



# State of Florida 2020-2024 Consolidated Plan and 2020 Annual Action Plan

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**Florida Department of Economic Opportunity**  
Small Cities Community Development Block Grant Program  
Community Development Block Grant – Disaster Recovery 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

# Executive Summary

## ES-05 Executive Summary - 91.300(c), 91.320(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 dollars 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 receives 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).

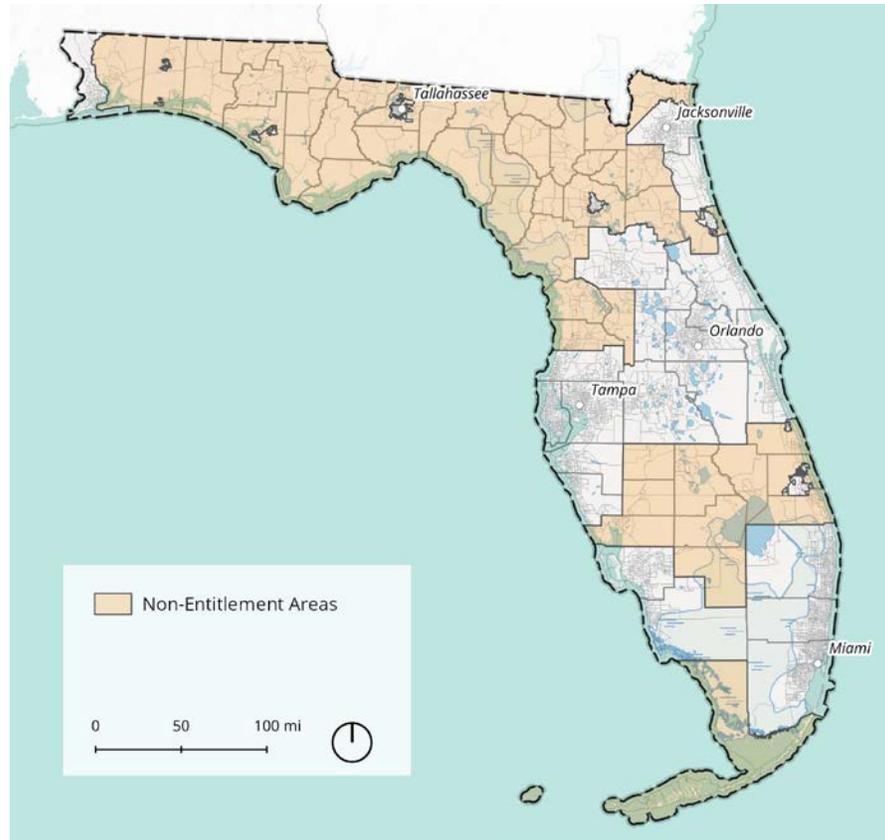
The State of Florida 2020-2024 Consolidated Plan is organized around the following sections:

- Needs Assessment (NA)
- Market Analysis (MA)
- Strategic Plan (SP)
- 2020 Annual Action Plan (AP)

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, community and economic development projects that are eligible for funds through the programs administered by the HUD-funded agencies. The Consolidated Plan also includes a First-Year Action Plan. The First-Year Action Plan describes the activities that will be undertaken in the first year (2020) to address the priority needs and make progress toward meeting the Strategic Plan goals.

The Small Cities CDBG program applies to the following non-entitlement areas (areas that do not receive CDBG funds directly from HUD). Throughout this report, data are provided for the state overall. Where possible, data for non-entitlement areas are also discussed.

**Florida CDBG Non-Entitlement Areas**



The Florida Department of Economic Opportunity (DEO) is the lead agency responsible for overseeing the development of the plan. This document was developed and prepared through the cooperative efforts of the Florida Department of Children and Families, Florida Department of Health, Florida Housing Finance Corporation, and the Florida Department of Economic Opportunity. Community members and stakeholders also participated in the process. Data and information came primarily from the U.S. Census Bureau, the American Community Survey, the Longitudinal Employer-Household Dynamics, HUD datasets, and the Shimberg Center for Affordable Housing Studies at the University of Florida in Gainesville.

**2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

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 other financial resources are not available to meet such needs.

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

- Economic Development;
- Commercial Revitalization;
- Housing Rehabilitation;
- 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 designated specifically to extremely low-income households); and
- Affordable Homeownership Housing.

The goals matrix in SP-45 also accounts for goals that may arise directly related to disaster recovery (CDBG-DR funding) and coronavirus response and recovery (CARES Act funding).

### **3. Evaluation of past performance**

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 (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 2018 Action Plan expenditures served 45,542 residents, 403 households, created 162 jobs, and generated 1,663 housing units, which exceeded nearly every annual target for CDBG, HOME, ESG and HOPWA funding for the program year.

#### **4. Summary of citizen participation process and consultation process**

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. [TO BE UPDATED AFTER PUBLIC COMMENT PERIOD].

#### **5. Summary of public comments**

The public comment period on the Draft State of Florida 2020-2024 Consolidated Plan and 2020 Action Plan ran from October 14 through November 13, 2020. [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**

There continues to be a need for:

- Community and economic development projects in the communities that receive funding through the CDBG Program;
- Financial and supportive assistance to persons with 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 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, as well as 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 Disaster Recovery website: <https://floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative>.

# The Process

## PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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

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

Table 1 – Responsible Agencies

### Narrative

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

### Consolidated Plan Public Contact Information

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Tera Bivens, DCF, ESG, [tera.bivens@myflfamilies.com](mailto:tera.bivens@myflfamilies.com)

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)**

### **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 (91.215(I))**

As part of the Consolidated Planning process, the state reached out to thousands of stakeholders statewide to communicate about the Plan, the process and opportunities for participation. Over 200 stakeholders participated in a survey for the Consolidated Plan including a variety of housing providers, health, mental health and service agencies. The figure on the following page shows the types of agencies that were represented; 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.

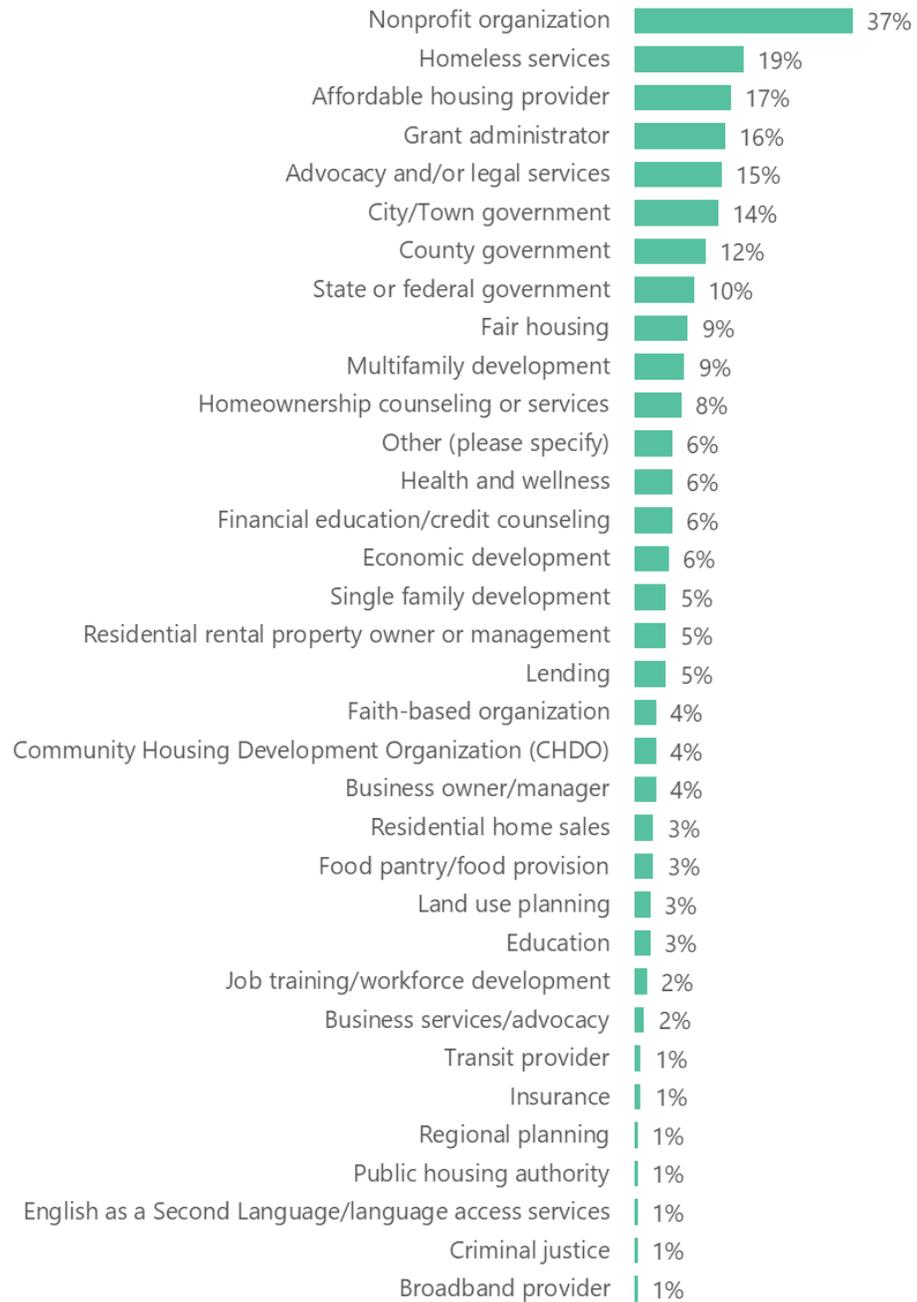
**Type of Industry/  
Organization  
Represented by  
Stakeholder  
Survey  
Respondents**

Note:

Numbers add to greater than 100 percent due to multiple responses.

Source:

2020 Florida Housing and Community Development Stakeholder Survey



**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 the Florida Coalition for the Homeless (who represents the 27 Continuums of Care [CoCs]) to address the needs of different homeless populations throughout the state. State funding may 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.

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 and evaluate outcomes, and develop funding, policies, and procedures for the administration of HMIS**

The DCF Office on Homelessness gathers input from CoCs 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 that fall within the federal regulations.

**2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

See Citizen Participation Appendix for full list of participants.

**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.

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))**

Units of local government were invited to participate in all engagement opportunities throughout the Consolidated Plan development (virtual engagement site, public hearings and stakeholder survey). In addition, cooperation and coordination efforts are ongoing throughout the program year. DEO

consistently offers technical assistance and training opportunities for participants in the CDBG Small Cities Program.

**Narrative (optional):**

Please see above.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 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. [TO BE UPDATED AFTER PUBLIC COMMENT PERIOD].

