Evidence of citizen participation is included in the Citizen Participation Appendix.

The County provided training workshops on March 13 and 14, 2018 for local government entities and non-profits wishing to apply for funds. Initial citizen participation meetings were held as follows:

March 6, 2018 at 6:00 p.m. - Pottstown, PA

March 8, 2018 at 6:00 p.m. - Norristown, PA

March 21, 2018 at 6:00 p.m. - Willow Grove, PA

A draft of the Annual Action Plan for FY 2018 was placed on public display for 30 days beginning June 22, 2018 and ending July 22, 2018. The display notice was published in several area newspapers of record:

- Intelligencer, Doylestown
- The Mercury, Pottstown
- The Reporter, Lansdale
- The Times Herald, Norristown
- Al Dia, Philadelphia

A public hearing was held on July 11, 2018 to receive citizen comment on the proposed Action Plan. In addition to public input from community meetings and comments broadly solicited, the County invited input from other governmental agencies and nonprofits. Announcement of the availability of the plan was sent to organizations that represent persons with limited English speaking ability, disabilities and low incomes.
In order to reach and provide adequate access to each of the categories of residents the County publicizes notice of upcoming events related to the development and implementation of the Action Plan, including sufficient information about the event subject matter, at least two weeks prior to each event. Events are advertised through the minimum of one of the following methods, depending on event type:

- Non-legal section of those newspapers with general circulation within the County - a Notice of Hearing (for Public Hearings)
- Letters to individual citizens, groups, etc.
- OHCD mailing list and website

All events are held at times and locations convenient to potential and actual beneficiaries. All public hearings will be held in various locations throughout the County. Hearings are held in the evenings or on weekends in order to allow for greater participation. When a "reasonable" amount of non-English speaking citizens are expected to participate, their needs are met by the provision of an appropriate translator. All public hearings are handicap accessible.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>The County conducted three public meetings to solicit input into the preparation of the Action Plan. The meetings were advertised and held as follows: March 6, 2018 at 6:00 p.m. - Pottstown, PA; March 8, 2018 at 6:00 p.m. - Norristown, PA; March 21, 2018 at 6:00 p.m. - Willow Grove, PA</td>
<td></td>
<td>All comments were accepted.</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
</tr>
<tr>
<td>------------</td>
<td>------------------</td>
<td>--------------------</td>
<td>--------------------------------</td>
<td>------------------------------</td>
<td>-----------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>2</td>
<td>Training Meetings</td>
<td>Grant Applicants</td>
<td>On March 13, 2018, the County facilitated a Training Session in HSC AB for HOME/CHDO/HR I from 10:30 to 12:00 On March 13, 2018 the County facilitated a training session in the HSC Community Room for Municipal applicants for CDBG from 9:00 to 12:00 incl: Fair Housing Training On March 14, 2018, the County facilitated a Training Session in HSC A&amp;B for Non-Profit applicants for CDBG/ESG from 9:30 to 12:00</td>
<td>No comments were received at the training sessions. Comments of the training materials and the program applications are included in the Grantee Unique Appendix.</td>
<td>All comments were received.</td>
<td>22</td>
</tr>
</tbody>
</table>

Annual Action Plan 2018
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>On July 11, 2018, a public hearing will be held on the 2018 Annual Action Plan at 6:00 p.m. at the Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA. Interested parties may attend the hearing and present their comments on the Draft Plan.</td>
<td>No Comments were received.</td>
<td>All comments were accepted.</td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach

Annual Action Plan 2018
Expected Resources

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

Introduction

The County of Montgomery anticipates receiving Community Development Block Grant, Emergency Solutions Grant, and HOME Investment Partnerships Program funds, annually from HUD, during the five year period of the 2015-2019 Consolidated Plan.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
<td>Prior Year Resources: $</td>
</tr>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>3,267,341</td>
<td>0</td>
<td>765,259</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Expected Amount Available Remainder of ConPlan</td>
<td>Narrative Description</td>
</tr>
<tr>
<td>---------</td>
<td>----------------</td>
<td>---------------</td>
<td>----------------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
<td>Prior Year Resources: $</td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition</td>
<td>1,329,959</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homebuyer assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homeowner rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental new construction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>New construction for ownership</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>TBRA</td>
<td>1,329,959</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing</td>
<td>265,971</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Financial Assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overnight shelter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rapid re-housing (rental assistance)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rental Assistance Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Transitional housing</td>
<td>265,971</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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 following private, state, and local funds are anticipated to leverage Federal Funds:

Montgomery County Affordable Housing Trust Funds (AHTF). The Pennsylvania Optional County Affordable Housing Funds Act of 1992 (the Act) allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds for recording deeds and mortgages. As of 2014, the County raised the fee from $13 to $26 per document. 85 percent of the revenues are to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure HUD HOME funds, construction or rehabilitation financing, housing related services, match for other State or federal funds, rapid-rehousing, homelessness prevention, and supporting first-time homebuyer second mortgage programs.

Homeowners Emergency Mortgage Assistance Program (HEMAP) is available through the Pennsylvania Housing Finance Agency (PHFA). HEMAP provides loans to help bring delinquent mortgage payments current. Households may be eligible for continuing monthly payment assistance. Total assistance cannot exceed 24 monthly payments or $60,000. HEMAP assistance is available in Montgomery County through PHFA approved counseling agency list. The State, through PHFA uses a portion of its qualified mortgage bond issuing authority for the purpose of issuing Mortgage Credit Certificates (MCC) to qualified first-time homebuyers State-wide. A MCC entitles the certificate holder to take a credit against his federal income taxes in an amount equal to an authorized percentage of the annual interest paid on the certificate holder’s mortgage, subject to limitations. The issuance of MCC is governed by the provisions of the US Internal Revenue Code, (the Code) as amended and applicable regulations issued from time to time under (the Regulations).

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

There is no publically owned land or property owned by the County of Montgomery designated to be used to address the needs identified in the plan.

Discussion

Private financial institutions in Montgomery County participating in the County’s first-time homebuyer program include Citizens Bank, PNC Mortgage Corporation, Hatboro Federal Savings, Harleysville National Bank, Univest Corporation. The County provides closing cost and/or down payment assistance to eligible program participants, and works in conjunction with the participants in securing mortgage financing from the private sources. The financial institutions hold loans in their mortgage portfolio.
## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rehabilitation &amp; Preservation of Housing Stock</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Rehabilitation of The Current Housing Stock</td>
<td>CDBG: $250,000</td>
<td>Rental units rehabilitated: 0 Household Housing Unit</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Homeowner Housing Rehabilitated: 10 Household Housing Unit</td>
</tr>
<tr>
<td>2</td>
<td>Create New Affordable Rental Housing</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Expand Rental Housing Stock</td>
<td>HOME: $1,025,063</td>
<td>Rental units constructed: 22 Household Housing Unit</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Provide Tenant-Based Rental Assistance</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Strategic Use of Tenant-Based Rental Vouchers</td>
<td>HOME: $121,900</td>
<td>Tenant-based rental assistance / Rapid Rehousing: 32 Households Assisted</td>
</tr>
<tr>
<td>Sort Order</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Geographic Area</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------------------------------------</td>
<td>------------</td>
<td>----------</td>
<td>--------------------------------------</td>
<td>--------------------------</td>
<td>-----------------------------------------------</td>
<td>----------------------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>Public Facility &amp; Infrastructure Improvements</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>County-wide</td>
<td>Non-Housing Community Development Needs</td>
<td>CDBG: $1,687,220</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 36636 Persons Assisted</td>
</tr>
<tr>
<td>7</td>
<td>Support Vital Public Services</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>County-wide</td>
<td>Non-Housing Community Development Needs</td>
<td>CDBG: $93,100</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 131 Persons Assisted</td>
</tr>
<tr>
<td>9</td>
<td>Support Planning &amp; Administration</td>
<td>2015</td>
<td>2019</td>
<td>Planning and Administration</td>
<td>County-wide</td>
<td>Planning and Administration</td>
<td>CDBG: $540,000</td>
<td>Other: 1 Other</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>HOME: $132,996</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>ESG: $19,947</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Create New Affordable Home Ownership Opportunities</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>County-wide</td>
<td>Expanding Homeownership</td>
<td>HOME: $50,000</td>
<td>Homeowner Housing Added: 5 Household Housing Unit</td>
</tr>
<tr>
<td>11</td>
<td>Section 108 Repayment</td>
<td>2017</td>
<td>2019</td>
<td>Section 108 Repayment</td>
<td>County-wide</td>
<td>Planning and Administration</td>
<td>CDBG: $925,047</td>
<td>Other: 1 Other</td>
</tr>
</tbody>
</table>

Table 6 – Goals Summary

Goal Descriptions
<table>
<thead>
<tr>
<th>1</th>
<th><strong>Goal Name</strong></th>
<th>Rehabilitation &amp; Preservation of Housing Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Goal Description</strong></td>
<td>Rehabilitation of the current housing stock. The County will continue to support housing rehabilitation programs, such as the county-wide homeowner rehabilitation program, and rehabilitation of the affordable rental housing stock. In addition, the County supports the efforts of nonprofits and other organizations to provide weatherization and lead-based paint hazard control, accessibility improvements, and housing repair programs. Promote the rehabilitation and preservation of the existing affordable housing stock (homeowner and rental) through partnerships with agencies that provide housing rehabilitation assistance. Support initiatives by local organizations and municipal sponsors to provide rehabilitation, energy efficiency/weatherization, accessibility modifications and lead-based paint hazard control</td>
<td></td>
</tr>
</tbody>
</table>

Project 8: Rehabilitation of owner occupied housing units - 10 units - $250,000
<table>
<thead>
<tr>
<th>2</th>
<th>Goal Name</th>
<th>Create New Affordable Rental Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>The County will continue to support new housing construction of rental units. To address unmet or overburdened needs, the County encourages projects that include the following: those that provide project based rental assistance; those serving the lowest income households; set-asides for disabled households; and units with supportive services for seniors 65 and over. Creation of new affordable rental housing for households below 80% of the area median income. The 2018 year objectives is to collaborate with developers to develop affordable rental housing. Project #10 - New Rental Housing - Home funds $500,000 - 11 units (Advanced Living) Project #11 - New Rental Housing - Home funds $525,063.10 - 11 units (Ingerman/Genesis Willow at East Greenville)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4</th>
<th>Goal Name</th>
<th>Provide Tenant-Based Rental Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>Project #12 - $27,900 - 4 persons Project #13 - $70,000 - 20 persons Project #14 - $24,000 - 8 persons Provide units of Tenant-Based Rental Assistance annually to provide suitable housing for at-risk and special needs populations.</td>
</tr>
<tr>
<td>5</td>
<td>Goal Name</td>
<td>Homeless Prevention &amp; Support Activities</td>
</tr>
<tr>
<td>---</td>
<td>----------------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Goal Description</td>
<td>Priority strategies that the County will work on in 2018:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Improve Data Collection and Analysis</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Expand Housing Models and Opportunities for Homeless Individuals and Families</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Increase Homeless Prevention Efforts through discharge planning and better use of mainstream services</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Expand and Target Supportive Services</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #7 - CDBG $397,000 - 1,229 shelter assistance</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #9 - ESG $246,024 - 125 Rapid Rehousing units</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6</th>
<th>Goal Name</th>
<th>Public Facility &amp; Infrastructure Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>Support improvements to or construction of public facilities. Public facilities in Montgomery County are important in improving the quality of life by supporting needs for open space and recreational needs, providing spaces for provision of services, and holding of events that bring the community together. Many of the existing public facilities are old and in need of improvements to treat lead paint and improve accessibility. Preference will be given to public facilities that are supported by consideration of a comprehensive and inclusive list of improvements that support those funded by the County, avoiding piece meal development and improvement of public facilities.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Improve and maintain infrastructure. Maintaining and improving the infrastructure is important in support of the long-term viability of the communities as a place to live, operate a business, and to work.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #2 Street Improvements - $390,995 - 9,029 persons</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #3 Sidewalk Improvements - $769,670 - 22,150 persons</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #4 Water/Sewer Improvements - $274,569 - 2,595 persons</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project #5 Public Facility - $392,220 - 2,862 persons</td>
</tr>
<tr>
<td>7</td>
<td>Goal Name</td>
<td>Support Vital Public Services</td>
</tr>
<tr>
<td>---</td>
<td>----------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td></td>
<td>Goal Description</td>
<td>There are varied public services available in the community to address service needs. There continue to be service needs that are important to the long-term ability of persons to sustain themselves and in support of their health and safety. Within the county, there is a network of social service agencies that provide service and training for senior citizens, youth, disabled persons, battered spouses, and abused children. The County will prioritize public services dollars available to those areas when significant gaps are identified.</td>
</tr>
<tr>
<td></td>
<td>Project #6 Public Services</td>
<td>$93,100</td>
</tr>
<tr>
<td></td>
<td>131 persons</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9</th>
<th>Goal Name</th>
<th>Support Planning &amp; Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>Support planning and administration of community development. On-going planning is needed to ensure efficiency in administration of programs, coordination of resources, and proper management in agreement with regulations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10</th>
<th>Goal Name</th>
<th>Create New Affordable Home Ownership Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>Opportunities for homeownership will continue to be supported by providing first-time homebuyers with downpayment and closing cost assistance, requiring pre-purchase counseling, and expanding the housing stock of affordable homes for sale.</td>
</tr>
<tr>
<td></td>
<td>Project No. 15 - Montgomery County Housing Authority (HOME)</td>
<td>$50,000 - 5 units</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11</th>
<th>Goal Name</th>
<th>Section 108 Repayment</th>
</tr>
</thead>
</table>
Projects

AP-35 Projects – 91.220(d)

Introduction

With input from a variety of stakeholders, with data from a variety of sources, including the Montco 2040: A Shared Vision report, and with hands-on experience in front-line services to the most vulnerable populations in the County, Montgomery plans a mix of activities in FY 2018 to address a wide range of challenges for those populations. Infrastructure improvements, housing rehab, recreation facilities and programming and support for area business are just some of the approaches to improving neighborhoods, houses and, most importantly, families in the County.

## Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>MONTCO CDBG/HOME/ESG Planning &amp; Admin</td>
</tr>
<tr>
<td>2</td>
<td>MONTCO CDBG Street Improvements Project</td>
</tr>
<tr>
<td>3</td>
<td>MONTCO CDBG Sidewalk Improvements Project</td>
</tr>
<tr>
<td>4</td>
<td>MONTCO CDBG Water/Sewer Improvements Projects</td>
</tr>
<tr>
<td>5</td>
<td>MONTCO CDBG Public Facility Improvements Project</td>
</tr>
<tr>
<td>6</td>
<td>MONTCO CDBG Public Services</td>
</tr>
<tr>
<td>7</td>
<td>MONTCO CDBG Homeless Support and Prevention</td>
</tr>
<tr>
<td>8</td>
<td>MONTCO CDBG Housing Rehabilitation</td>
</tr>
<tr>
<td>9</td>
<td>HESG 2018</td>
</tr>
<tr>
<td>10</td>
<td>HOME Advanced Living - The Chalet</td>
</tr>
<tr>
<td>11</td>
<td>HOME Willow @ East Greenville</td>
</tr>
<tr>
<td>12</td>
<td>HOME Family Services TBRA</td>
</tr>
<tr>
<td>13</td>
<td>HOME Hedwig House TBRA</td>
</tr>
<tr>
<td>14</td>
<td>HOME Valley Youth House TBRA</td>
</tr>
<tr>
<td>15</td>
<td>HOME Montgomery County Housing Authority Homeownership Program</td>
</tr>
<tr>
<td>16</td>
<td>Section 108 Loan Repayment</td>
</tr>
</tbody>
</table>

Table 7 - Project Information

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

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. Montgomery County partners with public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting
underserved needs include:

- Increased need for affordable housing and supportive services resulting from economic downturn – while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and
- Increased foreclosures & unemployment – in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure rate, the associated problem of poor credit, and rising unemployment.

As demonstrated in the preceding sections, the County administers and supports a wide array of programs to expand housing choice and provide shelter and services. The Urban County’s FY 2018 allocations address obstacles of affordability and availability of housing and homeownership financing, opening more opportunities for lower-income households. However, obstacles such as the high cost of housing in Montgomery County being prohibitive to a large number of working poor families will remain due to the scale of these problems and the limited resources available for their resolution.
AP-38 Project Summary

Project Summary Information
<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>MONTCO CDBG/HOME/ESG Planning &amp; Admin</td>
<td>1. Housing Equality Center $50,000 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers and housing agencies that serve the protected classes. 2. Housing &amp; Community Development - Administration $490,000 3. ESG Administration - $19,947 4. HOME Administration - $132,995.90</td>
</tr>
<tr>
<td></td>
<td>County-wide</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Support Planning &amp; Administration</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Planning and Administration</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CDBG: $540,000</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HOME: $132,996</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ESG: $19,947</td>
<td></td>
</tr>
<tr>
<td></td>
<td>12/31/2019</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Not applicable.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Housing Equality Center - office located at 455 Maryland Drive, Suite 190, Fort Washington, PA 19034</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Housing &amp; Community Development - Administration, Montgomery County Offices</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. ESG Administration - Montgomery County Offices</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. HOME Administration - Montgomery County Offices</td>
<td></td>
</tr>
</tbody>
</table>
|   | 1. Housing Equality Center $50,000 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers and housing agencies that serve the protected classes. 2. Housing & Community Development - Administration $490,000 3. ESG Administration - $19,947 4. HOME Administration - $132,995.90 | Planned Activities

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>MONTCO CDBG Street Improvements Project</td>
<td>1. Housing Equality Center $50,000 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers and housing agencies that serve the protected classes. 2. Housing &amp; Community Development - Administration $490,000 3. ESG Administration - $19,848 4. HOME Administration - $93,612</td>
</tr>
<tr>
<td></td>
<td>County-wide Low Mod Block Group</td>
<td></td>
</tr>
<tr>
<td></td>
<td>County-wide</td>
<td></td>
</tr>
</tbody>
</table>

**Location Description**

1. Housing Equality Center - office located at 455 Maryland Drive, Suite 190, Fort Washington, PA 19034
2. Housing & Community Development - Administration, Montgomery County Offices
3. ESG Administration - Montgomery County Offices
4. HOME Administration - Montgomery County Offices

**Planned Activities**

1. Housing Equality Center $50,000 - Provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers and housing agencies that serve the protected classes.
2. Housing & Community Development - Administration $490,000
3. ESG Administration - $19,848
4. HOME Administration - $93,612

**Target Date**

12/31/2019

**Estimate the number and type of families that will benefit from the proposed activities**

Not applicable.
<table>
<thead>
<tr>
<th>Goals Supported</th>
<th>Public Facility &amp; Infrastructure Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Needs Addressed</td>
<td>Non-Housing Community Development Needs</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $390,995</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>1. Bridgeport Borough Street Rehabilitation $200,000 - mill and pave 200,512 SF and base repair for 333 SY. 2. Pottstown Borough - High Street Lighting LED Conversion $190,995 - conversion of 77 streetlights from high pressure sodium to LED.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Bridgeport Borough - 4,554; Pottstown Borough - 4,475.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>1. Bridgeport Borough - various streets including Bush, Grove, Mill, Prospect, Hurst, Rambo, Green, 7th, 8th and 9th Streets. Pottstown Borough - High Street from Hanover to Evans Street and two adjacent public parking lots.</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>1. Bridgeport Borough Street Rehabilitation $200,000 - mill and pave 200,512 SF and base repair for 333 SY. 2. Pottstown Borough - High Street Lighting LED Conversion $190,995 - conversion of 77 streetlights from high pressure sodium to LED.</td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td>MONTCO CDBG Sidewalk Improvements Project</td>
</tr>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide Low Mod Block Group</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Public Facility &amp; Infrastructure Improvements</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Non-Housing Community Development Needs</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $769,670</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>1. Cheltenham Township - $200,000 - replace/reconstruct concrete curb and sidewalk, remove and replace street trees including installation of tree grates, and reconstruct curb ramps on Euston Road. 2. Collegeville Borough - $55,370 - installation of ADA compliant ramps at two areas near the Collegeville Borough Community Park. 3. Royersford Borough - $115,830 - replace 27 ADA ramps that do not meet the ADA accessibility requirements. 4. Souderton Borough - $198,470 - remove and replace curb and sidewalk (1,510 LF of concrete curb and 9,201 SF of 5 1/2' wide sidewalk) along Hillside Avenue, including the reconstruction of ADA handicapped ramps. 5. Telford Borough - $200,000 - reconstruction of fifty handicap ramps, associated curb depressions and truncated dome systems at various intersections.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Cheltenham Township - 4,689; Collegeville Borough - 5,089; Royersford Borough - 4,752; Souderton Borough - 6,525; Telford Borough - 1,095.</td>
</tr>
</tbody>
</table>
| **Location Description** | 1. Cheltenham Township - Euston Road between Cheltenham Avenue and Erlen Road  
2. Collegeville Borough - Collegeville Borough Community Park located on West 3rd and 4th Avenue  
3. Royersford Borough - 4th Avenue and Spring Street, 4th Avenue and Washington, 5th Avenue and Spring Street, 5th Avenue and Washington, 6th Avenue and Washington, 7th Avenue and Washington, and 7th Avenue and Church Street  
4. Souderton Borough - Hillside Avenue  
5. Telford Borough - Main Street |
### Planned Activities

1. Cheltenham Township - $200,000 - replace/reconstruct concrete curb and sidewalk, remove and replace street trees including installation of tree grates, and reconstruct curb ramps on Euston Road.  
2. Collegeville Borough - $55,370 - installation of ADA compliant ramps at two areas near the Collegeville Borough Community Park.  
3. Royersford Borough - $115,830 - replace 27 ADA ramps that do not meet the ADA accessibility requirements.  
4. Souderton Borough - $198,470 - remove and replace curb and sidewalk (1,510 LF of concrete curb and 9,201 SF of 5 1/2' wide sidewalk) along Hillside Avenue, including the reconstruction of ADA handicapped ramps.  
5. Telford Borough - $200,000 - reconstruction of fifty handicap ramps, associated curb depressions and truncated dome systems at various intersections.

<table>
<thead>
<tr>
<th>4</th>
<th>Project Name</th>
<th>MONTCO CDBG Water/Sewer Improvements Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide Low Mod Block Group</td>
<td></td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Public Facility &amp; Infrastructure Improvements</td>
<td></td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Non-Housing Community Development Needs</td>
<td></td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $274,569</td>
<td></td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>1. Lansdale Borough ($134,335) - sewer improvements including one reconstructed sewer inlet, installation of eight new handicapped curb ramps, lining of 640 LF of sanitary sewer and 651 LF of reconstructed paving.</td>
<td></td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
<td></td>
</tr>
</tbody>
</table>
| **Estimate the number and type of families that will benefit from the proposed activities** | Lansdale Borough - Residents of Census Tract 2009, Blockgroup 2, 56% of whom are low-mod income.  
West Pottsgrove - Residents of Census Tract 2092, Blockgroup 1, 60% of whom are low-mod income. |
| **Location Description** | Lansdale Borough - East Third Street between Broad and Chestnut Streets.  
West Pottsgrove - Sylvan Drive between Grosstown Road and Jem Avenue |
| Planned Activities | 1. Lansdale Borough ($134,335) - sewer improvements including one reconstructed sewer inlet, installation of eight new handicapped curb ramps, lining of 640 LF of sanitary sewer and 651 LF of reconstructed paving.  
2. West Pottsgrove ($140,234) - Sylvan Drive Sanitary Sewer Improvements-Replace approximately 415 LF of sanitary sewer main and related appurtenances, remove and replace approximately 150 SY of concrete sidewalk and 30 LF of concrete curbing, and reconstruct approximately 367 SY of roadway on Sylvan Drive between Grosstown Road and Jem Avenue. |

| Project Name | MONTCO CDBG Public Facility Improvements Project |
| Target Area | County-wide |
| Goals Supported | Public Facility & Infrastructure Improvements |
| Needs Addressed | Non-Housing Community Development Needs |
| Funding | CDBG: $392,220 |
| Description | 1. East Greenville Borough - renovations to restrooms at the Borough's police station. 2. Springfield Township - renovations to building entrance and restrooms in order to provide accessibility for persons with disabilities. 3. Upper Hanover Township - ADA improvements to the municipal building. 4. Indian Creek Foundation - bathroom renovations at the Skippack House to make them ADA accessible. 5. MCHA - remove and replace emergency generator at Sidney Pollock House. |
| Target Date | 12/31/2019 |
| Estimate the number and type of families that will benefit from the proposed activities | East Greenville - number of persons with disabilities - 365.  
Springfield Township - number of persons with disabilities - 1703.  
Upper Hanover Township - number of persons with disabilities - 613.  
Indian Creek Foundation - number of persons with disabilities - 1.  
MCHA - serving 180 persons. |
### Location Description

1. East Greenville Borough - 206 Main Street, East Greenville, PA
2. Springfield Township - 1200 Willow Grove Avenue, Wyndmoor, PA
3. Upper Hanover Township - 1704 Pillsbury Road, East Greenville, PA
4. Indian Creek Foundation - 634 Old Skippack Road, Upper Salford, PA
5. MCHA Sidney Pollock House - 450 East High Street, Pottstown, PA

### Planned Activities

1. East Greenville Borough - renovations to restrooms at the Borough’s police station.
2. Springfield Township - renovations to building entrance and restrooms in order to provide accessibility for persons with disabilities. Improvements include installation of ADA parking signs, striping and route signage, replace/adjust ramp slope, installation of code compliant guide rail panels and handrails, modification of interior doors and partitions to provide the proper size and number of fixtures.
3. Upper Hanover Township - ADA improvements to the municipal building including adding handicap parking space, two new ramps, revise sidewalk grade, install electric powered entry door, replace additional door with one that meets accessibility requirements, modify service counter, and renovations to restrooms.
4. Indian Creek Foundation - bathroom renovations at the Skippack House to make them ADA accessible including demolition of the two existing bathrooms and installation of new shower/sink/toilet fixtures, new walls and new tile flooring.
5. MCHA - remove and replace deteriorating oil fed emergency generator, with a new gas fired generator.

<table>
<thead>
<tr>
<th>Location Description</th>
<th>Planned Activities</th>
<th>Project Name</th>
<th>Target Area</th>
<th>Goals Supported</th>
<th>Needs Addressed</th>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Greenville Borough - 206 Main Street, East Greenville, PA</td>
<td>renovations to restrooms at the Borough's police station.</td>
<td>MONTCO CDBG Public Services</td>
<td>County-wide</td>
<td>Support Vital Public Services</td>
<td>Non-Housing Community Development Needs</td>
<td>CDBG: $93,100</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>1. Keystone Opportunity Center ($22,500) - salaries for case management services as part of a Day Center for a shelter program estimated to assist 17 households. 2. Upper Dublin Education Foundation ($25,000) - after school program for grades 1-12, summer day camp to very low-income students ages 6-12 and teen enrichment program for teens aged 13-19 in the North Hills section of Upper Dublin. 3. Bucks County Opportunity Council ($45,600) - an economic self-sufficiency pilot program to assist people with low-income to acquire the education, resources and employment necessary to achieve permanent economic self-sufficiency without future need for subsidies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Approximately 131 County residents, 17 homeless, 25 low income residents, plus 89 youths from low-mod income households.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Location Description** | 1. Keystone Opportunity Center - located at 177 S. Front St., Souderton, PA. Program is administered from offices located at 104 N. Main St., Souderton.  
2. Upper Dublin Education Foundation - North Hills Learning Center at 212 Girard Ave., Glenside, PA. The program is administered by the Upper Dublin Education Foundation with offices at 1580 Fort Washington Ave., Maple Glen, PA 19002.  
3. Bucks County Opportunity Council - 100 Doyle Street, Doylestown, PA |
| **Planned Activities** | 1. Keystone Opportunity Center ($22,500) - salaries for case management services as part of a Day Center for a shelter program estimated to assist 17 households.  
2. Upper Dublin Education Foundation ($25,000) - after school program for grades 1-12, summer day camp to very low-income students ages 6-12 and teen enrichment program for teens aged 13-19 in the North Hills section of Upper Dublin.  
3. Bucks County Opportunity Council ($45,600) - an economic self-sufficiency pilot program to assist people with low-income to acquire the education, resources and employment necessary to achieve permanent economic self-sufficiency without future need for subsidies. |

<p>| <strong>Project Name</strong> | MONTCO CDBG Homeless Support and Prevention |
| <strong>Target Area</strong> | County-wide |
| <strong>Goals Supported</strong> | Homeless Prevention &amp; Support Activities |</p>
<table>
<thead>
<tr>
<th><strong>Needs Addressed</strong></th>
<th>Homeless Prevention</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $397,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>1. Interfaith Hospitality Network of the Main Line ($20,000) - funding will support the staff costs at an emergency shelter Day Center for homeless families referred by the Your Way Home Call Center. 2. Inter-Faith Housing Alliance ($30,000) - funding will support the cost of case managers and a Community Resource Manager as well as Employee benefits. 3. Laurel House ($25,000) - funding to support wages and employer-paid taxes for staff positions - Shelter Manager ($27,606.33), Senior Director of Housing ($20,262.31) and utilities ($7,840). These positions manage and provide day to day operations of the shelter where clients receive temporary housing, counseling, legal advocacy and assistance in securing safe transitional/permanent housing upon exit. 4. Resources for Human Development ($72,000) - funding to support an Emergency shelter for single men and women including Code Blue services including funds for emergency shelter operations and case management. 5. Salvation Army Norristown ($110,000) - funding to support shelter operations for a 24/7 emergency shelter to homeless families throughout Montgomery County including Code Blue services. 6. Salvation Army Pottstown ($140,000) - funding to support shelter operations for a 24/7 emergency shelter to homeless families throughout Montgomery County including Code Blue services.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>1,229 homeless individuals.</td>
</tr>
</tbody>
</table>
| **Location Description** | 1. Interfaith Hospitality Network of the Main Line - 1449 DeKalb Street, Norristown, PA  
2. Inter-Faith Housing Alliance - 31 S. Spring Garden Street, Ambler, PA  
3. Laurel House - 605 Swede Street, Norristown, PA  
4. Resources for Human Development - Building 9 on the ground of the Norristown State Hospital located at 1001 Sterigere St, Norristown, PA 19401  
5. Salvation Army Norristown - 533 Swede St., Norristown, PA 19401  
6. Salvation Army Pottstown - 137 King Street, Pottstown, PA 19464 |
### Planned Activities

1. **Interfaith Hospitality Network of the Main Line** ($20,000) - funding will support the staff costs at an emergency shelter Day Center for homeless families referred by the Your Way Home Call Center. Clients served:

2. **Inter-Faith Housing Alliance** ($30,000) - funding will support the cost of case managers and a Community Resource Manager as well as Employee benefits. Clients served: 64.

