



**Substantial Amendment to the  
2021 Annual Action Plan HOME-ARP Allocation Plan**

**May 9, 2022**

**Polk County Housing and Neighborhood  
Development Office**



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## **Consultation**

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:***

Prior to developing the HOME ARP Plan, the Polk County Housing and Neighborhood Office consulted with the local Continuum of Care (CoC) this is the only CoC serving all of Polk County. The Allocation Plan was presented at the December 15, 2021, member meeting. The Homeless Coalition of Polk County (HCPC) is the lead agency for the Lakeland-Winter Haven Continuum of Care (CoC). Individuals and agencies representing homeless services providers, veterans' groups, public housing agencies, and agencies that assist with the disabled attended the consultation and input meeting. Another input meeting was held for citizen's, local PHA representatives, and developers of affordable housing. Citizen input was invited through a local newspaper advertisement, an announcement on the Polk County Website, and through an agenda announcement for the monthly HCPC membership meetings. Limited English proficient attendees were directed to a Housing and Neighborhood Development bi-lingual staff person.

Another overview and input workshop meeting was held December 13, 2021, for developers of affordable housing and interested citizens. The HOME ARP Allocation plan was review and the upcoming Request for Proposal (RFP) process was discussed.

To review the final draft of the HOME ARP Allocation Plan Polk County invited citizen participation through advertisement of the HOME-ARP Allocation Plan and public hearing in the Ledger the largest local newspaper, announced on the Polk County website, and available for review at the HND office anytime during. Public comment was open for 15 calendar days from May 9, 2022, to May 23, 2022. The virtual public meeting was held May 25, 2022.

*List the organizations consulted, and summarize the feedback received from these entities.*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeless Coalition of Polk County (CoC)	Homeless Services Organizations Membership and CoC Lead Agency	Workshop input meeting	<p>A PowerPoint overview of the HOME ARP Allocation Plan was presented to the HCPC members. After the presentation during the question-and-answer session the members discussed the lack of affordable rental housing in the County. Even with vouchers and housing subsidies clients have difficulty finding affordable rental units within the range allowed by the subsidized funding sources. Very few available units were affordable. The units within the affordable range, if they could be found, were in disrepair and would not pass the HQS inspections required by the housing assistance program funding. Discussion ensued as to the biggest gap being the lack of affordable units. Each agency agreement that the highest priority for the HOME ARP funds would be the provision of additional units available to the qualifying populations. This agency serves all four qualifying populations.</p>
Lakeland Housing Authority	Public Housing Authority City of Lakeland	Workshop Attendee	<p>Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.</p>
Winter Haven Housing Authority	Public Housing Authority City of Winter Haven	Workshop Attendee	<p>Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations</p>

			identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
Blue Sky Communities	Developers of Affordable Housing	Workshop Attendee	Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
Arbor Valley Communities	Developers of Affordable Housing	Workshop Attendee	Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
NuRock Acquisitions Florida, LLC	Developers of Affordable Housing	Workshop Attendee	Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
Community & Economic Development Department   Housing Division City of Lakeland	Municipality Office of Affordable Housing		Attended meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
Lake Wales Care Center	Faith based community service organization for the homeless	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	A PowerPoint overview of the HOME ARP Allocation Plan was presented to the HCPC members. Attendees commented that the biggest gap is the lack of affordable rental units in Polk County

Heart for Winter Haven	Local nonprofit agency utilizing a comprehensive community development strategy that emphasizes strengthening families through employability, housing stability and emotional/mental health support, all surrounded by faith affirming initiatives.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented the conclusion for the members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Salvation Army West Polk	The Salvation Army provides a wide range of traditional social services and emergency assistance programs	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Talbot House Ministries	Talbot House is Polk County's most comprehensive provider of services for homeless men and women. Through food, shelter, free medical and dental care, residential recovery programs, employment training and placement, and affordable housing opportunities, we restore hope and empower homeless men and women in Polk County to achieve self-sufficiency.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	The HOME ARP Allocation Plan was presented, and the discussions centered around services. The final conclusion for the members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Catholic Charities of Central Florida	Homeless Services, embracing those in need with hope, transforming their lives through faith, compassion, and service.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	The biggest need is affordable rental units was the conclusion after the HOME ARP Allocation Plan was presented to HCPC members for comment and input.