**Citizen Participation Outreach**

<b>Sort Order</b>	<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/attendance</b>	<b>Summary of comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL (if applicable)</b>
1	Online Survey	Housing and community development professionals representing non-entitlement areas	Nonprofit organizations, Homeless services providers, Affordable housing provider, Grant administrator, Advocacy and/or legal services provider, City/Town government representatives, County government representatives, State or federal government representatives, Fair housing service provider, Multifamily developers, Homeownership counseling or services	See Citizen Participation Appendix.	N/A; all comments are accepted.	URL no longer available.
2	Needs Assessment Forums	Stakeholders and residents living in non-entitlement communities throughout the state.	27 residents/stakeholders participated in the engagement activities on the site	See Citizen Participation Appendix.	N/A; all comments are accepted.	<a href="http://florida.housingimpactlab.com">http://florida.housingimpactlab.com</a>
3	5 Public Hearings	Stakeholders and residents living in non-entitlement communities throughout the state.	To be completed after public comment period when all hearings have been conducted.	To be completed after public comment period when all hearings have been conducted.	To be completed after public comment period when all hearings have been conducted.	N/A

**Table 2 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment describes the housing needs of Florida residents with a focus on the needs of low-income households, special needs populations and people experiencing homelessness. This section also describes non-housing related community development needs. This section relies primarily on data provided by HUD via the Comprehensive Housing Affordability Strategy (CHAS) dataset, Census data from both Decennial enumerations and American Community Survey estimates, the 2019 Point-In-Time count from all Continuums of Care in Florida, as well as contributions from stakeholder consultation.

- **Demographic trends.** Florida is currently home to 21,299,325 residents, and is expected to grow to over 27 million residents by 2045, an overall increase of over 30 percent from 2018. During this time, Florida is anticipated to continue to grow more racially and ethnically diverse with the proportion of racial/ethnic minority residents increasing from 45 to 54 percent. Trends also project significant growth in Florida’s older adult population.
- **Housing needs.** The housing needs data provided by HUD revealed that housing cost burden (spending 30% of gross income on housing) and severe housing cost burden (spending 50% of gross income on housing) were the most prevalent housing problems experienced by Florida residents. Nearly two thirds (64%) of all low to moderate income renters experience cost burden or severe cost burden. The proportion of low to moderate income home owners with cost burden or severe cost burden was also high—50 percent. Overcrowding, although less common, was also a problem that affected Florida residents. Cost burden and severe cost burden were disproportionately experienced by renters and owners in extremely low- and low-income groups (those earning less than 50% of Area Median Income, or AMI).

Stakeholders were asked their opinions about top housing and community development needs in Florida via an online survey titled the “2020 Florida Housing and Community Development Stakeholder Survey”. The most urgent housing needs identified by stakeholders were geared toward specific price-points that are not provided by the private market: rental units affordable at 30% Area Median Income (AMI), 60% AMI, and 80% AMI; long-term tenant based rental assistance; and homes for low- to moderate-income households to buy (60%-120% AMI). The next tier of urgent housing needs included transitional housing, short-term rental assistance, and supportive services.

- **Homelessness.** The 2019 Point in Time count (PIT) identified over 28,000 people experiencing homelessness in Florida. Just over half (56%, 15,852 people) were sheltered while the remaining 12,476 were unsheltered (44%). Total homeless persons identified in the PIT has been declining in recent years (from 35,900 in 2015). However, some estimates indicate a rise in the number of

families with children experiencing homelessness, when including both PIT data and estimates from Florida Department of Education's homeless student count which includes families doubled up with others in hotels and motels. Much of this increase is driven by families displaced by hurricanes since 2016.

- **Non-housing community development.** Stakeholders also responded to questions related to non-housing community development needs across the state. The top five “greatest unmet community development needs” were: increased capacity of nonprofits to provide public/supportive services, job opportunities for un- and under-employed residents; job training/skill development; public transit; and affordable childcare or early learning centers. Infrastructure (for streets/roads, water/sewer, and flood drainage), internet access, and sidewalk improvements were also identified as high priority needs.

## **NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)**

Overall, this section aims to present a clear picture of the housing needs across Florida. This requires an examination of the housing problems most often experienced by households of different income levels and with different needs. HUD's CHAS data provide estimates on the number of households with four specific housing problems:

- Lack of complete plumbing facilities;
- Lack of complete kitchen facilities;
- Overcrowded units (more than one person per room); and
- Housing cost burden (spending more than 30 percent of household income on housing costs).

Among these housing problems, housing cost burden is the most common among Florida residents. HUD's CHAS data also provide estimates regarding households who experience severe housing problems—the most common of which is severe cost burden (spending 50% or more of gross income on housing).

### **Summary of Housing Needs**

The figure below shows current and forecasted housing needs in Florida across incomes, household types and characteristics. Housing need is greatest among extremely low income families (those with incomes below 30% AMI). In this income category, 89 percent of households experience housing problems. The rate of need decreases as income increases with very-low income, low-income and moderate-income households experiencing need at 76 percent, 57 percent and 36 percent respectively. Total need among households with low to moderate incomes is expected to grow to nearly 2.8 million households by 2025 based on annualized population growth rates.

Across the state, 55 percent of renters and 24 percent of owners experience at least one of the four HUD-defined housing problems. The total number of renters experiencing housing needs is expected to increase to roughly 1.5 million by 2025 with the total number of owner households growing to over 1.3 million households.

Nearly one in four (23%) elderly households (those containing a least one person 62 years of age or older) is cost burdened in Florida. The number of total elderly households experiencing cost burden is expected to increase to roughly 738,000 households by 2025.

Single family households are among the household types with the lowest rate of need based on rates of poverty. Roughly 286,000 single person households live in poverty (13 percent of the over 2.2 million single person households).

Finally, housing needs are high (43%) among households with members experiencing at least one disability. This represents roughly 800,000 households. Rates of need are slightly higher among households with members with a cognitive limitation (47%) or a limitation that affects a resident's ability to live independently (including self-care and independent living limitations, 44%). Total housing need among households containing at least one person living with a disability is projected to increase to roughly 897,000 by 2025.

## Current and Five-Year Needs Projections (Current and 2025)

Household Type	Current			2025
	Total Households	# of Households with Housing Need	% of Households with Need	# of Households with Housing Need
Extremely low-income families	948,105	847,405	89%	951,617
Low-income families	911,250	690,970	76%	775,944
Moderate-income families	1,297,630	735,090	57%	825,490
Middle-income families	739,240	266,815	36%	299,627
Renters	2,489,469	1,367,965	55%	1,536,194
Owners	4,811,026	1,172,315	24%	1,316,483
Elderly Households (HH contains at least one person 62+)	2,876,750	657,970	23%	738,886
Single person households	2,264,714	286,887	13%	311,151
Large families	494,690	150,365	30%	168,857
Households containing persons with hearing, vision, cognitive, ambulatory, self-care and independent living difficulty	1,859,430	798,484	43%	896,680

Data Source: 2000 Decennial Census, 2018 ACS, 1 year estimates (Most Recent Year), CHAS 2015

## Housing Needs Assessment Demographics

Demographics	Base Year: 2010	Most Recent Year: 2018	% Change
Population	18,801,310	21,299,325	13%
Households	7,420,802	7,809,358	5%
Median Income	\$44,409	\$55,462	25%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2010 Decennial Census (Base Year), 2018 ACS, 1 year estimates (Most Recent Year)

## Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	948,105	911,250	1,297,630	739,240	3,404,270
Small Family Households	283,120	289,745	458,660	284,610	1,583,385
Large Family Households	54,815	64,945	97,255	53,270	224,405

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Household contains at least one person 62-74 years of age	196,400	213,220	313,875	182,335	879,495
Household contains at least one person age 75 or older	159,460	200,095	238,740	111,760	381,370
Households with one or more children 6 years old or younger	143,825	135,965	183,610	99,875	323,230

**Table 3 - Total Households Table**

Data 2011-2015 CHAS  
Source:

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	11,680	9,415	7,265	3,440	31,800	4,100	3,745	3,875	2,290	14,010
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10,835	9,330	9,235	3,600	33,000	1,520	2,365	2,865	1,580	8,330

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	23,010	23,690	22,370	8,385	77,455	5,540	8,170	13,590	7,920	35,220
Housing cost burden greater than 50% of income (and none of the above problems)	343,550	214,150	66,860	7,660	632,220	226,345	164,260	132,890	40,120	563,615
Housing cost burden greater than 30% of income (and none of the above problems)	34,155	141,000	269,920	77,305	522,380	52,285	114,845	206,220	114,515	487,865
Zero/negative Income (and none of the above problems)	71,110	0	0	0	71,110	63,275	0	0	0	63,275

**Table 4 – Housing Problems Table**

Data 2011-2015 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen

or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	389,075	256,590	105,735	23,085	774,485	237,505	178,545	153,220	51,910	621,180
Having none of four housing problems	89,315	191,255	429,835	241,500	951,905	97,825	284,865	608,840	422,745	1,414,275
Household has negative income, but none of the other housing problems	71,110	0	0	0	71,110	63,275	0	0	0	63,275

Table 5 – Housing Problems 2

Data 2011-2015 CHAS  
Source:

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	158,275	165,670	152,515	476,460	67,985	77,365	129,705	275,055
Large Related	32,495	34,130	24,795	91,420	13,650	18,950	26,345	58,945

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	88,825	78,070	56,325	223,220	147,715	150,960	136,075	434,750
Other	135,320	113,545	120,930	369,795	57,115	40,220	54,615	151,950
Total need by income	414,915	391,415	354,565	1,160,895	286,465	287,495	346,740	920,700

**Table 6 – Cost Burden > 30%**

Data 2011-2015 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	148,800	93,810	25,200	267,810	58,865	52,275	49,780	160,920
Large Related	29,635	15,725	3,285	48,645	11,865	11,045	7,440	30,350
Elderly	71,520	48,725	16,795	137,040	113,025	78,420	53,565	245,010
Other	126,930	71,245	24,460	222,635	48,905	26,475	24,060	99,440
Total need by income	376,885	229,505	69,740	676,130	232,660	168,215	134,845	535,720

**Table 7 – Cost Burden > 50%**

Data 2011-2015 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	29,620	27,755	24,960	8,795	91,130	5,315	7,615	11,145	6,410	30,485

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	3,595	4,440	4,935	2,060	15,030	1,700	2,935	5,165	2,995	12,795
Other, non-family households	1,575	1,500	2,325	1,390	6,790	160	105	345	195	805
Total need by income	34,790	33,695	32,220	12,245	112,950	7,175	10,655	16,655	9,600	44,085

**Table 8 – Crowding Information – 1/2**

Data 2011-2015 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

**Table 9 – Crowding Information – 2/2**

**Describe the number and type of single person households in need of housing assistance.**

The number of single person households for the State of Florida is about 2.2 million. Of these single person households, 286,887 (or 13%) need housing assistance. This is based on the number of single person households living below the poverty level. In the next five years, the number of single person households in need of housing assistance is projected to grow to 311,151 households.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

**Persons with Disabilities.** In 2018, over 2.8 million Florida residents, 14 percent of the total state population, had at least one type of disability. Among residents 65 or older, about one-third (33%) have a disability. Seniors are most affected by physical (ambulatory and hearing) disabilities as well as self care disabilities (13%). Persons with disabilities are typically more vulnerable to housing discrimination than others, often due to housing providers’ lack of knowledge about reasonable accommodation provisions in fair housing laws. Persons with disabilities also face challenges finding housing that is

accessible and located near transit and supportive services. Respondents to the 2020 Florida Housing and Community Development Stakeholder Survey confirmed these issues persist among residents with disabilities in Florida. An estimated 23 percent of households living with a disability have a housing need—equal to 657,970 households—based on the housing problems (CHAS) data provided by HUD.

**Victims of domestic violence, dating violence, sexual assault and stalking.** According to the Centers for Disease Control (CDC), 37 percent of women and 34 percent of men aged 18 or older have experienced contact sexual violence, physical violence, or stalking by an intimate partner in their lifetime. Annual incidence rates—meaning the proportion of people who have experienced contact sexual violence, physical violence, or stalking by an intimate partner in the previous year—are 5.5 percent for women and 5.2 percent for men.

