

State of Florida

2021 Annual Action Plan

Florida Department of Economic Opportunity

Small Cities Community Development Block Grant Program

Florida Department of Health

Housing Opportunities for Persons with AIDS Program

Florida Department of Children and Families

Emergency Solutions Grant Program

Florida Housing Finance Corporation

HOME Partnerships Program

National Housing Trust Fund (NHTF) Program

To be submitted to the U.S. Department of Housing and Urban Development (HUD)
DRAFT VERSION FOR PUBLIC COMMENT | JULY 20, 2021

Executive Summary

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

1. Introduction

The state of Florida is eligible to receive grant funds from the U.S. Department of Housing and Urban Development (HUD) to address housing and community development needs. These different grant funds include: Small Cities Community Development Block Grant (CDBG) Program, Housing Opportunities for Persons with AIDS (HOPWA) Program, Emergency Solutions Grant (ESG) Program, HOME Partnerships Program, and the National Housing Trust Fund (NHTF) Program. The funds are primarily meant for investment in the state's less populated and rural areas ("non-entitlement" areas), which do not receive such funds directly from HUD. The state of Florida's Consolidated Plan is for the five-year period from July 1, 2020, through June 30, 2025, covering HUD program years 2020-2024.

Each of the agencies listed below receive funds directly from HUD for the implementation and administration of the following programs:

- CDBG Program – the Florida Department of Economic Opportunity (DEO);
- HOPWA Program – the Florida Department of Health (DOH);
- ESG Program – the Florida Department of Children and Families (DCF); and
- HOME and NHTF Programs – the Florida Housing Finance Corporation (FHFC).

The state of Florida 2021 Annual Action Plan is for a one-year period from July 1, 2021, through June 30, 2022.

The Needs Assessment and Market Analysis sections of the Consolidated Plan determine the priority housing and non-housing development needs within the state. The Strategic Plan section describes the strategies that will be undertaken and the goals to be achieved to address the priority needs over the Consolidated Plan's five-year timeframe. An emphasis is placed on meeting priority needs based on housing, homelessness, HOPWA, and community and economic development projects that are eligible for funds through the programs administered by

the HUD-funded agencies. The Second-Year Action Plan describes the activities that will be undertaken in the second year (2021) to address the priority needs and make progress toward meeting the Strategic Plan goals.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

All HUD-funded projects must meet one of three National Objectives:

- Primarily benefit low- and moderate-income persons;
- Prevent or eliminate slum or blight; or
- Meet other community development needs that address an urgent need to existing conditions posing a serious and immediate threat to the health or welfare of the community and where other financial resources are not available to meet such needs.

The state of Florida’s strategic goals to address housing and community development needs with CDBG, HOME, ESG, HOPWA and NHTF include:

- Economic Development;
- Commercial Revitalization;
- Housing Rehabilitation (including workforce housing);
- Neighborhood Revitalization;
- Emergency Shelter and Street Outreach to People Experiencing Homelessness;
- Permanent Housing for People Experiencing Homelessness;
- Rental and Homeownership Activities through Community Housing Development Organizations (CHDOs);
- Housing and Supportive Services;
- Affordable Rental Housing (including affordable rental housing options specifically designated for extremely low-income and very low-income working households); and
- Affordable Homeownership Housing.

The highest priorities for the CDBG Program are the following:

- Job creation and sustainability;
- Flood and drainage (stormwater) improvements;
- Street and sidewalk improvements;
- Water line and treatment plan improvements; and
- Rehabilitation of low-income homes, including workforce housing, to meet local building code and Section 8 housing quality standards.

3. Evaluation of past performance

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

Over the past five years, the state of Florida has funded a variety of programs and activities with HUD block grants and continues to work to address the greatest housing, community, and economic development needs in the state. Florida intends to continue these successful programs and activities during the current planning period of 2020-2024.

As required by HUD, the state must submit a Consolidated Annual Performance and Evaluation Report (CAPER) each year in September. The CAPER details funding expenditures for a given program year and compares actual performance outcomes to those proposed in the Action Plan. Collectively, the 2019 Action Plan expenditures served 44,059 residents, 250 households, and generated 1,907 housing units, exceeding most annual targets for CDBG, HOME, ESG and HOPWA funding for the program year.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Florida followed its Citizen Participation Plan during the development of the 2021 plan. A notice was published in the Florida Administrative Register (FAR) announcing the public comment period and public hearing: [TO BE UPDATED AFTER PUBLIC COMMENT PERIOD].

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

[TO BE UPDATED AFTER PUBLIC COMMENT PERIOD].

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

[TO BE UPDATED AFTER PUBLIC COMMENT PERIOD].

7. Summary

The needs are:

- Community development, economic development and housing rehabilitation projects, including workforce housing in the communities that receive funding through the CDBG Program;
- Financial and supportive assistance to persons with HIV/AIDS to help with housing costs to prevent homelessness through the HOPWA Program;
- New affordable housing, homebuyer or rental assistance through the HOME Program;
- Assistance for individuals experiencing homelessness, including funding for the operation and maintenance of emergency shelters through the ESG Program; and
- Extremely low-income and very low-income units for persons and households with special needs, or who are homeless or at-risk of homelessness through the NHTF Program.

Many of these needs have been exacerbated by the impacts of the ongoing public health crisis due to COVID-19. The state will continue to address those needs through CARES Act funds as allocated and through regular HUD allocations when possible.

In addition, the state continues to experience disaster-related needs, which are being addressed through the CDBG-DR and CDBG-MIT programs. More information on these programs is available on the Office of Long-Term Resiliency website: <https://floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative>.

PR-05 Lead & Responsible Agencies - 91.300(b)

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

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
Lead Agency	Florida	Department of Economic Opportunity (DEO)
CDBG Administrator	Florida	Department of Economic Opportunity (DEO)
HOPWA Administrator	Florida	Department of Health (DOH)
HOME Administrator	Florida	Florida Housing Finance Corporation (FHFC)
ESG Administrator	Florida	Department of Children and Families (DCF)
HOPWA-C Administrator	Florida	Department of Health (DOH)
HTF Administrator	Florida	Florida Housing Finance Corporation (FHFC)

Table 1 – Responsible Agencies

Narrative

The following are the individual representatives for the above listed agencies:

Consolidated Plan Public Contact Information

Cheryl Urbas, DOH, HOPWA, cheryl.urbas@flhealth.gov

Nicole Gibson, FHFC, HOME and NHTF, nicole.gibson@floridahousing.org

Shaurita Jackson, DEO, Small Cities CDBG Program, cdbg@deo.myflorida.com

Tera Bivens, DCF, ESG, tera.bivens@myflfamilies.com

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

As part of the consolidated planning process, the state reached out to thousands of stakeholders statewide to communicate about the plan, process, and opportunities for participation. More than 200 stakeholders participated in a survey for the Consolidated Plan, which included a variety of housing providers, health, mental health, and service agencies. Additional details are included in the Citizen Participation Appendix.

Ongoing efforts to enhance coordination among housing providers and service agencies occur through the state's existing "Link Strategy." Developers receiving financing through a number of FHFC's affordable rental development programs must reserve a small portion of units for tenants referred by an approved supportive services agency working in the community where the property is located. Populations served through this strategy include homeless persons and persons with special needs (including persons with disabilities, survivors of domestic violence, and youth aging out of foster care). Properties financed with NHTF Program funding will also be required to implement this approach with the addition of those at-risk of homelessness being able to be served. FHFC is working with other state agencies to implement this strategy.

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 HOPWA Program contractually requires each sub-recipient to designate a representative to participate in the local homelessness planning process and provide local homelessness advocates with information about HOPWA as needed.

The DCF Office on Homelessness works closely with 27 Continuums of Care (CoCs) to address the needs of different homeless populations throughout the state. The populations served include families with children, individuals with substance abuse or mental health needs, domestic violence survivors, chronically homeless, and youth exiting the foster care system. Through an annual budgeting process, state funding may also be appropriated to support the operation of the continuums to ensure local planning, data collection and grant writing capacity to enable our communities to continue to access federal housing grants to re-house the state's chronic, long-term homeless population and support those at risk of homelessness.

DEO and FHFC sit on the Council on Homelessness along with a number of other state agencies and stakeholders to discuss homeless housing and service issues. FHFC uses its seat on the council to seek input on program ideas, including the use of Low Income Housing Tax Credits and state or HOME funding for permanent supportive housing developments to serve homeless persons, a "rapid re-

housing” approach with short-term tenant-based rental assistance and the use of forgivable state loans in rural areas working with CoCs to finance smaller, scattered site properties for chronically or situational homeless households. The council provides an important opportunity to discuss how the corporation can support the CoC work to serve homeless people throughout the state.

Describe consultation with the Continuum(s) of Care that serves the State 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 DCF Office on Homelessness gathers input from CoCs and the Council on Homelessness regarding performance standards and outcome measures for all funding. This information is used in shaping the use of funds available to the HUD-designated CoC lead agencies. CoCs are encouraged to develop projects that meet the local needs of their communities and that align with federal regulations.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Department of Economic Opportunity (State Of Florida)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Strategic Plan and Action Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lead agency on development of Plan; contributed to all elements of the plan and facilitated outreach to additional stakeholders.
2	Agency/Group/Organization	FLORIDA HOUSING FINANCE CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Strategic Plan and Action Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Contributed to all elements of the plan and facilitated outreach to additional stakeholders.
3	Agency/Group/Organization	Florida Department of Health-Central
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Strategic Plan and Action Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
4	Agency/Group/Organization	Florida Department of Children and Families
	Agency/Group/Organization Type	Services-Children Services-Homeless Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Strategic Plan and Action Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Contributed to all elements of the plan and facilitated outreach to additional stakeholders.
5	Agency/Group/Organization	Stakeholder Survey
	Agency/Group/Organization Type	A wide range of stakeholders from services, industries, and other providers

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy</p>
<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Online survey conducted specifically for the Consolidated Plan including questions on current needs, market, conditions, goals, strategies, priorities, and institutional infrastructure. This survey had nearly 200 total stakeholder respondents.</p>

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

None; all relevant organizations and agencies were invited to participate in the process. DEO, FHFC, DCF and DOH utilized electronic listserv notifications that reach more than 3,000 stakeholders and residents to encourage participation in the survey, virtual engagement site and public hearings.

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?
Continuum of Care	N/A	CoCs and the State Office on Homelessness closely follow federal policy and work to align efforts in ending homelessness that match the federal strategic plan to end homelessness.
Local Comprehensive Plan	Department of Economic Opportunity	CDBG applications must include provisions from the local comprehensive plan demonstrating that the proposed activity is not inconsistent with the comprehensive plan.
CDBG Disaster Recovery Action Plans	Department of Economic Opportunity	CDBG-DR Action Plans for hurricanes Hermine, Matthew, Michael, and Irma are referenced as appropriate and align with strategic housing and redevelopment efforts covered in the Consolidated Plan.
Florida's Strategic Plan for Economic Development	Department of Economic Opportunity	Economic development goals align with strategic CDBG economic development goals.
Florida Housing Finance Corporation Strategic Plan	Florida Housing Finance Corporation	FHFC Strategic Plan aligns with HOME and NHTF affordable housing goals.
2019 Consolidated Annual Performance Evaluation Report	Department of Economic Opportunity	Strategic Plan goals build on the previous CAPER goals but adapt and refine them to the current needs of the community.

Table 3 - Other local / regional / federal planning efforts

Narrative

None.

AP-12 Participation - 91.115, 91.300(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

Despite restrictions on large in-person gatherings during the development of the Consolidated Plan (due to the COVID-19 pandemic), residents and stakeholders had many opportunities to participate in the development of the Consolidated Plan:

- Nearly 200 stakeholders participated in an online survey about housing and community development needs in the areas they work and live.
- Resident engagements were conducted online in the form of “Needs Assessment Forums” to encourage safe participation in the Consolidated Plan and Action Plan development to the COVID-19 outbreak. These online forums provide opportunities to inform the public about the process and gather resident and stakeholder perspectives on needs. The dedicated online engagement platform (<http://florida.housingimpactlab.com/>) was open for residents to participate from August 22 to September 30, 2020. A total of 27 residents/stakeholders participated in the engagement activities on the site.

Five public hearings were open to all residents and were conducted online via webinar format. These hearings were conducted on August 14, September 15, September 17, October 20, and October 28, 2020.

Add language specific to Action Plan Citizen Participation after the public comment period.

Citizen Participation Outreach

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	Public Meeting	Non-targeted/broad community		See Citizen Participation Appendix.	N/A; all comments are accepted.	

