



Marc Elrich
County Executive

Aseem K. Nigam
*Director, Department of Housing
and Community Affairs*

Montgomery County, Maryland

HOME-ARP Allocation Plan Amendment to Annual Action Plan Federal Fiscal Year 2021 County Fiscal Year 2022 July 1, 2021 to June 30, 2022

Any Questions or Comments should be directed to:

Katherine Canales, Senior Planning Specialist

Katherine.Canales@montgomerycountymd.gov

Tara Whicker, Program Manager

Tara.Whicker@montgomerycountymd.gov

The TTY number (for the hearing impaired) is 711
Information is available in alternate formats upon request.



*Montgomery County is committed to foster the
letter and spirit of Equal Housing Opportunity.*

On March 11, 2021, President Biden signed American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. From that, \$5 billion has been appropriated by Congress for homelessness assistance and supportive services through the HOME program

Montgomery County's HOME-ARP Allocation Plan outlines the usage of \$7.3 million of these funds to address the housing needs of persons who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness. All interested parties are invited to submit comments on the Allocation Plan.

Written statements were accepted via US mail or by email until **September 29, 2022**, addressed to:

Aseem K. Nigam, Director
Department of Housing & Community Affairs
1401 Rockville Pike, 4th Floor
Rockville, Maryland 20852-1428
Aseem.Nigam@montgomerycountymd.gov
Telephone: 311; TTY number (for the hearing impaired) is 711

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MONTGOMERY COUNTY HOME-ARP ALLOCATION PLAN

CONSULTATION SUMMARY

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The Montgomery County Department of Housing and Community Affairs (DHCA) consulted with local non-profit organizations, community leaders, and stakeholders that serve or are knowledgeable about the needs of the qualifying populations. Qualifying populations are defined as those experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking and those other populations for whom supportive services would prevent homelessness. The Montgomery County Department of Health and Human Services played a key role in developing this Plan through the Montgomery County Continuum of Care (CoC), a partnership of public and private groups working to prevent and end homelessness in Montgomery County.

DHCA reached out to consult with local organizations that serve the needs of the qualifying populations in the County primarily by means of a survey tool (see Appendix) to gather information regarding homelessness in the County and suggestions for how to address the issue. The groups that participated in this consultation process are mainly members of the Montgomery County CoC, each of whom received a HOME-ARP survey to complete (see Appendix). DHCA developed and distributed this survey to 94 individuals representing 60 different entities. The survey collected information regarding communities served, demographic breakdown, common barriers, and possible solutions. Montgomery County used the information gathered through the survey, data collection, and public participation to develop the HOME-ARP Allocation Plan.

The County received 43 survey responses from 35 organizations and government agencies. Twenty-nine of the responses came from non-profit organizations and 11 from government agencies including the County's Public Housing Authority, the Housing Opportunities

Commission (HOC) and Rockville’s Public Housing Authority, Rockville Housing Enterprises (RHE). Three came from other organizations involved in serving the eligible populations.

Most of the respondents served multiple, if not all, categories within the qualifying populations. (Table 1). Approximately half of the participating groups serve individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking and half served veterans. One organization had a focus specifically on serving victims of domestic violence and two focused primarily on fair housing and civil rights issues. Three respondents specialized on the needs of persons with disabilities, and one solely on veterans.

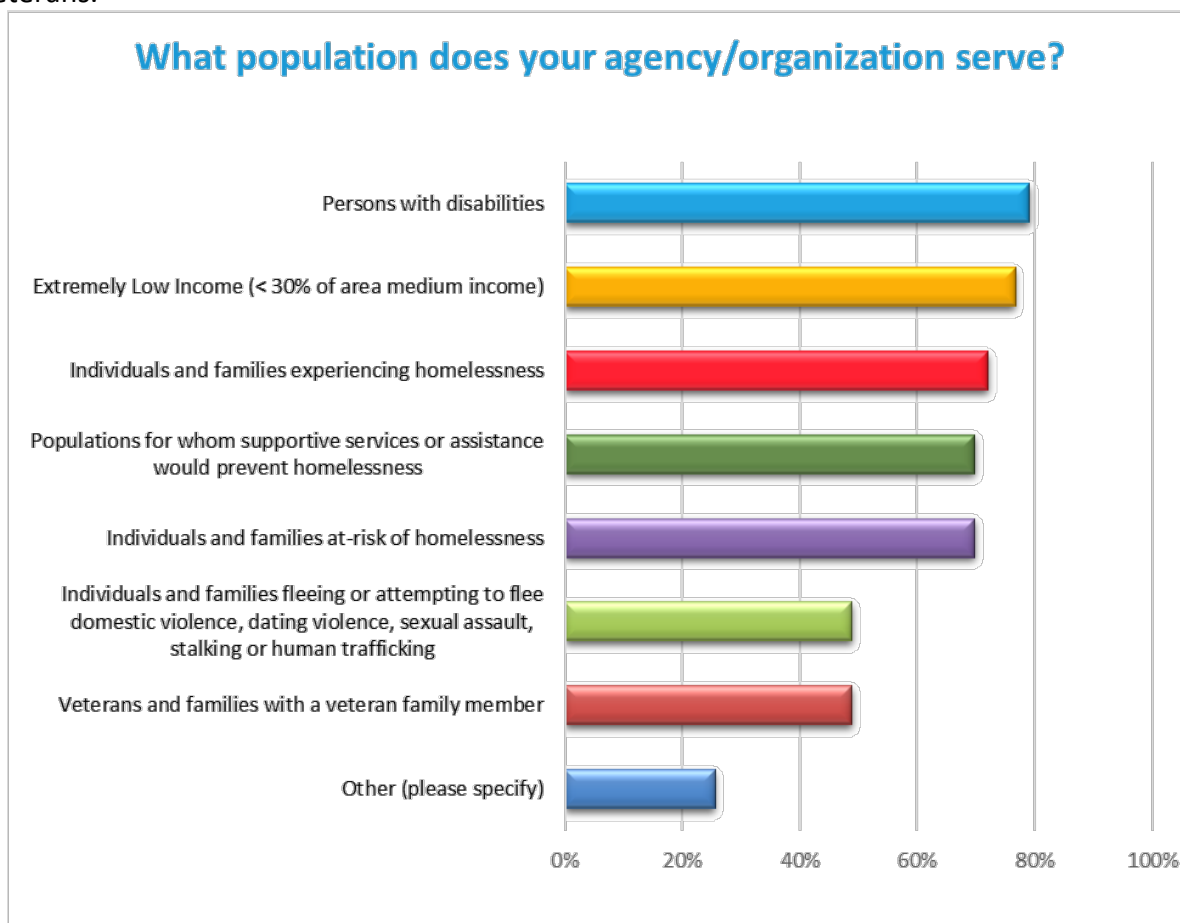


Table 1: HOME-ARP Consultation Survey

ORGANIZATIONS CONSULTED & FEEDBACK SUMMARY

Of the respondents, 38 out of 43 (or 88%) said that race and ethnicity clearly play a role in housing instability whether through direct discrimination or from the effects of systemic and historic racism that have translated into disproportionate levels of poverty, homelessness, and financial instability (lower wages, employment discrimination) for people of color and non-English speakers.

Eighty-eight percent of the responses listed “extremely affordable rental housing” as an unmet housing need, followed by 67% choosing “supportive services to prevent homelessness” (Table 2). Ninety-three percent of respondents believed that lack of affordable housing is the number one contributing factor to unmet housing needs. The other top contributing factors are unemployment/underemployment at 77% and discrimination at 60%.

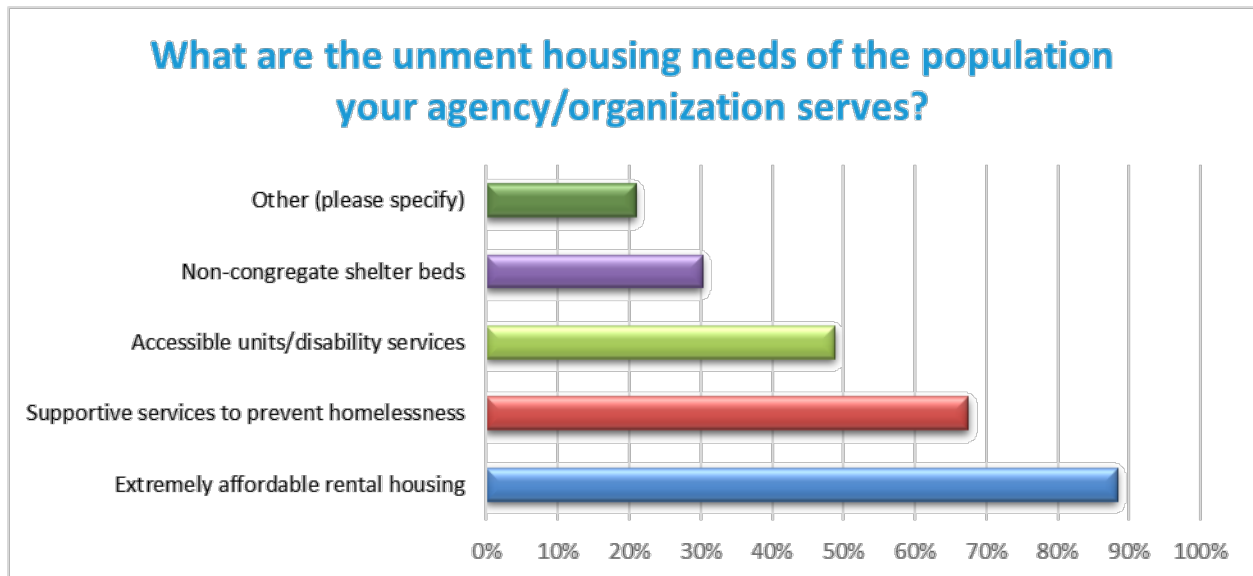


Table 2 HOME-ARP Consultation Survey

With these unmet needs in mind, the respondents provided feedback regarding recommended priorities to better serve the qualifying populations. Nearly half, or 44%, ranked additional development of extremely affordable rental housing as their top priority while 23% selected additional permanent supportive housing. The remaining survey results prioritized additional need for rental assistance, supportive services, transitional, emergency, or non-congregate shelter, and accessible housing.

Both the Public Housing Authorities serving County residents (HOC and RHE) identified that the unmet housing needs of the qualifying populations served are the lack of extremely affordable rental housing, supportive services to prevent homelessness and discrimination. In the City of Rockville specifically, the top three factors contributing to the housing gap are lack of affordable housing, deficiency of available housing and unemployment or underemployment. According to HOC, the main factors contributing to the housing gap are lack of affordable housing, discrimination, and unemployment.

