

COLUMBUS CONSOLIDATED GOVERNMENT

2024 ANNUAL ACTION PLAN

MAY 2024



Executive Summary

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

1. Introduction

The City of Columbus's 2024-2025 Annual Action Plan provides a comprehensive strategy for leveraging Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG), funds from the U.S. Department of Housing and Urban Development (HUD) in the 2024 program year. This plan details the anticipated completion of CDBG, HOME, and ESG projects, funding allocations, associated activities, and projected beneficiaries. Notably, the 2024 program year marks the fourth phase of implementation under Columbus's 2021-2025 Five Year Consolidated Plan, which establishes priorities and directives for HUD fund allocation over a half-decade period. During this year, Columbus is committed to addressing critical needs such as housing affordability, bolstering public services, enhancing public facilities and infrastructure, promoting fair housing practices, and optimizing program administration. By aligning with these priorities, the City aims to efficiently utilize HUD funds to foster sustainable community development and improve the quality of life for its residents.

2. Summarize the objectives and outcomes identified in the Plan

Priority needs for the 2021 through 2025 planning period were developed based on citizen participation, stakeholder consultation, and analysis of the city's top housing, homeless, special needs populations, and non-housing community development needs. These priorities included:

Expansion of Affordable Housing Supply

Development of new single-family and multifamily affordable housing units for both homeownership and rental, to include elderly housing units and units produced by qualifying Community Housing Development Organizations.

Housing Rehabilitation

Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households.

Housing Assistance and Navigation

Supportive programs and services to increase housing access and safety, including accessibility modifications to existing homes, down-payment assistance, tenant-based rental assistance, and lead-based paint testing.

Infrastructure and Public Facility Improvements

Promote quality of life and neighborhood revitalization through improvements to current public infrastructure and facilities.

Public Services

Services provided by nonprofit organizations that benefit low-income residents such as homeless, youth, disabled, elderly, and other special populations.

Fair Housing

Provide services to residents and housing providers to advance fair housing.

COVID-19 Response

Funding to mitigate the impacts of COVID-19 such as temporary rent, mortgage or utility assistance; financial assistance to small businesses, and other pandemic-related community support.

Expanding the Availability of Homeless Services and Housing

Support agencies that provide services and housing to persons that are homeless, or at risk of homelessness.

Program Administration

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations.

3. Evaluation of past performance

Annually, the City of Columbus assesses its advancements toward both its long-term and yearly objectives through the creation of a Consolidated Annual Performance Evaluation Report (CAPER). This report must be submitted to HUD within 90 days of the commencement of a new program year. Copies of recent CAPERs can be examined at Columbus's Community Reinvestment and Real Estate Department or accessed online at:

<https://www.columbusga.gov/communityreinvestment/Planning/CAPER>.

4. Summary of citizen participation process and consultation process

Throughout the program year, the City of Columbus engages in diverse public outreach efforts to gather input from city staff, government and non-profit agencies, affordable housing developers, local service providers, and residents.

During the preparation of this Annual Action Plan, the City held a formal public hearing on January 8, 2024, to gather input from interested stakeholders. A second Public Hearing was held on April 2, 2024, to gather feedback on the draft. This input is summarized in the Participation section of this document. Public comments on the draft Annual Action Plan were received throughout a 30-day public comment period from March 22, 2024, to April 22, 2024. A third public hearing will be held on September 11, 2024, to gather feedback on the draft Annual Action Plan that includes ESG as a new funding source. Public comments on the draft Annual Action Plan were accepted during a 30-day public comment period from August 28, 2024, to September 27, 2024. No comments were received during the comment period.

5. Summary of public comments

The City did not receive any comments relevant to the 2024-2025 Annual Action Plan during the Public Comment Periods or at the Public Hearings held on April 2, 2024, and September 11, 2024.

6. Summary of comments or views not accepted and the reasons for not accepting them.

Not applicable; the City has not received any comments.

7. Summary

During the 2024-2025 program year, the City of Columbus will use its CDBG, HOME, and ESG funds to address priorities identified in its 2021-2025 Five-Year Consolidated Plan. Specifically, Columbus will fund affordable housing creation, public services and public facility and infrastructure improvements, fair housing, homelessness services and housing, and program administration.

The Process

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	COLUMBUS	The Community Reinvestment Department
HOME Administrator	COLUMBUS	The Community Reinvestment Department
ESG Administrator	COLUMBUS	The Community Reinvestment Department

Table 1 – Responsible Agencies

Narrative

Columbus falls under the U.S. Department of Housing and Urban Development’s CDBG, HOME and ESG programs as an entitlement community. The Annual Action Plan outlines projects slated for funding during the 2024 program year, spanning from July 1, 2024, to June 30, 2025.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(i)

1. Introduction

In the 2021-2025 Consolidated Plan development, Columbus involved 94 residents and stakeholders through meetings, focus groups, interviews, and a survey. The findings were outlined in the Community Participation section of the Consolidated Plan. Additionally, for the 2024 Annual Action Plan interviews were conducted with The Housing Authority of Columbus Georgia and United Way Home For Good.

Ahead of City Council approval and submission to HUD, Columbus plans a 30-day public comment period and a public hearing to gather input from residents and stakeholders on the draft Annual Action Plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(i)).

Columbus collaborates with local medical and housing providers, including mental health services. MercyMed, a partner, offers counseling to low- and moderate-income households. Additionally, the city teams up with NeighborWorks, Habitat for Humanity, and the Land Bank Authority to construct new housing and refurbish existing homes in low- to moderate-income areas. Through these partnerships, Columbus fulfills a crucial function in aligning housing and mental health services for households with limited financial means.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Columbus is represented on the executive committee of the Columbus-Muscogee/Russell County Continuum of Care. Through monthly participation on the committee, city staff help decide strategies to address homelessness in the region. The City also supports several homelessness agencies, including the Southwest Georgia Housing Opportunities, Home for Good, SafeHouse, and the Open Door Community House as they provide direct services to the chronically homeless and families transitioning out of homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction’s area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.

The City plays an active role with the Columbus-Muscogee/Russell County Continuum of Care, the City helps to determine the allocation of ESG funds according to the city's 10 Year Plan to End Homelessness and the 5-Year Consolidated Plan. During the City's tenure on the executive committee, the CoC has also updated its Data Quality Management Plan with the HMIS Committee and has introduced system performance measures to lower error rates during data collection.

In May 2024, the City of Columbus was awarded an ESG entitlement grant. During an interview conducted in August 2024 for this Consolidated Plan substantial amendment, Home for Good staff recommended allocating ESG funds towards homelessness prevention (e.g., rental assistance), as this service need was identified as having the least amount of funding. As a new ESG recipient, the City will utilize performance standards and evaluation techniques from Home for Good's Data Quality Management Plan to ensure low data quality error rates. Performance standards provide a measure for ESG grantees to evaluate the effectiveness of each ESG service provider in the areas of (a) targeting those who need assistance most; (b) reducing the number of people who are homeless or in emergency shelters; (c) reducing the time people spend homeless, and (d) reducing clients' housing barriers or housing stability risks.

To support the funding and policies and procedures of HMIS, Home for Good staff recommended that the City could also assist by funding HMIS licenses and administrative costs.

2. Describe agencies, groups, organizations, and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

	Agency/Group/Organization Name	Type	Section of the Plan Addressed
1	Chattahoochee Valley Libraries	Services - Education	Market Analysis Non-homeless Special Needs
2	City of Columbus, City Council	Other - Elected Officials	Economic Development Housing Need Assessment Market Analysis Non-homeless Special Needs

3	City of Columbus, Community Reinvestment	Other – City Staff	Housing Need Assessment Market Analysis Non-homeless Special Needs
4	City of Columbus, Fire & EMS	Agency – Emergency Management	Market Analysis Non-homeless Special Needs
5	City of Columbus, Parks and Recreation	Services – Children	Market Analysis Non-homeless Special Needs
6	City of Columbus, Planning Department	Other – City Staff	Housing Need Assessment Market Analysis
7	Coldwell Banker KPDD	Housing	Market Analysis Non-homeless Special Needs
8	Columbus 2025	Business and Civic Leaders	Economic Development Market Analysis Non-homeless Special Needs
9	Columbus-Phenix City MPO	Other – Transportation	Market Analysis Non-homeless Special Needs
10	Habitat for Humanity	Services – Housing	Housing Need Assessment Market Analysis
11	Home for Good	Services – Homeless	Homeless Needs – Families with Children Homeless Needs – Unaccompanied Youth Homelessness Strategy Market Analysis
12	Homeless Resource Network	Services – Homeless	Homeless Needs – Families with Children Homeless Needs – Unaccompanied Youth Homeless Needs – Veterans Homelessness Strategy

			Market Analysis
13	Hope Harbour	Services – Victims of Domestic Violence	Housing Need Assessment Market Analysis
14	Housing Authority of Columbus, GA	Public Housing Authority	Public Housing Needs
15	MercyMed	Health agency	Housing Needs Assessment Market Analysis Non-Homeless Special Needs
16	NeighborWorks	Services - Housing	Housing Need Assessment Market Analysis
17	Paz Amigos	Services - Homeless	Homelessness Strategy Non-homeless Special Needs

Table 2 – Agencies, groups, organizations who participated

Identify any agency types not consulted and provide rationale for not consulting.

During the Consolidated Plan process, a wide variety of community stakeholders throughout the City of Columbus were consulted. A total of 61 professionals were invited to participate in a stakeholder interview. Invitations to participate were emailed to stakeholders or offered by phone. Stakeholders invited to participate represented the following fields: housing developers, real estate agents, public housing authorities, colleges and universities, homeless services, domestic violence services, school districts, non-profit organizations, health service providers, workforce development organizations, businesses, faith-based coalitions, ethnic group organizations, mental health providers, senior services, transit authorities, elected officials, city staff, libraries, emergency management agencies, legal services providers and regional planning organizations. No agency types were excluded from outreach efforts.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
10 Year Plan to End Homelessness	Columbus Consolidated Government	The 10 Year Plan aims to make homelessness “atypical, temporary, and non-recurring” through the collaboration of service providers across the city. Eliminating homelessness corresponds with the strategic plan’s public services and affordable housing goals.
2024 Annual Moving to Work Plan	Housing Authority of Columbus, GA	Goals of the 2024 Annual Moving to Work Plan Year, includes the continuation of the RAD/Section 18 Blend conversion process for the remaining 424 public housing units throughout the city. The creation of additional units for low-income households overlaps with the Strategic Plan goal to expand affordable housing supply.
Columbus 2025 Plan	Greater Columbus, GA Chamber of Commerce	The guiding principles of the Columbus 2025 Plan include “increasing prosperity, improving quality of life and reducing poverty.” Quality of life goals described in the Columbus 2025 overlap with the Strategic Plan’s goals of infrastructure and public facility improvements and expansion of affordable housing supply.
Columbus Consolidated Government 2038 Comprehensive Plan	Columbus Consolidated Government	Some of the goals highlighted in the 2038 Comprehensive Plan include expanding opportunities for walking, biking, and transit, growing and expanding businesses, and improving access to affordable, quality housing. These goals, along with others listed in the Comprehensive Plan, align with the Strategic Plan goals to rehab housing, expand affordable housing supply, provide public services, and improve infrastructure and public facilities.

Columbus – Muscogee County Hazard Mitigation Plan Update, 2017–2022	Columbus Consolidated Government	Goals of the city’s Hazard Mitigation Plan include reducing/eliminating community exposure to natural and manmade events and reducing loss to public and private property. These goals indirectly relate to the Strategic Plan’s overall goals of maintaining and expanding affordable housing and protecting and improving infrastructure and public facilities.
River Valley Regional Commission Comprehensive Economic Development Strategy (CEDS)	River Valley Regional Commission	The goals of the CEDS Plan include assisting the workforce of the region, improving infrastructure and improving housing stock – which align with the Strategic Plan goals of housing rehabilitation and infrastructure improvements.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional):

N/A

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

The City held a workshop on January 8, 2024, to review the city’s 2021–2025 Consolidated Plan priorities. At the workshop staff described eligible activities, provided an estimate of PY 2024 funding, and explained the city’s subgrantee application process. A formal public hearing will be held on Monday, April 2, 2024, to discuss the proposed activities to be funded in the program year. A third public hearing will be held on Wednesday, September 11, 2024, to discuss the addition of ESG to the Annual Action Plan.

Summarize citizen participation process and how it impacted goal setting

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/Broad community	N/A	N/A	N/A	N/A
2	Internet Outreach	Non-targeted/Broad community	N/A	N/A	N/A	N/A
3	Public Hearing	Non-targeted/Broad community	No comments received	N/A	N/A	N/A

4	Public Comment Period	Non-targeted/Broad community	No comments received	N/A	N/A	N/A
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Columbus receives annual allocations of CDBG, HOME, and ESG funds for housing construction, rehabilitation initiatives, public services, economic development, and other eligible activities. These funding sources are expected to remain available over the five-year term of the 2021-2025 Consolidated Plan. The table below shows the City’s CDBG, HOME, and ESG allocations for the 2024 program year, including prior year resources.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - federal	Acquisition Admin and Planning Economic Development Housing	\$1,701,526	\$0	\$0	\$1,701,526	\$1,701,526	Block grant from HUD to address housing, community development and economic development needs in the City.

		Public Improvements Public Services						
HOME	Public - federal	Acquisition Homebuyer down payment assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance	\$914,862.28	\$0	\$0	\$914,862.28	\$914,862.28	Grant from US Department of Housing and Urban Development to address affordable housing needs in the City.
ESG	Public - federal	Administration Emergency Shelter Homelessness Prevention	\$145,932	\$0	\$0	\$145,932	\$145,932	Grant from US Department of Housing and Urban Development to address

		Rapid Re-housing HMIS						homelessness needs in the City.
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Table 2 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

Nonprofit organizations, as subrecipients of CDBG, HOME, and ESG funds from the City, enhance their finances through foundation support and fundraising. These external resources expand the reach of City-sponsored programs. The City also encourages seeking additional public and private funds, in line with the Consolidated Plan. Federal funding enables these organizations to extend services to low to moderate-income individuals.

HUD's HOME Program requires a 25% match from non-federal fund sources. Per these requirements, the City requires organizations who receive HOME funding to provide a 25% match using non-federal funds, which is verified through a report submitted to the City on an annual basis.

HUD's ESG Program requires a 100% match. Per these requirements, the City requires organizations who receive ESG funding to provide a 100% match, which is verified through a report submitted to the City on an annual basis.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

The City continues to identify properties in its portfolio that can be surplus and conveyed as affordable housing or other beneficial uses for the community. Additionally, the Columbus Land Bank Authority has a stated goal of providing land to be used in the creation of affordable housing and jobs for LMI citizens through residential, commercial, and industrial development.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expansion of Affordable Housing Supply	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Expansion of Affordable Housing Supply	HOME: \$823,376.05	Rental units constructed: 1 housing unit Homeowner Housing Added: 11 housing units
2	Housing Rehabilitation	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Housing Rehabilitation	CDBG: \$100,000	Homeowner Housing Rehabilitated: 8 housing units
3	Blight Removal	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Blight Removal	CDBG: \$246,165	Buildings Demolished: 4 buildings

4	Infrastructure and Public Facility Improvements	2024	2025	Non-Housing Community Development	Citywide South Columbus NRSA	Infrastructure and Public Facility Improvements	CDBG: \$759,826.90	Public Facility or Infrastructure Activities other than Low/ Moderate Income Housing Benefit: 4,871 persons assisted
5	Public Services	2024	2025	Non-Housing Community Development Homelessness Non-Homeless Special Needs	Citywide South Columbus NRSA	Public Services	CDBG: \$255,280.90	Public service activities other than Low/ Moderate Income Housing Benefit: 10,484 persons assisted
6	Fair Housing	2024	2025	Other: Fair Housing	Citywide	Fair Housing	CDBG: \$0	Public service activities other than Low/ Moderate Income Housing Benefit: 0 persons assisted
7	COVID-19 Response	2024	2025	Other: COVID-19 Response	Citywide	COVID-19 Response	CDBG: \$0	Public service activities other than Low/ Moderate Income Housing Benefit: 0 persons assisted
8	<i>Expanding the Availability of Homeless</i>	2024	2025	Homelessness	Citywide South Columbus	Homelessness	ESG: \$134,987.10	Homeless overnight shelter: 40 persons assisted Rapid Rehousing: 5 persons

	<i>Services and Housing</i>				NRSA			assisted Homelessness Prevention: 5 persons assisted
8	Program Administration	2024	2025	Other: Program Administration	Citywide	Program Administration	CDBG: \$340,305.20 HOME: \$91,486.23 ESG: \$10,944.90	N/A

Table 2 – Goals Summary

Goal Descriptions

Goal 1: Expansion of Affordable Housing Supply

Development of new single-family and multifamily affordable housing units for both homeownership and rental, to include elderly housing units and units produced by qualifying Community Housing Development Organizations.

Goal 2: Housing Rehabilitation

Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households.

Goal 3: Housing Assistance and Navigation

Supportive programs and services to increase housing access and safety, including accessibility modifications to existing homes, down-payment assistance, tenant-based rental assistance, and lead-based paint testing.

Goal 4: Infrastructure and Public Facility Improvements

Promote quality of life and neighborhood revitalization through improvements to current public infrastructure and facilities.