Applying these rates to the State of Florida’s women and men over 18 indicates that just over 914,000 Floridians over the age of 18 were victims of intimate partner or sexual violence in 2018. National statistics show that 3.6 percent of women and 1.0 percent of men experiencing intimate partner violence need housing services. Based on these rates, roughly 17,000 women and roughly 4,000 men over the age of 18 have housing service needs resulting from intimate partner violence (IPV).

Among respondents to the 2020 Florida Housing and Community Development Stakeholder Survey, 28 percent identified households who have experienced domestic violence as a population, which has disproportionately high housing needs relative to all low- and moderate-income populations overall.

Although the supportive and housing services needed by IPV victims vary, generally, all need health care and counseling immediately following the event and continued mental health support to assist with the traumatic stress disorder related to the event. Victims may also require assistance with substance abuse and mental health services, both of which are common among IPV victims. Affordable housing is also critical: The National Alliance to End Homelessness argues that a “strong investment in housing is crucial [to victims of domestic violence] ...so that the family or woman is able to leave the shelter system as quickly as possible without returning to the abuse.” The Alliance also reports that studies on homelessness have shown a correlation between domestic violence and homelessness ([http://www.endhomelessness.org/pages/domestic\\_violence](http://www.endhomelessness.org/pages/domestic_violence)).

### **What are the most common housing problems?**

The most prevalent housing problems in Florida are cost burden (spending more than 30% of income on housing) and severe cost burden (spending more than 50% of income on housing):

- HUD estimates that 1,154,600 renter households with low to moderate incomes experience cost burden. Nearly 2.1 million owner-occupied, low- to moderate-income households experienced cost burden. Among all low to moderate income households, nearly 64 percent of renters and over 50 percent of owners experienced cost burden.

- Over 632,000 low to moderate income renter households experience severe cost burden, 35 percent of all renters with incomes below 100 percent AMI. While there are fewer total low- to moderate-income owner-occupied households, a large number of owner occupied households experience severe cost burden (563,615 households). Severe cost burden is an acute challenge for those with extremely low incomes: 57 percent of extremely low-income owners and 63 percent of extremely low-income renters are severely cost burdened.
- Overall, 31,800 low to moderate income renter households and over 14,000 low- to moderate-income owner households experience substandard housing conditions (lacking complete plumbing or kitchen facilities).
- Overcrowding, defined as households with between one and 1.5 persons per room, affects 4 percent of low- to moderate-income renters, over 77,000 households, while severe overcrowding, defined as a household with over 1.5 persons per room, affects 2 percent of this income and tenure group, roughly 33,000 households. Overcrowding is less common among owner households, 2 percent compared to 4 percent among renter households, among low to moderate income owner households, which represents over 35,000 households. Severe crowding among low income owner households is even less common, 0.4 percent or over 8,000 households.

According to the 2020 Florida Housing and Community Development Stakeholder Survey, the following housing activities were identified as the most urgent housing needs in Florida. (The percentage signifies the proportion of respondents that considered it an urgent housing need).

- Rental units for extremely low income/poverty-level households (at 30% Area Median Income or AMI) (46%);
- Rental housing for very low-income households (60% AMI or less) (42%);
- Long-term tenant based rental assistance (40%);
- Homes for low- to moderate-income households to buy (60%-120% AMI) (35%);
- Rental housing for low to moderate-income households (80% AMI or less) (33%);
- Repurpose of vacant/underutilized properties into affordable housing (28%);
- Transitional housing for people moving out of homelessness (27%);
- Short-term tenant based rental assistance (25%);
- Long-term supportive services (23%);
- Emergency assistance to pay utilities (22%); and
- Housing for area workforce (19%).

### **Are any populations/household types more affected than others by these problems?**

Extremely low-income renters are more affected than other groups. As mentioned above, severe cost burden is disproportionately experienced by those with extremely low-income, income below 30 percent AMI. Around 64 percent of extremely low-income renter households experience severe cost burden. While there are fewer total low- to moderate-income owner households experiencing severe

cost burden (563,615 households), those with extremely low income suffer higher rates, 57 percent, comparable to renters in the same income category.

In the 2020 Florida Housing and Community Development Stakeholder Survey, respondents identified populations that they believed have disproportionately high housing needs as single parents (identified by 48% of respondents), people suffering from mental illness (43%), adults with criminal histories (felony convictions)(41%), seniors (40%), people of color (38%), people suffering from substance use disorders (35%), persons with physical disabilities (34%), persons with cognitive disabilities (30%), large families (5+ members)(29%), and households who have experienced domestic violence (28%).

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Severe cost burden (housing costs exceeding 50% of gross monthly income) among low and extremely low-income households puts households at risk of homelessness given their limited capacity to absorb external financial pressures. According to CHAS data, over 1.2 million households with income below 80 percent AMI were experiencing severe cost burden putting them at risk. A majority of these households (56% or 676,000 households) were renter households with 535,000 owner occupied households representing the remaining 46 percent. After housing and utility costs, other essential needs including transportation, childcare, healthcare and food may become financially inaccessible to these households, potentially causing additional health and security risks. These households have insufficient excess income that would allow them to save for future need, including unforeseen emergencies, or retirement. These factors put these households at a greater risk of making difficult decisions, weighing housing payments against essential needs payments. This increases their likelihood of eviction, default, foreclosure or other paths that may lead to homelessness.

According to the 2020 Florida Housing and Community Development Stakeholder Survey, permanently affordable housing stock and additional affordable housing stock were the most commonly identified needs among persons experiencing homelessness or who are at risk of becoming unsheltered (44% and 40% of respondents respectively). Other top needs included tenant based rental assistance (29%), rental assistance (27%) and transitional housing units (23%).

The survey also asked respondents who worked with households who have benefitted from rapid-rehousing programs, what the most pressing needs experienced by those nearing the termination of that assistance. The most prevalent need identified was a living wage job, as well as the necessary training and clothing to hold such a job (identified by 38% of respondents). Other needs identified included obtaining benefits (including Housing Choice Vouchers), learning money management skills,

financial assistance or more flexible options to overcoming barriers related to debt or credit, additional time to find housing (especially if the individual had past convictions).

Survey respondents also revealed that the ongoing health and economic crisis related to the COVID-19 pandemic increases the risk that individuals and families who are currently housed may become unsheltered or reside in a shelter. Many very low or extremely low-income households who lost employment during the crisis do not have adequate savings to pay for housing costs according to respondents. Respondents also acknowledged that because the crisis has hit service workers hardest these residents will be at the greatest risk. National indicators suggest these workers also disproportionately belong to minority racial and ethnic groups (National Bureau of Economic Research).

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Severe cost burden (housing costs exceeding 50% of gross monthly income) among low and extremely low-income households puts households at risk of homelessness given their limited capacity to absorb external financial pressures. HUD CHAS data provides data on households experiencing severe cost burden.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

As discussed above severe cost burden, paying over 50 percent of total income on housing related expenses, is linked with instability and increased risk of homelessness. Other characteristics that are linked with instability and increased risk of homelessness include domestic violence, unstable employment, and increased risk of health issues all of which may force unexpected and sudden increased costs or decreased income on a household that does not have sufficient income to weather.

**Discussion**

The state's housing and community development needs have been substantially impacted by multiple hurricanes causing significant damage over the past five years:

- In September 2016 and October 2016, Florida was impacted by two hurricanes, resulting in storm surge and high winds. Hurricane Hermine made landfall along the Big Bend area of the state. Hurricane Matthew traveled up the entire eastern coastline, eventually making landfall about 30 miles north of Charleston, South Carolina.

- Hurricane Irma made landfall in the state of Florida on September 10, 2017, causing significant damage to the Florida Keys and peninsula of the state. This resulted in the exacerbation of impacts in some communities that were also hit by hurricanes Hermine Matthew.
- In October of 2018, Hurricane Michael caused unprecedented damage to housing, business and infrastructure in Florida's Panhandle.

The state received Community Development Block Grant - Disaster Recovery (CDBG-DR) funding to help address housing, economic and infrastructure damage from these storms. Specific needs and implementation plans are discussed in detail in the CDBG-DR Action Plans for Hurricane Michael, Hurricane Irma, and Hurricanes Hermine and Matthew. A brief summary of the "impact and unmet needs assessments" from those Action Plans is included below.

**Hermine/Matthew:** Estimated total impacts from Hermine and Matthew was about \$1.4 billion and total estimated unmet needs topped \$494 million. (HUD calculates "unmet housing needs" as the number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA). The CDBG-DR Action Plan analysis indicated that the housing sector had the most unmet need (68% of total need), followed by the infrastructure sector (25%) and economy (6%), indicating that any program focused on housing recovery will have a high impact on overall recovery across the state.

**Irma:** Estimated total impacts from Irma was about \$16.5 billion across the housing, infrastructure and economic sectors and total estimated unmet needs topped \$10.3 billion. Evidence in the wake of the storm indicated that the housing sector had the most remaining unmet need (65%), followed by the economy (27%) and infrastructure (8%), indicating that any program focused on housing recovery will have a high impact on overall recovery across the state.

**Michael:** Substantial impacts from Hurricane Michael produced significant unmet needs across Florida's panhandle. Although each county within the presidentially declared disaster area is still recovering, those directly impacted by Hurricane Michael's storm surge at landfall (Bay, Gulf and Jackson counties) had the largest impacts and remaining unmet needs. Unlike the hurricanes of 2016 and 2017, which largely affected households, Hurricane Michael's strength also took a heavy toll on the region's infrastructure and economy. Significant resources will be required to rebuild and replace damaged homes and communities and ensure their resiliency to future natural disasters. HUD-defined "unmet needs" resulting from Hurricane Michael total \$10.4 million. Sixty percent of unmet needs are in the economic sector, 35 percent are in housing and 4 percent relate to infrastructure.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

The data in this section are pre-populated by HUD and reflect the 2011-2015 CHAS dataset (the most recent data available for Consolidated Planning) which breaks households down by race, ethnicity, income and housing problems.

The largest population group in the state remains residents who report their race and ethnicity as non-Hispanic white, representing 58 percent of the state’s total population. Hispanic residents comprise over a quarter of the state’s residents (26%) while African American residents are the second most prominent minority group representing 16 percent of the population. Although Asian residents and residents who identify belonging to two or more races represent far less of the total population (both 2%) both groups experienced significant percentage growth since 2010 (31% and 30% respectively).

### Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a particular income level experience at least one problem at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60 percent of all low-income households within a jurisdiction have a housing problem and 72 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need (12 percentage point difference).