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)

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The table below lists the resources anticipated to be available to assist the State in fulfilling its Annual action and five-year Consolidated Plan goals.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				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 Public Improvements Public Services	27,176,928	188,476	14,296,970	41,662,374	86,249,856	The annual allocation and any program income or prior year resources will be allocated to eligible CDBG categories per 24 CFR 570.200-570.207
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	19,390,793	12,000,000	0	31,390,793	60,800,000	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR 92

HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	8,364,929	0	0	8,364,929	32,196,164	The annual allocation and any program income or prior year resources will be allocated to eligible HOPWA categories per 24 CFR 574
ESG	public - federal	Street Outreach Emergency shelter Rapid Re-housing Homelessness Prevention Admin HMIS Activities	5,954,259	0	0	5,954,259	23,817,036	The annual allocation and any program income or prior year resources will be allocated to eligible ESG categories per 24 CFR 576.101-576.107

HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	35,072,600	0	0	35,072,600	22,412,124	The annual allocation will be allocated to eligible HTF categories per 24 CFR 93.
ESG-CV2	Public-federal	Street Outreach Emergency shelter Rapid Re-housing Homelessness Prevention Admin HMIS Activities	NA	NA	NA	\$65,511,297	\$65,511,297	Funds for COVID response

Table 5 - Expected Resources – Priority Table

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

The CDBG Program requires matching funds for amounts expended on Administration in excess of \$100,000. CDBG match contributions are met with State trust fund dollars.

The HOME Program requires participating jurisdictions to provide match funds in an amount equal to no less than 25 percent of the total HOME funds drawn down for project costs. Match is a permanent contribution to affordable housing. However, match is not leveraging. Match is the participating jurisdiction's contribution to the HOME Program the local, non-federal contribution to the partnership.

The federal ESG Program requires matching contributions to supplement the recipient's ESG program in an amount that equals the recipient's fiscal year grant for ESG. However, 24 CFR § 576.201 (a)(2) states that "If a recipient is a state, the first \$100,000 of the fiscal year grant is not required to be matched. However, the recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions." DCF requires monthly reports from CoCs that outlines the matching contributions for expenditures. The types of acceptable matching contributions include cash contributions and noncash contributions such as the value of real property, equipment, goods and services contributed to the program. Match requirements do not apply to ESG-CV program funds.

Neither the federal nor the state HOPWA Programs require match contributions to be leveraged toward funding allocations.

The NHTF Program does not require matching funds; instead NHTF Program funds will be made available in tandem with other affordable financing, which may include Multifamily Mortgage Revenue Bonds, Low Income Housing Tax Credits, State Apartment Incentive Loan Program (SAIL) or HOME Investment Partnerships program funds, as part of a comprehensive annual funding plan adopted by FHFC's Board of Directors. NHTF Program funding will assist in creating financing opportunities with some or all the programs listed here to enable assisted units to serve more extremely low-income and very low-income residents than could be done by each program separately.

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

Land owned by the local government can be used for leverage in the Small Cities CDBG program. In addition, land donated or provided at below market value to a developer receiving HOME funds will lower the overall cost of affordable housing development.

Discussion

The anticipated resources expected to be allocated toward eligible HUD funded program activities and projects will be used toward priority areas that have been identified by each funding program in the current planning years 2020-2024. Other resources available from other funding sources are encouraged to supplement HUD funded activities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Economic Development	2020	2024	Non-Housing Community Development	STATEWIDE	Job Creation	CDBG: \$7,442,277	Jobs Created/Retained: 55
2	Commercial Revitalization	2020	2024	Non-Housing Community Development	STATEWIDE	Commercial Revitalization	CDBG: \$1,637,301	Public Facility or Infrastructure Activities other than Low/Moderate-Income Housing Benefit: 840 Persons Assisted
3	Housing Rehabilitation	2020	2024	Affordable Housing	STATEWIDE	Housing Rehabilitation Affordable Rental Housing Affordable Ownership Housing	CDBG: \$6,201,898	Homeowner Housing Rehabilitated: 145 Household Housing Units
4	Neighborhood Revitalization	2020	2024	Non-Housing Community Development	STATEWIDE	Neighborhood Revitalization	CDBG: \$9,526,115	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5800 Persons Assisted
5	Emergency Shelter and Street Outreach	2020	2024	Homeless	STATEWIDE	Street Outreach to Homeless Persons and Emergency Shelters	ESG: \$3,572,555	Homeless Person Overnight Shelter: 2000 Persons Assisted
6	Permanent Housing for Homeless Persons	2020	2024	Affordable Housing	STATEWIDE	Homeless Prevention and Rapid Rehousing	ESG: \$2,381,704	Housing for Homeless added: 1050 Household Housing Unit
7	Rental and Homeownership Activities (CHDOs)	2020	2024	Affordable Housing	STATEWIDE	Affordable Rental Housing Affordable Ownership Housing	HOME: \$2,908,619	Other: 25 Household Housing Unit

8	Affordable Homeownership Housing	2020	2024	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$5,000,000	Homeowner Housing Added: 130 Household Housing Unit
9	Affordable Rental Housing	2020	2024	Affordable Housing Non-Homeless Special Needs	STATEWIDE	Affordable Rental Housing	HOME: \$11,482,174	Household Housing Unit: 100 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted
10	Affordable Rental Housing for Extremely Low Income and very low-income Households	2020	2024	Affordable Housing Non-Homeless Special Needs	STATEWIDE	Affordable Rental Housing	HTF: \$35,072,600	Rental units constructed: 125 Household Housing Units

11	Housing and Supportive Services	2020	2024	Affordable Housing Non-Homeless Special Needs	STATEWIDE	Short Term Rent, Mortgage and Utility Payments Permanent Housing Placement Assistance Tenant Based Rental Assistance Resource identification services Housing information services Case management and other supportive services Short-term supported housing	HOPWA: \$8,364,929	Tenant-based rental assistance / Rapid Rehousing: 240 Households Assisted Homelessness Prevention: 1,500 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Economic Development
	Goal Description	Economic Development subgrants assist communities through the creation or retention of jobs primarily for persons from low-to-moderate income households. An Economic Development project must meet a national objective by creating or retaining jobs of which at least 51 percent are for persons from low- to moderate-income households, or which meet the criteria contained in 24 CFR 570.483(b)(4)(iv) and (v), or by providing goods and services to an area with a primarily low- to moderate-income clientele.

2	Goal Name	Commercial Revitalization
	Goal Description	Commercial Revitalization activities are designed to revitalize commercial areas, which serve primarily low- and moderate-income persons, or to meet the National Objective of preventing or eliminating slum or blight. Goal outcome indicators not listed for commercial revitalization include parking improvements, streetscaping, public facilities, and building rehabilitation.
3	Goal Name	Housing Rehabilitation
	Goal Description	The primary objectives of the Housing Rehabilitation category are to improve housing conditions for low- and moderate-income persons, including workforce housing.
4	Goal Name	Neighborhood Revitalization
	Goal Description	The primary objective of the Neighborhood Revitalization category is to preserve and revitalize declining, primarily residential, low- and moderate-income service area neighborhoods by addressing the major infrastructure problems contributing to such decline. Neighborhood Revitalization grants assist communities with basic community development needs, including infrastructure, for low-income citizens in residential neighborhoods.
5	Goal Name	Emergency Shelter and Street Outreach
	Goal Description	The ESG Program funding will enable DCF to provide emergency shelter facilities, including domestic violence facilities, throughout the state. It will also assist unsheltered homeless individuals and families with locating an emergency shelter or housing, case management needs, transportation, emergency health services, and emergency mental health services in the respective CoCs throughout Florida. The programs will be carried out by local CoC lead agencies as a collaborative effort to coordinate area providers of service. Funding levels for both outreach and shelters shall not be more than 60 percent of ESG Program awards.
6	Goal Name	Permanent Housing for Homeless Persons
	Goal Description	The ESG Program goals will be carried out by local CoC lead agencies as a collaborative effort to coordinate area providers of service in accordance with local CoC Plans. Funding levels for permanent housing activities (prevention and rapid re-housing) will equal the balance of the ESG Program awards not used on Street Outreach, Emergency Shelter, HMIS and Administrative Costs.

7	Goal Name	Rental and Homeownership Activities (CHDOs)
	Goal Description	The HOME Program, administered by FHFC, allocates annual funding allocation to rental and homeownership activities sponsored by qualified Community Housing Development Organizations (CHDOs). The funding can be used for new construction, rehabilitation, rental assistance or down payment assistance activities.
8	Goal Name	Affordable Homeownership Housing
	Goal Description	The HOME Program funds affordable homeownership housing either through the RFA process or through a reservation process. Funding can be used for homebuyer assistance activities, such as down payment assistance and construction activities.
9	Goal Name	Affordable Rental Housing
	Goal Description	The HOME Program funds affordable rental housing for low income households through the RFA process. Funding can be used for activities such as construction, rehabilitation and rental assistance for low- and moderate-income households.
10	Goal Name	Affordable Rental Housing for Extremely Low Income and Very Low-Income
	Goal Description	The NHTF Program, administered by FHFC, funds affordable rental housing for extremely low income (ELI) and very low-income (VLI) households through the RFA process. Funding may be used for activities including construction, demolition, acquisition of real property, related soft costs and operating cost reserves funded with operating assistance.
11	Goal Name	Housing and Supportive Services
	Goal Description	The HOPWA Program, administered by DOH, funds activities carried out by the project sponsors throughout Florida, including financial assistance in the form of short-term rent, mortgage and utility (STRMU) payments; permanent housing placement assistance; tenant based rental assistance; resource identification services; housing information services; case management and other supportive services; short-term supported housing assistance; facility-based housing development and preservation; facility-based housing operations activities; transitional housing; and administrative services for persons with HIV/AIDS.

13	Goal Name	
	Goal Description	

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The following chart reflects the planned percentage distribution of the FFY 2021 CDBG, ESG, HOME, NHTF, and HOPWA programs. Additionally, this section is a description of how the allocation distribution was determined and how the allocation distribution will address the priority needs and goals determined in the Strategic Plan portion of the Consolidated Plan.

Funding Allocation Priorities

Program	Goals													
	ED (%)	CR (%)	HR (%)	NR (%)	Emergency Shelter and Street Outreach (%)	Permanent Housing for Homeless Persons (%)	Rental and Homeownership Activities (CHDOs) (%)	Affordable Homeownership Housing (%)	Affordable Rental Housing (%)	Affordable Rental Housing for Extremely Low Income & Very Low-Income (%)	Housing and Supportive Services (%)	Disaster Recovery (%)	Coronavirus Response and Recovery (%)	Total (%)
CDBG	30	6.6	25	38.4	0	0	0	0	0	0	0	0	0	100
HOME	0	0	0	0	0	0	15	25	60	0	0	0	0	100
HOPWA	0	0	0	0	10	0	0	0	0	0	90	0	0	100
ESG	0	0	0	0	60	40	0	0	0	0	0	0	0	100
HTF	0	0	0	0	0	0	0	0	0	100	0	0	0	100

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

The percentages, described in the table above, place an emphasis or priority on the types of projects that will be funded for each of the five HUD-funded grant programs described in the 2020-2024 Consolidated Plan.

For the CDBG program, if the number of applications received are insufficient to fully utilize all funds allocated to a category, the balance of the funds in that category can be reallocated to another category receiving more applications than there are funds available. Also, grant category funding levels may be increased and/or decreased by reallocated funds. In addition, funds may be reallocated to address recovery needs related

to the COVID-19 pandemic.

Similarly, for the HOME Program, if the applications received are insufficient to fully utilize all funds allocated to a category, the balance of funds in that category may be reallocated to another category receiving more applications than there are funds available. Funding in each category may be increased and/or decreased by reallocated funds.

The allocation percentages for each individual grant program were determined based on the needs presented in the needs assessment section of the 2020-2024 Consolidated Plan, the comments and survey responses received during the citizen participation process conducted during the development of the Consolidated Plan and the NHTF Allocation Plan and applications received in the past. For the HOPWA Program, the types of housing and supportive services will be based on financial and programmatic requirements in accordance with HUD-eligible activities delivered by local project sponsors. For the ESG Program, the types of projects will be in accordance with HUD-eligible activities carried out by the local CoC lead agencies and administered by DCF.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

Performance objectives for communities served by the CDBG program are entered into the U.S. Department of Housing and Urban Development's (HUD) Integrated Disbursement Information System (IDIS) when awards are made, and the final accomplishments and beneficiaries are reported when projects are completed. The composite objectives of subgrantees comprise the state's overall objectives. The CDBG program will address three primary objectives with its federal fiscal year (FFY) 2021 allocation:

1. Creating economic opportunities;
2. Creating a suitable living environment; and
3. Providing affordable housing, including workforce housing.

These objectives will result in four major outcomes:

1. Improve the local economy;
2. Reduce poverty through job creation;
3. Improve neighborhoods; and
4. Improve sustainability by providing suitable workforce housing and promoting viable communities.

In preparing their CDBG applications, local communities hold public meetings to determine their community's priority needs, and then prepare and submit an application for funding in one of the four funding categories. Therefore, specific performance objections can only be determined when the applications are received, scored, and a grant is awarded.