Goal 5: Public Services

Services provided by nonprofit organizations that benefit low-income residents such as homeless, youth, disabled, elderly, and other special populations.

Goal 6: Fair Housing

Provide services to residents and housing providers to advance fair housing.

Goal 7: COVID-19 Response

Funding to mitigate the impacts of COVID-19 such as temporary rent, mortgage or utility assistance; financial assistance to small businesses, and other pandemic-related community support.

Goal 8: Expanding the Availability of Homeless Services and Housing

Support agencies that provide services and housing to persons that are homeless, or at risk of homelessness

Goal 9: Program Administration

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations.

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects listed below represent the activities Columbus plans to undertake during the 2024 program year to address the goals of providing decent safe and affordable housing, promoting a suitable living environment, and encouraging investment in infrastructure.

Projects

#	Project Name
1	CDBG Administration
2	Public Service Grants
3	Demolitions
4	Infrastructure and Public Facilities
5	Housing Rehabilitation
6	HOME Administration
7	Affordable Housing Development
8	Community Housing Development Organization (CHDO) Reserve
9	Community Housing Development Organization (CHDO) Operating Costs
10	ESG Administration
11	ESG

Table 3 – Project Information

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

The City's allocation priorities reflect its focus on several needs identified through data analysis, community member input, consultation with City staff and other public agencies, and reviews of relevant plans and studies, such as the 2038 Comprehensive Plan. Key priorities include funding public services, public facilities and infrastructure, and affordable housing development.

The City does not anticipate any obstacle to completing the projects it has identified for the 2024-2025 program year.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	\$340,305.20
	Description	CDBG Program Administration
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	N/A
	Location Description	Department of Community Reinvestment and Real Estate, 420 10 th Street, Columbus, GA 31901
	Planned Activities	Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
2	Project Name	Public Service Grants

	Target Area	Citywide South Columbus NRSA
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	\$255,228.90
	Description	Provision of broad public services covering health, education and homelessness.
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	10,484 persons assisted
	Location Description	Citywide
	Planned Activities	Education and career development, healthcare programming, rapid re-housing, financial and wealth building, mentoring, virtual learning programs, CoC and homeless programs, tutorial program, trade-skill training, and similar programs and services designed to benefit LMI persons
3	Project Name	Demolitions
	Target Area	Citywide

	Goals Supported	South Columbus NRSA
	Needs Addressed	Blight Removal
	Funding	\$246,165
	Description	Demolition of dilapidated structures
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	4 units
	Location Description	Citywide
	Planned Activities	Demolition
4	Project Name	Infrastructure and Public Facilities
	Target Area	Citywide South Columbus NRSA
	Goals Supported	Infrastructure and Public Facilities Improvements

	Needs Addressed	Infrastructure and Public Facilities Improvements
	Funding	\$759,825.90
	Description	Improvements to recreational facilities in low-to-moderate income census tracts.
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	4,871 persons assisted
	Location Description	Citywide
	Planned Activities	Sidewalks, Street Improvements, Public Facility Improvements
5	Project Name	Housing Rehabilitation Program
	Target Area	Citywide South Columbus NRSA
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	\$100,000

	Description	Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households. Provision of accessibility upgrades to income eligible households. Provision of lead-based paint testing to income eligible households.
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	8 household housing units
	Location Description	Citywide
	Planned Activities	Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households. Provision of accessibility upgrades to income eligible households. Provision of lead-based paint testing to income eligible households.
6	Project Name	HOME Program Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	\$91,486.23

	Description	HOME Program Administration
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	N/A
	Location Description	Department of Community Reinvestment and Real Estate, 420 10 th Street, Columbus, GA 31901
	Planned Activities	Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
7	Project Name	Affordable Housing Development
	Target Area	Citywide South Columbus NRSA
	Goals Supported	Expansion of Affordable Housing Supply
	Needs Addressed	Expansion of Affordable Housing Supply
	Funding	\$636,146.71 (HOME: \$636,146.71)

	Description Target Date Estimate the number and type of persons that will benefit from the proposed activity Location Description Planned Activities	Development of affordable single-family rental and homeowner units. Down-payment assistance. June 30, 2025 12 household housing units Citywide Development of affordable single-family rental and homeowner units. Down-payment assistance.
8	Project Name Target Area Goals Supported Needs Addressed Funding Description	Community Housing Development Organization (CHDO) Reserve Citywide South Columbus NRSA Expansion of Affordable Housing Supply Expansion of Affordable Housing Supply \$137,229.34 Acquisition and/or rehabilitation of homebuyer properties

	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	1 household housing unit
	Location Description	Citywide
	Planned Activities	Acquisition and/or rehabilitation of homebuyer properties
9	Project Name	Community Housing Development Organization (CHDO) Operating Costs
	Target Area	Citywide South Columbus NRSA
	Goals Supported	Expansion of Affordable Housing Supply
	Needs Addressed	Expansion of Affordable Housing Supply
	Funding	\$50,000
	Description	Salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; materials; and supplies.
	Target Date	June 30, 2025

	Estimate the number and type of persons that will benefit from the proposed activity	12
	Location Description	Citywide
	Planned Activities	Salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; materials; and supplies.
10	Project Name	ESG Program Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	\$10,944.90
	Description	ESG Program Administration
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	N/A

	Location Description	Department of Community Reinvestment and Real Estate, 420 10 th Street, Columbus, GA 31901
	Planned Activities	Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
11	Project Name	ESG
	Target Area	Citywide
	Goals Supported	Strategies to Adress Homelessness
	Needs Addressed	Homelessness Strategy
	Funding	\$134,987.10
	Description	Funds will be used to support ESG eligible services in emergency shelter, homelessness prevention, rapid rehousing, and HMIS.
	Target Date	June 30, 2025
	Estimate the number and type of persons that will benefit from the proposed activity	Approximately 50 residents will be provided ESG eligible services in emergency shelter, rapid rehousing and/or homelessness prevention.
	Location Description	Citywide

Planned Activities

Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and HMIS.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed:

The City directs its CDBG, HOME, and ESG funds into two geographic areas: a Citywide target area and the South Columbus NRSA. The Citywide target area encompasses the entirety of the City of Columbus, allowing the City to direct CDBG HOME, and ESG funds to eligible activities throughout the city. Within the Citywide target area, neighborhoods where the percentage of LMI persons is 51% or higher will be prioritized for CDBG funding. The South Columbus NRSA is a smaller area within the city limits, which is home to approximately 10.8% of the city's total population. An estimated 72% of the residents in the South Columbus NRSA have low or moderate incomes. Eligible activities within both the South Columbus NRSA and Citywide target area include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

Geographic Distribution

Target Area	Percentage of Funds
South Columbus NRSA	20%
Citywide	80%

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In keeping with the intent and regulations of the federal CDBG, HOME, and ESG Programs, the City of Columbus will focus its funding in neighborhoods that are predominately composed of low- and moderate-income households and that have substantial needs related to housing quality and affordability, public facilities and infrastructure, and economic development.

The system for establishing the priority for the selection of these projects in Columbus is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Prioritizing investment in the South Columbus NRSA
- Focusing on LMI areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs

- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

Discussion

The South Columbus NRSA is located west of Interstate 185 roughly bound by Brown Avenue and Lumpkin Road on the west, State Spur 22 in the north, and Fort Moore in the south. The portion of the NRSA east of Interstate 185 is bound generally by Old Cusseta Road on the north and east and by Fort Moore in the south. The area is comprised primarily of residential neighborhoods and neighborhood commercial shopping centers. Neighborhoods in the NRSA include Wynnton, Willett, and Avondale Heights. According to HUD's low/moderate income data based on the 2015 ACS, nearly three quarters (72.0%) of residents in the South Columbus NRSA have low or moderate incomes. Residents with low or moderate incomes comprise a significantly larger share in the NRSA compared to the overall population of the city where roughly a third of all residents have low or moderate incomes (39.9%).

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Over the next program year, the City of Columbus plans to assist 12 homebuyers through the production of affordable for-sale units. The City of Columbus also intends to assist 16 households through homelessness prevention activities.

One Year Goals for the Number of Households to be Supported	
Homeless	16
Non-Homeless	12
Special-Needs	0
Total	28

Table 3 – One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	16
The Production of New Units	12
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	28

Table 4 – One Year Goals for Affordable Housing by Support Type

Discussion

The estimates in the tables above are derived from the anticipated PY 2024 CDBG, HOME, and ESG projects and activities.

AP-60 Public Housing – 91.220(h)

Introduction

Founded in 1938, the Housing Authority of Columbus, Georgia (HACG) provides publicly supported housing options for Columbus residents. The HACG also manages and maintains (but does not own) the Harris County, Ellaville, and Buena Vista Housing Authorities. In 2013, the HACG became one of 39 initial Moving To Work agencies. Having shown success with this designation, the HACG has expressed its long-term plans to become a regional Moving To Work agency.

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

During its 2024 Moving To Work Plan Year, the HACG plans to continue the RAD/Section 18 Blend conversion process for the remaining 424 public housing units throughout the city. Under this conversion process, the conventional public housing units at Warren Williams + Rivers Homes and Elizabeth F. Canty Homes will become project-based Section 8 voucher units. Once converted there will be no more conventional public housing properties in Columbus, GA.

In 2023, HACG began construction of 90 new mixed-income housing units. BTW South will contain 80 units for low-income seniors earning no more than 60% AMI, and 10 market rate units. This project will be funded utilizing 9% LIHTC, along with other funding sources such as HUD MTW funds, HOME and CDBG. As part of the RAD/Section 18 Blend conversion of Warren Williams + Rivers Homes, the property will be substantially rehabilitated through the use of 4% LIHTC/private activity bonds allocated by the Georgia Department of Community Affairs (DCA). All 182 units will be reserved for low-income families earning 60% or below AMI and project-based Section 8 voucher holders earning no more than 50% AMI. All current residents will be temporarily relocated during construction and relocated back to the site once construction is complete.

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

Public housing residents are encouraged to become involved in management with the HACG. The housing authority provides a placement for an HACG resident to serve as a commissioner on the HACG leadership team. Residents are also invited to participate in hearings regarding its Annual Moving To Work Plan and year-end report. The HACG collects and replies to resident comments on these plans. Resident comments are recorded in the final version of the annual plan.

To encourage public housing residents to participate in homeownership, the HACG offers a voluntary Family Self-Sufficiency program to help residents achieve increased financial stability over a 5-year period. The program offers career counseling, job readiness programs, and money management courses. Childcare and transportation assistance are provided.

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

Not applicable.

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

Introduction

Columbus is a participant in the Columbus-Muscogee Continuum of Care, aimed at fostering a collective community commitment to eradicating homelessness. This collaborative effort involves partner agencies working together to enhance access to and utilization of their programs. Columbus remains dedicated to collaborating with the Continuum of Care and local homelessness service providers to realize the city's objectives in addressing homelessness.

The City of Columbus will utilize \$145,932 of FFY 2024 Emergency Solutions Grant entitlement funding for eligible services in emergency shelter, homelessness prevention, rapid rehousing, HMIS, and the administration of the ESG program.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

One of the City's priorities for the 2021-2025 Consolidated Plan was to expand the availability of homeless services and housing. Activities funded under this priority may include outreach to unsheltered homeless persons. Local homelessness service providers include the United Way of the Chattahoochee Valley and The Salvation Army. These organizations offer outreach to people experiencing homelessness by providing food, clothing, and other resources.

Actions to address homeless outreach needs in the 2024 program year include:

- Supporting the Continuum of Care by providing funding for homeless outreach services.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through the City's HOME-ARP funding (slated for implementation beginning July 1, 2023), Columbus will contribute \$1,167,947 toward the development of 17 family shelter units to be operated by the Columbus Salvation Army. The City will also contribute \$50,000 in HOME-ARP to Hope Harbour, the region's domestic violence emergency shelter. During PY 24, the City of Columbus may fund services provided by emergency or transitional housing providers, such as the United Way of the Chattahoochee Valley, and The Salvation Army. These providers will continue to offer emergency and transitional housing for people experiencing homelessness.

Actions to address emergency shelter and transitional housing needs in the 2024 program year include:

- Funding through ESG for emergency shelter, homelessness prevention, rapid rehousing, and HMIS
- Funding through HOME-ARP to support development of 17 new family shelter units
- Supporting the PATH Stability Program
- Funding supportive services for victims of domestic violence
- Conducting rapid re-housing for homeless families

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Columbus and the Columbus-Muscogee CoC support a Housing First model that prioritizes permanent housing and offers case management and other supportive services. The Housing First model supports one of the CoC's priorities, which is to increase access to affordable and permanent supportive housing.

Actions to assist residents experiencing homelessness in making the transition to permanent housing in the 2024 program year include:

- Supporting the PATH Stability Program
- Funding supportive services for victims of domestic violence
- Conducting rapid re-housing for homeless families

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Housing and service providers in Columbus work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. At-risk populations include extremely low-income individuals and families, people discharged from institutions, and persons receiving direct assistance with housing, health, social services, education or youth needs. Local service providers such as The Salvation Army offer rent and utility assistance in the city.

Actions to prevent homelessness in the 2024 program year include:

- Conducting rapid re-housing for homeless families

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

In the upcoming year, the department is gearing up to tackle the challenges posed by various public policies hindering affordable housing. These policies encompass a broad spectrum, ranging from land use controls and tax policies to zoning ordinances and building codes. Recognizing the detrimental impact of these policies, stakeholders have pinpointed the city's property tax structure in Columbus as a significant barrier to affordable housing. At present, homeowners benefit from a homestead exemption tied to the year of purchase, effectively freezing the assessed value of their properties and locking in a fixed tax payment for the duration of their ownership. This tax structure, implemented since 1983, means that property taxes only see adjustments upon sale, improvement, or overall tax rate changes. Despite efforts in 2016, when Columbus citizens voted against a proposition to alter this structure, the community remains committed to exploring avenues to address these housing affordability challenges.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Instead of continuing to explore additional adjustments to property taxes, Columbus introduced a new proposal: a 1% increase in sales tax. This proposition received voter approval in November 2021, resulting in a raise of the local sales tax rate from 8% to 9%. The revenue generated from this Special Purpose Local Option Sales Tax (SPLOST) will be allocated towards financing a new judicial building and bolstering the city's public safety budget. This measure is expected to remain effective for a duration of 9 months, during which the community aims to address pressing infrastructure and safety needs without burdening property owners further. The decision to opt for a sales tax hike reflects a strategic shift in funding mechanisms, diversifying revenue sources and distributing the financial responsibility across a broader base of contributors. Proponents argue that this approach ensures that essential civic projects receive adequate funding while mitigating the strain on property owners who may already be grappling with housing affordability challenges. The successful passage of the SPLOST underscores the community's willingness to explore innovative solutions to meet its evolving needs and demonstrates a commitment to responsible fiscal management.

AP-85 Other Actions – 91.220(k)

Introduction:

This section delineates the City of Columbus's comprehensive approach to safeguarding residents' access to safe, affordable housing while also targeting underserved populations, combating poverty, establishing

robust institutional frameworks, and fostering stronger collaboration among public and private sector entities engaged in housing and community development initiatives.

Actions planned to address obstacles to meeting underserved needs

During the Consolidated Plan planning process, residents and stakeholders voiced concerns about the significant gap in accessible, well-maintained affordable housing. Identifying key barriers, they highlighted:

High development expenses,

Necessity for subsidies to facilitate new affordable housing projects, and

Erosion of existing affordable housing due to rising rents and aging infrastructure requiring renovations.

Moreover, residents and stakeholders stressed the urgency for expanded facilities and services catering to low-income individuals and homeless populations. These services encompass job creation, vocational training, entrepreneurial support, childcare, and case management.

In response, the City of Columbus intends to allocate funding towards a diverse array of initiatives addressing these unmet needs in housing, services, and infrastructure. The goal is to bridge the gap in affordable housing while simultaneously bolstering support systems for vulnerable populations, thereby enhancing community resilience and fostering sustainable growth.

Actions planned to foster and maintain affordable housing

The City does not have any plans to refinance existing debt secured by multifamily housing and therefore does not have any refinancing guidelines for that activity.

To bolster and diversify the existing stock of affordable housing, the City aims to forge partnerships with non-profit housing entities and private firms, with the primary objective of augmenting the availability of affordable housing options. Collaborative efforts may involve engaging LIHTC (Low-Income Housing Tax Credit) developers or other entities contemplating housing ventures within the city limits. Additionally, the City will explore avenues for securing funding or grants that can be leveraged to inject fresh capital into affordable housing initiatives or programs.

Building upon its commitment to enhancing housing affordability, the City will sustain momentum through various ongoing initiatives. These include the homebuyer down payment assistance program and Homeowner occupied rehabilitation, which facilitates crucial repairs and installations encompassing heating and air conditioning systems, roofing, flooring, plumbing, electrical updates and repairs, windows, and exterior doors.

Actions planned to reduce lead-based paint hazards

In the past decade, HUD has prioritized the mitigation of lead-based paint hazards, an effort echoed by numerous jurisdictions nationwide. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992, an amendment to the Lead-Based Paint Poisoning Prevention Act of 1971, regulates lead-based paint in federally funded housing. These statutes, alongside subsequent regulations outlined in the U.S. Department of Housing and Urban Development's guidelines (24 CFR, part 35), safeguard young children from lead exposure in housing receiving financial assistance or undergoing federal sale.