Per the regulations 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

Income classifications are as follows: 0%-30% AMI is considered extremely low-income, 31%-50% AMI is very low-income, 51%-80% AMI is low-income and 81%-100% is moderate-income.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	712,941	100,582	134,323
White	322,899	51,282	75,662
Black / African American	169,378	19,743	27,787
Asian	11,876	1,431	3,357
American Indian, Alaska Native	2,009	356	425

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	195	10	77
Hispanic	196,277	26,378	25,578

**Table 10 - Disproportionally Greater Need 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	690,893	220,159	0
White	343,870	148,258	0
Black / African American	132,505	27,362	0
Asian	10,624	3,468	0
American Indian, Alaska Native	1,532	565	0
Pacific Islander	387	70	0
Hispanic	192,581	37,789	0

**Table 11 - Disproportionally Greater Need 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	734,963	562,482	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	393,231	372,158	0
Black / African American	128,032	73,562	0
Asian	13,435	9,513	0
American Indian, Alaska Native	1,214	1,170	0
Pacific Islander	366	151	0
Hispanic	187,840	99,414	0

**Table 12 - Disproportionally Greater Need 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	266,868	472,360	0
White	158,670	310,185	0
Black / African American	37,180	63,543	0
Asian	5,886	8,365	0
American Indian, Alaska Native	566	927	0
Pacific Islander	197	255	0
Hispanic	60,193	82,629	0

**Table 13 - Disproportionally Greater Need 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Discussion

#### Extremely Low-income: 0-30 Percent of Area Median Income

- All groups have relatively high rates of housing problems, but no single group experiences a disproportionately high rate of need relative to the jurisdiction as a whole. At this income level, 88 percent of all households have at least one of the four housing problems.

#### **Very Low-income: 30-50 Percent of Area Median Income**

- Similar to the 0-30% AMI income level, all households in this income group have relatively high rates of housing need (76% overall). Black households and Hispanic households experienced disproportionately high rates of housing need (83% and 84% respectively) compared to White households (70%). Pacific Islander households also experience disproportionately high rates of housing need (85%) compared to White households (77%).

#### **Low-income: 50-80 Percent of Area Median Income**

- At this income level, 57 percent of households experienced housing need. Black households and Hispanic households experienced disproportionately high rates of housing need (64% and 65% respectively) compared to White households (51%). Pacific Islander households also experience disproportionately high rates of housing need (71%) compared to White households (77%).

#### **Moderate Income: 80-100 of Area Median Income**

- At this income level, 35 percent of households experienced housing need. Pacific Islander households also experience disproportionately high rates of housing need (48%) compared to White households (35%).

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

This section discusses severe housing needs as defined by HUD, using HUD-provided housing needs data. The tables show the number of Florida households that have severe housing needs by income, race, and ethnicity. Severe needs are defined as one or more of the following housing problems:

- Housing lacks complete kitchen facilities;
- Housing lacks complete plumbing facilities;
- Household has more than 1.5 persons per room; and
- Household cost burden exceeds 50 percent.

As in the previous section, a disproportionately greater need exists when the members of a racial or ethnic group at a particular income level experience at least one severe housing problem at a greater rate (10 percentage points or more) than the income level as a whole.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	626,510	187,054	134,323
White	281,061	93,132	75,662
Black / African American	150,113	39,046	27,787
Asian	10,397	2,908	3,357
American Indian, Alaska Native	1,785	576	425
Pacific Islander	150	55	77
Hispanic	173,602	48,977	25,578

**Table 14 – Severe Housing Problems 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	435,179	476,058	0
White	210,270	281,765	0
Black / African American	83,624	76,245	0
Asian	6,942	7,126	0
American Indian, Alaska Native	941	1,155	0
Pacific Islander	298	159	0
Hispanic	126,879	103,354	0

**Table 15 – Severe Housing Problems 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	259,136	1,038,572	0
White	142,549	623,173	0
Black / African American	39,415	162,260	0
Asian	6,167	16,775	0
American Indian, Alaska Native	431	1,970	0
Pacific Islander	190	322	0
Hispanic	66,608	220,763	0

**Table 16 – Severe Housing Problems 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	74,855	664,095	0
White	42,411	426,301	0
Black / African American	10,351	90,320	0
Asian	1,941	12,345	0
American Indian, Alaska Native	253	1,240	0
Pacific Islander	45	402	0
Hispanic	18,434	124,438	0

**Table 17 – Severe Housing Problems 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

This section discusses the income categories in which a racial or ethnic group has a disproportionately greater severe housing need.

### Extremely Low-income: 0-30 Percent of Area Median Income

- At this income level, 77 percent of households experienced severe housing problems. Although no racial or ethnic group experienced disproportionately high housing need, need was high (between 73% and 79%) across all groups.

### Very Low-income: 30-50 Percent of Area Median Income

- At this income level, 48 percent of households experienced severe housing problems. Hispanic households experienced disproportionately high rates of severe housing needs (55%) compared to White households (43%). Pacific Islander households also experience disproportionately high rates of housing need (65%) compared to White households (43%) and the state overall (48%).

### Low-Income: 50-80 Percent of Median Income

- At this income level, 20 percent of households experienced severe housing problems. Pacific Islander households also experience disproportionately high rates of housing need (37%) compared to White households (19%) and the state overall (20%).

**Moderate Income: 80-100 of Area Median Income**

- At this income level, rates of severe housing problems were relatively low (between 9 and 17%) with an overall state rate of 10 percent. No racial or ethnic group experienced disproportionately high rates of severe housing needs.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

This section provides data on households with disproportionate levels of housing cost burden. Housing cost burden occurs when households pay more than 30 percent of their gross household income toward housing costs, which includes utilities. Severe housing cost burden occurs when housing costs are 50 percent or more of gross household income.

As in the previous section, a disproportionately greater need exists when the members of a racial or ethnic group at a particular income level experience at least one severe housing problem at a greater rate (10 percentage points or more) than the income level as a whole.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	4,455,882	1,384,742	1,318,864	140,653
White	3,153,093	784,032	680,217	78,388
Black / African American	454,373	224,450	253,576	29,759
Asian	98,714	26,396	23,537	3,451
American Indian, Alaska Native	8,601	2,490	3,131	482
Pacific Islander	1,723	552	519	77
Hispanic	686,438	327,924	338,486	26,923

**Table 18 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

### Discussion

In the state of Florida overall, 38 percent of households experience cost burden according to HUD's 2011-2015 CHAS data (19% experience moderate housing cost burden and 18% experience severe housing cost burden). Both Black households and Hispanic households experience overall housing cost burden (including all household with housing costs over 30% of household income) at disproportionately high rates (51% and 49% respectively) compared to White households (32%).

## **NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

According to the HUD tables in the previous three sections, disproportionate housing needs exist for the following groups:

- Black households experience disproportionate housing needs relative to White households at the 30%-50% AMI and 50%-80% AMI income levels.
- Black households also experience housing cost burden at disproportionately high rates (51%) compared to White households (32%).
- Hispanic households experience disproportionate housing needs relative to White households at the 30%-50% AMI and 50%-80% AMI income levels and experience severe housing problems disproportionately compared to white households at the 30%-50% AMI income level.
- Hispanic households also experience housing cost burden at disproportionately high rates (49%) compared to White households (32%).
- Pacific Islander households experience disproportionate housing needs relative to White households at the 30%-50% AMI and 50%-80% AMI income levels and have disproportionate needs relative to the state as a whole at the 80%-100% AMI income group.
- Severe housing needs were experienced disproportionately by Pacific Islander households relative to White households and the state overall at the 30%-50% AMI and the 50%-80% AMI income levels.

### **If they have needs not identified above, what are those needs?**

In addition to the housing needs identified above, a fair housing analysis conducted for the state of Florida identified disparities in home ownership and access to community assets for people of color. According to 2018 ACS data, 69% of non-Hispanic white households in Florida were owners, compared to 58% of Asian households, 47% of Hispanic households and 42% of Black/African American households. HUD data on opportunity indicators show that African American, Hispanic, and Native American households in non-entitlement areas have lower exposure to areas with proficient schools and high labor market engagement than their white counterparts in the same areas.

### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Maps of the distribution of residents by race/ethnicity were prepared for the State of Florida Fair Housing Analysis, conducted in conjunction with the Consolidated Plan. These maps identified concentrations of racial/ethnic groups based on the following criteria:

- Census tracts in which the proportion of a protected class is 20 percentage points higher than that in the county overall; and

- Census tracts that are more than 50 percent minority—minority residents defined as those identifying as Hispanic/Latino and/or a non-white race.

According to that analysis, the following concentrations are evident:

- There are 381 Census tracts (9% of all tracts in Florida) with concentrations of Hispanic residents. Of these, seven Census tracts are in non-entitlement areas.
- There are 468 Census tracts (11% of all tracts in Florida) with concentration of African American residents. Of these, 20 Census tracts are completely within non-entitlement areas.
- There are two Census tracts with concentration of Asian residents. Of these, no Census tracts are completely within non-entitlement areas.
- There are 1,489 Census tracts (35% of all tracts in Florida) that have a concentration of 50% or more minority population (any resident that is not non-Hispanic white). Of these, 40 Census tracts are in non-entitlement areas.

## NA-35 Public Housing – (Optional)

### Introduction

According to the Shimberg Center for Housing Studies' Affordable Housing Data Clearinghouse, there are 2,681 publicly assisted developments provided 285,010 affordable housing units statewide through a variety of funding sources including the Florida Housing Finance Corporation, local housing finance authorities, the United States Department of Agricultural Rural Development, the HUD Multifamily program and HUD Public Housing.

Neither the Small Cities CDBG, HOPWA, nor ESG, provide funding to PHAs in Florida. Even so, data are provided in this optional section to offer additional context to the housing needs discussed in the Consolidated Plan. Data are based on HUD's Picture of Subsidized Households for the state of Florida.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based (Section 8)	Tenant-based (Housing Choice)	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units/ vouchers in use		2,493	29,892	153,694	42,473	111,221			

**Table 19 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: Picture of Subsidized Households: 2018

### Characteristics of Residents (Total Households)

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based (Section 8)	Tenant-based (Housing Choice)	Veterans Affairs Supportive Housing	Family Unification Program	
# of Elderly Participants >62)		1,830	10,852	50,469	21,623	28,845			
# of Disabled Families		3,661	25,321	113,178	14,280	98,898			

**Table 20 – Characteristics of Public Housing Residents by Program Type**

Data Source: Picture of Subsidized Households: 2018

### Race of Residents (Total Households)

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based (section 8)	Tenant-based (Housing Choice)	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White		1,620	11,658	63,339	19,962	43,376			
Black/African American		1,124	16,695	80,794	17,952	62,842			
Asian or Pacific Islander		0	0	408	408	0			
American Indian/Alaska Native		0	0	0	0	0			
Multiple Race		0	0	425	425	0			

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 21 – Race of Public Housing Residents by Program Type**

Data Source: Picture of Subsidized Households: 2018

### Ethnicity of Residents (Total Households)

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based (Section 8)	Tenant-based (Housing Choice)	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic		1,959	8,069	39,433	12,648	26,785			

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 22 – Ethnicity of Public Housing Residents by Program Type**

Data Source: Picture of Subsidized Households: 2018

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

Not applicable—the state of Florida does not directly maintain or manage public housing.

**What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

Not applicable—the state of Florida does not directly administer vouchers but operates through local partnerships to manage Tenant Based Rental Assistance (TBRA). Broadly speaking, the most immediate need of residents on the waiting list for vouchers is finding rental units that meet their needs and accept their voucher.

**How do these needs compare to the housing needs of the population at large**

The Shimberg Center for Housing Studies' 2019 Market Study compares households living in publicly assisted housing units with those of the rental market overall in the state of Florida. Households in publicly assisted units are more likely to be lower income and are more likely to be either households with children or elderly residents than the overall rental population. These populations are likely to have unique needs aside from their economic constraints including neighborhood access to good schools (for households with children), access to transportation and medical care (elderly) and accessible housing units (elderly have a higher incidence of disability overall).