The ESG Program will address three primary objectives with its FFY 2021 allocation:

1. Increase street outreach to homeless persons (especially unsheltered),
2. Increase availability of emergency shelters and transitional housing to homeless persons (especially families with children), and
3. Increase the availability of homeless prevention services to persons and families at risk of homelessness.

The HOME Program will address three primary objectives with its FFY 2019 allocation:

1. Increase rental through CHDOs for persons and families at, or below, 60 percent area median income (AMI),
2. Increase affordable rental housing activities through construction of new rental housing units or through tenant-based rental assistance for persons and families at or below 60 percent AMI, and
3. Increase affordable ownership housing activities through direct financial assistance to homebuyers at or below 80 percent AMI.

The state HOPWA Program will address three primary objectives with its FFY 2019 allocation:

1. Establish or better maintain a stable living environment
2. Reduce the risk of homelessness among people living with HIV/AIDS and their families
3. Transition homeless individuals or families into stable housing as well as create a strategy for long-term housing stability for persons living with HIV/AIDS.

The NHTF Program will address one primary objective with its FFY 2019 allocation: to increase affordable rental housing activities for extremely low-income households, with a preference for those who are homeless, at risk of homelessness and/or have special needs.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

This section of the FFY 2021 Annual Action Plan describes how each annual allocation of CDBG, ESG, HOME, NHTF, and HOPWA program funds will be distributed geographically throughout Florida.

Distribution Methods

Table 8 - Distribution Methods by State Program

1	State Program Name:	Florida Emergency Solutions Grant Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	<p>The ESG Program is a formula grant program based upon the demographics of Florida’s counties and cities. The state receives grant funds directly from HUD and will sub-grant the ESG funds to CoC designated lead agencies to carry out activities consistent with their local CoC Plans. Eligible beneficiaries must meet the “homeless” definition in 24 CFR § 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR § 576.104. HUD established alternative requirements and waived section 415(a)(4) and (5) of the McKinney-Vento Homeless Assistance Act and 24 CFR 576.104 to the extent necessary to provide additional flexibility for recipients and subrecipients administering rapid re-housing assistance with ESG funds under the CARES Act. This waiver is provided in notice CPD-21-05 dated April 14, 2021 which also provides flexibility to habitability inspections.</p> <p>Lead agencies may sub-contract with local governments and nonprofits to provide ESG activities in their respective areas. Funding for local projects will be determined by the lead agencies.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Grant applications in state FY19-20 were awarded on a three-year grant cycle. The award distribution follows guidelines set forth in the solicitation as described in previous years' action plans. Recurring funds are made available based on initial grant awards from the statewide solicitation process in FY19-20 and the receipt of funding from HUD.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to ESG</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The ESG Program will receive a total allocation of \$5,954,259 in funding for federal fiscal year 2021. DCF will require local lead agencies follow federal regulations and spend no more than 60% on Street Outreach and Emergency Shelter combined. Additionally, CoCs may spend no more than 5 percent of awarded funds on administrative costs. The types of services funded include: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and Homeless Management Information System costs among the 27 CoC agencies to provide services consistent with the CoC plans to address homelessness. The Office on Homelessness maintains for its administrative costs, the remaining balance allowed under 24 CFR 576.100 for the administration of ESG and the provision of technical assistance to service providers and local CoCs.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to ESG.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The ESG Program will receive a total allocation of \$5,954,259 in funding for federal fiscal year 2021. DCF will require local lead agencies follow federal regulations and spend no more than 60% on Street Outreach and Emergency Shelter combined. Additionally, CoCs may spend no more than 5 percent of awarded funds on administrative costs. The types of services funded include: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and Homeless Management Information System costs among the 27 CoC agencies to provide services consistent with the CoC plans to address homelessness. The Office on Homelessness maintains for its administrative costs, the remaining balance allowed under 24 CFR 576.100 for the administration of ESG and the provision of technical assistance to service providers and local CoCs</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The maximum award amount for any lead agency is \$400,000 with a maximum 5 percent administration budget. The lead agencies will plan and coordinate activities within their local area that are consistent with CoC plans. Sub-providers of services will be local governments and nonprofit organizations and their threshold funding amounts will be decided by the lead agencies and approved by the Office on Homelessness.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The anticipated outcome measures for the ESG Program are based on the number of homeless service providers and shelters that receive funding assistance, the number of individuals who benefit from emergency shelter assistance, the number of individuals who receive rapid rehousing assistance, the number of individuals who maintain permanent housing and the number of individuals who are remain stably housed in incremental months after receiving assistance.</p>
<p>2</p>	<p>State Program Name:</p>	<p>Florida HOME Investment Partnership Program</p>
	<p>Funding Sources:</p>	<p>HOME</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>HOME funds are allocated to provide necessary financial support for various activities, creating long-term affordable, safe, decent and sanitary housing for very low- and low-income persons and households. FHFC works with both the public and private sector throughout the state to assist in meeting the needs of affordable housing, particularly in rural areas when development capacity exists. FHFC distributes HOME funds either through a RFA process, a Request for Qualifications (RFQ) process, a reservation system, or demonstration projects.</p>
	<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Application selection criteria for the HOME Program varies based upon the type of funding priority determined by FHFC for allocation distribution and amount of funding available to achieve funding priorities determined by FHFC. For example, scoring criteria for larger scale rental development priority projects would be based on level of experience of the applicant with implementation of HOME funds and Davis-Bacon federal requirements and the amount of funding available as leverage to the project. However, FHFC uses a different scoring criteria for smaller scale rural projects that are unable to provide leverage funds to a project and instead base priority funding projects by level of experience or need, and past project performance.</p>

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to HOME.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to HOME.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to HOME.</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>The HOME Program will receive a total allocation of \$19,390,793 in funding for FY 2021. Of the total funding allocation, 15% will be reserved for developments sponsored by qualified Community Housing Development Organization (CHDO) applicants. In the event insufficient applications meeting the threshold are received to allocate the anticipated amount to rental developments, the remaining unallocated funds may be shifted to homeownership activities. The same applies to homeownership activities, so the remaining unallocated funds may be shifted to rental activities. The remaining funds allocated will be awarded via the RFA/RFQ process or a reservation system based on the appropriate rule chapters, or through one or more demonstration projects that create affordable rental and homeownership opportunities through construction or rehabilitation of housing units or through direct homebuyer or rental assistance. Ten percent of the total annual allocation will be used by FHFC for administrative costs pursuant to 24 CFR § 92.207.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The grant size limits imposed by FHFC for the RFA/RFQ process(es) each year are based on the size of the project and the type of priority criteria scoring determined by FHFC HOME Program staff.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The HOME Program performance outcomes are based on how many affordable homeownership and rental housing units are constructed or rehabilitated and how many low- and moderate-income beneficiaries receive purchase assistance or rental assistance. In 2021, it is expected that the HOME Program will finance construction or rehabilitation of 255 affordable housing units- and rental assistance for affordable rental housing for 50 households.</p>
<p>3</p>	<p>State Program Name:</p>	<p>Florida Housing Opportunities for Persons With AIDS (HOPWA) Grant Program</p>
	<p>Funding Sources:</p>	<p>HOPWA</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The State HOPWA Program may receive a total allocation of \$8,364,929 in funding for fiscal year 2021. Of the total funding allocation, 97% of the grant award will be spent to benefit eligible persons whose income does not exceed 80 percent of the median family income for the area served. Eligible activities include rental payments, security deposits, and utility allowances to promote housing opportunities for persons with HIV/AIDS. The remaining 3% of the funding will be spent on administrative activities carried out by DOH.</p> <p>DOH currently contracts with 10 project sponsors to administer the State HOPWA - Program in designated geographic areas, the majority of which are rural. The state program provides funds for HOPWA services in 52 of Florida’s 67 counties, which includes the EMSA re-designations administered by the state. The remaining 15 counties are served by six EMSAs that receive funding directly from HUD.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The priority of applications is determined by how many low- and moderate-income beneficiaries with HIV/AIDS will be served and the past performance of the project sponsor that is requesting funds.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to HOPWA.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to HOPWA.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>A minimum of 97% of the state HOPWA grant award will be allocated statewide to project sponsors to provide eligible services and activities for the state program. These project sponsors are local community organizations and county health departments. In order to ensure that the state pays a fair and reasonable price for the services to be provided and to enhance quality, availability and collaboration within the state housing program, DOH drafted a Request for Proposal (RFP) for six years from 2016 to 2022.</p> <p>Funds were allocated within each geographical area in accordance with the methodology described above. EMSA funds re-designated to the State HOPWA Program will be administered by DOH in the same manner and for the same activities as the State HOPWA Program.</p> <p>The State HOPWA Program currently has, five community-based organizations, three county health departments, and two planning councils as HOPWA project sponsors providing services either directly or via subcontracts.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Florida distributes funds annually based on the cumulative number of persons living with HIV or AIDS cases in the geographical service areas. In addition, allocations are based on utilization rates and available funds. The allocation methodology is reviewed periodically, and DOH takes recommendations into account while making final annual allocation decisions. The six EMSAs in the state that qualify for direct HOPWA funding from HUD may be eligible to receive State HOPWA Program funds only when funds exist beyond the amount required to meet 100% of the need of the state program service areas.</p>

<p>Describe threshold factors and grant size limits.</p>	<p>The State HOPWA Program does not require specific threshold factors or grant size limits for annual allocation distribution to project sponsors. Instead, the program determines annual allocation amounts based on budgets submitted by the project sponsors, and the percentage of beneficiaries anticipated to be served by the grant funded projects and activities. The State HOPWA Program makes the final funding allocation determination based on the feasibility of the project sponsor’s budget proposal and amount of funding available to be distributed statewide.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The anticipated outcome measures for the State HOPWA Program are based on the number of persons with HIV/AIDS that receive financial assistance from project sponsors in the form of short-term rent, mortgage, and utility (STRMU) payments, tenant-based rental assistance (TBRA), permanent housing placement (PHP), short-term transitional assistance, resource identification, comprehensive housing case management and other supportive services, and other eligible housing services as per the State HOPWA Program goals and priorities.</p>
<p>4 State Program Name:</p>	<p>Florida Small Cities Community Development Block Grant Program</p>
<p>Funding Sources:</p>	<p>CDBG</p>

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>DEO receives an annual allocation from HUD to administer the Small Cities CDBG program. DEO publishes a Notice of Funding Availability (NOFA) in the Florida Administrative Register prior to the opening of the annual funding cycle. This NOFA informs Florida residents of the availability of CDBG funding, the amount of funding available, the program categories under which they can apply, and the opening and closing date of the funding cycle.</p> <p>When DEO receives notification of the annual allocation, the Small Cities CDBG planning manager reviews the allocation and makes recommendations for funding based on previous allocations and distributions, expected application submissions, and DEO priorities. For FFY 2020, this included CDBG program funding to prevent, prepare for, and respond to coronavirus. The recommendations are then reviewed by the Small Cities and Rural Communities bureau chief and are approved or revised.</p> <p>Deobligated funds and program income funds sometimes become available during the federal fiscal year. If emergency set-aside funds, deobligated funds, and/or program income funds become available, the planning manager and bureau chief meet to determine how to allocate these funds. The funds can be used for COVID-19 response needs that were not met in the CDBG-CV cycles to fund unfunded applications from the current funding cycle or economic development projects on the funding reservation list.</p> <p>Neighborhood revitalization, housing rehabilitation, and commercial revitalization subgrants are awarded on a competitive basis. Economic Development subgrants are awarded on a competitive basis if the CDBG program receives more funding requests than there are funds available. Otherwise, eligible economic development projects are awarded on a first-come, first-served basis.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The funding categories for the CDBG program are established by state law. The percentage of funds allocated for each category are determined based on public meetings, comments received on the Consolidated Plan and the annual action plan, and past funding experience. The percentage of funds allocated to each category may be revised to ensure state compliance with HUD requirements for the timely award of funds. The criteria used for reviewing funding applications are outlined in federal regulations, state statutes, the program’s administrative rules, application manual, and the Consolidated Plan.</p> <p>Upon receipt of an application, an initial review is conducted to determine if threshold criteria have been met. This review is used as a screening method to ensure compliance with minimum application requirements and to ensure that applications from communities that are not in compliance with federal or state laws are not funded. Seven specific criteria established in Section 290.0475, Florida Statutes, establish the basis upon which DEO may reject an application without regard to scoring:</p> <ol style="list-style-type: none"> 1. The application is not received by the specified deadline date; 2. The proposed project activities fail to meet one of the three national objectives contained in federal and state legislation; 3. The proposed activities are not eligible under federal legislation; 4. The proposed activities are not in compliance with the adopted local comprehensive plan, as approved by DEO; 5. The applicant has an open CDBG, except as provided in § 290.046(2)(b) and (c), F.S. and department rules; 6. The local government is not in compliance with citizen participation requirements; <p>and</p>
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	<p>7. Information provided in the application that affects eligibility or scoring is misrepresented.</p> <p>DEO does not award a grant until it has determined, based upon a site visit, that the project and/or activities are eligible in accordance with the description contained in the application, and that any open economic development grant is on time. If DEO determines after an application site-visit that any information in the application that affects scoring has been misrepresented, the application is rejected.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The CDBG program is established in Sections 290.0401 through 290.048, Florida Statutes, and administered through Chapter 73C-23, Florida Administrative Code (F.A.C.). The statute and administrative code contain guidelines for who can apply for CDBG funding, the application process, and how the applications are scored and ranked. The CDBG application form, which is incorporated into the administrative rule by reference, gives the specific scoring criteria for the economic development, neighborhood revitalization, housing rehabilitation and commercial revitalization applications. The application form can be downloaded from the DEO/CDBG webpage: http://www.floridajobs.org/CDBGApplicantInfo. Information to be included in the application can be found on the HUD website, the CDBG website, and generated during the application process.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to CDBG.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to CDBG.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Funding amounts are assigned to each funding category based on a need evaluation. For the FFY 2021 funding cycle, it was determined that there was higher demand and need for neighborhood revitalization category projects throughout the state. That determination was made based on the amount of applications that were received, but left unfunded from the prior federal fiscal year. The remaining funding categories were assigned percentages based on the number of applications submitted in the prior funding cycle, and based on the goals and objectives that were chosen as priority needs and goals from the needs assessment and market analysis sections of the 2020-2024 Consolidated Plan.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The local governments' low- and moderate-income (LMI) population determines the maximum amount of funds for which they can apply. Population groupings are based on HUD modified census figures summarizing low- and moderate-income population as the following chart shows:</p> <p>LMI Population Subgrant Ceiling</p> <ul style="list-style-type: none"> • 1 – 499: \$600,000 • 500 – 1,249: \$650,000 • 1,250 – 3,999: \$700,000 • 4,000 – and above: \$750,000 <p>Economic Development subgrants: \$1,500,000.</p>