In the event of property rehabilitation projects, the City of Columbus will conduct assessments to determine the presence of lead-based paint. If identified, the City will adhere to the provisions outlined in the Residential Lead-Based Paint Hazard Reduction Act of 1992. Demonstrating its dedication to this cause, the City of Columbus pledges to test and mitigate lead in all pre-1978 housing units benefiting from federal grant funds across its various housing programs.

Actions planned to reduce the number of poverty-level families

Columbus's strategy to combat poverty centers on elevating the economic status of low-income households, ensuring they surpass the poverty threshold. Presently, educational and employment initiatives targeting poverty reduction are administered by entities like the Lower Chattahoochee Workforce Development Board, WorkSource Georgia, Columbus State University, Columbus Technical College, Goodwill, Better Work, and local nonprofit organizations.

In a collaborative effort with community stakeholders, the City secured a Vice President of Poverty Reduction with the United Way of the Chattahoochee Valley. This individual will cultivate strategic partnerships across the region and craft a ten-year actionable plan to reduce poverty in Columbus and the broader Chattahoochee Valley area, incorporating input from various stakeholders. Spearheading this endeavor is the Chattahoochee Valley Poverty Reduction Coalition, which secured \$1 million in start-up funding from American Rescue Plan to sustain the position and its associated initiatives for an initial three-year period, while concurrently establishing permanent funding streams.

Economic development strategies at both municipal and regional levels are intricately linked to poverty alleviation and workforce enhancement. The River Valley Regional Commission Comprehensive Economic Development Strategy, updated in 2022, prioritizes equipping the local workforce with the requisite knowledge, skills, and competencies for 21st-century employment. Key objectives under this mandate involve maintaining dialogue with local employers to ensure workforce training programs align with industry needs, facilitating educational initiatives within the local school systems, aiding military-to-civilian job transitions, and promoting apprenticeships and internships for youth.

Similarly, the Columbus 2025 plan, part of the Regional Prosperity Initiative, underscores the importance of nurturing a skilled and educated workforce to bolster regional competitiveness. Objectives within this

framework encompass establishing a comprehensive cradle-to-career partnership to synchronize education, training, business, and social services, expanding access to high-quality early childhood education and family support services, fostering awareness of educational and career pathways from an early age, enhancing mentoring programs for at-risk K-12 students, launching adult education campaigns, forging collaborations between businesses and educational institutions to tailor programs to target industry needs, and developing retention programs for military personnel transitioning out of service.

Moreover, several nonprofit organizations within Columbus provide emergency assistance to individuals in need. These multifaceted efforts highlight the city's commitment to tackling poverty through a holistic approach, combining educational, employment, and social support initiatives to uplift vulnerable communities and foster inclusive economic growth.

Actions planned to develop institutional structure

In August 2023, the Community Reinvestment Department held a mandatory training for all CDBG Public Service sub-recipients. The training covered the department's new CDBG-PS policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, and monitoring. The department has also updated its HOME policies and internal financial management and procurement policies. The department will intensify its sub-recipient monitoring in PY 24, including on-site monitoring for the highest risk sub-recipients. Finally, starting in PY 24, the department will implement its "first in, first ready, first out" process for CDBG Public Facilities. Using this process, the department will accept public facilities applications on a rolling basis. Currently, many projects are facing significant material and construction delays, which makes it difficult to select and implement CDBG-PF projects within the Action Plan year. The alternative process will allow us to plan for construction projects over longer and more realistic timeframes.

In the 2023 program year, the City worked within existing partners and coalitions, such as the Continuum of Care, to meet homeless service needs. In addition, the Community Reinvestment Department held mandatory training for all potential CDBG Public Facilities sub-recipients. The training covered the department's new CDBG-PF policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, procurement, Davis-Bacon and monitoring. In the 2024 program year, The Community Reinvestment Department will work closely with state and local agencies, nonprofit organizations, and other service providers to coordinate delivery of services to city residents. Columbus Consolidated Government will also continue to consult with various housing, homelessness, social service, elderly and disability resource agencies to gather data and identify service gaps and utilize ESG funding for eligible services. In addition, the Community Reinvestment Department will hold a mandatory training for all potential HOME nonprofit and For-profit developers, as well as those administering our Sweet Home Columbus down payment program, to bring rigidity and specificity to affordable housing development. The training will cover the department's new HOME Affordable Housing

Development and Accessibility policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, contractor procurement, BABA, and monitoring.

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

The City of Columbus will maintain its active involvement in the Columbus–Muscogee Continuum of Care, a collaborative initiative uniting nonprofit, governmental, and business leaders in a collective effort to address homelessness. This partnership encompasses a diverse membership, including providers of emergency, transitional, and permanent housing, alongside nonprofit social service organizations and government agencies.

Furthermore, the city hosts an annual affordable housing workshop designed to convene stakeholders with a vested interest in enhancing housing accessibility for populations earning below 80% of the area median income. The workshop serves as a platform for fostering dialogue and collaboration among participants, aiming to bolster both the availability and accessibility of affordable housing options. Additionally, it aims to facilitate the provision of comprehensive support services tailored to the needs of low-income households.

Program Specific Requirements

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

Introduction:

This section describes program specific requirements for CDBG, HOME, and ESG funds. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income over the 2024 Program Year period is 70.00%.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income	\$0

Other CDBG Requirements

1. The amount of urgent need activities	\$0
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2a. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit – A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.	70%
2b. Specify the years covered that include this Annual Action Plan.	2024 Program Year

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(i)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Other forms of investment being used in the HOME Program include Low Income Housing Tax Credit (LIHTC) and funding appropriated through the American Rescue Plan act of 2021. No other forms of investment are contemplated for the use in the HOME Program beyond those identified in 92.205. outside of those listed above.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City’s Home Program Resale/Recapture Provisions are included in the Grantee Unique Appendices attached to this plan document.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City’s Home Program Resale/Recapture Provisions are included in the Grantee Unique Appendices attached to this plan document.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not have any plans to refinance existing debt secured by multifamily housing and therefore does not have any refinancing guidelines for that activity.

Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

- 1. Include written standards for providing ESG assistance (may include as attachment) the City of Columbus will focus on the two eligible populations that can be assisted with funds: persons at risk of becoming homeless and persons who are literally homeless. While these are the targeted populations, it is important to give assistance to eligible participants who are in the most need of funds.**

Eligibility for Assistance

Each individual or family who is receiving assistance must first meet with case manager or intake personnel who can determine the appropriate type of assistance to meet their needs. The household must be at or below 30% of Area Median Income (AMI). Assets are counted for determining AMI eligibility. AMI is prospective and only counts income generated at that particular time. The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing

Homelessness Prevention Assistance

Although there are minimum requirements, HUD encourages grantees and subrecipients to target prevention assistance to individuals and families at the greatest risk of becoming homeless. The target population for the City will have the following risk factors:

- Sudden and significant loss of income
- Eviction within two weeks from a private dwelling
- Severe house cost burden (greater than 50% of income for housing costs)
- Pending rental housing foreclosure
- Credit problems that preclude obtaining housing

Rapid Re-Housing Assistance

Rapid re-housing assistance is available for persons who are homeless according to HUD's definition of homeless. The target population for the City's rapid re- housing program will have the following risk factors:

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;

- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs)
- Is exiting an institution where an individual has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

The purpose of these funds is to assist eligible program participants to move into permanent housing and achieve housing stability. Therefore, the City's subrecipients providing assistance will utilize a process to assess the level of service needed for all potential program participants, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG.

Coordination

The City will coordinate with the Continuum of Care (CoC) by attending and participating in the bi-monthly Continuum of Care meetings and monthly steering committee for the CoC. The Continuum includes several emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, mainstream service, and housing providers. In addition to bi-monthly meetings, there are several committees that also meet on a monthly basis to coordinate and establish policies. These committees include the Emergency Action Team and the Emergency Housing Team meetings.

Determining and Prioritizing Eligibility

The City and its providers within the Continuum recognize that individuals and households must be prioritized to ensure that funding is distributed to best serve the needs of those who are homeless or at-risk of becoming homeless.

Subrecipients will perform intake and evaluate each individual and household on a case-by-case basis. They recognize that each case is different, and that the demographics throughout the City are so different so as to not be able approach potential clients with a "one size fits all strategy." To best prioritize those who are homeless or at risk of becoming homeless for rapid re-housing or homeless prevention funds, those who are at-risk of becoming homeless will need to show that they will become homeless if they do not receive ESG Homeless Prevention funds, and they must have also suffered an economic hardship to become at risk of losing their home.

Subrecipients may choose to prioritize homeless individuals and households who have been involved with their particular program for Rapid Re-housing assistance, although each individual and household will be evaluated before being able to receive funding.

In addition to the household income being below 30% AMI and the household currently experiencing homelessness or being at imminent risk of becoming homeless, there must be documented evidence in the client files that determine:

- There is a lack of financial resources.
- There are no other housing options.
- There are no support networks.

Client share of rent and utilities costs

When a provider determines that a household is a priority for either Homeless Prevention or Rapid Re-housing rental assistance, they will be eligible to receive up to 100% rental assistance for no more than the full amount of the rent, as stated on the lease.

Short Term and Medium-Term Rental Assistance Duration

The City will require short-term and medium-term rental assistance to allow individuals and families to remain in their existing rental units or to help them obtain and remain in rental units they select. A lease must be in place in the program participants name for them to receive assistance.

Short-term rental assistance can only be used for three (3) months while medium-term rental assistance ranges from four (4) to 24 months. No program participant may receive more than 24 months of assistance under ESG, and each program participant must be evaluated every three (3) months to determine the amount of assistance needed.

Rental assistance may also be used to pay up to six (6) months of rental arrears for eligible program participants; however, the six (6) months count towards the 24 month total. The rental assistance paid cannot exceed the actual rental cost, which must be in Compliance with HUD's standard of "rent reasonableness." This means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program. Cost types are the categories of eligible HPRP financial assistance: rent from the client portion or the subsidy; security deposits, utility deposits, utility payments, moving cost assistance, and hotel/motel vouchers.

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

United Way Home for Good Continuum of Care has not formally developed a coordinated assessment system; however, the City – in conjunction with the Balance of State CoC – and the Georgia Department of Community Affairs are utilizing the same ESG forms as a first step towards developing an outreach and intake system.

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

The City of Columbus Community Reinvestment Department publishes a notification of funding availability in the Ledger Enquirer, the local newspaper, to announce the availability of program funds. Application notices are also emailed to the Community Reinvestment Department's wide network of stakeholders and posted on the Community Reinvestment Department's website for organizations to download and apply for funding. These applications are then reviewed by an application rating committee for conformance with the program requirements, qualifications of applicants, availability of matching funds, and other factors. The applications committee makes recommendations to the Columbus City Council for final approval of funding allocations.

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

The City of Columbus Community Reinvestment Department requires subrecipient organizations to include homeless or formerly homeless individuals or other equivalent policymaking entity. Non-profit organizations recommended for PY2024 funding have procedures in place for homeless or formerly homeless persons to be involved with the program design and implementation.

5. Describe performance standards for evaluating ESG.

Performance standards provide a measure for the City to evaluate the effectiveness of each ESG service provider in the areas of: (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and, (d) Reducing clients' housing barriers or housing stability risks. A complete listing of ESG written standards can be found attached as an appendix.

The City of Columbus will evaluate each ESG service provider’s performance based on the following standards:

1. Subrecipients will develop and adhere to priorities for service delivery by need.
2. Subrecipients will assist clients in rapid movement to permanent housing from shelters or from the street.
3. Subrecipients will ensure that clients have easy access to services
4. Subrecipients will provide comprehensive case management to address a spectrum of needs for each client.

Appendix A:

Participation Record

Appendix B:

SF-424s and Certifications

Appendix C:

HOME Program Resale/Recapture Provisions

Appendix D:

ESG Program Policies and Procedures

Appendix A:

Participation Record

Public Comments

The City of Columbus conducts a variety of public outreach activities to garner input from city staff, government agencies, non-profit agencies, affordable housing developers, local service providers, and Columbus residents in planning its CDBG and HOME programs throughout the program year. During the preparation of this Annual Action Plan, the City held a formal public hearing to gather input from interested stakeholders. Public comments on the draft Annual Action Plan were also solicited throughout a 30-day public comment period from March 22, 2024, to April 22, 2024, and August 28, 2024, to September 27, 2024.

The City did not receive any comments relevant to the 2024-2025 Annual Action Plan during the Public Comment Period or at the Public Hearing held on April 4, 2023, and September 11, 2024.



The Beaufort Gazette
 The Belleville News-Democrat
 Bellingham Herald
 Centre Daily Times
 Sun Herald
 Idaho Statesman
 Bradenton Herald
 The Charlotte Observer
 The State
 Ledger-Enquirer

Durham | The Herald-Sun
 Fort Worth Star-Telegram
 The Fresno Bee
 The Island Packet
 The Kansas City Star
 Lexington Herald-Leader
 The Telegraph - Macon
 Merced Sun-Star
 Miami Herald
 El Nuevo Herald

The Modesto Bee
 The Sun News - Myrtle Beach
 Raleigh News & Observer
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Attention: COLS CONS GOVT/ COMM RE-INVEST

COLS CONS GOVT/ COMM RE-INVESTMENT
 COMMUNITY REINVESTMENT DEPT
 PO BOX 1340, 420 10TH ST.
 COLUMBUS, GA 31902
 SCOTT.ROBERT@COLUMBUSGA.ORG

**CITY OF COLUMBUS
 PUBLIC NOTICE OF
 COMMUNITY MEETING
 FOR THE CITY'S
 PY2024/FY2024
 ANNUAL ACTION PLAN**

The City of Columbus is currently developing its PY2024/FY2025 Annual Action Plan (AAP). The Annual Action Plan will identify community development and affordable housing needs and set priorities for investment of federal grant funds to address them in the 2024 program year. The AAP is required by the U.S. Department of Housing and Urban Development (HUD) for the city to receive federal money through the Community Development Block Grant (CDBG) and the Home Investment Partnership (HOME) programs. The Community Reinvestment Department will share the opportunity to apply for funding from CDBG and HOME programs.

Members of the public are invited to participate in the first AAP public meeting on **Monday, January 8th, 2024, at 5:30 PM, located at the Columbus Public Library, Synovus Room.**

A draft of the Annual Action Plan will be posted on the Community Reinvestment website for public comment beginning in March 2024.

If you have any questions, please contact Emma Kimbrel, Community Reinvestment Planner, prior to the meeting at 706-225-3931 or Kimbrel.Emma@ColumbusGA.org.

The building is handicapped accessible. Persons requiring special accommodations can make arrangements by contacting the Community Reinvestment Department, 420 Tenth Street, Columbus, GA 31901 (phone 706 653 4613). The City TDD number is 1 800 225 0056.

¿ Se habla Español? Una versión en español de los recursos de la reunión estará disponible a pedido.

IPL0152450
 Dec 29 2023

To whom it may concern:

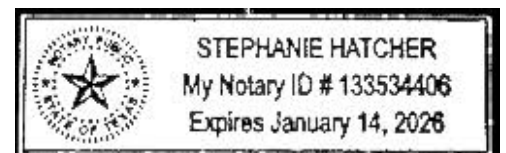
This is to certify the legal advertisement in the above stated case has been published in the Columbus Ledger-Enquirer, legal organ of Muscogee County on

1 insertion(s) published on:
 12/29/23

Sworn to and subscribed before me this 2nd day of January in the year of 2024

Stephanie Hatcher

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
 Legal document please do not destroy!

PUBLIC MEETING

Jan. 8, 2024 | 5:30 PM | Synovus Room, Columbus Public Library |

The City of Columbus is currently developing it's PY2024/FY2025 Annual Action Plan (AAP). The AAP Will identify community development and affordable housing needs and set priorities for the investment of the federal grant funds to address them in the 2024 program year.

Have Questions? Let's Chat!

(706)-225-4613 or email Kimbrel.Emma@ColumbusGA.org

COMMUNITY
REINVESTMENT
COLUMBUS CONSOLIDATED GOVERNMENT



The building is handicapped accessible. Need special accommodations to attend? Contact Emma Kimbrel at 706-225-3931. The City TDD number is 1-800-225-0056.

A Spanish version of meeting resources will be available upon request.



CCG Community Reinvestment

Published by Emma Kimbrel

8 December 2023

Mark your calendars!! We are a month out from our first Annual Action Plan Public Meeting.

Community Reinvestment is currently developing our City Fiscal Year 2025 Annual Action Plan. The AAP will identify community development and affordable housing needs in order to set priorities for the federal grant funds we receive. This is a time for our department to hear from our community as well as for our community to hear from us about the upcoming opportunities to apply for funding from our CDBG and HOME programs.

We hope to see you there! See less

Edit

2

1



Most relevant

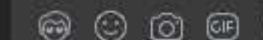


Rob Scott
Brookie Tate

38w Like Reply Hide



Comment as CCG Community Reinvest...





