

### HOME ARP ALLOCATION PLAN

Lake County Office of Housing and Community Services 2008 Classique Lane, P.O. Box 7800 Tavares, FL 32778

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### Consultation

#### Describe the consultation process including methods used and dates of consultation:

See Appendix A for all Stakeholder Consultation materials, including outreach materials, meeting invitees, meeting attendees and a participant comments. Stakeholder comments received throughout these various sessions and individual meetings are summarized below, in the Appendix, and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

Lake County engaged in a stakeholder consultation process during January and February 2023. During this time, the County conducted several focus groups with a variety of shelter and service providers serving each of the qualifying populations; the Continuum of Care; victim service providers; the public housing agencies representing the County; and organizations addressing fair housing and Civil Rights in the County.

Each of the consultation sessions focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

The County also utilized data, consultations, and recommendations from the Florida Housing Coalition Roadmap to Address Homelessness to inform this Allocation Plan.

#### List the organizations consulted:

Agency Consulted	Date of Session	Method of Consultation	Type of Agency(ies)/Org
Life Stream Behavioral Center	January 18, 2023 February 16, 2023	One-on-One interview Focus Group Session	CoC Homeless service providers serving homeless, at-risk of homeless, other at-risk Agencies addressing the needs of people with disabilities
New Beginnings	February 16, 2023	Focus Group Session	Homeless service providers serving all four QPs Agencies addressing the needs of people with disabilities Veterans Groups
Haven of Lake & Sumter	February 16, 2023	Focus Group Session	Homeless service providers serving the homeless, at-risk

			of homelessness, other at- risk
Eustis Housing Authority	February 10, 2023	Survey	РНА
Community Legal Services of Mid-Florida	February 16, 2023	One-on One interview	Public or Private Agencies that address Fair Housing, Civil Rights
Find Feed Restore	February 16, 2023	Focus Group Session	Homeless service providers serving homeless, at-risk of homeless, other at-risk Agencies addressing the needs of people with disabilities
Lake County Office of Housing and Community Services	January 18, February 10, February 16, 2023	Focus Group Session	Public agency serving all four QPs CoC PHA

#### Summarize feedback received and results of upfront consultation with these entities:

#### **Shelter Providers**

- There is insufficient housing for populations with mental health/substance misuse and other disabling conditions. Inventory is low, but supportive housing and housing with supervision is needed for these populations.
- Permanent Supportive Housing is a need.
- Landlord created barriers to housing include requiring 2 or 3x rent for security deposit; requiring 2-3x rent as minimum monthly income.
- Barriers also include poor rental history, criminal history. When case managers are involved, mental health, substance misuse are less of a barrier to housing.
- Many facilities (shelters) not equipped to assist someone with SMI residential/inpatient not available; outpatient is only available, and consumers don't commit to level of care that they need.

#### Service Providers

- Accessibility to services is a challenge. While many consumers are difficult to engage, location of services and transportation options to get to services make access to the services difficult. Location is everything and coupling together resources/uses in a way that is smart, safe and conducive to recovery is ideal.
- Locating housing near grocery, transportation, health care facilities is a priority. Rural housing is most affordable but is less accessible to these resources.
- Overcrowding is a challenge due to affordability.
- Units most needed are 1-2 bedroom; some demand for larger units.

- In home services to help achieve stability include general housekeeping, financial literacy, employment services. There is a gap in availability/capacity to provide these at the level needed.
- Subpopulations identified include those with mental health/substance misuse; elderly; those with disabling conditions; domestic violence survivors/fleers; chronically homeless.
- Labor-trafficking is more prevalent than sex-trafficking.
- The Housing First model isn't the appropriate intervention for some populations, especially when services are only available as long as housing assistance is available (Rapid Rehousing (RRH)).
- Most stable populations have mental health, financial literacy, and housekeeping counseling.
- Person-centered approach to integrated care management is needed.
- There are many households who have working heads of household, but wages are such that they can't afford housing, so they are staying in hotel.
- Street Outreach to place people into permanent housing is an unmet need.
- Services needed include Mental Health/Behavioral health; primary healthcare; services on site of housing is most effective.

### Domestic Violence Providers

- Transitional Housing is an effective housing model for those fleeing domestic violence. Often, those fleeing domestic violence need employment and other support services; individuals come from unsafe homes and are uncertain about going to ap.t complexes/less secure homes.
- Many landlords are increasing rents by too much; if they have an opportunity to collect 2-3x security deposit from federal programs, they do, but are evicting/increasing rents/not renewing leases because they can.
- Many individuals fleeing domestic violence are also victimized by providers.
- Services are a need. If there are other resources are available for construction costs, than HOME ARP can be used to provide additional services.
- Security is needed for vulnerable populations, but due to lack of inventory, often affordability is considered first, then safety.

### Fair Housing/Civil Rights

- Most clients (not just in Lake County), in Central Flare experiencing eviction because of rental prices increasing and clients can't afford rents. There is an emerging pattern of households renting just one room in a house, still experiencing eviction. Many are working but can't afford the increasing rental costs.
- Emergency rental assistance is a necessity.
- When an eviction is filed, although a client may have a good defense, the client chooses not to challenge the eviction because they have to deposit the amount due to court registry (won't be able to challenge the eviction because they can't make deposit).
- If a tenant decides not to pursue eviction (other agencies refer to shelter or other financial assistance), legal aid does not track tenant. There are some that do shift units and receive some assistance. But shelter assistance is limited, so even if a referral is made, there is no shelter available.

- Domestic Violence victims may have more options in terms of finding shelter than others needing shelter.
- Elderly renters and subsidized housing recipients are highly impacted because they're on fixed income and can't afford the increase in prices.

#### Public Housing Agency/Authorities

- Public Housing waiting list are very long and take several year(s) before being able to issue vouchers or serve new clients.
- Eustis HA is proposing a homeless preference; no other preferences are identified. Lake County Housing Agency has preferences to include domestic violence victims and the disabled.
- The Eustis Housing Authority and Lake County Housing Agency will be submitting a FSS application to HUD in 2023. Activities and services are in the planning stages and have not been finalized.
- Eustis does not administer HCV-they are administered solely by Lake County OHCS.

### **Public Participation**

### Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- Date(s) of public notice: 2/23/2023
- Public comment period: start date 3/3/2023 end date 3/17/2023
- Date(s) of public hearing: 3/9/2023

### Describe the public participation process:

Lake County published a notice informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on February 23, 2023. A copy of the notice and Plan were also made available on the County's Website. The Plan was available for a 15-day period, and the County conducted a public hearing on March 9, 2023. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

### Describe efforts to broaden public participation:

Lake County offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing either in person or virtually were made available.

### Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

There were no comments received at the hearing or during the public comment period.

### Summarize any comments or recommendations not accepted and state the reasons why:

There were no comments received at the hearing or during the public comment period.

### **Needs Assessment and Gaps Analysis**

Like many communities, Lake County, FL is facing increases in homelessness and lacks a sufficient inventory of affordable housing to meet the need. Permanent supportive housing programs are at capacity, and emergency shelters are full, with increasing lengths of stay. In 2021 the length of stay in emergency shelter was almost three months, which could indicate a need for additional shelter beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelters, transitional housing, and other housing facilities.

The County also has a need for affordable housing. The shortage of units both affordable and available for renter households at or below 30% area median income (AMI) increases housing insecurity and rent pressure on extremely low-income households. As rent prices continue to increase, while incomes remain stagnant (or in many cases have decreased), demand for affordable units far exceeds supply. The table below describes the housing inventory in Lake County utilizing CHAS data, the most current dataset being 2015-2019. Though this data is now dated and does not include impacts of the pandemic, it can reasonably be assumed that the challenges have only been exacerbated by the pandemic.