	What are the outcome measures expected as a result of the method of distribution?	The anticipated outcome measures for the CDBG program are based on the number and type of applications received from eligible sub-grantees in the four eligible categories (neighborhood revitalization, commercial revitalization, housing rehabilitation, and economic development). Outcome measures for these programs include the number of housing units rehabilitated; number of linear feet of sewer lines, water lines, street paving and sidewalks completed; number of buildings receiving façade improvements; number of low- to moderate-income beneficiaries; and number of jobs created or retained.
5	State Program Name:	National Housing Trust Fund Program
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	HTF funds will be used in tandem with other financing programs to provide necessary financial support to create new, 30-year affordable rental housing for extremely low-income and very low-income households. FHFC will allocate HTF funds through an RFA process directly to eligible recipients.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The criteria listed below have all been deemed of equal relative importance.</p> <ul style="list-style-type: none"> • The development must be permanent rental housing and each NHTF-designated unit may have no more than two bedrooms; • The NHTF-designated units must remain affordable to extremely low-income and very low-income households through a Land Use Restriction Agreement for no less than 30 years, and the development must remain affordable at designated income levels for a minimum of 30 years; • The applicant must certify that it understands that by receiving NHTF funds, it commits to set aside the required number of units in its property for the priority households specified in this plan; • The applicant must show via its developer experience its ability to obligate NHTF funds and undertake eligible activities in a timely manner; • A description of the eligible activities to be conducted with the NHTF funds; • Extent to which the application makes use of non-federal funding sources; • Certification that applicant will comply with the requirements of the NHTF program and that housing units assisted with the NHTF will comply with NHTF requirements; • Be familiar with the requirements of other federal, state or local housing programs that will be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs through demonstrated experience with developing, owning and managing affordable multifamily rental housing developments; • To provide a Tenant Selection Plan during credit underwriting to carry out management practices related to leasing to homeless households or persons with special needs;
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	<ul style="list-style-type: none"> • Participate in the state’s “Link Strategy” which requires applicants awarded financing to work with at least one Special Needs Household Referral Agency working in that county that will refer eligible homeless, at-risk homeless or special needs households for residency in the NHTF-financed units; • Meet specified green building and accessibility standards; • Propose developments in locations that are proximate to public transportation options and amenities such as grocery stores and pharmacies; and • Accept the Tenant Application and Selection Requirements designed to lower barriers to entry for extremely low-income and very low-income households.
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to NHTF.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Not applicable to NHTF.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable to NHTF.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Ninety percent of the NHTF allocation will be used to finance affordable rental units for extremely low-income and very low-income households, and 10 percent of the allocation will be used by FHFC for administrative costs pursuant to § 93.202.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Pursuant to § 91.320(k)(5) and § 93.300(a), funding limits are based on maximum per-unit development subsidy amounts specified by FHFC and the portion of units that will be required to be set aside in a larger property to serve the populations targeted through the NHTF Program. For example, if four units out of 100 total units must be set aside for this purpose, the grant size limit will be based on the per-unit limit multiplied by four. FHFC has specified per-unit limits by unit mix (zero, one and two bedrooms); based on construction type (e.g., garden-style wood, high rise, etc.) and for three geographic cost regions of the state. While a development may have a mix of unit sizes and bedrooms, NHTF units with more than two bedrooms will be prohibited.</p>

What are the outcome measures expected as a result of the method of distribution?	In 2021, it is expected that the NHTF program will assist in financing construction of 125 affordable rental units to serve extremely low-income and very low-income residents.
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Discussion:

In conclusion, the distribution methods in place for each of the five HUD-funded grant programs described above are aligned with the current federal regulations and are standard for each annual allocation cycle. The distribution methods for all administered grant programs in the state are based on several factors, including both geographic and demographic conditions.

- The CDBG program bases allocation distribution methods on the eligible grantees who submit competitive scored applications that are awarded based on score and eligible project readiness.
- The ESG Program determines its allocation methodology using a competitive grant application that is scored based on the CoC's capacity to perform the services and the proposed activities to those who meet the definition of homeless or are at risk of homelessness. The HOME Program bases allocation distribution on awards to high performing CHDOs for the CHDO set-aside and other eligible applicants to receive direct funding from the program to carry out eligible program activities and an application process where award determinations are based on the quality of the application submissions and the amount of the requests from eligible local governments and housing provider organizations.
- The HOPWA Program bases allocation distribution on the amount of funding available and the proportion of persons living with HIV or AIDS within the project sponsor areas.
- The NHTF Program bases allocation methods on a RFA process to ensure that over time, properties assisted with NHTF funds will be geographically dispersed throughout the state, but allocated only to experienced, qualified applicants that meet specific criteria to ensure that a high-quality development is built and then offers opportunities for residency to extremely low-income and very low-income populations that will be served with this funding.

AP-35 Projects – (Optional)

Introduction:

The CDBG, ESG and HOPWA Programs do not provide money to specific projects. Each program allows eligible grantees to select new or continuation projects to apply their awarded funds toward, if the projects meet all grant program eligibility requirements and goals aligned with the Consolidated Plan.

HOME for rental developments are selected through a statewide RFA process. Eligible housing providers (nonprofits, for-profit developers, local governments, public housing authorities and CHDOs) are encouraged to apply for HOME funding. There are three primary criteria applicants must demonstrate: (1) ability to proceed with construction or rehabilitation; (2) experience in developing affordable housing; and (3) ability to leverage HOME funds.

The HOME Rental Program offers funds to eligible housing providers for the acquisition, rehabilitation, new construction, conversion of non-residential units to residential units and reconstruction of multifamily housing. HOME funds may be the primary source of financing or may bridge the gap between the development's primary financing and the total development costs. At least 15 percent of the annual allocation is set-aside for CHDO developments with the remaining funds being allocated to CHDO and other developments depending on the ranking.

HOME funds for homeownership fall under FHFC's Homeownership Pool (HOP) Program, under Rule 67-57, F.A.C., and is designed to be a non-competitive and on-going program with developers reserving funds for eligible homebuyers to provide purchase assistance on a first-come, first-served basis.

The HOP Program is available to nonprofit and for-profit organizations and the United States Department of Agriculture - Rural Development (USDA-RD).

HOME funds are used to provide financial support to families of low- to moderate-incomes with down payment and closing costs assistance up to the amounts stipulated in the HUD regulations. These funds require repayment if the homebuyer ceases to occupy the property as their primary residence during the affordability period, sells or transfer ownership or rents the property. Repayments are re-invested in the HOME program.

Tenant-Based Rental Assistance (TBRA) provides Public Housing Authorities (PHAs) who administer the HUD Section 8 Housing Choice Voucher Program with HOME TBRA funds to assist their local residents as these PHAs have a staggering wait list of potential applicants for housing.

NHTF Program developments will be selected through a statewide RFA process. Eligible applicants (including nonprofit and for-profit developers and public housing authorities) will apply for NHTF funding in tandem with other primary affordable financing, e.g., Low Income Housing Tax Credits. This program will only offer financing for new construction of multifamily rental properties. NHTF funds will

assist in bridging the gap between a development’s primary financing and its total development costs.

For information on CDBG-DR projects and priorities, please see the CDBG-DR Action Plans on the DEO Office of Disaster Recovery website (<https://floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative>).

#	Project Name

Table 9 – Project Information

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

Please see AP-25.

AP-38 Project Summary
Project Summary Information

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

Yes. The state may help local non-entitlement units of local government apply for Section 108 loan funds *if* the local government can demonstrate a feasible and practical use of funds in compliance with program requirements. Note that use of CDBG funds to guarantee a Section 108 loan is not often considered to be practical based on the limited availability of CDBG funds and the significant needs of the many non-entitlement local units of government.

Available Grant Amounts

The maximum amount of an individual loan guarantee commitment that an eligible local government may receive is \$5 million.

Acceptance process of applications

The Section 108 loan guarantee application, review, and approval process is outlined below:

(1) Eligibility.

(a) Municipalities and counties on the U.S. Department of Housing and Urban Development's (HUD) list of non-entitlement local governments in Florida are eligible to apply for Section 108 loans guaranteed by the state of Florida's current and future Small Cities Community Development Block Grant allocations.

(b) Any project proposed for funding through the Small Cities Community Development Block Grant Loan Guarantee Program must be located within the jurisdictional boundaries of the non-entitlement local government that is applying for the loan.

(c) Section 108 loan requests must meet one of the three National Objectives to be eligible for consideration.

(2) Application Process.

(a) Eligible non-entitlement local governments wanting to receive assistance through the Small Cities Community Development Block Grant Loan Guarantee Program may apply at any time during the year. The following application process must be followed:

1. The non-entitlement local government completes the Section 108 Pre-Application Questionnaire, Form SC-58, <http://www.flrules.org/Gateway/reference.asp?No=Ref-05349>; effective date: April 2015, which is hereby adopted and incorporated by reference, and submits it to the Florida Department of Economic Opportunity (DEO) for review.
2. Following DEO's review and acceptance of the local government's responses to the Section 108 Pre-Application Questionnaire [sic], the local government requests a screening meeting with DEO. The meeting is held to determine if the proposed project meets all program requirements.

3. If the department determines that the project is eligible for further consideration, the local government is invited to submit an loan request that contains the information required in [42 USC 5308](#), effective [sic] date: February 3, 2015, which is available at <http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title42-section5308&num=0&edition=prelim>, and which is incorporated herein by reference and [24 CFR part 570](#), subpart M. The local government must provide documentation to the department that it has met the Citizen Participation requirements detailed in paragraph [73C- 23.0041\(1\)](#), F.A.C., with the exception that it only has to provide a project summary and draft budget at the second public hearing.

Please see the Grantee Unique Appendix for the complete response.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No.

State's Process and Criteria for approving local government revitalization strategies

Not applicable.

AP-50 Geographic Distribution – 91.320(f)

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

CDBG: The Florida Small Cities CDBG program does not allocate funding resources geographically. Instead, each year a Notice of Funding Availability is published inviting eligible non-entitlement municipalities and counties to submit an application for funding consideration. There are four program areas: Economic Development, Housing Rehabilitation, Neighborhood Revitalization, and Commercial Revitalization.

Before submitting an application, the local government must conduct a public hearing to receive input on what they consider is the community's highest priority need. Based on this information, the local government selects a project for funding and prepares an application for one of the four program areas. The local government must hold a second public hearing to inform the community of the proposed application and to seek public comment thereon prior to submitting the application to DEO. CDBG staff review the applications received in each program category and rank them from the highest to the lowest score. Funding is awarded from the highest to the lowest ranked application until there are no funds available.

Allowing the local governments to establish their priority need based on the above described process is beneficial to CDBG subgrantees. It allows DEO to be more flexible in funding projects that are responsive to a local community's changing needs rather than require a community to submit a project based on a priority established by the state that may not be a priority need in a local community or may result in a community not submitting an application because the state established priority is not responsive to their local priority need.