The following chart indicates all 35 responding organizations and agencies with their focus area and their comments regarding the situation faced in the County by members of the qualifying populations. Note that an asterisk * after the name indicates additional responses from different sections of that organization.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
1. Ayuda*	Provides legal, social, and language services to help low-income immigrants in our neighborhoods access justice and transform their lives.	Survey	The unmet housing needs of the population are supportive services to prevent homelessness and affordable rental housing
2. Latino Economic Development Center	Our mission is to drive the economic and social advancement of Low-to-moderate income Latinos and other underserved communities.	Survey	Non-congregate shelter beds and accessible units/disability services are some of the unmet housing needs of the population
3. Equal Rights Center	Is a civil rights organization that identifies and seeks to eliminate unlawful and unfair discrimination in housing, employment and public accommodations in greater Washington, DC and nationwide.	Survey	Substandard housing conditions in affordable housing; barriers to enforcement efforts of housing discrimination laws
4. NAMI Montgomery County	Provides support, education, public awareness, and advocacy so that all individuals and families affected by mental illness can build better lives.	Survey	Supportive housing for living with mental illness is one of the unmet housing needs
5. Interfaith Works**	Is a nonprofit that helps people living in Montgomery County who are experiencing homelessness or living in poverty.	Survey	For individuals who receive vouchers (permanent supportive housing) they are aging in place. 1/3 of our clients in our community supportive housing programs are over the age of 65. Our clients have documented disabilities much of which is mental health and are on fixed income with SSI/SSDI. We have challenges engaging with APS with older adults with mental health/behavioral concerns. There

			<p>are no supportive/full time staff group homes or long-term congregate living that are designed for older adults with severe mental illness. We are often told that our older adults who need staffed facilities are too mentally ill to be accepted at facilities for the aging population. There is a gap in services for this population (elderly individuals with severe and persistent mental illness) that will continue to need support and services before needing a long-term care facility. I believe increased resources to homeless diversion and prevention would be more cost effective than growing our shelters. There is inadequate access to housing subsidies from the local housing authority for people experiencing homelessness, and even when households are chosen for a housing voucher, the process is bureaucratic and difficult to navigate for both clients and workers. This is a huge barrier to housing. There needs to be better transitions from institutions to the community. Poorly planned discharges from hospitals and other institutional settings continue to contribute to significant inflow into the homeless system. There are not adequate ACT teams and residential crisis services to meet the behavioral health needs of the most vulnerable individuals entering the system, which exacerbates the lack of stability of those experiencing homelessness.</p>
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			Lastly, there needs to be more site/facility-based supportive housing for very vulnerable individuals who need intensive support
6. Stepping Stones Shelter	Provide support to homeless families with children in order to move them from crisis to a stable home environment by providing temporary shelter and services.	Survey	Supportive services to prevent homelessness and extremely affordable rental housing are the unmet population needs
7. Upper Montgomery Assistance Networks	Our mission is to prevent homelessness, help families prevent the loss of a vital utility service, support people in housing transition, and educate and empower people in crisis.	Survey	Montgomery County needs rental units that are safe and stable for residents earning 30% and below of area AMI
8. The Mobile Dentist	Provides services to residents in nursing homes, military bases, senior living communities, assisted living facilities and any group that requires on-site dental care.	Survey	Unemployment and under-employment are factors that contribute to the housing gap
9. Sheppard Pratt/Family Services	Offers help for individuals experiencing homelessness.	Survey	Even in our fairly progressive County, there is significant housing discrimination. It even relates to wages-- we pay minorities less than whites, so they are unable to afford improved housing
10. Bethesda Cares, Inc	Our mission is to prevent, ease and end homelessness in our community.	Survey	It is more difficult for racial and ethnic minorities to obtain loans. A lack of social support more easily allows minorities to become evicted or to become homeless. If homeless, it is more difficult to obtain PSH for minority individuals

11. Housing Opportunities Commission*	The mission is to provide affordable housing and supportive services that enhance the lives of low-and moderate-income families and individuals throughout Montgomery County.	Survey	Some of the factors that contribute to the housing gap are lack of affordable housing, discrimination, and unemployment
12. Cornerstone Montgomery*	We specialize in the provision of comprehensive, community-and evidence-based mental health and co-occurring mental health and substance use disorder treatments and interventions.	Survey	Additional development of extremely affordable rental housing is one way to address housing needs
13. The Coordinating Center	The mission is to partner with people of all ages and abilities and those who support them in the community to achieve their aspirations for independence, health, and meaningful community life.	Survey	The extremely affordable housing available now is often less than adequate. Housing (set up in a learning/goal-oriented way) easy access to mental health, collaboration between siloed areas of the county-fixing this would give providers a more holistic way to serve
14. The National Center for Children and Families	Our mission is to value and acknowledge every human being and the community that promotes and fosters their well-being.	Survey	Yes, disproportionately black, and Latino families experience homelessness and seek services to end in prevent homelessness in Montgomery County, than any other population.
15. Jewish Coalition Against Domestic Abuse (JCADA)	JCADA's vision is to create a world free from intimate partner violence and upend power structures that perpetuate the continuation of that violence.	Survey	Our clients are all suffering from financial abuse and lack of home ownership, usually do not have their name on a lease or mortgage and are either not allowed to work or have all their funds controlled by their abusive spouse. This happens across all races and ethnicities.

16. Montgomery County Maryland Office of Human Rights	Investigates incidents of hate/violence and complaints of discrimination.	Survey	Housing needs to become a core value of the community. Available, affordable, accessible, and near transportation and other high value amenities
17. Ministries United Silver Spring/Takoma Park (MUSST)	Mission is to assist economically disadvantaged clients in the lower Silver Spring and Takoma Park area in MC.	Survey	Lack of affordable housing, accessible units, and lack of available are some of the factors that contribute to the housing gap
18. WUMCO Help	Is a not-for-profit corporation dedicated to providing quick and friendly emergency assistance to needy residents in upper Montgomery County.	Survey	Supportive services to prevent homelessness are the housing needs of the population
19. Pathway to Housing DC	The mission is to end homelessness and support recovery for people with complex health challenges.	Survey	The factors that contribute to the housing gap are unemployment, lack of supportive services and affordable housing
20. Community Reach of Montgomery County	We seek to improve the quality of life for the most vulnerable MC residents by providing them with basic health and human services and advocating on their behalf, with the goal of helping them achieve and maintain self-sufficiency.	Survey	Continue offering financial assistance before families receive eviction notices. Add budgeting education. Increase opportunities for job readiness and education. Increase availability of housing vouchers. Increase childcare assistance. More access to food assistance that includes culturally appropriate and choice food. Increase affordable care options for seniors who need some daily living assistance
21. Services to End and Prevent Homelessness	Provides conflict resolution, mediation, financial assistance, housing location and case management to county residents at risk of experiencing homelessness.	Survey	What was not mentioned was low-cost childcare services or childcare subsidy increases so that income can be utilized for housing needs. Also, lack of affordable and available housing contributes to

			the housing gap in Montgomery County
22. Rockville Help	Our mission is to provide emergency financial assistance and other aids as needed to residents.	Survey	Extremely affordable rental housing and supportive services to prevent homelessness are the unmet needs
23. Mid-County United Ministries (MUM)	Our mission is to help people in crisis in some Montgomery County communities with food, medicine, eviction prevention and utilities, emphasizing client choice, problem-solving and self-sufficiency.	Survey	Prepare for the inevitable decreases in federal funds as the pandemic will eventually recede. Based on our experience after the economic downturn around 2008, the poor and vulnerable will take much longer to stabilize and recover economically than those that have higher earning potential
24. HHS Montgomery County*	We are responsible for public health and human services that helps address the needs of our community's most vulnerable children, adults and seniors.	Survey	Very low barrier housing for the severe mentally ill singles, in addition to housing our elderly-group homes or apartments for elderly with disabilities are some of the unmet housing needs of the population
25. Homelessness Outreach with EveryMind	Our mission is to strengthen communities and empower individuals to reach optimal mental wellness.	Survey	The inability to even apply for units with a voucher in hand has risen significantly recently. Applicants cannot even apply if they don't show proof of 3x-4xs the rental amount. This completely excludes PSH, vouchers or most low-income individuals who could pay rent but don't meet credit or income application requirements. Many more properties are implementing these at a higher rate than I've ever seen before. Many currently housed individuals are also receiving nonrenewal notices, making them have to hunt for a

			new unit when few to none are available. Until legislation prevents property managements from these barriers to apply, this will be a growing trend and hugely concerning to voucher programs, PSHs and any low-income individuals
26. Bethesda Help, Inc	We provide critical safety net services, food assistance and limited financial assistance to those in need who reside within our service areas.	Survey	Lack of affordable and available housing contribute to the housing gap in Montgomery County
27. Department of Housing and Community Affairs (DHCA)	The mission of DHCA is to plan and implement activities which prevent and correct problems that contribute to the physical decline of residential and commercial areas; maintain a marketplace which is fair to both landlords and tenants; increase the supply of new affordable housing; maintain existing housing in a safe condition, and support community programs that benefit our residents.	Survey	Lower wages, along with historical discrimination may prevent certain groups from owning homes and building wealth. This means that people of color are more likely to rent and are likely to struggle affording that rent
28. Montgomery County Coalition for the Homeless	Our vision is to end homelessness in Montgomery County by building a community where everyone has a safe, stable, and affordable place to call home.	Survey	We can end homelessness. we need more affordable housing and more supportive services to make this a reality.
29. Maryland's Commitment to Veterans	We help any Veteran, regardless of discharge, regardless of when they served and all of their family members.	Survey	Extremely affordable rental housing and supportive services to prevent homelessness are some of the housing unmet needs of the population

30. City of Rockville	Our vision is to ensure that current and future Rockville residents have a diverse array of quality housing choices that are affordable and livable, at all socio-economic levels.	Survey	Affordable and available childcare is directly related to parents being able to work consistently so that they can afford even extremely affordable housing. Uncontrolled rent increases are pricing too many residents out of the rental market - which is especially detrimental to seniors/disabled individuals on a fixed income and undocumented immigrants who cannot easily increase their income. *Note that the age ranking question is a guestimate because our annual REAP reports do not track age in the demographic information.
31. MNCPPC Montgomery Parks	The Maryland-National Capital Park and Planning Commission (M-NCPPC) has endeavored to improve the quality of life for all of the citizens of the bi-county area it serves and of the communities in which these citizens live, work and raise their families.	Survey	Additional accessible housing and transitional, emergency or non-congregate shelter are some suggestions on how to address the unmet housing needs of the population.
32. City of Takoma Park	To strengthen our community by providing services and facilities to city residents.	Survey	Extremely affordable rental housing, supportive services to prevent homelessness and accessible units/disability services are some of the housing unmet needs of the population
33. Montgomery County Commission on People with Disabilities*	The Commission provides advice, counsel, and recommendations to the Government of Montgomery County in general, and the County Executive, and the County Council in particular.	Survey	Persons with disabilities are the most discriminated group when it comes to housing needs. Accessibility is ALWAYS overlooked, whether it's building units for retail sale or developing affordable housing with reduced cost metrics. Accessibility is simply

			left out of the equation, and ADA codes are rarely met, other than entrance widths and grab bars.
34. Independence Now*	Our VISION is that people with disabilities live independent and fully inclusive lives and are recognized by society as equal.	Survey	Lack of affordable housing and available adequate shelter beds are some factors that contribute to the housing gaps in the county.
35. American Speech-Language-Hearing Association	Empowering and supporting audiologists, speech-language pathologists, and speech, language, and hearing scientists through advancing science, setting standards, fostering excellence in professional practice, and advocating for members and those they serve.	Survey	Lack of affordable housing, lack of available housing and lack of accessible units are some factors that contribute to the housing gaps in the county.

PUBLIC PARTICIPATION

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

The amount of HOME-ARP the PJ will receive,
The range of activities the PJ may undertake.

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:

Public comment period:

The HOME-ARP Allocation plan draft was made available for public review and comment on Monday August 29, 2022. The digital version of the plan was accessible through DHCA’s website and hard copies were available upon request at the Department of Housing and Community Affairs’ office. No comments or feedback were received as of September 29, 2022. The final approved version of the Allocation Plan will be uploaded to DHCA’s webpage for public access.

start date – Monday August 29, 2022

end date – Thursday September 29, 2022

Public hearing:

The first Public Hearing where the HOME-ARP information was introduced, was held on October 6, 2021, at 7pm via teleconference using Microsoft Teams. The second Public Hearing was held on April 27, 2022, at 7pm via teleconference using Zoom Webinar software.

The first public hearing was primarily focused on the general community development needs of Montgomery County low to moderate income residents. During the public hearing on October 6, 2021, the Community Development Advisory Committee (CDAC) heard testimony from representatives of homelessness prevention and from those addressing health, housing, education, and senior needs of low-income residents. The information shared by industry experts was used to make decisions by the CDAC on Community Development Block Grant (CDBG) public services grants to serve low to moderate income Montgomery County residents.

During the hearing, attendees were also informed of the upcoming opportunity to receive \$7.3 million in HOME funds from the American Rescue Plan. Public hearing participants were also informed of the qualifying populations that may benefit from HOME-ARP funding.

This Public Hearing included participation from all 17 active members of the CDAC, the Department of Housing and Community Affairs staff and the Deputy Director, as well as testimony from 7 participants. The following groups provided testimony: the Division of Aging and Disability services from the Department of Health and Human Services (DHHS), the Division of Services to End and Prevent Homelessness from DHHS, Housing Unlimited, Inc., Montgomery Housing Partnership, Inc., Mobile Medical Care, Inc., The Shepherd's Table, Inc, and Collegiate Directions, Inc.

The second Public Hearing focused specifically on the HOME-ARP Allocation Plan. DHCA went into detail to explain the purpose of HOME-ARP, the amount awarded to Montgomery County (\$7,310,978), and the range of activities that could be undertaken. DHCA also discussed the beneficial use of these funds for the identified qualifying populations and shared the Allocation Plan progress and survey findings with the public (see Appendix). A total of 31 residents and community leaders registered to participate in the Public Hearing, and of these, four registered to provide testimony on the subject. During the Public Hearing, 20 registrants were in attendance, along with four Montgomery County DHCA staff members. Testimony was presented by representatives of the Montgomery County Coalition for the Homeless (MCCH), Montgomery County's DHHS, and two formerly unhoused County residents. After this testimony, the public was given an opportunity to provide initial feedback on the information provided, as well as space to ask questions about how the plan would affect them or the people they serve.