	Current Inventory	Level of Need	Gap Analysis
LAKE COUNTY, FL	# of Units	# of Households	# of Households
Total Rental Units	37,175		
Rental Units Affordable to HH at 30%	4,590		
AMI (At-Risk of Homelessness)			
Rental Units Affordable to HH at 50%	7,220		
AMI (Other Populations)			
0%-30% AMI Renter HH w/ 1 or more		5,160	
severe housing problems			
(At-Risk of Homelessness)			
30%-50% AMI Renter HH w/ 1 or more		6,185	
severe housing problems			
(Other Populations)			
Current Gaps			9,485

#### **Housing Needs Inventory and Gap Analysis Table**

HOMELESS

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

### Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

The Continuum of Care (CoC) includes Citrus, Hernando, Lake, and Sumter Counties. Data reported throughout this report is specific to Lake County, except as noted.

#### Homeless as defined in 24 CFR 91.5

The number of Lake County residents that meet the definition of homeless under 24 CFR 91.5 was derived from *The Lake County Roadmap to Address Homelessness*. Lake County has a significant

unsheltered adult population. Unsheltered homelessness means that people are sleeping in places not meant for human habitation (e.g., in encampments or cars). Out of a total of 139 single adult households, 100 households are unsheltered. In contrast, 92% of families with children are in emergency shelter or transitional housing. Eighty-four percent of households experiencing homelessness are adults without children. Families with children comprise only 16% of the total households experiencing homelessness. The 2022 Point in Time identified 141 sheltered homeless individuals in Lake County.

Per HMIS data for calendar year 2021, there were 635 individuals accessing programs and systems. From January 1, 2022, through October 31, 2022, there were 625 individuals served.

Program	Person	Persons Served		
	Jan. 1-Dec. 31, 2021			
		Jan. 1-Oct. 31, 2022		
Emergency Shelter	177	223		
Rapid Re-Housing	223	244		
Street Outreach	128	102		
Transitional Housing	107	56		
Total	635	625		

Although the HMIS data for 2022 is not for the full year, there is a 20.3% decrease in individuals accessing street outreach programs and a 47.7% decrease in those in transitional housing. However, there is a 26% increase in individuals utilizing emergency shelters indicating a rise in individuals experiencing homelessness.

Per HMIS, in 2021, 445 individuals served (70.1%) were adults and 189 were children (30%). In the 10 months so far reported in 2022, 415 individuals served (66.4%) were adults and 204 (32.6%) were children. Furthermore in 2021, 47.9% of the adults were male and 52.1% were female. For the 10 months in 2022, 47.9% of the adults were male and 51.6% were female.

The table below shows the racial and ethnic breakdown of the majority of individuals who were served in 2021 and the 10 months of 2022.

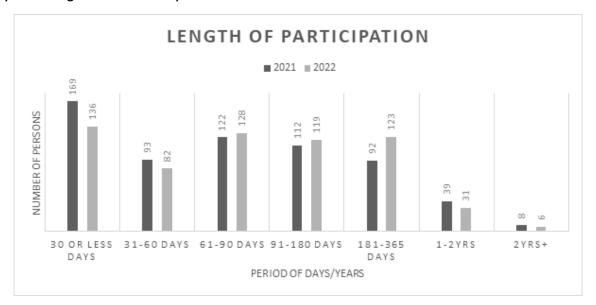
Race and Ethnicity	Jan. 1-Dec. 31, 2021		Jan. 1-Oct	. 31, 2022
	Persons	Percentage	Persons	Percentage
White	356	56.1%	328	52.5%
Black/African American	249	39.2%	258	41.3%
Hispanic or Latino	61	9.6%	60	9.6%

Per the American Community Survey 2017-2021 5-year estimates the population of Lake County was 395,804 and 68.5% were White, 10.4% were Black/African American, and 17.9% were Hispanic/Latino. This indicates that Black/African American individuals are disproportionately disadvantaged.

HMIS data indicates that, of the 635 individuals that accessed the various programs and systems in 2021, only 434 (68.3%) exited the homeless system and of those, only 206 (47.5%) exited to positive

destinations. For the 10 months in 2022, of the 625 individuals that accessed the various programs and systems only 422 (67.5%) exited the homeless system and of those, 234 (55.5%) exited to positive destinations. This suggests a need for more housing options.

The chart below shows the length of participation per HMIS in 2021 and the 10 months of 2022. The length of participation is highest for 30 days and below, but the trend seems to be showing lengths of stay increasing in the 61-365 days brackets.



According to the Florida Homeless Coalition's Roadmap to Address Homelessness, there's been a decrease in homelessness in Lake County between 2020 and 2021. However, resources to conduct the Point in Time Count were limited throughout the country this year due to COVID, and temporary financial resources available to prevent episodes of homeless likely impacted the count. The CoC Lead Agency (Mid Florida Homeless Coalition) reports there has been an increase in requests for assistance, citing 70 newly identified individuals entering the homeless assistance system in April 2021 alone. The Mid Florida Homeless Coalition maintains a By Name List that identifies households newly entering the system and households that are currently experiencing homelessness. As of June 30, 2021, the By Name List included 411 individuals representing 284 households. The By Name List typically represents a reasonably accurate count of households experiencing homelessness and is a better estimation than the PIT Count.

#### At Risk of Homelessness as defined in 24 CFR 91.5

Based on HMIS data for the calendar year 2021, the CoC served 635 individuals across four programs. Of those served, 434 exited the program; 139 leavers exited without ongoing income and 80 exited without an ongoing subsidy, potentially putting them at risk of returning to homelessness.

Based on HMIS data for January 1, 2022-October 31, 2022, the CoC served 625 individuals across four programs. Of those served, 422 exited the program; 99 leavers exited without ongoing income and 41 exited without an ongoing subsidy, potentially putting them at risk of returning to homelessness.

According to 2015-2019 CHAS data, in Lake County there are **37,175 rental units of which only 4,590 are affordable to households with income at or below 30%** of the area median income (AMI). Households earning between 0-30% area median income total 6,320. Factoring in that only 38.5% of the affordable units are housing those with the appropriate income, the gap (the number of housing units needed) for those earning 30% AMI or less is 4,555 units.

Per the same CHAS data, 18,385 (53.6%) renter households have at least one of the four housing problems: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. Furthermore, 8,985 (26.2%) of renter households have one at least one of the four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

Based on HMIS data for the calendar year January 1, 2021-December 31, 2021, 35.7% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate greater risk of returning to the homeless system.

Lake County received two rounds of Emergency Rental Assistance. For ERA-1, \$11,085,380.50 was received and expended on assisting 1,455 households with past due rent. Of those, 48.9% earned 30% AMI or below. Another 28.2% of households assisted fell in the 50% AMI range. Finally, the remaining 22.9% of households assisted earned in the 80% AMI range. For ERA-2, \$4,363,743.91 was received and 552 households were assisted. Of those, 49.3% earned 30% AMI or below. Another 29.6% of households assisted fell in the 50% AMI range, and the remaining 21.1% of households assisted earned in the 80% AMI range.

In addition, Lake County provided 363 households with utility assistance authorized under the Emergency Rental Assistance Program. Of these households, 45.6% had income at or below 30% AMI. Another 34.6% of households assisted fell in the 50% AMI range. Finally, the remaining 19.8% of households assisted earned in the 80% AMI range. Households requiring assistance with rent and/or utility payments may be at greater risk of experiencing homelessness if they cannot sustain ongoing payments.

According to the Lake County Housing Agency, there are 26 applicants on the Housing Choice Voucher waitlist. About 80% of those on the list have been waiting **for over a decade**, pointing to a need for affordable inventory in the County. The Eustis Housing Authority indicated 38 households were on the waiting list for public housing in the City of Eustis.

The consultation process revealed that overcrowding is a challenge due to lack of affordable housing inventory in the County, and households are doubling up in small units, mobile homes, or even renting a room in a single-family home.

### Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Per the 2021 HMIS, 60 (9.5%) individuals had a history of domestic violence and 8 (1.3%) were actively fleeing domestic violence. In the 10 months reported for 2022 those numbers slightly increased to 61 (9.8%) individuals who had a history of domestic violence and 12 (1.9%) were actively fleeing domestic violence.

Of those with a history of domestic violence in 2021 71.7% were households of only adults and 28.3% were households with adults and children. There were zero children only households with a history of domestic violence. Of those with a history of domestic violence in the 10 months reported in 2022 63.9% were households of only adults and 36.1% were households with adults and children. There were zero children only households with a history of domestic violence. Additionally, of the 8 who were fleeing domestic violence in 2021, 62.5% were adult only households and 37.5% were households with adults and children. In the 10 months reported for 2022, of the 12 who were fleeing domestic violence, 41.7% were adult only households and 58.3% were households with adults and children. In both time frames, there were zero children only households actively fleeing domestic violence.

Data was not readily available on victims of human trafficking, though stakeholders reported that labor trafficking is more prevalent than sex trafficking in Lake County.

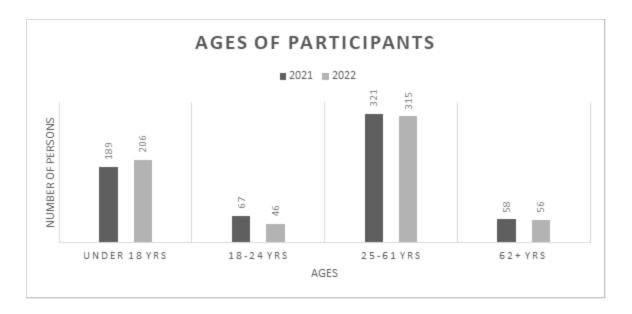
### Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Those at greatest risk of housing instability include 4,265 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents 12.4% of all renter households in the County. In addition, 2,355 renter households earn 30%-50% AMI and pay more than 50% of their income on housing.

During the 2021 calendar year, 108 households exited to temporary destinations, which is 24.9% of all households who exited. In the 10 months reported in 2022, 88 (20.9% of exits) households exited to temporary destinations. Households receiving temporary assistance are more likely to return to homelessness or face greater risk of housing instability than those exiting to permanent destinations. Furthermore, in 2021 54 households, or 12.4% of all exits, exited to places not meant for human habitation which signals immediate returns to homelessness, indicating a need for ongoing services/assistance to prevent these returns. For the period January 1-October 31, 2022, 43 households, or 10.2% of all exits, exited to places not meant for human habitation.

Of the 434 adults/heads of households that exited the homeless system in 2021, 139, or 32%, of those who exited did so with zero income. For the 10 months in 2022, of the 422 adults/heads of households that exited, 88 did so to temporary programs and 99, or 23.5%, of those who exited did so with zero income. Households without a source of income to pay ongoing rent payments may be at greater risk of returning to homelessness.

As shown in the chart below, per the HMIS in 2021, 67 youth households accessed the system and services. This makes up 10.6% of all households. In the 10 months reported for 2022, there were 46 (7.4%) youth households who accessed the system.



Veterans who accessed the system and services in 2021 made up 9% with 57 households assessed. In the 10 months of 2022, Veterans who accessed the system and services made up 9.4% with 59 households.

### Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

The Lake County Office of Housing and Community Services provides rental assistance through Emergency Rental Assistance, Housing Choice Voucher Program, Permanent Supportive Housing Grant, Veterans Affairs Supportive Housing (VASH) Vouchers, and the State Housing Initiatives Partnership Program. In addition, Lake County utilized CDBG-CV funds for mortgage assistance; however, those resources are finite and are not expected to be available after 2023.

Lake County's allocation of funding in response to homelessness has increased significantly in the last two years. A large part of the COVID response in Lake County has been non-congregate shelter, homelessness prevention, street outreach, and Rapid Rehousing with Case Management services. Lake County mobilized a response to help those at risk of homelessness with rental assistance. The Office of Housing and Community Services oversees the U.S. Department of Treasury's Emergency Rental Assistance (ERA) Program and has provided rent, deposit and utility assistance to over 2,000 households in Lake County since the inception of the program in early 2021. Lake County also allocated CDBG-CV resources for mortgage and utility assistance, though these funds will be expiring and are unlikely to continue. In addition to the remaining ERA program funds, approximately \$3 million in ARPA funding has been allocated for the development of affordable housing. The Mid Florida Housing Coalition (MFHC), which covers the CoC's geographic footprint, also implemented a response to the current housing crisis response system by increasing street outreach, homelessness prevention, non-congregate shelter, and Rapid Rehousing. MFHC received almost 13 times the amount of Emergency Shelter Grant (ESG) funding they receive in one fiscal year for the COVID response. Even with this level of funding, there are still people experiencing homelessness throughout Lake County who are unable to access permanent housing resources.

Due to expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in Lake County experienced significant strains. Despite additional funding during the pandemic, there is still insufficient capacity across all systems to address all unmet needs of all qualifying populations. This includes staff capacity, inventory capacity and resource capacity to appropriately address growing needs among all of the qualified providers. Service providers and shelters alike experience ongoing staffing shortages that contribute to these capacity challenges, but also the housing market and inventory is rapidly changing.

#### Describe the unmet housing and service needs of qualifying populations:

#### Homeless as defined in 24 CFR 91.5

In a report prepared by the Florida Housing Coalition, shelter and street outreach services were identified as unmet needs in Lake County. While the County utilizes CARES Act resources for outreach, there is still a need for additional resources to assist in connecting unsheltered populations with immediate housing and other services. Stakeholders interviewed during the development of the Lake County Roadmap report indicated insufficient shelter resources for people experiencing homelessness, and this was reiterated during HOME-ARP consultations. Shelter providers also indicated that many facilities (shelters) are not equipped to assist someone with SMI and consumers don't commit to level of care that they need in an inpatient facility. Overall, there is insufficient housing for populations with mental health/substance misuse and other disabling conditions. Affordable inventory is low in general, but supportive housing and housing with supervision is needed for these populations.

In home services to help achieve stability include general housekeeping, financial literacy, employment services. There is a gap in availability/capacity to provide these at the level needed, according to stakeholders consulted for this process.

According to the Lake County Housing Agency, there are 26 applicants for Housing Choice Vouchers on a waitlist. About 80% of those on the list have been waiting for over a decade, pointing to a need for affordable inventory in the County.

Per the HMIS in 2021, 446 persons of the 635 that accessed the system were chronically homeless. For the 10 months reported in 2022, 418 persons were chronically homeless. As approximately 70% of households experiencing homelessness have a chronic issue, it suggests a great need for more housing options. As mentioned throughout this analysis, HMIS indicated 635 individuals in 2021 and 625 individuals in the first 10 months of 2022 were served by the homeless systems and services.

Reducing homelessness in Lake County will be achieved only by increasing permanent housing solutions so people can move out of homelessness and into housing. The most effective and efficient response to homelessness is a focus on permanent housing by increasing the stock of housing that is affordable to the lowest income households and, investing in Rapid Rehousing and Permanent Supportive Housing. While there has been some discussion in Lake County regarding the need for an emergency shelter facility, this reduces the availability of funding for more permanent housing resources, and lengths of stay in shelter will increase if households can't make their way out of shelter into affordable permanent housing.

The consultation process identified barriers to affordable housing, including poor rental history and criminal history. When case managers are involved, mental health, substance misuse are less of a barrier to housing. Landlord created barriers to housing include requiring 2 or 3x rent for security deposit; requiring 2-3x rent as minimum monthly income. Low-barrier housing and shelter options make help as easily accessible as possible.