3. **Laurel House** ($25,000) - funding to support wages and employer-paid taxes for staff positions - Shelter Manager ($27,606.33), Senior Director of Housing ($20,262.31) and utilities ($7,840). These positions manage and provide day to day operations of the shelter where clients receive temporary housing, counseling, legal advocacy and assistance in securing safe transitional/permanent housing upon exit. Clients served: 150.

4. **Resources for Human Development** ($72,000) - funding to support an Emergency shelter for single men and women including Code Blue services including funds for emergency shelter operations and case management. Clients served:

5. **Salvation Army Norristown** ($110,000) - funding to support shelter operations for a 24/7 emergency shelter to homeless families throughout Montgomery County including Code Blue services. Clients served:

6. **Salvation Army Pottstown** ($140,000) - funding to support shelter operations for a 24/7 emergency shelter to homeless families throughout Montgomery County including Code Blue services. Clients served:

### Project Name

<table>
<thead>
<tr>
<th>Project Name</th>
<th>MONTCO CDBG Housing Rehabilitation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Rehabilitation &amp; Preservation of Housing Stock</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Rehabilitation of The Current Housing Stock</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $250,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Genesis Housing Corporation - continuation of the Homeowner Rehab Program to provide lower income homeowners, especially senior citizens and disabled persons, with safe and decent housing.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2020</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Approximately 10 homes will undergo rehabilitation.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Genesis Housing is located at 1430 DeKalb Street, Norristown, PA 19401</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Genesis Housing Corporation - continuation of the Homeowner Rehab Program to provide lower income homeowners, especially senior citizens and disabled persons, with safe and decent housing.</td>
</tr>
<tr>
<td>-------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Project Name</td>
<td>HESG 2018</td>
</tr>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Homeless Prevention &amp; Support Activities</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homeless Prevention</td>
</tr>
<tr>
<td>Funding</td>
<td>ESG: $246,024</td>
</tr>
<tr>
<td>Description</td>
<td>1. ($86,442) - Funds will support Rapid Re-housing Rental Subsidies and case management services to homeless individuals and families referred through the Your Way Home program after a pre-screening process to confirm homelessness. A Housing Stability Tool will be used to determine priority areas for assistance and establish a housing stability plan. The Housing Stability Coach and Housing Locator will provide case management while client is in the program. 2. Street Outreach ($159,582) - to verify, engage, and help connect homeless individuals to housing across Montgomery County. Note that this funding is being awarded via RFP.</td>
</tr>
<tr>
<td>Target Date</td>
<td>12/31/2019</td>
</tr>
</tbody>
</table>
| Estimate the number and type of families that will benefit from the proposed activities | Approximately 125 homeless individuals.  
Rapid Rehousing - 25 Household (and/or 75 clients) will be served thru case management and rental assistance.  
Street outreach - approximately 50 homeless individuals will benefit from the proposed activity. |
<p>| Location Description | Will be administered out of offices that have yet to be determined. Outreach will be throughout the County.                         |
| Planned Activities | 1. ($86,442) - Funds will support Rapid Re-housing Rental Subsidies and case management services to homeless individuals and families referred through the Your Way Home program after a pre-screening process to confirm homelessness. A Housing Stability Tool will be used to determine priority areas for assistance and establish a housing stability plan. The Housing Stability Coach and Housing Locator will provide case management while client is in the program. 2. Street Outreach ($159,582) - to verify, engage, and help connect homeless individuals to housing across Montgomery County. Note that this funding is being awarded via RFP. |</p>
<table>
<thead>
<tr>
<th>Project Name</th>
<th>HOME Advanced Living - The Chalet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Create New Affordable Rental Housing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Expand Rental Housing Stock</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $500,000</td>
</tr>
<tr>
<td>Description</td>
<td>Acquisition and minor rehabilitation of an existing building once used as a dormitory located at 2748 Cowpath Road in Hatfield, PA. When completed the facility will house 15 units of Rapid Re-housing for clients of the Your Way Home Homeless Assistance Program, a public-private partnership working to reduce homelessness throughout the County. There will be seven efficiency units and eight one-bedroom apartments as well as community space to be used by a variety of visiting supportive service providers assisting residents with self-sufficiency training.</td>
</tr>
<tr>
<td>Target Date</td>
<td>12/31/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>15 HOME targeted for low income residents.</td>
</tr>
<tr>
<td>Location Description</td>
<td>2748 Cowpath Road, Hatfield, PA</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Acquisition and minor rehabilitation of an existing building once used as a dormitory located at 2748 Cowpath Road in Hatfield, PA. When completed the facility will house 15 units of Rapid Re-housing for clients of the Your Way Home Homeless Assistance Program, a public-private partnership working to reduce homelessness throughout the County. There will be seven efficiency units and eight one-bedroom apartments as well as community space to be used by a variety of visiting supportive service providers assisting residents with self-sufficiency training.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>HOME Willow @ East Greenville</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>County-wide</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Create New Affordable Rental Housing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Expand Rental Housing Stock</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $525,063</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Historic conversion of the current SOS Products building located at 329 and 401 W. Fourth Street in the Borough of East Greenville. It will be a mixed-income multi-family rental facility that will create 71 high quality, spacious new apartment units of which 60 will be @60% of AMI or below. The new building will have 1 Your Way Home unit, 4 Sec. 811 units, 8 handicap accessible units and 11 market rate units. It will consist of 1 efficiency unit, 21 one-bedroom units, 34 two-bedroom units and 15 three-bedroom units.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2021</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>71 families, including 60 families at 60% AMI and below. 11 units will be HOME units.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>329 and 401 W. Fourth Street, East Greenville, PA</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Historic conversion of the current SOS Products building located at 329 and 401 W. Fourth Street in the Borough of East Greenville. It will be a mixed-income multi-family rental facility that will create 71 high quality, spacious new apartment units of which 60 will be @60% of AMI or below. The new building will have 1 Your Way Home unit, 4 Sec. 811 units, 8 handicap accessible units and 11 market rate units. It will consist of 1 efficiency unit, 21 one-bedroom units, 34 two-bedroom units and 15 three-bedroom units.</td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td>HOME Family Services TBRA</td>
</tr>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Strategic Use of Tenant-Based Rental Vouchers</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>HOME: $27,900</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Tenant Based Rental Assistance for homeless or near homeless persons infected with HIV/AIDS. Rental assistance for up to four families will be assisted.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2020</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>4 families</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Countywide</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Tenant Based Rental Assistance for homeless or near homeless persons infected with HIV/AIDS. Rental assistance for up to four families will be assisted.</td>
</tr>
<tr>
<td>------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td>HOME Hedwig House TBRA</td>
</tr>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Strategic Use of Tenant-Based Rental Vouchers</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>HOME: $70,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Tenant based rental assistance for 15 extremely low income (30% AMI) special needs households that are at risk of being homeless. An additional 5 individual units can be included giving this application rental subsidy for a total of 20 households for 12 months.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2020</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>20 families</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>countywide</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Tenant based rental assistance for 15 extremely low income (30% AMI) special needs households that are at risk of being homeless. An additional 5 individual units can be included giving this application rental subsidy for a total of 20 households for 12 months.</td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td>HOME Valley Youth House TBRA</td>
</tr>
<tr>
<td><strong>Target Area</strong></td>
<td>County-wide</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Provide Tenant-Based Rental Assistance</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Strategic Use of Tenant-Based Rental Vouchers</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>HOME: $24,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Tenant Based Rental Assistance for Valley Youth Housing 101 Program, which coordinates rental assistance and supportive services to 8 single unaccompanied homeless youth age 18-24. The clients will work within the Independent Living 101 Program established in 1978 what delivers methods that best serve this population. This funding request will be targeted to the TBRA vouchers, monthly rent, for each participant.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2020</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>8 homeless individuals</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Location Description</td>
<td>Countywide</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Tenant Based Rental Assistance for Valley Youth Housing 101 Program, which coordinates rental assistance and supportive services to 8 single unaccompanied homeless youth age 18-24. The clients will work within the Independent Living 101 Program established in 1978 what delivers methods that best serve this population. This funding request will be targeted to the TBRA vouchers, monthly rent, for each participant.</td>
</tr>
</tbody>
</table>

**Project Name**: HOME Montgomery County Housing Authority Homeownership Program  
**Target Area**: County-wide  
**Goals Supported**: Create New Affordable Home Ownership Opportunities  
**Needs Addressed**: Expanding Homeownership  
**Funding**: HOME: $50,000  
**Description**: Provide funds for 5 low income clients moving from a rental voucher to homeownership. Assistance not to exceed $10,000 to cover down payment, closing and other associated costs.  
**Target Date**: 12/31/2021  

<table>
<thead>
<tr>
<th>Estimate the number and type of families that will benefit from the proposed activities</th>
<th>5 families</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location Description</td>
<td>Countywide</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Provide funds for 5 low income clients moving from a rental voucher to homeownership. Assistance not to exceed $10,000 to cover down payment, closing and other associated costs.</td>
</tr>
</tbody>
</table>

**Project Name**: Section 108 Loan Repayment  
**Target Area**: County-wide  
**Goals Supported**: Section 108 Repayment  
**Needs Addressed**: Planning and Administration  
**Funding**: CDBG: $925,046  
**Description**: Section 108 Loan Repayment for the former Logan Square Development
<table>
<thead>
<tr>
<th><strong>Target Date</strong></th>
<th>8/1/2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Not applicable</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Not applicable</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Section 108 Loan Repayment for the former Logan Square Development</td>
</tr>
</tbody>
</table>
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

Montgomery County is designated as an Urban County by HUD. As used throughout this document, the term Urban County refers to the area of Montgomery County outside of the Municipality of Norristown and Abington and Lower Merion Townships. These communities receive direct HUD funding and are not part of the funded program area for Montgomery County. Also not included in the Urban County are Conshohocken Borough and Limerick and Marlborough Townships, as these municipalities have opted to participate in the State CDBG program.

The following narrative describes the characteristics of the areas in Montgomery County where a majority of low and moderate income persons reside. Because 70% of the County’s CDBG funds must benefit low and moderate income persons, a significant portion of the County’s CDBG funds may be spent in these areas. However, the County is also committed to investing CDBG resources in other non-impacted areas of Montgomery County while continuing to benefit low and moderate income persons.

Based on Census results from 2010 American Community Survey estimates, it is apparent that the Urban County is equally as diverse as the state of Pennsylvania. This is due in part to the increasing diversity among the races and ethnicities at both the state and county levels. The percent of Whites in Montgomery County per the 2010 Census was 84%, The percentage of Blacks/African Americans was 9% (up from 6.6% in 2000), Asian/Pacific Islanders 7% (up from 5.7% in 2000), and people of Hispanic origin was 4% (up from 3.6% in 2000).

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>County-wide Low Mod Block Group</td>
<td>71</td>
</tr>
<tr>
<td>County-wide</td>
<td>29</td>
</tr>
</tbody>
</table>

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Each of the activities to be funded in FY2018 reflects a High Priority identified in the County’s Five Year Plan. Some projects are at specific locations and some of the projects serve a specific geographic area or the entire community. Projects addressing public facility needs and infrastructure needs are at site-specific locations serving low-income areas or benefiting low-income consumers in the area. The map in the Grantee Unique Appendix shows the location of site-specific projects. Where projects serve specific geographic areas, those service areas are noted in AP-35.

HOME funds have been allocated for a variety of projects this year. HOME funds will be used for
development of affordable rental housing; CHDO Operating funds; and Acquisition/Rehab/Resale of units in various communities. Affordable Housing Trust Funds will be used for activities including: Tenant-based rental assistance will be made available for two special needs populations – elderly who might otherwise be placed in a nursing home or who can be relocated from a nursing home, and persons with disabilities; construction of new housing; the Homebuyer program; leveraging for the homeless programs; and, rehabilitation of public housing units.

A map depicting the low-mod block groups is included in the Grantee Unique Appendices section and identifies areas where site specific activities proposed for PY2018 are located.

In Montgomery County, there are three municipalities where the percentage of Black/African Americans exceeds the percentage in the County by 10%. The percentage of Black/African Americans in the County was 8.7% in 2010. The percentage in Cheltenham Township was 31.1%; the percentage in Norristown was 35%; and the percentage in Pottstown was 19.5%. No other minorities exceeded the percentages in the County.

In addition, persons of Hispanic origin represented 1.7% of the population in the County. Therefore, an area of ethnic concentration includes municipalities where the percentage of Hispanics is 11.7% or higher. There were no municipalities that met this criterion.

There were 15 municipalities identified as having at least one LMI block group, with four of those municipalities – Bridgeport, East Greenville, Royersford, and West Pottsgrove Township – having at least half of their block groups as LMI areas. Of the 15 municipalities, only Cheltenham Township was noted to be an area of minority/Hispanic concentration as well.

Discussion
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The County anticipates focusing its CDBG, ESG and HOME entitlement funds towards improving the quality of life in neighborhoods for extremely low, very low, and low income households, and to preserve and increase the stock of affordable owner and renter housing units. The following objectives have been established:

1. Expand homeownership – develop new homeownership opportunities through first-time homebuyer assistance, new construction and substantial rehabilitation of blighted housing.
2. Preserve existing housing – provide assistance to lower income homeowners to rehabilitate their homes to meet code standards.
3. Expand rental housing – provide assistance to developers to construct new rental housing or conversion of non-residential facilities into housing.
4. Support the actions of the Montgomery County Housing Authority to improve public housing.
5. Support the actions of developers (non-profit and for-profit) seeking funds to develop housing to address the needs of persons with disabilities and the elderly.
6. Support the development of new permanent supportive housing for persons who need more than just an apartment to end the cycle of homelessness.
7. Strategically use the allocation of Tenant Based Rental Assistance Vouchers

### One Year Goals for the Number of Households to be Supported

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
<td>1,229</td>
</tr>
<tr>
<td>Non-Homeless</td>
<td>15,432</td>
</tr>
<tr>
<td>Special-Needs</td>
<td>28,417</td>
</tr>
<tr>
<td>Total</td>
<td>45,078</td>
</tr>
</tbody>
</table>

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

### One Year Goals for the Number of Households Supported Through

<table>
<thead>
<tr>
<th>Support Type</th>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
<td>32</td>
</tr>
<tr>
<td>The Production of New Units</td>
<td>82</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
<td>10</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>124</td>
</tr>
</tbody>
</table>

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

Projects funded in 2018 with CDBG and HOME funds to address one-year goals and actions for affordable housing include:

1. HOME Advanced Living - New Construction - New Construction - ($500,000.00): Build units of affordable rental housing for low income County residence. Eleven units will be designated HOME units. (HOME funds.)

2. Ingerman/Genesis –($525,063.10): Historic conversion of the current SOS Products building located at 329 and 401 W. Fourth Street in the borough of East Greenville. It will be a mixed-income multi-family rental facility that will create approximately 71 high quality, spacious new apartment units of which 60 will be @ 60% of AMI or below. The new building will have 1 Your Way Home unit, 4 Sec. 811 units, 8 handicap accessible units, and 11 market rate units. It will consist of 1 efficiency unit, 21 one-bedroom units, 34 two-bedroom units, and 15 three-bedroom units. (HOME funds).

3. Montgomery County Housing Authority - ($50,000.00): Provide funds for 10 low income clients moving from a rental voucher to homeownership. Assistance not to exceed $10,000 to cover down payment, closing and other associated costs. (HOME funds).

4. Genesis Housing Corp - ($250,000.00): Continuation of the Homeowner Rehab program to provide lower income homeowners, especially senior citizens and disable persons, with safe and decent housing. (CDBG funds).
AP-60 Public Housing – 91.220(h)

Introduction

The Montgomery County Housing Authority’s (MCHA) portfolio consists of 600 public housing units located across eight properties within five of the County’s sixty-two municipalities. Four properties are mid or high-rise buildings, designed for elderly and disabled residents and four are general occupancy communities comprised of twins and townhome units. Approximately 94% of the public housing units are occupied with an annual turnover rate of approximately 73 units.

As of July 2018, there are 563 occupied tenant households. Small households, with 2-4 members, comprise 169 of the occupied households. Of the occupied tenant households, 293 consist of a disabled member. Of the occupied tenant households, 228 include an elderly member. Non-White occupied households represent 236 tenant households and Hispanic households totaled 34.

The MCHA’s public housing wait list is currently accepting applicants. As of July 2018, there are a total of 8,635 applicant households on the Public Housing wait list.

In addition to public housing, the Authority administers the Housing Choice Voucher Program (HCVP) serving approximately 2,400 households as of July 2018. Of the total HCVP households, small households (2-4 members) comprised 1,179. HCVP households with a disabled member represented 910 households. Non-White households accounted for 1503 HCVP households. The waiting list for Housing Choice Vouchers has been closed since 2015. As of July 2018 there are a total of 564 applicants on the HCVP wait list.

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

The County has awarded $50,000 in CDBG funds to the Montgomery County Housing Authority for removing and replacing a deteriorating oil fed emergency generator with a new gas fired generator at Sidney Pollock House.

The MCHA plans to apply for additional HOME/CDBG and/or AHTF to support capital improvements on the other properties within its portfolio.

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

Housing Choice Voucher Actions.

MCHA administers the Family Self-Sufficiency Program, a HUD program that encourages communities to develop local strategies to help Housing Choice Voucher households obtain employment and work toward economic independence and self-sufficiency. MCHA works with welfare agencies, schools,
businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a sustainable wage. Currently, there are 36 households enrolled in this program.

Since 1995, the MCHA has administered various programs to facilitate qualified households and HCVP households to achieve homeownership; to date, 87 households have secured homeownership.

**Public Housing Actions.**

Each MCHA public housing community has a *Resident Council*. The resident councils have input and involvement in management operations, modernization needs and recreation programs. The resident councils attend a regular MCHA Resident Advisory Board meeting and are in consulted in the planning processes for both the Five-Year and the annual Public Housing Authority (PHA) plans that are submitted to HUD.

The MCHA is the recipient of a HUD grant to fund a *Resident Opportunities (ROSS) Service Coordinator* who will work directly with public housing residents to assess their needs and link them to supportive services that:  
a) enable residents to increase income;  
b) reduce or eliminate need for welfare assistance;  
c) make progress toward housing self-sufficiency;  
d) link elderly and disabled to supportive services that enable them to age/remain in place avoiding more costly forms of care. The program will commence upon the hiring of a ROSS Coordinator slated for the third quarter of 2017.

**Priority Development Initiatives.**

The MCHA, with its development partner, is currently repositioning/ re-developing both Crest Manor and North Hills Manor. Construction has commenced at Crest Manor and financial closing is being scheduled for North Hills Manor. MCHA engaged in intensive resident and community outreach, coordination and communication involving the resident councils, resident households and neighbors in the redevelopment process. Additionally, residents have been offered free financial literacy classes and counselling, and have been provided individualized support as needed during the transition.

**Operational Procedures.**

MCHA strives to maintain a high quality living environment for its residents and clients. MCHA uses the following guides to implement its management and maintenance policies:

- Admissions and Continued Occupancy Handbook;
- PH Maintenance Plan Document;
- FSS Action Plan;
- Public Housing Assessment System Manual;
- Section 8 Administrative Plan;
• Housing Inspection Manual;
• Section 8 and Voucher Program Master Book; and
• HUD Handbook 7420.7

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

Not Applicable

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

Introduction

In January 2014, Your Way Home Montgomery County (YWH) was established as the county’s unified and coordinated housing crisis response system for families and individuals experiencing homelessness or at imminent risk of homelessness. Your Way Home embraces a “housing first” approach to ending homelessness by first helping people find or maintain stable permanent housing and then connecting them with the community, health, human, and financial services they need to prevent future experiences of homelessness. Through coordinated entry and assessment, Your Way Home prioritizes housing and services based on vulnerability and need rather than on a first come, first serve basis.

The major components of Your Way Home Montgomery County include; Coordinated entry through the Your Way Home Call Center and Street Outreach Team; Coordinated screening and assessment using the Service Prioritization and Decision Assistance Tool (SPDAT) and a Community Queue to prioritize households for housing and services based on vulnerability and severity of need.

Through the YWH community queue, individuals and families prioritized for shelter are referred to YWH participating emergency shelters and are then referred to one of three YWH Housing Resource Centers (HRC’s) located within the CoC for diversion or housing counseling services, Rapid Rehousing, or referral to Permanent Supportive Housing depending on the level and severity of their needs. Families and individuals are also referred or connected to mainstream and community resources, including child care, food security, physical, mental and behavioral health, employment and job training, public benefits access and veterans’ services, among others.

Your Way Home funders, service providers, landlords and community partners share a common agenda to improve the housing stability, economic security and health of people experiencing, or at imminent risk of homelessness. The collective vision of YWH is to make the experience of homelessness rare, brief and non-recurring.

An internal YWH Operations Team consisting of the Program Office Administrator, the Senior Manager, the Program Manager, the HMIS Data Manager, and the Community Relations Manager, as well as the CoC Consultant, oversee the overall operations of YWH. The Program Manager is charged with the day-to-day operations of the unified coordinated YWH housing crisis response system.

The ultimate goal of Your Way Home is to achieve a “functional zero” for housing and services—meaning the county’s capacity to meet the needs of people experiencing homelessness exceeds the demand at any given time.

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

Montgomery County will continue to work through the established YWH coordinated housing crisis response system to further reduce homelessness within the jurisdiction. In the last 3 years, since the launch of YWH in 2014, the county has reduced homelessness by 33%, measured through the Annual Point-In-Time Homeless (PIT) count conducted each year in January.

This year, the County is utilizing a combination of funding resources; including Continuum of Care (CoC), Emergency Solutions Grant (ESG) and the local Affordable Housing Trust Fund (AHTF) to fund the following programs to continue working towards its goal of reducing homelessness and attaining “functional zero”:

· **YWH Call Center** – this is a Toll-Free number for persons experiencing homelessness or at-risk of homelessness to call between the hours of 8:00AM to 8:00PM. Callers receive an assessment using the Service Prioritization and Decision Assistance Tool (SPDAT) and are then referred to appropriate services through placement on the Community Queue to prioritize households for housing and services based on vulnerability and severity of need. The YWH Call Center is expected to assess over 2,000 households this year.

· **Street Outreach** – Access Services working in coordination with Mobile Crisis will provide comprehensive street outreach services to all unsheltered persons experiencing street homelessness. Access services are expected to reach about 300 households reporting street homelessness this year.

· **Three Housing Resource Centers (HRC’s)** are funded to provide Rapid Rehousing and housing relocation and stabilization services to homeless households. Diversion housing counseling services are also provided to persons who are doubled-up and at-risk of homelessness. The three HRC’s are:

  - The Norristown HRC—operated through Carson Valley Children’s Aid (CVCA). This HRC primarily serves the Norristown Area and surrounding communities.
  - The Pottstown HRC—operated through the Pottstown Cluster of Religious Communities (PCRC). This HRC primarily serves the Pottstown Area and surrounding communities.
  - The North-Penn Area HRC—operated through Keystone Opportunity Center (KOC). This HRC primarily serves the North-Penn, Lansdale area and surrounding communities.

The 3 HRC’s are expected to provide services to about 1,200 persons this year.

Addressing the emergency shelter and transitional housing needs of homeless persons

This year, the county is utilizing a combination of CDBG, ESG, HOME, CoC and HAP dollars to provide funding for the following emergency shelters and transitional housing programs:
• **Interfaith Housing Alliance Ambler:** Emergency Shelter Program—Essential services for families experiencing homelessness. This shelter is expected to serve about 64 persons this year.

• **Keystone Opportunity Center:** Emergency Shelter Day Program—Essential services for families experiencing homelessness. This shelter program is expected to serve about 40 persons this year.

• **Laurel House Emergency Shelter:** Shelter Operations for emergency shelter serving victims of domestic abuse. This shelter is expected to serve about 150 persons this year.

• **Resources for Human Development, Coordinated Homeless Outreach Center (RHD-CHOC):** Shelter Operations and Food Costs. This emergency shelter serves single individuals and is expected to serve about 390 individuals this year.

• **The Salvation Army Norristown Family Shelter:** Shelter Operations. This shelter serves families experiencing homelessness and is expected to serve about 265 persons this year.

• **The Salvation Army Pottstown Family Shelter:** Shelter Operations. This shelter serves families experiencing homelessness and is expected to serve about 210 persons this year.

• **Family Services of Montgomery County:** Tenant Based Rental Assistance program for persons with HIV/AIDS. This 24-month transitional housing program funded through the HOME Program is expected to serve up to 5 households this year.

• **Hedwig House:** Tenant Based Rental Assistance program for extremely low income special needs households with mental disabilities. This 24-month transitional housing program funded through the HOME Program is expected to serve up to 15 households this year.

**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 vision of YWH is to make homelessness in Montgomery County rare, brief, and non-recurring. In the last year, YWH achieved the following:

- **Rare:** 86% of households (503 of 586) at risk of homelessness were diverted from entering an emergency shelter.
- **Brief:** The median length of stay in an emergency shelter was 56 days in 2016.
- **Non-recurring:** 86% of people who exited Rapid Re-Housing into permanent housing have not returned to homelessness within 2 years (276 of 320 people who exited to permanent housing over 2 years ago have not returned to homelessness).

These efforts will continue this year through the following programs:

- **Continuum of Care Matching funds from the AHTF to provide up to 20% of the Match funds**
required by CoC funded programs. The CoC competitive program funds a variety of homeless programs including Permanent Supportive Housing (PSH) units, Supportive Services, Planning, HMIS and Rapid Rehousing programs to reduce homelessness in Montgomery County.

- **YWH Call Center and Street Outreach Services**—the County will continue to support coordinated entry and assessment of persons experiencing homelessness using the SPDAT tool to prioritize households for housing and services based on vulnerability and severity of need.
- **Emergency shelters** will continue to be funded to provide shelter beds and connect clients to mainstream benefits.
- **Transition age youth and other youth between the ages of 18 to 24** will continue to receive either Rapid Rehousing or Transitional Housing though Valley Youth House. Valley Youth House is funded through the HOME program for a 24-month TBRA program for youth transitioning out of foster care and for Rapid Rehousing through CoC funding.
- **Two programs serving low income special needs populations with either mental disabilities or HIV/AIDS** will continue to receive Tenant Based Rental Assistance (TBRA) subsidy vouchers through the HOME program. These programs target special needs populations who are either at-risk of homelessness or literally homeless households.
- **Veterans in Montgomery County** are also eligible to receive assistance this year through the comprehensive Supportive Services to very low income Veterans and their families program (SSVF). The SSVF program is targeted to veterans who are currently experiencing homelessness or are at risk of losing their homes. Eligible veterans can also be referred to Rapid Rehousing provided through YWH Housing Resource Centers or the HUD-VASH program provided through the Montgomery County Housing Authority.
- **The County Office of Veterans Affairs** is also funded this year to provide outreach services to veterans experiencing homelessness and to connect these veterans to eligible benefits and services.

This year the county continues its efforts to promote and expand affordable housing units and encourage affordable housing developers to reserve some of these units for households experiencing homelessness. The following affordable housing developments are being funded this year utilizing either HOME or AHTF funding:

- **Advanced Living**: New Construction for a rental affordable housing development for families in the Lansdale, North Penn region.
- **Ingerman Group and Genesis Housing Corporation**: New Construction of 71 units of rental affordable housing family units located in East Greenville.

**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.

OHCD continues to work on discharge planning efforts with relevant publicly funded institutions and systems of care to help individuals and families avoid homelessness once they are discharged from institutions. These include discharge planning efforts with area hospitals and the county jail to provide information about YWH and access to the system.

This year, a 25-member YWH Advisory Council was formed and includes the CEO of Suburban Community Hospital, as well as the Norristown Municipality Chief of Police. Having these council members participating in the YWH Advisory Council expands the discharge planning efforts of the county. Additionally, discharge planning efforts will continue this year in coordination with the County Office of Mental Health, the Office of Aging and Adult Services, the Office of Children and Youth and Community Connections. These coordination efforts strive to ensure that households from institutions are not discharged into homelessness.

The following agencies are also funded this year through Homeless Assistance Program (HAP) funds or the Affordable Housing Trust Fund (AHTF) to assist low income households reach self-sufficiency and/or avoid homelessness:

- **Legal Aid of South Eastern Pennsylvania (LASP):** will provide legal services to low income persons facing eviction or other housing related legal issues that destabilize access to decent affordable housing. LASP is expected to assist over 2,500 households experiencing housing related legal issues this year.

- **Montgomery County Public Defender Office:** the public defender office has recently added a social work division and developed a prison liaison program with the goal of representing the constitutional rights of indigent individuals and providing advocacy on their behalf. This year the public defender social work division is expected to serve about 120 clients.

- **VNA Community Services:** is funded this year to support the staff costs for the SOAR (SSI/SSDI, Outreach, Access and Recovery) program for clients referred by Your Way Home Housing Resources Centers. SOAR targets clients with significant mental and physical barriers to permanent housing stability. The VNA's Benefits Specialists meet with clients and assist them in the benefits application process as well as monitor the progress of these applications. The SOAR program is an expedited SSI/SSDI access program that gets these benefits approved for clients in less than 60 days. This year, VNA expects to get about 20 YWH clients approved for SSI or SSDI utilizing the SOAR program.