COMMUNITY
REINVESTMENT
COLUMBUS CONSOLIDATED GOVERNMENT

AAP Public Meeting - January 8, 2024

SIGN IN SHEET

Name	Organization	Email
James Hutchins		James Hutchins 095@gmail.com
Veronica Marshall		vdmarsh2@gmail.com
Cathy Robinson	Safehouse	cathy@safehouse-ministries.com
Laurie + Eldon Bennett	Personal	lauriekaybennett@gmail.com
Eldon Bennett	Personal	erbenn1@gmail.com
Tammie Johnson		tammiewjohnson@yahoo.com
David Pringle	Wynnton Neighborhood Housing	pdcmanafcl@aol.com
Lynal Ezzell	" " "	ezzellrealtor@belbairth.net
Suzanne Scapple	" " "	scapple.suzanne@gmail.com
Liz Dillard Grimes	Southwest Georgia Housing Opportunities	liz@swgaho.org
Cathy Williams	NeighborWorks CoS	cwilliams@nwcolumbus.org
Kimberly Hinton Poole	NeighborWorks CoS.	kpoole@nwcolumbus.org

Name	Organization	Email
Reggie Lewis	Cure Violence / TS4S	reggie4lewis@gmail.com
Cherice Hill	Cure Violence / Hill-Whitson Peoples	HillWhitson@CVA.org
Ternika Barnes	United Way / Home for Good	tbarnes@unitedcv.org
Nadine Richardson	Safebase / Must	knadrichardson@gmail.com
Demetrius deBride	Urban League of the River Valley / Young Professionals	
Babbs Douglas	Direct Services	BabbsDouglas@directservices.org
Laketha Ashe	CGR	laketha.ashe@gmail.com
M + L. Brynston	Business Architects	info@thebusinessarchitects.com
Malinda Shamburger	Chattahoochee Valley Episcopal Ministry	director@cvepministry.org
Jamilia Smith	Key Foundation	jamiliasmith14@yahoo.com
Marvin Broadwater Sr.	Omega Psi Phi	mbroadwatersr@yahoo.com
Jamie Thomas	Enrichment Semes	jthomas@esprca.org



Name	Organization	Email
Susan Gallagher	New Horizons BH	sgallagher@nhbh.org
Bruce Huff	CITY Council	BHUFF@COLUMBUSGA.ORG
Alicia Taylor	Visionary Homes	keeshan.taylor@gmail.com
Dante Dowdell	Visionary Homes	visionaryhomesandinvestmentgroup.com





The Beaufort Gazette
 The Belleville News-Democrat
 Bellingham Herald
 Centre Daily Times
 Sun Herald
 Idaho Statesman
 Bradenton Herald
 The Charlotte Observer
 The State
 Ledger-Enquirer

Durham | The Herald-Sun
 Fort Worth Star-Telegram
 The Fresno Bee
 The Island Packet
 The Kansas City Star
 Lexington Herald-Leader
 The Telegraph - Macon
 Merced Sun-Star
 Miami Herald
 El Nuevo Herald

The Modesto Bee
 The Sun News - Myrtle Beach
 Raleigh News & Observer
 Rock Hill | The Herald
 The Sacramento Bee
 San Luis Obispo Tribune
 Tacoma | The News Tribune
 Tri-City Herald
 The Wichita Eagle
 The Olympian

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
15798	529790	HUD PROGRAM YEAR 2024 / CITY FISCAL YEAR 2025	HUD PROGRAM YEAR 202	\$290.00	3	10.18 in

Attention: Emma Kimbrel

COLS CONS GOVT/ COMM RE-INVESTMENT
 COMMUNITY REEINVESTMENT DEPT
 PO BOX 1340, 420 10TH ST.
 COLUMBUS, GA 31902
 SCOTT.ROBERT@COLUMBUSGA.ORG

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To whom it may concern:

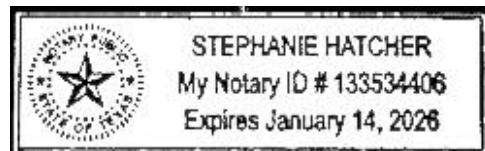
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1 insertion(s) published on:
 03/15/24

Sworn to and subscribed before me this 21th day of March in the year of 2024

Stephanie Hatcher

Notary Public in and for the state of Texas, residing in Dallas County



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**COLUMBUS CONSOLIDATED GOVERNMENT
PUBLIC NOTICE OF COMMUNITY MEETING
HUD PROGRAM YEAR 2024 /
CITY FISCAL YEAR 2025**

The Columbus Consolidated Government is currently developing its HUD Program Year 2024 Annual Action Plan (AAP). The Annual Action Plan will identify community development and affordable housing needs and set priorities for investment of federal grant funds to address them in City Fiscal Year 2025. The AAP is required by the U.S. Department of Housing and Urban Development (HUD) for the City to receive federal money through the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). For City FY25, the City of Columbus expects to be funded the approximated HUD grant amounts:

Community Development Block Grant (CDBG): \$1,660,399.00
HOME Investment Partnerships (HOME): 1,071,257.00

Members of the public are invited to participate in a public hearing on Tuesday, April 2, 2024, at 5:30PM at the Columbus Public Library located at 3000 Macon Road, Columbus, GA 31906 in the Betty Van Cleave Meeting Room.

A draft of the Annual Action Plan will be available for public comments beginning Friday, March 22, 2024, at the following locations:

- Online at <https://www.columbusga.gov/communityreinvestment/Planning/Annual-Action-Plan>
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library

During the 30-day public display and comment period, written comments will be accepted via email at Kimberl.Emma@ColumbusGA.org or by mail to Community Reinvestment Department, Attn: Emma Kimbrel, 420 10th Street, Columbus GA 31901. The city will consider any comments or views of city residents received in writing, or orally at the public hearings, in preparing the final AAP.

The Annual Action Plan will be considered for approval by City Council on April 23, 2024. If approved, the AAP will be submitted to HUD on or before May 15, 2024.

Other Information

The Columbus Public Library is handicapped accessible. Persons requiring special accommodations can make arrangements by contacting the Community Reinvestment Department, 420 Tenth Street, Columbus, GA 31901 (Phone: 706-225-3931). The City TDD number is 1-800-225-0056.



Home

HOME Program ▾

CDBG Program ▾

ARP ▾

Planning ▾

Contact

Resources

Real Estate ▾

Land Bank Authority ▾

[FY2025 Annual Action Plan](#)

The City of Columbus's PY24/FY25 Annual Action Plan Draft is now ready for review. We invite you to share your valuable feedback during the comment period, which runs from March 22 to April 22, 2024.

Please direct any comments or inquiries to our Planner, Emma Kimbrel, at Kimbrel.Emma@ColumbusGA.org. We look forward to hearing from you!

¿ Se habla Español? Una versión en español de los recursos de la reunión estará disponible a pedido.

Community Reinvestment Department

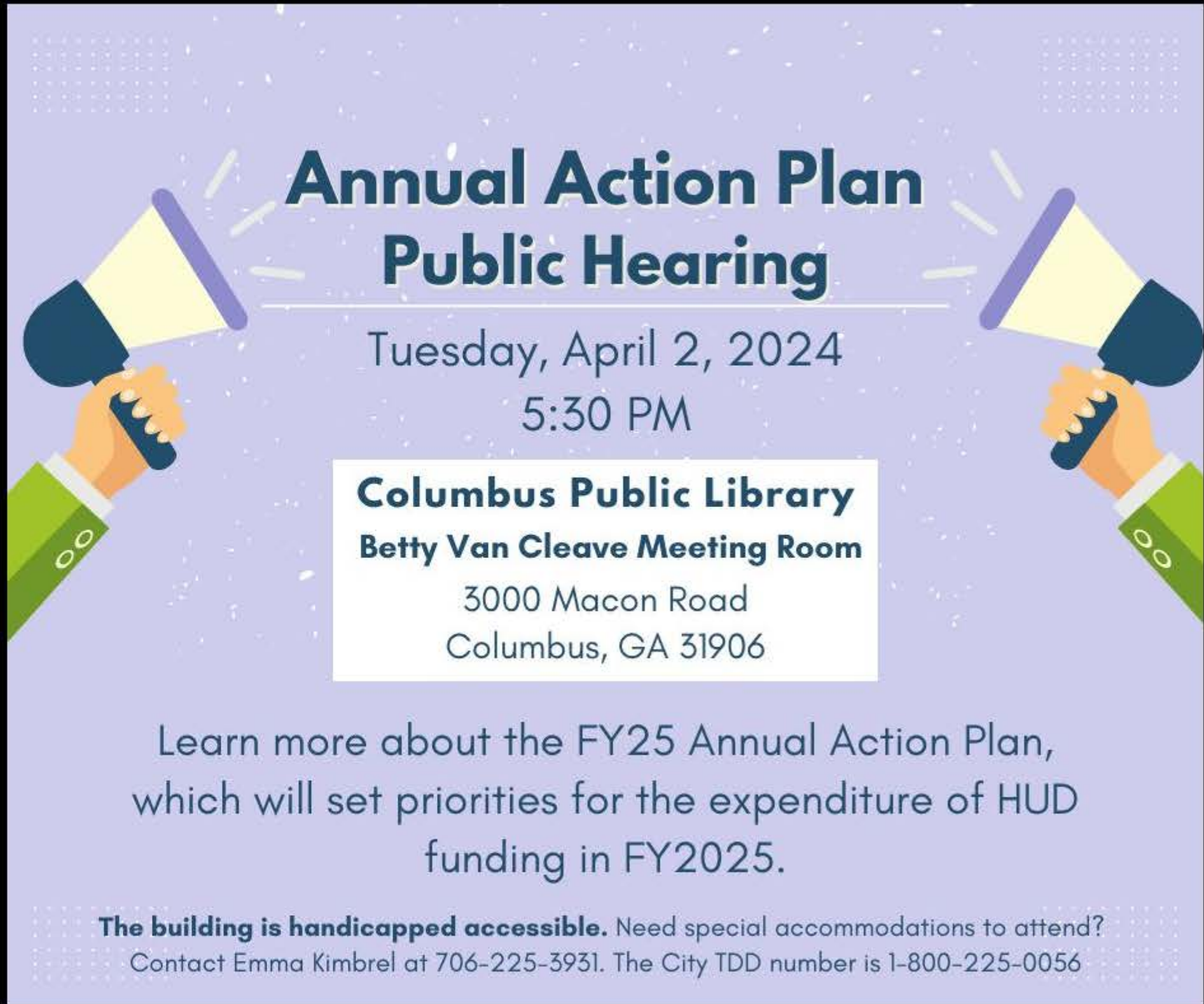
Mission

Branding our organization to be a center of excellence with respect and integrity to serve the community in a capacity where the hard work that we put in translates into outcomes that are pragmatic and oriented to succeed.

Vision

My vision for the future is centered around excellence and striving to change the status quo as this community is transitioning to become a high performing community.



Annual Action Plan Public Hearing

Tuesday, April 2, 2024
5:30 PM

Columbus Public Library
Betty Van Cleave Meeting Room
3000 Macon Road
Columbus, GA 31906

Learn more about the FY25 Annual Action Plan, which will set priorities for the expenditure of HUD funding in FY2025.

The building is handicapped accessible. Need special accommodations to attend? Contact Emma Kimbrel at 706-225-3931. The City TDD number is 1-800-225-0056

 **CCG Community Reinvestment**
Published by Rob Scott

· 20 March ·

The Community Reinvestment Department will be hosting a Public Hearing to discuss our vision of how we plan to implement this year's allocation of HUD Entitlement Funds.

Please join us to learn about how we are poised to grow and where we intend to go!

Save the Date!

Edit

2

3



 Comment as CCG Community Reinvestes...





AAP Public Meeting - April 2, 2024

SIGN IN SHEET

Name	Organization	Email
Ben MacMunn	STARTUP COLUMBUS, INC.	BEN@STARTUPCOLUMBUS.COM
Tabetha Getz	COLUMBUS 2025	Tabetha@columbus2025.com
Jamie Thomas	Enrichment Services	jthomas@esplca.org
Naren Butts		nbutts3815@aol.com
Deborah J. Mitchell	-	mitchdzdeb@comcast.net



The Beaufort Gazette
 The Belleville News-Democrat
 Bellingham Herald
 Centre Daily Times
 Sun Herald
 Idaho Statesman
 Bradenton Herald
 The Charlotte Observer
 The State
 Ledger-Enquirer

Durham | The Herald-Sun
 Fort Worth Star-Telegram
 The Fresno Bee
 The Island Packet
 The Kansas City Star
 Lexington Herald-Leader
 The Telegraph - Macon
 Merced Sun-Star
 Miami Herald
 El Nuevo Herald

The Modesto Bee
 The Sun News - Myrtle Beach
 Raleigh News & Observer
 Rock Hill | The Herald
 The Sacramento Bee
 San Luis Obispo Tribune
 Tacoma | The News Tribune
 Tri-City Herald
 The Wichita Eagle
 The Olympian

AFFIDAVIT OF PUBLICATION

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15798	584328	REVISED 5-YEAR CONSOLIDATED PLAN	REVISED 5-YEAR CONSOL	\$290.00	3	10.18 in

Attention: Emma Kimbrel

COLS CONS GOVT/ COMM RE-INVESTMENT
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 PO BOX 1340, 420 10TH ST.
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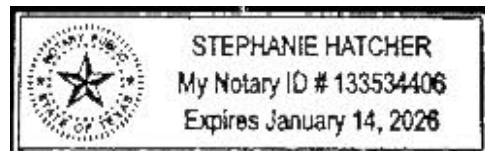
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1 insertion(s) published on:
 08/21/24

Sworn to and subscribed before me this 26th day of August in the year of 2024

Stephanie Hatcher

Notary Public in and for the state of Texas, residing in Dallas County



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**COLUMBUS CONSOLIDATED GOVERNMENT
PUBLIC NOTICE
PUBLIC HEARING AND REVIEW PERIOD FOR THE REVISED 5-YEAR
CONSOLIDATED PLAN, HUD PROGRAM YEAR 2024
ANNUAL ACTION PLAN, AND CITIZEN PARTICIPATION PLAN**

The Columbus Consolidated Government has revised its 5-year Consolidated Plan, HUD Program Year 2024 Annual Action Plan (AAP) and Citizen Participation Plan. The Consolidated Plan and Annual Action Plan are required by the U.S. Department of Housing and Urban Development (HUD) for the City to receive federal allocations through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG).

Revisions to the Consolidated Plan and Action Plan include (1) analysis, goals, projects, and activities related to the Emergency Solutions Grant (ESG), and (2) relocation activities. Revisions to the Citizen Participation Plan include "addition of new grants" to the substantial amendment considerations for Consolidated Plans.

The Emergency Solutions Grant program provides funding to engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families; and prevent families and individuals from becoming homeless.

For City FY25, the City of Columbus expects to be funded the approximated HUD grant amounts:

Community Development Block Grant (CDBG): \$1,701,528.00
HOME Investment Partnerships (HOME): \$914,882.28
Emergency Solutions Grant (ESG): \$145,892.00

Members of the public are invited to participate in a public hearing on Tuesday, September 11, 2024, at 5:30PM at the Columbus Public Library located at 3000 Macon Road, Columbus, GA 31906 in the Synowus A&B Meeting Rooms.

Drafts of the revised Consolidated Plan, Annual Action Plan and Citizen Participation Plan will be available for public comments beginning Wednesday, August 28, 2024, at the following locations:

- Online at <https://www.columbusga.gov/communityreinvestment/Planning/Consolidated-Plan>
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 540 Veterans Parkway, Mildred L. Tany Public Library
- 5669 Armour Road, North Columbus Public Library
- 1878 Torch Hill Road, Our Lady of Lourdes Church (temporary campus of the South Columbus Library)

During the 30-day public display and comment period, written comments will be accepted via email at Kimberl.Emms@ColumbusGA.org or by mail to Community Reinvestment Department, Attn: Emma Kinbrel, 420 10th Street, Columbus GA 31901. The city will consider any comments or views of city residents received in writing, or orally at the public hearings, in preparing the final Consolidated Plan, Annual Action Plan and Citizen Participation Plan.

The revised Consolidated Plan, Annual Action Plan and Citizen Participation Plan will be considered for approval by City Council on September 24, 2024. If approved, these plans will be submitted to HUD on September 27, 2024.

Other Information

The Columbus Public Library is handicapped accessible. Persons requiring special accommodations can make arrangements by contacting the Community Reinvestment Department, 420 10th Street, Columbus, GA 31901 (Phone: 706-225-8931). The City TDD number is 1-800-225-0058.

**COLUMBUS CONSOLIDATED GOVERNMENT
PUBLIC NOTICE
PUBLIC HEARING AND REVIEW PERIOD FOR THE REVISED 5-YEAR
CONSOLIDATED PLAN, HUD PROGRAM YEAR 2024
ANNUAL ACTION PLAN, AND CITIZEN PARTICIPATION PLAN**

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For City FY25, the City of Columbus expects to be funded the approximated HUD grant amounts:

Community Development Block Grant (CDBG): \$1,701,526.00

HOME Investment Partnerships (HOME): \$914,862.28

Emergency Solutions Grant (ESG): \$145,932.00

Members of the public are invited to participate in a public hearing on Tuesday, September 11, 2024, at 5:30PM at the Columbus Public Library located at 3000 Macon Road, Columbus, GA 31906 in the Synovus A&B Meeting Rooms.