**Discussion:**

According to the tables above, there are roughly 11,000 elderly households (39%) in public housing and roughly 50,000 elderly households (74%) in voucher programs (section 8 or housing choice) in Florida. Households with a head, co-head or spouse living with a disability make up 85 percent of the total households in public housing in Florida. This group accounts for 74 percent of the total vouchers. Roughly half of all public housing households are Black households (56%), 29 percent identify as Hispanic households and 12 percent identify as non-Hispanic White households. There are similar racial and ethnic disparities among total voucher recipients. Roughly half of all voucher holding households are Black households (53%) compared to 26 percent among Hispanic households and 17 percent non-Hispanic White households.

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

This section summarizes the HUD 2019 Continuum of Care report that is based on point-in-time information provided to HUD by Continuums of Care (CoCs). The Point-in-Time (PIT) Counts occurs annually in January and attempt to provide a snapshot of both sheltered and unsheltered homeless people. In January 2019, data was collected by volunteers in Florida regarding the number of unsheltered homeless people living on the street as well sheltered homeless people living in a range of shelters including emergency shelters and transitional housing throughout the state. Researchers also collected demographic data including age, gender, race, ethnicity, veteran status and disability status of this population.

The 2019 PIT identified over 28,000 people experiencing homelessness in Florida. Just over half (56%, 15,852 people) were sheltered while the remaining were 12,476 were unsheltered (44%). Total homeless persons identified in the PIT has been declining in recent years (from 35,900 in 2015). However, some estimate indicate a rise in the number of families with children experiencing homelessness, when including both PIT data and estimates from Florida Department of Education’s homeless student count, which includes families doubled up with others in hotels and motels. Much of this increase is driven by families displaced by hurricanes since 2016.

### Homelessness Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	1,164	5,899				
Persons in Households with Only Children	44	212				
Persons in Households with Only Adults	11,268	9,741				
Chronically Homeless Individuals	3,704	1,453				
Chronically Homeless Families	184	388				

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessnes s each year	Estimate the # of days persons experience homelessn ess
	Unshelte red	Shelter ed				
Veterans	1,576	896				
Unaccompanied Youth	545	905				
Persons with HIV	153	352				

**Table 26a– Homelessness Needs**

Data Source: HUD 2019 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

**Indicate if the homeless population is All Rural Homeless, Partially Rural Homeless, Has No Rural Homeless.**

**Homelessness Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessnes s each year	Estimate the # of days persons experience homelessn ess
	Unshelte red	Shelter ed				
Persons in Households with Adult(s) and Child(ren)	182	253				
Persons in Households with Only Children	37	39				
Persons in Households with Only Adults	1,655	639				
Chronically Homeless Individuals	511	26				
Chronically Homeless Families	62	8				
Veterans	126	134				

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessnes s each year	Estimate the # of days persons experience homelessn ess
	Unshelte red	Shelter ed				
Unaccompanied Youth	37	39				
Persons with HIV	0	0				

**Table 26b– Rural Homelessness**

Data Source: Continuums of Care (CoCs)

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

One in five homeless individuals were chronically homeless (5,729 individuals) according to the 2019 PIT count. The night of the PIT count about two in three (68%) homeless individuals were unsheltered with only 1,841 sheltered on the night of the count. People living in households with children represented 10 percent of the chronically homeless individuals (548 individuals) of whom only 70 percent were sheltered. There were 24 total chronically homeless children living without adults, 21 of whom were unsheltered.

While adults living alone represented a majority (74%) of all individuals experiencing homelessness (21,009 individuals), there were over 7,000 individuals living with adults and children (25%) and 256 children living without adults (1%).

There were 2,472 veterans living in homelessness in Florida during the count in 2019. Veterans represent 9 percent of all homeless individuals. Sixty-four percent of veterans (1,576 individuals) were unsheltered.

Among other sub populations, there were nearly 5,000 individuals (17% of the entire homeless population) suffering from severe mental illness who were homeless. The majority (53%) of these individuals with severe mental illnesses were unsheltered. Many homeless individuals suffered from chronic substance abuse, nearly 4,000 total, among whom 49 percent were unsheltered. Victims of

domestic violence were also counted among those experiencing homelessness in 2019. Seven percent of individuals experiencing homelessness were victims of domestic violence, a total over 2,000 individuals. Finally, individuals who were living with HIV/AIDS and were homeless represented 2 percent of the total population of homeless individuals, a total of 505 individuals.

**Nature and Extent of Homelessness: (Optional)**

**Homelessness**

	<b>Total</b>	<b>Sheltered</b>	<b>Unsheltered</b>
Race:			
White	15,580	7,655	7,925
Black or African American	11,555	7,528	4,047
Asian	108	75	33
American Indian or Alaska Native	233	58	175
Native Hawaiian or other Pacific Islander	92	50	42
Multiple Races	740	486	254
Ethnicity:			
Hispanic	3,696	2,380	1,316
Not Hispanic	24,632	13,472	11,160

**Table 27– Homelessness and Race/Ethnicity**

**Data Source:** 2019 Point-in-Time Homeless Count

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

According to the January 2019 PIT count, there were over 4,000 individuals experiencing homelessness of all ages living in families. Of the total number individuals in families living with children, 16 percent were unsheltered. Over 6,100 individuals in families with children and children living alone were sheltered on the night of the count in 2019. According to Florida State Council on Homeless annual report from 2019, the number of unsheltered families experiencing homelessness declined between 2015 and 2019.

The 2019 PIT identified nearly 2,500 veterans, most of whom (64%) were unsheltered.

One inherent limitation to the Point in Time methodology is that the numbers represented in the count do not necessarily represent a full picture of the extent of Florida homelessness. The McKinney-Vento

Act definition of homelessness (Subtitle VII-B) more broadly accounts for the traumatic impact of loss of housing on children and youth and the impact of that trauma on their education and development. This definition includes those children and youth in families that are unsheltered or staying in public shelters or transitional housing, as well as those who have had to move in with relatives or friends or to a motel or hotel or a camp site or travel trailer park or a FEMA trailer, because they have nowhere else to go. Schools identify homelessness throughout the school year and not just on a single night as the Point-In-Time count does.

Children and youth whose families lose their housing and move in with family or friends (“doubled up”) are considered homeless under the McKinney-Vento Homeless Assistance Act. According to the Florida Department of Education data which uses the McKinney-Vento standards, 76.8% of the 95,860 homeless students identified by Florida’s schools in 2017-2018 are doubled up with family or friends. The next largest proportion includes students living in motels (11.6%). Students living in shelters only accounts for 8.6% of the total homeless students counted during the 2017-2018 school year.

### **Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

During the January 2019 PIT count, nearly 3,700 individuals living in homelessness identified as Hispanic or Latino (13% of all individuals experiencing homelessness). Among racial identities, the majority of individuals living in homelessness identified as White (55%), 41 percent identified as Black or African American, 1 percent identified as Native American, and individuals who identified as either Asian or Native Hawaiian/Pacific Islander each represented less than 1 percent of the total. Based on 2018 American Community Survey (ACS) population estimates for 2018, Black or African American individuals are overrepresented among the population living in homelessness. Black or African American residents make up only 16 percent of Florida’s total population and 41 percent of the homeless population (11,555 individuals). Conversely White individual and Hispanic individuals are underrepresented.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Over 12,000 individuals or 44 percent of all Floridians experiencing homelessness were unsheltered. Of the total number of individuals in families living with children, 16 percent or nearly 5,900 individuals were unsheltered. A similarly low percent of only children families were unsheltered (17%). The unsheltered rate was much higher (46%) among adults in households without children.

Among racial and ethnic groups living in homelessness, the unsheltered rate was highest among those who identified as Native American (75% or 175 individuals). Overall 44 percent of all individuals experiencing homelessness were unsheltered. The lowest unsheltered rates were among those who identified as Asian or Black or multiple races (31%, 35%, and 34% respectively).

Of the nearly 2,500 veterans living in homelessness, 36 percent or 896 individuals were unsheltered during the January 2019 PIT count. Over one in two homeless individuals who were experiencing severe mental illness were unsheltered (over 2,600 individuals). Of the over 2,000 victims of domestic violence experiencing homelessness, 46 percent (941 individuals) were unsheltered.

## Discussion:

The number of individuals experiencing homelessness in Florida has been decreasing. Between 2015 and 2019, individuals experiencing homelessness has decreased by over 7,300 individuals or roughly 20 percent. The number of unsheltered individuals has also been on the decline. During the January 2019 count, 44 percent of individuals experiencing homelessness were unsheltered, meaning their primary nighttime residence is a public place not meant for human habitation, including but not limited to: street or sidewalk, vehicle, park, abandoned building, garage, bus/train station, under a bridge or overpass, the woods or outdoor camp. One in five individuals experiencing homelessness in Florida are chronically homeless.

Data available through the Florida Department of Education (FDOE) reveals that student homelessness, when taken to include forms of homelessness other than sheltered or unsheltered (including doubling up or living in a motel), is a much greater issue than Point-In-Time numbers may represent.

Significant hurricanes in 2016, 2017 and 2018 (discussed in more detail in NA-10 and in the state's CDBG-DR Action Plans) contributed to instability for many families and is thought to be a driver in family homelessness captured in the FDOE data. Collectively, Hurricanes Hermine, Matthew, Irma and Michael created \$346 million in unmet housing need (HUD calculates "unmet housing needs" as the number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA).

According to the 2020 stakeholder survey of community service providers in Florida, permanently affordable housing stock and additional affordable housing stock were the most commonly identified housing needs among persons experiencing homelessness or who are at risk of becoming unsheltered (44% and 40% of respondents respectively). Other top needs included tenant based rental assistance (29%), rental assistance (27%) and transitional housing units (23%).

The survey also identified specific populations experiencing homelessness that have the greatest unmet housing or supportive service needs. Stakeholders identified individuals with mental health challenges as having the greatest unmet need (51% of respondents), followed by individuals with criminal histories (39%), single men without children (38%), persons who are chronically homeless (34%), families with children (32%), individuals with substance use disorders (29%) and women with children (29%).

## NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

### Introduction

This section describes the housing needs of non-homeless special needs populations in Florida, including:

- Elderly and frail elderly residents;
- People with physical and developmental disabilities;
- People with alcohol or drug addictions;
- Domestic violence victims/survivors;
- People with HIV/AIDS; and
- Migrant/seasonal farmworkers

Data in the first two tables are provided by HUD; the remainder of the section uses a customized model to estimate the population, characteristics and needs of non-homeless special populations in Florida.

### HOPWA

<b>Current HOPWA formula use:</b>	
Cumulative cases of AIDS reported	140,514
Area incidence of AIDS	58,923
Number of new cases prior year (3 years of data)	6,401
Rate per population (100,000)	322.5
Rate per population (3 years of data)	325.4
<b>Current HIV surveillance data:</b>	
Number of Persons living with HIV (PLWH)	110,907
Area Prevalence (PLWH per 100,000 population)	607
Number of new HIV cases reported last year	4,586

**Table 23 – HOPWA Data**

Data Source: CDC HIV Surveillance

### HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	200
Short-term Rent, Mortgage, and Utility	1,000
Facility Based Housing (Permanent, short-term or transitional)	100

**Table 24 – HIV Housing Need**

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

## Describe the characteristics of special needs populations in your community:

- **Elderly and Frail Elderly.** The proportion of older adult residents has increased from 17 percent in 2010 to 20 percent in 2018. According to forecasts by the Bureau of Economic and Business Research at the University of Florida, the proportion of older resident will continue to grow with estimates suggesting that the proportion of older adults will be one in four Florida residents in 2045. CHAS data from 2015 revealed that nearly one in four older adult residents in Florida experienced housing cost burden. This number of total elderly households experiencing cost burden is expected to increase to nearly 700,000 households. The growing proportion of older residents in Florida present significant housing, health and social services, as well transportation related challenges, particularly in rural areas where services may already be limited, as older residents are more likely to experience mobility and other independent living/physical disabilities.