- **Financial Literacy Services:** This year, through a Request for Proposal (RFP) process, OHCD hopes to expand its current first-time homebuyers counseling program to include a more holistic financial literacy program offered to variety of low income populations receiving services through various Health and Human Services program offices.
Finally, OHCD will also continue its partnership with the County Department of Commerce and Workforce Development to provide access to jobs and a variety of job training opportunities for YWH clients.

Discussion

All efforts to end homelessness in Montgomery County are implemented and coordinated through the Your Way Home Montgomery County Public-Private Partnership. Informed by the collective impact model of solving complex and deeply rooted social problems, Your Way Home Montgomery County is a cross-sector collaboration between county agencies, nonprofit service providers, philanthropic foundations, landlords, faith organizations, homeless advocates, consumers and other community partners committed to ending and preventing homelessness in Montgomery County.

Major components of the Your Way Home Public-Private Partnership include:

- A Your Way Home Advisory Council comprised of representatives from government, nonprofit, philanthropic, business and community leaders who provide guidance and support for Your Way Home’s vision and strategic direction.
- Your Way Home Action Teams which provide cross-sector experience and data-driven recommendations to improve the YWH system and provider performance.
- The Your Way Home Initiative Fund which provides flexible private funding for YWH housing stability coaches, housing locators and housing counselors to quickly and effectively help families and individuals exit from homelessness to permanent housing after all public and community resources have been exhausted.
- The Your Way Home Operations Team: a core staff team from the Office of Housing & Community Development working in coordination with all YWH partners to ensure smooth day-to-day behind the scenes operations.

HOPWA:

HOPWA Funds in Montgomery County are utilized by Family Services of Montgomery County through HOPWA grant funds from the City of Philadelphia. For fiscal year 2018-2019 (July to June)—Family Services has been awarded $85,000.
AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

A lack of quality affordable housing places housing cost burdens on low- to moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The housing efforts of the County are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability. Housing rehabilitation helps lower-income owners make much-needed repairs, which enables them to remain in their affordable homes, while the rental rehabilitation allows landlords to maintain decent housing and pass savings along to renters. Over the five-year period of the Consolidated Plan, Montgomery County will also work closely with agencies that provide expanded housing options to current and potential residents. These agencies include CHDOs and development corporations, both of which can assist many lower-income renters, including those with special needs. Revitalization efforts will continue to enhance the viability of neighborhoods through important street, sidewalk and other infrastructure projects.

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

A lack of quality affordable housing places housing cost burdens on low- to moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The housing efforts of the County are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability. Housing rehabilitation helps lower-income owners make much-needed repairs, which enables them to remain in their affordable homes, while the rental rehabilitation allows landlords to maintain decent housing and pass savings along to renters. Over the one year period of the Annual Action Plan, Montgomery County will work closely with agencies that provide expanded housing options to current and potential residents. These agencies include CHDOs and development corporations, both of which can assist many lower-income renters, including those with special needs. Revitalization efforts will continue to enhance the viability of neighborhoods through important street, sidewalk and other infrastructure projects.

In FY 2018, the County will provide funds to first-time homebuyers, existing homeowners, low income renters, and developers seeking to build affordable rental housing. These activities support housing choice by broadening the base of affordable housing units.

Because of its strategic location within the region, adjoining Philadelphia and convenient to transportation and jobs, the communities in Montgomery County are highly desirable. Much of the County is largely developed and there is limited land suitable for the development of housing. Demand for housing remains high. High demand in combination with a fixed supply of units and decreasing
suitable land results in continuing upward pressure on the price of housing in the County.

*Continued below in Discussion Section*

**Discussion:**

Within this context, the County’s latest Comprehensive Plan notes the following obstacles to finding affordable housing:

**Market obstacles:**

Demand for housing in the County remains high, which translates to a limited supply and rising costs. The Delaware Valley Regional Planning Commission reported that owner units rarely turn over in the more affordable communities in the County’s predominantly rural western half.

**Regulatory obstacles:**

These factors affect the supply of affordable housing in Montgomery County:

- A shortage of land zoned for townhouses, duplexes, mobile homes, apartments and small-lot singles or a mix of housing types
- Land zoned for office parks that fail to permit mixed uses with medium and high-density residential uses
- Too much land zoned for industrial uses
- Minimum lot sizes that often start at one-half acre or more, which usually makes the construction of smaller single-family homes financially unfeasible due to the high land costs incurred by developers
- Where there is enough land zoned for residential uses and public sewer service is available, high tap-in fees may increase the cost of the home beyond affordability.

**Financial obstacles:**

Among households, the problems commonly cited in failing to locate affordable housing include a lack of savings for down payment and closing costs or a security deposit and high household debt. Another financial obstacle is developers who prefer to build expensive homes rather than more affordable homes due to higher profits.

**Social obstacles**

In Montgomery County, these include the perception that affordable housing is not necessary or desirable in some communities. NIMBYism (not in my back yard) has occasionally surfaced as an impediment to the production of affordable housing, particularly rental units.
The ability of the County to address these barriers is limited, as local governments ultimately have the authority to develop and enforce their land use and housing development regulations. County comprehensive plans in Pennsylvania are advisory only. The County does not charge impact fees, request set-asides, require referendums nor any other process or policy that increases the cost of the construction of housing.

To overcome obstacles to the development of affordable housing, Montgomery County will continue to provide funds to development entities to expand the supply. Additionally, the County’s housing rehabilitation activities help to lower the cost of decent housing for lower income residents. Tenant-based rental assistance will be provided to disabled and elderly residents who find housing costs to be beyond their means.

In addition, funding is provided to municipalities to expand and improve infrastructure. The existence of adequate infrastructure is a pre-requisite for development of housing at any density. Increasing housing density and decreasing the footprint of each living unit results in increased affordability.

*Additional Narrative on Affirmatively Furthering Fair Housing is included in the Grantee Unique Appendices*
Introduction:

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

Actions planned to address obstacles to meeting underserved needs

The Five-Year Strategic Plan identified the following obstacles to meeting underserved needs for community development activities:

- Limited resources, insufficient professional resources
- Increasing costs to complete projects
- Fragmented approach to local planning and lack of coordination in addressing infrastructure needs
- Lack of inter-municipal communication in addressing public facility needs
- The legal requirements to acquire and demolish/rehabilitate abandoned buildings is prohibitively complex and expensive

Unfortunately, community development funds can do little to address many of these persistent problems. However, the County’s efforts to increase coordination of local municipal leaders have resulted in some joint planning and purchasing. Increasing communication will result in better government and a more efficient delivery of municipal services.

As demonstrated in the preceding sections, the County administers and supports a wide array of programs to expand housing choice and provide shelter and services. The Urban County’s FY 2018 allocations address obstacles of affordability and availability of housing and homeownership financing, opening more opportunities for lower-income households. However, obstacles such as the high cost of housing in Montgomery County being prohibitive to a large number of working poor families will remain due to the scale of these problems and the limited resources available for their resolution.

Actions planned to foster and maintain affordable housing

Obstacles to meeting the affordable housing needs of the community include:

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. Montgomery County partners with public agencies and nonprofit organizations, to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting underserved needs include:
• Increased need for affordable housing and supportive services resulting from economic downturn – while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and

• Increased foreclosures & unemployment – in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure rate, the associated problem of poor credit, and rising unemployment; and

• Lack of decent affordable housing units on the market - Montgomery County does have housing units presently listed for sale that are at an affordable price. However, many low cost units do not meet the “property standards” (§92.251) and are often listed as being sold “as-is”. Low cost “as-is” units restrict the actual number of affordable listings available to our low income residents. Conventional mortgages on substandard units are not an option which drives the market to investors who fill flip the units at a higher sale price.

As evidenced in the preceding sections, the county is funding a significant number of programs to expand housing choices and provide shelter and services. Emphasis has been placed on homeless prevention as well. The funds allocated by Montgomery County for FY 2018 address obstacles of affordability and availability of housing and homeownership financing. By providing funding for a number of housing activities, an expanded housing choice is available to lower income residents.

It is understood the obstacles such as the cost of housing being out of reach for a large number of working poor families will remain due to the scale of the problem and the limited resources available to address these problems.

**Actions planned to reduce lead-based paint hazards**

Lead-based paint hazard reduction has been integrated into the County’s housing policies and programs. In addition, the EPA guidelines for Renovation, Repair, and Painting effective in 2010 have also been incorporated. The lead guidelines require that:

1. The guidelines for the Housing Rehabilitation Program comply with the lead-based paint hazards at 24 CFR Part 35.

2. When paint is disturbed in the course of non-emergency rehabilitation work in properties constructed prior to January 1, 1978, only a qualified contractor will be permitted to perform lead hazard reduction activities. The contractor must employ a certified lead-based paint abatement supervisor, or have employees certified in lead-based paint abatement. Certified testing companies perform a pre-rehabilitation risk assessment for lead-based paint hazards and a post-rehabilitation clearance test for lead dust hazards where the non-emergency work disturbs a painted surface. Contractors trained in Lead Safe Work practices may be employed on projects costing less than $25,000.

3. Where emergency work is completed, to the maximum extent practicable, occupants must be protected from exposure to lead in the dust and debris that is generated.
4. Lead paint hazard reduction is an eligible rehabilitation activity that can be funded by the Housing Rehabilitation Program.

5. Households participating in the County’s First-Time Homebuyers Program and other County programs that provide assistance for home ownership are prohibited from purchasing housing units that have deteriorated interior or exterior painted surfaces. An exception to this requirement is made where minimal deteriorated painted surfaces exist and the seller is willing to have the surfaces tested, at their expense, by certified lead-based paint inspectors or risk assessors to determine if the deteriorated paint contains lead. If the paint contains lead, the household is not permitted to purchase the property and the agreement of sale becomes null and void. If the testing indicates that there is no lead-based paint present in the property, then the household can purchase the property provided that all deteriorated painted surfaces and any other Housing Quality Standards violations are corrected prior to settlement.

6. Units that are rented to households with young children (under age 6) receiving rent assistance through the County’s HESG Rapid-Rehousing funds or County TBRA funds will be inspected for deteriorated interior or exterior painted surfaces. Units with defective paint are not eligible for rent assistance unless the paint can be shown to be lead-safe.

7. Emergency shelters for the homeless will be required to inspect their shelters and report on the presence of lead-based paint, or exemption status for lead-based paint testing, at the time of submitting an application for County CDBG or ESG funding support. Inspections must be in accordance with the Montgomery County Emergency Shelters Minimum Habitability Standards and Lead-Based Paint Requirements: Policy and Procedures.

The minimum habitability standards for emergency shelters promote safety, sanitation, and privacy for all persons living in emergency shelters. Therefore, all Montgomery County Emergency Shelters applying for Shelter Operations or Shelter Renovation funding from the Montgomery County Office of Housing & Community Development will need to demonstrate compliance with the minimum habitability Standards for emergency shelters established by HUD at 24 CFR 576.403 and 24 CFR 500(j) and Lead-Based Requirements for Emergency Shelters at 24 CFR 576.403(a), or demonstrate exemption from Lead-Based Paint requirements established at 24 CFR 35.115.

CONTINUED IN DISCUSSION SECTION

Actions planned to reduce the number of poverty-level families

Poverty is a function of income, which is related to education, job training and employment. Montgomery County remains committed to addressing the needs of its citizens who live at or below the poverty level. It is also recognized that the presence of poverty and the related social and economic problems are a destabilizing element in some neighborhoods.

In Montgomery County, Community Action Development Commission (CADC N) is the official anti-
poverty agency. CADCOM provides rent assistance, utility assistance, case management and counseling services to assist with financial management and benefit entitlement assistance, as well as connection to home weatherization services to reduce utility costs. CADCOM is the lead agency for many services provided in the county, including USDA Food distribution to food cupboards and pantries countywide, Individual Development Accounts (IDA) for home ownership or higher education, and the Volunteer Income Tax Assistance (VITA) program. CADCOM flexible funding provides varied programs based on community needs that empower low-income households, assisting them to develop skills for independent living.

Another community program that Montgomery County partners with is Pottstown Cluster of Religious Community’s Bridges out of Poverty program. This educational program works with Montgomery County residents experiencing poverty by providing instruction and support for households to strengthen educational attainment and job skills, improve on-the-job productivity, and understand household budgeting and finance.

Your Way Home, Montgomery County’s coordinated housing crisis response program, partners with Clarifi Financial Counseling services to provide one-on-one budgeting counseling, debt consolidation, student loan consolidation, and credit repair services for low-income individuals. This financial counseling service, made possible through Your Way Home’s public-private partnership, helps households who have recently exited homelessness to a permanent housing destination through the Rapid Re-Housing program create financial goals and budgets for themselves that will help increase their economic and housing security.

Additionally, Montgomery County has funded the SSI/SSDI Outreach, Access, and Recovery (SOAR) program through our Homeless Assistance Program (HAP) grant. SOAR is a program designed to increase access to SSI/SSDI for eligible adults who are experiencing or at risk of homelessness and have a mental illness, medical impairment, and/or a co-occurring substance use disorder. SOAR-trained case managers connect with households in Montgomery County experiencing homelessness and connect them to social security disability benefits and income to help increase their economic stability, while the Your Way Home program works with these households to connect them to housing.

The Montgomery County Department of Commerce and Economic Development (CED) offers start-up and business planning assistance, marketing existing financial assistance programs, and relocation assistance.

Montgomery County Industrial Development Authority (MCIDA) is also governed by a Board of Directors appointed by the County Commissioners. As an authority, MCIDA is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.

PA CareerLink® Montgomery County offers services to job seekers that include an extensive resource area, career coaching, ongoing recruitment events, career readiness workshops, skills and interests
assessments, and computer skill-building classes. Eligible CareerLink® customers may also benefit from skills training or on-the-job training programs. Considered a one-stop location for all your employment needs, CareerLink® offers much more than searching for jobs online.

**Actions planned to develop institutional structure**

The Administrator of the Montgomery County Office of Housing and Community Development oversees the administration of all CDBG, HOME, and ESG entitlement programs in addition to the Affordable Housing Trust Fund and the Pennsylvania Housing Assistance Program. The Office of Housing and Community Development also applies for and administers other funding sources, ensuring all resources are highly integrated and administered efficiently. The Office of Housing and Community Development is responsible for the following:

- Program management, monitoring, and oversight
- Inter Department/Agency Coordination
- Sub-recipient contract administration and monitoring
- Program evaluation
- Report preparation and submission
- Public education and participation
- Special project development
- Consolidated Plan preparation, monitoring, and evaluation
- Housing & Homeless programs

The daily oversight of activities for all programs and initiatives comes under the Deputy and the Senior Manager of Housing and Homeless Services. In addition to community development and housing support, County staff provides assistance to sub-recipients of grants and loans. The sub-recipient grants and loans include, but are not limited to, Community Development Block Grants (CDBG), Stewart B. McKinney Act funds, HOME, Pennsylvania Department of Community and Economic Development funds, and Pennsylvania Housing Finance Authority (PHFA) loans, among others.

Other County agencies that participate with housing, community development, and economic development in Montgomery County are as follows:
- Montgomery County Planning Commission (MCPC) is an advisory body on land use, transportation of all types, the environment, water and sewer service, parks and open space, farmland preservation, storm water management, site design, housing, zoning, development patterns and demographic trends in the county. MCPC serves as staff to the County’s Commissioners on the above planning issues. MCPC is responsible for the Comprehensive Plan. MCPC conducts reviews of local zoning and land development ordinances to ensure conformance and consistency with the Comprehensive Plan. MCPC provides support to the 62 municipal governments through various services and technical assistance.
- The Redevelopment Authority of Montgomery County carries out urban renewal including blight clearance, selling improved land for economically and socially desirable development in accordance with...
officially approved plans, and providing affordable housing programs.

- The Your Way Home Advisory Council provides high level policy, practice and funding guidance on the vision and strategies of Your Way Home’s housing crisis response system and public-private partnership. This advisory council provides cross-sector support and investment towards the common agenda to end homelessness in Montgomery County. The council has 23 members representing multiple systems and sectors including local municipalities, Montgomery County Community College, Montgomery County Department of Commerce, Montgomery County Housing Department, philanthropic foundations, a Regional Health Center, Montgomery County Health and Human Services, and the Montgomery County Intermediate Unit, among others.

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

The Office of Housing and Community Development is responsible for the coordination of the various planning activities and implementation of programs. Coordination and cooperation continues to be one of the most important elements in the implementation of the Five-Year Housing and Community Development Strategy. To ensure that service delivery coordination is continued, it is essential that each agency share data, exchange information, and consult and coordinate with each of the other service providers. The County’s primary means of connecting and networking with housing and service providers in the region is as follows:

The County initiated the Your Way Home program in 2014 to implement and coordinate all homeless and housing services throughout Montgomery County. Your Way Home consists of a coordinated entry system, with one toll-free number for any Montgomery County resident experiencing a housing crisis to call. All callers receive a coordinated screening and assessment to connect them to emergency shelter and appropriate housing services (including Rapid Re-Housing or Permanent Supportive Housing). Over 30 housing & homeless non-profit providers participate in Montgomery County’s Homeless Management Information System (HMIS), which results on increased collaboration, the sharing of data, and working towards common outcomes. Additionally, Your Way Home has published the Your Way Home Operations Manual, outlining all policies and procedures related to the continuum of homeless and housing services within Montgomery County. All contracted housing and homeless non-profit providers are required to follow Your Way Home policies and procedures. Through this coordinated, public-private partnership, Your Way Home has reduced homelessness in Montgomery County by 33%.

Additionally, the County provides strong leadership and planning to coordinate activities and functions and facilitate communication between County departments and their staffs. Through public meetings and hearings on projects and applications for funding, Montgomery County will continue to provide a forum where private and public entities can discuss community development, housing, and other issues. The County will consider its activities in relation to Federal and State agencies to ensure that all-available programs are considered. Montgomery County will consider opportunities to work with the municipalities and local non-profit agencies to coordinate efforts to provide necessary services. These
coordinated efforts will provide affordable housing opportunities to low-income persons.

**Discussion:**

**MONTGOMERY COUNTY HEALTH DEPARTMENT - LEAD PROGRAM**

The Montgomery County Health Department recommends universal screening for lead poisoning, for all children at age one and two, regardless of their risk. Lead Poisoning is a reportable disease in the state of Pennsylvania, and physicians are required to report all blood lead results – no matter what level of blood lead is found – to the Montgomery County Health Department. The Centers for Disease Control and Prevention (CDC) has recently updated its recommendations on children’s blood lead levels. By shifting the focus to primary prevention of lead exposure and other hazards in the home that can contribute to injury or illness, we can reduce or eliminate dangerous risks in children’s environments BEFORE they occur.

Lead case management services are provided to all Montgomery County residents who have a child, age 6 years and younger, who has been identified as having an elevated blood lead level. Case management services involve education and home visits by an Environmental Health Specialist and/or a Public Health Nurse. They work together to assist parents and homeowners in reducing and/or eliminating the source of lead exposure to the child.
Program Specific Requirements

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

Introduction:

Projects planned with all CDBG, ESG, and HOME funds expected to be available during the year are identified in the projects table. The executive summary includes the objectives and outcomes identified in the plan as well as an evaluation of past performance, and a summary of the citizen participation and consultation process.

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.
3. The amount of surplus funds from urban renewal settlements
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
5. The amount of income from float-funded activities

Total Program Income: 0

Other CDBG Requirements

1. The amount of urgent need activities

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.

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

Annual Action Plan
2018

75

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

The HOME funds that the County utilizes and the form of investment conform to 92.205(b). The County does not utilize forms of assistance not specified in 92.205(b).
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:

Montgomery County uses HOME funds for three types of homebuyer activities. They are:

1) downpayment program, which provides loans of up to $10,000 to help with down payments and closing costs, and

2) new construction program, which provides direct buyer subsidy for houses constructed or rehabbed, in whole or in part, with HOME funds, generally built or rehabbed by the County’s non-profit partners, both CHDO and non-CHDO alike and sold to a HOME-eligible household.

3) Acquisition/Rehab/Resale program, which provides funding to the CHDO to acquire and rehabilitate a sub-standard unit to be sold to a HOME-eligible household.

Montgomery County has chosen to use the Recapture option for all programs. The HOME program’s investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to the County should the property be sold during the period of affordability.

**For the new construction program**, repayments are in the amount of the direct homebuyer subsidy pro-rated over the period of affordability and subject to availability of net proceeds. The direct subsidy is the amount of HOME funds used to reduce or help reduce the sales price from market value to an amount affordable to the buyer. The recapture amount is calculated using the following formula:

\[
\text{HOME direct subsidy/Period of affordability} \times \text{Years remaining in period of affordability} = \text{Recapture Amount}
\]

**For the downpayment assistance program**, all HOME funds are considered the direct subsidy and repayment is in full, subject to the availability of net proceeds.

In the event that net proceeds – defined as sales price less other debt on the property – are insufficient to repay the entire recapture amount, the amount to be recaptured shall be determined by the following formulas:

For the downpayment program: \( \text{HOME direct subsidy/Total project cost} \times \text{net proceeds} = \text{Adjusted Recapture Amount} \).
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The HOME program’s investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to the County should the property be sold during the period of affordability.

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 County will not be using any HOME funds to refinance debt secured by multifamily housing that is being rehabbed with HOME funds.

**Emergency Solutions Grant (ESG)**

**Reference 91.220(I)(4)**

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

The County of Montgomery's written standards for providing ESG assistance are included as in the Application attachment in the Grantee Unique Appendices.

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

The CoC has established a coordinated entry system called Your Way Home. Your Way Home includes a single, toll-free Call Center that provides all initial screening and assessment for any Montgomery County resident experiencing a housing crisis. The Call Center utilizes the evidence-based assessment tool called the Vulnerability Index- Service Prioritization and Decision Assistance Tool (VI-SPDAT). Persons are triaged for entry into emergency shelter based on (1) living in a place not meant for human habitation, and (2) highest vulnerability as indicated by the VI-SPDAT. When a shelter has an opening, they take the top referral from the list provided by the Call Center. Households experiencing homelessness are simultaneously triaged for permanent housing programs based on their level of vulnerability (including Rapid Re-Housing and Permanent Supportive Housing programs). Your Way Home operates 3 regional Housing Resource Centers which provide the rapid re-housing program for all persons in shelter or otherwise living in a place not meant for human habitation in Montgomery County. Households are enrolled in rapid re-housing for up to 24 months with decreasing rental subsidy as appropriate. Your Way Home also has a Permanent Supportive Housing Prioritization Policy in place to prioritize persons who are chronically homeless and disabled. All PSH providers have agreed to accept PSH referrals based on the recommendation of the policy. Lastly, Your Way Home launched a Diversion program in January 2015 to provide limited
assistance to persons requesting emergency shelter placement who are not living on the street in order to provide alternative resources to prevent households from becoming homeless when possible.

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

The County of Montgomery’s written standards for the application and allocation process are included in the Application attachment in the Citizen Participation Appendix. The County of Montgomery, through its Office of Housing and Community Development, announces the availability of Community Development Block Grant Program (CDBG) funds, HOME funds, and ESG funds. Funds are awarded through an application process. Applications for funding can be submitted by: 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) Homeless Shelters and 5) private developers.

The County Housing and Community Development staff reviews each project proposal as it relates to federal and county eligibility criteria and fundability criteria. Prior to the actual review process a preliminary screening of the application will take place testing for completeness. Staff will assess how the application will meet the goals of the County’s Five- Year Consolidated Plan and how the project will accomplish those goals. Additionally, staff will assess the program’s outcomes (if applicable) and compliance with coordinated Your Way Home policies and procedures (if applicable). Upon selection, all recipients will be notified of the grant amount after October 1, 2015 following federal acceptance. All program participants will be required to execute a Subrecipient Agreement with Montgomery County. Specific instructions on how to begin implementation of the project will be given at an orientation meeting prior to the start of the project. No costs incurred prior to the execution of the Grant Agreement and Notice of Environmental clearance will be reimbursed by the County Community Development Program. Any costs incurred and paid for prior to proper notification of clearance can jeopardize the use of funds on the project.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Montgomery County Department of Housing is the CoC Lead Agency for PA-504/Montgomery County/ Lower Merion/ Norristown/ Abington continuum of care. Our CoC Governance Board, which is 13 members and elected on 2 year terms, has a reserved membership slot for a homeless or formerly homeless individual. Currently this position is filled by a formerly homeless veteran.

5. Describe performance standards for evaluating ESG.

The evaluation of ESG applications is consistent with the evaluations of all applicants for the

Annual Action Plan 2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
County’s Consolidated Grants Program funds (CDBG, ESG and HOME). A copy of these guidelines are included in the Grantee Unique Appendices

For the new construction program: HOME direct subsidy/Total project cost x Years remaining in period of affordability/period of affordability x net proceeds = Adjusted Recapture Amount.

For the acquisition/rehab/resale program:

Amount subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to purchase the dwelling unit. This includes any HOME assistance that reduced the purchase price from fair market value to an affordable price, but excludes the amount between the cost of producing the unit and the market value of the property (i.e., the development subsidy).
Section Two

2. Grantee Unique Appendices
Table of Contents

GRANTEE UNIQUE APPENDICES ATTACHMENTS

A – Affirmatively Furthering Fair Housing
B - 2018 Application and Application Instructions
C – 2018 Project Map
Affirmatively Furthering Fair Housing

Montgomery County initiated an update of its Analysis of Impediments to Fair Housing Choice (AI) during FY 2011 and completed additional review and updates during the preparation of the 2015-2019 Consolidated Plan. This document identifies policies and practices that potentially affect access to affordable housing protected classes under the Fair Housing Act. The County’s Fair Housing Action Plan, an element of this document, represents an effort to ensure that the County’s housing landscape is characterized by opportunity for all.

In FY 2018, the County plans to continue engaging the services of the Housing Equality Center (HEC -- formerly the Fair Housing Council of Suburban Philadelphia) to provide Fair Housing compliance training, technical assistance and publications to social service organizations, county agencies, municipalities, housing providers, housing developers and rental housing agencies that serve the protected classes. Also, we will be initiating the process of updating the analysis with technical assistance from consultants.

The impediments and recommended action steps included in the AI have identified the need for the County to address the following issues:

- There is a need for greater cooperation among HUD entitlement communities within Montgomery County to identify and address impediments to fair housing choice.

Other entitlement communities within the County include Abington, Lower Merion and Norristown. There are opportunities to create affordable housing outside of impacted areas both within the Urban County and within other entitlement communities in Montgomery County. However, the percentage of non-impact areas in the Urban County is much higher than in the other entitlement areas, which affords the County a wider range of options in locating affordable housing.

Despite HUD’s postponing the requirement of the AFH (Assessment of Fair Housing) analysis to replace the AI (Analysis of Impediments), our office’s implementation of affirmatively furthering fair housing will entail a collaborative approach to affordable housing for all Montgomery County residents wherever they choose to live. Such collaboration can address the de-concentration of poverty and segregated housing patterns where they now exist.

Local units of government that participate in the Urban County’s entitlement grant programs may not unequivocally understand their responsibility to affirmatively further fair housing choice.

- Some of the policy documents used by Montgomery County and the Montgomery County Housing Authority (MCHA) in the administration of housing programs could improve, from a fair housing perspective.
The Office of Housing and Community Development is reviewing the detailed Census data to determine the prevalence of persons with limited English proficiency being served by County programs in order to update a four-factor analysis to determine whether a Language Access Plan is warranted. Furthermore, our draft Language Assistance Plan (LAP Plan) has been submitted to HUD. Finally, our phone system now has dialogue / script that is available in Spanish.

Public transit is limited to the County’s most densely developed areas. Residents of rural townships in the northwest region are especially isolated from service, due to the financial infeasibility of extending routes to sparsely developed areas.

Seventeen of 62 municipalities in Montgomery County, all in the County’s more sparsely populated northwest region, do not receive regular service from a large, fixed-route transit provider. The lack of transit services in these communities presents a barrier to the development of affordable housing, as well as linking transit dependent residents to services.

- **Evidence demonstrates that some discrimination is present in the sale and rental of housing across Montgomery County, especially on the bases of race, disability and family status.**

Across Montgomery County, race and disability were the primary bases for fair housing complaints to both HUD and the PA Human Rights Commission, accounting for two-thirds of all fair housing complaints.

Montgomery County will continue to use its federal and local resources to expand housing choice by prioritizing housing investments in non-impacted areas of the county. Funds are still distributed to the two urban centers for the purposes of neighborhood revitalization, but by emphasizing affordable housing opportunities in other communities, the burden is lifted from the two urban centers.

The County affirmative marketing policy requires that staff members at rental sites assisted with CDBG, HOME or Affordable Housing Trust Fund receive on-site fair housing training. This is in addition to the fair housing and affirmative marketing materials that must be maintained and made available for review and training at such sites.

As part of the development of the Comprehensive Plan, the County Planning Commission reviewed all 62 municipal zoning ordinances within its jurisdiction to determine consistency with the Plan and with fair housing standards. The Commission sent information to each municipality on non-discriminatory zoning and land use practices and advice for reducing zoning barriers to the development of housing for members of the protected classes. The Housing Equality Center conducted follow up with communities. The County requires all municipalities applying for CDBG funds to attend a Fair Housing training annually.
The AI determined that the recommendations of the updated Comprehensive Plan are entirely consistent with fair housing standards. The Plan includes a focus on the expansion of housing affordable to workforce and low-income populations, recommendations to broaden the variety of housing types being created, strategies to ensure that special-needs households are adequately served and encouraged flexibility in municipal land use policies and practices. The plan considers housing within the framework of existing and developing employment centers and community types.