ESG. The ESG Program is a formula grant program based upon the demographics of Florida's counties and cities. The state receives the grant funds directly from HUD and subgrants the ESG funds to units of general- purpose local government and/or non-profit organizations. Eligible beneficiaries must meet the applicable definitions in 24 CFR 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR 576.104. Local governments may establish further eligibility criteria for program beneficiaries in accordance with 24 CFR 576.400 (e). All local government and non-profit recipients must consult with the CoCs operating within their jurisdiction before determining how ESG funds are allocated.

Please see the Grantee Unique Appendix for the complete response.

Geographic Distribution

Target Area	Percentage of Funds
STATEWIDE	100

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The programs administered by the DOH, DCF, FHFC and DEO are applied statewide. Rationale for geographic allocation is discussed by program in the previous response.

Discussion

Please see above.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

All five of the federal funded grant programs described in the 2020-2024 Consolidated Plan (CDBG, HOME, ESG, NHTF and HOPWA) have strategies to achieve affordable housing goals each year. The CDBG program supports affordable housing by providing funds for rehabilitation, or demolition and reconstruction, of housing units. The HOME Program addresses affordable housing for low- and very low-income households by providing rehabilitation, reconstruction, new construction and rental assistance activities. The ESG Program supports affordable housing by providing rapid re-housing activities to the homeless segment of the population. The HOPWA Program supports affordable housing by providing housing opportunities to persons with HIV/AIDS. This includes adhering to Fair Market Rents (FMR) and rent reasonableness. The HOME and ESG Programs set affordable housing goals to achieve each federal fiscal year. The CDBG program bases their accomplishments on the number of beneficiaries served with housing rehabilitation funds each application cycle. The NHTF Program will work in tandem with other affordable housing programs to finance new units for extremely low-income and very low-income residents.

One Year Goals for the Number of Households to be Supported	
Homeless	70
Non-Homeless	712
Special-Needs	34
Total	816

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	325
The Production of New Units	240
Rehab of Existing Units	145
Acquisition of Existing Units	0
Total	710

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion:

In conclusion, Affordable Housing continues to be a top priority for HUD-funded grant programs in the state due to the statewide need for all segments of the population. All goals, objectives, and strategies to expand Affordable Housing efforts in each of the five grant programs described throughout this Annual Action Plan align with the 2020-2024 Consolidated Plan and will be implemented in accordance to the allocation distribution methods described in the previous sections of this document.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The CDBG, ESG and HOPWA programs do not allocate direct funding to Public Housing Agencies (PHAs), nor are they eligible to support competitive applications to request funding from any of the programs. FHFC contracts with certain PHAs to administer short-term, tenant-based rental assistance with HOME funds and PHAs may be eligible to apply for rental development funding through a RFA process. There are direct grant funding programs and initiatives available through the U.S. Department of Housing and Urban Development Office of Public and Indian Housing for PHAs who demonstrate good performance standing and are not designated as troubled based on low monitoring and performance scores. PHAs determined to have high performance records are eligible to receive direct funding in order to implement rental assistance and affordable housing programs such as Section 8 project-based rental assistance and voucher programs.

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

- Provide the tools and education necessary for public housing residents to move toward the goal of self-sufficiency.
- Provide job training programs for public residents to maintain full-time employment.
- Provide rent disincentives to encourage public housing residents to budget finances properly.
- Create networking opportunities for public housing residents to work with after they no longer need assistance.

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

- Provide the tools and education necessary for public housing residents to move toward the goal of self-sufficiency.
- Provide job training programs for public residents to maintain full-time employment.
- Provide rent disincentives to encourage public housing residents to budget finances properly.
- Create networking opportunities for public housing residents to work with after they no longer need assistance

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

or other assistance

N/A.

Discussion:

None.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

DCF, through the ESG Program, provides funding for activities such as emergency shelters, street outreach, homeless prevention, and rapid re-housing for homeless persons throughout Florida. Each of the funding categories have eligible activities that can be implemented with ESG funding to achieve annual goals and objectives.

DOH, through the HOPWA Program, provides funding for short-term transitional and short-term and long-term housing activities for persons living with HIV/AIDS.

FHFC, through the NHTF Program, will provide funding for permanent rental housing to serve households that are homeless or at risk of homelessness and/or have special needs, with property managers required to work with approved supportive service providers to seek these tenants.

These three federal funding programs described in the 2020-2025 Consolidated Plan target specific segments of the special needs population in Florida, but the CDBG and HOME Programs do not directly fund special needs populations.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

DCF contracts with the 27 CoC lead agencies throughout Florida to create and implement outreach strategies that are effective in their particular jurisdiction. Case managers assess housing and service needs of this population, and arrange, coordinate, and monitor the delivery of individualized services to meet individual needs. Unsheltered persons are engaged through street outreach for the purpose of providing immediate support, intervention, and connections to programs, social services, and housing. Individuals engaged in street outreach may be provided case management, emergency health services, emergency mental health services, and transportation to emergency shelters or other service facilities.

Additionally, DCF has a vision to move the agency from a crisis agency to a prevention agency by reducing the number of families in crisis. This vision characterizes a shift from a focus on solely processing benefits to providing services that help our customers achieve meaningful employment and economic independence. DCF launched phase one of a program model, referred to as Care Coordination during FFY2020. The care coordination model provides DCF staff who assist SNAP and other recipients with identifying barriers to employment, such as homelessness, substance abuse, childcare or transportation, and referring customers to community resources based on individual needs to help overcome those barriers. The Care Coordination model was piloted in several counties, however DCF expects the model to be statewide by July 2021. **Addressing the emergency shelter and**

transitional housing needs of homeless persons

DCF will allocate up to 60 percent of the annual ESG award to the emergency shelter and street outreach components, a portion of this will fund services, maintenance and operation of emergency shelters.

Other projects addressing the housing needs of people experiencing homelessness will be up for renewal in the CoC Notice of Funding Availability (NOFA) for 2021, though it should be noted that ESG cannot fund transitional housing.

To meet the safe shelter needs for victims of domestic violence, Florida provides more than \$31 million in state and federal grants to support 42 domestic violence centers, providing over 39,000 emergency shelter nights of care. State revenue sources provide more than \$12 million of the funding for these emergency shelters.

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 ESG Program works with the 27 CoCs and their homeless service providers to provide the numbers and reasons for their respective jurisdiction's homeless population in relation to determining needs of homeless persons, including outreach, shelter, prevention services, and housing. ESG priority needs (as noted in Section SP-25) include street outreach, emergency shelter, and homeless services and rapid rehousing. Sixty percent of ESG funds are expected to be used for street outreach and shelter, while 40 percent are expected to be used for permanent housing solutions, including rapid rehousing and homelessness prevention. To address the needs of homeless persons within a jurisdiction, the CoC agencies must provide current and concrete data to ensure that the appropriate amount of funding, depending on funding allocation availability, is distributed properly among the eligible grant categories. The CoC agencies are also responsible for creating strategies and providing services to homeless persons within their jurisdiction that promote self-sufficiency and access to more permanent housing options.

The CoC agencies within Florida implement a variety of programs that provide services to specific segments of the homeless populations including chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The ESG Program provides funds directly to CoC lead agencies for operation and maintenance of emergency shelters, as well as for rapid rehousing. Other programs can include street outreach, job training, housing counseling and other similar programs. Due to a shortage of direct federal program funding, the CoC agencies and their homeless services providers must seek other funding sources available through public- and private-sector resources to implement their strategies to assist in promoting the transition into

permanent housing and avoidance of being homeless once again. Specific strategies to promote self-sufficiency and transition out of homelessness include mental health and housing counseling services, job training, transitional housing with supportive services and permanent housing with temporary supportive services.

Homeless persons will also be assisted with the transition into permanent housing as a result of the creation of extremely affordable units set aside for homeless persons integrated into larger general occupancy through the NHTF Program. Tenants for these units will be referred by providers such as CoC agencies and other providers serving homeless persons.

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

There are a number of private nonprofit housing and supportive housing service providers throughout Florida that specifically assist individuals and families with low- and extremely low-incomes and implement strategies to avoid homelessness. The NHTF Program will provide additional opportunities for these providers to work with NHTF-funded properties to transition persons being discharged from various facilities, programs and institutions to affordable, independent housing integrated into the community and with service supports from the referring supportive services provider and partners.

Many public housing authorities also implement programs and strategies for their clientele to receive the necessary support system to avoid becoming homeless and help them to achieve self-sufficiency. In regard to the state of Florida's efforts to assist in funding strategies and initiatives for this particular segment of the population, FHFC works with public housing authorities and other housing and supportive housing services to identify at-risk individuals or families within the homeless population (extremely low-income or zero-negative income) and monitor their need for public services such as sufficient housing, healthcare, social services, employment, education and youth needs. Additionally, the ESG program offers homelessness prevention services to assist individuals and families from becoming homeless.

Discussion

Please see above.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	1,050
Tenant-based rental assistance	240
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	200
Total	1,490

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

The Shimberg Center for Housing Studies' 2019 Market Study documents substantial increase in Florida's rental stock between 2000 and 2017; however, the study also shows a decline in affordable rental stock—particularly units renting for less than \$1,000 per month. There are both market and policy barriers to affordable housing that contribute to the shortage of affordable housing statewide, including the high cost of new construction, limited funding to subsidize affordable housing development, land use regulations, and neighborhood opposition to affordable development.

As part of the stakeholder survey conducted for the Consolidated Plan, Florida stakeholders were asked to identify barriers to fair housing choice. Top barriers related to affordability that were identified by stakeholders included the following (parenthesis indicate average level of severity reported by stakeholders on a scale from 1 to 10 where 1 is “not a fair housing barrier” and 10 is “a very serious fair housing barrier”):

- Affordable housing is in poor condition (7.6/10)
- Landlords requiring 3x rent in monthly income (7.2/10)
- Excessively high security deposits/first and last month rent requirements (7.1/10)
- Loss of low-cost or market rate affordable housing due to revitalization/redevelopment (6.5/10)
- NIMBYism/community opposition or resistance to development by neighbors (6.3/10)
- Overly restrictive local land use and zoning regulations that limit development of affordable housing (5.9/10)
- Local growth limitations that limit the development of affordable housing (5.6/10)
- Lack of land zoned for affordable modest density development (5.4/10)
- Lack of land zoned for multifamily development (5.2/10)
- State law that limits inclusionary zoning requirements (5.1/10)
- State regulations governing evictions of renters (5.1/10)

These barriers either prohibit or drive the cost of housing development that might otherwise have the potential to provide affordable units to the many who need it. Challenges to addressing the barriers as identified by respondents include lack of funding for subsidies, NIMBYism, enforcement challenges, lack of transition assistance especially for families and limited access to public transportation especially in rural or less urban areas where land prices may be less.

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

Though many of the barriers identified above are outside the purview of the Florida Department of Economic Opportunity, the Florida Department of Health, the Florida Department of Children and Families and FHFC, these agencies will continue to allocate federal and state resources to affordable housing including housing rehabilitation, emergency shelter and transitional housing, permanent housing for people experiencing homelessness, housing services, rental and homeownership activities through CHDOs and the new construction of affordable housing.

Discussion:

Please see above.

AP-85 Other Actions – 91.320(j)

Introduction:

In this section of the Annual Action Plan we will examine the additional actions, if any, that will be developed and implemented by each of the five HUD-funded, state administered grant departments and agencies for the purpose of expanding outreach to areas of Florida that have been identified as underserved or have specific obstacles that must be addressed with program funding.

Actions planned to address obstacles to meeting underserved needs

DEO administers the CDBG program, which serves the needs of its subgrantees through the grants that are awarded. Applications that are submitted by these local governments are based on comments received at local public hearings that allows citizens to identify their priority community needs and submit eligible projects for funding consideration.

The statutorily-created State Council on Homelessness, a statewide workgroup of members that include the coalition board, members of multiple statewide partner coalitions and representatives from various state agencies (including DOH) will continue to convene.

DCF administers the ESG Program, which collaborates directly with Florida's 27 CoC lead agencies to identify areas with high concentrations of underserved homeless populations and use the information collected to update and implement strategies to overcome obstacles identified. The ESG Program provides direct funding to the CoC lead agencies in the categories of emergency shelter, street outreach activities and permanent housing services.

FHFC administers the HOME and NHTF, which also serves on the Council on Homelessness and provides two important ways local governments and emerging nonprofits can learn more about and receive support on, affordable housing development issues. The Catalyst Program provides training and technical assistance on federal and state affordable housing programs, including HOME. FHFC contracts with nonprofit providers for this service. The Predevelopment Loan Program provides revolving loan funds to emerging nonprofits and PHAs interested in housing development and redevelopment. The program provides predevelopment loan funding to get a project started and technical assistance at no cost to the organization.