#### At Risk of Homelessness as defined in 24 CFR 91.5

The Lake County Roadmap prepared by the Florida Housing Coalition indicated that homelessness prevention assistance was readily available within the county. The United Way currently administers prevention funding from a variety of sources. Prevention assistance is currently funded in the county through private grants, TANF, ESG, ERA, and SHIP. Though prevention resources are available, the Roadmap indicated that diversion is not currently widely implemented in Lake County, but could be an effective strategy in Lake County, particularly given the insufficient affordable housing inventory. Providing stabilization services, landlord mediation, and/or financial assistance are needed in order to effectively implement a prevention strategy in the County.

Consultations reported that accessibility to services is a challenge. While many consumers are difficult to engage, location of services and transportation options to get to services make access to the services difficult. Location is everything and coupling together resources/uses in a way that is smart, safe and conducive to recovery is ideal. Services for households being placed in housing are a need, but they are critical to housing stability and preventing returns to homelessness. Stakeholders also reported during consultation that Housing First isn't always an appropriate intervention for some populations, especially when services are only available as long as housing assistance is available.

Many landlords are increasing rents significantly, putting households at risk of eviction and homelessness if they are unable to afford the increased rent. Many landlords, too, have an opportunity to collect 2-3x security deposit from federally assisted programs, but are still evicting/increasing rents/not renewing leases, as reported during the consultation process. This could point to a need for additional rental assistance resources and additional affordable inventory.

According to 2015-2019 CHAS data, there is a gap of 9,485 affordable units for Lake County. This indicates that the supply of affordable housing units is insufficient for households earning 0-30% AMI and those earning 30-50% AMI. As a result, these households reside in housing units that are more costly than what would be considered affordable to them. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 4,590 rental households in the County considered at risk of homelessness, these additional costs further exacerbate the limited access to affordable housing. The consultation process also confirmed that the supply of affordable options for housing low-income households is insufficient to meet growing needs among the qualifying populations.

The table below shows a detailed breakdown of the CHAS data for rental households:

	Tota	al	Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	34,305	-	17,425	50.8%	7,490	21.8%
Very Low-Income Renters (0-50% AMI)	13,470	39.3%	11,065	32.3%	6,620	19.3%
30-50% AMI	7,150	20.8%	6,015	17.5%	2,355	6.9%
Extremely Low-Income Renters (0-30% AMI)	6,320	18.4%	5,050	14.7%	4,265	12.4%

### Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Per the 2021 HMIS, 60 (9.5%) individuals had a history of domestic violence and 8 (1.3%) were actively fleeing domestic violence. In the 10 months reported for 2022 those numbers slightly increased to 61 (9.8%) individuals who had a history of domestic violence and 12 (1.9%) were actively fleeing domestic violence.

Of those with a history of domestic violence in 2021 71.7% were households of only adults and 28.3% were households with adults and children. There were zero children only households with a history of domestic violence. Of those with a history of domestic violence in the 10 months reported in 2022 63.9% were households of only adults and 36.1% were households with adults and children. There were zero children-only households with a history of domestic violence. Additionally, of the 8 who were fleeing domestic violence in 2021, 62.5% were adult only households and 37.5% were households with adults and children. In the 10 months reported for 2022, of the 12 who were fleeing domestic violence, 41.7% were adult only households and 58.3% were households with adults and children. In both time frames, there were zero children only households actively fleeing domestic violence.

Transitional housing has been identified as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult. Often, fleers need employment and other supports. Individuals coming from unsafe homes are uncertain about going to apartment complexes, less secure homes.

### Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

According to HMIS, during the 2021 calendar year, 434 individuals exited the homeless system. Of these, 24.9% exited to temporary destinations, including transitional housing and temporarily staying with friends or family. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 18.4% exited to rentals without ongoing subsidy. In the 10 months reported in 2022, 422 individuals exited the system with 20.9% to temporary destinations and 9.7% to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely

low-, and low-income households. The Roadmap prepared by the Florida Housing Coalition identified the current capacity of housing case management as a challenge in providing sufficient services for households once placed in housing in order to encourage stability, especially once rental assistance and other financial resources terminate. Stakeholders reinforced this during the consultation process, noting that individuals receiving ongoing case management, on-site services, and financially literacy services are more successful once placed in housing and avoid returns to homelessness when these services are available.

**Veterans:** Per HMIS data for 2021, 57 Veterans were homeless. Only 30 exited from homelessness and of those, 4 (13.3%) to temporary destinations. In the 10 months reported for 2022, 59 Veterans were homeless. Only 28 exited from homelessness and of those, 5 (17.9%) to temporary destinations Continuity of assistance is important, so Veteran households do not regress and have to start over identifying services and housing options. Providing permanent affordable options for Veterans could help address this need. During the 2020 PIT, 12 Veterans were determined to be unsheltered indicating a barrier in accessing these resources or difficulties by service providers in engaging veterans. These barriers may include co-occurring mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

**Persons with Disabilities**: According to 2021 HMIS, 144 individuals with physical disabilities were homeless. In the 10 months reported for 2022, 145 individuals with physical disabilities were homeless. For people with disabilities, housing that is both affordable and accessible is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

### Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

According to Lake County 2-1-1 calls for the 2021 calendar year, the service received over 10,173 contacts. The top request with 3,571 (35.1%) calls was for housing and shelter. Of the 3,571 calls for housing and shelter, 88% were for three requests: 34.4% for shelters, 32.8% for rental assistance, and 20.8% for low-cost housing. Utilities was the second highest request with 18.2% and healthcare and COVID-19 calls received 16.1%. The top three requests accounted for 69.4% of all calls. The fourth highest request was for employment and income with 8%.

There were 12,162 calls to Lake County 2-1-1 for the 2022 calendar year, an increase of 20%. The top request with 4,469 (36.7%) calls was for housing and shelter. Of the 4,469 calls for housing and shelter, 90.8% were for three requests: 43% for shelters, 29.6% for rental assistance, and 18.2% for low-cost housing. Utilities was the second highest request with 24.3% and healthcare and COVID-19 calls received 10.1%. The top three requests accounted for 71.1% of all calls. The fourth highest request was for food with 6.5%.

Since PIT and HIC data only provide a snapshot of persons experiencing homelessness on a single night, a broader picture can be provided through data currently presented in Lake County's Annual Performance Report (APR) for January 1, 2021-December 31, 2021, 635 households stayed at least one night in emergency shelter (ES), rapid re-housing (RRH), or transitional housing (TH) or street outreach (SO). Data was also provided for the first 10 months of 2022. Below are charts showing the number of total exits and positive exits for the 2021 and 2022 data.

	Exits from the Homeless	ness System 2021	
	% Exits to Positive Destinations	# of Households Exited to Positive Destinations	Total # of Households Exited
By Household type		1	1
Adult-only Households	35.3%	78	221
Households with Children	60.1%	128	213
Child-only Households	n/a	0	0
By Pathway	·		
ES	49.3%	67	136
RRH	68.6%	81	118
SO	18.6%	21	113
тн	55.2%	37	67
All Households	47.5%	206	434
	Exits from the Homeless	ness System 2022	
	% Exits to Positive	# of Households Exited	Total # of
	Destinations	to Positive Destinations	Households Exited
By Household type			
Adult-only Households	35.4%	64	181
Households with Children	70.5%	170	241
Child-only Households	n/a	0	0
By Pathway			
ES	49.5%	94	190
RRH	80%	123	154
SO	8.1%	5	62
тн	75%	12	16
All Households	55.5%	234	422

In both periods of time, approximately 50% of households exiting emergency shelters exited to positive housing destinations, suggesting an inadequate supply of permanent housing resources for all household types that entered the shelter system. While households utilizing Rapid Rehousing programs experienced more successful placements in permanent housing, it is unclear if the household receives ongoing support in the way of rental assistance and/or services. This could be a population at risk of returning to the homeless system if insufficient resources are available to these households.

During the preparation of the Roadmap to Address Homelessness, surveys were distributed electronically to homeless service providers in Lake County. Fourteen providers submitted responses. Respondents ranked affordable housing, permanent supportive housing and rapid rehousing as the most critical needs in the County, indicating a significant gap for housing inventory in the County. Also identified as needs were homeless prevention, mental health/substance misuse services and primary healthcare, which were reiterated by stakeholders during the consultation process. Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Lake County is not identifying additional characteristics at this time.

#### Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, rental housing that is affordable and accessible to individuals and households is the priority need. Stakeholders reported an increase in rent prices, forcing households into homelessness or otherwise unstable housing situations. An adequate inventory of deeply subsidized housing for Qualifying Populations is a priority due to landlord barriers and these escalating rental costs. Coupled with this is a priority for rental assistance and supportive services to assist the homeless identify and access housing and become stably housed, as well as to prevent homelessness among households who are at greatest risk. Additionally, individuals need to be connected to services quickly, particularly mental health and substance abuse services, especially for those exiting the criminal justice system.

### Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

In addition to feedback from stakeholders and consultation sessions, the following plans and data sources were consulted to determined needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS) 5-year estimates, 2017-2021
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2015-2019
- Lake County Coalition on Homelessness 2022 Point-In-Time Counts (PIT)
- Lake County Coalition on Homelessness Housing Inventory Count (HIC)
- Lake County Coalition on Homelessness Coordinated Entry System (CES)
- Lake County CoC Annual Performance Report (APR)
- United Way of Lake County's 2-1-1 Counts
- Lake County Roadmap To Address Homelessness, prepared by Florida Housing Coalition

To evaluate the size and demographic composition of qualifying populations within its boundaries, the County enlisted the help of the Mid-Florida Housing Coalition (CoC Lead) to provide data on homelessness and other qualifying populations. The County utilized CHAS, ACS and HIC data to identify the current affordable inventory in the County, as well as to determine the gap in housing availability. HMIS data on the percentage of households exiting the homeless system to unknown or temporary destinations and rates of return to homelessness were also used to determine the availability affordable housing inventory. In addition, the County utilized United Way 2-1-1 data as well as stakeholder feedback to identify service needs for the County.

### **HOME-ARP** Activities

### Describe the method(s)that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The Lake County Office of Housing and Community Services will invite any Developer/Owner that is looking to apply for funding and/or other resources from the County for the new construction, substantial rehabilitation, and/or preservation of affordable housing to submit a proposal for funding. The proposed activity, including the proposed qualifying population(s) to be served, will be evaluated in accordance with the County's HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be considered. The County is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding. Should the County establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review. Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by County staff. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

#### Describe whether the PJ will administer eligible activities directly:

Lake County will not administer and oversee its eligible activities directly. Rather, it will enter into HOME Agreements with developers of HOME-ARP eligible projects, and execute subrecipient agreements with service providers, if any. The County will provide oversight and management of its developer and subrecipient agreements.

### If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Lake County will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0		
Acquisition and Development of Non- Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$1,751,168.00	0%	0
Non-Profit Operating	\$0	0 %	5%
Non-Profit Capacity Building	\$0	0 %	5%
Administration and Planning	\$ 309,029.00	15 %	15%

#### **Use of HOME-ARP Funding**

Total HOME ARP Allocation \$ 2,060,197
--

### Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. Lake County will distribute 85% of its HOME-ARP allocation to the development of affordable rental housing. An overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The County is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

### Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The affordable rental housing inventory in Lake County is severely limited, a challenge that existed long before, and has been exacerbated by, the pandemic. There is increased competition for fewer affordable units throughout the County. Privately owned units are no longer available for affordable housing in many places as landlords are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations. Shelters are widely unavailable in Lake County, so the capacity to provide immediate shelter for households experiencing homelessness is severely limited. Many families are sheltered in hotels which is costly. Due to lack of affordable inventory, it is increasingly challenging to move folks out of shelter into permanent housing. As such, the County's emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the County.

### **HOME-ARP** Production Housing Goals

### Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

It is anticipated that the County's HOME ARP funds will be used to create a minimum of five new units for the Qualifying Populations.

### Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

It is anticipated that the County's HOME ARP funds will be used to create a minimum of five new units for the qualifying populations. The County's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the County. It is expected that the HOME-ARP funds will leverage other federal, state, and local funds such as HOME, LIHTC, ARPA. Providing funds for rental housing production directly supports the advancement of that goal.

### Preferences

### Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Lake County will not establish a preference; all qualifying populations will be eligible to apply for assistance under the County's HOME-ARP assisted program(s). Any preferences established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

### If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No preferences are established.

### **Referral Methods**

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Lake County may use the Coordinated Entry System (CES) as an indirect referral source. That is, the CES will be used for intake, but will not be used to admit applicants directly to a HOME-ARP assisted project. Referrals from CES and other sources to the services provided by HOME-ARP will be received in chronological order.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be admitted in chronological order.

*If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):* 

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized to admit qualifying populations to projects.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be admitted in chronological order of application, regardless of referral source.

### Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Lake County is not establishing limitations on eligibility.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Lake County is not establishing limitations on eligibility.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable.

### **HOME-ARP** Refinancing Guidelines

Lake County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds. If the County determines that it will use HOME ARP for refinancing, the guidelines for doing so will be in conformance with the HOME-ARP program notice and will be submitted to HUD for review.

Appendix A: Consultation Appendix

Type of Organization	Contact Name	Title	Name of Organization Stakehole HOME-ARP A Lake Co	Ilocation Plan	Telephone	Email Address	Website
Type of Organization	Contact Name	Title	Name of Organization	Mailing Address	Telephone	Email Address	Website
Continuum of Care Serving Participating Jurisdiction							
January 19 3 p.m.	Barbara Wheeler	Executive Director	Mid Florida Homeless Coalition	1512 US-41, Inverness, FL 34450	352-860-2308	mfhc01@gmail.com	www.midfloridahomeless.org
	Maria AbdoulKarim	Director	Lake County Office of Housing & Community Services	P.O. Box 7800, Tavares, FL 32778	352-742-6548	maria.abdoulkarim@lakecountyfl.gov	lakecountyfl.gov
	Kelly	Executive Director	Haven of Lake & Sumter	202 South Street, Leesburg, FL 34748	352-787-5800		www.havenlakesumter.org
	Barbara Wheeler	Executive Director	Mid Florida Homeless Coalition	1512 US-41, Inverness, FL 34450	352-860-2308	mfhc01@gmail.com	www.midfloridahomeless.org
				415 Citrus Tower Blvd., Clermont, FL 34711		<u>Ininco (a/ginan.com</u>	
	Steve Smith	President	New Beginnings		352-404-6946		www.nbcfl.org
omeless Assistance	John Draxinger	Director	Samaritan Inn - Christian Care Center	115 N. 13th St., Leesburg, FL 34748	352-434-1832	johndraxinger@ChristianCareCenter.org	
Providers (inluding DV providers)	B.E. Thompson	Assoc. Vice Pres of Com		P.O. Box 491000, Leesburg, FL 34749-1000	352-589-8517		www.lsbc.net/open-door/
. ,	David Ell, COO or Emily	Office Manager	Catholic Charities of Central Florida - St. Luke Medical & Dental Clinic	722 S. Grove Street, Eustis, FL 32726	407-658-1818 ext 1007 352-602-4640		www.salvationarmyflorida.org/leesburg/
January 18 1 p.m.	Ruthy Watson	Director	Salvation Army - Lake & Sumter Counties	P.O. Box 491265, Leesburg, FL 34749	352-365-2540	info@ccstpaul.com	www.ccstpaul.com
January 18 3 p.m.	Lorenzo Lockett	Program Manager	St. Vincent DePaul (St. Paul Catholic Church)	1330 Sunshine Avenue, Leesburg, FL 34748	352-787-6354		
	Kirk Armstrong	Director	Lake County Office of Veteran's Services	P.O. Box 7800, Tavares, FL 32778	352-742-585	kirk.armstrong@lakecountyfl.gov	
	Linda D. Cowles	President	Anointed Community Services, Inc.	P.O. Box 121492, Clermont, FL 34712	352-404-7898	info@anointedcs.org	www.anointedcs.org
	Robert Redding	Program Administrator	Florida Department of Children & Families (DCF)	1300 S. Duncan Drive, Tavares, FL 32778	352-442-3737	robert.redding@myflfamilies.com	www.myflfamilies.com
	Helen Sneed	Interim CEO	United Way of Lake & Sumter Counties	32644 Blossom Lane, Leesburg, FL 34788	352-787-7530 ext. 225	ksneed@uwls.org	www.uwls.org_
Public Housing	Maria AbdoulKarim	Director	Lake County Office of Housing & Community Services	P.O. Box 7800, Tavares, FL 32778	352-742-6548	maria.abdoulkarim@lakecountyfl.gov	
Authorities Survev onlv	Horace J. Jones	Executive Director	Eustis Housing Authority	1000 Wall Street, #60, Eustis, FL 32726	352-357-4851	hjones@eustishousingauthority.com	
Survey only			Community Legal Services of Mid-Florida	226 W. Main Street, Tavares, FL 32778	352-343-0815		www.clsmf.org
Public or Private	Aaron Kissler	Administrator	Lake County Health Department	1140 US Highway 441, Eustis, FL 32726	352-589-6424	chd35webmaster@flhealth.gov	www.lake.floridahealth.gov
Agencies that			Community Medical Care Center	1210 W. Main Street, Leesburg, FL 34748	352-787-8489		www.leesburgregional.org
ddress Fair Housing,	Jonathan M. Cherry	President/CEO	LifeStream Behavioral Center	2020 Tally Road, Leesburg, FL 34748	352-315-7500	jcherry@lsbc.net	www.lsbc.net
Civil Rights and the			Mid-Florida Community Services	1211 Penn Street, Leesburg, FL 34748	352-326-3370		www.mfcs.us.com
eeds of persons with	Jill Brown	Director	Lake County Connection (public transportation)	P.O. Box 7800, Tavares, FL 32778	352-742-2612	jill.brown@lakecountyfl.gov	www.ridelakexpress.com/paratransit
disabilities			New Vision for Independence	9501 U.S. Highway 441, Leesburg, FL 34788	352-435-5040	info@newvisionfl.org	www.newvisionfl.org
	John Riehm	CEO	The Arc Sunrise of Central Florida	35201 Radio Road, Leesburg, FL 34788	352-787-3079	jriehm@sunrisearc.org	www.sunrisearc.org
January 19 1:00 p.m.	Darla Huddleston	Executive Director	e3 Family Solutions	1206 W. Main Street, Leesburg, Fl 34748	352-303-3885	darla@e3familysolutions.org	www.familysolutions.org
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### REAL FLORIDA · REAL CLOSE