The Planning Commission conducted a study to determine the feasibility of extending public transit service to the northwest region of Montgomery County. The analysis involved an extensive outreach effort and needs assessment and ultimately resulted in the finding that transit routes through the County’s most sparsely developed municipalities were not economically feasible. The Planning Commission will continue to gauge the transportation needs of the County’s lower-income residents and connect them with employment and other opportunities to the maximum extent possible. The following transportation options are available to Montgomery County residents.

- Customized Community Transportation (CCT) provides paratransit service - CCT Connect - to individuals with disabilities and senior citizens.
- In accordance with the Americans with Disabilities Act (ADA), SEPTA provides comparable service for people with disabilities who are functionally unable to use regular accessible fixed-route bus service for some or all of their transportation needs. Eligible individuals can travel whenever and wherever buses operate in SEPTA’s five-county service region.
- The Shared-Ride program is a door-to-door, advance-reservation, ride-sharing service, offered on a space-available basis to senior citizens 65 years of age and residents of Philadelphia. This service can be used to travel within the City of Philadelphia and to any location in the surrounding counties within three miles of the City's border. The State of Pennsylvania Lottery Fund contributes to the cost of operating this program.
- Every day, hundreds depend on Suburban Transit Network, Inc. (Transnet), for convenient, low-cost transportation to school, medical appointments, camp, shopping centers, corporate campuses and more.

The County has the ability to deny CDBG and HOME funds to municipalities that engage in discriminatory zoning and land use practices. Should the Commission identify such discrimination, HEC has provided training to the elected officials in these localities. Any municipality that receives CDBG or HOME funding from the County must certify that it will affirmatively further fair housing and document the same.

The Office of Housing and Community Development screens all applicants for CDBG, HOME and ESG funds to ensure that they are in compliance with HUD’s requirement to affirmatively further fair housing. The County has the ability to deny funding to any developer who may be a party to an unresolved fair housing lawsuit or complaint.
The County has added a graphic button on its website to provide direct access to information on its commitment to affirmatively further fair housing. Clicking the button opens a slideshow that contains material on the County’s fair housing responsibilities, objectives and actions as well as explanation of fair housing laws.

In funding rounds for HOME and Affordable Housing Trust Fund projects, the County awards bonus points to projects that expand the availability of low-income family rental housing in non-impacted areas. The applications for these funding programs are very clear regarding the County’s preference for projects that advance fair housing choice.

The County’s housing programs continue to serve members of the protected classes through substantial investment in the expansion of the affordable and accessible housing stock. The Affordable Housing Trust fund has resulted in the investment of millions of dollars toward the development of a variety of housing options that serve members of the protected classes.

Finally, the County has initiated an Affordable Housing Strategic Planning process. This process will be inclusive of all stakeholder groups, including County residents, and informed by data. The Office of Housing and Community Development will serve as the planning project lead agency in collaboration with the Department of Commerce and the Planning Commission.

The affordable housing strategic planning process is led by an advisory council consisting of:

- The boards / councils of the Planning Commission, Commerce Department, and Your Way Home
- Montgomery County Housing Authority
- Municipalities
- Nonprofit housing developers, service providers and advocates
- Housing investors and finance agencies
- Landlords and property managers
- Transportation agencies
- School districts
- Residents

This process is intrinsically tied to affirmatively furthering fair housing because it will focus on access and inclusivity as it pertains to affordable housing.
SECTION I

GENERAL INTRODUCTION

A. The Application Concept

The County of Montgomery, through its Office of Housing and Community Development, is announcing the availability of Program Year 2018 Community Development Block Grant Program (CDBG). CDBG funds will be awarded through this application process.

The Non Housing Community Development Plan goals that are described in the 2015-2019 Consolidated Plan are as follows: improvement of public facilities; improve the existing infrastructures, specifically improvements to low income neighborhoods burdened with storm and sanitary sewer problems; establish a working relationship with social service agencies and to provide the necessary gap funding for the increasing service needs; the removal of architectural barriers which restrict the mobility and accessibility of elderly or handicapped persons; Historic Preservation; Economic Development and long range Planning. The provision of homeless assistance and supportive services to assist homeless individuals, homeless families and non-homeless persons with special needs to obtain and maintain self-sufficiency.

Montgomery County 2015-2019 Consolidated Plan can be accessed on the Housing and Community Development web site. The 2015-2019 Priority Needs are located on Table 48 pages 114 through 123.

Through the application process, Housing and Community Development is requesting all applicants to examine their approach to meeting the goals previously set in the Five-Year Strategy outlined in the 2015-2019 Consolidated Plan. Housing and Community Development encourages a comprehensive approach, which integrates all available resources. HUD entitlement Community Development Block Grant (CDBG) programs are excellent sources of flexible dollars to address locally identified needs.

B. The Application Process

Montgomery County’s Office of Housing and Community Development is responsible for administering the CDBG program in accordance with the requirements of the 1974 Housing and Community Development Act, as amended; (24 CFR Part 570.).

Applications for funding should be submitted by; 1) a unit of local government; 2) public agencies; 3) non-profit organizations; 4) private developers.

The following municipalities have elected not to participate in the County’s program and therefore projects that primarily serve these communities generally are not eligible:
C. Competitive Review Process

County Housing and Community Development staff will review each project proposal as it relates to federal and county eligibility criteria and national objective criteria. Prior to the actual review process a preliminary screening of the application will take place testing for completeness. Staff will assess how the application will meet the goals of the County’s Five-Year Consolidated Plan and how the project will accomplish those goals.

Upon selection, all recipients will be notified of the grant amount after October 1, 2018 following federal acceptance. All program participants will be required to execute a Subrecipient Agreement with Montgomery County. Specific instructions on how to begin implementation of the project will be given to you at an orientation meeting prior to the start of the project. No costs incurred prior to the execution of the Grant Agreement and Notice of Environmental clearance will be reimbursed by the County Community Development Program. Any costs incurred and paid for prior to proper notification of clearance can jeopardize the use of funds on the project.

Office of Housing and Community Development Floodplain Policy

The Office of Housing and Community Development will not fund new residential development in the identified 100-year floodplain. In accordance with Section 202 (a) of the Flood Disaster Protection Act of 1973, (42 U.S.C. 4106) no Federal officer or agency shall approve any financial assistance for acquisition or construction purposes (as defined under section 3(A) of said Act (42 U.S.C. 400(a)), one year after a community has been formally notified of its identification as a community containing an area of special flood hazard, for use in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, unless:

a. The Community in which the area is situated is participating in the National Flood Insurance Program, and

b. The subrecipient assures that flood insurance is obtained for all assisted housing units in the identified 100-year floodplain.
NATIONAL OBJECTIVES

Community Development Block Grant Program (CDBG)

The Community Development Block Grant program provides assistance for housing and community development activities. In order for a project to qualify for CDBG funding, it must meet at least one of the three statutory objectives of the 1974 Housing and Community Development Act, as amended. These objectives are as follows:

1. **Activities benefiting low- and moderate-income persons.** Activities meeting any one of the following criteria will be considered to benefit low and moderate income persons unless there is substantial evidence to the contrary:
   a. **Area benefit activities.** An activity, the benefits of which are available to all the residents in a particular area, where the proportion of low and moderate income persons in the area is within the highest quartile of all areas in the urban county’s jurisdiction in terms of the degree of concentration of such persons. In applying this provision, HUD has determined the lowest proportion Montgomery County may use to qualify an area for this purpose is 38.10%. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. The appropriateness and reasonableness of the service area should be based on the nature and magnitude of the activity. For purposes of determining qualification under this criterion, activities of the same type that serve different areas will be considered separately on the basis of their individual service area. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion. All applicants are advised to verify with the County’s Housing and Community Development staff that the proposed activity is located within a low and moderate income service area. (See Exhibit I at the end of this section for a discussion of service area.)

   Additional areas may qualify if an income survey is conducted and it demonstrates that 51% or more of the persons residing in the service area are low and moderate income. Instructions for the survey are available from the Montgomery County Department of Housing and Community Development. All income survey documentation must be completed and submitted with the application due by 4:15 p.m., Monday, April 16, 2018.

   b. **Limited clientele activities.** An activity which benefits a limited clientele, at least 51 percent of whom are low- or moderate-income persons. (The following kinds of activities may not qualify as benefit to limited clientele: activities, the benefits of which are available to all the residents of an area; activities involving the acquisition, construction or rehabilitation of property for housing; or activities where the benefit to low- and moderate-income persons to be considered is the creation or retention of jobs.) To qualify as a limited clientele benefit the activity must meet one of the following tests:
(i) Benefit a clientele who are generally presumed to be principally low and moderate income persons. Activities that exclusively serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons, 51 percent of whom are low- and moderate-income (See Table II-1 below for presumed income categories): abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of ``severely disabled,'' homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers; or (ii) Require information on family size and income so that it is evident that at least 51 percent of the clientele are persons whose family income does not exceed the low and moderate income limit (See Table II-2 below for income limits); or (iii) Have income eligibility requirements which limit the activity exclusively to low and moderate income persons; or (iv) Be of such nature and be in such location that it may be concluded that the activity's clientele will primarily be low and moderate income persons; or (v) An activity that serves to remove material or architectural barriers to the mobility or accessibility of elderly persons or of adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled" will be presumed to qualify under this criterion if it is restricted, to the extent practicable, to the removal of such barriers by assisting: (1) The reconstruction of a public facility or improvement, or portion thereof, that does not qualify as an area benefit activity; or (2) The rehabilitation of a privately owned nonresidential building or improvement that does not qualify as an area benefit activity or a job creation/retention activity; or (3) The rehabilitation of the common areas of a residential structure that contains more than one dwelling unit and that does not qualify as a low and moderate income housing activity. (vi) Where information on income by family size is required, the subrecipient may substitute evidence establishing that the person assisted qualifies under another program having income qualification criteria at least as restrictive as that used in the CDBG definition of "low and moderate income person" such as Job Training Partnership Act (JTPA) and welfare programs.

c. Housing activities. An eligible activity carried out for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by low- and moderate-income households. This would include, but not necessarily be limited to, the acquisition or rehabilitation of property; conversion of nonresidential structures; and new housing construction. Generally CDBG funds may only be used to undertake new housing construction:
   (i) as provided under the last resort housing provisions set forth in 24 CFR part 42;
   (ii) as authorized under Sec. 570.201(m) or (n); or
   (iii) when carried out by an entity pursuant to Sec. 570.204(a);

d. Job creation or retention activities. An activity designed to create or retain permanent jobs where at least 51 percent of the jobs, computed on a full time equivalent basis, involve the employment of low and moderate income persons.
2. **Activities which aid in the prevention or elimination of slums or blight.** Activities meeting one or more of the following criteria, in the absence of substantial evidence to the contrary, will be considered to aid in the prevention or elimination of slums or blight:

   a. **Activities to address slums or blight on an area basis.** An activity will be considered to address prevention or elimination of slums or blight in an area if:

      (i) The area, delineated by the subrecipient, meets a definition of a slum, blighted, deteriorated or deteriorating area under State law (P.L. 991) or local law;

      (ii) Throughout the area there is a substantial number (at least 25%) of deteriorated or deteriorating buildings, or the public improvements are in a general state of deterioration;

      (iii) Documentation is maintained by the subrecipient on the boundaries of the area and the conditions and standards used that qualified the area at the time of its designation; and

      (iv) The assisted activity addresses one or more of the conditions which contributed to the deterioration of the area. Rehabilitation of residential buildings carried out in an area meeting the above requirements will be considered to address the area's deterioration only where each such building rehabilitated is considered substandard under local definition before rehabilitation, and all deficiencies making a building substandard have

---

**Table II-1: CDBG Presumed Benefit Income Levels**

<table>
<thead>
<tr>
<th>Presumed Category</th>
<th>Beneficiary Income Level for Presumed Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abused children</td>
<td>Extremely low income</td>
</tr>
<tr>
<td>Battered spouses</td>
<td>Low income</td>
</tr>
<tr>
<td>Severely disabled adults</td>
<td>Low income</td>
</tr>
<tr>
<td>Homeless persons</td>
<td>Extremely low income</td>
</tr>
<tr>
<td>Illiterate adults</td>
<td>Low income</td>
</tr>
<tr>
<td>Persons with AIDS</td>
<td>Low income</td>
</tr>
<tr>
<td>Migrant farm workers</td>
<td>Low income</td>
</tr>
<tr>
<td>Elderly (senior center rehab or center based senior services)</td>
<td>Moderate income</td>
</tr>
<tr>
<td>Elderly (non-center based senior services)</td>
<td>Low income</td>
</tr>
</tbody>
</table>

**Table II-2: 2017 HUD Income Limits**

<table>
<thead>
<tr>
<th>Income</th>
<th>1 person</th>
<th>2 person</th>
<th>3 person</th>
<th>4 person</th>
<th>5 person</th>
<th>6 person</th>
<th>7 person</th>
<th>8 person</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low Income (30%)</td>
<td>$17,500.00</td>
<td>$20,000.00</td>
<td>$22,500.00</td>
<td>$24,950.00</td>
<td>$28,780.00</td>
<td>$32,960.00</td>
<td>$37,140.00</td>
<td>$41,320.00</td>
</tr>
<tr>
<td>Low Income (50%)</td>
<td>$29,150.00</td>
<td>$33,300.00</td>
<td>$37,450.00</td>
<td>$41,600.00</td>
<td>$44,950.00</td>
<td>$48,300.00</td>
<td>$51,600.00</td>
<td>$54,950.00</td>
</tr>
<tr>
<td>Moderate Income (80%)</td>
<td>$46,600.00</td>
<td>$53,250.00</td>
<td>$59,900.00</td>
<td>$66,550.00</td>
<td>$71,900.00</td>
<td>$77,200.00</td>
<td>$82,550.00</td>
<td>$87,850.00</td>
</tr>
</tbody>
</table>
been eliminated if less critical work on the building is undertaken. At a minimum, the local
definition for this purpose must be such that buildings that it would render substandard
would also fail to meet the housing quality standards for the Section 8 Housing
Assistance Payments Program-Existing Housing (24 CFR 882.109). The subrecipient
must include the following in its application for funding: (1) the local definition of
“substandard”; (2) a pre-rehabilitation inspection report describing the deficiencies in
each structure to be rehabilitated; and (3) details and scope of CDBG assisted
rehabilitation, by structure.

b. Activities to address slums or blight on a spot basis. Acquisition, clearance,
relocation, historic preservation, remediation of environmentally contaminated properties,
and rehabilitation of building and improvements which eliminate specific conditions of
blight, physical decay, or environmental contamination on a spot basis not located in a
slum or blighted area will meet this objective. Under this criterion, rehabilitation is limited
to the extent necessary to eliminate specific conditions detrimental to public health and
safety. If acquisition or relocation is undertaken, it must be a precursor to another eligible
activity (funded with CDBG or other resources) that directly eliminates the specific
conditions of blight or physical decay, or environmental contamination. The subrecipient
must include the following in its application for funding:
(i) A description of the specific condition of blight or physical decay treated; and
(ii) For rehabilitation carried out under this category, a description of the specific
conditions detrimental to public health and safety which were identified and the details
and scope of the CDBG assisted rehabilitation by structure.

c. Activities to address slums or blight in an urban renewal area. An activity will be
considered to address prevention or elimination of slums or blight in an urban renewal
area if the activity is:
(i) Located within an urban renewal project area or Neighborhood Development Program
(NDP) action area; i.e., an area in which funded activities were authorized under an
urban renewal Loan and Grant Agreement or an annual NDP Funding Agreement,
pursuant to title I of the Housing Act of 1949; and
(ii) Necessary to complete the urban renewal plan, as then in effect, including initial land
redevelopment permitted by the plan. The subrecipient must include in its application for
funding a copy of the Urban Renewal Plan, as in effect at the time the activity is carried
out, including maps and supporting documentation.

3. Activities designed to meet community development needs having a particular urgency: In the absence of substantial evidence to the contrary, an activity will be
considered to address this objective if the applicant, and subsequently the County, certify
that the activity is designed to alleviate existing conditions which pose a serious and
immediate threat to the health or welfare of the community which are of recent origin or
which recently became urgent, that the applicant and the County are unable to finance the
proposed project with their own revenues, and that other sources of funding have proven to
be unavailable. A condition will generally be considered to be of recent origin if it developed
or became critical within 18 months preceding the CDBG Program application submission
date. In short, to qualify as an Urgent Community Development Need, a project would have
to address a "recent catastrophe" that is beyond the fiscal capability of the applicant and the County. CDBG funds can only be used as absolute funding of last resort.
EXHIBIT I

DETERMINING SERVICE AREAS

As discussed in Chapter 3 under the L/M Income Area Benefit subcategory of the L/M income national objective, once it has been determined that an activity provides a benefit to all the residents of an area, the activity may meet the L/M Income Benefit national objective only if the area served by the activity contains a sufficiently high percentage of L/M income residents. As also noted in that section, accurately determining the area served by the activity is critical for these purposes. This Appendix provides guidance on how to determine the area served by an activity.

Some activity types do not require any judgment in determining the area served for purposes of the CDBG program. This is because the area served by such an activity has already been determined for other purposes. Perhaps most notable among these activities are police precincts, fire stations, and schools. In each such case, specific boundaries have already been determined so that the persons involved know which facility serves persons or properties located at a particular address within the community. When boundaries such as these have been determined, no further work should be needed for purposes of identifying the area served by assisting the facility or providing the service.

Moreover, in many communities the planning department or the department or agency administering a particular facility or service, for their own purposes, establishes service areas for things such as libraries, parks, playgrounds, etc. Again, the decision to assist these services or facilities with CDBG funds should not require any additional work to identify the area to be served.

Generally speaking, it is reasonable to assume that certain kinds of facilities serve only very small areas. For example, sidewalks, gutters, trees, and street lights on a residential street would usually benefit only the residents of the immediately adjacent area. The same would be true for tot-lots and small playgrounds. Therefore, the area served by such activities is usually limited to a few census block groups surrounding the area in which they are located.

When the grantee does not already have an identification of the area served for a given facility or service, it will be necessary for the grantee to determine the service area before CDBG assistance may be provided if the activity is to qualify under the L/M Income Area Benefit criteria. As previously indicated, the grantee’s determination of the area served will usually be accepted by HUD, unless there are indications that the grantee defined area is clearly too small or too large. The factors to be considered in making the determination of the area served (both by the grantee and HUD) for these purposes are:

The nature of the activity;
The location of the activity;
Accessibility issues, and
The availability of comparable activities.
Each of these factors is discussed briefly below.

**Nature of Activity**

In determining the boundaries of the area served by a facility, its size and how it is equipped need to be considered. For example, a park that is expected to serve an entire neighborhood cannot be so small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at any one time. Conversely, a park which contains three ball fields, or a ballfield with grandstands that can accommodate hundreds of spectators, could not reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small, two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons passing through from other areas.

**Location of Activity**

Where an activity is located will also affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. A library, for example, cannot reasonably be claimed to benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhood as well as the one in which it is located. (Note that the grantee may carry out activities that are even outside its jurisdiction if it is done in accordance with §570.309.)

**Accessibility**

The accessibility of the activity also needs to be considered in defining the area served. For example, if a river or an interstate highway forms a geographic barrier that separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in determining the area served. Other limits to accessibility may apply to particular activities. For example, the amount of fees to be charged, the time or duration that an activity would be available, access to transportation and parking, and the distance to be traveled can all constitute barriers to the ability of persons to benefit. Language barriers might also constitute an accessibility issue in a particular circumstance.

**Comparable Activities**

The nature, location, and accessibility of comparable facilities and services must also be considered in defining a service area. In most cases, the service area for one activity should not overlap with that of a comparable activity (e.g., two community centers, two clinics, or two neighborhood housing counseling services).

**“Fit” of Service Area**

Because the regulations require that census data be used to the maximum extent feasible for determining the income of persons residing in service areas, the boundaries of the service area
determined by the grantee for the activity need to be compared with the boundaries of census divisions (tracts, block groups, etc.). The census divisions that best fall within the service area should be used for defining the service area for purposes of reporting on the activity and for calculating the percentage of L/M income persons residing in that area. While this means that the census divisions chosen for this purpose may exclude some limited number of persons that are in the actual service area or include some who are not, the practicality of using the census data will override unless the proportion of persons so excluded or included is too great. The alternative would be to survey excluded/included persons and to adjust the data obtained from the census computer runs accordingly. Surveys can be quite costly and their use should be limited whenever possible.

**Commercial Service Areas**

A store will usually be considered to serve an area generally. Where the business itself has had a recent market survey to define the area it serves, it should be used for CDBG purposes. Where it does not have such a survey, an analysis of the location and accessibility of comparable stores should be undertaken to define the area served. When the CDBG assistance provided is not to a particular business but to the shopping center or commercial strip in which it is located (e.g., facade improvements), the area served would be that of the entire center or strip. Again, an analysis of comparable centers/strips should be undertaken in defining the service area. Note that it may not always be possible to determine the area served by a commercial business, such as in the case where the businesses depend on tourists. Moreover, some commercial facilities serve a very broad area (e.g., a regional shopping mall) and the area may be so large an area that it is unlikely to meet the 51% L/M income residents test.
ELIGIBLE ACTIVITIES

Acquisition

Acquisition in whole or in part by the subrecipient, or other public or private nonprofit entity, by purchase, long-term lease, donation, or otherwise, of real property (including air rights, water rights, rights-of-way, easements, and other interests therein) for any eligible public purpose. In order to be considered acquisition, a permanent interest in the property must be obtained. Long-term leases only qualify as acquisition if they are for 15 years or more. Acquisition of real property is subject to 570.606 Displacement, Relocation, Acquisition, and Replacement of Housing. Additionally, acquisition of real property is subject to the requirements under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U.S.C. 4601-4655).

Real property acquisition does not include:

1. The costs of movable equipment, furnishings, or machinery.
2. A “land write-down” in which land is purchased at one price and then sold to the same entity at a lower price. This is not an eligible activity since it does not constitute a bona fide acquisition.
3. Acquiring newly-constructed housing or acquiring an interest in the construction of new housing.

Application Submission Information

1. Project Description
   a. Provide a detailed description of the real property to be acquired. Include in this discussion a description of any existing buildings and site improvements.
   b. Indicate the present zoning and land use of the real property to be acquired. Indicate whether the activity will result in a change in use of the real property.
   c. Describe the intended reuse of the property subsequent to its acquisition.

2. Project Location
   a. Identify the exact geographic location of the real property. Indicate property address and nearest intersecting street. Indicate in what census tract and block group the activity is located. Provide a map indicating the exact location of the project.
   b. Indicate if the real property is located in or will have any impact on the following:
      (i) National Register Historic District
      (ii) 100 Year Floodplain
      (iii) Designated Wetlands Area
   c. Discuss how the proposed activity relates to any long-range acquisition program, and what the objectives of the program are.

3. Project Benefit
   a. Describe the existing problems or conditions to be corrected by the proposed activity.
b. Identify the persons affected by these conditions.

c. Discuss how the proposed activity will correct these conditions.

OTHER PROGRAM REQUIREMENTS - Please note, these requirements need to be addressed if the acquisition activity is funded. See Section VII for complete details.

570.503 (b)(8) Reversion of Assets.
570.504 Program Income
570.505 Use of Real Property
570.602 Section 109 of the Act. --Non-discrimination
570.603 Labor Standards
570.604 Environmental Standards
570.605 National Flood Insurance Program
570.606 Displacement, relocation, acquisition, and replacement of housing
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest

NOTE: The Office of Housing and Community Development has as its primary goal the provision of safe, affordable housing. For this reason, our program will not consider projects that will incur relocation costs as a result of displacement of persons from housing units.
Public Improvements

Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in § 570.207 Ineligible Activities, carried out by a public or private nonprofit entity. Public improvements include but are not limited to: streets, curbs, sidewalks, storm drainage, sanitary sewers, parks and recreation facilities, community centers, and libraries. In undertaking such activities, design features and improvements which promote energy efficiency may be included. Such activities may also include the execution of architectural design features, and similar treatments intended to enhance the aesthetic quality of facilities and improvements receiving CDBG assistance, such as decorative pavements, railings, sculptures, pools of water and fountains, and other works of art. In certain cases, nonprofit entities and subrecipients may acquire title to public facilities. When such facilities are owned by nonprofit entities or subrecipients, they shall be operated so as to be open for use by the general public during all normal hours of operation. Public facilities and improvements eligible for assistance under this paragraph are subject to the policies in §570.200(b) & (c).

Multi-Use Building/Facility (§570.200 (b) Special policies governing facilities.)

A public facility otherwise eligible for assistance under the CDBG program may be provided with CDBG funds even if it is part of a multiple use building containing ineligible uses under the following conditions:

- The facility which is otherwise eligible and proposed for assistance must occupy a designated and discrete area within the larger facility; and
- The subrecipient can determine the costs attributable to the facility proposed for assistance as separate and distinct from the overall costs of the multiple-use building and/or facility.
- Allowable costs are limited to those attributable to the eligible portion of the building/facility.

Reasonable fees may be charged for the use of the facilities assisted with CDBG funds, but charges such as excessive membership fees, which will have the effect of precluding low and moderate income persons from using the facilities, are not permitted.

Special Assessments (§570.200 (c))

Special Assessments are defined as the recovery of the capital costs of a public improvement through a fee or charge levied or filed as a lien against a parcel of real estate as a direct result of benefit derived from the installation of a public improvement, or a one-time charge made as a condition of access to a public improvement. Periodic charges based on the use of a public improvement, such as water or sewer user charges, even if such charges include the recovery of all or some portion of the capital costs of the public improvement are not considered to be special assessments. Where CDBG funds are used to pay all or part of the cost of a public improvement, special assessments may be imposed as follows:

1. Special assessments to recover the CDBG funds may be made only against properties owned and occupied by persons not of low and moderate income. Such assessments constitute program income in accordance with 24 CFR 570.503(b)(3). (Refer to Section 7 Other Program Requirements.)

2. Special assessments to recover the non-CDBG portion may be made provided that CDBG funds are used to pay the special assessment in behalf of all properties owned and occupied by low and moderate income persons; except that CDBG funds need not be used to pay the special assessments in behalf of properties owned and occupied by moderate income persons if the grant recipient certifies that it does not have sufficient CDBG funds to pay the assessments in behalf of all of the low and moderate income owner-occupant persons. Funds collected through such special assessments are not program income.
Application Submission Information

1. Project Description

   a. (i) Provide a detailed project profile. Check the appropriate box to indicate the category of eligible activity. Refer to the descriptions below for eligible categories.

   **PI-01 Street Improvements**
   Installation or repair of streets, street drains, storm drains, curbs and gutters, tunnels, bridges, and traffic lights/signs. Also use PI-01:
   - for improvements that include landscaping, street lighting, and/or street signs (commonly referred to as “streetscaping”).
   - if sidewalk improvements (see code PI-02) are part of more extensive street improvements.

   **PI-02 Sidewalks Improvements**
   Construction or reconstruction of sidewalks. Use PI-02 for sidewalk improvements that include the installation of trash receptacles, lighting, benches, and trees. Also use PI-02 for curb ramp installations in low-and-moderate-income service areas that are primarily residential.

   **PI-03 Water/Sewer Improvements**
   Installation or replacement of water lines, sanitary sewers, storm sewers, and fire hydrants. Costs of street repairs (usually repaving) made necessary by water/sewer improvement activities are included under PI-03.
   (For water/sewer improvements that are part of: more extensive street improvements, use PI-01 (assign PI-01, for example, to an activity that involves paving six blocks of Main Street and installing 100 feet of new water lines in one of those blocks).
   (For construction or rehabilitation of flood drainage facilities, use PI-05.)

   **PI-04 Parks, Recreational Facilities**
   Development of open space areas or facilities intended primarily for recreational use.

   **PI-05 Flood Drainage Improvements**
   Acquisition, construction, or rehabilitation of flood drainage facilities, such as retention ponds or catch basins. Do not use PI-05 for construction/rehabilitation of storm sewers, street drains, or storm drains.
   (Use PI-03 for storm sewers and PI-01 for street and storm drains.)

   **PI-06 Neighborhood Facilities**
   Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood and that will be used for social services or for multiple purposes (including recreation). Such facilities may include libraries and community centers.

   **PI-07 Parking Facilities**
   Acquisition, Construction, or rehabilitation of parking lots and parking garages. Also use PI-07 if the primary purpose of rehabilitating a public facility or carrying out a street improvement activity is to improve parking.
   (If parking improvements are only part of a larger street improvement activity, use PI-01.)

   **Other Public Improvements**
   Consult with the staff of the Office of Housing and Community Development regarding other eligible public improvements.

   (ii) Check the appropriate box to indicate if the facility or improvement is new or existing.
   (iii) Check the appropriate box to indicate if a change of size or capacity of the facility by >20%.
   (iv) Check the appropriate box to indicate if the project will change the land use.
   (v) Provide a detailed description of the public facility or improvement to be made, including and indication of new materials, dimensions, and quantities, and as applicable, existing materials, dimensions, and quantities.
   (vi) Describe any existing buildings and site improvements that comprise the facility.
   (vii) Indicate whether or not your organization owns the building.
(viii) Indicate if you currently lease or will be leasing space in the building to a tenant.
(ix) State the current land use.
(x) Indicate the year of construction of the building.

b. (i) Indicate the primary function of the facility. Indicate programs or services provided.
(ii) Indicate if the facility is part of a multi-use building. (Refer to discussion of multi-use building above.)

c. (i) Indicate if any construction work or related activities have already been initiated.
(ii) Indicate if the activity requires special permits, reviews, or local approvals. If permits, etc. are required, identify the permit and the jurisdictional agency.
(iii) Indicate if a design professional has been engaged to develop project specifications and a cost estimate.
(iv) Indicate if federal prevailing wages pursuant to the Davis Bacon Act have been factored into the cost estimate. Prevailing wages under the Davis Bacon Act are applicable to the project if the estimated cost exceeds $2,500. All construction work related in time, place, and purpose is subject to the federal wage requirements.
(v) Complete the 2018 Detailed Project Cost Form and include with your application submission.
(vi) Discuss how this project would proceed without the support of County CDBG funding.
(vii) Indicate if you will levy special assessments to recover the cost of improvements. (Refer to discussion of special assessments above.)
(viii) Indicate whether or not the proposed activity relates to a phased approach or master plan to provide or improve the infrastructure or facility in the same neighborhood or geographic area. As applicable, attach a detailed description of the scope of work for the entire project that identifies the individual component phases, the project schedule and sequencing, and the financial plan for supporting all costs of the comprehensive improvements.