There is also a significant number of frail elderly residents in Florida. Frail elderly (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking and performing light housework) is analyzed here as residents over 65 years of age who have an independent living difficulty. There are over 560,000 such elderly frail residents in Florida, representing 13 percent of the total population of residents over 65 years of age.

- **People with Physical and Developmental Disabilities.** Statewide, 14 percent of all residents (over 2.8 million residents) live with a disability. Not surprisingly, a higher percentage of seniors (resident who are 65 and over) live with at least one disability (33% or over 1.4 million residents). Among the senior population, ambulatory, hearing and independent living disabilities are the most common. One in five Florida residents over the age of 65 year has an ambulatory disability, 13 percent live with a hearing disability, 13 percent live with an independent living disability and 7 percent live with a self-care disability. Among working age adults 18 to 65 years of age, ambulatory disabilities are the most prevalent (5% of the age cohort), affecting nearly 600,000 residents. Over 10 percent or roughly 1.25 million residents in this age cohort live with at least one disability.
- **People with Alcohol or Drug Addictions.** In Florida, according to the 2017 SAMHSA report for Florida, NSDUHs for 2017 to 2018, 1.71 million Florida residents aged 12 years or older have a substance use disorder (6.5% of the population 12 and older). That rate is lower than the national rate of 7.5 percent. Specifically for alcohol use disorders, the rate was 4.5% (representing over 800,000 individuals) and the rate for illicit drug use disorders was 2.9 percent (representing over 520,000 individuals). Note that some of the people who are dependent on or abuse alcohol are also dependent on or abusing drugs, indicating some duplication in these numbers.
- **People with HIV/AIDS.** According to the CDC HIV Surveillance Report from 2018, there were 110,907 people living with HIV in Florida by the end of 2018. In 2018, more than 4,500 new cases were diagnosed. Rates of people living with HIV in Florida are three times higher among Black residents and two times higher among multiracial residents than among the population as whole. Among Hispanic residents the rate was comparable to that of the state as a whole (607 per 100,000 residents).

- **Victims of domestic violence.** According to the 2015 Center for Disease control report titled “The National Intimate Partner and Sexual Violence Survey,” annual incidents of contact sexual violence, physical violence or stalking with intimate partner violence-related impact was 5.5 percent for women and 5.2 percent for men. Based on the incidence rates and the 2018 population data for the state of Florida, a rough estimate of just over 914,000 Floridians over the age of 18 were victims of intimate partner or sexual violence in 2018.
- **Migrant/seasonal farmworkers.** There are 113,354 migrant and seasonal farmworkers in Florida, including people working temporarily under the federal H-2A visa program. These workers are concentrated in the state’s southwestern counties (fruit and vegetable agriculture) and southeastern counties (sugar cane and nursery operations).

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

- **Elderly and Frail Elderly.** According to CHAS data, among households that contain at least one person 62 years of age or older 30 percent or roughly 658,000 households are cost burdened and experience housing need, paying over 30 percent of their income on housing costs. Based on annualized population trends, the need among elder households may increase to roughly 738,000 by 2025.

According to the Florida Affordable Housing Inventory, last updated in 2019, there were a roughly 285,000 units of affordable housing throughout the state, 30 percent of which were targeted elderly residents.

- **People with Disabilities.** Housing needs are high (43%) among households with members experiencing at least one disability. This represents nearly 800,000 households. Rates of need are slightly higher among households with members with a cognitive limitation (47%) or a limitation that affects a resident’s ability to live independently (including self-care and independent living limitations, 44%).

Of the roughly 285,000 units of affordable housing throughout the state, 2 percent of the total restricted units were target to residents with disabilities (4,871 units). This population however is also served by LINK initiative, which refers to units funded by Florida Housing and set aside for extremely low-income households with special needs (homeless, domestic violence survivors, persons with a disability, youth aging out of foster care). While units with this target are not exclusively targeted to persons with disabilities, they represent a larger proportion of the total assisted units (14% or over 40,000 units).

According to the stakeholder survey conducted for the Consolidated Plan, 78 percent of respondents believed that there are an insufficient number of accessible units in their service areas. ADA accessible first floor units, group living units with peer support services and affordability were commonly identified as the types of units that are needed to fill this gap. Respondents also acknowledged that current policies and practices don’t necessarily support the

increased access to such units. When asked “How well do state and local policies and practices support community living and the ability of people with disabilities to live in the most integrated, independent setting they prefer?”, not quite one in three (32%) answers “very well” or “moderately well,” while 49 percent of respondents responded “not well”. Among those who believed that policies and practices were insufficient, affordability, proportions of accessible units in new developments, and access to information were commonly cited as contributing to their evaluation.

- **People with HIV/AIDS.** For low income persons with HIV/AIDS, the challenge of finding affordable housing is increased by their need of medical attention and special HIV/AIDS treatment and housing is the key component to their stability and staying permanently housed. Similar to the homeless population, rental assistance can provide housing and services on where they are now in terms of all their needs. Services provided by a Care Coordination Program is one way to provide all services that a person may need during the time of diagnosis, treatment, services and housing options.
- **Victims of domestic violence.** Although the supportive and housing services needed by intimate partner violence (IPV) victims vary, generally, all need health care and counseling immediately following the event and continued mental health support to assist with the traumatic stress disorder related to the event. Victims may also require assistance with substance abuse and mental health services, both of which are common among IPV victims. Affordable housing is also critical: the National Alliance to End Homelessness argues that a “strong investment in housing is crucial [to victims of domestic violence]...so that the family or woman is able to leave the shelter system as quickly as possible without returning to the abuse.” The Alliance also reports that studies on homelessness have shown a correlation between domestic violence and homelessness.

Domestic violence can have lasting health effects. The 2010 CDC survey found that IPV victims were more likely to report frequent headaches, chronic pain, difficulty sleeping, activity limitation, poor physical health and poor mental health, at rates higher than those who did not experience IPV violence. The long-term health costs of IPV is unclear, because it is difficult to separate out health care problems that are directly related to IPV. It is likely, though, that the negative impacts of IPV are felt throughout the broader community in health care costs, missed time at work and school and lasting psychological effects on children and victims.

- **Migrant/seasonal farmworkers.** There are two types of housing reserved for migrant/seasonal farmworkers: farmworker multifamily developments and migrant camps. The 2019 Rental Market Study estimates need by comparing the supply of migrant camp beds to unaccompanied workers and the supply of farmworker multifamily units to accompanied workers. That analysis identifies a need for 29,235 additional migrant camp beds and 31,040 additional farmworker multifamily units.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

According to the CDC HIV Surveillance Report from 2018, there were 110,907 people living with HIV in Florida by the end of 2018. In 2018 over 4,500 new cases were diagnosed. Rates of people living with HIV in Florida are 3 times higher among Black residents and 2 times higher among multiracial residents than among the population as a whole. Among Hispanic residents the rate was comparable to that of the state as a whole (607 per 100,000 residents).

**Discussion:**

As discussed above, non-homeless special needs populations include elderly and frail elderly residents, people with physical and developmental disabilities, residents with mental illness, people with alcohol or drug addictions, and people with HIV/AIDS. These populations in aggregate represent a significant number of Florida residents.

## **NA-50 Non-Housing Community Development Needs - 91.315 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

As part of the stakeholder survey conducted for the Consolidated Plan, respondents identified top unmet community development needs in their communities. The most common facility-based need identified by stakeholders was affordable childcare or early learning centers in the state—half of the stakeholder survey respondents identified such centers as a top unmet community development need for Florida residents. Other facilities like public libraries, community centers, parks and recreation facilities, as well as public safety support facilities (e.g., fire stations, police stations) were also identified as needs by stakeholder but were less common (8% to 14% of stakeholders identified these facilities as top unmet community development needs).

Though not directly related to public facilities, “limited capacity of nonprofits” was the number one unmet community development need identified by stakeholders. In that regard, public facilities that contribute to non-profit capacity would be prioritized by stakeholders. This could include public health centers (particularly those delivering needed medical services related to COVID-19), subsidized non-profit office space, etc.

### **How were these needs determined?**

Stakeholder consultation through public hearings and a survey. The stakeholder survey was conducted with 187 respondents representing a range of community development, housing, and service providers in the state of Florida. Among other questions related to housing and community development, respondents were asked “What are the top five greatest unmet community development needs in your service area?” and were provided with a list of common services, facilities and improvements as well as the opportunity to submit their own answer.

### **Describe the jurisdiction's need for Public Improvements:**

According to the stakeholder survey, public improvements were identified as important to meeting community development needs. Sixty-one percent identified public transit as a top five unmet community development need and 20 percent ranked public transit as the number one unmet community development need. Roughly half identified street/road infrastructure as a top unmet need; however, few (5%) identified such improvements as a number one priority. Water and sewer infrastructure, on the other hand, was also identified at a top unmet need by nearly half of the respondents (45%) and nearly one in five (17%) ranked it as the number one priority. Other public improvement needs including infrastructure for internet access, lack of sidewalks/sidewalk improvements, flood drainage infrastructure and stormwater infrastructure were identified by between 30 percent and 36 percent of respondents at to unmet community development needs.

Needs were also identified by reviewing third party publications related to the state's infrastructure. As Identified in the 2016 Report Card of America's Infrastructure for the State of Florida (the most recent report available) prepared by the American Society of Civil Engineers (ASCE), Florida's infrastructure

received a “C” grade, meaning that overall the conditions of the state’s infrastructure were mediocre. The grades among the different infrastructure sectors are as follows: aviation (B-), bridges (B), coast areas (D+), ports (B-), drinking water (C+), transit (C), energy (C-), roads (C), school facilities (D+), stormwater (D) and wastewater (C) are between mediocre and at risk. Each category was evaluated on the basis of capacity, condition, funding, future need, operation and maintenance, public safety, resilience, and innovation. A “B” grade signified “good”, while “C” signifies “Mediocre” and “D” signifies “Poor”.

Stormwater and wastewater (graded D and C, respectively) are a current focus on infrastructure improvements throughout the state. In rural areas in particular, replacing septic with sewer has been an effective use of CDBG funds.

Florida’s infrastructure needs are also impacted by the damage created by hurricanes Hermine, Matthew, Irma, and Michael over the past five years. Total impacts from these storms are discussed in more detail in NA-10 of this Consolidated Plan and in the state’s CDBG-DR Action Plans. Collectively, hurricanes Hermine, Matthew, Irma, and Michael created \$125 million in unmet infrastructure need and another \$39 million in unmet economic need.

### **How were these needs determined?**

Stakeholder consultation through public hearings and a survey. The stakeholder survey was conducted with 187 respondents representing a range of community development, housing, and service providers in the state of Florida. Among other questions related to housing and community development, respondents were asked “What are the top five greatest unmet community development needs in your service area?” and were provided with a list of common services, facilities, and improvements, as well as the opportunity to submit their own answer.