## HOME-ARP ALLOCATION PLAN





- What is HOME ARP?
- Defining the Qualifying Populations
- Eligible Activities
- Discussion: Unmet Needs of the Qualifying Populations
- Wrap-up and Next Steps



# THE HOME-AMERICAN RESCUE PLAN (ARP)

# SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.

Provides \$5 billion of supplemental HOME funds to assist individuals or households who are homeless, at risk of homelessness and other vulnerable populations by providing housing, rental assistance, supportive services, and non-congregate shelter

### Lake County will receive \$2,060,197



## HOME-ARP QUALIFYING POPULATIONS

### Homeless

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

### **At-risk of Homelessness**

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

### **Domestic Violence**

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

### Other

In other populations where providing supportive services or assistance under section 212(a) of the Act (<u>42</u> <u>U.S.C. 12742(a)</u>) would prevent the family's homelessness or would serve those with the greatest risk of housing instability



## HUD HOME-ARP DEFINITION OF HOMELESS



an individual or family who lacks a fixed, regular, and adequate nighttime residence



an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation, including a car, park, abandoned building, bus or train station, airport, or camping ground



an individual or family living in shelter designated to provide temporary living arrangements



an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided



an individual or family who will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels



## HUD HOME-ARP DEFINITION OF AT-RISK HOMELESS



Multiple Moves: Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance



Doubled Up: Is living in the home of another because of economic hardship



Hotel/Motel: Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals



Overcrowded Housing: Lives in a single room occupancy (SRO) or efficiency apartment unit where two or more persons reside or where there are more than one-and-a-half persons per room



Exiting Institution: Is exiting a publicly funded institution or system of care (e.g., jail, prison, psychiatric hospital, etc.);



HOUSING

# HOME-ARP ELIGIBLE ACTIVITIES



HOUSING

COUNSELING



# DISCUSSION TOPICS

What do you see as the most critical gaps and needs in effective service delivery system?

What kinds of housing resources are most in demand?

What kinds of housing units are most in demand?

What supportive services are currently available? What should be available/what is needed?

What are the biggest risk factors for housing instability and maintaining permanent housing once attained?

How are providers currently serving rural or low-capacity areas? What could be done to better support those providers?

Are there any populations or subgroups that are underserved by the current system? What additional services would be beneficial?



# NEXT STEPS AND TIMELINE

Continue outreach with stakeholder groups

Draft Allocation Plan through February

Public Display in February-March

**Commissioner Approval March 28** 

Submit to HUD by March 31 deadline



# REAL FLORIDA · REAL CLOSE

### HOME ARP: Lake County, FL Public Housing Authorities Consultation Questions

### PHA Name Housing Authority of the City of Eustis (dba) Eustis Housing Authority

### Respondent's Name/Email Horace J. Jones / hjones@eustishousingauthority.com

• What is your public housing inventory, if any?

Public Housing Units – 60 Rural Development Units – 56 Affordable Housing – Pre-development activities have been initiated

• How many HCVs do you have budget authority to issue? N/A

### HCV is administered by Lake County (Office of Housing and Community Services)

- Please tell us about your waiting lists:
  - Public Housing
    - Number of households **38**
    - How long of a wait Approximately 1 year
    - Bedroom size most in demand 1 and 3 BR
  - Housing Choice Voucher N/A
    - Number of households
    - How long of a wait
    - Bedroom size most in demand
- Do you have any preferences?
  - Public housing Homeless preference awaiting board approval
  - o HCV
- What, if any, obstacles do you experience when placing households with preferences into units? Can't determine at this time, as the preference policy has not been implemented yet.
- What is your Housing Choice Voucher utilization rate? If low, why? N/A
  - Do voucher holders have a difficult time finding a unit in the market? Why?
  - How frequently are vouchers returned due to inability to identify units?
  - Over the last year, have landlords been leaving the Housing Choice Voucher program? Why?
  - Has the current housing rental market made it more difficult to recruit landlords to your voucher program? What's the main reason?
  - Are FMRs adequate in your service area to attract and keep landlords in your HCV program?
- What are your payment standards? N/A

• Do you have the ability to project-base any vouchers? Not at this time.

If so, what is your Authority's capacity to project base?

• Does your authority have a Family Self Sufficiency Program, and what are the services offered under the program? What is your participation rate in FSS?