2. Project Location

a. (i through v) Identify the exact geographic location of the facility or improvements. Indicate the property address and nearest intersecting street, or indicate limits of proposed work (e.g. Main St. between 1st Ave. and 3rd Ave.) Indicate in what congressional district, census tract and block group the activity is located. Provide a USGS 7.5 minute quadrangle map indicating the exact location of the project.

b. Indicate if the public improvement is located in or will have any impact on the following:
   (i) National Register Historic District
   (ii) 100 Year Floodplain
   (iii) Designated Wetlands Area

c. Discuss how the proposed activity relates to any long-range acquisition program, and / or temporary easements by purchase or leasing that would be subject to the Uniform Relocation Act.

d. (i) Indicate whether or not facility / improvement is located in any jurisdictions that have opted out of the County CDBG program.
(ii) If the facility / improvements are located in a jurisdiction that has opted out of the County CDBG program, discuss how your facility / program will serve clients in all parts of Montgomery County.

e. Indicate if the public facilities in your community conform to Uniform Federal Accessibility Standards (UFAS) (appendix A to 41 CFR part 101-19, subpart 101-19.6, for general type buildings) as required by the Architectural Barriers Act of 1968 and the Americans with Disabilities Act of 1990. If one or more of your public facilities are not compliant, you must state your plan for accommodating disabled persons from these facilities.
3. Project Benefit

a.  
   (i) Define the geographic area that is served by the facilities to be provided or improved by identifying the physical features (e.g. roads, railroad lines, creeks, etc.) that delineate the area. List each physical feature that serves as a boundary on the individual lines provided, adding lines as needed. Additionally, you must attach a map that depicts the boundaries of the service area.
   (ii) Provide documentation that the service area of the facility is primarily residential. Indicate the total number of properties/parcels located in the service area
   (iii) If area is determined to be blighted, describe boundaries of blighted area – Attach map that indicates boundaries of designated blight area

b.  
   (i) Describe the existing physical problems or conditions to be corrected and discuss how residents of this area are impacted OR
   (ii) If area is determined to be blighted, describe the existing physical conditions of slum or blight.

c.  
   (i) Discuss how the proposed activity will correct these conditions OR
   (ii) If area is determined to be blighted, discuss how the activity will address one or more of the conditions which contributed to the deterioration of the area.

d.  
   Indicate whether or not the proposed activity relates to and contributes to the feasibility of development of affordable housing, particularly outside of racial, ethnic and low/moderate income concentration

OTHER PROGRAM REQUIREMENTS - Please note that these requirements need to be addressed if the public improvement activity is funded. See Section VII for complete details.

570.503 (b)(8) Reversion of Assets.
570.602 Section 109 of the Act. --Non-discrimination
570.603 Labor Standards
570.604 Environmental Standards
570.605 National Flood Insurance Program
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
570.614 Architectural Barriers Act and the Americans with Disabilities Act
Section IV
ELIGIBLE ACTIVITIES

Public Facilities

Acquisition, construction, reconstruction, rehabilitation or installation of public facilities carried out by public or private nonprofit entities. Public Facilities include but are not limited to shelters for the homeless, convalescent homes; hospitals; nursing homes; battered spouse shelters; halfway houses for run-away children, drug offenders or parolees; group homes for mentally disabled persons, and temporary housing for disaster victims. In undertaking such activities, design features and improvements which promote energy efficiency may be included. Such activities may also include the execution of architectural design features, and similar treatments intended to enhance the aesthetic quality of facilities and improvements receiving CDBG assistance, such as decorative pavements, railings, sculptures, pools of water and fountains, and other works of art. Facilities designed for use in providing shelter for persons having special needs are considered public facilities and not subject to the prohibition of new housing construction. When facilities are owned by nonprofit entities, they shall be operated so as to be open for use by the general public during all normal hours of operation. Facilities containing both eligible and ineligible uses are subject to special policies under §570.200 (b). See the discussion/description below on the provisions of this policy. Public Facilities may also be subject to special policies under §570.200 (c). See discussion/description of these special policies under Public Improvements above.

Multi-Use Building/Facility (§570.200 (b))

A public facility otherwise eligible for assistance under the CDBG program may be provided with CDBG funds even if it is part of a multiple use building containing ineligible uses under the following conditions:

The facility which is otherwise eligible and proposed for assistance must occupy a designated and discrete area within the larger facility; and

The subrecipient can determine the costs attributable to the facility proposed for assistance as separate and distinct from the overall costs of the multiple-use building/facility.

Allowable costs are limited to those attributable to the eligible portion of the building/facility.

Reasonable fees may be charged for the use of the facilities assisted with CDBG funds, but charges such as excessive membership fees, which will have the effect of precluding low and moderate income persons from using the facilities, are not permitted.

Application Submission Information

1. Project Description

   a. (i) Provide a detailed project profile. Check the appropriate box to indicate the category of eligible activity. Refer to the descriptions below for eligible categories.

      **PF-01 Neighborhood Facilities**
      Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood and that will be used for social services or for multiple purposes (including recreation). Such facilities may include libraries and community centers.

      **PF-02 Senior Centers**
      Acquisition, construction, or rehabilitation of facilities (except permanent housing) for seniors. PF-02 may be used for a facility serving both the elderly and the handicapped provided it is not intended primarily to serve persons with handicaps. If it is, use PF-03 Handicapped Centers instead.

      **PF-03 Handicapped Centers**
      Acquisition, construction, or rehabilitation of centers, group homes, and other facilities (except
permanent housing) for the handicapped. PF-03 may be used for a facility serving both the handicapped and the elderly provided it is not intended primarily to serve the elderly. If it is, use PF-02 instead.

**PF-04 Health Facilities**
Acquisition, construction, or rehabilitation of physical or mental health facilities. Examples of such facilities include neighborhood clinics, hospitals, nursing homes, and convalescent homes.

**PF-05 Youth Centers**
Acquisition, construction, or rehabilitation of facilities intended primarily for young people age 13 to 19. These include playground and recreational facilities that are part of a youth center. For the acquisition, construction or rehabilitation of facilities intended primarily for children age 12 and under, use PF-06.

**PF-06 Child Care Centers**
Acquisition, construction, or rehabilitation of facilities intended primarily for children age 12 and under. Examples are daycare centers and Head Start preschool centers. For the construction or rehabilitation of facilities for teenagers, use PF-05.

**PF-07 Homeless Facilities (not operating costs)**
Acquisition, construction, or rehabilitation of temporary shelters and transitional housing for the homeless, including battered spouses, disaster victims, runaway children, drug offenders, and parolees.

**Other Public Facilities**
Consult with the staff of the Office of Housing and Community Development regarding other eligible public facilities.

(ii) Check the appropriate box to indicate if the public facility is new or existing.
(iii) Check the appropriate box to indicate if a change of size or capacity of the facility by >20%.
(iv) Check the appropriate box to indicate if the project will change the land use.
(v) Provide a detailed description of the public facility or improvement to be made, including an indication of new materials, dimensions, and quantities, and as applicable, existing materials, dimensions, and quantities.
(vi) Describe any existing buildings and site improvements that comprise the facility.
(vii) Indicate whether or not your organization owns the building.
(viii) Indicate if you currently lease or will be leasing space in the building to a tenant.
(ix) State the current land use.
(x) Indicate the year of construction of the building.

b. (i) Indicate the primary function of the public facility(ies) to be provided or improved, and discuss the programs or services that are provided from the facility(ies).
(ii) If the facility is part of a multi-use building, discuss how the proposed project will assist with improvement(s) to a designated and discrete area within the larger facility that is eligible for CDBG. (Refer to discussion of multi-use building above.)

c. (i) Indicate if any construction work or related activities have already been initiated.
(ii) Indicate if the activity requires special permits, reviews, or local approvals. If permits, etc. are required, identify the permit and the jurisdictional agency.
(iii) Indicate if a design professional has been engaged to develop project specifications and a cost estimate.
(iv) Indicate if federal prevailing wages pursuant to the Davis Bacon Act have been factored into the cost estimate. Prevailing wages under the Davis Bacon Act are applicable to the project if the estimated cost exceeds $2,500. All construction work related in time, place, and purpose is subject to the federal wage requirements.
(v) Complete the 2018 Detailed Project Cost Form and include with your application submission.
(vi) Discuss how this project would proceed without the support of County CDBG funding.
(vii) Indicate if you will levy special assessments to recover the cost of improvements. (Refer to discussion of special assessments above.)
(viii) Indicate whether or not the proposed activity relates to a phased approach or master plan to
provide or improve the infrastructure or facility in the same neighborhood or geographic area. As applicable, attach a detailed description of the scope of work for the entire project that identifies the individual component phases, the project schedule and sequencing, and the financial plan for supporting all costs of the comprehensive improvements.

d. Discuss, as applicable, how the project relates to and contributes to the feasibility of the development of affordable housing, particularly outside of areas of racial, ethnic, and low/moderate income concentration.

2. Project Location

a. (i) Identify the exact geographic location of the public facility(ies). Indicate the property address and nearest intersecting street, or indicate limits of proposed work (e.g. Main St. between 1st Ave. and 3rd Ave.).
(ii) Describe any targeted geographic area of service related to the programs or services provided from the facility. Attach a USGS 7.5 minute quadrangle map indicating the exact location of the activity and any targeted service area.
(iii through vi) In the spaces provided indicate the Congressional District, municipality, census tract, and census block group of the project location.

b. Indicate if the facility is located in or will have any impact on the following:
   (i) National Register Historic District
   (ii) 100 Year Floodplain
   (iii) Designated Wetlands Area

c. (i) Indicate whether or not facility / improvement is located in any of the jurisdictions that have opted out of the County CDBG program.
   (ii) If the facility / improvements are located in a jurisdiction that has opted out of the County CDBG program, discuss how your facility / program will serve clients in all parts of Montgomery County. You must discuss your agency’s promotional strategies for making prospective clients in all parts of Montgomery County aware of the programs or services provided from the facility. And, you must demonstrate that your clients will be drawn primarily from the urban county, and that reasonable benefits from the activity will accrue to residents within the jurisdiction of the urban county.

d. Indicate if the public facilities in your community conform to Uniform Federal Accessibility Standards (UFAS) (appendix A to 41 CFR part 101-19, subpart 101-19.6, for general type buildings) as required by the Architectural Barriers Act of 1968 and the Americans with Disabilities Act of 1990. If one or more of your public facilities are not compliant, you must state your plan for accommodating disabled persons from these facilities.

3. Project Benefit

a. Discuss in detail and provide authoritative documentation for one of the following items which best fits your activity:
   (i) Provide documentation establishing that the public facility(ies) is designed for the particular needs of or used exclusively by abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census’ Current Population Reports definition of "severely disabled," homeless persons, illiterate adults, persons living with AIDS, or migrant farm workers, or
   (ii) Provide documentation of procedures to obtain information on family size and income so that it is evident that at least 51% of the clientele being served by the facility are persons whose family income does not exceed the low and moderate income limit, or
   (iii) Provide documentation that describes any income eligibility requirements which limit the programs or services provided from the facility exclusively to low and moderate income persons,
or
(iv) Provide documentation that describes how the nature and, if applicable, the location of the facility establishes that it is used predominantly by low and moderate income persons.

b. Projected number of clients served by this project. Provide the following data pertaining to income and race/ethnicity of the clients you served in the most recently completed 12 month period for which this data is available.
(i) Indicate the total number of Moderate Income clients. Moderate income clients are in the 80% Median income category.
(ii) Indicate the total number of Low Income Clients. Low Income clients are in the 50% Median income category.
(iii) Indicate the total number of Extremely Low Income Clients. Extremely low-income clients are in the 30% Median income category.
(iv) Total Other Clients (above 80% Median). Other clients whose incomes exceed the 80% Median income category.
TOTAL Indicate the total number of clients served by adding the amounts indicated on lines b(i), b(ii), b(iii) and b(iv).

b. Indicate the number of clients by race/ethnicity. For each racial category indicated (i – x), provide the total number of clients who are members of that category in the corresponding block in the column labeled “#Total.”
For each racial category indicated, provide in the column labeled “#Hispanic” the total number of clients who are members of that category and are also Hispanic.
TOTAL Indicate the total number of clients served by adding the amounts indicated in the column labeled “#Total” for each racial category. Indicate the total number of Hispanic clients served by adding the amounts indicated in the column labeled “#Hispanic” for each racial category.

d. Indicate the number of clients who are single-heads of household by providing in the row labeled “Total” the number of male and female single heads of household in their respective columns.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the public facility activity is funded. See Sec. VII for complete details.

570.503 (b)(8) Reversion of Assets.
570.200 (j) Faith-based Activities
570.602 Section 109 of the Act. --Non-discrimination
570.603 Labor Standards
570.604 Environmental Standards
570.605 National Flood Insurance Program
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
Public Services

Provision of public services (including labor, supplies, and materials) including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments), homebuyer downpayment assistance, or recreational needs. To be eligible for assistance, a public service must be either a new service, or a quantifiable increase in the level of an existing service above that which has been provided by or on behalf of the unit of general local government (through funds raised by the unit, or received by the unit from the State in which it is located) in the 12 calendar months before the submission of the action plan. (An exception to this requirement may be made if HUD determines that any decrease in the level of a service was the result of events not within the control of the unit of general local government.)

Application Submission Information

1. Project Description
   a. Provide a detailed description of the services to be provided by the project. Describe when, how, and to whom each service will be provided and the frequency with which the service will be provided. Identify which staff positions will have a role in the delivery of the service. Attach staff position descriptions. Discuss how the proposed activity relates to a comprehensive plan to provide the service over an extended period of time, including financial support.
   b. Indicate the primary goals of the services to be provided and how the goals will be quantified, monitored and tracked. This must include the number of clients to be served, units/hours of service to be provided, and a quantifiable measurement of accomplishment for each service.
   c. Indicate whether the project is a new service not previously funded by the County, or a supplement to an existing service. If supplementing an existing service, discuss how the project will increase the level of service currently being provided. Indicate whether the activity is currently supported or was previously supported (in the 12 months prior to the application due date) with any other source of County funds. If so, explain and list sources. Discuss the status of those funds and why CDBG funds are now being sought.
   d. Discuss, as applicable, how your public services could relate to the feasibility of affordable housing to expand fair housing choice for LMI families and members of the protected classes particularly outside the existing areas of racial, ethnic, and low/moderate income concentration.

2. Project Location
   a. Indicate the location from where the services will be delivered (i.e. street address) and include a map that clearly identifies this location. Describe the targeted geographic area in which the service will be provided and include a map that clearly delineates the targeted area.
   b. Indicate the congressional district in which the facility is located. Indicate if the facility or will have any impact on the following:
      (i) National Register Historic District
      (ii) 100 Year Floodplain
      (iii) Designated Wetlands Area
   c. Identify if the service is located in any of the following municipalities: Abington Township,
Conshohocken Borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality. If the service is located in any one of these municipalities, you must discuss your agency’s promotional strategies for making prospective clients in all parts of Montgomery County aware of the programs or services provided. How will you demonstrate that the clients are drawn from the urban county?

3. Project Benefit

a. Discuss in detail and provide authoritative documentation for one of the following items which best fits your project:
   (i) Provide documentation establishing that the service is designed for the particular needs of or used exclusively by abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census’ Current Population Reports definition of "severely disabled," homeless persons, persons living with AIDS, illiterate adults, or migrant farm workers, or

   (ii) Provide documentation of procedure to obtain information on family size and income so that it is evident that at least 51% of the clientele benefiting from the public service are persons whose family income does not exceed the low and moderate income limit. Submit a copy of the agency in-take forms that assist in making an income determination for clients served, or

   (iii) Provide documentation that describes any income eligibility requirements which limit the programs or services provided from the facility exclusively to low and moderate income persons, or

   (iv) Provide documentation which describes how the nature and, if applicable, the location of the service or facility establishes that it is used predominantly by low and moderate income persons.

b. Projected number of clients served by this project

Provide the following data pertaining to income and race/ethnicity of the clients you served in the most recently completed 12 month period for which this data is available.

   (i) Indicate the total number of Moderate Income clients. Moderate income clients are in the 80% Median income category.
   (ii) Indicate the total number of Low Income Clients. Low Income clients are in the 50% Median income category.
   (iii) Indicate the total number of Extremely Low Income Clients. Extremely low-income clients are in the 30% Median income category.
   (iv) Total Other Clients (above 80% Median). Other clients whose incomes exceed the 80% Median income category.
      TOTAL Indicate the total number of clients served by adding the amounts indicated on lines b (i), b(ii), b(iii), b(iv).

c. Indicate the number of clients by race/ethnicity. For each racial category indicated, provide the total number of clients who are members of that category in the corresponding block in the column labeled “#Total.” For each racial category indicated, provide in the column labeled “#Hispanic” the total number of clients who are members of that category and are also Hispanic.

   TOTAL Indicate the total number of clients served by adding the amounts indicated in the column labeled “#Total” for each racial category. Indicate the total number of Hispanic clients served by adding the amounts indicated in the column labeled “#Hispanic” for each racial category.

d. Indicated the number of clients who are single-heads of household by providing in the row labeled “Total” the number of male and female single heads of household in their respective columns.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the public service activity is funded. Please see Sec. VII for complete details.
570.200 (j) Faith-based Activities
570.602 Section 109 of the Act. --Non-discrimination
570.604 Environmental Standards
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
570.613 Eligibility restrictions for certain resident aliens
Section IV
ELIGIBLE ACTIVITIES

Housing Multi-Family Rehabilitation

Provision to facilitate the rehabilitation of existing housing stock which is occupied by residents who are very low and low income to preserve housing stock.

Application Submission Information

1. Project Description

   a. Provide a detailed physical description of the existing structure and improvements to be rehabilitated for residential purposes. Indicate the current permitted land use and date the building was constructed. Include in your discussion an identification of the after-rehabilitation use of the structure as single-family or multi-family; owner-occupied or tenant occupied; a mixed-use/multi-use structure (discuss types of uses involved); the height of building in terms of the number of stories; and the number of residential units in the structure; discuss the category of rehab—e.g. for rental housing, group home, transitional housing, etc.

   b. Provide a detailed description of the rehabilitation work to be performed on the structure and improvements. Indicate if the proposed rehabilitation work will result in either the temporary or permanent displacement of an occupant(s) of one or more dwellings units in the structure. If displacement will occur, discuss your plan to provide relocation benefits and services to the occupant(s). Indicate if the proposed rehabilitation work will result in the elimination of any affordable housing units. Discuss, as applicable, the measure to be undertaken to comply with HUD Lead-based Paint requirements pursuant to 24 CFR Part 35.

   c. Provide a detailed cost estimate for the rehabilitation project identifying the total estimated cost and the portion of costs proposed to be supported with CDBG funding. Indicate whether the project will involve a change in the unit density by more than 20% or changes in land use from residential to non-residential. State whether the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation. Discuss how the proposed rehabilitation work may be related to a master plan for capital improvement of the structure.

   d. Does the developer have a written agreement with an advocacy organization that agrees to target outreach, affirmative marketing and tracking to members of protected classes? Discuss this relationship.

2. Project Location

   a. Indicate the exact geographic location of the housing unit(s). Indicate the property address(es) and nearest intersecting street(s), or indicate limits of proposed work (e.g. Main Street between 1st Avenue and 3rd Avenue). Provide a map(s) indicating the exact location of the projects. NOTE: Housing units located in Abington Township, Conshohocken borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality are not eligible for funding.

   b. Is the project located in a census tract outside the areas of racial, ethnic and LMI concentration? Discuss, as applicable, how the project relates to and contributes to the feasibility of the development of affordable housing, particularly outside of areas of racial, ethnic and low/moderate income concentration.
Indicate the congressional district, Municipality, Census Tract(s), and Census Block Group(s).

Indicate if the housing unit(s) is/are located in or will have any impact on the following:
(i) National Register Historic District
(ii) 100 Year Floodplain
(iii) Designated Wetlands Area

3. Project Benefit

Discuss in detail and provide authoritative documentation for:

a. Provide documentation of procedures to obtain information on household size and income so that it is evident that at least 51% of the housing units being rehabilitated will be occupied by low and moderate income households upon completion of the rehabilitation.

b. Provide a rent schedule that indicates the rent to be charged after rehabilitation for each dwelling unit in the structure, and show a comparison of these rents to HUD Fair Market Rents.

c. Indicate whether five percent (5%) of the dwelling units in the structure are readily accessible to and usable by individuals with handicaps, or discuss how the rehabilitation of the structure will result in a minimum of 5% of the units be readily accessible to and usable by individuals with handicaps. Discuss the number of UFAS accessible units to be provided as a percentage of total units.

4. Projected number of households served by this project

Provide the following data pertaining to income and race/ethnicity of the households you served in the most recently completed 12 month period for which this data is available.

a. Indicate the total number of Moderate Income households. Moderate income households are in the 80% Median income category.

b. Indicate the total number of Low Income Households. Low Income households are in the 50% Median income category.

c. Indicate the total number of Extremely Low Income Households. Extremely low-income households are in the 30% Median income category.

d. Total Other Households (above 80% Median). Other households whose incomes exceed the 80% Median income category.

TOTAL. Indicate the total number of households served by adding the amounts indicated on lines 4a., 4b., 4c. and 4d.

e. Indicate the number of households by race/ethnicity. For each racial category indicated, provide the total number of households who are members of that category in the corresponding block in the column labeled “#Total.” For each racial category indicated, provide in the column labeled “#Hispanic” the total number of households who are members of that category and are also Hispanic.

TOTAL. Indicate the total number of households served by adding the amounts indicated in the column labeled “#Total” for each racial category. Indicate the total number of Hispanic households served by adding the amounts indicated in the column labeled “#Hispanic” for each racial category.

f. Indicated the number of households who are single-head of household by providing in the row labeled “Total” the number of male and female single head of household in their respective
OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the public service activity is funded. Please see Sec. VII for complete details.

570.200 (j) Faith-based Activities
570.602 Section 109 of the Act. --Non-discrimination
570.603 Labor Standards (these requirements apply to the rehabilitation of residential property only if such property contains not less than 8 units)
570.604 Environmental Standards
570.606 Displacement, relocation, acquisition, and replacement of housing
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
Section IV

ELIGIBLE ACTIVITIES

Housing Single Family Rehabilitation

Acquire for the purpose of rehabilitation, and rehabilitate privately owned buildings and improvements, for use or resale for permanent single-family residential purposes which, upon completion, will be occupied by low- and moderate-income households. Improvements to a single-family residential property which is also used as a place of business, which are required in order to operate the business, need not be considered to be rehabilitation of a commercial or industrial building, if the improvements also provide general benefit to the residential occupants of the building.

Application Submission Information

1. Project Description
   a. Provide a detailed physical description of the existing structure and improvements to be rehabilitated for residential purposes. Indicate the current permitted land use and date the building was constructed. Include in your discussion an identification of the after-rehabilitation use of the structure as single-family owner-occupied, or type of occupancy—e.g. elderly or special needs housing.
   b. Provide a detailed description of the rehabilitation work to be performed on the structure and improvements. Indicate if the proposed rehabilitation work will result in either the temporary or permanent displacement of an occupant(s) of one or more dwellings units in the structure. If displacement will occur, discuss your plan to provide relocation benefits and services to the occupant(s). Indicate if the proposed rehabilitation work will result in the elimination of any affordable housing units. Discuss, as applicable, the measure to be undertaken to comply with HUD Lead-based Paint requirements pursuant to 24 CFR Part 35.
   c. Provide a detailed cost estimate for the rehabilitation project identifying the total estimated cost and the portion of costs proposed to be supported with CDBG funding. Indicate whether the project will involve a change in the unit density by more than 20% or changes in land use from residential to non-residential. State whether the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation. Discuss how the proposed rehabilitation work may be related to a master plan for capital improvement of the structure.

2. Project Location
   a. Indicate the exact geographic location of the housing unit(s). Indicate the property address(es) and nearest intersecting street(s), or indicate limits of proposed work (e.g. Main Street between 1st Avenue and 3rd Avenue). Provide a map(s) indicating the exact location of the projects. NOTE: Housing units located in Abington Township, Conshohocken borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality are not eligible for funding.
   b. Is the project located in a census tract outside the areas of racial, ethnic and LMI concentration? Discuss, as applicable, how the project relates to and contributes to the feasibility of the development of affordable housing, particularly outside of areas of racial, ethnic and low/moderate income concentration.

Indicate the congressional district, Municipality, Census Tract(s), and Census Block Group(s).

Indicate if the housing unit(s) is/are located in or will have any impact on the following:
(i) National Register Historic District  
(ii) 100 Year Floodplain  
(iii) Designated Wetlands Area

3. Project Benefit

Discuss in detail and provide authoritative documentation for:

a. Provide documentation of procedures to obtain information on household size and income so that it is evident that at least 51% of the housing units being rehabilitated will be occupied by low and moderate income households upon completion of the rehabilitation.

b. Provide a rent schedule that indicates the rent to be charged after rehabilitation for each dwelling unit, and show a comparison of these rents to HUD Fair Market Rents.

c. Indicate if the proposed rehabilitation work will result in any structure(s)0 being readily accessible to and usable by individuals with disabilities.

4. Projected number of households served by this project

Provide the following data pertaining to income and race/ethnicity of the households you served in the most recently completed 12 month period for which this data is available.

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>g. Moderate Income</td>
<td></td>
</tr>
<tr>
<td>h. Low Income</td>
<td></td>
</tr>
<tr>
<td>i. Extremely Low Income</td>
<td></td>
</tr>
<tr>
<td>j. Total Other</td>
<td></td>
</tr>
<tr>
<td>k. Race/ethnicity</td>
<td></td>
</tr>
<tr>
<td>l. Single Head of Household</td>
<td></td>
</tr>
</tbody>
</table>

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the public service activity is funded. Please see Sec. VII for complete details.
570.200 (j) Faith-based Activities
570.602 Section 109 of the Act. --Non-discrimination
570.604 Environmental Standards
570.606 Displacement, relocation, acquisition, and replacement of housing
Section IV
ELIGIBLE ACTIVITIES

Removal of Architectural Barriers

Activities directed to the removal of material and architectural barriers that restrict the mobility and accessibility of elderly persons or of adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled" to public facilities and improvements; publicly owned and privately owned non-residential buildings, facilities, and improvements; and the common areas of residential structures containing more than one dwelling unit that do not meet the low and moderate income area benefit or low and moderate income housing benefit criteria of the CDBG program.

Application Submission Information

1. Project Description
   a. Provide a detailed description of the facilities or improvements to be made accessible. Describe, as applicable, any existing buildings and site improvements that comprise the facility. State the current permitted land use and the date the facility was constructed, as applicable. Indicate if the project will change the size or capacity of the facility by more than 20%, or change the land use. Identify major components of the proposed work and indicate estimated quantities.
   b. Indicate the primary function of the facilities to be made accessible. Discuss, as applicable, any programs or services provided from the facility.
   c. Discuss how the proposed project relates to any master plan to remove architectural barriers to facilities or infrastructure in the same neighborhood or geographic area. Include in this discussion the financing plan for supporting all costs of the comprehensive improvements.
   d. Discuss, as applicable, how the project relates to and contributes to the feasibility of the development of affordable housing, particularly outside of areas of racial, ethnic and low/moderate income concentration.

2. Project Location
   a. Identify the exact geographic location of the facility or improvements. Indicate the property address and nearest intersecting street, or indicate limits of proposed work (e.g. Main St. between 1st Ave. and 3rd Ave.). In the spaces provided, indicate the Congressional District, municipality, census tract, and census block group of the project location. Provide a map(s) indicating the exact location of the project.
   b. Indicate if the project is located in or will have any impact on the following:
      (i) National Register Historic District
      (ii) 100 Year Floodplain
      (iii) Designated Wetlands Area
   c. Identify whether the facility is located in any of the following municipalities: Abington Township, Conshohocken Borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality. If the facility is located in any one of these municipalities, you must discuss your agency's promotional strategies for making prospective clients in all parts of Montgomery County aware of the programs or services provided from the facility. How will you demonstrate that the clients are drawn primarily from the urban county?
3. Project Benefit

   a. Describe the material or architectural barrier that is presented by the existing configuration of the public facility or improvement or a component thereof.

   b. Discuss how the project will serve to remove material or architectural barriers to the mobility or accessibility of elderly persons or “severely disabled” adults to the public facility or improvement.

   c. Provide the following data pertaining to income and race/ethnicity of the households you served in the most recently completed 12 month period for which this data is available.

      Indicate the total number of Moderate Income households. Moderate income households are in the 80% Median income category.

      Indicate the total number of Low Income Households. Low Income households are in the 50% Median income category.

      Indicate the total number of Extremely Low Income Households. Extremely low-income households are in the 30% Median income category.

      Total Other Households (above 80% Median). Other households whose incomes exceed the 80% Median income category.

      TOTAL Indicate the total number of households served by adding the amounts indicated on lines c(i), c(ii), c(iii) and c(iv).

   d. Indicate the number of households by race/ethnicity. For each racial category indicated, provide the total number of households who are members of that category in the corresponding block in the column labeled “#Total.” For each racial category indicated, provide in the column labeled “#Hispanic” the total number of households who are members of that category and are also Hispanic.

      TOTAL Indicate the total number of households served by adding the amounts indicated in the column labeled “#Total” for each racial category. Indicate the total number of Hispanic households served by adding the amounts indicated in the column labeled “#Hispanic” for each racial category.

   e. Indicated the number of households who are single-head of household by providing in the row labeled “Total” the number of male and female single head of household in their respective columns.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the removal of architectural barrier activity is funded. See Section VII for complete details.