Additional needs were determined by reviewing the evaluation of the third-party professional organization of the American Society of Civil Engineers, which periodically issues reports that evaluate the condition of important physical infrastructure by state and a stakeholder survey.

Finally, needs related to disaster recovery are well-documented in the state’s various CDBG-DR Action Plans for hurricanes Hermine and Matthew, Hurricane Irma and Hurricane Michael.

### **Describe the jurisdiction’s need for Public Services:**

Seventy percent of stakeholder survey respondents identified lack or/limited capacity of nonprofits to provide needed public/supportive services as a top need and roughly one in four (27%) identified this unmet need as the most urgent need. This was the most common response among all options for unmet community development needs in Florida.

Respondent also identified both job opportunities and job training/skill development as top unmet needs (66% and 63% of respondents). However, the need for job opportunities was more commonly identified as the number one most urgent unmet need (19%) compared to job training/skill development (6%). Other types of services including microenterprise business assistance (formation,

bookkeeping, etc.), capacity building and technical assistance, and lack of administrative capacity of water and sewer districts to meet CDBG program regulations were less commonly identified as top unmet needs (11%, 9% and 8% respectively).

### **How were these needs determined?**

The needs were determined through stakeholder consultation, public hearings and a survey. The stakeholder survey was conducted with 187 respondents representing a range of community development, housing and service providers in the state of Florida. Among other questions related to housing and community development, respondents were asked “What are the top five greatest unmet community development needs in your service area?” and were provided with a list of common services, facilities and improvements, as well as the opportunity to submit their own answer.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

This section describes significant characteristics of the housing market in Florida, including a review of supply and demand, as well as the cost and condition of the housing stock. Finally, the section includes a discussion of high priority needs.

According to the National Low Income Housing Coalition 2020 Florida Housing Profile, based on 2018 ACS data, there is a deficit of over 400,000 rental units for extremely low-income households with only 26 affordable and available rental units per 100 households at or below extremely low-income.

The Shimberg Center for Housing Studies' 2019 Rental Market Study also identifies a shortage of affordable for households earning up to 60 percent of AMI and a shortage of affordable *available* units for households earning between 60 and 80 percent AMI.

Statewide, the median home value rose by 40 percent between 2010 and 2018 from \$164,000 to \$230,000. Median rent increased from \$800 per month in 2010 to over \$1,000 per month in 2018, an increase of 29 percent. Median income, however, failed to grow as rapidly as median rent or median home values rising 25 percent over the same period (from about \$44,000 in 2010 to about \$55,000 in 2018). This signifies that at the median, households experienced increasing relative cost of housing. Analysis by income level reveal that the increased relative cost of housing was not distributed evenly among all income groups and that the lowest income residents were spending the greatest proportion of their income on housing.

According to the statewide stakeholder survey, the following housing activities were identified as most urgent housing needs in the state. The percentage signifies the proportion of respondents who placed the activity in the top three most urgent needs:

- Rental units for extremely low income/poverty-level households (at 30% Area Median Income or AMI) (46%)
- Rental housing for very low-income households (60% AMI or less) (42%);
- Long-term tenant based rental assistance (40%);
- Homes for low- to moderate-income households to buy (60%-120% AMI) (35%);
- Rental housing for low to moderate-income households (80% AMI or less) (33%);
- Repurpose of vacant/underutilized properties into affordable housing (28%);
- Transitional housing for people moving out of homelessness (27%);
- Short-term tenant based rental assistance (25%);
- Long-term supportive services (23%);
- Emergency assistance to pay utilities (22%); and
- Housing for area workforce (19%).

## MA-10 Number of Housing Units – 91.310(a)

### Introduction

This section provides an overview of the housing supply in Florida including data from HUD, and the 2018 American Community Survey (ACS). The most common housing units in Florida in 2018 were single-family, detached units, which comprised of 58 percent of all units. Small attached, or “missing middle” housing types comprised another 22 percent of units, followed by larger multifamily structures (those in buildings with 20 or more units), accounting for 12 percent of all housing units. Mobile home units, which comprise the majority of the “mobile homes, boats, RVs, vans, etc.” category represented 8 percent.

The vast majority (72%) of owner-occupied units were three bedrooms or larger. Only 3 percent of owner-occupied units were one bedroom or less. Renter occupied units, on the other hand, were more diverse in size with one-bedroom units representing 22 percent, two-bedroom units representing 41 percent, and three or more bedroom units representing 33 percent of all renter occupied units.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	4,528,690	57.99%
1-unit, attached structure	509,296	6.52%
2-4 units	451,545	5.78%
5-19 units	787,174	10.08%
20 or more units	919,693	11.78%
Mobile Home, boat, RV, van, etc.	612,960	7.85%
<i>Total</i>	7,809,358	100.00%

**Table 30 – Residential Properties by Unit Number**

Data Source: 2018 ACS, 1 year estimates

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	27,418	0.53%	116,606	4.38%
1 bedroom	153,890	2.99%	583,689	21.93%
2 bedrooms	1,262,917	24.53%	1,090,629	40.98%
3 or more bedrooms	3,704,017	71.95%	870,192	32.70%
<i>Total</i>	5,148,242	100.00%	2,661,116	100.00%

**Table 31 – Unit Size by Tenure**

Data Source: 2018 ACS, 1 year estimates

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

According to the Shimberg Center for Housing Studies' Florida Housing Database Clearinghouse Assisted Housing Inventory (AHI) last updated in April 2020, there were roughly 285,000 units of assisted housing units throughout the state that represent 11 percent of the total rental housing units. This inventory included units with federal, state and local funding.

Among the total assisted units, 83 percent were targeted to families and 30 percent were targeted to the elderly. Also 14 percent of assisted units were targeted through the LINK initiative which refers to units funded by Florida Housing and set aside for extremely low-income households with special needs (homeless, domestic violence survivors, persons with a disability, youth aging out of foster care). Only 1 percent of units were targets to individuals experiencing homelessness and 2 percent were targeted to persons with disabilities. These categories are not mutually exclusive and assisted unit targets may target multiple categories.

### **Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

The 2019 Rental Market study includes an analysis of publicly assisted units that are expected to be lost from the affordable inventory both due to subsidy expirations and due to physical deterioration (aging developments).

- According to the study, 268 developments statewide (27,659 units) have overall subsidy expiration dates by the end of 2030. These include 88 properties (15,735 units) funded by Florida Housing, 41 properties (1,758 units) funded by USDA Rural Development and 163 HUD-funded properties (13,125 units).
- There are 743 publicly assisted properties (67,759 units) in Florida's affordable inventory that are 30 years old or older. These units have the highest preservation risk related to physical deterioration.

### **Does the availability of housing units meet the needs of the population?**

The availability of housing units does not meet the need of Florida residents. For low- and moderate-income households in Florida, there is a considerable lack of affordable rental units. According to the 2019 Rental Market study, the number of cost burdened renters increased by nearly half a million households between 2000 and 2019 with renters with incomes at or below 60 percent of AMI made up most of the growth (350,893 households). The study also reveals that at the 0-30 percent through 0-60 percent of AMI levels, there are more renter households than affordable units based on 2017 estimates. At the 0-60 percent AMI level, there are roughly 297,000 more renter households than there are affordable units. At this income level nearly one in three (32%) of affordable units are occupied by households above the income threshold). However, at the 0-80 percent of AMI levels, there are more affordable units than renter households, but still a shortage of affordable and available units, since many affordable units are rented by households with higher incomes.

## **Describe the need for specific types of housing:**

As noted above, there is a shortage of affordable housing for households earning less than 60 percent AMI and shortage of affordable and available housing for households earning 60 to 80 percent AMI.

Stakeholders also affirmed the need for additional affordable housing at these price points through their responses to a survey question identifying the most urgent housing needs in Florida (percentages denote the proportion of respondents selected the specified need):

- Rental units for extremely low income/poverty-level households (at 30% Area Median Income or AMI) (46%);
- Rental housing for very low-income households (60% AMI or less) (42%);
- Long-term tenant based rental assistance (40%);
- Homes for low- to moderate-income households to buy (60%-120% AMI) (35%);
- Rental housing for low to moderate-income households (80% AMI or less) (33%);
- Repurpose of vacant/underutilized properties into affordable housing (28%);
- Transitional housing for people moving out of homelessness (27%); and
- Housing for area workforce (19%).

Stakeholders also identified populations with disproportionately high housing needs relative to all low- and moderate-income populations overall. The populations most commonly identified by respondents include single parents (48%), people suffering from mental illness (43%), adults with criminal histories (felony convictions) (41%), seniors (40%), people of color (38%), people suffering from substance use disorders (35%), persons with physical disabilities (34%), persons with cognitive disabilities (30%), large families (5+ members) (29%), and households who have experienced domestic violence (28%).

## **Discussion**

Significant hurricanes in 2016, 2017 and 2018 (discussed in more detail in NA-10 and in the state's CDBG-DR Action Plans) exacerbated existing housing needs in impacted areas. Collectively, hurricanes Hermine, Matthew, Irma and Michael created \$346 million in unmet housing need (HUD calculates "unmet housing needs" as the number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA).

## MA-15 Cost of Housing – 91.310(a)

### Introduction

Data available from HUD and the U.S. Census show that housing costs have increased significantly for both owners and renters since 2010. Between 2010 and 2018, both median home value and median contract rent increased by 40 percent. The median home value in 2018 was over \$230,000, nearly \$66,000 greater than in 2010. Median contract rent rose from just under \$800 per month to over \$1,000 per month. Over the same period however, median income only rose by 25 percent indicating a loss of relative affordability.

Two in three renter households (nearly 1.68 million renter households) pay more than \$1,000 per month in rent and very few pay less than \$500 per month (5%). In 2000, there were under 800,000 renter units paying over \$1,000 a month in inflation adjusted dollars, less than half the total number in 2018.

### Cost of Housing

	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	\$164,200	\$230,600	40%
Median Contract Rent	\$799	\$1,034	29%

**Table 32 – Cost of Housing**

Data Source: 2010 ACS, 1 year estimates (Base Year), 2018 ACS, 1 year estimates (Most Recent Year)

Rent Paid	Number	%
Less than \$500	139,043	5.44%
\$500-999	737,642	28.88%
\$1,000-1,499	995,156	38.96%
\$1,500-1,999	462,986	18.13%
\$2,000 or more	219,333	8.59%
<b>Total</b>	<b>2,554,160</b>	<b>100%</b>

**Table 33 - Rent Paid**

Data Source: 2018 ACS, 1 year estimates

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	120,530	No Data
50% HAMFI	365,990	485,895
80% HAMFI	1,362,570	1,235,365
100% HAMFI	No Data	1,778,360
<b>Total</b>	<b>1,849,090</b>	<b>3,499,620</b>

**Table 25 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	<i>not applicable to states</i>				
High HOME Rent	<i>not applicable to states</i>				
Low HOME Rent	<i>not applicable to states</i>				

**Table 26 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

No, there is not sufficient housing for all households at all income levels. For households at or below 30 percent AMI, there is an affordability shortage of over 400,000 units. Additional shortages of affordable available units persist for incomes up to 80 percent of AMI.

Stakeholders also identified unmet housing needs for transitional housing for people experiencing and at risk of homelessness, supportive services for special needs populations, and emergency assistance (housing repairs and utilities).