The Eustis Housing Authority will be submitting a FSS application to HUD in 2023. Activities and services are in the planning stages and have not been finalized

### Shelter Providers

- There is insufficient housing for populations with mental health/substance misuse and other disabling conditions. Inventory is low, but supportive housing and housing with supervision is needed for these populations.
- Permanent Supportive Housing is a need
- Landlord created barriers to housing include requiring 2 or 3x rent for security deposit; requiring 2-3x rent as minimum monthly income.
- Barriers also include poor rental history, criminal history. When case managers are involved, mental health, substance misuse are less of a barrier to housing.
- Many facilities (shelters) not equipped to assist someone with SMI residential/inpatient not available; outpatient is only available and consumers don't commit to level of care that they need

## Service Providers

- Accessibility to services is a challenge. While many consumers are difficult to engage, location of services and transportation options to get to services make access to the services difficult. Location is everything and coupling together resources/uses in a way that is smart, safe and conducive to recovery is ideal
- Locating housing near grocery, transportation, health care facilities is a priority. Rural housing is most affordable, but is less accessible to these.
- Overcrowding is a challenge due to affordability.
- Most units needed are 1-2 bedroom; some demand for larger units.
- In home services to help achieve stability include general housekeeping, financial literacy, employment services. There is a gap in availability/capacity to provide these at the level needed
- Subpopulations identified include those with mental health/substance misuse; elderly; those with disabling conditions; domestic violence survivors/fleers; chronically homeless
- Labor trafficking is more prevalent than sex trafficking
- Housing First isn't the appropriate intervention for some populations, especially when services are only available as long as housing assistance is available (RRH)
- Most stable populations have mental health counseling and financial literacy, housekeeping.
- Person-centered approach to ICM is needed
- There are many households who have working heads of household, but wages are such that they can't afford housing, so are staying in hotel
- Street Outreach to place people into permanent housing is an unmet need
- Services needed include MH/Behavioral health; primary healthcare; services on site of housing is most effective

### **Domestic Violence Providers**

- Transitional Housing is an effective housing model for fleers. Often, fleers need employment and other supports; individuals come in form unsafe homes, uncertain about going to apt complexes, less secure homes
- Many landlords are increasing rents by too much; if they have an opportunity to collect 2-3x security deposit from fed programs, they do, but are evicting/increasing rents/not renewing leases because they can.

- Many fleers are also victimized by providers
- Services are a need. If other resources are available for construction that HOME ARP can be used for services or other things
- Security is needed for vulnerable populations, but due to lack of inventory, often affordability is considered first, then safety

### Fair Housing/Civil Rights

- Most clients (not just Lake) in Central FL experiencing eviction because of rental prices increasing and clients can't afford rents. There is an emerging pattern of households renting just one room in a house, still experiencing eviction. Many are working, but can't afford the increasing rental costs.
- Emergency rental assistance is a need
- FL Court-even when client has good defense, when eviction is filed, client chooses not to challenge to eviction because they have to deposit the amount to court registry (won't be able to challenge the eviction because they can't make deposit)
- If a tenant decides not to pursue eviction (other departments refer to shelter or other financial assistance), legal aid does not track tenant. There are some that do shift units and receive some assistance. But shelter assistance is limited, so even referrals made there is no shelter available.
- DV have more options in terms of finding shelter than others needing shelter.
- Elderly rentals and subsidized housing recipients are highly impacted because they're on fixed income and can't afford the increase in prices

### Public Housing Agency/Authorities

- Public Housing waiting list takes about a year
- Eustis HA is proposing a homeless preference; no other preferences are identified
- The Eustis Housing Authority will be submitting a FSS application to HUD in 2023. Activities and services are in the planning stages and have not been finalized
- Eustis does not administer HCV-they are administered solely by Lake County OHCS

Appendix B: Citizen Participation



Daily Commercial | Ocala StarBanner News Chief | Herald-Tribune

#### **PROOF OF PUBLICATION**

Jeannine Nelson, Lake County Board Of County Commissioners Po Box 7800 Tavares FL 32778-7800

#### STATE OF FLORIDA, COUNTY OF LAKE

The Daily Commercial, a newspaper printed and published in the city of Leesburg, and of general circulation in the Counties of Lake and Sumter, State of Florida, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated or by publication on the newspaper's website, if authorized, on:

#### 02/23/2023

and that the fees charged are legal. Sworn to and subscribed before on 02/23/2023

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### THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

NOTICE OF PUBLIC HEARING LAKE COUNTY, FL HOME-ARP ALLOCATION PLAN Lo información será proporcionada en espoñol o polición. Notice is hereby given that Lake County, FL (County) hos prepared its HOME-ARP Allocation Plan. This Plan describes how lhe County Inlends to allocate \$2,060,197 in HOME-ARP funds, authorized by the American Rescue Plan in April 2021.

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Lone, Tavares, FL 32778, and online of https://www.lakecountyfl.gov/housin arcommunity-black-protein The Plen will be available for a peried of difteen days beginning March 3, 2023, and ending March 17, 2022. Notice 1s also given that Loke County will conduct a public hearing an March 9, 2023, off 109 Hom, and had Community Services. Persons wishing to loin withouthy may do so by clicking on the following the link: https://us92web.zoom.us/#594399732

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PO Box 631244 Cincinnati, OH 45263-1244

MARIAH VERHAGEN Notary Public State of Wisconsin



REAL FLORIDA · REAL CLOSE

# HOME ARP ALLOCATION PLAN

Public Hearing March 9, 2023



# THE HOME-AMERICAN RESCUE PLAN (ARP)

Provides \$5 billion of supplemental HOME funds targeted to individuals or households who are homeless, at risk of homelessness

These are separate from other ARPA funds the County received and may have allocated to housing and services

County's HOME-ARP allocation is **\$2,060,197** 

Deadline for submitting HOME-ARP Allocation Plan is March 31, 2023

Deadline for spending HOME-ARP funds is September 2030



# OVERVIEW OF PLANNING PROCESS



COUNTY CONDUCTED FOCUS GROUP SESSIONS TO TARGETED STAKEHOLDERS ANALYZED NUMEROUS DATA SOURCES TO IDENTIFY THE PRIORITY NEEDS OF THE QUALIFYING POPULATIONS

DEVELOPED HOME-ARP BUDGET BASED ON PRIORITY NEEDS AND OTHER RESOURCES AVAILABLE TO THE COUNTY



# QUALIFYING POPULATIONS

# Homeless

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

# **At-risk of Homelessness**

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

# **Domestic Violence**

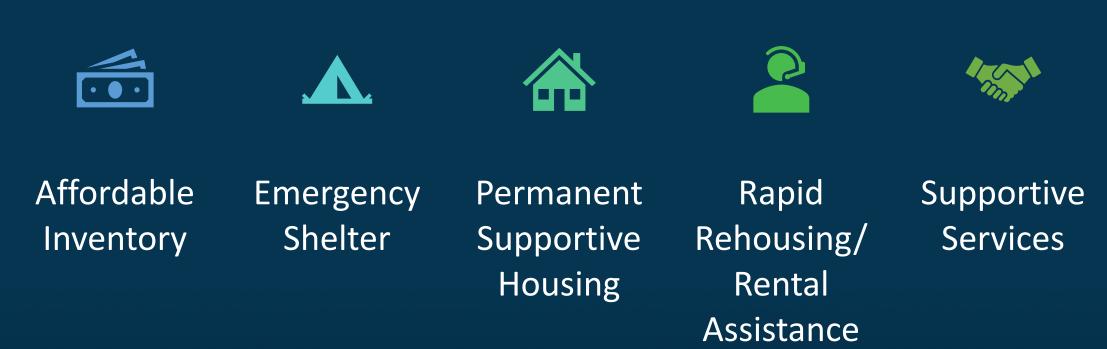
Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

# Other

In other populations where providing supportive services or assistance under section 212(a) of the Act (<u>42</u> <u>U.S.C. 12742(a)</u>) would prevent the family's homelessness or would serve those with the greatest risk of housing instability



# STAKEHOLDER IDENTIFIED NEEDS





- Annual income needed to afford 2BR units at FMR is insufficient:
  - 2 BR FMR \$1,190
  - Income needed \$47,590
  - Income for household of 3 at 30% AMI \$22,400
- Housing Gap for HH at 30% AMI: 4,555



- Approximately half of the population that exited the homeless system in 2022 exited to a permanent housing destination
- High number of unsheltered homeless households in Lake County (72% homeless adults are unsheltered)
- Subpopulations identified include chronically homeless



# NEXT STEPS AND TIMELINE

# Public Display continues through March 17

# **Commissioner Approval March 28**

# Submit to HUD by March 31 deadline



# PROPOSED HOME-ARP BUDGET

\* Proposing minimum 8 new affordable rental units

\*\* Limited to 15% of total grant

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$1,751,168.00	0%	0
Non-Profit Operating	\$ O	0 %	5%
Non-Profit Capacity Building	\$0	0 %	5%
Administration and Planning	\$ 309,029.00	15 %	15%
Total HOME ARP Allocation	\$ 2,060,197.00		



# QUESTIONS OR COMMENTS



# REAL FLORIDA · REAL CLOSE

Appendix C: SF424s/Certifications

# **RESOLUTION NO. 2023-<u>34</u>**

#### A RESOLUTION OF THE BOARD OF COMMISSIONERS OF LAKE COUNTY, FLORIDA; APPROVING A SUBSTANTIAL AMENDMENT TO THE FY 2021 ACTION PLAN AND THE HOME-ARP ALLOCATION PLAN.