The testimony from the DHHS Division of Services to End and Prevent Homelessness regarding the homeless situation in the County offered that the most significant gap was in the area of extremely affordable housing (at or below 30% AMI). In addition, MCCH, the largest nonprofit in the County exclusively dedicated to addressing the needs of the homeless population, also discussed the need for extremely affordable housing as well as permanent supportive housing to prevent homelessness. Both of the residents who spoke noted the importance of support for those coming out of homelessness including very affordable rents, financial support, and mental health assistance.

Describe any efforts to broaden public participation:

To broaden public participation, the Public Hearing was advertised on various platforms reaching different groups of residents, organizations, and community leaders. The Public Hearing notice was posted on DHCA's Twitter and Facebook accounts, as well as on the DHCA website, its announcements page and public event calendar. Advertisement was also published in the Washington Times newspaper. A mass personalized virtual invitation was sent out to 107 individuals representing 58 different groups who were then requested to pass along the Public Hearing information to members of qualifying populations and other interested groups.

Addressees included those who had earlier responded to the HOME ARP survey. The County's five Regional Service Centers included the invitation to the Public Hearing in their email blasts. The outreach disseminated to the public also encouraged them to provide public comments during the public hearing. Finally, two post hearing surveys were distributed to hearing participants and registrants.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

The Public Hearing participants did not have any specific recommendations on the use of the funding. However, they did pose questions regarding how Montgomery County plans to address homelessness. The questions centered on the County's approach to the idea of "housing first" and on ideas for solving the homelessness problem and for stabilizing individuals facing homelessness. Participants asked how many permanent supportive housing units are needed to assist chronic homelessness and to rapidly house families and individuals experiencing eviction or other reasons for the loss of their housing.

In response to the public's questions, the panel explained the need for more specialized permanent supportive housing while our population ages, in conjunction with having more complex medical and behavioral health issues. Therefore, funding the development of extremely affordable rental housing is a high priority, especially for those on a fixed income. Creating more mental health support systems for the homeless, and more shared co-housing spaces, would assist in the overall provision of services to benefit people in obtaining and maintaining their housing. Developing extremely affordable rental housing would also assist individuals and/or families who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, stalking, dating violence, sexual assault, or human trafficking.

In addition to the open discussion held with the attendees, following the presentation and testimonies, two post hearing surveys were distributed – one to participants and one to those registered to attend the hearing. The first post hearing survey received five responses and the second one received 13 responses. The survey asked, "*Which of the eligible activities should be the top priority for Montgomery County to spend its \$7.3 million HOME-ARP funds?*" Sixty-one percent (61%) said the County should acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by households of individuals and families that meet the definition of one or more of the qualifying populations. Thirty-one percent (31%) wanted to see additional supportive services for QPs.

Which of the eligible activities should be the top priority for Montgomery County to spend its \$7.3 million HOME-ARP funds?

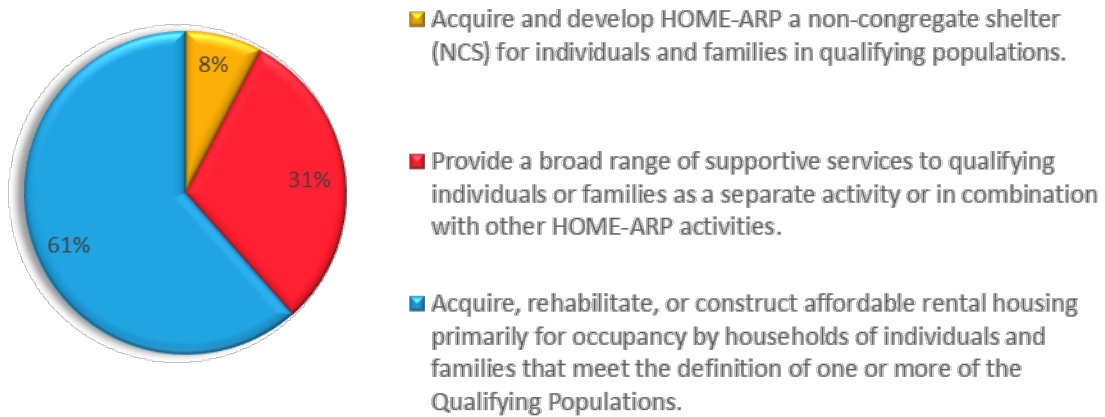


Table 3: Post Hearing Survey

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

The public participants did not pose any formal recommendations or comments. Responses to the surveys and testimonies, however, were all accounted for in the development of the Allocation Plan.

NEEDS ASSESSMENT AND GAPS ANALYSIS

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

To assess the unmet needs of the HOME-ARP qualifying populations, DHCA consulted with the Department of Health and Human Services (DHHS), as well as the Montgomery County Continuum of Care (CoC) members and the cities of Rockville and Takoma Park. Both the County's Public Housing Authority (the Housing Opportunities Commission or HOC) and Rockville's Public Housing Authority (Rockville Housing Enterprises or RHE) provided input in developing this Plan. The bulk of the data referenced here comes from the 2021 Montgomery

County Point-in-Time Homeless Count, the HUD 2021 Housing Inventory Count Report, and the Interagency Commission on Homelessness Annual Report 2021.

Those classified as homeless, at risk of becoming homeless, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other populations for whom supportive services or assistance would prevent homelessness are eligible for HOME-ARP assistance.

As outlined in 24 CFR 91.5, homelessness is defined as an individual or family who lacks or will imminently lose a fixed, regular, and adequate nighttime residence. Persons at risk of homelessness include an individual or family who has an income below 30% of area median income and who does not have sufficient resources or support networks to prevent them from moving to an emergency shelter. Also included in at risk of homelessness are those who face other housing instability factors such as frequent moving because of economic hardship and those who live in another's home, in a hotel or motel, or in an overcrowded environment because of economic circumstances as well as those who are exiting a publicly funded institution or system of care.

Also eligible to benefit from HOME ARP funds are persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking in situations where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against them at their primary nighttime residence.

Other populations that are included for HOME ARP and are not defined above, encompass those who may previously been qualified as "homeless" and are currently housed due to temporary or emergency assistance but will need additional housing assistance or supportive services to avoid a return to homelessness. Households that have an income less than or equal to 50% of median family income for their area can be considered if they also face other housing instability such as frequent moving because of economic hardship. Those who live in another's home due to economic reasons, in a hotel or motel or in an overcrowded environment as well as those who are exiting a publicly funded institution or system of care may also be considered under "other populations."

Veterans and their families who meet any of the above criteria are eligible for HOME ARP assistance.

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

According to the 2021 Annual Point-in-Time count conducted on January 27, 2021, Montgomery County continues to see an average 5% downward trend in the number of homeless persons counted, from a peak, of 1,100 in 2015 to a low of 577 in 2021 in spite of the COVID pandemic.

The majority of the 577 homeless individuals counted in 2021 were single adults in shelter (68%). Unsheltered single adults comprised 12% while families and youth made up the remaining 20%.

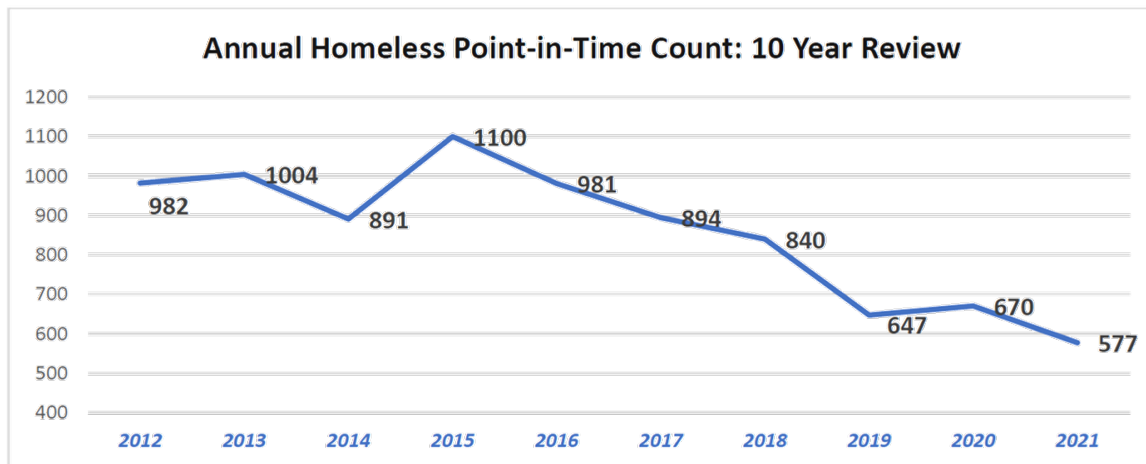


Table 4: 2021 PIT Montgomery County

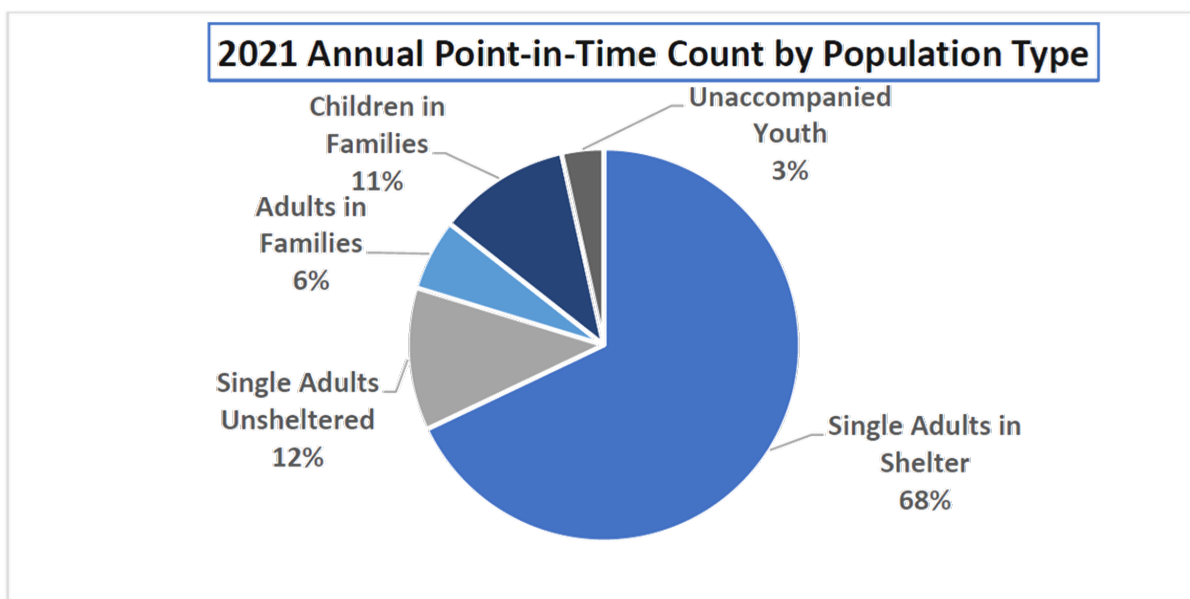


Table 5: 2021 PIT Montgomery County

According to the County's 2020 SAGE Report, of the 527 individuals served through Emergency Shelter and Rapid Re-Housing that year, 69% identified as Black or African American, 16% identified as Hispanic or Latino, and three individuals identified as veterans. According to the

U.S. Census Bureau QuickFacts as of July 2021, 20% of Montgomery County residents identify as African American, 20% identity as Hispanic, and 38,853 (4%) identified as veterans.

These statistics indicate that Black or African American residents are disproportionately represented among those experiencing homelessness by a wide margin, especially among households with minor children where they comprised 84% of the total. In households without children, males comprised 64% of the population, while in households with children, females comprised 62%.

Of the 527 individuals served, 80 (15%) reported having a history of domestic violence and 3 (.5%) stated they were fleeing domestic violence. Those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking are comprised of all races and ethnicities. The Jewish Coalition Against Domestic Abuse (JCADA) reports that, “Our clients are all suffering from financial abuse and lack of home ownership, usually do not have their name on a lease or mortgage and are either not allowed to work or have all their funds controlled by their abusive spouse.” This situation presents unique challenges including the importance of finding confidential housing opportunities.