Actions planned to foster and maintain affordable housing

The CDBG program does not fund affordable housing projects, but does provide grants for housing rehabilitation projects. Funded projects allow homeowners to remain in their homes and maintain the affordability of their homes. This also builds on Florida's strategy to create and maintain affordable options for it's workforce.

The HOME Program provides program funding to produce and rehabilitate housing units for affordable

homeownership and rental housing opportunities for low- and moderate-income working households addressing long-term affordability. Along with the HOME Program, FHFC uses a variety of other resources to provide affordable housing financing.

The goal of the NHTF Program is used in tandem with other affordable financing to add new units to the supply of decent, affordable rental units for ELI and VLI households in Florida.

The goals of the State HOPWA Program are to increase housing stability and improve the quality of life for clients and their families. The State HOPWA Program achieves this goal by setting annual performance outcomes in the form of estimates of beneficiaries served, and housing and supportive services provided.

Actions planned to reduce lead-based paint hazards

Florida recognizes the relationship between health and lead poisoning, especially the risk it poses to children. The Florida Department of Health website provides a list of ways to prevent lead-based paint exposure, they include:

- Determining the construction year of the house or dwelling where a child spends a large amount of time (e.g., grandparents or daycare);
- Considering testing the home for lead-based paint and dust by an Environmental Protection Agency (EPA) certified lead risk assessor or inspector;
- Making sure the child does not have access to chipping, peeling, or chalking paint or chewable surfaces painted with lead-based paint;
- Creating barriers between living/play areas and lead sources;
- Ensuring children and pregnant women should not be present during renovation in housing built before 1978; and
- Considering renovation or repair work on a pre-1978 home, be sure to follow the EPA Lead- Safe Guide to Renovate Right.

The Florida Department of Health encourages the RRP Rule when considering renovations on any pre-1978 home. Also, the mission of Florida's Healthy Homes & Lead Poisoning Prevention Program (FHHLPPP) is to protect the health and cognitive development of all children living in Florida by eliminating childhood exposure to all lead hazards.

The Florida Small Cities CDBG and the HOME programs require all applications for housing rehabilitation projects to determine the age of the house. Any home that was constructed before January 1, 1978, must be tested for lead-based paint and appropriate measures undertaken to safely remove and dispose of the paint in accordance with

HUD requirements.

Actions planned to reduce the number of poverty-level families

The state's approach to poverty reduction is discussed in detail in the 2020-2024 Consolidated Plan Strategic Plan (SP-70). In a holistic sense, the entirety of Florida's Consolidated Plan Strategy and Action Plan is anti-poverty related because a stable living environment is also a service delivery platform. Many of the strategies developed for the five-year Consolidated Plan directly assist individuals who are living in poverty.

Florida's anti-poverty strategies are carried out by programs administered by several state agencies including the Department of Children and Families (DCF) and the Department of Economic Opportunity (DEO). DCF is the state agency responsible for the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance to Needy Families (TANF), the most prominent and recognizable economic supports available. The state provides these services as a temporary means to assist families in need. DEO provides reemployment assistance and job placement services.

DEO provides reemployment assistance, job search and career planning assistance, and other resources to assist businesses and entrepreneurs establish businesses in Florida and create jobs. The Small Cities CDBG program funds economic development projects and requires that 51 percent of the jobs created be made available to low- to moderate-income workers. Job training is also required, at no expense to the employee, if skills above a high school education are required.

Anti-poverty activities fall within several categories including: financial literacy, education and training and safety net programs include:

- Florida Financial Literacy Council programs;
- Florida Prosperity Partnership (FPP) programs;
- Florida Dislocation Workers Reemployment and Emergency Assistance Coordination (REACT);
- Supplemental Nutrition Assistance Program Employment and Training Program (SNAP E&T);
- Job Corps;
- Veteran's Workforce Program;
- Reemployment Assistance; and
- Temporary Assistance to Needy Families (TANF).

In addition, HUD-funded programs discussed in detail in this Action Plan (CDBG, HOME, NHTF, ESG and HOPWA) provide funding for jurisdictions to carry out activities such as housing rehabilitation, affordable housing development and support, emergency shelter assistance and housing opportunities for persons with HIV/AIDS for low- to moderate-income households.

Actions planned to develop institutional structure

Grantor agencies are constantly creating new innovative strategies to address gaps in their delivery systems. Some traditional examples of strategies being used are to leverage funds from other eligible grant programs or initiatives with existing allocations, provide more technical assistance funding to enhance outreach, and create spending caps on specific eligible categories to ensure that the funding dollars are being properly distributed. These traditional strategies are not always effective, but they are the most commonly used because of their practicality. More innovative strategies include using technology, such as social surveys and social media devices, to constantly monitor the changing population in order to adjust their outreach and delivery methods to meet the priority needs of the community.

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

Through the state's existing "Link Strategy," developers receiving finances through a number of FHFC's affordable rental development programs must reserve a small portion of units for tenants referred by an approved supportive services agency working in the community where the property is located. Populations served through this strategy include homeless persons and persons with special needs (including persons with disabilities, survivors of domestic violence and youth aging out of foster care). Properties financed with NHTF Program funding will also be required to implement this approach, with the addition of those at risk of homelessness being able to be served. FHFC is working with other state agencies to implement this strategy.

Discussion:

Please see above.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The CDBG program anticipates receiving \$118,476 in program income this year. The program will not receive any proceeds from Section 108 loan guarantees, and there are no urban renewal settlements, lines of credit, or float-funded activities.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(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	118,476
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	118,476

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	70.05%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

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

FHFC does not use any other forms of investment with HOME Program funds other than those described in 24 CFR § 92.205(b).

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for

homebuyer activities as required in 92.254, is as follows:

Funds that are loaned to an eligible borrower in conjunction with the Homeownership Loan Program competitive cycle and the Homeownership Pool Program will conform to the following guidelines:

- A. At the time of purchase, the initial buyer must satisfy the two following criteria:
 - 1. Must be a low-income family (have an income of 80 percent or less of the median income for the area), and
 - 2. Must occupy the acquired property as the principal residence.

HOME-assisted units shall comply with the purchase price limitation requirements in CFR 24 §

92.254. Eligible homebuyers can receive a zero percent interest rate, deferred payment, subordinate mortgage loan. Repayment of the loan, in accordance with these recapture provisions, is expected if (1) the borrower sells, transfers, or disposes of the assisted unit (either by sale transfer, bankruptcy, foreclosure, or the like), (2) the borrower or a co-borrower dies, and as a result title to the property is transferred to a non-borrower, or (3) the loan matures.

- 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:

FHFC utilizes option (ii) under 24 CFR § 92.254(a)(5)(ii), as its method of recapturing HOME Program funds under any Homebuyer Program the state administers. Resale is not currently utilized. If resale is to be used in the future, the plan will be amended.

A. FHFC will recapture the entire amount of the HOME Investment in the property. If the sale of the unit does not have sufficient proceeds to cover the original HOME investment, the amount recaptured will be the net proceeds (i.e., the sales price minus superior loan repayment, other than HOME funds and closing costs). This method of recapture will be identified in the down payment assistance documents which include a homebuyer agreement with FHFC, promissory note and recorded subordinate mortgage.

Period of Affordability

The recapture provisions are in effect for a period of affordability. This period is based on the amount of direct HOME subsidy to the buyer, as follows:

Amount of HOME funds that were direct subsidy to buyer Period of affordability

Under \$15,000 5 years

\$15,000 to \$40,000 10 years

Over \$40,000 15 years

Principal Residency

The initial buyer must reside in the home as his/her principal residence for the duration of the period of affordability.

Triggering Recapture of HOME funds

If, during the period of affordability, an owner voluntarily or involuntarily transfers his/her property (e.g., through a sale or foreclosure), these recapture provisions go into effect.

The amount subject to recapture is the direct HOME subsidy.

The direct HOME subsidy is the total amount of HOME assistance that enables the buyer to purchase the unit, including a down payment, closing cost assistance and the amount that reduces the purchase price from fair market value to an affordable price.

FHFC can never recapture more than the amount of available net proceeds upon sale. Net proceeds are the sales price of the home minus superior loan repayment (not including HOME loans) and any closing costs.

Noncompliance

During the affordability period, noncompliance occurs when an owner vacates the unit or rents the unit to another household, or sells or transfers the home without FHFC receiving recaptured funds due at time of sale. In the event of noncompliance, the owner is subject to repay any outstanding HOME funds invested in the housing. Repayment is based on the total amount of HOME funds invested, including both development funds and direct subsidy to the buyer minus any principal HOME loan repayments

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:

FHFC has no plans to utilize this financing structure.

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

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

In accordance with the option provided in the federal rule to state recipients, the Department of Children and Families (DCF) shall require the local grantees to establish and implement the written standards required under 24 CFR § 576.400(e)(2). The local grantees shall establish their written standards, and submit them to the DCF for review and approval. The approval by DCF is required prior to the execution of the grant agreement with the local grantee.

DCF's transfer of the responsibility to establish the written standards to the local grantee is consistent with Florida's statutes. In accordance with section 420.624, Florida Statutes, homeless services are intended to be tailored to the unique needs of each community. The homeless planning shall be done at the community level, as is the delivery of services and housing to those in need.

For 2021, the local recipients of the ESG shall develop the following written standards. All such standards shall be consistent with the provisions specified by HUD in the December 5, 2011, Interim Rule.

Required Written Standards

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under the ESG.

Minimum Standards: (1) Consistency with the definition of homeless and at-risk homeless set forth in 24 CFR § 576.2; (2) The record keeping requirements in 24 CFR § 576.500 (b)-(e).

DCF's Limitation: Local recipients shall not use the risk factor for homelessness allowed under 24 CFR § 576.2 related to an individual, who "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness."

Please see the Grantee Unique Appendix for the complete response.

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

The state of Florida does not have a balance of state CoC planning area. Rather, there are 27 local CoC planning areas, covering 64 of Florida's 67 counties each with their own coordinated entry system.

The ESG Program shall require all applicants to submit in their grant proposal, a specific certification that the applying agency is using the CoC's assessment system. Victim service providers may choose not to use the continuum's coordinated assessment system. If so, the victim service provider shall document this decision in writing.

Florida does not have a balance of state CoC plan, and therefore DCF has not established a coordinated assessment system and instead works with local CoC lead agencies to develop this system as required by 24 CFR § 576.400(d).

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).

In 2019, DCF competitively awarded multi-year grants for the ESG program for the following activities:

1. Emergency Shelters;
2. Street outreach;
3. Prevention; and
4. Rapid re-housing.

DCF shall make funds available to local CoC lead agencies in the state, where grant funded activities will be carried out and serve eligible participants.

DCF will detail the grant application requirements in its grant solicitation. Lead agencies may sub-contract to local governments and nonprofit direct service providers to carry-out programs consistent with CoC Plans. The project awards shall make available at least 40 percent of the funding for homeless prevention activities. The lead agencies will determine with the approval of the Office on Homelessness, the funding for proposed direct service providers.

DCF reserves the right to make awards at levels consistent with community needs. Those limits shall cover the base award limit, plus an administrative cost amount of no more than five percent of the grant category award. All applicants shall cover the cost of contributing participant data to the CoC HMIS database, and may cover these eligible costs under the grant category award limit.

DCF may grant awards to entitlement and non-entitlement jurisdictions, while prioritizing its grant awards to applicants that will carry out the grant funded activities in the non-formula cities and counties in the state.

DCF shall publish the notice of grant solicitations using the state of Florida's Vendor Bid System. Such notice shall announce the dates for the submission of grant proposals. The department will provide a completeness review of all applications to identify missing information that is required. Applicants will be provided an opportunity to provide the missing information prior to the evaluation of the application.

Grant awards will be made by DCF based on the determination of which proposals are in the best interest of the state of Florida. Applications will be evaluated according to capacity and performance criteria, which shall serve as a recommendation for consideration to the DCF's Secretary, or designee, in making the grant award decision determined to be in the best interest of the state.

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.

If a sub-recipient of a grant from DCF does not meet the requirements for homeless participation on its policymaking body, and in staffing the activities funded by the grant, then DCF shall require the recipient to develop and implement a plan to comply with the federal requirement. The corrective action plan shall be a condition for receipt of payment under DCF's grant award.

Applicants seeking funding from DCF shall be governed by the requirements in 24 CFR § 576.405 of the HUD Interim Rule.

5. Describe performance standards for evaluating ESG.

Emergency Shelter Performance Goals:

1. Reduction in the unsheltered homeless population of the CoC area.
2. Reduction in the recipients' average length of stay for clients served in the shelter.
3. Percentage increase of persons exiting the shelter who transition to permanent housing.
4. Percentage increase of persons exiting the shelter who leave with employment income.
5. Percentage decrease of persons who exit and return to homelessness within three months.