Florida Baptist Children's Homes	Services to vulnerable children and struggling families	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Tri-County Human Services, Inc	Tri-County Human Services, Inc. is a private, not-for-profit organization, providing substance abuse, mental health, and co-occurring treatment to residents of Polk County. Tri-County Human Services, Inc., which is CARF accredited is a United Way of Central Florida member agency and participates in the Community Foundation of Greater Lakeland and the Give Well Community Foundation.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Heartland for Children	Improving safety, permanency, and well-being for all children in Polk County. Helping to eliminate child abuse and neglect in Polk, County	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Women's Resource Center	Providing a variety of services for women and their families in crisis. Empowering women so that they can build better lives for themselves and their families. DV, Homeless Services	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.

Wilson House	<p>Focused on helping the marginalized community of those who suffer from a substance use disorder (SUD) or an alcohol use disorder (AUD) by providing safety, shelter, and an introduction to recovery.</p> <p>Individualized services include a trauma-informed care approach and a commitment to exploring the impact of resentments and other wellness needs while in our care.</p>	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	Attended HCPC meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP. Agrees with gap analysis showing the need for additional rental units for qualifying populations.
ACTS	<p>ACTS offers treatment to improve health through personal and family centered recovery practices. Providing and managing a broad array of human services including prevention, acute care and stabilization, treatment, and supportive services in the areas of substance abuse, co-occurring substance abuse and mental illness, child protection, delinquency, criminal justice, housing, economic self-sufficiency and health and wellness.</p>	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Youth & Family Alternatives	<p>Youth and Family Alternatives, Inc. is a private not-for-profit agency of over 300 staff who are committed to working with our families,</p>	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack



	communities, and state to establish, maintain and enhance a nurturing and safe environment for children.		of available affordable rental units for the clients.
Women and Youth Center	The WAY Center is a faith-based 501(c)(3) non-profit community agency providing services to women and youth in need or crisis. We are a place where women and youth can come to find help, comfort, and peace	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Salvation Army Winter Haven	The Salvation Army provides a wide range of traditional social services and emergency assistance programs	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Polk County Schools HEARTH Program	The HEARTH Project and Polk County Public Schools are dedicated to assisting homeless and in-transition families and children by eliminating barriers to school enrollment, attendance, stability, and overall academic success. We work to ensure that children experiencing homelessness have the same opportunities for educational success as housed students in Polk County.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Neighbor to Family	Neighbor To Family's nationally accredited and evidence-based sibling foster care program places abused and neglected children with their	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack

	siblings in safe and stable foster homes.		of available affordable rental units for the clients.
Guided Life Care Planning Services	<p>Guided Life Care Planning Services is a provider of Patient Advocacy and Support, Life Care Planning Services, Case Management and Vocational Services.</p> <p>Creating comprehensive care plans, while providing efficient and cost-effective service, that maximizes independence through lifestyle modification, alleviation of suffering caused by the diagnosis and prevention of complications.</p>	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Central Florida Behavioral Health Network	CFBHN is a t 501 (c) (3) corporation and a CARF International Accredited Services Management Network organization* contracting with community service organizations to provide a full array of publicly funded mental health and substance abuse services in Polk County including acute care, residential treatment, housing, medical, outpatient, recovery support, and prevention.	HCPC Membership meeting HOME ARP Allocation Plan presentation and input session	After the HOME ARP Allocation Plan was presented at the HCPC meeting the conclusion for members in attendance was the biggest gap is the lack of available affordable rental units for the clients.
Peace River DV Services	Established in 1978 Peace River Center Victim Services, <u>Domestic Violence Center</u> , and Rape Recovery Program is	HCPC member agency	New member of the Homeless Coalition of Polk County.