570.503 (b)(8) Reversion of Assets.
570.602 Section 109 of the Act. --Non-discrimination
570.603 Labor Standards
570.604 Environmental Standards
570.605 National Flood Insurance Program
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
Section IV
ELIGIBLE ACTIVITIES

Rapid Re-Housing

Provision of housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR § 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid rehousing assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 576.105, the short- and medium term rental assistance requirements in 24 CFR § 576.106, and the written standards and procedures established under 24 CFR § 576.400 program.

Application Submission Information

1. Project Description
   a. Provide a detailed description of the specific service to be provided with this grant. Describe intake procedures, eligibility documentation coordination, and referral procedures with mainstream benefits that this program will use. Include how and to whom each service will be provided as well as hours of agency operation. Identify which staff positions will have a role in the delivery of the service. Attach staff position descriptions. Attach the agency’s intake documentation forms.

   b. Indicate the primary goals of the services to be provided and how the goals will be monitored and tracked. This must include the projected number of clients to be served, units/hours of service to be provided, and specific performance measures and outcomes to be used by your agency to track each client. Attach a copy of the agency tracking form(s) to be used for each client. Discuss how your agency will use the Homeless Management Information System (HMIS) to track clients and which staff member(s) will be responsible for entering data and their experience with the HMIS system.

   c. Indicate whether the project is a new service or a supplement to an existing service. If supplementing an existing service, discuss how the project will increase the level of service currently being provided. Discuss the agency’s staff experience with homeless programs and previous management experience with federal grants.

   d. Discuss the average time that households remain in your program and how the agency plans and action steps will decrease the amount of time spent in the program. Identify cooperation with other community agencies that will assist with decreasing time spent in the program. Describe the program plans/design/target dates to assist the clients in becoming progressively more responsible for a larger portion of the rent over time.

   e. If the agency assists the homeless clients with placement in permanent affordable housing, discuss how your agency will assist the clients by expanding fair housing choices outside areas of racial, ethnic, and LMI concentration.

2. Project Location
   a. Identify the location from where the services will be delivered (i.e. street address) and include a map that clearly identifies this location. Describe the targeted geographic area in which the service will be provided and include a map that clearly delineates the targeted area.
b. Indicate if the project is located in or will have any impact on the following:
   (i) National Register Historic District
   (ii) 100 Year Floodplain
   (iii) Designated Wetlands Area

c. Identify whether the facility is located in any of the following municipalities: Abington Township, Conshohocken Borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality. If the facility is located in any one of these municipalities, you must discuss your agency’s promotional strategies for making prospective clients in all parts of Montgomery County aware of the programs or services provided from the facility. How will you demonstrate that the clients are drawn primarily from the urban county?

3. Project Benefit

c. Describe the material or architectural barrier that is presented by the existing configuration of the public facility or improvement or a component thereof.

d. Discuss how the project will serve to remove material or architectural barriers to the mobility or accessibility of elderly persons or “severely disabled” adults to the public facility or improvement.

c. Provide the following data pertaining to income and race/ethnicity of the households you served in the most recently completed 12 month period for which this data is available.

   Indicate the total number of Moderate Income households. Moderate income households are in the 80% Median income category.

   Indicate the total number of Low Income Households. Low Income households are in the 50% Median income category.

   Indicate the total number of Extremely Low Income Households. Extremely low-income households are in the 30% Median income category.

   Total Other Households (above 80% Median). Other households whose incomes exceed the 80% Median income category.

   TOTAL Indicate the total number of households served by adding the amounts indicated on lines c(i), c(ii), c(iii) and c(iv).

f. Indicate the number of households by race/ethnicity. For each racial category indicated, provide the total number of households who are members of that category in the corresponding block in the column labeled “#Total.” For each racial category indicated, provide in the column labeled “#Hispanic” the total number of households who are members of that category and are also Hispanic.

   TOTAL Indicate the total number of households served by adding the amounts indicated in the column labeled “#Total” for each racial category. Indicate the total number of Hispanic households served by adding the amounts indicated in the column labeled “#Hispanic” for each racial category.

g. Indicated the number of households who are single-head of household by providing in the row labeled “Total” the number of male and female single head of household in their respective columns.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the removal of architectural barrier activity is funded. See Section VII for complete details.
570.602 Section 109 of the Act. --Non-discrimination
570.604 Environmental Standards
570.605 National Flood Insurance Program
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
Section IV
ELIGIBLE ACTIVITIES

Fair Housing

The Provision of fair housing services designed to further the fair housing objectives of the Fair Housing Act (42 U.S.C. 3601-20) by making all persons, without regard to race, color, religion, sex, national origin, familial status or handicap, aware of the range of housing opportunities available to them; other fair housing education, and outreach activities; and other activities designed to further the housing objective of avoiding undue concentrations of assisted persons in areas containing a high proportion of low and moderate income persons.

Application Submission Information

1. Project Description

a. Provide a detailed description of Fair Housing activities to be provided by the project. Describe when, how, and to whom Fair Housing activities will be provided and the frequency with which the activities will be provided. Identify which staff positions will have a role in the delivery of the Fair Housing activities. Attach staff position descriptions. Discuss how the proposed activities relate to a comprehensive plan to provide Fair Housing activities over an extended period, including financial support.

b. Indicate the primary objectives of Fair Housing activities to be provided. Describe collaboration, interaction and strategic partnership with the various agencies within the County. How will proposed Fair Housing activities enhance or differ from existing activities now being provided by other agencies in your targeted population.

e. Indicate whether the project is a new Fair Housing activity not previously funded by the County, or a supplement to an existing activity. If supplementing an existing Fair Housing activity, discuss how the project will increase the level of activities currently being provided. Indicate whether the activity is currently supported or was previously supported (in the 12 months prior to the application due date) with any other source of County funds. If so, explain and list sources. Indicate whether other Counties fund the project. Discuss the status of those funds and why CDBG funds are now being sought.

2. Project Location

a. Indicate the location from where Fair Housing activities will be delivered (i.e. street address) and include a map that clearly identifies this location. Indicate client’s accessibility to onsite locations within the County. Describe the targeted geographic area in which the service will be provided and include a map that clearly delineates the targeted area.

b. Indicate if the planning activity located in or will have any impact on the following:
   (i) National Register Historic District
   (ii) 100 Year Floodplain
   (iii) Designated Wetlands Area

c. Indicate if the location of the activity is in any of the following municipalities: Abington Township, Conshohocken Borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality.

   (i) If the shelter is located in any one of these municipalities, you must discuss your agency's
promotional strategies for the programs or services to be provided. You must demonstrate that these procedures endeavor to draw clients from the urban county.

(ii) Indicate the accessibility of services through an on site facility services through an on site facility to Montgomery County residents especially those who are Low and Moderate Income persons. Check the onsite activities location:

(a) Within Montgomery County ___________            (b) Outside Montgomery County_________

3. Project Benefit:

a. Choose any one or combination of items below that best describe your agency’s strategy to overcome impediments to fair housing choice identified in the County’s Analysis of Impediments.

   (i). Provide education and outreach activities that promote fair housing choice to all persons, without regard to race, color, religion, sex, national origin, familial status or handicap, aware of the range of housing opportunities available to them.

   (ii.). Provide education and outreach activities; and other activities designed to further the housing objective of avoiding undue concentrations of assisted persons in areas containing a high proportion of low and moderate-income persons.

   (iii.). Foster compliance for any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the removal of architectural barrier activity is funded. See Section VII for complete details.

570.602 Section 109 of the Act. --Non-discrimination
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
Planning

The Planning activities which consist of all costs of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans, including, but not limited to:

(1) Comprehensive plans;
(2) Community development plans;
(3) Functional plans, in areas such as: (i) Housing, including the development of a consolidated plan; (ii) Land use and urban environmental design; (iii) Economic development; (iv) Open space and recreation; (v) Energy use and conservation; (vi) Floodplain and wetlands management in accordance with the requirements of Executive Orders 11988 and 11990; (vii) Transportation; (viii) Utilities; and (ix) Historic preservation.
(4) Other plans and studies such as: (i) Small area and neighborhood plans; (ii) Capital improvements programs; (iii) Individual project plans (but excluding engineering and design costs related to a specific activity which are eligible as part of the cost of such activity under Sec. Sec. 570.201-570.204); (iv) The reasonable costs of general environmental, urban environmental design and historic preservation studies; and general environmental assessment and remediation-oriented planning related to properties with known or suspected environmental contamination. However, costs necessary to comply with 24 CFR part 58, including project specific environmental assessments and clearances for activities eligible for assistance under this 24 CFR Part 570, are eligible as part of the cost of such activities under Sec. Sec. 570.201-570.204; (v) Strategies and action programs to implement plans, including the development of codes, ordinances and regulations; (vi) Support of clearinghouse functions, such as those specified in Executive Order 12372; and (vii) Analysis of impediments to fair housing choice. (viii) Developing an inventory of properties with known or suspected environmental contamination.

Application Submission Information

1. Project Description
   a. Provide a detailed description of the planning activity to be provided by the project. Describe when, how, and to whom each planning activity will be provided and the frequency with which the activities will be provided. Identify which staff positions will have a role in the delivery of the planning activity. Attach staff position descriptions. Discuss how the proposed activity relates to a comprehensive plan to provide the planning activity over an extended period, including financial support.
   b. Indicate the primary objectives of the planning activity to be provided. Describe collaboration and strategic partners within the County. How will proposed activity enhance or differ from existing activities now being provided by other agencies in your targeted population.
   c. Indicate whether the project is a new planning activity not previously funded by the County, or a supplement to an existing activity. If supplementing an existing planning activity, discuss how the project will increase the level of activities currently being provided. Indicate whether the activity is currently supported or was previously supported (in the 12 months prior to the application due date) with any other source of County funds. If so, explain and list sources. Discuss the status of those funds and why CDBG funds are now being sought.

2. Project Location:
   a. Identify the location from where the planning activity will be delivered (i.e. street address) and include a map that clearly identifies this location. Indicate client’s accessibility to onsite locations within the
County. Describe the targeted geographic area in which the service will be provided and include a map that clearly delineates the targeted area.

b. Indicate if the planning activity is located in or will have any impact on the following:
   (i) National Register Historic District
   (ii) 100 Year Floodplain
   (iii) Designated Wetlands Area

c. Identify if the location of the activity is located in any of the following municipalities: Abington Township, Conshohocken Borough, Limerick Township, Lower Merion Township, Marlborough Township, or Norristown Municipality.

   (i) If the planning activity is located in any one of these municipalities, you must discuss your agency’s promotional procedures and strategies for the services. You must demonstrate that these procedures endeavor to draw clients from the urban county.

3. Project Benefit:

   a. Planning activities which consist of data gathering, studies, analysis, preparation of plans and the identification of actions that will implement such plans. {24 CFR 570.205, 570.206 and 570.208(d)(4)}

   b. Policy-planning-management-capacity building activities, which enable a recipient to determine its needs, set goals and objectives, and devise, evaluate, and carry out projects and activities.

OTHER PROGRAM REQUIREMENTS - Please note that these requirements will need to be addressed if the removal of architectural barrier activity is funded. See Section VII for complete details.

570.602 Section 109 of the Act. --Non-discrimination
570.607 Employment and Contracting Opportunities
570.609 Use of Debarred, Suspended or Ineligible Contractors or Subrecipients
570.611 Conflict of Interest
The following instructions should be used by all applicants seeking grant assistance under these Federal Programs (CDBG, ESG). The Department of Housing and Community Development may request more specific project-related information from an applicant at any time during the review process.

The applicant must provide a complete description, a detailed budget (Page 7) for the proposed project in the application, and include the appropriate sources and uses form for all funds expected to be available. The application information is the basis for funding consideration. Use the appropriate application form as provided in the “Worksheet” section in the on-line application. Applications must contain all available documentation, which supports the eligibility, feasibility, marketability, and affordability of the proposed projects.

MATCHING FUNDS REQUIREMENT

MUNICIPALITIES
For municipal construction projects, CDBG will reimburse up to 100% of the total construction costs. The municipality will pay any engineering costs as matching funds.

NON-PROFIT ORGANIZATIONS
For CDBG grants a match of funds equal to a minimum of 30% of the project cost is required for non-profit applicants for each proposed project. An exception is allowed for construction projects whereby the applicant has the option to pay all engineering/architectural costs on the project utilizing its own funds. In this case the applicant is required to pay a minimum of 15% of construction costs and can request grant assistance for the remaining 85% of construction costs. The applicant must indicate its option by checking the appropriate box on one of the 2016 Sources and Uses forms contained in this section. For ESG grants a match of 100% is required.

Incomplete, insufficient, or missing information will cause applications to be eliminated from consideration. Please submit typewritten applications on 8 ½ x 11” paper. Each application must contain page numbers and a table of contents. All pages should be three-hole punched along the left margin and clipped into a manila folder. Include the agency name and project name at the top right hand corner of each page of the application.

Only one project application will be accepted from any one municipality and three applications from any one nonprofit organization. The original and one photocopy of the application must be submitted to the Office of Housing and Community Development.

APPLICATIONS MUST BE RECEIVED IN THE OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT BY 4:15 P.M., MONDAY, APRIL 16, 2018. NOTE: TRANSMITTALS VIA FACSIMILE (FAX) MACHINE or E-MAIL WILL NOT BE ACCEPTED.
### Checklist of Required Documents

All applicants must include: (Check each as included in application)

1. [ ] Application Cover Sheet (This Page)
2. [ ] Application Forms - See Section IV for complete details.
3. [ ] 2018 Sources and Uses Form corresponding to project.
4. [ ] 2018 Detailed Project Costs Form with indication of items to be supported by grant.
5. [ ] Certification and Assurances (Section V) - Signed - **NOTE THE UPDATED CHANGES**
6. [ ] Copy of Board Resolution or Meeting Minutes with authorization to request funds.
7. [ ] Map showing location of activity and/or street boundary lines of project (as applicable).
8. [ ] Digital photos of building/project front and back of structure/views from four points for proposed acquisition, rehabilitation or construction projects, streets showing deterioration etc.
9. [ ] Include an original and a copy of the entire application, each in a labeled manila folder.

In addition to Items 1 through 9 above, all Nonprofit Organizations must include the following:

1. [ ] Certification of nonprofit status (Letter from IRS 501 (c)(3))
2. [ ] Articles of Incorporation
3. [ ] By - Laws
4. [ ] List of current Board of Directors and Officers
5. [ ] Copy of Board Resolution or Meeting Minutes with Authorization to Request Funds
6. [ ] Organizational Chart
7. [ ] Annual Operating Budget
8. [ ] Most recent financial statement and audit
9. [ ] Copy of Deed for the property being rehabilitated (as applicable)
10. [ ] A copy of all in-take documentation used to determine client income.
11. [ ] Job Descriptions of requested staff positions, if any. Identify eligible duties.

**NOTE:** Homeless Applications Must include all attachments noted on the application form.

12. [ ] Attach the Emergency Shelter Minimum Shelter Habitability and Lead Based Paint form (as applicable)
### Sources and Uses: Municipal Construction Project

**1) Municipality Name**

**2) Project Name**

**3) Chief Elected Official of Applicant/Authority Chairperson**
   (Name, Title, Address, Zip Code, Phone)

**4) Contact Person**
   (Name, Title, Address, Zip Code)

   Contact E-mail:
   Contact Phone:

**5) Source of Funds**

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>FUNDING STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. County Funds Requested</strong></td>
<td></td>
</tr>
<tr>
<td><strong>B. Sources of Match</strong></td>
<td>NOTE: For Municipal construction projects CDBG will reimburse up to 100% of the total construction costs. Municipality will pay any engineering costs as matching funds.</td>
</tr>
<tr>
<td>1. Other Federal Funds</td>
<td>Secured □ Pending □</td>
</tr>
<tr>
<td>Date Secured □ Date Applied □</td>
<td></td>
</tr>
<tr>
<td>2. State Funds</td>
<td>Secured □ Pending □</td>
</tr>
<tr>
<td>Date Secured □ Date Applied □</td>
<td></td>
</tr>
<tr>
<td>3. Local Funds</td>
<td>Secured □ Pending □</td>
</tr>
<tr>
<td>Date Secured □ Date Applied □</td>
<td></td>
</tr>
<tr>
<td>4. Other (Specify)</td>
<td>Secured □ Pending □</td>
</tr>
<tr>
<td>Date Secured □ Date Applied □</td>
<td></td>
</tr>
</tbody>
</table>
| **C. Total Match Funds**
   (Sum of lines B1 to B4 above) | NOTE: Must provide copies of commitment letters for each match source indicated as secured. |
| **TOTAL SOURCES OF FUNDS**
   (Sum of lines A and C above) | |

**6) Uses Funds**

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Acquisition Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Architectural/Engineering</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Construction Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Reconstruction Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Rehabilitation Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Legal/Soft Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Other (Explain)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
</tr>
</tbody>
</table>

To the best of my knowledge and belief, data in the proposal are true and correct, submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&CD to do so.

__________________________
Signature  
CEO/Chairperson/President  
Date
Montgomery County
Department of Housing and Community Development

2018
SOURCES AND USES:
Non-Profit Construction Project

1) Agency Name

2) Project Name

3) Chief Elected Official of Applicant/Authority Chairperson/Nonprofit President (Name, Title, Address, Zip Code, Phone)

4) Contact Person (Name, Title, Address, Zip Code)

Contact E-mail:
Contact Phone:

5) SOURCE OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>FUNDING STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

A. County Funds Requested

B. Sources of Match (Federal, State, Local, Private)

NOTE: For Non-profit construction projects CDBG will reimburse up to 70% of the total construction costs including engineering costs or up to 85% of non-engineering construction costs. Please check the reimbursement level that your organizations’ request will be based upon. (Check One) □ 70% □ 85%

1. Other Federal Funds

2. State Funds

3. Local Funds

4. Other (Specify)

C. Total Match Funds (Sum of lines B1 to B4 above)

TOTAL SOURCES OF FUNDS (Sum of lines A and C above)

6) USES OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Acquisition Costs
Architectural/Engineering
Construction Costs
Reconstruction Costs
Rehabilitation Costs
Legal/Soft Costs
Other (Explain)

TOTAL

To the best of my knowledge and belief, data in the proposal are true and correct, submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&CD to do so.

__________________________
Signature                                            CEO/Chairperson/President                                                                                             Date
### SOURCES AND USES:

#### Public Service Projects

#### 1) Agency Name

#### 2) Project Name

#### 3) Chief Elected Official of Applicant/Authority Chairperson/Nonprofit President (Name, Title, Address, Zip Code, Phone)

#### 4) Contact Person (Name, Title, Address, Zip Code)

Contact E-mail: 
Contact Phone:

#### 5) SOURCE OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>FUNDING STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. County Funds Requested</strong></td>
<td></td>
</tr>
<tr>
<td><strong>B. Sources of Match (Federal including FEMA, State, Local, Private)</strong></td>
<td><strong>NOTE:</strong> For Non-construction projects CDBG will reimburse up to 70% of the total costs. Subrecipient must pay a minimum of 30% of project costs as match.</td>
</tr>
<tr>
<td>1. Other Federal Funds</td>
<td>Secured □ Pending □ Date Secured ______ Date Applied ______</td>
</tr>
<tr>
<td>2. State Funds</td>
<td>Secured □ Pending □ Date Secured ______ Date Applied ______</td>
</tr>
<tr>
<td>3. Local Funds</td>
<td>Secured □ Pending □ Date Secured ______ Date Applied ______</td>
</tr>
<tr>
<td>4. Other (Specify)</td>
<td>Secured □ Pending □ Date Secured ______ Date Applied ______</td>
</tr>
<tr>
<td><strong>C. Total Match Funds (Sum of lines B1 to B4 above)</strong></td>
<td><strong>NOTE:</strong> Must provide copies of commitment letters for each match source indicated as secured.</td>
</tr>
<tr>
<td><strong>TOTAL SOURCES OF FUNDS (Sum of lines A and C above)</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### 6) USES OF FUNDS

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seniors’ Services</td>
<td></td>
</tr>
<tr>
<td>Child Care Services</td>
<td></td>
</tr>
<tr>
<td>Legal Services</td>
<td></td>
</tr>
<tr>
<td>Youth Services</td>
<td></td>
</tr>
<tr>
<td>Other Public Services (Explain):</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
</tr>
</tbody>
</table>

To the best of my knowledge and belief, data in the proposal are true and correct, submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&CD to do so.

__________________________  ____________________________
Signature  CEO/Chairperson/President  Date
### SOURCES AND USES: Homeless Projects

1) **Agency Name**

2) **Project Name**

3) **Chief Elected Official of Applicant/Authority Chairperson/Nonprofit President**
   (Name, Title, Address, Zip Code, Phone)

4) **Contact Person**
   (Name, Title, Address, Zip Code)

   - Contact E-mail: 
   - Contact Phone: 

5) **SOURCE OF FUNDS**

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>FUNDING STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. County Funds Requested</strong></td>
<td></td>
</tr>
</tbody>
</table>
   | **B. Sources of Match**
   (Federal including FEMA, State, Local, Private) |
   | NOTE: For homeless projects the subrecipient must show a 100% match for the funds being requested. |

   - 1. Other Federal Funds
   - 2. State Funds
   - 3. Local Funds
   - 4. Other (Specify)

   **C. Total Match Funds**
   (Sum of lines B1 to B4 above)

   **TOTAL SOURCES OF FUNDS**
   (Sum of lines A and C above)

   - NOTE: Must provide copies of commitment letters for each match source indicated as secured.

6) **USES OF FUNDS**

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>COMMENTS/ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rapid Re-Housing Subsidies</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Prevention Subsidies</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Case Management</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Homeless Shelter Operations</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Homeless Essential Services</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Other (Explain)</strong></td>
<td></td>
</tr>
</tbody>
</table>

   **TOTAL**

To the best of my knowledge and belief, data in the proposal are true and correct, submission of the proposal has been duly authorized by the governing body, and the governing body has agreed to execute required certifications, statements of assurances and contracts if selected by MCH&CD to do so.

__________________________
Signature

__________________________
CEO/Chairperson/President

__________________________
Date
PROVIDE A DETAILED AND ACCURATE COST ESTIMATE. INDICATE ALL COSTS ASSOCIATED WITH THE PROJECT INCLUDING THOSE NOT FINANCED WITH COUNTY FUNDS. IDENTIFY WHICH COST LINE ITEMS ARE TO BE SUPPORTED BY COUNTY FUNDS.

<table>
<thead>
<tr>
<th>Positions/Salaries</th>
<th>Project Costs:</th>
<th>Costs to be Supported:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assistant Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Case Managers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other staff</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Employee Benefits:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FICA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Staff Benefits</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Agency Expenses:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shelter Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insurance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Supplies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial Assistance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office Supplies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building Maintenance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building Repairs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counseling Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>$</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$</strong></td>
<td></td>
</tr>
</tbody>
</table>

Name of Estimator: ____________________________ Date of Estimate: ____________________________
<table>
<thead>
<tr>
<th>1) Agency Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2) Project Name:</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Provide a detailed and accurate cost estimate. Indicate all costs associated with the project including those not financed with county funds. Identify which cost line items are to be supported by county funds.

| Name of Estimator: | Date of Estimate: |
## DETAILED PROJECT COST FORM
For Municipal and Public Facilities

1) Agency Name: 

<table>
<thead>
<tr>
<th>2) Project Name:</th>
<th>Contact Person:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Contact Phone Number:</td>
</tr>
<tr>
<td></td>
<td>Contact e-mail:</td>
</tr>
</tbody>
</table>

PROVIDE A DETAILED AND ACCURATE COST ESTIMATE. INDICATE ALL COSTS ASSOCIATED WITH THE PROJECT INCLUDING THOSE NOT FINANCED WITH COUNTY FUNDS. IDENTIFY WHICH COST LINE ITEMS ARE TO BE SUPPORTED BY COUNTY FUNDS.

<table>
<thead>
<tr>
<th>Source of Estimate:</th>
<th>Date of Estimate:</th>
</tr>
</thead>
</table>
§ 570.200 (j) Equal participation of faith-based organizations.

The HUD program requirements in §5.109 of this title apply to the CDBG program, including the requirements regarding disposition and change in use of real property by a faith-based organization.

24 CFR 5.109 Equal participation of faith-based organizations in HUD programs and activities.

(a) Purpose. Consistent with Executive Order 13279 (issued on December 12, 2002, 67 FR 77141), entitled “Equal Protection of the Laws for Faith-Based and Community Organizations,” as amended by Executive Order 13559 (issued on November 17, 2010, 75 FR 71319), entitled “Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations,” this section describes requirements for ensuring the equal participation of faith-based organizations in HUD programs and activities. These requirements apply to all HUD programs and activities, including all of HUD’s Native American Programs, except as may be otherwise noted in the respective program regulations in title 24 of the Code of Federal Regulations (CFR), or unless inconsistent with certain HUD program authorizing statutes.

(b) Definitions. The following definitions apply to this section:

Direct Federal financial assistance means Federal financial assistance provided when a Federal Government agency or an intermediary, as defined in this section, selects the provider and either purchases services from that provider (i.e., via a contract) or awards funds to that provider to carry out an activity (e.g., via grant, subgrant, sub-award, or cooperative agreement). The recipients of sub-grants or sub-awards that receive Federal financial assistance through State-administered programs (e.g., flow-through programs) are considered recipients of direct Federal financial assistance. In general, Federal financial assistance shall be treated as direct, unless it meets the definition of indirect Federal financial assistance.

Federal financial assistance means assistance that non-Federal entities receive or administer in the forms of grants, contracts, loans, loan guarantees, property, cooperative agreements, food commodities, direct appropriations, or other assistance, but does not include a tax credit, deduction, or exemption.

Indirect Federal financial assistance means Federal financial assistance provided when the choice of the provider is placed in the hands of the beneficiary, and the cost of that service is paid through a voucher, certificate, or other similar means of Government-funded payment. Federal financial assistance provided to an organization is considered indirect when the Government program through which the beneficiary receives the voucher, certificate, or other similar means of Government-funded payment is neutral toward religion; the organization receives the assistance as a result of a decision of the beneficiary, not a decision of the Government; and the beneficiary has at least one adequate secular option for the use of the voucher, certificate, or other similar means of Government-funded payment.

Intermediary means an entity, including a nongovernmental organization, acting under a contract, grant, or other agreement with the Federal Government or with a State, tribal or local government that accepts Federal financial assistance and distributes that assistance to other entities that, in turn, carry out activities under HUD programs.

(c) Equal participation of faith-based organizations in HUD programs and activities. Faith-based organizations are eligible, on the same basis as any other organization, to participate in HUD programs and activities. Neither the Federal Government, nor a State, tribal or local government, nor any other entity that administers any HUD program or activity, shall discriminate against an organization on the basis of the organization’s religious character or affiliation, or lack thereof. In addition, decisions about awards of Federal financial assistance must be free from political interference or even the appearance of such interference and must be made on the basis of merit, not based on the religious character or affiliation, or lack thereof, of an organization.

(d) Separation of explicitly religious activities from direct Federal financial assistance.

(1) A faith-based organization that applies for, or participates in, a HUD program or activity supported with Federal financial assistance retains its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance that it receives (e.g., via contract, grant, sub-grant, sub-award or cooperative agreement) to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law.
A faith-based organization that receives direct Federal financial assistance may use space (including a sanctuary, chapel, prayer hall, or other space) in its facilities (including a temple, synagogue, church, mosque, or other place of worship) to carry out activities under a HUD program without removing religious art, icons, scriptures, or other religious symbols. In addition, a faith-based organization participating in a HUD program or activity retains its authority over its internal governance, and may retain religious terms in its organization’s name, select its board members on a religious basis, and include religious references in its organization’s mission statements and other governing documents.

(e) **Explicitly religious activities.** If an organization engages in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), the explicitly religious activities must be offered separately, in time or location, from the programs or activities supported by direct Federal financial assistance and participation must be voluntary for the beneficiaries of the programs or activities that receive direct Federal financial assistance.

(f) **Intermediary responsibilities to ensure equal participation of faith-based organizations in HUD programs.** If an intermediary—acting under a contract, grant, or other agreement with the Federal Government or with a State, tribal or local government that is administering a program supported by Federal financial assistance—is given the authority to select a nongovernmental organization to receive Federal financial assistance under a contract, grant, sub-grant, sub-award, or cooperative agreement, the intermediary must ensure that such organization complies with the requirements of this section. If the intermediary is a nongovernmental organization, it retains all other rights of a nongovernmental organization under the program’s statutory and regulatory provisions.

(g) **Beneficiary protections.** Faith-based organizations that carry out programs or activities with direct Federal financial assistance from HUD must give written notice to beneficiaries and prospective beneficiaries of the programs or activities describing certain protections available to them, as provided in this subsection. In addition, if a beneficiary or prospective beneficiary objects to the religious character of the organization carrying out the programs or activities, that organization must promptly undertake reasonable efforts to identify and refer the beneficiary or prospective beneficiary to an alternative provider to which the beneficiary or prospective beneficiary has no such objection.

(1) **Written notice.** The written notice must state that:

(i) The organization may not discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice;

(ii) The organization may not require beneficiaries to attend or participate in any explicitly religious activities that are offered by the organization, and any participation by beneficiaries in such activities must be purely voluntary;

(iii) The organization must separate, in time or location, any privately funded explicitly religious activities from activities supported by direct Federal financial assistance;

(iv) If a beneficiary objects to the religious character of the organization, the organization must promptly undertake reasonable efforts to identify and refer the beneficiary to an alternative provider to which the beneficiary has no such objection; and

(v) Beneficiaries or prospective beneficiaries may report an organization’s violation of these protections, including any denial of services or benefits by an organization, by contacting or filing a written complaint to HUD or the intermediary, if applicable.