Street Outreach Performance Goals:

1. Percentage increase of clients assessed who are successfully placed in housing.
2. Reduction in the number of unsheltered homeless persons in the CoC area.
3. Reduction in the average length of time of a person's homeless episode in the CoC area.
4. Percentage increase of clients assisted who were able to receive mainstream benefits, like ACCESS Program benefits.

Prevention and rapid re-housing Performance Goals:

1. Reduction in the number of households with children who are homeless in the CoC area, or reduction in the number of unaccompanied youth in the CoC.
2. Increase in the proportion of the participants served that remained in permanent housing six months following the last assistance provided under the grant.

**Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

All applicants must meet specific mandatory items to be eligible for scoring. Not providing these requirements or providing them incorrectly will cause the application to be ineligible for funding. For RFAs that include NHTF funding, applicants must, in summary, meet the following threshold requirements in addition to the NHTF criteria described:

- submission requirements, such as meeting the application deadline, submitting all required forms and paying the application fee, if there is one;
- completion of all required items in the application and submitting all required forms such as those showing local government signatures on availability of appropriate zoning and infrastructure;
- showing evidence of site control;
- meeting all funding requirements, such as not requesting funding over limits imposed in the RFA;
- submitting financing information, public and private funding commitments and a development cost pro forma and construction/permanent financing analysis;
- not be in financial arrearage in any existing property; meet minimum scores on any scored items in the RFA, if specified (scoring discussed below); and
- a multi-page certification signed by the applicant that includes the certifications described above in addition to others related to meeting the requirements of the RFA.

In partial summary, a certification and/or acknowledgement of the following:

- due dates for items to be submitted in credit underwriting if awarded financing;
- that all building codes, including Fair Housing Act, ADA and other required codes will be met;
- that the applicant’s commitments will be included in a land use restriction agreement and, if applicable, an extended use agreement;
- that all required construction features, including green building requirements as specified in the RFA, will be addressed;
- that resident services programs committed to in credit underwriting will be implemented;
- that a memorandum of understanding with a supportive services referral agency under the state’s “Link Strategy” will be executed and implemented and tenant selection plan will be developed and implemented that includes income and credit strategies recognizing that the extremely low-income households to be served may have credit, income, criminal and rental histories that may be a barrier to tenancy at the property;
- that all financial requirements specified in the RFA will be met;

- that the third party information required for the RFA has been reviewed by the applicant and is accurate; and
- Cooperation with all audits.

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

In addition to applicable rules, statutes and RFA criteria, applications for funding submitted by eligible applicants will be reviewed according to the following NHTF criteria:

- provision of a description of the eligible activities to be conducted with HTF funds;
- the extent to which the application makes use of non-federal funding sources;
- certification that the applicant understands that by receiving HTF funds they commit to set aside the required number of units in its property for the priority households of the HTF program and certify they will comply with the requirements of the HFT program and that the housing units will comply with HTF requirements; and
- demonstrate their ability to obligate HTF funds and their experience and financial capacity to undertake, comply with and conduct eligible HTF activities and undertake HTF activities in a timely manner.

Additionally, with the exception of developments that mainly serve persons with special needs where the provision of supportive services is incorporated into a broader permanent supportive housing strategy, applicants for funding for general occupancy properties that include NHTF units will be eligible for NHTF funding if they commit to participate in the state’s “Link Strategy,” which requires applicants awarded financing to work with at least one Special Needs Household Referral Agency working in that county that will refer eligible homeless, at-risk homeless or special needs households for residency in the NHTF-financed units.

Also, in order to be eligible for NHTF funding, applicants also must commit to develop tenant selection plans that include strategies that demonstrate specific tenant selection and application strategies to address barriers to tenancy that the extremely low-income households to be served may have with credit, income, criminal and rental histories.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Only applications that meet mandatory threshold items will be eligible for funding. The FHFC director appoints staff to a review committee. Each committee member independently evaluates and scores their assigned portions of the submitted applications, consulting with non-committee program staff and legal staff if necessary and appropriate. At the review committee meeting, members read their scores or findings of threshold eligibility into the record. Once the committee knows which applications meet eligibility requirements, funding selection begins with that group of applications. First, eligible applications are ranked from highest to lowest scoring application, with any tied scores separated by tie-breakers. Depending on the funding being offered (programs may have different associated statutory criteria), tiebreakers can include: leveraging of program funds (required in particular for the State Apartment Incentive Loan [SAIL] program); eligibility for the Florida Job Creation Funding Preference (required by state law); and lottery number.

The applications are then selected to meet any goals specified in the RFA. To meet the goals, the committee reviews the list of ranked applications, choosing the highest ranked application that can meet the goals. In RFAs that include NHTF, goals will include requirements to select applications for new construction (since NHTF will not be used for rehabilitation, as discussed below). In addition, a “county award tally,” described above, is employed to disperse awards across counties as much as possible.

Once funding is exhausted, the review committee finalizes its recommendations to present to the FHFC board.

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As part of the RFA Process, the applicant must demonstrate their ability to obligate NHTF funds, their experience and their financial capacity to undertake, comply with and conduct NHTF eligible activities. In addition, show familiarity with the requirements of other federal, state or local housing programs that will be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs through demonstrated experience with developing, owning, and managing affordable multifamily rental housing developments. This will be done through showing prior developer experience by requiring applicants to list development information for a minimum specified number (depends on the combination of program funding in the RFA) of prior developments financed and built through affordable housing programs. In addition, for developments that will primarily serve special needs tenants, applicants are evaluated on a development experience narrative they submit to explain their experience serving the subpopulation(s) targeted; showing prior operating/management experience by requiring applicants to list general management company information for a minimum specified number (depends on the combination of program funding in the RFA) of prior affordable rental developments. For developments that will primarily serve special needs tenants, applicants are evaluated on an operating/managing experience narrative they submit to explain their experience serving the subpopulation(s) targeted; showing active developments affiliated with applicants that financed through any FHFC programs are in compliance; showing that applicants have no financial arrearages in any FHFC programs the applicants are currently funded through.

The applicant must show ability to undertake eligible activities in a timely manner; that is, there must be a reasonable expectation that the development will be placed in service within 24 months, which is typically outlined in closing agreements. The most critical way this is measured is the experience threshold described above.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Florida will prioritize applications for funding which are able to maintain units affordable to extremely low-income households for at least 30 years without project based rental assistance. Florida's experience indicates that combining capital subsidies for extremely low-income units with project based rental assistance is wasteful and limits the total number of units available to extremely low-income households. Maximizing the number of units affordable to extremely low-income households was a goal of Florida Housing long before Congress created the NHTF. For many years, Florida Housing worked to finance as many new extremely low-income rental units as possible, because the need for these units is high. The rental programs administered by FHFC are competitive; consequently, the state is able to encourage the inclusion of project based rental assistance in developments without the addition of NHTF.

Rather than using both types of funding to finance new extremely low-income units, the state's objective is to create additional units for extremely low-income and very low-income households with NHTF. Thus, Florida will not prioritize applications which utilize project based rental assistance. FHFC established the maximum per-unit NHTF subsidy limits in this plan at a level that ensures that properties funded with NHTF will require less debt financing. With less hard-pay debt service, NHTF funded properties will have sufficient cash flow to support the units for 30 years. Where this cross-subsidization is insufficient, FHFC expects applicants to establish an operating deficit reserve to offset projected operating losses from extremely low-income and very low-income units identified during underwriting. Operating deficit reserves may be funded with NHTF and/or from other sources. No more than one-third of the state's NHTF award will be used to fund operating deficit reserves.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

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h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

RFAs also include scored items. RFAs providing financing for general occupancy properties that include a few NHTF units will include the following scoring opportunities based on information submitted by applicants: a score for a minimum local government financial contribution, as specified in the RFA, based on the size of the local government (higher contributions are required from bigger local governments that have access to more local housing dollars); a transit score, measuring the proposed development's proximity to public bus stops, bus rapid transit stops, or rail stops – the closer the proposed development is to transit, the more points received and the more intense the transit (rail or bus rapid transit compared to a regular bus stop), the higher the score; and a proximity score, measuring the proposed development's nearness to such resources as grocery stores, medical facilities, pharmacies and public schools, with a higher score for proposed developments that are closer to these resources.

RFAs offering financing for homeless or special needs populations provide opportunities for applicants to provide narrative sections to be scored as well. In the past FHFC has included narrative sections for applicants to describe: the population(s) to be served; the applicant's experience in developing and managing properties for these populations; access to public or other transit; proximity to shopping, employment, education and recreation; access to community based supportive services; and tenant selection policies and approach. Additional narrative criteria may be added to or replace existing narrative criteria by FHFC.

Because of FHFC's exacting RFA requirements, applications which meet all threshold mandatory criteria and any

additional scoring criteria will be eligible for selection according to the scoring criteria in the RFA. Any of these eligible applications will be deemed to meet the state's priority housing needs, particularly those relating to serving extremely low-income persons with special needs.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In the RFA, applicants will be reviewed in accordance with the specific RFA criteria which will include the extent to which the application makes use of non-federal funding sources as compared to total units in the proposed development (leveraging factor). This may be measured by different methods, depending on the other funding being blended with NHTF. For example, FHFC can calculate the leveraging factor using any of these types of subsidies: The amount of any financial contribution from the local government to the development; the amount of SAIL or other state funding in the development; and/or the amount of other non-governmental sources of funding in the development, such as private or nonprofit loans or grants.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes.

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

These limits are based on compilation of data about non-luxury developments and reasonable land costs around the state through years of administering Multifamily Mortgage Revenue Bonds, state gap funding, Low Income Housing Tax Credits and other program funding, combined with information about the current cost environments in these areas. The limits specify different amounts based on three geographic cost regions of the state, as well as five development types, ranging from garden-style wood apartments to high rise concrete buildings. FHFC updates its cost limitations regularly based on current actual contracts that deliver affordable housing units, inclusive of any required green features; industry review; construction trends; and stakeholder feedback.

The limits developed by FHFC are based on historic information and analysis of two components in considering an appropriate maximum: the cost to acquire land and develop a property and the level and cost of the debt associated with the property, which differs by program.

The typical sources of financing in an affordable rental development in Florida include bonds, state gap financing, housing credit equity, a traditional first mortgage, local government resources and a deferred developer fee. The housing credit equity does not have any repayment requirements and the local government resources are typically cash flow dependent. The objective of providing NHTF funding is to lower any loan or other debt on a property to ensure that the development is financially feasible.

All developments receiving NHTF awards will be subject to credit underwriting and undergo a subsidy layering review to ensure that financing awarded is no greater than what is needed to make the development financially feasible. FHFC may specify lower NHTF maximum limits in specific RFAs.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

FHFC will only use HTF funds on the development of new construction rental units.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The state of Florida will give a preference to the following segments of the extremely low-income population, which will also be integrated into the written agreements with the recipients of NHTF: persons and households with incomes at or below 22 percent of area median income in order to serve those at or near the Supplemental Security Income (also known as SSI) level and that are persons with special needs, defined in Florida Statute at 420.0004(13); and/or homeless households as defined by FHFC including persons and families at risk of homelessness.

These households have limited access to high quality, affordable housing and few new units of housing or rental assistance affordable to these residents are being made available. Households that receive SSI as their only income are at median income levels of approximately 22 percent. As discussed in the Needs Assessment section of the 2020-2024 Consolidated Plan, there are about 415,000 cost burdened renter households (i.e., those paying more than 30 percent of one's income for rent and utilities) with incomes up to 30 percent of area median income in Florida. In an earlier evaluation of resident incomes served throughout FHFC's rental portfolio, out of 154,000 units reporting, less than 100 were targeted to renters with incomes this low, because current programs are not financially structured in such a way to allow rents to be low enough to serve this income group. Targeting

households at this level would allow Florida to add a new lower income level to the Florida extremely low-income units already being financed through state housing programs.

Florida will prioritize use of NHTF funds for developments that commit to integrate a small number of NHTF-funded units serving the populations described above into various types of properties, including general occupancy affordable housing properties serving family and elderly households with a range of incomes up to 60 percent of area median income in most cases, properties that serve a range of demographic populations and properties that are targeted to persons with special needs or who are homeless. NHTF-financed units will comprise only a small portion of total units in any property, but may be in addition to other Florida extremely low-income and/or very low-income units provided at the property. NHTF funding will be blended with other program financing, such as Multifamily Mortgage Revenue Bonds and State Apartment Incentive Loan (SAIL) gap funds, to finance general occupancy properties that include these units. Any development that has more than five NHTF-assisted units will be required to submit an Affirmative Marketing procedure in accordance with the requirements at § 93.350, together with the signed written agreement.

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A

Discussion:

Please see the Grantee Unique Appendix for the complete response.

Florida 2021

Annual Action Plan Grantee Unique Appendix

CDBG, HOPWA, ESG, HOME, NHTF

AP-40 Grantee Unique Appendix

The Section 108 loan guarantee application, review, and approval process is outlined below:

(1) Eligibility.