	the only certified center in Polk		
Lighthouse Ministries	Services include DV, residential programs, feeding and sheltering the homeless, and outreach centers within our thrift stores to assist low-income and at-risk families in West Central Florida.	HCPC member agency	New member of the Homeless Coalition of Polk County.
Sunrise Community Inc.	This agency serves the "Other Populations at risk of housing instability" qualifying population with the provision of supportive services for Persons <u>with Disabilities</u> . They do not provide housing units or shelter services. The agency estimated gaps in housing includes funding for ADA home renovations and gaps in Service Delivery Systems include funding to assist residents without benefits for Adult Training program services.	HCPC member agency	New member of the Homeless Coalition of Polk County and Polk County Public Services Grantee.
Polk County Veteran Services	Assists Florida <u>Veterans, Service</u> Members, family members and others with state, federal and other benefits.	Veteran Services one of four qualifying populations for the HOME ARP Projects.	One on One overview of the HOME ARP Allocation Plan and upcoming citizen review and comment meeting dates. Agree that is not enough available units for veterans needing affordable housing.
Florida Rural Legal Services.	<b>public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities</b>	Providing free legal services to vulnerable and low-income clients	Phone review of HOME ARP Allocation Plan. Agreed with results of priority needs and gaps analysis.

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## 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, - Polk County received \$5,105,519
- The range of activities the PJ may undertake – Polk County will undertake multi-family new construction/development.

***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: start date – 5/09/2022 end date – 5/23/2022***
- ***Public Meeting: 5/25/2022***

Summary of comments:

Two comments were received during the Public Meeting:

- 1.) On the displayed funding chart, why is the SHIP total cost \$500,000. It should be \$21,721,258 and the units need to be revised too. This was corrected in the chart after the meeting.
- 2.) The Executive Director of the Homeless Coalition of Polk County, Bridget Engleman, asked if the units did not lease up with the clients in the qualifying populations could they be leased to other populations. During the follow up phone call to address this question HND staff explained that the units must be leased to the qualifying populations listed in the HOME Notice: CPD-21-10 Issued: September 13, 2021. Discussion ensued regarding the availability of tenant vouchers for these units. HND staff indicated that during the upcoming planning process for the next grant year this request would be brought forth for funding request and review.

Describe any efforts to broaden public participation:

Efforts to broaden public participation included advertisement of the public comment period and public hearing in the local newspaper, with a staff contact for the Limited English Proficiency (LEP) population needing information in Spanish. The draft HOME-ARP Allocation Plan was made available on the Polk County Housing and Neighborhood Development website for public review, in Spanish and an ADA compliant format.

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:***

During the Public Meeting held May 25, 2022, the Executive Director of the Homeless Coalition of Polk County asked if the units were not filled with the qualifying populations could they be rented to other residents. HND staff called and explained that all units were to be leased to qualifying populations as outlined in the CPD-21-10 Notice Requirements for the Use of Funds in the HOME -American Rescue Plan Program.

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

All comments and recommendations were accepted.

## **Needs Assessment and Gaps Analysis**

The Polk County Housing and Neighborhood Development Office evaluated the size and demographic composition of qualifying populations within its boundaries and assessed the unmet needs of those populations. After consulting with the Continuum of Care Providers, members of the Homeless Coalition of Polk County, citizens and interested developers of affordable we identified gaps within our current shelter and housing inventory as well as the service delivery system. Current census and housing data, including the point in time count, housing inventory count, and other data available through CoCs was used to identify the gap of available affordable rental units in Polk County. After consultations with service providers, it was abundantly clear that the individuals and families in the qualifying populations had an urgent need for additional housing, shelter, and services. The tables provided below illustrate the need and gaps in available affordable rental units.

According to the Polk Vision LEAD Behavioral Health Strategic Plan Development and Sequential Intercept Mapping Report published June 2021; Gap Analysis and Needs Assessment was conducted through stakeholder interviews, community surveys, and group discussions. Both availability and affordability of housing were addressed, and many cited the need for more places for certain populations, such as people experiencing homelessness who also suffer from substance misuse, and victims of domestic violence. Issues accompanying homelessness or related issues dominate list of ranked community issues. Housing, social services, and healthcare for people experiencing homelessness are seen as requiring much more focus

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