(2) **Timing of notice.** The written notice must be given to prospective beneficiaries before they enroll in any HUD program or activity. When the nature of the program or activity or exigent circumstances make it impracticable to provide the written notice in advance, the organization must provide written notice to beneficiaries of their protections at the earliest available opportunity.

(3) **Referral requirements.** (i) If a beneficiary or prospective beneficiary of a program or activity that receives direct Federal financial assistance from HUD objects to the religious character of an organization that carries out the program or activity, that organization must promptly undertake reasonable efforts to identify and refer the beneficiary or prospective beneficiary to an alternative provider to which the beneficiary or prospective beneficiary has no such objection.

(ii) A referral may be made to another faith-based organization, if the beneficiary or prospective beneficiary has no objection to that provider based on the provider’s religious character. But if the beneficiary or prospective beneficiary requests a secular provider, and a secular provider is available, then a referral must be made to that provider.

(iii) Except for activities carried out by telephone, Internet, or similar means, the referral must be to an alternative provider that is in reasonable geographic proximity to the organization making the referral and that
§ 570.503 (b)(7) Reversion of assets
The agreement shall specify that upon its expiration the subrecipient shall transfer to the recipient any CDBG funds on hand at the time of expiration and any accounts receivable attributable to the use of CDBG funds. It shall also include provisions designed to ensure that any real property under the subrecipient’s control that was acquired or improved in whole or in part with CDBG funds (including CDBG funds provided to the subrecipient in the form of a loan) in excess of $25,000 is either:

(i) used to meet one of the national objectives in §570.208 until five years after expiration of the agreement, or such longer period of time as determined appropriate by the recipient; or
(ii) Not used in accordance with paragraph (b)(7)(i) of this section, in which event the subrecipient shall pay to
the recipient an amount equal to the current market value of the property less any portion of the value
attributable to expenditures of non-CDBG funds for the acquisition of, or improvement to, the property. The
payment is program income to the recipient. (No payment is required after the period of time specified in
paragraph (b)(7)(i) of this section.)

§ 570.504 Program income
(a) Recording program income. The receipt and expenditure of program income as defined in § 570.500(a) shall be
recorded as part of the financial transactions of the grant program.

(b) Disposition of program income received by recipients.

(1) Program income received before to grant closeout may be retained by the recipient if the income is treated
as additional CDBG funds subject to all applicable requirements governing the use of CDBG funds.

(2) If the recipient chooses to retain program income, that program income shall be disposed of as follows:

(i) Program income in the form of repayments to, or interest earned on, a revolving fund as defined in §
570.500(b), shall be substantially disbursed from such fund before additional cash withdrawals are
made from the U.S. Treasury for the same activity. (This rule does not prevent a lump sum
disbursement to finance the rehabilitation of privately owned properties as provided for in § 570.513.)

(ii) Substantially all other program income shall be disbursed for eligible activities before additional cash
withdrawals are made from the U.S. Treasury.

(3) Program income on hand at the time of closeout shall continue to be subject to the eligibility requirements in
subpart C and all other applicable provisions of this part until it is expended.

(4) Unless otherwise provided in any grant closeout agreement, and subject to the requirements of paragraph
(b)(5) of this section, income received after closeout shall not be governed by the provisions of this part,
except that, if at the time of closeout the recipient has another ongoing CDBG grant received directly from
HUD, funds received after closeout shall be treated as program income of the ongoing grant program.

(5) If the recipient does not have another ongoing grant received directly from HUD at the time of closeout,
income received after closeout from the disposition of real property or from loans outstanding at the time
of closeout shall not be governed by the provisions of this part, except that such income shall be used for
activities that meet one of the national objectives in §570.208 and the eligibility requirements described in
section 105 of the Act.

(c) Disposition of program income received by subrecipients. The written agreement between the recipient and the
subrecipient, as required by § 570.503, shall specify whether program income received is to be returned to
the recipient or retained by the subrecipient. Where program income is to be retained by the subrecipient, the
agreement shall specify the activities that will be undertaken with the program income and that all provisions of
the written agreement shall apply to the specified activities. When the subrecipient retains program income,
transfers of grant funds by the recipient to the subrecipient shall be adjusted according to the principles
described in paragraphs (b)(2)(i) and (ii) of this section. Any program income on hand when the agreement
expires, or received after the agreement's expiration, shall be paid to the recipient as required by §570.503(b)(8).

(d) Disposition of certain program income received by urban counties. Program income derived from urban county
program activities undertaken by or within the jurisdiction of a unit of general local government which thereafter
terminates its participation in the urban county shall continue to be program income of the urban county. The
urban county may transfer the program income to the unit of general local government, upon its termination of
urban county participation, provided that the unit of general local government has become an entitlement
grantee and agrees to use the program income in its own CDBG entitlement program.

§ 570.505 Use of Real Property
The standards described in this section apply to real property within the recipient's control which was acquired or improved in whole or in part using CDBG funds in excess of $25,000. These standards shall apply from the date CDBG funds are first spent for the property until five years after closeout of an entitlement recipient's participation in the entitlement CDBG program or, with respect to other recipients, until five years after the closeout of the grant from which the assistance to the property was provided.

(a) A recipient may not change the use or planned use of any such property (including the beneficiaries of such use) from that for which the acquisition or improvement was made unless the recipient provides affected citizens with reasonable notice of, and opportunity to comment on, any such proposed change, and either:

(1) The new use of such property qualifies as meeting one of the national objectives in §570.208 and is not a building for the general conduct of government; or

(2) The requirements in paragraph (b) are met.

(b) If the recipient determines, after consultation with affected citizens, that it is appropriate to change the use of the property to a use which does not qualify under paragraph (a)(1) of this section, it may retain or dispose of the property for the changed use if the recipient's CDBG program is reimbursed in the amount of the current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, and improvements to, the property.

(c) If the change of use occurs after closeout, the provisions governing income from the disposition of the real property in §570.504(b)(4) or (5), as applicable, shall apply to the use of funds reimbursed.

(d) Following the reimbursement of the CDBG program in accordance with paragraph (b) of this section, the property no longer will be subject to any CDBG requirements.

§ 570.600 General
(a) This subpart K enumerates laws that the Secretary will treat as applicable to grants made under section 106 of the Act, other than grants to states made pursuant to section 106(d) of the Act, for purposes of the Secretary's determinations under section 104(e)(1) of the Act, including statutes expressly made applicable by the Act and certain other statutes and Executive Orders for which the Secretary has enforcement responsibility. This subpart K applies to grants made under the Insular Areas Program in §570.405 and §570.440 with the exception of §570.612. The absence of mention herein of any other statute for which the Secretary does not have direct enforcement responsibility is not intended to be taken as an indication that, in the Secretary's opinion, such statute or Executive Order is not applicable to activities assisted under the Act. For laws that the Secretary will treat as applicable to grants made to states under section 106(d) of the Act for purposes of the determination required to be made by the Secretary pursuant to section 104(e)(2) of the Act, see §570.487.

(b) This subpart also sets forth certain additional program requirements which the Secretary has determined to be applicable to grants provided under the Act as a matter of administrative discretion.

(c) In addition to grants made pursuant to section 106(b) and 106(d)(2)(B) of the Act (subparts D and F, respectively), the requirements of this subpart K are applicable to grants made pursuant to sections 107 and 119 of the Act (subparts E and G, respectively), and to loans guaranteed pursuant to subpart M.

§ 570.601 Public Law 88-352 and Public Law 90-284; affirmatively furthering fair housing; Executive Order 11063
Section 104(b) of the Act provides that any grant under section 106 of the Act shall be made only if the grantee certifies to the satisfaction of the Secretary that the grant "will be conducted and administered in conformity with Public Law 88-352 and Public Law 90-284 and the grantee will affirmatively further fair housing." Similarly, section 107 provides that no grant may be made under that section (Secretary's Discretionary Fund) or section 119 (UDAG) without satisfactory assurances that the grantee's program will be conducted and administered in conformity with Public Law 88-352 and Public Law 90-284.

(a) "Public Law 88-352" refers to title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), which provides
that no person in the United States shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Section 602 of the Civil Rights Act of 1964 directs each Federal department and agency empowered to extend Federal financial assistance to any program or activity by way of grant to effectuate the foregoing prohibition by issuing rules, regulations, or orders of general applicability which shall be consistent with achievement of the statute authorizing the financial assistance. HUD regulations implementing the requirements of Title VI with respect to HUD programs are contained in 24 CFR Part 1.

(b) "Public Law 90-284" refers to the Fair Housing Act (42 U.S.C. 3601-3620), which states that it is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States and prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including otherwise making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, handicap or familial status. The Fair Housing Act further requires the Secretary to administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of the Fair Housing Act. In accordance with this statutory direction, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. Furthermore, section 104(b)(2) of the Act requires that each grantee receiving funds under section 106 of the Act (entitlement or small cities grantees) certify to the satisfaction of the Secretary that it will affirmatively further fair housing.

For each community receiving a grant under subpart D of this part, the certification that the grantee will affirmatively further fair housing shall specifically require the grantee to assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records reflecting the analysis and actions in this regard.

(c) Executive Order 11063, as amended by Executive Order 12259, directs the Department to take all action necessary and appropriate to prevent discrimination because of race, color, religion (creed), sex, or national origin, in the sale, leasing, rental, or other disposition of residential property and related facilities (including land to be developed for residential use), or in the use or occupancy thereof, if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants, or contributions agreed to be made by the Federal Government. HUD regulations implementing Executive Order 11063 are contained in 24 CFR Part 107.

§ 570.602 Section 109 of the Act
(a) Section 109 of the Act requires that no person in the United States shall on the ground of race, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community development funds made available pursuant to the Act. For purposes of this section "program or activity" is defined as any function conducted by an identifiable administrative unit of the recipient, or by any unit of government, subrecipient, or private contractor receiving community development funds or loans from the recipient. "Funded in whole or in part with community development funds" means that community development funds in any amount in the form of grants or proceeds from HUD guaranteed loans have been transferred by the recipient or a subrecipient to an identifiable administrative unit and disbursed in a program or activity. In subsection (b) of this section, "recipient" means recipient as defined in 24 CFR 1.2(f).

(b) Specific discriminatory actions prohibited and corrective actions.

(1) A recipient may not, under any program or activity to which the regulations of this part may apply, directly or through contractual or other arrangements, on the ground of race, color, national origin, or sex:

(i) Deny any individual any facilities, services, financial aid or other benefits provided under the program or activity.

(ii) Provide any facilities, services, financial aid or other benefits which are different, or are provided in a different form, from that provided to others under the program or activity.
(iii) Subject an individual to segregated or separate treatment in any facility in, or in any matter of process related to receipt of any service or benefit under the program or activity.

(iv) Restrict an individual in any way in access to, or in the enjoyment of, any advantage or privilege enjoyed by others in connection with facilities, services, financial aid or other benefits under the program or activity.

(v) Treat an individual differently from others in determining whether the individual satisfies any admission, enrollment, eligibility, membership, or other requirement or condition which the individual must meet in order to be provided any facilities, services or other benefit provided under the program or activity.

(vi) Deny an individual an opportunity to participate in a program or activity as an employee.

(2) A recipient may not use criteria or methods of administration which have the effect of subjecting persons to discrimination on the basis of race, color, national origin, or sex, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to persons of a particular race, color, national origin, or sex.

(3) A recipient, in determining the site or location of housing or facilities provided in whole or in part with funds under this part, may not make selections of such site or location which have the effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, national origin, or sex; or which have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act and of this section.

(4)

(i) In administering a program or activity funded in whole or in part with CDBG funds regarding which the recipient has previously discriminated against persons on the ground of race, color, national origin or sex, or if there is sufficient evidence to conclude that such discrimination existed, the recipient must take remedial affirmative action to overcome the effects of prior discrimination. The word "previously" does not exclude current discriminatory practices.

(ii) In the absence of discrimination, a recipient, in administering a program or activity funded in whole or in part with funds made available under this part, may take any nondiscriminatory affirmative action necessary to ensure that the program or activity is open to all without regard to race, color, national origin or sex.

(iii) After a finding of noncompliance or after a recipient has a firm basis to conclude that discrimination has occurred, a recipient shall not be prohibited by this section from taking action eligible under Subpart C to ameliorate an imbalance in services or facilities provided to any geographic area or specific group of persons within its jurisdiction, where the purpose of such action is to remedy prior discriminatory practice or usage.

(5) Notwithstanding anything to the contrary in this section, nothing contained herein shall be construed to prohibit any recipient from maintaining or constructing separate living facilities or rest room facilities for the different sexes. Furthermore, selectivity on the basis of sex is not prohibited when institutional or custodial services can properly be performed only by a member of the same sex as the recipients of the services.

(c) Section 109 of the Act further provides that any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified handicapped person as provided in section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) shall also apply to any program or activity funded in whole or in part with funds made available pursuant to the Act. HUD regulations implementing the Age Discrimination Act are contained in 24 CFR Part 146 and the regulations implementing section 504 are contained in 24 CFR Part 8.

§ 570.603 Labor Standards

Section VII OTHER PROGRAM REQUIREMENTS
(a) Section 110(a) of the Act requires that all laborers and mechanics employed by contractors or subcontractors on construction work financed in whole or in part with assistance received under the Act shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276a - 276a-5). By reason of the foregoing requirement, the Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.) also applies. However, these requirements apply to the rehabilitation of residential property only if such property contains not less than 8 units. With respect to the labor standards specified in this section, the Secretary of Labor has the authority and functions set forth in Reorganization Plan Number 14 of 1950 (5 U.S.C. 1332-15) and section 2 of the Act of June 13, 1934, as amended (40 U.S.C. 276c).

(b) Under section 110(b) of the Act the requirements set out in paragraph (a) of this section are inapplicable to individuals who volunteer their services under certain circumstances. Grantees, subrecipients, contractor and subcontractors shall comply with 24 CFR part 70, which sets out the circumstances under which volunteers may be used.

§ 570.604 Environmental Standards
Section 104(g) expresses the intent that "the policies of the National Environmental Policy Act of 1969 and other provisions of law which further the purposes of such Act (as specified in regulations issued by the Secretary)...[be] most effectively implemented in connection with the expenditure of funds under" the Act. Such other provisions of law which further the purposes of the National Environmental Policy Act of 1969 are specified in regulations issued pursuant to section 104(g) of the Act and contained in 24 CFR Part 58. Section 104(g) also provides that, in lieu of the environmental protection procedures otherwise applicable, the Secretary may under regulations provide for the release of funds for particular projects to grantees who assume all of the responsibilities for environmental review, decision making, and action pursuant to the National Environmental Policy Act of 1969, and the other provisions of law specified by the Secretary as described above, that would apply to the Secretary were he/she to undertake such projects as Federal projects. Grantees assume such environmental review, decision making, and action responsibilities by execution of grant agreements with the Secretary. The procedures for carrying out such environmental responsibilities are contained in 24 CFR Part 58.

§ 570.605 National Flood Insurance Program
Section 202(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4106) provides that no Federal officer or agency shall approve any financial assistance for acquisition or construction purposes (as defined under section 3(a) of said Act (42 U.S.C. 400(a)), one year after a community has been formally notified of its identification as a community containing an area of special flood hazard, for use in any area that has been identified by the Director of the Federal Emergency Management Agency as an area having special flood hazards unless the community in which such area is situated is then participating in the National Flood Insurance Program. Notwithstanding the date of HUD approval of the recipient's application (or, in the case of grants made under Subpart D, the date of submission of the grantee's consolidated plan in accordance with 24 CFR part 91), funds provided under this part shall not be expended for acquisition or construction purposes in an area that has been identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards unless the community in which the area is situated is participating in the National Flood Insurance Program in accordance with 44 CFR Parts 59-79, or less than a year has passed since FEMA notification to the community regarding such hazards; and flood insurance is obtained in accordance with section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001).

§ 570.606 Displacement, Relocation, Acquisition and Replacement of Housing.
(a) General policy for minimizing displacement. Consistent with the other goals and objectives of this part, grantees shall assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of activities assisted under this part.

(b) Relocation assistance for displaced persons at URA levels.

(1) A displaced person shall be provided with relocation assistance at the levels described in, and in accordance with the requirements of, 49 CFR part 24 which contains the government-wide regulations implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U.S.C. 4601-4655).
(2) Displaced person.

(i) For purposes of this paragraph (b), the term "displaced person" means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of rehabilitation, demolition, or acquisition for an activity assisted under this part. A permanent involuntary move for an assisted activity includes a permanent move from real property that is made:

(A) After notice by the grantee to move permanently from the property, if the move occurs after the initial official submission to HUD for grant, loan, or loan guarantee funds under this part that are later provided or granted.

(B) After notice by the property owner to move permanently from the property, if the move occurs after the date of the submission of a request from financial assistance by the property owner (or person in control of the site) that is later approved for the requested activity.

(C) Before the date described in paragraph (b)(2)(i)(A) or (B) of this section, it either HUD or the grantee determines that the displacement directly resulted from acquisition, rehabilitation, or demolition for the requested activity.

(D) After the initiation of negotiations if the person is the tenant-occupant of a dwelling unit and any one of the following three situations occurs:

(1) The tenant has not been provided with a reasonable opportunity to lease and occupy a suitable decent, safe, and sanitary dwelling in the same building/complex upon the completion of the project under reasonable terms and conditions, including a monthly rent that does not exceed the greater of the tenant's monthly rent and estimated average utility costs before the initiation of negotiations or 30 percent of the household's average monthly gross income; or

(2) The tenant is required to relocate temporarily for the activity but

(i) The tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporary location and any increased housing costs, or other conditions of the temporary relocation are not reasonable and

(ii) the tenant does not return to the building/complex; or

(3) The tenant is required to move to another unit in the building/complex, but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move.

(ii) Notwithstanding the provisions of paragraph (b)(2)(i) of this section, the term "displaced person" does not include:

(A) A person who is evicted for cause based upon serious or repeated violations of material terms of the lease or occupancy agreement. To exclude a person on this basis, the grantee must determine that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance under this section;

(B) A person who moves into the property after the date of the notice described in paragraph (b)(2)(i)(A) or (B) of this section, but who received a written notice of the expected displacement before occupancy.

(C) A person who is not displaced as described in 49 CFR 24.2(g)(2).
(D) A person who the grantee determines is not displaced as a direct result of the acquisition, rehabilitation, or demolition for an assisted activity. To exclude a person on this basis, HUD must concur in that determination.

(iii) A grantee may, at any time, request HUD to determine whether a person is a displaced person under this section.

(3) Initiation of negotiations. For purposes of determining the type of replacement housing assistance to be provided under this paragraph, if the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of real property, the term “initiation of negotiations” means the execution of the grant or loan agreement between the grantee and the person owning or controlling the real property.

(c) Residential antidisplacement and relocation assistance plan. In accordance with section 104(d) of the Act, each grantee must adopt, make public, and certify that it is following a residential antidisplacement and relocation assistance plan providing one-for-one replacement units (paragraph (c)(1) of this section), and relocation assistance (paragraph (c)(2) of this section). The plan shall also indicate the steps that will be taken consistent with other goals and objectives of this part to minimize the displacement of families and individuals from their homes and neighborhoods as a result of any activity assisted under this part.

(1) One-for-one replacement of low/moderate income dwelling units.

   (i) All occupied and vacant occupiable low/moderate-income dwelling units that are demolished or converted to a use other than as low/moderate-income dwelling units in connection with an activity assisted under this part must be replaced with low/moderate income dwelling units.

   (ii) Replacement low/moderate income dwelling units may be provided by governmental agencies or private developer, and must meet the following requirements.

      (A) The units must be located within the grantee’s jurisdiction. To the extent feasible and consistent with other statutory priorities, the units shall be located within the same neighborhood as the units replaced.

      (B) The units must be sufficient in number and size to house no fewer than the number of occupants who could have been housed in the units that are demolished or converted. The number of occupants who could have been housed in units shall be determined in accordance with applicable local housing occupancy codes. The grantee may not replace those units with smaller units (e.g. 2-bedroom unit with two 1-bedroom units), unless the grantee has provided the information required under paragraph (c)(1)(iii)(G) of this section.

      (C) The units must be provided in standard condition. Replacement low/moderate income dwelling units may include units that have been raised to standard from substandard condition if

         (1) no person was displaced from the unit as a direct result of an assisted activity (see definition of displaced person in Paragraph (c)(3)(ii) of this section) and

         (2) the unit was vacant for at least three months before execution of the agreement between the grantee and the property owner.

      (D) The units must initially be made available for occupancy at any time during the period beginning one year before the grantee’s submission of the information required under paragraph (c)(1)(iii) of the section and ending three years after the commencement of the demolition or rehabilitation related to the conversion.

      (E) The units must be designed to remain low/moderate income dwelling units for at least 10 years from the date of initial occupancy. Replacement low/moderate-income dwelling units may include, but are not limited to, public housing, or existing housing receiving Section 8 project-based assistance under
the United States Housing Act of 1937.

(iii) Before the grantee enters into a contract committing it to provide funds under this part for any activity that will directly result in the demolition of low/moderate-income dwelling units or the conversion of low/moderate-income dwelling units to another use, the grantee must make public, and submit the following information in writing to HUD:

(A) A description of the proposed assisted activity;

(B) The location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low/moderate-income dwelling units as a direct result of the assisted activity;

(C) A time schedule for the commencement and completion of the demolition or conversion;

(D) The location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data are not available at the time of the general submission, the submission shall identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific location and number of dwelling units by size shall be submitted and disclosed to the public as soon as it is available.

(E) The source of funding and a time schedule for the provision of replacement dwelling units;

(F) The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy.

(G) Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g. 2-bedroom unit with two 1-bedroom units) is consistent with the needs analysis contained in the HUD-approved CHAS. A grantee that is not required to submit a Housing Assistance Plan to HUD must submit information demonstrating that the proposed replacement is consistent with the housing needs of low and moderate income households in the jurisdiction.

(iv) The one for one replacement requirements of paragraph (c)(1) of this paragraph does not apply to the extent Field Office determines, based upon objective data, that there is an adequate supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis within the grantee’s jurisdiction. In making this determination, the HUD will consider whether the demolition or conversion of the low/moderate income dwelling units will have a material impact on the ability of low and moderate income household to find suitable housing. HUD will consider relevant evidence of housing supply and demand including, but not limited to the following factors: the housing vacancy rate for the jurisdiction, the number of vacant low/moderate-income dwelling units in the jurisdiction (excluding units that will be demolished or converted) and the number of eligible families on waiting lists for housing assisted under the United States Housing Act of 1937 in the jurisdiction; the needs analysis contained in any applicable HUD-approved CHAS; and relevant part or predicted demographic changes.

(A) The one for one replacement requirements of paragraph (c)(1) of this paragraph does not apply to the extent Field Office determines, based upon objective data, that there is an adequate supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis within the grantee’s jurisdiction. In making this determination, the HUD will consider whether the demolition or conversion of the low/moderate income dwelling units will have a material impact on the ability of low and moderate income household to find suitable housing. HUD will consider relevant evidence of housing supply and demand including, but not limited to the following factors: the housing vacancy rate for the jurisdiction, the number of vacant low/moderate-income dwelling units in the jurisdiction (excluding units that will be demolished or converted) and the number of eligible families on waiting lists for housing assisted under the United States Housing Act of 1937 in the jurisdiction; the needs analysis contained in any applicable HUD-approved CHAS; and relevant part or predicted demographic changes.

(B) HUD may consider the supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis in an area that is larger than the grantee’s jurisdiction. Such additional dwelling units shall be considered if the Field Office determines that the units would be suitable to serve the needs of the low- and moderate income households that could be served by the low/moderate-income dwelling units that are to be demolished or converted to another use. HUD will base this determination on geographic and demographic factors, such as location and access to places of employment and to other facilities.

(C) The grantee must submit a request for a determination under paragraph (c)(1)(iv) directly to the Field
Office. Simultaneously with the submission of the request, the grantee must make the submission public and inform interested persons that they have 30 days from the date of submission to provide to HUD additional information supporting or opposing the request.

(2) Relocation assistance under section 104(d) of the Act. Under section 104(d), each displaced person (defined in paragraph (c)(3)(iii) of this section) is entitled to choose to receive either assistance at URA levels (see Paragraph (b) of this section) or the following relocation assistance:

(i) Advisory services at the levels described in 49 CFR Part 24, subpart C (General Relocation Requirements). Tenants shall be advised of their rights under the Fair Housing Act (42 U.S.C. 3601-19) and of replacement housing opportunities in such a manner that, to the extent feasible, will provide a choice between relocating within their neighborhoods and other neighborhoods consistent with the grantee’s responsibility to affirmatively further fair housing;

(ii) Payment for moving expenses at the levels described in 49 CFR Part 24, subpart D.

(iii) The reasonable and necessary cost of any security deposit required to rent the replacement dwelling unit, and for credit checks required to rent or purchase the replacement dwelling unit.

(iv) Interim living costs. The grantee shall reimburse a person for actual reasonable out-of-pocket costs incurred in connection with temporary relocation, including moving expenses and increased housing costs, if

(A) the person must relocate temporarily because continued occupancy of the dwelling unit constitutes a substantial danger to the health or safety of the person of the public, or

(B) the person is displaced from a low/moderate income dwelling unit, none of the comparable replacement dwelling units to which the person has been referred qualifies as a low/moderate income dwelling (defined in paragraph (c)(3)(iii) of this section), and a suitable low/moderate income dwelling unit is scheduled to become available in accordance with paragraph (c)(1) of this section. (Because a comparable replacement dwelling unit may be made affordable to a person through a rental assistance payment and its market rent may exceed the Fair Market Rent (FMR) under the Section 8 Existing Housing Program, it may not meet the definition of a low/moderate income dwelling unit.)

(v) Replacement housing assistance. Persons are eligible to receive one of the following two forms of replacement housing assistance:

(A) Each person must be offered rental assistance equal to 60 times the amount necessary to reduce the monthly rent and estimated average monthly cost of utilities for a replacement dwelling (comparable replacement dwelling or decent, safe, and sanitary replacement dwelling to which the person relocates, whichever costs less) to the Total Tenant Payment as determined under 813.107 of this title. All or a portion of this assistance may be offered through a certificate or housing voucher for rental assistance (if available) provided through the Local Public Agency (PHA) under Section 8 of the United States Housing Act of 1937. If a Section 8 certificate or housing voucher is provided to a person, the grantee must provide referrals to comparable replacement dwelling units where the owner is willing to participate in the section Existing Housing Program. To the extent that cash assistance is provided, it may, at the discretion of the grantee, be in either a lump sum or in installments.

(B) If the person purchases an interest in a housing cooperative or mutual housing association and occupies a decent, safe and sanitary unit in the cooperative or association, the household may elect to receive a lump sum payment. This lump sum payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the Total Tenant Payment as determined under 813.107 of this title, from the monthly rent and estimated average monthly cost of utilities at a comparable replacement dwelling To compute the capitalized value, the installments shall be discounted at the rate of interest paid on passbook savings deposits by a federally-insured bank or savings and loan institution conducting business within the grantee’s jurisdiction. To the extent...
necessary to minimize hardship to the household, the grantee shall, subject to appropriate safeguards, issue a payment in advance of the purchase of the interest in the housing cooperative or mutual housing association.

(C) Displaced low/moderate income tenants shall be advised of their right to elect relocation assistance pursuant to the Uniform Relocation Assistance and Real Property acquisition Policies Act of 1970 and the regulations appearing at 49 CFR part 24 as an alternative to the relocation assistance available under paragraph (c)(2) of this section.

(3) Definitions. For purposes of providing section 104(d) assistance under the paragraph (c):

(i) "Comparable replacement dwelling unit" The term "comparable replacement dwelling unit" means a dwelling unit that:

(A) Meets the criteria of 24 CFR 24.2(d)(1) through (6); and

(B) Is available at a monthly cost for rent plus estimated average monthly utility costs that does not exceed the "Total Tenant Payment" determined under §813.107 of this title, after taking into account any rental assistance the household would receive.

(ii) Displaced person.

(A) The term "displaced person" means any low/moderate income family or individual that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of the conversion of a low/moderate income dwelling unit (defined in paragraph (c)(3)(iv) of this section) or demolition in connection with an activity assisted under this part. A permanent involuntary move for an assisted activity includes a permanent move from real property that is made:

(1) After notice by the grantee to move permanently from the property, if the move occurs after the initial official submission to HUD for grant, loan, or loan guarantee funds under this part that are later provided or granted

(2) After notice by the property owner, to move permanently from the property, if the move occurs after the date of submission of a request for financial assistance by the property owner (or person in control of the site) that is later approved for the requested activity.

(3) Before the date described in paragraph (c)(3)(ii)(A)(1) or (2) of this section, If either HUD or the grantee determines that the displacement directly resulted from the conversion of a low/moderate-income dwelling unit or demolition in connection with the requested activity.

(4) After the execution of the agreement by the grantee covering the rehabilitation or demolition, If the person is the tenant-occupant of a dwelling unit and any one of the following three situations occurs:

(i) The tenant has not been provided with a reasonable opportunity to lease and occupy a suitable decent, safe, and sanitary dwelling in the same building/complex upon completion of the project, under reasonable terms and conditions, including a monthly rent that does not exceed the greater of the tenant's monthly rent and estimated average utility costs before the execution of such agreement, or the "Total Tenant payment" for the person as determined under §813.107 of this title; or

(ii) The tenant, required to relocate temporarily for the activity, does not return to the building/complex; and either the tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary location (including the cost of moving to and from the temporary location and any increased housing costs), or other conditions of the temporary relocation are not reasonable, or
(iii) The tenant is required to move to another unit in the building/complex, but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move.

(B) Notwithstanding the provisions of paragraph (c)(3)(ii)(A) of this section, the term "displaced person" does not include:

(I) A person who is evicted for cause based upon serious or repeated violations of material terms of the lease or occupancy agreement. To exclude a person on this basis, the grantee must determine that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance under this section.

(2) A person who moves into the property after the date of the notice described in paragraph (c)(3)(ii)(A) (1) or (2) of this section, but received a written notice of the expected displacement before commencing occupancy.