WHEREAS, under the Home Investment Partnerships Program created by the National Affordable Housing Act of 1990 (NAHA) as amended by the Housing and Community Development Act of 1992, the Secretary of the U.S. Department of Housing and Urban Development is authorized to extend financial assistance to participating jurisdictions to expand the supply of decent, safe, sanitary and affordable housing; and

WHEREAS, under the HOME-ARP Program created by the American Rescue Plan of 2021, the Secretary of the U.S. Department of Housing and Urban Development is authorized to extend financial assistance to participating jurisdictions to expand the supply of decent, safe, sanitary and affordable housing; and

**WHEREAS**, the U.S. Department of Housing and Urban Development has advised the County that it is eligible to receive \$2,060,029 for the HOME-ARP Program; and

**WHEREAS**, the Office of Housing and Community Services made a draft HOME ARP Allocation Plan available for public review for a period of fifteen days; and

WHEREAS, on March 9, 2023, the Lake County Office of Housing and Community Services held a public hearing to obtain comments on the draft Allocation Plan; and

WHEREAS, any comments received during the comment period or the public hearing have been incorporated into the final Allocation Plan.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Commissioners of Lake County, being the governing body thereof, as follows:

Section 1. <u>Recitals.</u> The above recitals are hereby adopted as legislative findings of the Board of County Commissioners and are ratified and confirmed as being true and correct and are hereby made a specific part of this Resolution upon adoption hereof.

Section 2. <u>Authorization</u>. The Director of the Office of Housing and Community Services, on behalf of the Lake County Board of County Commissioners is authorized to file an application for financial assistance with the U.S. Department of Housing and Urban Development for this grant.

Section 3. Assurances. The Director of the Office of Housing and Community Services, on behalf of the Lake County Board of County Commissioners, is hereby authorized to provide such assurances and certifications as required by the National Affordable Housing Act of 1990, as amended, the American Rescue Plan of 2021, and any supplemental or revised Resolution 2023-224 Resolution approving a substantial amendment to the FY2021 action plan and the Home-ARP Allocation Plan

data which HUD may request in connection with the review of this application.

<u>Section 4.</u> <u>Formal Grants.</u> Maria AbdoulKarim, Director of the Office of Housing and Community Services, or her designee is authorized to sign the Lake County's HOME ARP Allocation Plan grant, application, certifications, assurances, reimbursement invoices, warranties, agreements, and any other required documents, and purchase equipment, and expend grant funds pursuant to a grant award after acceptance of the grant by Board of County Commissioners. However, Melanie Marsh, County Attorney, is the only person authorized to submit certifications and assurances that are required to be submitted by an authorized attorney of Lake County as a grant applicant.

<u>Section 5.</u> <u>Severability.</u> If any section, sentence, clause, or phrase of this Resolution is held to be invalid or unconstitutional by any court of competent jurisdiction, the holding will in no way affect the validity of the remaining portions of this Resolution.

Section 6. Effective Date. This Resolution will take effect upon approval by the Lake County Board of County Commissioners.

**PASSED AND ADOPTED** this 28<sup>th</sup> day of March 2023.

BOARD OF COUNTY COMMISSIONERS OF LAKE COUNTY, FLORIDA

Kirby Smith, Chairman

ATTEST:

Gary J. Cooney, Clerk

Board of County Commissioners of Lake County, Florida

Approved as to form and legality:

unmoush 3/28/2023

Melanie Marsh County Attorney

#### **HOME-ARP CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --- The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan --**It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction --**The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Authorized Official

Signature of

<u>3.18.25</u> Date

Director, Office of Housing and Community Services Titla

OMB Number: 4040-0004

-

Expiration Date: 12/31/2022	2
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Application for Federal Assistance SF-424				
	on: icted Application	* 2. Type of Application:		Revision, select appropriate letter(s): ther (Specify):
* 3. Date Received:		4. Applicant Identifier: HOME ARP		
5a. Federal Entity Ide	ntifier:		л I г	5b. Federal Award Identifier: M-21-UP-12-0223
State Use Only:				
6. Date Received by s	State:	7. State Applicatio	n Ide	ntifier:
8. APPLICANT INFO	ORMATION:			
* a. Legal Name: $I_{Li}$	ake County			
* b. Employer/Taxpay	er Identification Nur	mber (EIN/TIN):	,	* c. UEI:
596000695				NNPSKT8GRCU1
d. Address:				
* Street1:	315 W Main St	reet		
Street2:				
* City:	Tavares			
County/Parish:	/Parish:			
* State:	FL: Florida			
Province:		· · · · · · · · · · · · · · · · · · ·		
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e. Organizational U	nit:	an a	<del></del>	
Department Name:				
Housing and Community Services				
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix: Ms.		* First Nar	ne:	Maria
Middle Name:				
	loulKarim			
Suffix:				
Title: Director				
Organizational Affilia	tion:			
Lake County				
* Telephone Number: 352-742-6540 Fax Number:				
* Email: maria.abdoulkarim@lakecountyfl.gov				

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
B: County Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
US Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239
CFDA Title:
HOME Investment Partnership Program
* 12. Funding Opportunity Number:
14.239
* Title:
HOME Investment Partnership Program
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
HOME ARP
Attach supporting documents as specified in agency instructions.
Add Attachments         Delete Attachments         View Attachments

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
* a. Applicant 010 * b. Program/Project 010			
Attach an additional list of Program/Project Congressional Districts if needed.			
Add Attachment Delete Attachment View Attachment			
17. Proposed Project:			
* a. Start Date: 04/01/2023 * b. End Date: 09/30/2030			
18. Estimated Funding (\$):			
* a. Federal 2,060,197.00			
* b. Applicant			
* c. State			
* d. Local			
* e. Other			
* f. Program Income			
* g. TOTAL 2,060,197.00			
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
a. This application was made available to the State under the Executive Order 12372 Process for review on			
b. Program is subject to E.O. 12372 but has not been selected by the State for review.			
C. Program is not covered by E.O. 12372.			
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
Yes No			
If "Yes", provide explanation and attach			
Add Attachment         Delete Attachment         View Attachment			
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)			
$\bowtie$ ** I AGREE			
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency			
specific instructions.			
Authorized Representative:			
Prefix: Ms. * First Name: Maria			
Middle Name:			
* Last Name: AbdoulKarim			
Suffix:			
* Title: Director, Office of Housing & Community Svcs			
* Telephone Number: 352-742-6548 Fax Number:			
* Email: maria.abdoulkarim@lakecountyfl.gov			
* Signature of Authorized Representative:			

#### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

#### PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

   (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
   which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

**Previous Edition Usable** 

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Standard Form 424B (Rev. 7-97) Prescribed by OMB Circular A-102

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
M. Abdall Karin	Director, Office of Housing & Community Svcs
APPLICANT NAME	DATE SUBMITTED
Lake County	3.18.23

Standard Form 424B (Rev. 7-97) Back

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

### PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- 6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to; (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
HUlbahllKaren	Director, Office of Housing & Community Services
APPLICANT ORGANIZATION	DATE SUBMITTED
Lake County	3.28.23

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