Montgomery County’s Family Justice Center promotes safety, wellness, and healing for victims of intimate partner domestic violence. During 2021 they served 1,726 survivors, surpassing all their prior years of service. Most of the clients served were female and Hispanic/Latino; 93% were female and 34% were Hispanic/Latino with a close 31% of Black/African American survivors. Almost 35%, the majority, of the victims served were between 26 and 35 years of age. With a diverse clientele, they were able to provide their services in 26 different languages ranging from Albanian to Vietnamese, among others. The Center supported their clients through Ride to Safety Program safe rides, emergency gift card assistance for basic necessities, and connections to the Safe Start counseling program for children.

Q12a: Race

	Total
White	109
Black or African American	365
Asian	19
American Indian or Alaska Native	0
Native Hawaiian or Other Pacific Islander	1
Multiple Races	28
Client Doesn't Know/Client Refused	5
Data Not Collected	0
Total	527

Q12b: Ethnicity

	Total
Non-Hispanic/Non-Latino	444
Hispanic/Latino	83
Client Doesn't Know/Client Refused	0
Data Not Collected	0
Total	527

Q14a: Domestic Violence History

	Total
Yes	80
No	148
Client Doesn't Know/Client Refused	0
Data Not Collected	0
Total	228

Q14b: Persons Fleeing Domestic Violence

	Total
Yes	3
No	65
Client Doesn't Know/Client Refused	1
Data Not Collected	11
Total	80

Table 6: FY2020 SAGE Report

1,726
Clients Served

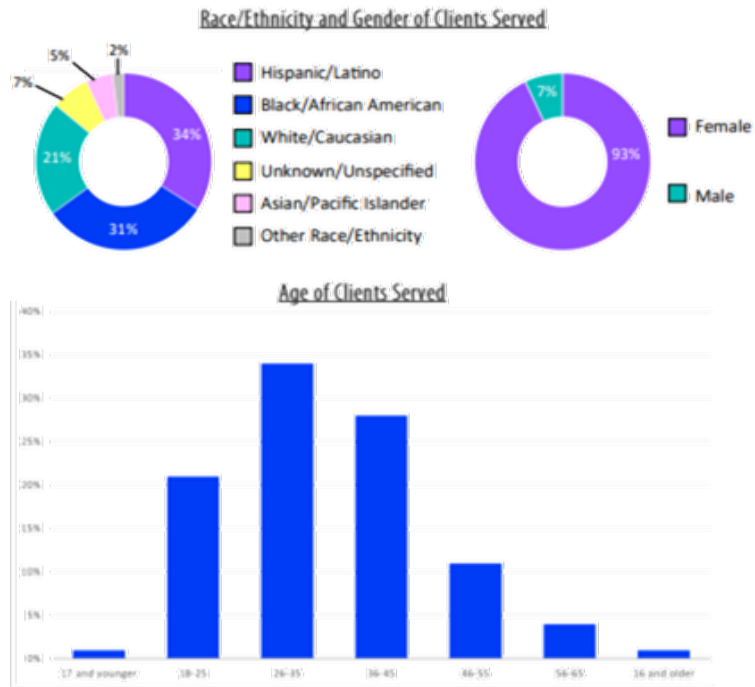


Table 7: Family Justice Center FY2021 Snapshot

Based on the subpopulation data breakdown in the 2021 PIT count below, the chronically homeless and limited English adults only household numbers increased in 2021 by over 400%. The pandemic contributed to decreased access to mainstream services, such as behavioral health and medical care leading to increased housing challenges. The shift of the CoC service delivery to more culturally appropriate approaches, and amplified language access also created a safe environment for limited English households to discuss their housing needs. For example, most the domestic violence cases were reported by limited English households.

The 2014-2018 Comprehensive Housing Affordability Strategy data for Montgomery County shows that out of 127,965 renters, 26,945 (21%) were households at or below 30% AMI, who are, by definition, at risk of homelessness.

	Adults Only in all Households 2020	Adults Only in all Households 2021	Percent Change 2020-2021
Chronic Substance Abuse (CSA)	71	33	-53%
Severe Mental Illness (SMI)	123	156	+27%
Dual Diagnosis (CSA&SMI)	0	61	x
Chronic Health Problem	26	77	+196%
Living with HIV/AIDS	15	5	-67%
Physical Disability	61	118	+93%
Domestic Violence Victim History	35	82	+134%
Limited English	11	60	+445%
U.S. Veterans	12	18	+50%
Chronically Homeless	10	51	+410%

Table 8: 2021 PIT Montgomery County*

**Montgomery County saw increases in every subpopulation with two exceptions, those living with HIV/AIDS and those reporting chronic substance use. The greatest increases were with chronically homeless adults and adults with limited English, 410% and 445% respectively. COVID-19 has led to decreased access to mainstream services including behavioral health and medical care. These barriers to support services likely attributed to the rise of people reporting significant challenges. Increases in people reporting a history of domestic violence and those with limited English proficiency may be explained by the CoC's efforts to provide more cultural appropriate services and break down barriers including language access. (Montgomery County 2021 PIT)*

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- **Sheltered and unsheltered homeless populations;**
- **Those currently housed populations at risk of homelessness;**
- **Other families requiring services or housing assistance or to prevent homelessness;**
- **Those at greatest risk of housing instability or in unstable housing situations:**

Agencies and organizations that serve the qualifying populations in Montgomery County overwhelmingly report that lack of available very low-income housing options is the most significant unmet housing need. Several emphasized the importance of diversion and prevention of homelessness through financial assistance or securing an extremely affordable unit before an individual loses their housing. Such intervention is likely to be more cost-effective than shelter beds in the long run as well.

By far the greatest unmet services need that respondents reported centered around mental health. For those living with severe and persistent mental illness it is difficult to find appropriate housing that is both very low-income and provides necessary care.

Employment services and childcare services also ranked as important unmet needs. Lack of employment opportunities or access to jobs prevents individuals from emerging from homelessness as does lack of childcare options that are affordable and available.

In addition, accessible housing for persons with disabilities is limited. This unmet need applies to overall available housing at any income level.

Based on the information collected and reviewed during the completion of the 2021 Annual Report by the Interagency Commission on Homelessness (ICH), the unmet housing and service needs identified were either a result of the pandemic or worsened by the pandemic. The report identified the following unmet needs: insufficient care coordination with other systems of care, dearth of affordable housing for extremely low-income homeless individuals and families, lack of adequate rapid re-housing units, and lack of access to employment services and job opportunities.

Extremely affordable housing opportunities would allow those who are employed at very low wage jobs or on fixed incomes to avoid having to stay in a shelter bed by rapidly exiting homelessness into permanent housing, including supportive services, if necessary.

Unfortunately, there continue to be many older adults entering the homeless system. Fifty-six percent of the adults without children entering the homeless system are over 45 years old. The PIT count projects that people experiencing homelessness die on average 30 years earlier than the average person. If an older adult has a history of homelessness at 45 or older, they are already likely experiencing the health challenges of someone in their 70s.

Affordable housing is particularly scarce for low-income senior residents who suffer from serious mental illness. Typically, nursing homes are unable to manage their mental health care.

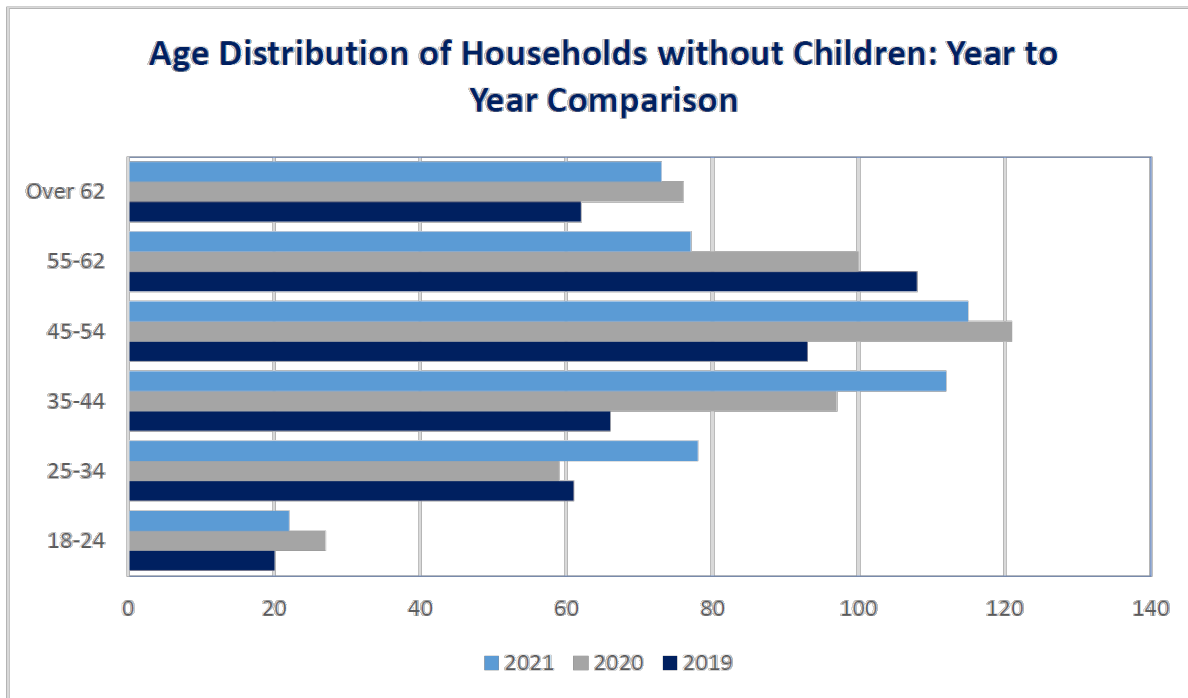


Table 9: 2021 PIT Montgomery County

Over the previous two years, the number of reported domestic violence cases decreased by 21%. However, as of 2021, the number of reported cases jumped upwards by 134%. In 2020, the number of such cases reported in the County was 35, but in 2021 it increased to 82 cases. As for the percent of adults actively fleeing domestic violence, the amount decreased by 8% between 2020 and 2021.

After consultation with the Montgomery County Coalition for the Homeless, homeless community advocates and service providers state the following are needed to improve the service delivery system: more crisis response teams, more mobile crisis teams, more crisis mental health workers working within Permanent Supportive Housing and shelters, and more peer specialists to help in curbing the overdose crisis. Additional affordable housing is always needed and is a challenge to find, especially for those needing supportive services.

As of December 2015, Montgomery County achieved the goal of ending Veteran Homelessness. However, in 2021, 18 homeless veterans were counted. For the CoC to maintain this accomplishment, each year the count should remain at 6 or fewer Veterans experiencing homelessness each year. As of April 2021, 9 Veterans, 50% increase, identified as homeless, but were already awaiting housing placement.

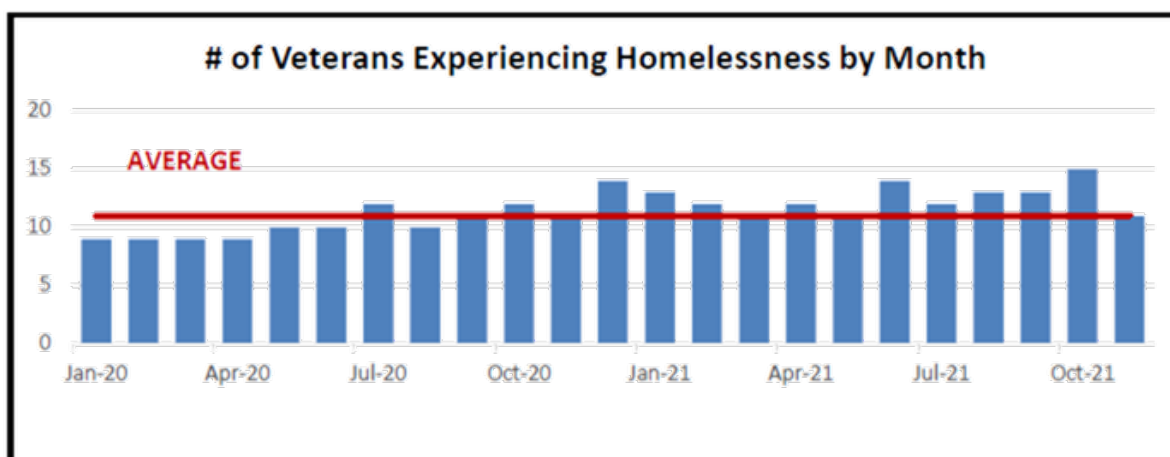


Table 10: Interagency Commission on Homelessness 2021 Annual Report

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:

The County continually strives to increase the capacity of permanent supportive housing and Rapid Rehousing units with the goal of reducing or eliminating homelessness overall. All measures are put in the context of making homelessness a rare, brief, and one-time only experience. Montgomery County has 742 available shelter beds for households with and without children, and the 2021 PIT count measured 577 homeless individuals in Montgomery County.