(3) A person who is not displaced as defined under 49 CFR 24.2.

(4) A person who the grantee determines is not displaced as a direct result of the conversion of a low/moderate-income dwelling or demolition in connection with an assisted activity. To exclude a person on this basis, HUD must concur in that determination.

(5) A grantee may, at any time request HUD to determine whether a person is a displaced person under this paragraph (c).

(iii) Low/moderate-income dwelling unit. The term low/moderate-income dwelling unit" means a dwelling unit with a market rent (including utility costs) that does not exceed the applicable Fair Market Rent (FMR) for existing housing established under 24 CFR Part 888, except that the term does not include a unit that is owned and occupied by the same person before and after the assisted rehabilitation.

(iv) Standard condition and substandard condition suitable for rehabilitation. If the grantee has a HUD-approved Consolidated Plan the definitions of "standard condition" and "substandard condition suitable for rehabilitation" established in the plan will apply.

(v) Vacant occupiable dwelling unit. The term vacant occupiable dwelling unit" means a vacant dwelling unit that is in a standard condition; a vacant dwelling unit that is in a substandard condition, but is suitable for rehabilitation, or a dwelling unit in any condition that has been occupied (except by a squatter) at any time with in the period beginning one year before the date of execution of the agreement by the grantee covering the rehabilitation or demolition.

(d) Optional relocation assistance.

Under section 105(a)(11) of the Act the grantee may provide relocation payments and other relocation assistance to persons displaced by activities that are not subject to paragraph (b) or (c) of this section. The grantee may also provide relocation assistance to persons receiving assistance under paragraphs (b) or (c) of this section at levels in excess of those required by these paragraphs. Unless such assistance is provided under State or local law, the grantee shall provide such assistance only upon the basis of a written determination that the assistance is appropriate (see 24 CFR 570.201(i)). The grantee must adopt a written policy available to the public that describes the relocation assistance that the grantee has elected to furnish and provides for equal relocation assistance within each class of displaced persons.

(e) Acquisition of real property.

The acquisition of real property for an assisted activity is subject to 49 CFR Part 24, subpart B.

(f) Appeals.
If a person disagrees with the grantee’s determination concerning the person's eligibility for, or the amount of, a relocation payment under this section, the person may file a written appeal of that determination with the grantee. The appeal procedures to be followed are described in 49 CFR 24.10. In addition, a low- or moderate-income household that has been displaced from a dwelling may file a written request for review of the grantee’s decision to the HUD Field Office.

(g) Responsibility of grantee.

(I) The grantee is responsible for ensuring compliance with the requirements of this section, notwithstanding any third party’s contractual obligation to the grantee to comply with the provisions of this section.

(2) The cost of assistance required under this section may be paid from local public funds, funds provided under this part, or funds available from other sources.

(3) The grantee must maintain records in sufficient detail to demonstrate compliance with the provisions of this section.

§ 570.607 Employment and Contracting Opportunities

(a) Grantees shall comply with Executive Order 11246, as amended by Executive Order 12086 and 12107, and the implementing regulations issued pursuant thereto (41 CFR Chapter 60) which provide that no person shall be discriminated against on the basis of race, color, religion, sex, or national origin in all phases of employment during the performance of Federal or federally assisted construction contracts. As specified in Executive Order 11246 and the implementing regulations, contractors and subcontractors on Federal or federally assisted construction contracts shall take affirmative action to ensure fair treatment in employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay, or other forms of compensation and selection for training and apprenticeship.

(b) Grantees shall comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and the implementing regulations in 24 CFR part 135. Section 3 requires that employment and other economic opportunities arising in connection with housing rehabilitation, housing construction, or other public construction projects, shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be given to low and very low income persons.

§ 570.608 Lead-based Paint

(a) Prohibition against the use of lead-based paint. Section 401(b) of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846) directs the Secretary to prohibit the use of lead-based paint in residential structures constructed or rehabilitated with Federal assistance. Such prohibitions are contained in 24 CFR Part 35, Subpart B, and are applicable to residential structures constructed or rehabilitated with assistance provided under this part.

(b) Notification of hazards of lead-based paint poisoning.

(1) The Secretary has promulgated requirements regarding notification to purchasers and tenants of HUD-associated housing constructed prior to 1978 of the hazards of lead-based paint poisoning at 24 CFR Part 35, Subpart A. This paragraph is promulgated pursuant to the authorization granted in 24 CFR 35.5(c) and supersedes, with respect to all housing to which it applies, the notification requirements prescribed by Subpart A of 24 CFR Part 35.

(2) For properties constructed prior to 1978, applicants for rehabilitation assistance provided under this part and tenants or purchasers of properties owned by the grantee or its subrecipient and acquired or rehabilitated with assistance provided under this part shall be notified:

(i) That the property may contain lead-based paint;

(ii) of the hazards of lead-based paint;
(iii) of the symptoms and treatment of lead-based poisoning;

(iv) of the precautions to be taken to avoid lead-based paint poisoning (including maintenance and removal techniques for eliminating such hazards);

(v) of the advisability and availability of blood lead level screening for children under seven years of age; and

(vi) that in the event lead-based paint is found on the property, appropriate abatement procedures may be undertaken.

(c) Elimination of lead-based paint hazards. The purpose of this paragraph is to implement the provisions of section 302 of the Lead-Based Paint Poisoning Prevention Act, 42 U.S.C. 4822, by establishing procedures to eliminate as far as practicable the hazards due to the presence of paint which may contain lead and to which children under seven years of age may be exposed in existing housing which is rehabilitated with assistance provided under this part. The Secretary has promulgated requirements regarding the elimination of lead-based paint hazards in HUD-associated housing at 24 CFR Part 35, Subpart C. This paragraph is promulgated pursuant to the authorization granted in 24 CFR 35.24(b)(4) and supersedes, with respect to all housing to which it applies, the requirements prescribed by Subpart C of 24 CFR Part 35.

(1) Applicability. This paragraph applies to the rehabilitation of applicable surfaces in existing housing which is assisted under this part. The following activities assisted under the Community Development Block Grant program are not covered by this paragraph:

(i) Emergency repairs (not including lead-based paint-related emergency repairs);

(ii) weatherization;

(iii) water or sewer hook-ups;

(iv) installation of security devices;

(v) facilitation of tax exempt bond issuances which provide funds for rehabilitation;

(vi) other similar types of single-purpose programs that do not include physical repairs or remodeling of applicable surfaces (as defined in 24 CFR 35.22) of residential structures; and

(vii) any non-single purpose rehabilitation that does not involve applicable surfaces (as defined in 24 CFR 35.22) that does not exceed $3,000 per unit.

(2) Definitions. - Applicable surface. All intact and nonintact interior and exterior painted surfaces of a residential structure.

Chewable surface. All chewable protruding painted surfaces up to five feet from the floor or ground, which are readily accessible to children under seven years of age, e.g., protruding corners, window sills and frames, doors and frames, and other protruding woodwork.

Defective paint surface. Paint on applicable surfaces that is cracking, scaling, chipping, peeling or loose

Elevated blood lead level or EBL. Excessive absorption of lead, that is, a confirmed concentration of lead in whole blood of 25 ug/dl (micrograms of lead per deciliter of whole blood) or greater.

Lead-based paint surface. A paint surface, whether or not defective, identified as having a lead content greater than or equal to 1 mg/cm2

(3) Inspection and Testing

(i) Defective paint surfaces. The grantee shall inspect for defective paint surfaces in all units constructed prior
to 1978 which are occupied by families with children under seven years of age and which are proposed for rehabilitation assistance. The inspection shall occur at the same time the property is being inspected for rehabilitation. Defective paint conditions will be included in the work write-up for the remainder of the rehabilitation work.

(ii) Chewable surfaces. The grantee shall be required to test the lead content of chewable surfaces if the family residing in a unit, constructed prior to 1978 and receiving rehabilitation assistance, includes a child under seven years of age with an identified EBL condition. Lead content shall be tested by using an X-ray fluorescence analyzer (XRF) or other method approved by HUD. Test readings of 1 mg/cm² or higher using an XRF shall be considered positive for presence of lead-based paint.

(iii) Abatement without testing. In lieu of the procedures set forth in paragraph (c) (3) (ii) of this section, in the case of a residential structure constructed prior to 1978, the grantee may forgo testing and abate all applicable surfaces in accordance with the methods set out in 24 CFR 35.24(b) (2) (ii).

(4) Abatement Actions.

(i) For inspections performed under § 570.608(c) (3) (i) and where defective paint surfaces are found, treatment shall be provided to defective areas. Treatment shall be performed before final inspection and approval of the work.

(ii) For testing performed under § 570.608(c) (3) (ii) and where interior chewable surfaces are found to contain lead-based paint, all interior chewable surfaces in any affected room shall be treated. Where exterior chewable surfaces are found to contain lead-based paint, the entire exterior chewable surface shall be treated. Treatment shall be performed before final inspection and approval of the work.

(iii) When weather prohibits repainting exterior surfaces before final inspection, the grantee may permit the owner to abate the defective paint or chewable lead-based paint as required by this section and agree to repaint by a specified date. A separate inspection is required.

(5) Abatement methods. At a minimum, treatment of the defective areas and chewable lead-based paint surfaces shall consist of covering or removal of the painted surface as described in 24 CFR 35.24(b)(2)(ii).

(6) Funding for inspection, testing and abatement. Program requirements and local program design will determine whether the cost of inspection, testing or abatement is to be borne by the owner/developer, the grantee or a combination of the owner/developer and the grantee.

(7) Tenant protection. The owner/developer shall take appropriate action to protect tenants from hazards associated with abatement procedures. Where necessary, these actions may include the temporary relocation of tenants during the abatement process. The owner/developer shall notify the grantee of all such actions taken.

(8) Records. The grantee shall keep a copy of each inspection and/or test report for at least three years.

(9) Monitoring and enforcement. HUD field office monitoring of rehabilitation programs includes reviews for compliance with applicable program requirements for lead-based paint. The CPD Field Monitoring Handbook which currently includes instructions for monitoring lead-based paint requirements will be amended as appropriate. In cases of noncompliance, HUD may impose conditions or sanctions on grantees to encourage prompt compliance.

(10) Compliance with other program requirements, Federal, State and local laws.

(i) Other program requirements. To the extent that assistance from any of the programs covered by this section is used in conjunction with other HUD program assistance which have lead-based paint requirements which may have more or less stringent requirements, the more stringent requirements will prevail.
(ii) HUD responsibility. If HUD determines that a State or local law, ordinance, code or regulation provides for lead-based paint testing or hazard abatement in a manner which provides a level of protection from the hazards of lead-based paint poisoning at least comparable to that provided by the requirements of this section and that adherence to the requirements of this subpart would be duplicative or otherwise cause inefficiencies, HUD may modify or waive the requirements of this section in such manner as may be appropriate to promote efficiency while ensuring such comparable level of protection.

(iii) Grantee responsibility. Nothing in this section is intended to relieve any grantee in the programs covered by this section of any responsibility for compliance with State or local laws, ordinances, codes or regulations governing lead-based paint testing or hazard abatement.

(iv) Disposal of lead-based paint debris. Lead-based paint and defective paint debris shall be disposed of in accordance with applicable Federal, State or local requirements. (See, e.g., 40 CFR Parts 260 through 271.)

§ 570.609 Use of Debarred, Suspended, or Ineligible Contractors or Subrecipients.
Assistance under this part shall not be used directly or indirectly to employ, award contracts to, or otherwise engage the services of, or fund any contractor or subrecipient during any period of debarment, suspension, or placement in ineligibility status under the provisions of 24 CFR Part 5.

§ 570.610 Uniform Administrative Requirements and Cost Principles
The recipient, its agencies or instrumentalities, and subrecipients shall comply with the policies, guidelines, and requirements of 24 CFR part 85 and OMB Circulars A-87, A-110 (implemented at 24 CFR part 84), A-122, A-133 (implemented at 24 CFR part 45), and A-128² (implemented at 24 CFR part 44), as applicable, as they relate to the acceptance and use of Federal funds under this part. The applicable sections of 24 CFR parts 84 and 85 are set forth at §570.502.

§ 570.611 Conflict of Interest
(a) Applicability.

(1) In the procurement of supplies, equipment, construction, and services by recipients and by subrecipients, the conflict of interest provisions in 24 CFR 85.36 and 24 CFR 84.42, respectively, shall apply.

(2) In all cases not governed by 24 CFR 85.36 and 24 CFR 84.42, the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient or by its subrecipients to individuals, businesses, and other private entities under eligible activities that authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to §570.202; or grants, loans, and other assistance to businesses, individuals, and other private entities pursuant to §570.203, 570.204, 570.455, or 570.703(i)).

(b) Conflicts prohibited. The general rule is that no persons described in paragraph (c) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter. For the UDAG program, the above restrictions shall apply to all activities that are a part of the UDAG project, and shall cover any such financial interest or benefit during, or at any time after, such person's tenure.

(c) Persons covered. The conflict of interest provisions of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds under this part.

---

² See footnote 1 for § 570.200(a)(5).
(d) **Exceptions.** Upon the written request of the recipient, HUD may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it has satisfactorily met the threshold requirements of (d)(1) of this section, taking into account the cumulative effects of paragraph (d)(2) of this section.

1. **Threshold requirements.** HUD will consider an exception only after the recipient has provided the following documentation:

   i. A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

   ii. An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

2. **Factors to be considered for exceptions.** In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d)(1) of this section, HUD shall conclude that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

   i. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

   ii. Whether an opportunity was provided for open competitive bidding or negotiation;

   iii. Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

   iv. Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision making process with respect to the specific assisted activity in question;

   v. Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;

   vi. Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

   vii. Any other relevant considerations.

§ 570.612 Executive Order 12372

(a) **General.** Executive Order 12372, Intergovernmental Review of Federal Programs, and the Department's implementing regulations at 24 CFR Part 52, allow each State to establish its own process for review and comment on proposed Federal financial assistance programs.

(b) **Applicability.** Executive Order 12372 applies to the CDBG Entitlement program and the UDAG program. The Executive Order applies to all activities proposed to be assisted under UDAG, but it applies to the Entitlement program only where a grantee proposes to use funds for the planning or construction (reconstruction or installation) of water or sewer facilities. Such facilities include storm sewers as well as all sanitary sewers, but do not include water and sewer lines connecting a structure to the lines in the public right-of-way or easement. It is the responsibility of the grantee to initiate the Executive Order review process if it proposes to use its CDBG or UDAG funds for activities subject to review.

§ 570.613 Eligibility restrictions for certain resident aliens.

(a) **Restriction.** Certain newly legalized aliens, as described in 24 CFR part 49, are not eligible to apply for benefits under covered activities funded by the programs listed in paragraph (e) of this section. "Benefits" under this section means financial assistance, public services, jobs and access to new or rehabilitated housing and other
facilities made available under covered activities funded by programs listed in paragraph (e) of this section. “Benefits” do not include relocation services and payments to which displacees are entitled by law.

(b) Covered activities. “Covered activities” under this section means activities meeting the requirements of §570.208(a) that either:

(1) Have income eligibility requirements limiting the benefits exclusively to low and moderate income persons; or

(2) Are targeted geographically or otherwise to primarily benefit low and moderate income persons (excluding activities serving the public at large, such as sewers, roads, sidewalks, and parks), and that provide benefits to persons on the basis of an application.

(c) Limitation on coverage. The restrictions under this section apply only to applicants for new benefits not being received by covered resident aliens as of the effective date of this section.

(d) Compliance. Compliance can be accomplished by obtaining certification as provided in 24 CFR 49.20.

(e) Programs affected.

(1) The Community Development Block Grant program for small cities, administered under subpart F of part 570 of this title until closeout of the recipient's grant.

(2) The Community Development Block Grant program for entitlement grants, administered under subpart D of part 570 of this title.

(3) The Community Development Block Grant program for States, administered under subpart I of part 570 of this title until closeout of the unit of general local government's grant by the State.

(4) The Urban Development Action Grants program, administered under subpart G of part 570 of this title until closeout of the recipient's grant.

§ 570.614 Architectural Barriers Act and the Americans with Disabilities Act

(a) The Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157) requires certain Federal and Federally funded buildings and other facilities to be designed, constructed, or altered in accordance with standards that insure accessibility to, and use by, physically handicapped people. A building or facility designed, constructed, or altered with funds allocated or reallocated under this part after December 11, 1995, and that meets the definition of "residential structure" as defined in 24 CFR 40.2 or the definition of "building" as defined in 41 CFR 101-19.602(a) is subject to the requirements of the Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157) and shall comply with the Uniform Federal Accessibility Standards (appendix A to 24 CFR part 40 for residential structures, and appendix A to 41 CFR part 101-19.6, for general type buildings).

(b) The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218 and 225) (ADA) provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, State and local government services, and telecommunications. It further provides that discrimination includes a failure to design and construct facilities for first occupancy no later than January 26, 1993 that are readily accessible to and usable by individuals with disabilities. Further, the ADA requires the removal of architectural barriers and communication barriers that are structural in nature in existing facilities, where such removal is readily achievable—that is, easily accomplishable and able to be carried out without much difficulty or expense.
Section Three

3. CITIZEN PARTICIPATION
ATTACHMENTS
Table of Contents

CITIZEN PARTICIPATION DOCUMENTS - ATTACHMENTS

A - 2018 Citizen Participation Schedule
B - Public Notice Display Ad
C - Public Hearing/Training Sign In Sheets
D - Public Notice Display Ad June 2018
NOTICE

THE MONTGOMERY COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT is initiating planning for the 2018 Annual Action Plan as part of its application for funding to the U.S. Department of Housing and Urban Development (HUD). As part of this planning process, the County will conduct three Public Hearings to provide County residents with information on the planning process for the FY 2018 Community Development Block Grant Program (CDBG), the Emergency Solutions Grant Program (ESG), and the HOME Investment Partnerships (HOME) Program. In addition, the meetings will serve as information-gathering sessions on the need for homeless prevention services, homeless shelters, transitional housing, affordable housing development, housing and services for those with special needs, community services for low- and moderate-income communities, economic development and public facility/infrastructure needs in low- and moderate-income neighborhoods.

This is an opportunity for individuals and organizations to provide feedback to the County on the needs of low- and moderate-income residents, to learn about the programs and to be involved in determining how the County will use the approximately $3.5 million in allocations, from HUD, to improve our community. The County encourages participation of all its residents, especially the involvement of very low income residents, industries and non-English speaking persons and persons with mobility, visual or hearing impairments.

Meeting places are handicap accessible. If you have a special need and require an accommodation in order to participate, please contact Emma Hertz at 610-278-3540 (TDD 610-278-7271). Advance notice of 72 hours is required for sign-language or non-English speaking interpreter services.

1. Public Input
   March 6, 2018 8:00 p.m.
   Montgomery County Community College
   Pottstown Campus Room SH221
   101 College Drive, Pottstown 19464

2. Public Input
   March 21, 2018 6:00 p.m.
   Willow Grove Court House Annex
   Third Floor Conference Room
   Willow Grove 19090

3. Public Input
   March 8, 2018 6:00 p.m.
   Montgomery County Human Service Center
   Room A/B
   1400 Dauphin Street, Norristown 19401

NOTE: Montgomery County Community College will not be affiliated with the event and the College should not be contacted regarding the program.

MONTGOMERY CTY DEPT OF HOUSE
AND COMMUNITY DEVELOPMENT
NORRISTOWN, PA 19404
3-054862000
00007497452-01
Kristen Smith being duly affirmed according to law, deposes and says that he/she is the Legal Billing Co-ordinator of the INTELLIGENCER INCORPORATED, Publisher of The Intelligencer, a newspaper of general circulation, published and having its place of business at Doylestown, Bucks County, Pa. and Horsham, Montgomery County, Pa.; that said newspaper was established in 1886; that securely attached hereto is a facsimile of the printed notice which is exact as printed and published in said newspaper on
February 14, 2018

and is a true copy thereof; and that this affidavit is not interested in said subject matter of advertising; and all of the allegations in this statement as to the time, place and character of publication are true.

Kristen Smith
LEGAL BILLING CO-ORDINATOR

Affirmed and subscribed to me before me this 14th day of February 2018 A.D.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Ann Clark, Notary Public
Tullytown Borough, Bucks County
My Commission Expires April 30, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

RECEIVED
FEB 16 2018
Montgomery County
Housing & Community Development
THE MONTGOMERY COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT

is initiating planning for the 2018 Annual Action Plan as part of its application for funding to the U.S. Department of Housing and Urban Development (HUD). As part of this planning process, the County will conduct three Public Hearings to provide County residents with information on the application process for the FY 2018 Community Development Block Grant Program (CDBG), the Emergency Solutions Grant Program (ESG), and the HOME Investment Partnerships (HOME) Program. In addition, the meetings will serve as information gathering sessions on the need for homeless prevention services, homeless shelters, transitional housing, affordable housing development, housing and services for those with special needs, community services for low and moderate income communities, economic development and public facilities/infrastructure needs in low and moderate income neighborhoods.

This is an opportunity for individuals and organizations to provide feedback to the County on the needs of low and moderate income residents, to learn about the programs and to be involved in determining how the County will use the approximately $3.5 million in allocations, from HUD to improve our community. The County encourages participation of all its residents, especially the involvement of very low income residents, minorities and non-English speaking persons and persons with mobility, visual or hearing impairments.

Meeting places are handicap accessible. If you have a special need and require an accommodation in order to participate, please contact Emma Hertz at 610-278-3540 (TDD 610-631-1211). Advance notice of 72 hours is required for sign-language or non-English speaking interpreter services.

1. Public Input
   March 6, 2018       6:00 p.m.
   Montgomery County Community College *
   Pottstown Campus Room: SH221
   101 College Drive, Pottstown 19464

2. Public Input
   March 21, 2018      6:00 p.m.
   Willow Grove Courthouse Annex
   Third Floor Conference Room
   Willow Grove 19090

3. Public Input
   March 8, 2018       6:00 p.m.
   Montgomery County Human Service Center
   Room A/B
   1430 DeKalb Street, Norristown 19401

NOTE: *Montgomery County Community College is not affiliated with the event and the College should not be contacted regarding the program.
Budget

The Budget proposed major changes to Medicare, which could save billions, benefiting writers and others. The Budget also makes large cuts to different programs, including Medicare, veterans' care, and disaster relief. On the plus side, the budget increases support for research and education, including medical research.

The Budget also includes provisions to help struggling cities, including funding for infrastructure projects and a new program to support small businesses. Overall, the Budget aims to balance the federal budget by 2024.

The Montgomery County Department of Community and Economic Development

The report highlights the County's efforts to attract and retain businesses, and to improve the quality of life for residents. It also notes the challenges facing the County, including budget constraints and the need for infrastructure improvements.

Furniture

The furniture store chain in the area is planning to open a new location. The store will feature a wide selection of furniture and home decor items, including sofas, beds, and dining tables. The store will also offer a variety of customization options, allowing customers to create their own unique furniture pieces.

Lottery

The Virginia Lottery has announced changes to its scratch-off game rules. The changes include new prize amounts, and new game themes. The changes are intended to increase the excitement and appeal of the games.

Veterans

The Department of Veterans Affairs is proposing changes to its benefit programs. The changes include increased funding for mental health services and improved benefits for veterans with disabilities. The proposals are intended to improve access to care and support for veterans.

The budget proposed a bill to help struggling cities, including funding for infrastructure projects and a new program to support small businesses. Overall, the budget aims to balance the federal budget by 2024.
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

Location: Room 221, South Hall
Montgomery County Community College
101 College Drive, Pottstown, PA

Date: March 6, 2018
Time: 6:00 PM

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steve Young</td>
<td>Tried Associates</td>
</tr>
<tr>
<td>Craig Way</td>
<td>MOSAIC CLT, Pottstown</td>
</tr>
<tr>
<td>Carina M. Magnon</td>
<td>OHCD</td>
</tr>
<tr>
<td>Terry McMullen</td>
<td>Montco OHCP</td>
</tr>
</tbody>
</table>

Comments:
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

Location: Conference Room A/B
Montgomery County Human Services Ctr.
Norristown, PA

Date: March 8, 2018

Time: 6:00 PM

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grand C.</td>
<td></td>
</tr>
<tr>
<td>Estevez</td>
<td></td>
</tr>
<tr>
<td>Emma Herz</td>
<td></td>
</tr>
</tbody>
</table>

Comments:
Montgomery County Department of Housing & Community Development
Citizen Participation Area Meeting
Attendance/Sign-in Sheet

Location: County Annex, 3rd Fl
Willow Grove, PA

Date: March 21, 2018

Time: 6:00 PM

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comments:

- County offices closed due to snow
  (event cancelled)
PUBLIC NOTICE
Availability of the Draft 2018 Annual Action Plan &
Notice of Amendment to Prior Years Annual Action Plans
For the County of Montgomery, PA

In accordance with the Federal regulations at 24 CFR Part 91, the County of Montgomery has prepared a Draft 2018 Annual Action Plan for Community Planning and Development Programs. This document is a requirement for direct assistance under certain U.S. Department of Housing and Urban Development (HUD) funding programs including the Community Development Block Grant Program (CDBG), the Home Investment Partnerships Program (HOME), and the Emergency Solutions Grant Program (ESG). Additionally, the County has included in the plan funding for projects to be funded through the local Affordable Housing Trust Fund (AHTF).

HUD regulations and Montgomery County’s Citizen Participation Plan require the publication of a notice which:

a) States the availability of the Draft 2018 Annual Action Plan and locations where copies are available for examination;
b) Summarizes the Draft 2018 Annual Action Plan; and
c) Allows citizens an opportunity to comment on the Citizen Participation Plan

Availability
The Draft 2018 Annual Action Plan is available during the period of June 22, 2018 through July 22, 2018 for citizens, public agencies and other interested parties to examine its contents and to submit comments. Citizens may submit their comments through the mail, telephone or in person, Monday through Friday, 8:30 a.m. to 4:15 p.m. Comments will be received until July 22, 2018. Comments submitted by mail should be addressed to: Chair, Montgomery County Board of Commissioners, PO Box 311, Norristown, PA 19404-0311 or Emma Hertz, Administrator, Office of Housing and Community Development, PO Box 311, Norristown, PA 19404-0311.

Copies of the Plan are available for public inspection during regular County business hours at the following locations:

Montgomery County Commissioner’s Office
8th Floor, One Montgomery Plaza
425 Swede Street
Norristown, PA 19401

Housing & Community Development
3rd Floor, Human Services Center
1430 DeKalb Street
Norristown, PA 19401

Copies of the Plan will also be available for public examination online at www.montcopa.org. Persons with disabilities or limited English-speaking ability requiring access to the plan in an alternative format should contact the Office of Housing and Community Development at 610-278-3540 or (TDD: 610-631-1211), at no cost to the requester.

Summary

The purpose of the Draft Plan is to establish reasonable bases for housing and non-housing assistance. In this regard, it details the uses of expected funds in 2018. At this date, Montgomery County expects to receive
and allocate funds (including Program Income and Recaptured funds) as follows:

a) $4,032,600 in CDBG funds for housing rehabilitation and non-housing needs (public facility, infrastructure, public service and homeless shelter projects);
b) $1,329,959 in HOME funds for affordable housing needs;
c) $1,332,541 from the Montgomery County Affordable Housing Fund for housing needs; and
d) $265,971 in ESG funds for homeless needs and emergency shelter programs.

In accordance with federal regulation at 24 CFR Part 91 whenever the County proposes to amend an Annual Action Plan or the Five Year Consolidated Plan, the County is required to afford citizens an opportunity to comment on the proposed changes. As required in § 91.505 (b), Montgomery County has adopted a Citizen Participation Plan which sets forth the criteria the County will use for determining what constitutes an amendment to the Consolidated Plan and Annual Action Plans. Montgomery County has determined that the proposed activities described below meet the criteria for an amendment to the Annual Action Plans:

**Community Development Block Grant**

**2015 Program Year**
- Project Number: B-15-03-104
  - $80,372.00
  - Cancellation
- East Greenville Borough
- Community Center and Borough Hall ABR Improvements

**2017 Program Year**
- Project Number: B-17-03-202
  - $100,000.00
  - Cancellation
- Pottstown Cluster of Religious Communities
- Rehabilitation of Pottstown Housing Resource Center

- Project Number: B-17-03-113
  - $131,364.00
  - Cancellation
- West Pottsgrove Township
- School Lane Street Improvements

The Draft 2018 Annual Action Plan includes the amount of funds which will benefit persons of very low, low, and moderate income, as well as plans to minimize displacement of persons. No displacement is proposed or expected.

**Public Hearing**

On July 11, 2018, a public hearing will be held on the 2018 Annual Action Plan at 6:00 p.m. at the Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA. Interested parties may attend the hearing and present their comments on the Draft Plan. The Montgomery County Human Services Center is accessible to persons with disabilities. If you have a special need and require an accommodation in order to participate, please contact Emma Hertz, at 610-278-3540 or (TDD: 610-631-1211). Advance notice of 5 days is required for sign-language or non-English speaking interpreter services, at no cost to the requester.

Citizens who may have an interest in projects which may impact historic resources should make themselves known so that the County can involve them in the notification and review process of the National Advisory Council on Historic Preservation (as set forth in 36 CFR Part 800). Please contact the Department no later than July 11, 2018 to be included in the Part 800 notification process.

The Board of Commissioners has a meeting tentatively scheduled for August 9, 2018, to take final action.
on the Plan. County residents wishing to attend this Commissioners’ meeting can visit the County’s website at [www.montcopa.org](http://www.montcopa.org) for exact date and time of the meeting. After considering citizen comments, the Plan will be adopted with such modifications as deemed appropriate. Montgomery County intends to submit the 2018 Annual Action Plan to HUD, on or before August 15, 2018. HUD approval is expected on or before October 1, 2018.
Section Four

4. GRANTEE SF 424 AND CERTIFICATIONS
ATTACHMENTS