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The revised Consolidated Plan, Annual Action Plan and Citizen Participation Plan will be considered for approval by City Council on September 24, 2024. If approved, these plans will be submitted to HUD on September 27, 2024.

Other Information

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COMMUNITY
REINVESTMENT
COLUMBUS CONSOLIDATED GOVERNMENT



Annual Action Plan Public Hearing

Wednesday, September 11, 2024
5:30 PM

Columbus Public Library

Synovus Room A&B
3000 Macon Road
Columbus, GA 31906

Learn more about the FY25 Annual Action Plan,
Amended Consolidated Plan, and Amended Citizen
Participation Plan.

The building is handicapped accessible. Need special accommodations to attend?
Contact Emma Kimbrel at 706-225-3931. The City TDD number is 1-800-225-0056



CCG Community Reinvestment

Published by Natalie Bouyett

4 September at 07:00 · 🌐

The City of Columbus has received \$145,932 in
Emergency Solutions Grant funding!

To account for the grant, the Community
Reinvestment Department has amended the 5-
year Consolidated Plan and the Citizens
Participation Plan so funding could be included
in the FY2025 Annual Action Plan. Join us at our
Public Meeting on September 11, 2024, 5:30PM,
at the Columbus Public library!

All three plan drafts are now ready for review. We
invite you to share your valuable feedback during
the comment period, which runs from August 28
to September 27, 2024.

You can review the plans at our website:
columbusga.gov/communityreinvestment See
less

Edit

Boost post

👍❤️ 8

6 🗨️



Comment as CCG Community Reinvest...





Announcement

The City of Columbus has received \$145,932 in Emergency Solutions Grant funding. In order to account for the grant, the Community Reinvestment Department has amended the 5-year Consolidated Plan and the Citizens Participation Plan so that funding could be included in the FY2025 Annual Action Plan.

All three plan drafts are now ready for review. We invite you to share your valuable feedback during the comment period, which runs from August 28 to September 27, 2024.

Please direct any comments or inquiries to our Planner, Emma Kimbrel, at Kimbrel.Emma@ColumbusGA.org. We look forward to hearing from you!

¿Hablas español? Una versión en español de los recursos estará disponible a pedido.

Document Links:

- [Consolidated Plan Draft](#)
- [Citizen Participation Plan Draft](#)
- [2025 Columbus AAP Draft](#)



AAP/CP/CPD Public Meeting

September 11, 2024

SIGN IN SHEET

Name	Organization	Email
PAT FOLEY	UW	PFOLEY@UNIVERSITYOFMICHIGAN.EDU
Denise Cambridge	Community Member	DMC@CAMBRIDGE@LIVE.COM
Denise Ellis	Community Member	duan23ellis@gmail.com

Appendix B:

SF-424s and Certifications

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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

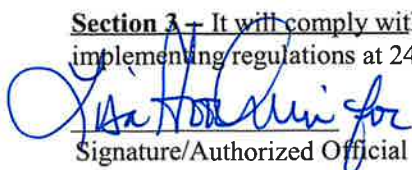
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.


Signature/Authorized Official

9/25/21
Date

City Manager _____
Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) _____ , _____ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

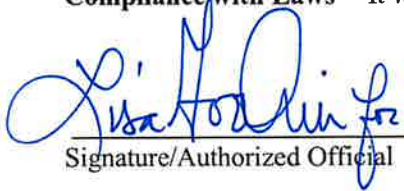
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.


Signature/Authorized Official

9/25/24
Date

City Manager

Title

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature/Authorized Official

9/25/24
Date

City Manager

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature/Authorized Official

9/24/24
Date

City Manager
Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.


Signature/Authorized Official

9/25/24
Date

City Manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. 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.

ASSURANCES - CONSTRUCTION PROGRAMS

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

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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.
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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."
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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
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
Columbus Consolidated Government	9/25/24

ASSURANCES - CONSTRUCTION PROGRAMS

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

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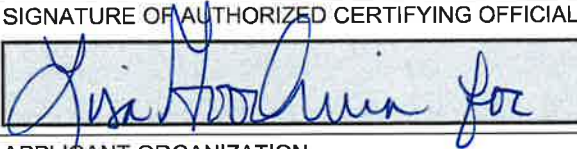
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
Columbus Consolidated Government	9/25/21

ASSURANCES - CONSTRUCTION PROGRAMS

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
Columbus Consolidated Government	9/25/24

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> 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: Columbus Consolidated Government		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 58-1097948	* c. UEI: T3JDUZKTHC13	
d. Address:		
* Street1: 420 10th Street	_____	
Street2:	_____	
* City: Columbus	_____	
County/Parish:	_____	
* State: GA: Georgia	_____	
Province:	_____	
* Country: USA: UNITED STATES	_____	
* Zip / Postal Code: 31901-2844	_____	
e. Organizational Unit:		
Department Name: Community Reinvestment	Division Name: _____	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: _____	* First Name: Robert	
Middle Name: _____	_____	
* Last Name: Scott	_____	
Suffix: _____	_____	
Title: Director		
Organizational Affiliation: _____		
* Telephone Number: 706-225-4613	Fax Number: _____	
* Email: scott.robert@columbusga.org		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG)

*** 12. Funding Opportunity Number:**

B-24-MC-13-0004

* Title:

Community Development Block Grant (CDBG)

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:**

FFY24/FY25 Community Development Block Grant Program

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="1,701,526.00"/>
* 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="1,701,526.00"/>

*** 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:

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> 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: <u>Columbus Consolidated Government</u>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <u>58-1097948</u>	* c. UEI: <u>T3JDUZKTHC13</u>	
d. Address:		
* Street1: <u>420 10th Street</u>	Street2: _____	
* City: <u>Columbus</u>	County/Parish: _____	
* State: <u>GA: Georgia</u>	Province: _____	
* Country: <u>USA: UNITED STATES</u>	* Zip / Postal Code: <u>31901-2844</u>	
e. Organizational Unit:		
Department Name: <u>Community Reinvestment</u>	Division Name: _____	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: _____	* First Name: <u>Robert</u>	
Middle Name: _____	* Last Name: <u>Scott</u>	
Suffix: _____	Title: <u>Director</u>	
Organizational Affiliation: _____		
* Telephone Number: <u>706-225-4613</u>	Fax Number: _____	
* Email: <u>scott.robert@columbusga.org</u>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Home Investment Partnership Program (HOME)

*** 12. Funding Opportunity Number:**

M-24-MC-13-0207

* Title:

Home Investment Partnership Program (HOME)

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:**

FFY24/FY25 HOME Investment Partnership Program

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="914,862.28"/>
* 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="914,862.28"/>

*** 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
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Application for Federal Assistance SF-424		
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State Use Only:		
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8. APPLICANT INFORMATION:		
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Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Emergency Solutions Grant (ESG)

*** 12. Funding Opportunity Number:**

E-24-MC-3-0008

* Title:

Emergency Solutions Grant (ESG)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

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*** 15. Descriptive Title of Applicant's Project:**

FFY24/FY25 Emergency Solutions Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

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* 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="145,932.00"/>
* 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="145,932.00"/>

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Suffix:

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* Signature of Authorized Representative: 

* Date Signed:

Appendix C:

HOME Program Resale/Recapture Provisions

CITY OF COLUMBUS, GEORGIA

HOME PROGRAM RESALE/RECAPTURE PROVISIONS

Revised 8/1/2016

I. BACKGROUND

Section 215 of the HOME statute establishes specific requirements that all HOME-assisted homebuyer housing must meet in order to qualify as affordable housing. Specifically, all HOME-assisted homebuyer housing must have an initial purchase price that does not exceed 95 percent of the median purchase price for the area, be the principal residence of an owner whose family qualifies as low-income at the time of purchase, and be subject to either resale or recapture provisions. The HOME statute states that resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including any improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The HOME statute also specifies that recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. The Columbus, Georgia HOME Program utilizes the resale/recapture methods for HOME homebuyer programs in accordance with 24 CFR 92.254(a)(5). The City of Columbus will not provide development subsidies through its HOME program, so resale provisions will not be established.

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME PJs must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, *including projects funded with HOME program income*, the Columbus, Georgia HOME Program must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that the City submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the City will enforce the provisions.

II. DEFINITIONS

Development Subsidy – a development subsidy is defined as financial assistance provided by the City to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.

Direct Subsidy – a direct subsidy is defined as financial assistance provided by the City that reduces the purchase price for a homebuyer below market value or otherwise subsidizes the homebuyer [i.e. down-payment loan, purchase financing, assistance to CHDO to develop and sell unit below market, or closing cost assistance]. A direct subsidy triggers recapture.

Net Proceeds – the sales prices minus superior loan repayment (other than HOME funds) and any closing costs.

Homebuyer Investment – The homeowner’s down-payment and any capital improvement investment made by the owner since purchase.

III. PERIOD OF AFFORDABILITY

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing.

a. Period of Affordability Under Resale Provisions

The City of Columbus will not provide development subsidies through its HOME program, so resale provisions will not be established. Should the City change this policy, the resale/recapture provisions will be revised.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded *Direct Subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods.

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

IV. RECAPTURE PROVISIONS

The City's Recapture Provisions permit the original homebuyer to sell the property to any willing buyer, at any price the market will bear, during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

a. Applicability

Recapture Provisions are applicable to all City HOME funded homebuyer activities, as the City will provide direct subsidies only through its HOME program. Recapture Provisions are required to be used in cases involving a Direct Subsidy to a homebuyer.

b. Effect

If a homeowner chooses to sell during the Period of Affordability, the full amount of the HOME Program Direct Subsidy (less the Homebuyer Investment)) shall be recaptured and repaid to the City provided that net proceeds are sufficient. Recaptured funds shall be reinvested in other affordable housing for low to moderate income persons. If net proceeds are insufficient to repay the total HOME investment due, only a pro-rata share of the net proceeds, as set forth in the formulas below, will be recaptured. In the event that net proceeds are zero, the recapture provision still applies, but there are no funds to recapture.

c. Imposing Recapture Provisions

A clear, detailed written agreement, executed before or at the time of sale, ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If the City provides HOME funds to a subrecipient, developer or CHDO to develop and sell affordable housing, the City must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

The written agreement between the homebuyer and the City, as well as mortgage and lien documents are all used to impose the Recapture Provisions in HOME-assisted homebuyer projects under the recapture option. The purpose of these enforcement mechanisms is to ensure that the City recaptures the Direct Subsidy to the HOME-assisted homebuyer if the HOME-assisted property is transferred. Deed restrictions, covenants running with the land, or other similar mechanisms are required by the HOME rule to be used in homebuyer projects under the recapture option.

As provided in §92.254 (a)(5)(ii)(A), there are several options that the City may use that are acceptable to HUD to recapture funds and no option may capture more than the net proceeds, if any. The option that the City of Columbus has elected to use, in the event that the net proceeds are not sufficient to recapture the entire Direct HOME Subsidy amount, is the *shared net proceeds option in combination with a pro rata reduction over time*. The shared net proceeds formula will include

the sales price minus loan repayment (other than HOME funds), closing costs, and homebuyer investment made during the period of affordability.

If the net proceeds are insufficient to recapture the full HOME investment, only a pro-rata share of the net proceeds, as set forth in the formulas below, will be recaptured. If there are insufficient net proceeds available at sale to recapture the full pro rata amount due, the City is not required to repay the difference between the prorated direct HOME subsidy due and the amount the City is able to recapture from available net proceeds.

- To determine the pro rata amount recaptured by the City of Columbus:

$$\frac{\text{Number of Years Homebuyer Occupied Home}}{\text{Period of Affordability}} \times \text{Total Direct HOME Subsidy} = \text{Recapture Amount}$$

- To calculate the amount of net proceeds (or shared appreciation to be returned to the City of Columbus:

$$\frac{\text{Direct HOME Subsidy}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Recapture Amount}$$

- To calculate the amount of net proceeds (or shared appreciation) available to the homebuyer:

$$\frac{\text{Homebuyer Investment}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount to Homebuyer}$$

d. Foreclosure

Homebuyer housing with a Recapture Provision is not subject to the affordability requirements after the City has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, the City shall attempt to recoup any net proceeds that may be available through the foreclosure sale. The City is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, the City may only recapture the actual net proceeds, if any. Upon distribution of proceeds, all obligations for continued affordability are satisfied.

E. Enforcement

In the event of non-compliance by the homebuyer which includes failure: to maintain property as principal residence, pay taxes, assessments or insurance premiums, the City will consider this as a breach of covenant and the City may, at its option and without notice, declare the entire indebtedness due.

V. RESALE PROVISIONS

The City of Columbus will not provide development subsidies through its HOME program, so resale provisions will not be established. Should the City's policy change, the resale/recapture provisions will be revised.

VI. MONITORING RESALE & RECAPTURE PROVISIONS

For HOME-assisted homebuyer projects, the City shall require its CHDOs, developers and subrecipients, through written CHDO, Developer or Subrecipient agreements, to perform ongoing monitoring of the principal residency requirement during the period of affordability. Confirmation that the buyer is using the property as his or her principal residence may be accomplished by verifying that the buyer's name appears on utility company records or insurance company records for the home. In addition, postcard or letters mailed with "do not forward" instructions may demonstrate whether the buyer is receiving mail at the home.

Failure to comply with the resale or recapture requirements means that:

- 1) The original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or
- 2) The home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced.

In the case of foreclosure, the City reserves the right of first refusal on the property and will attempt to find an income eligible buyer to purchase the unit.

In cases of noncompliance under either resale or recapture provisions, the City must repay to its HOME Investment Trust Fund in accordance with §92.503(b), any *outstanding HOME funds* invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy to the developer plus any HOME down-payment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount.

Appendix D:

ESG Program Policies and Procedures

Emergency Solutions Grant (ESG)

PROGRAM POLICIES AND PROCEDURES MANUAL



Community Reinvestment
420 10th Street Columbus, GA 31901
706 225-4613

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PART 1 – Introduction

PURPOSE

The Emergency Solutions Grant (ESG) Program is authorized by Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. This legislation, codified at 42 U.S.C. 11371-11378, was designed to help prevent and address homelessness by providing federal grants to states, local governments, and other entities to fund homelessness prevention, emergency shelter, rapid re-housing, and street outreach programs. HUD’s regulations for the ESG Program are found in 24 CFR Part 576.

Community Reinvestment Department (CRD) receives ESG funding as a Participating Jurisdiction (PJ), and then makes awards to eligible entities who, in turn, disburse or administer the ESG funds to qualified households within many Columbus communities. All sub-recipients are required to utilize ESG Program funds in a manner consistent with all federal statutes and regulations, Community Reinvestment Department policies and procedures, and Consolidated Plan.

BACKGROUND ON ELIGIBLE ACTIVITIES (PROGRAM TYPES)

Emergency Shelter

From the new ESG regulations, “emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.” Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Emergency shelter programs should be closely linked to an array of programs in order to accomplish this goal of stable permanent housing including, but not limited to, rapid re-housing, transitional housing*, affordable housing placement, and employment. Linkages should also be made to applicable mainstream benefits, such as SOAR (SSI/SSDI Outreach, Access, and Recovery), food stamps, TANF (Temporary Assistance for Needy Families), etc.

Subject to CRD approval within each Subrecipient Agreement, ESG funds may be used for costs of operating emergency shelters and providing essential services to homeless families and individuals in emergency shelter.

Essential Services are limited to not more than 30% of the funding award.

- a. Shelter operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.
- b. Essential services – case management. Eligible case management activities include the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Component services and activities consist of: (A) Using the centralized or coordinated assessment system as required under §576.400(d); (B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility; (C) Counseling; (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits; (E) Monitoring and evaluating program participant progress; (F) Providing information and referrals to other providers; (G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and (H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

* All references to Emergency Shelter include transitional housing for the nonprofit agency Rainbow Village, Inc. authorized to complete these activities under the new Emergency Solutions Grant Program –Rainbow Village, Inc. will meet more intensive shelter service needs to increase the housing stability of the population served through the provision of stays that are typically between 90 days and 2 years.

- c. Essential services – childcare. The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be ESG eligible.
- d. Essential services – education services. When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- e. Essential services – employment assistance and job training. The cost for employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. Learning skills include those skills that can be used to secure and retain a job. Services that assist individuals in securing employment consists of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.
- f. Essential services – transportation. Eligible costs consist of the transportation costs of a program participant’s travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following: (A) The cost of a program participant’s travel on public transportation; (B) if service workers use their own vehicles, mileage allowance for service workers to visit program participants; and (C) the travel costs of staff to accompany or assist program participants to access public transportation.

Family Separation and Emergency Shelter

HUD issued regulations that all shelters are prohibited from denying access to families based on the age of the child. This requirement has been issued through the HEARTH Act and through the ESG Interim Rule. All Community Reinvestment Department ESG funded emergency shelters and transitional housing facilities will comply with this requirement. Non-compliance will result in the recapture of ESG funds. The regulation as printed in the is shown below for

HEARTH Act language on family separation:

‘SEC. 404. Preventing Involuntary Family Separation

“(a) IN GENERAL. – ... any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18.

“(b) EXCEPTION. – Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor – (1) operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be target to families with children in a specific age group; and (2) provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.”

ESG Interim Rule language on family separation:

“(b) Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that used Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.”