MONTGOMERY COUNTY'S YEAR-ROUND AND WINTER INVENTORY OF BEDS				
	Beds for Households w/o Children	Beds/Units for Households w/children	Total Year-Round Beds as of April 2020	Total Beds
COVID19 Social Distancing Expansion of shelters (hotels & Recreation Centers)	406	51/17	457	457
Emergency Shelter Beds	74	126/43	196	196
Transitional / Safe Haven Beds	53	36/7	89	89
TOTALS	553	213/67	742	742

Table 11: 2021 PIT Montgomery County

From 2017 to 2021, the number of units of permanent supportive housing in Montgomery County increased by 23% from 2,311 to 2,848. Most significantly, the supply of rapid rehousing beds has increased 138% and permanent supportive housing beds has gone up by 16%. The CoC adopted the goal of increasing rapid housing by 350 units as a result of the 2017 Gap Analysis.

Due to the increase in funding from the Emergency Solutions Grant- CV, the CoC was able to increase the number of rapid rehousing units in 2020-21 by 300 units, although it should be noted this funding is temporary. The CoC also increased the number of permanent supportive housing units by 34 this year.

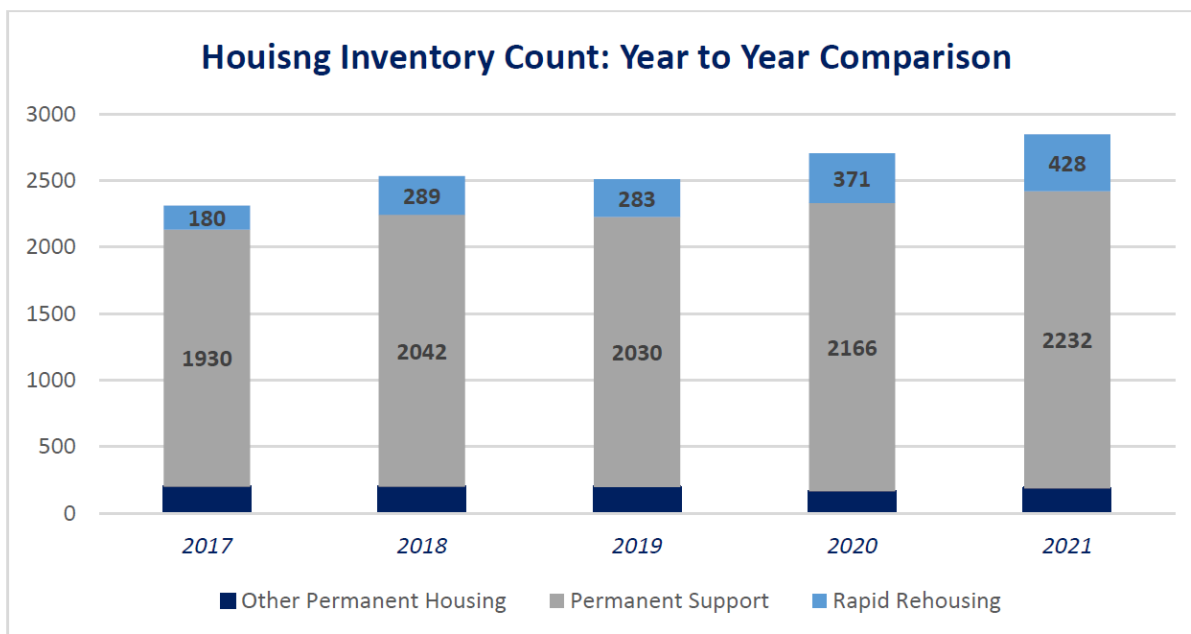


Table 12: Interagency Commission on Homelessness 2021 Annual Report

Since 2018, Montgomery County has participated in the state of Maryland’s Department of Health Assistance in Community Integration Services (ACIS) pilot that uses the 1115 Medicaid Waiver to pay for supportive services. This year, the CoC added 20 additional ACIS slots for individuals with significant behavioral health challenges. Another 14 units of intensive permanent supportive housing were added to the housing capacity. This program is designed to serve unsheltered individuals with a history of poor engagement with services by master leasing units.

County officials remain committed to investing new local resources for permanent supportive housing, rapid rehousing, and shallow subsidies. As stated earlier, the CoC seeks to provide access to housing to all people experiencing homelessness. This requires creativity and an ability to leverage federal and state resources. The Rental Assistance Program (RAP). RAP provides a permanent shallow subsidy for older adults or people with disabilities exiting homelessness or at imminent risk of losing their home. This year the County Council approved changes to the program that increase the subsidy amount from \$200 to \$400 per month. RAP is currently used to sustain people who meet the RAP eligibility criteria when their rapid rehousing subsidy ends.

Recognizing the limitations of the PIT Count, the CoC also measures success by monitoring overall system performance. All measures are put in the context of making homelessness a rare, brief, and one-time only experience. Data is collected and reported to HUD annually based on the federal fiscal year. Despite the impact of the pandemic, the CoC has largely maintained the gains made over the past few years and has improved in reducing the number of households experiencing homelessness for the first time

The CoC continues to prioritize limited scattered site transitional housing for households that identify themselves as victims of domestic violence, as fleeing domestic violence with minor children, or as having undocumented status so that they may be connected quickly to transitional housing.

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

The Montgomery County CoC has developed a diverse range of services to end and prevent homelessness in the County, yet gaps remain, according to the ICH 2021 Annual Report.

During the pandemic, many of the households served in permanent housing had difficulty accessing their regular community-based healthcare services since many systems of care shifted to telehealth. These households often did not have the technology or know-how to be successful through the internet.

An overall lack of housing available to extremely low-income households in the County remains a major difficulty. This leads to a high risk of homelessness among those making less than 30% AMI and includes those residents living on a fixed income such as social security.

Another gap identified is the lack of adequate Rapid Re-Housing units. Based on the information provided by the CoC, there is a need for an additional 200 Rapid Re-Housing units. This gap is temporarily being addressed using Emergency Solutions Grant-CV funding until funds end in 2022.

As a result of the pandemic, the County's unemployment rates have increased. Qualifying populations need more workforce development, especially for households with children.

Based on the information analyzed in the Market at a Glance report generated by HUD, the average rent in the County increased by 7%, to \$1,892. Between 2021 - 2022, approximately 2,625 multifamily units were permitted, a 33% increase compared to the number of units permitted during the same period a year earlier. As of the most recent MAAG, 3,100 rental units are expected to be completed within the next 3 years almost fully satisfying the projected market demand of 3,850 units.

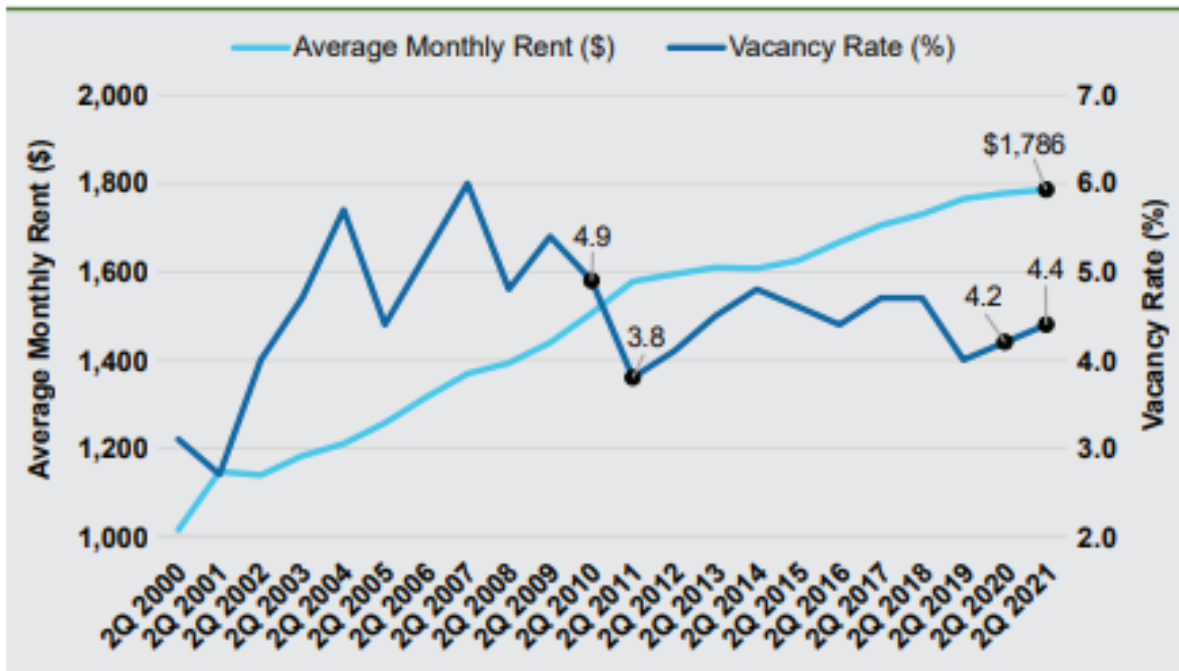


Table 13: Apartment Rents and Vacancy Rates - RealPage, Inc.

The 2014-2018 Comprehensive Housing Affordability Strategy data for Montgomery County shows that out of 127,965 renters, 26,945 (21%) were households at or below 30% AMI, who are, by definition, at risk of homelessness. Of the households outlined in the CHAS, 66,570 (52%) identified as being housing cost burdened, meaning that more than half of renters in the County had monthly housing costs (including utilities) exceeding 30% of their monthly income. Of the renter households at or below 30% AMI, 17% had a housing cost burden exceeding 30% of their monthly income and 15% had a housing cost burden exceeding 50% of their monthly income.

In addition, the CHAS showed that over 50% of renters in the County had at least one Housing Problem, and 30% had at least one Severe Housing Problem. Since factors such as incomplete kitchen or plumbing facilities are rare in the County, that leaves overcrowding (more than one person per room) and housing cost burden as the drivers of these problems. If the cost burden indicates that more than 30% of income is spent on rent, it is considered a Housing Problem while more that 50% of income going for housing is considered a Severe Housing Problem.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

One major indicator of housing instability and increased risk of homelessness is the number of housing cost burdened households. As outlined in the 2014-2018 CHAS, 52% of renters found themselves cost burdened. The FY22 Income Limits Summary from HUD indicates that the average maximum rent for households at 30% AMI should not exceed \$1,094.25 while the average rent in the County is \$1,892, an almost \$800 difference.

The ICH developed a Homeless Prevention Index to predict households most at risk of entering the homeless continuum. Through this tool, they recognized that people of color are disproportionately impacted by homelessness and evictions. Characteristics that put someone at risk of losing their housing come in three main categories: 1) social determinants such as poverty, being a person of color, or being a single parent; 2) housing stress such as overcrowding, being a low-income renter, or there being a high turnover in below median rental units; and currently, 3) COVID impact such as illness or unemployment.