(a) Municipalities and counties on the U.S. Department of Housing and Urban Development's (HUD) list of non-entitlement local governments in Florida are eligible to apply for Section 108 loans guaranteed by the state of Florida's current and future Small Cities Community Development Block Grant allocations.

(b) Any project proposed for funding through the Small Cities Community Development Block Grant Loan Guarantee Program must be located within the jurisdictional boundaries of the non-entitlement local government that is applying for the loan.

(c) Section 108 loan requests must meet one of the three National Objectives to be eligible for consideration.

(2) Application Process.

(a) Eligible non-entitlement local governments wanting to receive assistance through the Small Cities Community Development Block Grant Loan Guarantee Program may apply at any time during the year. The following application process must be followed:

1. The non-entitlement local government completes the Section 108 Pre-Application Questionnaire, Form SC-58, <http://www.flrules.org/Gateway/reference.asp?No=Ref-05349>; effective date: April 2015, which is hereby adopted and incorporated by reference, and submits it to the Florida Department of Economic Opportunity (DEO) for review.
2. Following DEO's review and acceptance of the local government's responses to the Section 108 Pre-Application Questionnaire [sic], the local government requests a screening meeting with DEO. The meeting is held to determine if the proposed project meets all program requirements.
3. If the department determines that the project is eligible for further consideration, the local government is invited to submit an loan request that contains the information required in [42 USC 5308](#), effective [sic] date: February 3, 2015, which is available at <http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title42-section5308&num=0&edition=prelim>, and which is incorporated herein by reference and [24 CFR part 570](#), subpart M. The local government must provide documentation to the Department that it has met the Citizen Participation requirements detailed in paragraph [73C- 23.0041\(1\)](#), F.A.C., with the exception that it only has to provide a project summary and draft budget at the second public hearing.
4. The local government then prepares its Section 108 loan application and submits it to the department for review. The application narrative must describe how the proposed project will meet a national objective and the public benefit standards, and it must document that the proposed activities are eligible for funding. The narrative shall also include a detailed budget showing all sources and uses of funds, a repayment (amortization) schedule, required local government certifications, proof of proper citizen's participation and site control (if applicable), background information on project partners, maps and other supporting documentation to illustrate the specifics of the proposed project. Projects which propose a loan(s) to a third party(ies) shall include letters of commitment from all funding sources evidencing sufficient non-loan funds are

available to complete the project. For economic development projects, these commitments shall include those stated in Part 5 of the Economic Development section of the Florida Small Cities Community Development Block Grant Application for Funding, Form SC-60, as incorporated in subsection 73C-23.0030(2)(b), F.A.C., under the “Initial Participating Party Commitments” section.

5. Upon receipt of the application, the department conducts a “due diligence and compliance” review of the application. The department determines whether the application is eligible for funding and financially feasible, ineligible for funding or financially infeasible.

6. The local government shall have a third party complete a detailed underwriting analysis of the proposed project in accordance with 24 CFR 570.482(e)(2) and Appendix A of 24 CFR Part 570, as incorporated in Rule 73C-23.00310, F.A.C.

a. The department shall retain the right to approve the third party underwriter and the method of analysis and to enforce adherence to the guidelines in 24 CFR 570.482(e)(2) and Appendix A, as incorporated in Rule 73C-23.00310, F.A.C. The department shall require additional underwriting standards, criteria or review when it appears that the proposed project is not economically feasible.

b. The client for the underwriter is the department; however, the cost for the underwriting analysis is the responsibility of the applying local government or its partner(s).

c. The department shall be provided the underwriting analysis prior to the final application package being sent to HUD Office in Jacksonville. The department reserves the right to require additional information from the local government, the underwriter and/or the third party to whom a loan is proposed, when it appears that the proposed project is not economically feasible. Once a financial underwriting analysis and other required documentation has been provided by the local government, any material change, including changes in corporate or ownership structure, which affects the underlying assumptions upon which the local government relied, will require that the underwriting analysis be re-evaluated by the local government and the underwriter and any assistance requested for the Participating Party must be adjusted if a material change that affects the conclusions of the underwriter has occurred.

d. Should the project be approved and funded, the cost for underwriting analysis may be reimbursed from loan proceeds to the entity incurring the cost. This reimbursement requires an up-front letter of request to incur pre-agreement costs from the applying local government, delivered to the department prior to incurring the costs.

(3) Site Visit and Contracting Period.

(a) The department will conduct a site visit following review and acceptance of the final application package. For projects which propose loans to a third party(ies), a representative(s) of the third party(ies) shall attend the site visit or shall meet with department staff within 30 days of the site visit at the CDBG Office in Tallahassee.

(b) The local government shall submit a fully executed Participating Party Agreement(s) that meet(s) the requirements set out in Part 5 of the Florida Small Cities Community Development Block Grant Application for Funding, Form SC-60, as incorporated in Rule 73C-23.00310,F.A.C.

(c) The local government and the department shall execute an agreement that outlines the state's requirements for administering the Section 108 loan and includes a Program Budget and an Activity Work Plan.

(d) The department, HUD and the local government sign the HUD Section 108 Loan Guarantee Agreement.

(4) Administration and Reporting.

(a) The local government shall copy the department on all written correspondence with HUD, the underwriter, the Participating Party and all other involved parties.

(b) The local government shall provide the department with quarterly progress reports until the project is administratively closed. This report shall include documentation in a form acceptable to the department of the project's draws and repayments, accomplishments to date, and updates on previous areas of concern as determined by the department.

(c) The local government shall provide documentation and reporting of Minority and Women Business Enterprise participation and Section 3 compliance until the project is administratively closed.

(d) The local government shall meet the requirements of 2 CFR 200.501.

(e) The department shall monitor the local government and project partners to ensure compliance with a National Objective and the public benefit standards, as well as all applicable federal and state regulations.

(f) The local government shall provide the department with documentation of each loan payment made to HUD throughout the life of the Section 108 loan.

AP-50 Grantee Unique Appendix

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

HOME and NHTF: The geographic allocation of HOME funds is dependent on the particular strategy. An ongoing priority is to allocate financing for small rental properties in rural areas, which may also include rural parts of larger counties. Funds for homeownership are at least split between Participating Jurisdictions and Non-Participating Jurisdictions and may include funding for other priorities including self-help developers or providing funding for areas impacted by disasters. In some cases when a particular need is identified, such as a need for homeless housing even in a more urban area, HOME funds may be used to provide gap financing for

such a project. Because FHFC typically has additional state funding that can be used to finance rental housing, HOME funds may be able to be used for other purposes depending on the need. FHFC distributes HOME funds either through a RFA process or a reservation system.

HTF funds will be used in tandem with other financing programs to provide necessary financial support to create new, 30-year affordable rental housing for extremely low-income and very low-income households. FHFC's Board of Directors annually adopts a comprehensive funding plan which distributes financing across geographic areas of the state based on the need for rental housing or specific type of rental housing in each area. HTF funding will be made available across large counties (825,000+ population), medium counties (<100,000 and <825,000 population) and small counties (up to 100,000 population) to ensure geographic distribution and to respond to rental needs studies carried out by and for FHFC. FHFC will allocate HTF funds through an RFA process directly to eligible recipients.

Regardless of the type of RFA issued, HOME or HTF, FHFC regularly uses a "county award tally" to ensure that funding in each RFA is further distributed across as many counties as possible. For example, the tally might specify that once a development is awarded funding in a particular county, that county will not receive another development award unless eligible applications in all other counties have first been awarded.

HOPWA: DOH contracts with project sponsors to administer the State HOPWA Program in designated geographic areas, the majority of which are rural. Six areas not included below are EMSAs that receive funding directly from HUD. The state program provides funds for HOPWA services in 52 of Florida's 67 counties, which includes the re-designated EMSAs administered by the state.

The project sponsors for HOPWA funds and the counties that are served are listed below:

- AIDS Healthcare Foundation, Inc. (Escambia, Okaloosa, Santa Rosa, and Walton Counties)
- BASIC NWFL, Inc. (Bay, Calhoun, Gulf, Holmes, Jackson, and Washington Counties)
- Big Bend Cares, Inc. (Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, and Wakulla Counties)
- WellFlorida Council, Inc. (Alachua, Bradford, Citrus, Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Lake, Levy, Marion, Putnam, Sumter, Suwannee, and Union Counties)
- United Way of Brevard County, Inc. (Brevard County)
- Florida Department of Health-Monroe (Monroe County)
- Health Planning Council of Southwest Florida, Inc. (Charlotte, Collier, DeSoto, Glades, Hendry, Lee, Manatee, and Sarasota Counties)
- Florida Department of Health-Volusia (Flagler and Volusia Counties)
- A.H. of Monroe County, Inc. (Highlands, Hardee, and Polk Counties) Florida Department of Health-St. Lucie (Indian River, Martin, Okeechobee, and St. Lucie Counties)

AP-90 Grantee Unique Appendix

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

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

In accordance with the option provided in the federal rule to state recipients, the Department of Children and Families (DCF) shall require the local grantees to establish and implement the written standards required under 24 CFR § 576.400(e)(2). The local grantees shall establish their written standards, and submit them to the DCF for review and approval. The approval by DCF is required prior to the execution of the grant agreement with the local grantee.

DCF's transfer of the responsibility to establish the written standards to the local grantee is consistent with Florida's statutes. In accordance with section 420.624, Florida Statutes, homeless services are intended to be tailored to the unique needs of each community. The homeless planning shall be done at the community level, as is the delivery of services and housing to those in need.

For 2020, the local recipients of the ESG shall develop the following written standards. All such standards shall be consistent with the provisions specified by HUD in the December 5, 2011, Interim Rule.

Required Written Standards

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under the ESG.

Minimum Standards: (1) Consistency with the definition of homeless and at-risk homeless set forth in 24 CFR § 576.2; (2) The record keeping requirements in 24 CFR § 576.500 (b)-(e).

DCF's Limitation: Local recipients shall not use the risk factor for homelessness allowed under 24 CFR § 576.2 related to an individual, who "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness."

- b. Standards for targeting and providing essential services related to street outreach activities.
- c. Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG. This must include standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, such

as victims of domestic violence. Such standards shall also address the individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

- d. Policies and procedures for assessing, prioritizing and reassessing individuals' and families' needs for essential services related to emergency shelter.
- e. Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers.
- f. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
- g. Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.
- h. 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.
- i. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, 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 months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.
- j. Policies and procedures for coordination among homeless service providers, as well as mainstream service and housing providers.

DCF's Priority: Families with children, as well as youth exiting from state care, shall be given preference under the DCF's awards for both prevention and rapid re-housing, to the maximum extent possible.

Discussion:

Maximum Per-Unit Development Subsidy Amount - § 91.320(k)(5) and § 93.300(a)

The maximum per-unit NHTF subsidy limit is provided in the table below for zero, one and two bedrooms, based on three geographic locations as specified. Units with more bedrooms will not be financed with NHTF funds.

NHTF Maximum Per-Unit Development Subsidy Amounts

Development Location	NC Garden Non-ESSC	NC Garden ESSC	NC MR Non- ESSC	NC MR ESSC	NC HR
Not located in Broward, Miami-Dade, Palm Beach or Monroe	\$260,000	\$275,000	\$275,000	\$290,000	\$335,000
Located in Broward, Miami-Dade, Palm Beach	N/A	\$295,000	N/A	\$315,000	\$370,000
Located in Monroe	N/A	\$405,000	N/A	\$440,000	N/A

N/A means the Construction Type is not allowed or is inappropriate for the location.

The table above presents maximum per unit subsidy for extremely low-income and very low-income households as defined in 24 CRF 92.

These limits are based on compilation of data about non-luxury developments and reasonable land costs around the state through years of administering Multifamily Mortgage Revenue Bonds, state gap funding, Low Income Housing Tax Credits and other program funding, combined with information about the current cost environments in these areas. The limits specify different amounts based on three geographic cost regions of the state, as well as five development types, ranging from garden-style wood apartments to high rise concrete buildings. FHFC updates its cost limitations regularly based on current actual contracts that deliver affordable housing units, inclusive of any required green features; industry review; construction trends; and stakeholder feedback.

The limits developed by FHFC are based on historic information and analysis of two components in considering an appropriate maximum: the cost to acquire land and develop a property and the level and cost of the debt associated with the property, which differs by program. The typical sources of financing in an affordable rental development in Florida include bonds, state gap financing, housing credit equity, a traditional first mortgage, local government resources and a deferred developer fee. The housing credit equity does not have any repayment requirements and the local government resources are typically cash flow dependent. The objective of providing NHTF funding is to lower any loan or other debt on a property to ensure that the development is financially feasible.

All developments receiving NHTF awards will be subject to credit underwriting and undergo a subsidy layering review to ensure that financing awarded is no greater than what is needed to make the development financially feasible. FHFC may specify lower NHTF maximum limits in specific RFAs.