Rapid Re-Housing

Rapid Re-Housing programs are designed to help those who are homeless and transitioning into permanent housing. The primary goal is to stabilize a program participation in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Households in the City of Columbus receiving this funding must have an income level at or below 50% Area Median Income (AMI). Enrollment in a rapid re-housing program should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

By ESG regulation at 24 CFR 576, ESG funds may be used to provide housing relocation, stabilization services, and short or medium-term rental assistance as necessary to help a homeless individual or family quickly regain stable housing. Rapid Re-Housing assistance must be provided in accordance with the §576.105 (housing relocation and stabilization services requirements), §576.106 (short- and medium-term rental assistance requirement), and the written standards and procedures established under §576.400.

Homelessness Prevention

Homelessness Prevention is most efficiently implemented when targeted to those at greatest risk of losing housing. Households receiving this funding must have an income level below 30% Area Median Income (AMI) and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition. Enrollment in a prevention program should typically last around 2-6 months, although enrollments can be longer, and rely heavily on a case management plan to ensure long term stability for program participants. Subrecipients should negotiate with landlords as the first step in resolving eviction crises. Prevention implementations should effectively target households at greatest risk of homelessness and assist participants to increase household incomes during enrollment. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

By regulation, ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in §576.2. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, etc.

DEFINITIONS OF HOMELESSNESS

There are *FOUR* categories of **homelessness**:

Category 1:

An individual or family who lacks a fixed, regular, and adequate nighttime residence. {Qualifies for Emergency Shelter, Rapid Re-Housing, Transitional Housing, Outreach, Supportive Services programs}

Homeless

An individual or family:

- (A) With a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground

- (B) Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals) **or**
- (C) Who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Chronically Homeless

An individual who or family in which the head of household meets the following criteria:

- A. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter[†]; and
- B. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least four separate occasions in the last 3 years where the combined length of time homeless in those occasions[‡] is at least 12 months[§]; and
- C. Has a disability.

An individual with one or more of the following conditions:

1. A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that:
 2. Is expected to be long-continuing or of indefinite duration;
 3. Substantially impedes the individual's ability to live independently; and
 4. Could be improved by the provision of more suitable housing conditions.
5. A developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or
6. The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome (HIV).

Source: As defined in the published Final Rule of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH): Defining "Chronically Homeless" effective January 4, 2016.

Federal Register / Vol. 80, No. 233 / Friday, December 4, 2015 / Rules and Regulations
<https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

Category 2:

An individual or family who will imminently lose their primary nighttime residence provided for whom: {Qualifies for Emergency Shelter, Transitional Housing, and Prevention programs}

- (A) The residence will be lost within **14** days of the date of application for homeless assistance;

[†] Includes unaccompanied persons under the age of 18 who meet this definition

[‡] Occasion is defined by a break of at least seven nights not residing in an emergency shelter or safe haven, or residing in a place meant for human habitation (e.g., staying with a friend, in a hotel/motel paid for by program participant)

[§] Stays in institution of fewer than 90 days do not constitute as a break and count toward total time homeless if individual met all of the criteria in A, B, and C above prior to entering that facility.

- (B) No subsequent residence has been identified; **and**
- (C) The individual or family lacks the resources or support networks, [e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing]

Category 3:

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but who meet the following four (4) criteria:

- (A) Are defined as homeless under other legislation including:
 - *Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a)*
 - *Section 637 of the Head Start Act (42 U.S.C. 9832)*
 - *Section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2)*
 - *Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h))*
 - *Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012)*
 - *Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b))* **OR**
 - *Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);*
- (B) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (C) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **AND**
- (D) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4:

Any individual or family who: {Qualifies for Emergency Shelter, Transitional Housing, and Rapid Re-Housing **if** they also meet CATEGORY 1}

- (A) Is fleeing, or is attempting to flee; domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (B) Has no other residence; **and**
- (C) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

DEFINITIONS OF "AT RISK OF HOMELESSNESS"

To qualify, the individual or family must meet two threshold criteria **and** must exhibit one or more specified risk factors. The two threshold criteria are below.

The individual or family must have:

1. Income below 30 percent of median income for the geographic area; **AND**
2. Insufficient resources immediately available to attain housing stability. [*e.g., family, friends, faith-based or other social networks immediately available*] to prevent them from moving to an emergency shelter or another place described in category 1 of the homeless definition.

Risk factors are:

- (A) Has moved frequently because of economic reasons--“2 or more times during the 60 days immediately preceding the application for homelessness prevention assistance.”
- (B) Is living in the home of another because of economic hardship 1
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application.
- (D) Lives in a hotel or motel; [“and the cost of the hotel or motel is not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations.”]
- (E) Lives in severely overcrowded housing; [in a single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau.]
- (F) Is exiting a publicly funded institution; or system of care, [such as a health-care facility, mental health facility, foster care or other youth facility, or correction program or institution.]
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness**.

Extremely low-income households threatened with homelessness require a variety of supportive services to meet their respective needs, including rental/mortgage assistance; security deposit and utility assistance; financial management counseling; landlord-tenant counseling; day care; job counseling; substance abuse counseling; and medical services.

For all ESG activities besides Homelessness Prevention, only “homeless persons” are eligible to receive benefits.

ALLOCATION OF FUNDS

Allocations of ESG funds are determined by the CDBG Review panel for submitted applications during the annual application cycle. The amount of funds awarded will depend on how well a particular application scores. Those applications receiving higher scores will receive awards. Applications with low scores are less likely to receive funding. Projects are funded based on project viability, applicant capacity, and program design.

Applications that are selected for funding will receive funding proportional to their ranking as outlined on the Application Score Sheet. The minimum score below which no funds will be awarded will depend on the overall mix of applications received, how those applications are ranked and the amount of funding available. CRD reserves the right to limit the minimum award amount.

CRD will make every attempt to award limited resources as carefully as possible and will award those agencies with the greatest capacity to effectively administer the funds. It is Community Reinvestment Department’s mission to achieve as

** Note: Agencies are not allowed to use the definition under 576.2(iii)(G) that states “Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness” to determine if a client is at risk of homelessness since this definition has not been defined in the State’s Consolidated Plan.

much geographic distribution as possible, while ensuring the strongest applications receive funding based on their total scores.

Previously awarded projects **do not** guarantee current or future allocation amounts. The allocation of funds will be dependent upon funding from the Department of Housing and Urban Development (HUD) and The City of Columbus' Consolidated Plan goals. Previous awards **do not** guarantee funds or serve as an indication of the level of funding for any subsequent years.

REALLOCATION OF FUNDS

Community Reinvestment Department may deem it necessary to recapture ESG funds. Subrecipients who applied during the award cycle may be eligible to receive additional funds based on their expenditure rate and other performance criteria outlined below.

Subrecipients identified as eligible will be required to provide additional documentation at the time of additional funding notification. Factors Community Reinvestment Department will consider for additional funds through reallocation may include:

- Current expenditure rate.
- Subrecipient ability to provide the minimum match.
- Percentage allocated to Emergency Shelter Component.
- Subrecipient past and current monitoring results which can include but not limited to:
 - Unresolved issues as a result of an ESG desk audit,
 - TA visit, and/or
 - audit review.
- Subrecipients must be in good standing with HMIS, onsite record keeping, and submission of reimbursement requests.
- Subrecipients receiving recaptured funds must be able to meet all commitment and expenditure guidelines.

If the subrecipient can successfully demonstrate eligibility, they may be considered for a reallocation of funds. With good cause, Community Reinvestment Department reserves the right to modify the stated requirements at any time.

DOCUMENTATION AND RECORD KEEPING REQUIREMENTS

Housing Status Documentation

ESG subrecipients must establish and follow written intake procedures to ensure program compliance. Intake procedures require evidence documentation in order to establish and verify homeless, at-risk of homelessness, or domestic violence status. THIRD PARTY SOURCE DOCUMENTS ARE THE PREFERRED METHOD OF VERIFYING AND DOCUMENTING HOUSING STATUS.

Subrecipients must keep ESG records for 5 years after the expenditure of all funds from the grant.

Preferred Order of Documentation

The order of priority for evidence establishing and verifying homeless status is:

1. Third-party documentation – source documents provided by an outside source.
2. Intake worker observation – documented by Subrecipient's ESG staff.
3. Certification from the person seeking assistance – Subrecipient's ESG staff must certify efforts made to obtain third party documentation before allowing applicants to self-certify.

Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Housing Status Documentation Requirements and Self-Certification Requirements

Homeless **CATEGORY 1** acceptable evidence includes:

- A. Community Reinvestment Department/DCA Housing Status Verification and Self Certification Forms;
- B. HMIS Verification of Homelessness;
 - i. HMIS can be used to verify homelessness by accessing a client record, determining that the ESG applicant is (at the time of application for ESG funds) enrolled in a program for homeless individuals or families, and printing a screen shot of that HMIS evidence for the file. This method will primarily be used by rapid re-housing providers.
- C. A written observation by an outreach worker of the conditions where the individual or family was living;
- D. A written referral by another housing or service provider; **OR**
- E. A certification by the individual or head of household seeking assistance.

Homeless **CATEGORY 1 and is exiting an institution** where he or she resided for 90 days or less, acceptable evidence includes:

Evidence listed above for CATEGORY 1 **AND** one of the following:

- A. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, starting the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; **OR**
- B. Where the evidence listed above in (A) is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in (A) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

Homeless **CATEGORY 2** evidence includes:

- A. A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; **OR**
- B. The equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law.

For applicants whose primary nighttime residence is a hotel or motel room **not** paid for by charitable organizations or Federal, State or local government programs:

- A. Evidence that the individual or family lacks the resources to reside there for **more than 14 days** after the date of application for homeless assistance; **OR**
- B. An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than **14 days** after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible.

To be found credible, the oral statement must either:

- Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance **AND**
- Be documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement.

If the intake worker is unable to contact the owner or renter:

- 1) The intake worker must provide written documentation certifying that he/she performed due diligence in attempting to obtain verification and written certification that the applicant's statement was true and complete;
- 2) Certification by the individual or head of household that no subsequent residence has been identified; **AND**
- 3) Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

Homeless **CATEGORY 4:** Acceptable evidence includes:

If the individual or family is receiving shelter or services provided by a victim service provider:

- A. Community Reinvestment Department Housing Status Self Certification Form; **OR**
- B. A certification by the intake worker.

Otherwise:

- The Community Reinvestment Department Housing Status Self Certification form documenting that applicant is fleeing a domestic violence situation, has not identified a subsequent residence, and lacks the resources or support networks, e.g. family, friends, faith-based, or other social networks, needed to obtain housing where his/her safety would not be jeopardized; **AND**
- Written observation by the intake worker, a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, or records contained in HMIS.

Homeless **CATEGORY 4:** Acceptable evidence includes:

1. When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609.
2. Evidence of the second eligibility criterion ("lacks sufficient resources...") is:
 - a. **Source documents** – notice of termination from employment, unemployment compensation statement, bank statement, healthcare bill showing arrears, utility bill showing arrears;
 - b. To the extent that source documents are unobtainable, a **written statement by the relevant third party** – (e.g. *former employer, public administrator, relative*) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria of the definition of "at risk of homelessness"; **OR**
 - c. If source documents and third-party verification are unobtainable, a **written statement by intake staff** describing the efforts taken to obtain the required evidence.
3. Evidence for documenting at least one of the 7 risk factors is:
 - a. **Source documents** – notice of termination from employment, unemployment compensation statement, bank statement, healthcare bill showing arrears, utility bill showing arrears;
 - b. To the extent that source documents are unobtainable, a **written statement by the relevant third party** – (e.g. *former employer, public administrator, relative*) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria of the definition of "at risk of homelessness"; **OR**

- c. If source documents and third-party verification are unobtainable, a **written statement by intake staff** describing the efforts taken to obtain the required evidence. *Can include staff visit to applicant home to verify eligibility.*

INTAKE, ELIGIBILITY ASSESSMENT, AND RE-CERTIFICATION

Intake

All ESG applicants must participate in an initial consultation to assess needs and to determine program eligibility. The consultation will include verification of homelessness status or risk for homelessness, applicant's barriers to housing stability, collection of HMIS universal data elements, and program elements as necessary.

Subrecipients will complete the following procedures:

1. Check HMIS system to determine if the applicant is currently receiving assistance from any other federal funding sources. Clients cannot receive funding for duplicate services at the same time. A printed HMIS screen can be used as documentation in the applicant's file.
2. Collect the required ESG documentation (evidence to establish and verify the client's housing status; copy of documentation to establish annual income; certification that client has insufficient support networks; etc.) as relevant.
3. Case Manager will record required HMIS data in the Pathways COMPASS ROSE system (or approved system for use by Domestic Violence Agencies) for **all program participants**.
4. If client is not eligible for ESG, Community Reinvestment Department ESG subrecipients are required to include documentation regarding non-eligibility and to identify other appropriate service providers within the Continuum that can more effectively meet the applicant's needs.

Eligibility Assessment for Emergency Shelter

Eligibility for these programs requires a verification of homelessness. See previous section on documenting housing status. There are no income eligibility requirements for emergency shelter, transitional housing, outreach, or supportive services grants.

Income Eligibility for Homelessness Prevention and Rapid Re-Housing Programs

- To qualify for **Rapid Re-Housing** funding the household income must be **at or below 50 percent** AMI for the geographic area.
- To qualify for **Homelessness Prevention** funding the household income must be **below 30 percent** AMI for the geographic area.

Area Median Income is defined by HUD and updated annually. The most recent guidelines should be used each year. The following site can be accessed to determine AMI:

<https://www.huduser.gov/portal/datasets/il.html>

The AMI limits can be downloaded by selected the appropriate limit year. Once the new page has loaded, locate the section titled "HUD 30% Limit All Areas" by scrolling down and select the desired file format and download the file. The AMI limits listed for Muscogee County-Columbus, GA HUD Metro FMR Area apply to Community Reinvestment Department.

Documentation that applicants meet income eligibility guidelines is required for Prevention and Rapid Re- Housing programs. Worksheets have been created to help Subrecipients determine and document eligibility for both programs. A sample is contained in the “Forms” section of this guide and electronic versions are available from the Community Development Office. Total household income should include allowable sources from all household members.

Income Calculations

Income calculations are modeled after the requirements for the HOME Investment Partnerships program (24 CFR 92.508) and other HUD regulations. Guidance and HUD’s income calculator can be found here: <https://www.hudexchange.info/incomecalculator/>

Income inclusions and Exclusions: 24 CFR 5.609(b and c)

http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5#sg24.1.5_1603.sg6

Changes in Income

The subrecipient should require each program participant receiving Homelessness Prevention or Rapid Re-Housing assistance to notify the Subrecipient regarding changes in the program participant’s income or other circumstances (e.g., changes in household composition) that affect the program participant’s need for ESG assistance. When notified of a relevant change, the subrecipient must re-evaluate the program participant’s eligibility and the amount and types of assistance the program participant needs.

Re-Certification

Re-Certification determines whether or not an individual or family is still eligible for a program and is required for the **Homelessness Prevention and Rapid Re-Housing Program**. It occurs:

- Every 90 days after program enrollment date; **AND**
- Annually for those enrolled in the ESG program one year after initial enrollment date.

90 Day Re-Certification for Rapid Re-Housing includes determination that the household^{}:**

1. Is at or below 50% AMI.
2. Is at risk of returning to homelessness.
3. Lacks the financial resources and support networks needed to obtain housing or remain in their housing.

90- and 365-Day Re-Certifications for Homelessness Prevention includes determination that the household^{}:**

1. Is below 30% AMI.
2. Remains at-risk of homelessness.
3. Lacks the financial resources and support networks needed to remain in their housing.

CASE MANAGEMENT

Community Reinvestment Department subrecipients are expected to provide case management to **ALL** ESG program participants, including connecting program participants to mainstream and other resources. Subrecipients should visit www.compass.ga.gov to screen for eligibility and apply for mainstream benefits on behalf of program participants.

Subrecipients must assist each program participant, as needed, to obtain:

1. Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; **AND**

^{**} For Rapid Re-housing Annual re-certifications, households must have an income below 30% AMI. This is required by law and different from the eligibility and 90-day re-certification criteria.

^{**} A fourth month of assistance cannot be issued until re-certification is complete.

2. Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - A. Medicaid (42 CFR chapter IV, subchapter C);
 - B. Supplemental Nutrition Assistance Program (7 CFR parts 271-283);
 - C. Women, Infants and Children (WIC) (7 CFR part 246);
 - D. Federal-State Unemployment Insurance Program (20 CFR parts 601-603, 606, 609, 614-617, 625, 640, 650);
 - E. Social Security Disability Insurance (SSDI) (20 CFR part 404);
 - F. Supplemental Security Income (SSI) (20 CFR part 416);
 - G. Child and Adult Care Food Program [42 U.S.C. 1766(t) (7 CFR part 226)];
 - H. Other assistance available under the programs listed in §576.400(c).

Homelessness Prevention and Rapid Re-Housing Case Management

Housing stability case management is required of subrecipients providing Homelessness Prevention or Rapid Re-Housing assistance.

Subrecipients must:

1. Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; **AND**
2. Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

PROPERTY STANDARDS

All recipients of Community Reinvestment Department ESG funds are expected to comply with the following property standards requirements: Habitability Standards; Environmental Reviews; and Lead

Based Paint requirements.