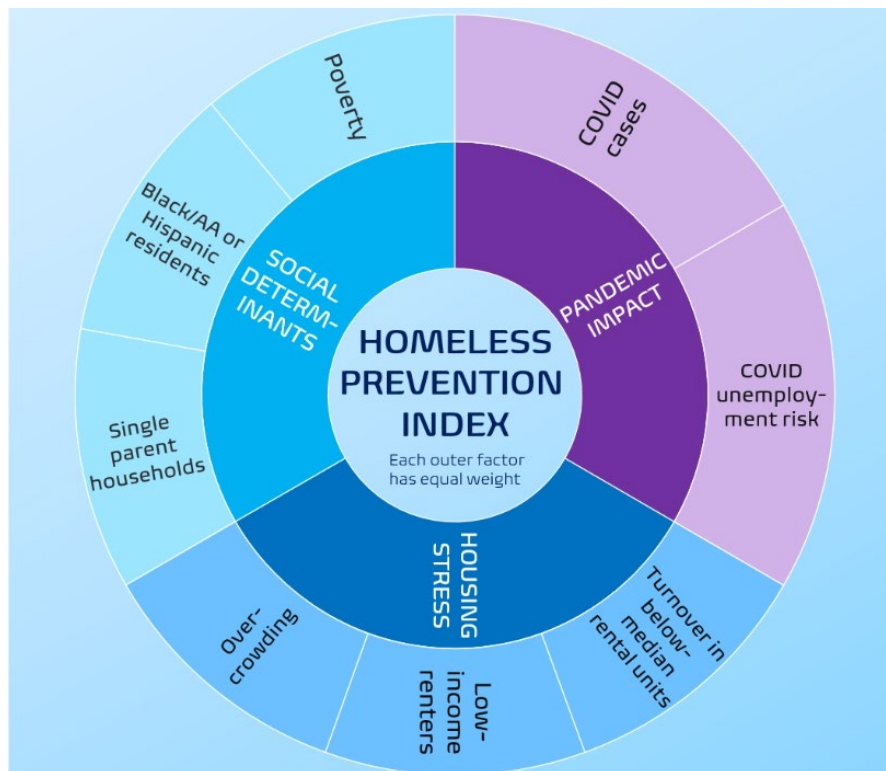


Table 14: 2020 Homeless Prevention Index

The temporary security of the eviction moratorium during the COVID pandemic has ended. The 2021 Interagency Commission on Homelessness Annual Report states that the first step in preventing eviction is offering housing counseling services and landlord mediation, which are currently available through DHCA.

Identify priority needs for qualifying populations:

Montgomery County's HOME ARP survey results clearly indicated that respondents' top priority for addressing the housing gap for all of the qualifying populations was extremely affordable housing. Their second priority was rental assistance, which would serve the same objective to make permanent housing a possibility for the targeted residents. Third in the survey's priority ranking is additional permanent supportive housing.

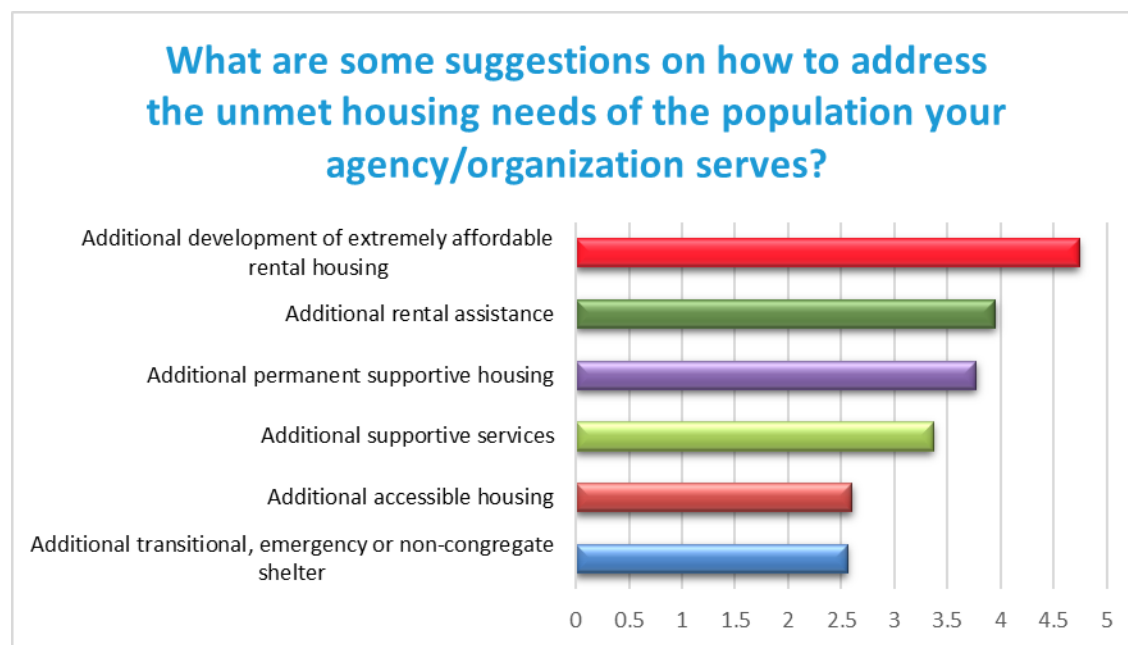


Table 15: HOME-ARP Consultation Survey

In 2020, the ICH launched a Strategic Plan to End Homelessness. The Plan includes six strategies: Reduce Racial Disparities Across the System, Build and Support Strong and Adaptable Programs, Build and Support Affordable Housing Solutions within the Homeless Continuum, Coordinate Effectively Across Other Systems of Care, Increase and Diversify Funding, and Education and Advocacy for Change.

In order to end homelessness within a ten-year timeframe, the ICH recommends increasing the housing supply by funding the development of deeply affordable housing to extremely-low income families. Extremely low-income families are defined as households below 30% of the area median income. This recommendation will help address the affordable housing supply gap as identified by the survey respondents and the data in the PIT and ICH reports.

Another recommendation from the ICH is the use of funding to purchase a hotel portfolio to re-imagine as extremely affordable micro-units. According to the ICH report, many individuals experiencing homelessness have regular income but are unable to find housing that is affordable to them. The ICH believes that by providing micro units at an extremely affordable

rate, these individuals will be able to self-resolve and end their experience with homelessness. The ICH envisions a facility with individual, furnished units with private bathrooms and limited kitchen facilities.

Montgomery County has already secured 742 available shelter and transitional beds for households with and without children, and it continually strives to increase the capacity of permanent supportive housing and Rapid Rehousing units with the goal of reducing or eliminating homelessness overall. Extremely affordable housing opportunities would allow those who are employed at very low wage jobs or on fixed incomes to avoid having to stay in a shelter bed by rapidly exiting homelessness into permanent housing, including supportive services, if necessary.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The level of need and gaps in the County's shelter, housing inventory, and service delivery systems were determined through the data and information found in the 2021 Point-in-Time Homeless Count and the Interagency Commission on Homelessness 2021 Annual Report. This information was supplemented by data collected through the surveys distributed amongst organizations and agencies serving and advocating for qualifying populations. The responses from service providers and representatives of the qualifying populations echoed the gaps identified in the Point-in-Time Homeless Count and the Interagency Commission on Homelessness 2021 Annual Report, namely that the top priority at this time is to provide additional deeply affordable rental units to households who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness.

HOME-ARP ACTIVITIES

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

Given the urgent need for deeply affordable housing described above and emphasized by the two Public Housing Authorities HOC and RHE, Montgomery County would like to apply HOME ARP funds to provide extremely affordable efficiency-style housing units to individuals experiencing homelessness who have regular income but are earning at or below 30% AMI. To accomplish this, the County may either purchase an existing building or build a new one if a suitable existing property is unavailable. Under the first scenario, the County would apply all or a part of the funds toward an acquisition. Any remaining funds would be used for renovations.

The County would likely engage both an architect and general contractor it already has under contract to renovate an acquired property. In the event a suitable property is not available for acquisition, the County would apply funds toward the purchase of land for a new building. It would then issue a solicitation for a design-build firm to design and construct a new housing development for the County, for which it would use the balance of the funding. Under either scenario, the County's Department of Health and Human Services would procure a property management company to lease and operate the property for the County.

To procure design and construction services, the County's Department of General Services (DGS) would issue a Request for Proposals (RFP). Written proposals would be reviewed and scored by a Qualified Selection Committee (QSC) based on qualification criteria outlined in the RFP and the top scorers would be interviewed by the QSC. After the interviews and with permission from the County's Office of Procurement, DGS would negotiate any changes to price, scope or contract terms with the top scorer, then recommend that the Office of Procurement award the contract. Once the contract is signed and a purchase order issued, the County would issue a notice to proceed to the consultant.

In the event Montgomery County were to use an existing design contract that would have been procured as described above, the architect would be required to submit a proposal for a task order under the existing contract. If we were to use an existing construction contract for general contractors that have been prequalified per the procurement process described above, the contractors would also submit bids on the work. The lowest bidder would be awarded the contract for the project.

If any portion of the PJ's HOME-ARP administrative funds were 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:

Not applicable.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	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	\$ 7,310,978		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 0	# %	15%
Total HOME ARP Allocation	\$ 7,310,978		

Additional narrative, if applicable:

It is anticipated that Montgomery County HOME-ARP funds would be used for acquisition and/or rehabilitation of extremely affordable housing units to serve as Affordable Living Quarters (ALQs) for individuals who are able to pay up to \$500/month (approximately 15% of AMI) with their regular income. These residents, because of their extremely low income, are included in the Qualifying Populations as experiencing homelessness or at risk of homelessness. Preferences would not be set, however, for any one Qualifying Population over another. The population served may be on a fixed income, i.e., receiving social security or disability benefits, or in low-wage jobs. Since the onset of the pandemic, there has been an increase of younger (between 30 and 45 years) low wage workers in the County. It is anticipated that occupants will sign year-long leases. The project would not be supportive housing; no intensive wraparound services would be included.

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:

Montgomery County has a significant housing gap for very low-income residents at 30% AMI or below. Such residents are at very high risk of becoming homeless or are already homeless. According to Montgomery County's Department of Housing and Community Affairs 2020 – 2021 Annual Report, more than 20,000 households are severely housing cost burdened and earn less than \$31,000 a year to cover more than half their income on rent. According to the United States Census Bureau over 64,000 Montgomery County households pay 30% or more of their monthly income on monthly housing costs and expenses.

Reducing severe housing cost burdens requires reducing housing costs and increasing the number of deeply affordable housing units; providing rental assistance and supporting homeownership; preserving current affordable housing units while enabling tenants to remain

in affordable housing in the event of redevelopment; and promoting wage growth and housing accessible to job training and education opportunities.

To reduce severe housing cost burdens, the County needs 20,000 more affordable units priced for people earning less than 50% AMI. Further, the Metropolitan Washington Council of Governments (COG) predicts a need for about 40,000 more housing units by 2030; Montgomery Planning predicts one-fourth of new households will need housing affordable up to 50% AMI.

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:

The ALQs could be part of a larger project offering rental housing to a range of household incomes. The goal would be to provide up to 100 ALQs. Though not a requirement, the preference would be for each ALQ to be accessed from the exterior as opposed from traditional enclosed hallways.

Individual units are envisioned to be around 250 to 300 square feet. Studio efficiencies or one-bedroom units would meet the needs of the project. All units will include a full private bathroom. A full in-unit kitchen is not necessary although kitchenettes with microwaves, refrigerators and sinks should be in each unit. However, if the project is a purchase of an existing building with a sink outside of a bathroom, i.e., the sink is outside of the bathroom as is the case with some hospitality assets, then a separate kitchen sink may not be necessary. All units would be furnished with basic bedroom and living area furniture.

While the project would not include supportive social services, amenities may include communal space for outside entities to provide residents with services such as financial advising or signing up for Medicaid, etc. Community space could be programmed by partner nonprofits to bring community-based services to the residents. A communal kitchen would be a benefit to the project but is not a necessity.

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

The ALQ project provides extremely affordable efficiency-style housing units to individuals experiencing homelessness who have regular income. Many individuals experiencing homelessness have regular income but are unable to find housing that is affordable to them. This translates into housing affordable to individuals earning below 30% of the area median income (AMI). By providing ALQs at this affordable rate, these individuals will be able to self-resolve and end their experience with homelessness. People of color are disproportionately impacted by homelessness. In the latest Homeless Point-in-Time Count, more than 60% of individuals identified as Black or African American. This project seeks to reduce the

racial disparities in homelessness and access to housing by providing low-barrier access to permanent and deeply affordable housing.

Funds in addition to the HOME-ARP grant would likely be needed for acquisition of property, as well as for any renovation.

There are many options for delivery. Some options include:

1. Purchase and convert an existing hotel/motel/long-term stay hospitality asset; or
2. Purchase and convert a commercial building such as a light industrial or office; or
3. Purchase and convert an existing residential building, such as a garden style or small multifamily building; or
4. New, ground up construction if existing product is not available in the marketplace.

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: Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). PJs are not required to describe specific projects to which the preferences will apply.

Preference will not be given to any qualifying population over another. The activities outlined in the allocation plan will not violate any fair housing, civil right, or nondiscrimination requirements, including those listed 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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Not applicable.

HOME-ARP REFINANCING GUIDELINES

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Not applicable.

Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not applicable.

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Not applicable.

Specify the required compliance period, whether it is the minimum 15 years or longer.

Not applicable.

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Not applicable.

Other requirements in the PJ's guidelines, if applicable:

Not applicable.

APPENDIX

1. HOME-ARP Agency and Service Provider Survey Questions and Response Summaries
2. Montgomery County Family Justice Center FY2021 Snapshot
3. HOME-ARP Public Hearing Presentation Slides: English & Spanish
4. Montgomery County's Department of Housing and Community Affairs Deputy Director
–Francis Demarais's HOME-ARP Public Hearing Remarks
5. HOME-ARP Post Public Hearing Survey Question and Responses
6. HOME-ARP Allocation Plan Draft Public Comment Period Announcement
7. Public Comments Summary
8. SF-424
9. Assurances
10. Certifications

HOME ARP - Needs Assessment and Gap Analysis

Q1. Please specify agency/organization type.

Answer Choices	Response Percent	Responses
Non-profit organization	67.44%	29
Government agency	25.58%	11
Other (please specify)	6.98%	3
	Answered	43
	Skipped	0

Q2. What is the name of your agency/organization?

Answered	43
Skipped	0

Q3. What population does your agency/organization serve (check all that apply)?

Answer Choices	Response Percent	Responses
Individuals and families experiencing homelessness	72.09%	31
Individuals and families at-risk of homelessness	69.77%	30
Veterans and families with a veteran family member	48.84%	21
Individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking	48.84%	21
Extremely Low Income (< 30% of area medium income)	76.74%	33
Persons with disabilities	79.07%	34
Populations for whom supportive services or assistance would prevent homelessness	69.77%	30
Other (please specify)	25.58%	11
	Answered	43
	Skipped	0

Q4. What is the primary ethnicity of the population your agency/organization serves?

<i>Answer Choices</i>	<i>Response Percent</i>	<i>Responses</i>
Hispanic/Latino	9.30%	4
Not Hispanic/Latino	11.63%	5
Both	79.07%	34
	Answered	43
	Skipped	0

Q5. What is the primary racial background of the population your agency/organization serves? Please rank from 1 to 6.

<i>Answer Choices</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6</i>	<i>Total</i>	<i>Score</i>
Black or African American	24	15	1	0	0	3	43	5.26
White	16	17	7	1	2	0	43	5.02
American Indian or Alaska Native	0	4	0	7	20	12	43	2.16
Native Hawaiian or Other Pacific Islander	1	0	2	12	17	11	43	2.21
Asian	0	0	27	12	4	0	43	3.53
Other	2	7	6	11	0	17	43	2.81
							Answered	43
							Skipped	0

Q6. Does race or ethnicity play a role in housing instability in Montgomery County? If so, how?

Answered	43
Skipped	0

Q7. What is the age of the population your agency/organization serves? Please rank from 1 to 5.

<i>Answer Choices</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>Total</i>	<i>Score</i>
under 18 years	5	10	2	2	24	43	2.3
19 years - 30 years	6	7	14	13	3	43	3
31 years - 51 years	22	9	6	5	1	43	4.07
52 years - 61 years	2	14	10	12	5	43	2.91
over 62 years	8	3	11	11	10	43	2.72
						Answered	43
						Skipped	0

Q8. What are the unmet housing needs of the population your agency/organization serves (check all that apply)?

<i>Answer Choices</i>	<i>Response Percent</i>	<i>Responses</i>
Extremely affordable rental housing	88.37%	38
Supportive services to prevent homelessness	67.44%	29
Accessible units/disability services	48.84%	21
Non-congregate shelter beds	30.23%	13
Other (please specify)	20.93%	9
	Answered	43
	Skipped	0

Q9. What factors contribute to the housing gap in Montgomery County (check all that apply)?

<i>Answer Choices</i>	<i>Response Percent</i>	<i>Responses</i>
Lack of affordable housing	93.02%	40
Lack of available housing	55.81%	24
Unemployment/Under employment	76.74%	33
Discrimination	60.47%	26
Lack of supportive services	58.14%	25
Lack of accessible units	48.84%	21
Lack of available adequate shelter beds	27.91%	12
Other (please specify)	18.60%	8
	Answered	43
	Skipped	0

Q10. How many people does your agency/organization serve on an annual basis?

<i>Answer Choices</i>	<i>Response Percent</i>	<i>Responses</i>
1 - 500	11.63%	5
501 - 1,000	16.28%	7
1,001 - 1,500	6.98%	3
1,501 - 2,000	4.65%	2
2,001 - 5,000	27.91%	12
5,000 - 10,000	11.63%	5
over 10,000	20.93%	9
	Answered	43
	Skipped	0

Q11. Approximately what percentage of the population that your agency/organization serves, are considered in financial need (please choose one)?

<i>Answer Choices</i>	<i>Response Percent</i>	<i>Responses</i>
Less than 25%	6.98%	3
Between 26-50%	16.28%	7
Between 51-75%	16.28%	7
More than 75%	60.47%	26
	Answered	43
	Skipped	0

Q12. What are some suggestions on how to address the unmet housing needs of the population your agency/organization serves? Please rank from 1 to 6.

<i>Answer Choices</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6</i>	<i>Total</i>	<i>Score</i>
Additional transitional, emergency or non-congregate shelter	6	2	4	3	11	17	43	2.56
Additional permanent supportive housing	10	4	11	7	6	5	43	3.77
Additional development of extremely affordable rental housing	19	8	6	6	4	0	43	4.74
Additional supportive services	1	6	12	15	7	2	43	3.37
Additional accessible housing	3	4	4	6	14	12	43	2.6
Additional rental assistance	4	19	6	6	1	7	43	3.95
	44%						Answered	43
	23%						Skipped	0

Q13. Please provide any additional suggestions or comments.

Answered	19
Skipped	24

FY 2021 Snapshot

Page 1



Thomas Manion, Director
Montgomery County
Family Justice Center

This year has been one of transition, to say the least. One that has required adaptability, patience, leaps of faith and thinking outside the box. I'm happy to report that our incredible team here at the Family Justice Center (FJC) met these challenges head on and have continued to exceed expectations. While our work with

allied agencies like the State's Attorney's Office, Police Department, Catholic Charities, Career Catchers and others relies more on technology than before, the same spirit of synergy and service continue to drive our work. Over the last year, we've embraced our "new normal" of Zoom and Teams meetings and face coverings, while still maintaining the collaborative aspects of

the FJC model that make it so successful. While other service centers and organizations shut down and/or reduced operations this year, we served 1,726 survivors, more than ever in our history. The adaptability and positivity I've seen from all of our allied agencies and teams has been truly inspiring.

The COVID-19 public health crisis created a perfect storm of horror for individuals living in fear due to abuse. The medical, occupational, emotional and financial stressors resulting from the pandemic put victims in significantly more danger than they were already in, at a time when they were simultaneously cut off from many of their usual support systems like friends, family, and hobbies. Through the efforts of our team of providers here at the Center, and through the guidance from our County leaders, we have remained fully open and operational and ensure help was availa-

ble to all who have needed it. It is a pleasure to lead this incredible group of professionals, and I look forward to what the future brings for our Center and for our community.

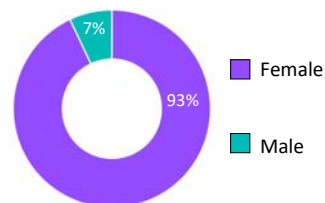
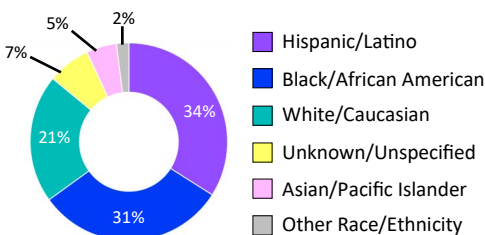
Stay safe,
Tom



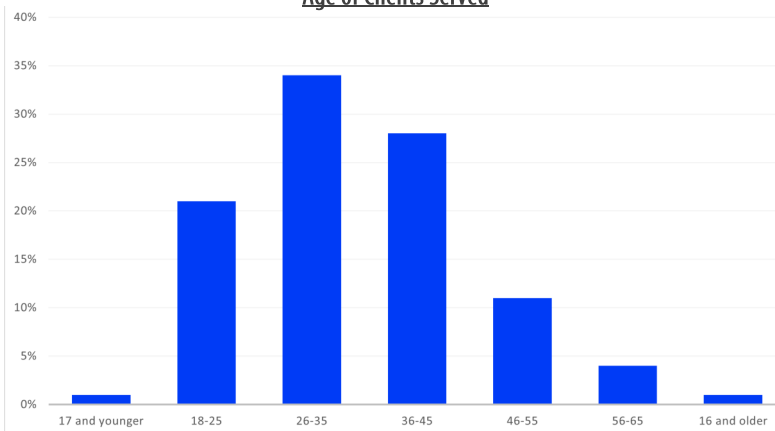
1,726

Clients Served

Race/Ethnicity and Gender of Clients Served



Age of Clients Served



The Montgomery County Family Justice Center believes in breaking down barriers so that services are available to all who need them. In a County as diverse as ours, language accessibility is critical. We would like to extend a huge thank you to all our multi-lingual staff and to VOIANCE, our language line interpretation service, for enabling us to provide services in 26 languages this year!

Albanian
 Amharic
 American Sign Language
 Bengali
 Bicol
 Chinese (Mandarin)
 Farsi

French
 German
 Haitian Creole
 Hindi
 Igbo
 Indonesian
 Japanese

Korean
 Latvian
 Nama
 Portuguese
 Russian
 Sinhala
 Spanish

Swahili
 Tagalog
 Telugu
 Urdu
 Vietnamese



FY 2021 Snapshot

Page 2

To those who donated to the FJC Foundation during the year: Thank you for your incredible generosity!

American Business Women's Association

American Sewing Guild - Rockville Pinups

Bar Association of Montgomery County
and its New Practitioners Section

Blu Water Day Spa

Cherry Children Christmas Toy Chest

Girl Scout Troop 32034 from Damascus

Hungerford's Tavern Chapter - Daughters
of the American Revolution



Imagination Library

Muslim Community Center

Scott Team International

Ss. Peter and Paul Antiochian Orthodox
Christian Church

Zeta Phi Beta Sorority Incorporated,
Gamma Alpha Eta Zeta Chapter

Zeta Phi Beta Sorority, Incorporated, Eta Pi
Zeta Chapter of Montgomery County

...and Countless Individual donations!



44

safe taxi rides provided through the
Ride to Safety Program



\$1,810

in emergency gift card assistance for groceries,
transportation and other basic needs

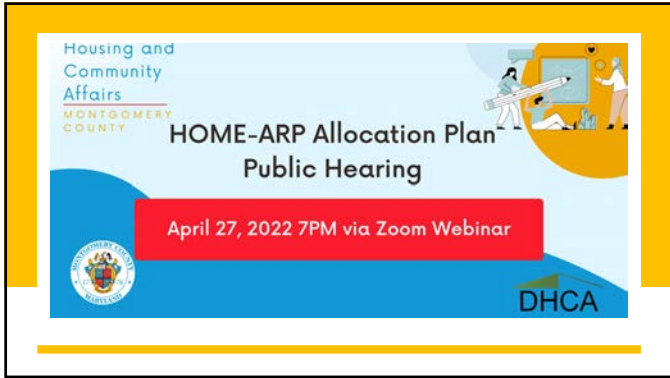


106

children referred to the Safe Start
counseling program



While the Family Justice Center itself never closed during the COVID-19 pandemic, our staff did temporarily operate on a hybrid on-site/telework schedule. We're happy to announce that as of June 7, 2021, all our staff are back on-site full-time. We continue to offer both in-person and virtual services for Clients, as well as enhanced cleaning and sanitizing procedures to protect both our employees and those we serve. Welcome back, Team!



1

Poblaciones que Califican

Individuos o familias que se encuentran sin hogar

Individuos o familias que están en riesgo de quedarse sin vivienda

Individuos o familias huyendo o intentando huir de la violencia doméstica, la violencia entre parejas, la agresión sexual, el acoso o tráfico humano

Individuos o familias a quienes brindar servicios de apoyo o asistencia evitaría la falta de vivienda

2

Actividades Elegibles

 Desarrollo y apoyo de viviendas asequibles

 Asistencia para inquilinos (TBRA)

 Servicios de apoyo

 Adquisición y desarrollo de unidades de alojamiento no congregado

3

Testimony by Frank Demarais on behalf of the
Montgomery County Department of Housing & Community Affairs

April 27, 2022

Good evening, I'm Frank Demarais, Deputy Director of the Department of Housing and Community Affairs.