HABITABILITY STANDARDS

The ESG Interim Rule establishes different habitability standards for emergency shelters and for permanent housing (the Rapid Re-housing and Homelessness Prevention components). Subrecipients must document compliance with the applicable standards. A Habitability Standards Checklist is provided in the Property Related Forms section of the Forms Appendix.

Minimum Habitability Standards for Emergency Shelter

Emergency shelters that receive ESG funds for renovation or shelter operations must meet the following minimum standards for safety, sanitation, and privacy provided in §576.403(b). Subrecipients may also establish standards that exceed or add to these minimum standards.

1. Structure and materials

Shelter buildings must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

2. Access

The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.

3. Space and security

Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

4. Interior air quality

Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

5. Water supply

The shelter's water supply must be free of contamination.

6. Sanitary facilities

Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

7. Thermal environment

The shelter must have any necessary heating/cooling facilities in proper operating condition.

8. Illumination and electricity

The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

9. Food preparation

Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

10. Sanitary conditions

The shelter must be maintained in a sanitary condition.

11. Fire Safety

There must be at least one working smoke detector in each occupied unit of the shelter. Smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. In addition to fire detector requirements, there must be an alternate exit available in the event of fire or other emergency. *The reasonable cost of installing smoke detectors is an eligible ESG cost.*

Habitability Standards for Permanent Housing

Subrecipients cannot use ESG funds to help a program participant **remain in OR move into housing** that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components.

1. Structure and materials

The structure must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

2. Space and security

Each resident must be provided with an acceptable place to sleep and adequate space and security for themselves and their belongings.

3. Interior air quality

Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

4. Water supply

The water supply must be free of contamination.

5. Sanitary facilities

Each resident must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

6. Thermal environment

The housing must have any necessary heating/cooling facilities in proper operating condition.

7. Illumination and electricity

The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances.

8. Food preparation

Food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

9. Sanitary conditions

The housing must be maintained in a sanitary condition.

10. Fire Safety

The unit must include at least one working smoke detector on each occupied level of the unit. Smoke detectors must be located near sleeping areas. If the unit is occupied by hearing-impaired persons, smoke detectors have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. All public areas must have at least one working smoke detector. In addition to fire detector requirements, there must be an alternate exit available in the event of fire or other emergency.

ENVIRONMENTAL REVIEWS

In accordance with 24 CFR Part 58 an environmental review must be performed before any funds are committed to a project. Environmental Reviews are necessary for Emergency Shelter (both operating and hotel/motel vouchers), Rapid Re-Housing, and Homelessness Prevention programs. Prior to committing funding to eligible program participants, Subrecipients will complete the Environmental Review forms (provided in the Property Related Forms section of the Forms Appendix) and submit them to the CRD for review and approval. Subrecipients must file the approval form and the executed Environmental Review forms in each client file.

LEAD-BASED PAINT DISCLOSURES AND REMEDIATION

Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to

the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches.

Subrecipients that receive funding for Emergency Shelter, Homelessness Prevention and Rapid Re-Housing **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.

Emergency Shelter Requirements for Lead Based Paint

Most emergency shelters are exempt, because they fall under the definition of zero-bedroom dwellings, which are exempt under the Title X statute. If the shelter does not qualify for zero-bedroom exemption, it is covered by the regulation.

A zero-bedroom dwelling is defined in section 35.110 as “any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings.” The term “single room occupancy housing” is defined as “housing consisting of zero-bedroom dwelling units that may contain food preparation or sanitary facilities or both.” Group homes are exempt if they consist of “rentals of individual rooms in residential dwellings”. Subrecipients should refer to 24 CFR Part 35, subpart K of the implementing regulations for guidance on appropriate steps to carry out. Emergency Shelter Subrecipients **MUST** contact Community Reinvestment Department immediately if they suspect that they are not in full compliance with these regulations.

Homelessness Prevention and Rapid Re-housing Requirements for Lead Based Paint

A lead-based paint visual assessment must be completed for all Homelessness Prevention and Rapid Re-Housing units that meet the three following conditions:

1. The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears); **AND**
2. The unit was constructed prior to 1978; **AND**
3. A child under the age of six, or a woman who could become pregnant is or may be living in the unit.

If any property meets all of the above three conditions, you should carry out appropriate measures per the Lead-Based Paint Screening Worksheet provided in the Property Related Forms section of the Forms Appendix. Please contact the Community Reinvestment Department Community Development Program if you require further assistance.

RENTAL ASSISTANCE REQUIREMENTS

Community Reinvestment Department has not established a mandatory share of rent and utility costs that program participants must contribute while in Rapid Re-Housing and/or Homelessness Prevention programs. Community Reinvestment Department will rely on the best judgment of Subrecipients to determine households for whom this approach is reasonable, and to determine reasonable amounts in those cases. Subrecipients will be expected to submit any policy or procedure they intend to implement concerning this to the Community Reinvestment Department and obtain approval prior to implementation.

Community Reinvestment Department encourages Subrecipients to provide effective, wrap-around case management to all program participants, but recognizes that some participants may unsuccessfully face obstacles after ESG discharge and will work with Subrecipients on developing policies regarding a limit on program enrollments.

RENTAL ASSISTANCE AGREEMENTS

The requirements for short- and medium-term rental assistance require that program participant, and housing owners have written leases, for the provision of rental assistance. In addition, the ESG interim rule also requires a rental assistance agreement between the subrecipient (agency) and the housing owner.

The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a Rental Assistance Agreement. The Rental Assistance Agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The Rental Assistance Agreement must provide that, during the term of the Agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

The Rental Assistance Agreement must contain the same payment due date, grace period, and late payment penalty requirements as in the program participant's lease. The Rental Assistance Agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease;
2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG rental assistance.

A Sample Rental Assistance Agreement is in the Forms Appendix section of this Guidebook.

Late Payments

The subrecipient must make timely payments to each owner in accordance with the Rental Assistance Agreement. The Community Reinvestment Department Subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Leases

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or cancelled checks.

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent established by HUD, as provided under 24 CFR 982.503, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to make sure that program participants can remain in their housing after their assistance ends.

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for the comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

- Rent reasonableness can be determined by accessing www.georgiahousingsearch.org. Other local resources may be used to obtain information, e.g. market surveys, classified ads.
- Supporting documentation includes a copy of the signed and dated Rent Reasonableness chart.
- The proposed unit must be compared to three (3) other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county FMR areas. The FMR's include the housing unit rent plus

the costs of all tenant-paid utilities, except telephones, cable or satellite television services, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law HUD is required to publish new FMRs at the start of the federal fiscal year, on October 1. Fair Market Rents are updated by HUD every year and can be found online at: <http://www.huduser.org/portal/datasets/fmr.html>.

When calculating the FMR, be sure to include the utility allowance provided by your local housing authority. The monthly utility allowance is added only for those utilities that the tenant pays for separately from the rent (i.e. if range and refrigerator are included in the rental price, the monthly allowance for those items would not be used in the calculation).

The utility allowance does not include telephone, cable or satellite television service, and internet service. If all utilities are included in the rent, there is no utility allowance.

When calculating whether or not the “Contract Rent” (or the amount payable to the landlord) is at or below the FMR, be sure to add the contract rent to the utility allowance provided by the appropriate housing authority. The monthly utility allowance is calculated only for those utilities that the tenant pays for separately from the rent (i.e. if range and refrigerator are included in the rental price, the monthly allowance for those items would not be used in the calculation). The utility allowance does not include telephone, cable or satellite television service, and internet service. If all utilities are included in the rent, there is no utility allowance. To determine whether or not the proposed unit meets the FMR requirements use this formula:

FMR – Utility costs included in rent per PHA schedule = Maximum contract allowed rent

Example:

- *FMR for 2 BR unit in Muscogee County = \$874.00*
- *The proposed 2-bedroom apartment unit in Muscogee County has a Contract Rent of \$650.00*
- *The HUD Utility Allowance for “heating, cooking, hot water, electricity and air conditioning” totals = \$176.00*
- *It should be noted that this unit does not have a “heat pump” and the contract rent payable to the landlord includes “water, sewer, trash service, a range and a refrigerator.” Otherwise, the Utility Allowance would be higher.*
- *For example: \$650.00 + \$176.00 = \$826.00. Since \$874.00 is the maximum rent allowed, the proposed unit meets the FMR standard and can be reviewed for rent reasonableness.*

Use with Other Subsidies

ESG financial assistance for rents and utilities cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the (URA) payments.

Except for a one-time payment of rental arrears on the tenant’s portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Reporting Requirements

ESG subrecipients are required to submit an annual progress report to Community Reinvestment Department that includes HMIS data and other information as necessary. Currently, the ESG Beneficiary Report is the required template, and technical assistance will be provided to ensure that the proper data is being submitted for all subrecipients.

HUD is expected to release new data standards and reporting requirements for ESG within the current grant year. We cannot predict when this will occur but are taking measures to ensure that data collected in HMIS will meet new

requirements as best as we can anticipate. In the meantime, the HUD APR Report in HMIS will be used as a benchmark for data collection by Community Reinvestment Department and Subrecipients.

Data Quality Checks and the Reimbursement Process

CRD staff will run data quality reports when reimbursement requests are submitted by ESG Subrecipients. Data quality reports will measure the levels of missing data and answers of “Don’t Know/Refused” for Universal Data Elements and Program Data Elements, among other quality measures. HMIS data reviewed will include, but is not limited to, completion of client income and benefits at program enrollment and discharge, special needs, and bed utilization data.

Reimbursement requests for programs with unacceptable levels of data quality issues will be held by Community Reinvestment Department until the Subrecipient takes corrective action and data has been corrected. At that time another data quality will be run to measure levels of improvement.

Reports will examine all client data from the beginning of the grant through the date the reimbursement request is received. A sample data quality report is available in the Forms Appendix.

Data Quality Compliance for Domestic Violence (DV) Service Providers

ESG subrecipients who are domestic violence service providers and are providing ESG assistance to victims of domestic violence should not use HMIS Pathways but should use a Community Reinvestment Department approved secure database system to record client data. All DV providers are expected to comply with the same Data Quality standards as agencies that are not serving victims of domestic violence and must meet all reporting requirements.

Follow-Up Contact After Program Discharge

ESG subrecipients are expected to make follow-up contacts with program participants after discharge at intervals designated in their contracts in order to determine current housing status. Subrecipients will set up Program Follow-ups attached to each ESG program in HMIS before enrolling participants into their programs in order to track follow-up outcomes.

CoC COORDINATION WITH ESG

To ensure coordination among resources with the Georgia Balance of State Continuum of Care (CoC), Community Reinvestment Department subrecipients will utilize the following approaches and procedures:

1. Common intake form based on HMIS intake – an ESG intake form is available in the Forms Appendix as well as the Pathways Community Network Institute’s website so that required data will be collected for all program applicants. If subrecipients have additional information that they would like to collect, they can make addendums to the form, but all data on this form must be captured.
2. Near-statewide HMIS prevents duplicative efforts – All subrecipients will be required to use HMIS per the Interim Rule. This helps avoid duplication of services and HMIS client data, and provides an opportunity to document homelessness or risk of homelessness. All Subrecipients are required to use the Pathways COMPASS HMIS to enter relevant data. *Domestic violence service providers are required to use a Community Reinvestment Department approved database system.*
3. Required Barriers to Housing Stability Assessment – a common assessment is recorded and stored in HMIS at program enrollment/system entry by all ESG Subrecipients.
4. Required electronic referrals – providers will be required to record referrals in HMIS.
5. Online access to mainstream benefit application tool – ESG subrecipients will use the Statewide Pathways COMPASS system to evaluate participant eligibility for mainstream benefits such as TANF, SNAP, etc. (<https://compass.ga.gov/selfservice/>).

Centralized or Coordinated Assessment

The Georgia Balance of State CoC will be expected to develop and implement a centralized or coordinated assessment system. The ESG regulation requires all subrecipients to participate in the system to initially assess the eligibility and needs of each household seeking homeless assistance. Community Reinvestment Department ESG subrecipients will be expected to implement this provision after the CoC has devised and implemented such an assessment system.

A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool. The assessment system may vary from community to community based on individual communities' needs. The CoC will develop a common assessment tool for use throughout the community.

HUD believes that centralized or coordinated assessment systems are important in ensuring the success of homeless assistance and homeless prevention programs in communities. In particular, such assessment systems help communities systematically assess the needs of program participants and effectively match each individual or family with the most appropriate resources available to address that individual or family's particular needs.

The Georgia Balance of State CoC (administered by the Georgia Department of Community Affairs) will begin devising a system that will incorporate the above elements and consult with its stakeholders to ensure that the system aligns with their other obligations. We encourage your involvement.

PERFORMANCE STANDARDS, MEASURES, AND COMMUNITY REINVESTMENT DEPARTMENT GOALS

Performance standards provide a measure for ESG recipients to evaluate the effectiveness of each ESG service provider in the areas of: (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and (d) Reducing clients' housing barriers or housing stability risks.

Community Reinvestment Department will evaluate each ESG service provider's performance based on the following standards:

1. Develop and adhere to priorities for service delivery by need.
2. Assist clients in rapid movement to permanent housing from shelters or from the street.
3. Ensure that clients have easy access to services (No Wrong Door Approach).
4. Provide comprehensive case management to address a spectrum of needs for each client.

A table depicting Community Reinvestment Department's goals for the Emergency Solutions Grant Program is detailed on the following page.

ESG Program Component	Performance Measure	Applicable Standard Reference	Target Percentage	Performance Measure	Applicable Standard Reference	Target Percentage
Emergency Shelter (ES)	Percentage of clients who exit shelter to permanent housing	2	75%	Percentage of clients who exit shelter in less than 90 days	2	90%
ES – Esn. Services	Percentage of eligible clients in	3,4	95%	Percentage of clients who have a special	1,4	50%

	ES who are connected with mainstream resources before leaving shelter			need (as identified on Pathways' Special Needs screen) or two or more significant barriers to housing stability		
<i>Street Outreach</i>	<i>The Community Reinvestment Department ESG Program will not operate Street Outreach activities.</i>					
Homelessness Prevention	Percentage of clients receiving assistance who are still stably housed three months after assistance ends	2,4	60%	Percentage of clients receiving assistance who are still stably housed six months after assistance ends	2,4	50%
Rapid Re-Housing	Percentage of clients receiving assistance who are still stably housed three months after assistance ends	2,4	50%	Percentage of clients receiving assistance who are still stably housed six months after assistance ends	2,4	40%

REQUIRED WRITTEN STANDARDS – POLICIES AND PROCEDURES

Community Reinvestment Department requires that each Subrecipient establish and consistently apply policies and procedures for each ESG program administered by the Subrecipient. All written standards require approval from Community Reinvestment Department prior to implementation.

At a minimum these written standards must include:

Required for ALL PROGRAMS:

1. Standard policies and procedures for evaluating eligibility.
2. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
3. Participation in HMIS or approved HMIS database system for domestic violence agencies.
 - a. The subrecipient must ensure that data on all persons served and all activities assisted under ESG are entered into the Pathways Compass HMIS. If the subrecipient is a victim service provider, it may use an approved HMIS database system, to collect client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data.

Additional standards for EMERGENCY SHELTER, PREVENTION, and RAPID RE-HOUSING:

1. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, [*e.g.*, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest].

2. Policies and procedures for assessing, prioritizing, and reassessing needs for essential services related to emergency shelter.
3. Policies and procedures for determining and prioritizing homelessness prevention and rapid re-housing assistance;
 1. Standards for determining what percentage or amount of rent and utilities costs, if any, each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
 2. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time, if at all;
 3. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of times the program participant may receive assistance.

TERMINATION, COMPLAINTS, APPEALS AND CONFIDENTIALITY POLICIES

As part of each program’s policies and procedures, subrecipients must develop policies regarding termination of assistance to participants, complaints, appeals, and confidentiality procedures. These policies must be approved by Community Reinvestment Department before Subrecipients begin serving applicants.

Terminating Assistance

If a program participant violates program requirements, the Subrecipient may terminate the assistance in accordance with a formal process established by the Subrecipient, and approved by the recipient, that recognizes the rights of individuals affected. The Subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant’s assistance is terminated only in the most severe cases. Subrecipients should make referrals to other housing providers that are pertinent or suitable.

Prevention and Rapid Re-Housing Terminations

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

1. Written notice to the program participant containing a clear statement of the reasons for termination;
2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinated of that person) who made or approved the termination decision; **AND**
3. Prompt written notice of the final decision to the program participant.

Ability to Provide Further Assistance

Termination does not bar the subrecipient from providing further assistance at a later date to the same family or individual.

XIV. DOCUMENTING PERSONS WITH DISABILITIES

***Person with disabilities* means a household composed of one or more persons at least one of whom is an adult who has a disability.**

1. A person shall be considered to have a disability if he or she has a disability that:
 - (i) Is expected to be long-continuing or of indefinite duration;
 - (ii) Substantially impedes the individual’s ability to live independently;
 - (iii) Could be improved by the provision of more suitable housing conditions; and
 - (iv) Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.

2. A person will also be considered to have a disability if he or she has a developmental disability, as defined in this section.
3. A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
4. Notwithstanding the preceding provisions of this definition, the term person with disabilities includes, except in the case of the SRO component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

Developmental disability means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

1. A severe, chronic disability of an individual that—
 - i. Is attributable to a mental or physical impairment or combination of mental and physical impairments
 - ii. Is manifested before the individual attains age 22
 - iii. Is likely to continue indefinitely
 - iv. Results in substantial functional limitations in three or more of the following areas of major life activity:
 - A. Self-care
 - B. Receptive and expressive language
 - C. Learning
 - D. Mobility
 - E. Self-direction
 - F. Capacity for independent living
 - G. Economic self-sufficiency **AND**
 - H. Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
2. An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of “developmental disability” in this section if the individual, without services and supports, has a high probability of meeting those criteria later in life.

Written documentation of disability status includes:

1. Written verification from a professional who is licensed by the state to diagnose and treat that condition, that the disability is expected to be long-continuing or of indefinite duration and that the disability substantially impedes the individual’s ability to live independently; **AND**
2. Written verification from the Social Security Administration, or the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation).

Information on disability status should be obtained in the course of client assessment once the individual is admitted to a project, unless having a disability is an eligibility requirement for entry into the project. Where disability is an eligibility requirement, an intake staff-recorded observation of disability may be used to document disability status as long as the disability is confirmed by the aforementioned evidence within 45 days of the application for assistance.

FAITH BASED ACTIVITIES

- A. Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the Federal Government nor a State or local government receiving funds under ESG shall discriminate against an organization on the basis of the organization's religious character or affiliation.
- B. Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.
- C. Any religious organization that receives ESG funds retains its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG-funded religious organization retains its authority over its internal governance, and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.
- D. An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.
- E. ESG funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. ESG funds may be used for the rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and inherently religious activities, ESG funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (*see* 24 CFR parts 84 and 85).
- F. If the recipient or a grantee that is a local government voluntarily contributes its own funds to supplement federally funded activities, the recipient or grantee has the option to segregate the Federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

TRAINING

The Community Development Office will provide training for ESG Subrecipient primarily in the first half of the grant year. Trainings are required and will cover program implementation, reporting requirements, reimbursement procedures, technical assistance and on-site monitoring visits. Additionally, all ESG Subrecipients are required to participate in the bi-weekly Emergency Assistance Action Team meetings. HMIS technical assistance and training will be provided by the HMIS Coordinator.

HOUSING SUPPORT STANDARDS

All recipients of ESG funding must meet HUD standards for housing support services. Utilizing a strength-based approach to promote housing stability, the standards are guided by a philosophy that values participant (meaning clients,

consumers, etc.) choice within an atmosphere that promotes respect between staff and participant. The standards will inform processes within your program such as intake and assessment, service delivery and post discharge follow up.

To ensure compliance with this policy all agencies must become familiar with the required HUD standards. The ESG Program Manager for the Community Development Office will also offer ESG trainings and technical assistance for ESG Subrecipients.

QUICK REFERENCE GUIDE:

Homelessness Prevention and Rapid Re-Housing

ESG Requirements

Key Program Regulations **24 CFR Parts 84, 85, 91, & 576**

Grant Uses	
Eligible Components	<ol style="list-style-type: none"> 1. Street Outreach 2. Emergency Shelter 3. Homelessness Prevention (HP) 4. Rapid Re-Housing (RRH) 5. Homeless Management Information System (HMIS) 6. Administrative Costs, capped at 7.5%
Metropolitan Cities, Urban Counties, and Territories	<p>May carry out eligible activities through employees, procurement contracts, or sub-grants to private nonprofit organizations. In addition, urban counties may carry out activities through any of their member governments. Public housing agencies are not eligible subrecipients, with no waivers.</p>
Determining & Documenting Participant Eligibility	
General Requirements Applicable to Both Rapid Re-Housing & Homelessness Prevention	
Written Standards	<p>The recipient must develop written standards for administering rapid re-housing and homelessness prevention assistance and include these in the Consolidated Plan/Action Plan. See 24 CFR part 576.400(e) for more detail.</p>
Documenting eligibility determinations	<p>Recipients must establish written policies & procedures specific to recordkeeping (documenting eligibility assessments at intake and re-evaluation). Program must maintain documentation on all households seeking assistance. If determined ineligible, documentation must reflect reasons.</p>
Terminating Assistance	<p>Recipient or subrecipient must establish formal process, consisting of :</p> <ol style="list-style-type: none"> 1. Written notice to program participant 2. Review of decision, including opportunity to present objection 3. Prompt written notice of final decision. <p>Must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination, so that a program participant's assistance is terminated only in the most severe cases.</p>

Rapid Re-Housing (RRH) Eligibility Criteria	
Determining Eligibility	Initial evaluations required for all households seeking RRH assistance. Re-evaluation of eligibility required at least annually. Additionally, a recipient can choose to require re-evaluation each time a participant experiences a change in income, household composition, or need for assistance.
Eligibility for Rapid Re-housing Assistance	RRH assistance is only available to individuals and families who meet the definition for literally homeless (Category 1 under the Homeless Definition Final Rule).
Initial Assessment and Re-Evaluation	<p>No income threshold at initial evaluation. Income must be at or below 30% of AMI at annual re-evaluation, and:</p> <ul style="list-style-type: none"> • Must have no appropriate subsequent housing options. • Must lack sufficient resources and support networks to retain housing. <p>Recipient or subrecipient must assess household need at initial assessment to establish the amount and types of assistance needed to obtain housing, and at and re-evaluation to establish the amount and types of assistance needed for retaining housing.</p>
Homelessness Prevention (HP) Eligibility Criteria	
Determining Eligibility	Initial evaluations required for all households HP assistance. Re-evaluations required at least every 3 months for HP participants. Additionally, a recipient can choose to require re-evaluation each time a participant experiences a change in income, household composition, or need for assistance.
Eligibility for Homelessness Prevention	<p><i>Note that assessment criteria are not identical between evaluations (initial vs. re-evaluation).</i></p> <p>HP assistance can be available to individuals and families that are in homeless Categories 2, 3, and 4, but not literally homeless.</p> <p>HP assistance can also be available to individuals and families in at-risk of homelessness Categories 1, 2, and 3.</p>

<p>Initial Assessment and Re-Evaluation</p>	<p>At initial assessment, household must have income below 30% AMI, and:</p> <ul style="list-style-type: none"> - must lack resources and support networks that would prevent them from moving into an emergency shelter or other place described in Category 1 of the homeless definition. <p>At re-evaluation, household must have income that is at or below 30% of AMI, and :</p> <ul style="list-style-type: none"> - must lack sufficient resources and support networks to retain housing without ESG assistance. <p>Recipient or subrecipient must assess household need at initial and re-evaluation of eligibility to establish the amount and types of assistance needed for housing stability or to remain in permanent housing.</p>
<p>Dwelling/Unit Requirements</p>	
<p>Environmental Review Requirements</p>	<p>Environmental Reviews according to 24 CFR Part 50 Categorically Excluded and NOT subject to 24 CFR Part 58.5 (CENST) must be conducted for all agency service locations and prevention and rapid re-housing clients prior to committing funds. Proposals which have significant adverse environmental impacts may be rejected.</p>
<p>Habitability Standards</p>	<p>Habitability assessment is required any time ESG funds are used to help a participant remain in or move into housing.</p>
<p>Lead-Based Paint Requirements</p>	<p>A lead-based paint visual assessment is required any time a child under the age of 6 will be living in the unit and it was constructed before 1978. Applicable statute and regulations: Must comply with LBP Poisoning Prevention Act of 1973 and applicable regulations found at 24 CFR 35, Parts A, B, H, J, K, M and R.</p>
<p>Rent Reasonableness</p>	<p>Rental assistance cannot be provided unless the unit's rent is reasonable in relation to the rents being charged for comparable units in the private (unassisted) market.</p>
<p>Fair Market Rents</p>	<p>Rental assistance cannot be provided unless rent complies with FMR, which is set by HUD annually.</p>
<p>Lease and Assistance Agreement Requirements</p>	
<p>Rental Assistance Agreement</p>	<p>Rental assistance cannot be provided without an agreement between the recipient or subrecipient and owner/property manager.</p>
<p>Lease Requirements</p>	<p>Lease between program participant and owner/property manager required. Written leases must be legally binding. Required unless financial assistance is limited solely to payment of rental arrears. Oral leases, if enforceable by State law, are acceptable when assistance is solely for rental arrears.</p>

Rental Assistance	
Type Tenant- vs. Project-Based Short-term Medium-term	Rental assistance can be tenant-based or project-based. Up to 3 months of rent. For more than 3 months, up to 24 months in any 3 year period.
Arrears	One-time payment for up to 6 months of rent in arrears, including late fees on arrears.
Late Payment Fees	Only allowed with one-time arrears assistance. <i>Note:</i> ESG specifically prohibits late payment fees incurred by recipient/subrecipient under Rental Assistance Agreement with owners.
Use with other subsidies	Except for one-time payment of arrears on tenant’s portion of rent payment, rental assistance cannot be provided to participant who is receiving tenant- or project-based rental assistance through other public sources during same time period, including units receiving operating subsidies. Also, rental assistance cannot be provided for the same time period covered by URA replacement housing payments.
Maximum Amounts & Period of Assistance	Limits apply to total assistance an individual receives, either as an individual or as part of a family. Must not exceed 12 months in any 3-yr period. Within the HUD limits, recipient has discretion to set limitations such as: <ul style="list-style-type: none"> • Maximum amount or % of rental assistance; • Maximum number of times served with rental assistance; and • Share of rent costs covered by participants.
Housing Relocation & Stabilization Services	
Financial Assistance	Eligible financial assistance costs covered under Housing Relocation & Stabilization Services (HRSS) listed below.
Rental Application Fee	Only fees charged by owner to all applicants.
Security deposits	Must not exceed two months’ rent.
Last month’s rent	If necessary, may be paid at the time owner is paid the security deposit and first month’s rent. Must not exceed one month’s rent.
Utility deposit	Standard deposit required by utility companies for gas, electric, water and sewage.
Utility payments	Up to 12 months per participant, per service, including up to 6 months of payments in arrears, per service.
Moving costs	Truck rental, hiring a moving company, temporary storage for up to 3 months, provided that fees are accrued after participant is determined eligible and before the participant moves into permanent housing. Storage fee arrears are not eligible.

Services	Service costs covered under Housing Relocation & Stabilization Services below.
Outreach & engagement	Eligible under the Street Outreach component only, not under the HP or RRH components.
Housing search and placement	Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
Case management	<p>Costs under Housing stability case management include: assessing (initial and periodic re-evaluations), arranging, coordinating, and monitoring the delivery of services to facilitate housing stability for participants.</p> <p>Mandatory services:</p> <ol style="list-style-type: none"> 1. Monthly meetings, unless prohibited by Violence Against Women Act (VAWA) or Family Violence and Prevention Services Act (FVPSA), and 2. Housing stability planning to assist participant retain permanent housing post-ESG assistance. <p>Limits: Cannot exceed 30 days during the period participant is seeking permanent housing and 24 months during the period participant is living in permanent housing.</p>
Mediation	Between participant and owner, only eligible if necessary to prevent loss of permanent housing.
Legal services	Must be necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the loss of permanent housing. May include landlord/tenant matters; child support; guardianship, paternity, emancipation, and legal separation; orders of protection and other civil remedies for victims of DV; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.
Ineligible legal services	Related to immigration and citizenship, or related to mortgages.
Credit repair Ineligible credit repair	Credit counseling and other services necessary to assist with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. The payment or modification of a debt.
Data Collection & Evaluation	
HMIS	<p>Recipients and subrecipients must enter data on all persons served and all activities assisted under ESG into the applicable community-wide Continuum of Care HMIS or comparable database (Victim Service Providers).</p> <p>Activities funded by ESG must comply with HUD's standards on participation, data collection and reporting under a local HMIS.</p> <p>See 576.107 for eligible activities.</p>

Recordkeeping & Reporting	
Recordkeeping Requirement	<p>Sufficient records must be established and maintained to demonstrate that ESG requirements are being met.</p> <p>Additional requirement to develop and implement written policies and procedures for recordkeeping that comply with the provisions established under CFR 24 Part 576.500 Recordkeeping and Reporting Requirements.</p>
Record retention period	<p>Documentation of participant eligibility and assistance provided must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.</p>
Reporting Requirements	<ul style="list-style-type: none"> • Monthly HMIS reporting requirements. HMIS report submission required for 5 years regardless of continued funding. • Must submit annual performance reports to HUD via Consolidated Annual Performance and Evaluation Reporting (CAPER).

RELEVANT REGULATIONS - § 576.500 RECORDKEEPING AND REPORTING

(a) In general. The recipient must have policies and procedures to ensure the requirements of this part are met. The policies and procedures must be established in writing and implemented by the recipient and its subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

(b) Homeless status. The recipient must maintain and follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS, or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

(1) If the individual or family qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in § 576.2, acceptable evidence includes a written observation by an outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

(2) If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition in § 576.2, because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following:

(i) Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or

(ii) Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

(3) If the individual or family qualifies as homeless under paragraph (2) of the homeless definition in § 576.2, because the individual or family will imminently lose their housing, the evidence must include:

(i)

(A) A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;

(B) For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or

(C) An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

(ii) Certification by the individual or head of household that no subsequent residence has been identified; and

(iii) Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

(4) If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in § 576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

(i) For paragraph (3)(i) of the homeless definition in § 576.2, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable;

(ii) For paragraph (3)(ii) of the homeless definition in § 576.2, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;

(iii) For paragraph (3)(iii) of the homeless definition in § 576.2, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a

written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and

(iv) For paragraph (3)(iv) of the homeless definition in § 576.2, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

(5) If the individual or family qualifies under paragraph (4) of the homeless definition in § 576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

(c) At risk of homelessness status. For each individual or family who receives Emergency Solutions Grant (ESG) homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the recipient or subrecipient. The evidence must also include:

(1) If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in §576.2:

(i) The documentation specified under this section for determining annual income;

(ii) The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2;

(iii) The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition. Acceptable evidence includes:

(A) Source documents (*e.g.*, notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of “at risk of homelessness” in § 576.2; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and

(iv) The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness” in § 576.2. Acceptable evidence includes:

(A) Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (*e.g.*, eviction notice, notice of termination from employment, bank statement);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of “at risk of homelessness”; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or

(2) If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in § 576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

(d) Determinations of ineligibility. For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

(e) Annual income. For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

(1) Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and

(2) Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (*e.g.*, wage statement, unemployment compensation statement, public benefits statement, bank statement);

(3) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or

(4) To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

(f) Program participant records. In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

(1) The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;

(2) Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at § 576.101 through § 576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and

(3) Where applicable, compliance with the termination of assistance requirement in § 576.402.

(g) Centralized or coordinated assessment systems and procedures. The recipient and its subrecipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

(h) Rental assistance agreements and payments. The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners

for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

(i) Utility allowance. The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

(j) Shelter and housing standards. The records must include documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports.

(k) Emergency shelter facilities. The recipient must keep records of the emergency shelters assisted under the ESG program, including the amount and type of assistance provided to each emergency shelter. As applicable, the recipient's records must also include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.

(l) Services and assistance provided. The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its subrecipients that are units of general-purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general-purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

(m) Coordination with Continuum(s) of Care and other programs. The recipient and its subrecipients must document their compliance with the requirements of § 576.400 for consulting with the Continuum(s) of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

(n) HMIS. The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its subrecipients.

(o) Matching. The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in § 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(p) Conflicts of interest. The recipient and its subrecipients must keep records to show compliance with the organizational conflicts-of-interest requirements in § 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in § 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

(q) Homeless participation. The recipient must document its compliance with the homeless participation requirements under § 576.405.

(r) Faith-based activities. The recipient and its subrecipients must document their compliance with the faith-based activities requirements under § 576.406.

(s) Other Federal requirements. The recipient and its subrecipients must document their compliance with the Federal requirements in § 576.407, as applicable, including:

(1) Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under §576.407(a), including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and the affirmative outreach requirements in § 576.407(b).

(2) Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 85 (for governments) and 24 CFR part 84 (for nonprofit organizations).

(3) Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.

(4) Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.

(t) Relocation. The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in § 576.408.

(u) Financial records.

(1) The recipient must retain supporting documentation for all costs charged to the ESG grant.

(2) The recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under § 576.101-§ 576.109 and the cost principles in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230).

(3) The recipient and its subrecipients must retain records of the receipt and use of program income.

(4) The recipient must keep documentation of compliance with the expenditure limits in § 576.100 and the expenditure deadline in § 576.203.

(v) Subrecipients and contractors.

(1) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under § 576.501.

(2) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24 CFR 84.40-84.48.

(3) The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

(w) Other records specified by HUD. The recipient must keep other records specified by HUD.

(x) Confidentiality.

(1) The recipient and its subrecipients must develop and implement written procedures to ensure:

(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;

(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

(iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

(2) The confidentiality procedures of the recipient and its subrecipients must be in writing and must be maintained in accordance with this section.

(y) Period of record retention. All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;

(2) Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and

(3) Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after

conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

(z) Access to records.

(1) Federal government rights. Notwithstanding the confidentiality procedures established under paragraph (w) of this section, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the ESG grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period but last as long as the records are retained.

(2) Public rights. The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.

(aa) Reports. The recipient must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. The recipient must also comply with the reporting requirements in 24 CFR parts 85 and 91 and the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in appendix A to 2 CFR part 170.