Tonight, we are here to review with all of you new funding that Montgomery County has been allocated from the federal government to address urgent unmet housing needs in the County. We also want to gather your input on the topic to better inform our plan going forward.

The American Rescue Plan was signed into law by President Biden on March 11, 2021, to provide \$1.9 trillion in relief to address the continue impact of the COVID-19 pandemic on the economy, public health, state and local government, individuals, and businesses. From that, \$5 billion has been appropriated by Congress for homelessness assistance and supportive services through the HOME program.

\$7.3 million from these HOME ARP funds have been set aside for Montgomery County. In order to access those funds, the County is preparing an Allocation Plan that will gather input from stakeholders and the public. The County is also analyzing available data on unmet housing needs for the targeted populations.

HOME ARP funds must benefit individuals and families in the following four Qualifying Populations:

- Individuals or families who are experiencing homelessness
- Individuals or families who are at risk of homelessness
- Individuals or families who fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and
- Individuals or families where providing supportive services or assistance would prevent homelessness

There are four ways in which the County can use the HOME ARP funds to benefit these qualifying populations. They are through:

- Development and support of affordable housing
- Tenant-based rental assistance (TBRA)
- Provision of supportive services; and
- Acquisition and development of non-congregate shelter units

By reaching out to providers of services for the Qualifying Populations, DHCA has received feedback that the top priority in unmet housing needs in Montgomery County was “extremely affordable rental housing” with 80% indicating that they believed race and ethnicity have played a role in housing instability either through direct discrimination or from the effects of systemic and historic racism.

DHCA is also analyzing data to determine the size and demographic composition of the qualifying populations in the County and to identify gaps within the current shelter and housing inventory.

Next steps after today’s hearing are to draft the Allocation Plan for how the County intends to use its \$7.3 million to benefit the Qualifying Populations based on all the input and data received.

Our goal is to have a draft by the end of May. The draft will be available on the DHCA website for 15 days so that the public may submit comments. After this time period is over, we will submit the Plan to the US Department of Housing and Urban Development for review. Once the Plan has been accepted, the County may commit and use the funds.

SLIDES: QPs - 4 activities



Preview

Share

This form is read-only and can't be edited.

Questions

Responses 16

Which of the eligible activities below do you think should be the top priority for Montgom

16

Responses

04:15

Average time to complete

Active

Status

1. Which of the eligible activities below do you think should be the top priority for Montgomery County to spend its \$7.3 million HOME-ARP funds?

- Acquire, rehabilitate, or constr... 11
- Provide tenant-based rental as... 0
- Provide a broad range of supp... 4
- Acquire and develop HOME-A... 1



**MONTGOMERY COUNTY, MARYLAND
DEPARTMENT OF HOUSING AND
COMMUNITY AFFAIRS**

**NOTICE – Substantial Amendment 2 to FY 2021
Consolidated Plan Annual Action Plan: HOME-
ARP Allocation Plan**

In accordance with Title I of the Housing and Community Development Act of 1974 as amended and the regulations found at 24 CFR part 91, et. seq., the Department of Housing and Community Affairs (DHCA) has drafted Amendment 2 to Montgomery County's Consolidated Plan Annual Action Plan covering the period July 1, 2021 to June 30, 2022.

The Consolidated Plan Annual Action Plan describes projects proposed for funding in County Fiscal Year 2021 (7/1/2021- 6/30/2022) - with CDBG, HOME, and ESG funds. This Second Amendment is to add the HOME-ARP Allocation plan.

Montgomery County's Department of Housing and Community Affairs developed the HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) Allocation Plan. The HOME-ARP Allocation Plan draft is available for public review and outlines the use of \$7.3 million to address the housing needs of persons who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness.

All interested parties are invited to submit written comments on the allocation plan. The plan will be available on DHCA's website beginning August 29, 2022: **<http://www.montgomerycountymd.gov/DHCA/community/grants/conplan.html>**.

Written statements may be submitted via US mail or email until 4:00 PM, September 29, 2022 and should be addressed to:

**Aseem K. Nigam, Director
Department of Housing & Community Affairs
1401 Rockville Pike, Fourth Floor
Rockville, Maryland 20852
Aseem.Nigam@montgomerycountymd.gov**

Staff contact is Katherine Canales:
Katherine.Canales@montgomerycountymd.gov
(240) 777-3631
TTY number (for the hearing impaired) is 711

Announcements

HOME-ARP Allocation Plan Available for Public Review

Announcement Date: Monday, August 29, 2022

Montgomery County's Annual Action Plan, covering the County's fiscal year 2021 timeframe (July 1, 2020 - June 30, 2021), is being amended for a second time to add the HOME-ARP Allocation Plan. The HOME-ARP Allocation Plan draft outlines the use of \$7.3 million to address the housing needs of persons who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness.

All interested parties are invited to submit written comments on the Allocation Plan. The DRAFT Plan will be available for review online beginning August 29, 2022 here: <http://montgomerycountymd.gov/DHCA/community/grants/conplan.html>.

Statements may be submitted via US mail or email until 4:00 PM, September 29, 2022 and should be addressed to:

Aseem K. Nigam, Director
Department of Housing & Community Affairs
1401 Rockville Pike, Fourth Floor
Rockville, Maryland 20852
aseem.nigam@montgomerycountymd.gov

Staff contact is Katherine Canales, katherine.canales@montgomerycountymd.gov. Our TTY number (for the hearing impaired) is 711.

0

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Department of Housing and Community Affairs (DHCA)
@MCGMDDHCA



#HOMEARP

#EndHomelessness #AffordableHousing #Homeless

12:44 PM · Sep 1, 2022 · Twitter Web App



More Tweets



More Neighbours Toronto @MoreNeighbours · Sep 29



Who are the worst villains on city council when it comes to opposing housing? Read this dossier put together by one of our volunteers to find out! #toronto #housing #topoli



moreneighbours.ca

Three Toronto councillors hopelessly exacerbating ...
Jaye Robinson, Stephen Holyday, and Mike Colle
singled out as Toronto councillors most negatively ...

5

27

63



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Relevant people



Department of Housi...
@MCGMDDHCA

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What's happening

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Kraken at Canucks

Allure · Yesterday

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Los Angeles Times · Yesterday

What it's like to lose your sense of smell from COVID

Television · LIVE

Latest updates on Big Brother Naija Season 7

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Variety · 4 hours ago

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Montgomery County Event Calendar

HOME-ARP Allocation Plan Draft Available for Review

MONDAY, AUGUST 29, 2022

The HOME-ARP Allocation Plan draft outlines the use of \$7.3 million to address the housing needs of persons who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness.

Category Government
Age Adult
Area Bethesda/Chevy Chase, East County, MidCounty, Rockville, Silver Spring, Upcounty
Contact Name Katherine Canales
Contact Email katherine.canales@montgomerycountymd.gov
Link www2.montgomerycountymd.gov...

Events calendar powered by Trumba

Printed: Friday, September 30, 2022 at 1:57 PM PDT

Montgomery County Event Calendar

Due - HOME-ARP Allocation Plan Draft Available for Review THURSDAY, SEPTEMBER 29, 2022

The HOME-ARP Allocation Plan draft outlines the use of \$7.3 million to address the housing needs of persons who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and those for whom supportive services would prevent homelessness.

Category Government
Age Adult
Area Bethesda/Chevy Chase, East County, MidCounty, Rockville, Silver Spring, Upcounty
Contact Name Katherine Canales
Contact Email katherine.canales@montgomerycountymd.gov
Link www2.montgomerycountymd.gov...

Events calendar powered by Trumba

Printed: Friday, September 30, 2022 at 2:04 PM PDT

From: [Hawksford, Jacqueline "Jackie"](#)
To: [Canales, Katherine](#)
Subject: RE: Montgomery County Public Notice: HOME-ARP Allocation Plan
Date: Thursday, September 29, 2022 4:16:11 PM
Attachments: [image001.png](#)

No, I haven't seen any comments.

Jackie Hawksford
Senior Executive Administrative Aide to the Director of
The Department of Housing and Community Affairs
240-777-3605, cell: 240-597-6165

From: Canales, Katherine <Katherine.Canales@montgomerycountymd.gov>
Sent: Thursday, September 29, 2022 4:10 PM
To: Hawksford, Jacqueline "Jackie" <Jackie.Hawksford@montgomerycountymd.gov>
Subject: RE: Montgomery County Public Notice: HOME-ARP Allocation Plan

Good afternoon Jackie,

I was wondering if Aseem received any comments in reference to our HOME-ARP Allocation Plan. Thank you for keeping an eye out!

Best,
Katherine

From: Hawksford, Jacqueline "Jackie" <Jackie.Hawksford@montgomerycountymd.gov>
Sent: Friday, August 26, 2022 10:37 AM
To: Canales, Katherine <Katherine.Canales@montgomerycountymd.gov>
Subject: RE: Montgomery County Public Notice: HOME-ARP Allocation Plan

ok

Jackie Hawksford
Senior Executive Administrative Aide to the Director of
The Department of Housing and Community Affairs
240-777-3605, cell: 240-597-6165

From: Canales, Katherine <Katherine.Canales@montgomerycountymd.gov>
Sent: Friday, August 26, 2022 10:36 AM
To: Hawksford, Jacqueline "Jackie" <Jackie.Hawksford@montgomerycountymd.gov>
Subject: Montgomery County Public Notice: HOME-ARP Allocation Plan

Good morning Jackie,

The Washington Times will publish a Public Notice on Monday August 29th to encourage public comment on the HOME-ARP Allocation Plan and Amendment 2 to the FY21 Annual Action Plan. The notice states the

public has until September 29th to reach out via e-mail or USPS to submit comments to Aseem. I will check in around that date to confirm if anything has been received.

Best,



Katherine Canales, Senior Planning Specialist

Grants and Asset Management, DHCA

phone/fax (240) 777-3631/3699

email katherine.canales@montgomerycountymd.gov

web www.montgomerycountymd.gov/dhca

1401 Rockville Pike, 4th Floor • Rockville, MD 20852

For questions about services provided by [Montgomery County](http://www.montgomerycountymd.gov), or to file a complaint, please contact [MC311](http://www.montgomerycountymd.gov/mc311) at 3-1-1 or (240) 777-0311.



For more helpful Cybersecurity Resources, visit:

<https://www.montgomerycountymd.gov/cybersecurity>

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** Montgomery County, Maryland

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

52-6000098

*** c. UEI:**

NKUJZ83VKP51

d. Address:

*** Street1:** 1401 Rockville Pike, 4th Floor

Street2:

*** City:** Rockville

County/Parish:

*** State:** MD: Maryland

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 20852-1428

e. Organizational Unit:

Department Name:

Housing and Community Affairs

Division Name:

Finance

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Dr.

*** First Name:**

Pofen

Middle Name:

*** Last Name:**

Salem

Suffix:

Title: Chief, Division of Finance and Administration

Organizational Affiliation:

Montgomery County, Maryland

*** Telephone Number:** 240-777-3728

Fax Number:

*** Email:** Pofen.Salem@montgomerycountymd.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:

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME) American Rescue Plan (ARP)

* 12. Funding Opportunity Number:

14.239

* Title:

HOME Investment Partnerships Program (HOME) American Rescue Plan (ARP)

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:

Development of Affordable Rental Housing

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 * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="7,310,978.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="7,310,978.00"/>

*** 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)**

☒ ** 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: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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:

1. 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.
2. 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.
8. 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).
9. 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 non-discrimination. 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.

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.
12. 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.
13. 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.
14. 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).
16. 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.
17. 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.).
18. 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."
19. 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 Assistant Chief Administrative Officer
APPLICANT ORGANIZATION Montgomery County Government	DATE SUBMITTED 10/11/22

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:

1. 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.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. 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).
6. 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.
8. 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.

9. 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.
13. 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."
18. 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 Assistant Chief Administrative Officer
APPLICANT ORGANIZATION Montgomery County Government	DATE SUBMITTED 10/11/22

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.



Signature of Authorized Official

10/11/22

Date

Assistant Chief Administrative Officer
Title

CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

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 has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

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.



Signature of Authorized Official

10/11/22

Date

Assistant Chief Administrative Officer

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.