### How is affordability of housing likely to change considering changes to home values and/or rents?

As noted previously, housing prices—in both the rental and ownership markets—are rising faster than incomes, widening the affordability gap. If trends continue, affordability will continue to decline, particularly for wage and service workers whose incomes remain relatively flat.

As of the writing of this report, the impact of the COVID-19 pandemic beginning in early 2020 will also likely have a large impact on the housing market both from an economic standpoint and a preference standpoint. However, the full impacts remain unknown.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Fair Market Rents (FMR) are not calculated at the state level, instead HUD FMR's are estimates of rental housing costs in local housing markets.

## Discussion

As discussed previously, significant hurricanes in 2016, 2017 and 2018 (discussed in more detail in NA-10 and in the state's CDBG-DR Action Plans) exacerbated existing housing needs in impacted areas. Such disasters not only have an acute impact on housing units damaged by the storms, but they can also have longer term impacts on the cost of housing. Collectively, hurricanes Hermine, Matthew, Irma and Michael created \$346 million in unmet housing need (HUD calculates "unmet housing needs" as the

number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA).

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## MA-20 Condition of Housing – 91.310(a)

### Introduction:

This section summarizes condition indicators that are available from the U.S. Census and from HUD. The data are supplemented by stakeholder consultation on housing condition gathered through the stakeholder survey and public hearings.

### Definitions

- **Standard Condition:** A dwelling unit that meets HUD Section 8 Housing Quality Standards (HQS) with no major defects in the structure and only minor maintenance is required. Such a dwelling will have the following characteristics: reliable roofs, sound foundations, adequate and stable floors, walls, and ceilings, surfaces and woodwork that are not seriously damaged nor have paint deterioration, sound windows and doors, adequate heating, plumbing and electrical systems, adequate insulation and adequate water and sewer systems and are not overcrowded as defined by local code.
- **Substandard condition:** A dwelling unit is a unit that does not meet HUD Section 8 HQS, which includes lacking the following: complete plumbing, complete kitchen facilities, efficient and environmentally sound sewage removal and water supply, and a heating source. Additionally, the dwelling may be overcrowded as defined by local code.
- **Substandard but suitable for rehabilitation:** A dwelling unit, at a minimum, does not meet Section 8 HQS with some of the same features as a “substandard condition” dwelling unit. This unit is likely to have deferred maintenance and may have some structural damage such as a leaking roof, deteriorated interior surfaces, and inadequate insulation. A “substandard but suitable” dwelling unit, however, has basic infrastructure (including systems for clean water and adequate waste disposal) that allows for economically and physically feasible improvements and upon completion of rehabilitation meets the definition of a “standard” dwelling unit.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,298,659	25.23%	1,342,888	50.46%
With two selected Conditions	25,743	0.50%	100,131	3.76%
With three selected Conditions	1,781	0.03%	5,284	0.20%
With four selected Conditions	58	0.00%	0	0.00%
No selected Conditions	3,822,001	74.24%	1,212,813	45.58%
<i>Total</i>	5,148,242	100.00%	2,661,116	100.00%

**Table 36 - Condition of Units**

Data Source: 2018 ACS, 1 year estimates

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,416,532	27.51%	618,119	23.23%
1980-1999	1,926,519	37.42%	946,467	35.57%
1950-1979	1,621,526	31.50%	959,723	36.06%
Before 1950	183,665	3.57%	136,807	5.14%
<i>Total</i>	5,148,242	100.00%	2,661,116	100.00%

**Table 37 – Year Unit Built**

Data Source: 2018 ACS, 1 year estimates

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,805,191	35%	1,096,530	41%
Housing Units built before 1980 with children present	614,710	13%	328,115	13%

**Table 38 – Risk of Lead-Based Paint**

Data Source: 2018 ACS, 1 year estimates (Total Units) 2011-2015 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			1,738,404
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

**Table 39 - Vacant Units**

Data Source: 2014-2018 ACS, 1 year estimates

## Need for Owner and Rental Rehabilitation

Table 36 shows that a quarter (25%) of owner-occupied units and half (50%) of renter occupied units had at least one housing condition as specified by HUD. These four selected conditions include: lacking complete kitchen facilities, lacking complete plumbing facilities, overcrowded home and lacking telephone service. This data suggests that the need for rehabilitation is much greater among renter-occupied units than owner-occupied units. Data regarding the age of property in Table 37 reveal that for both renter- and owner-occupied units, over half the units were built before 1980 indicating the likely need for some rehab or repair.

Respondents to the stakeholder survey consistently identified maintenance and upkeep of existing affordable housing stock as a serious housing issue. Respondents also acknowledged that landlords may retaliate against renters who complain about conditions that may result in the eviction of those individuals or families and their neighbors.

Rehabilitation needs also stem from significant hurricanes in 2016, 2017 and 2018 (discussed in more detail in NA-10 and in the state's CDBG-DR Action Plans). Collectively, hurricanes Hermine, Matthew, Irma, and Michael created \$346 million in unmet housing need (HUD calculates "unmet housing needs" as the number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA).

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

According to HUD Table 38 there are over 1.8 million owner-occupied units built before 1980 (35% of all owner-occupied units) and nearly 1.1 million renter-occupied units built before 1980 (41% of all renter-occupied units) in Florida. The fact that these units were built before 1980 increases their risk of containing the health hazard of lead-based paint.

Among owner households, 23 percent or roughly 1.1 million units contain related children under the age of 18. If it is assumed that these households are evenly distributed among units based on their age, there would be over 400,000 families with children living in owner-occupied units built before 1980 and roughly 350,000 families with children living in rental units in structures built before 1980. Families who are low income or otherwise unable to afford hazard mitigation and had young children were likely the most at risk for lead related health hazards.

### **Discussion:**

There is considerable need for housing rehabilitation in Florida due to old age or specific housing conditions as specified by HUD. Statewide nearly 2.8 million units had at least one housing condition, over a third of all housing units (36%). Over a quarter (26%) of owner-occupied units and roughly half (54%) of renter occupied units had at least one housing condition as specified by HUD. There are over 1.8 million owner-occupied units and nearly 1.1 million renter-occupied units in Florida that were built before 1980 making these units at increased risk of containing the health hazard of lead-based paint and in need of potential rehabilitation and/or remediation.

Rehabilitation related to hurricanes Hermine, Matthew, Irma and Michael are also significant. As noted above, those storms collectively created \$346 million in unmet housing need.

## MA-25 Public and Assisted Housing – (Optional)

### Introduction:

According to the Shimberg Center for Housing Studies’ Affordable Housing Data Clearinghouse, there are 2,681 publicly assisted developments that provided 285,010 affordable housing units statewide through a variety of funding sources including the Florida Housing Finance Corporation, local housing finance authorities, the United States Department of Agricultural Rural Development, the HUD Multifamily program and HUD Public Housing.

Neither the Small Cities CDBG, HOPWA, nor ESG, provide funding to PHAs in Florida. Even so, data are provided in this optional section to offer additional context to the housing needs discussed in the Consolidated Plan. Data are based on HUD’s Picture of Subsidized Households for the state of Florida and Shimberg Center for Housing Studies’ Affordable Housing Data Clearinghouse.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available		2,493	29,892	153,694	42,473	111,221			
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 27 – Total Number of Units by Program Type**

Data HUD Picture of Subsidized Households: 2018

Source:

### Describe the supply of public housing developments:

The projects included in the Florida Housing Inventory that include “Public Housing” as a program type represent 32,210 assisted units. Of these units, 23 percent (7,879 units) were built in the year 2000 or after, 15 percent were built between 1980 and 2000 (5,211 units) and 62 percent were built before 1980 (21,066 units).

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 743 publicly assisted properties (67,759 units) in Florida’s affordable housing inventory that are 30 years old or older. These units have the highest preservation risk related to physical deterioration. Most of these units—75 percent—are either HUD Multifamily or Public Housing Units. The remainder are USDA RD, Florida Housing or LHFA funded.

**Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:**

As noted above, there are 743 publicly assisted housing developments in Florida's affordable inventory that are 30 years old or older; 75 percent of which are HUD Multifamily or Public Housing Units. These units are the most likely to need restoration and revitalization.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

Public housing agencies throughout the state provide programs and tools necessary for families residing in public housing to achieve self-sufficiency and become more financially independent. Some programs provide adults with job training and financial planning strategies that promote self-sufficiency and set goals to leave public housing and eventually buy a home in the general housing market.

**Discussion:**

Please see above.

## MA-30 Homeless Facilities – 91.310(b)

### Introduction

This section discusses Florida’s homeless facilities relative to the needs of people and families experiencing homelessness.

### Facilities Targeted to Homeless Persons

	Emergency Shelter		Transitional Housing	Permanent Supportive Housing Beds	
	Year Round Beds	Voucher/Seasonal/ Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	4,822	n/a	2,445	2,263	0
Households with Only Adults	6,430	n/a	4,289	12,380	0
Chronically Homeless Households	n/a	n/a	0	10,498	0
Unaccompanied Youth	507	n/a	400	172	0
Veteran	264	n/a	914	7,952	0

**Table 41 – Facilities Targeted to Homeless Persons**

Data Source: HUD 2019 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report

### **Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Low or no cost health and social services available to the public are provided through a number of Florida agencies including healthcare through the DOH, mental health treatment and counseling through the DCF’s Substance Abuse and Mental Health (SAMH) program, and foster care for youth through the DCF and the Florida State Foster/Adoptive Parent Association (FSFAPA). Additionally, job development/job training-placement programs are provided through the Department of Economic Opportunity’s Workforce Centers located throughout the state. The agencies in the state with HUD-funded programs also fund projects to assist the homeless, support economic development projects requiring employment for low- to moderate-income workers (including a requirement for job training for these jobs when needed), as well as transitional housing and supportive services providing specialized programs for homeless persons experiencing mental health and substance abuse problems.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

HUD's Housing Inventory Count (HIC) report indicates there are a total of 18,617 emergency, safe haven and transitional housing beds available year-round in the state of Florida. There are another 26,7014 Permanent Supportive Housing (PSH) beds serving people experiencing homelessness (permanent supportive housing, rapid rehousing, and other permanent housing). Among the total bed inventory, 18,773 beds (5,871 units) are dedicated to families with children, 10,498 beds are dedicated to serving chronically homeless individuals, 10,339 are dedicated to veterans and 1,317 are dedicated to unaccompanied youth.

According to the 2019 Rental Market Study, the number of transitional and PSH beds and units is insufficient to meet the current need, though the supply relative to need has improved since 2013. For homeless individuals, a comparison of PSH beds to individuals experiencing homelessness reveals that Florida has 52 PSH beds for every 100 homeless individuals—about half of what it needs. However, this reflects improvement from 2016 when there were 32 beds per 100 individuals and from 2013 when there were 19 beds for every homeless individual. These improvements reflect both an increase in beds but also a decline in the number of homeless individuals.

The shortage of PSH units is more severe for families with children experiencing homelessness. Statewide there are only seven PSH units for every 100 homeless families. Although the number of PSH units for families has increased over the past seven years, the number of families experiencing homelessness has also increased so the ratio of beds to needs has stayed fairly constant.

## MA-35 Special Needs Facilities and Services – 91.310(c)

### Introduction

This section summarizes the facilities and services available to meet the needs of certain special needs residents. Non-homeless special needs populations are described in detail in NA-45.

### HOPWA Assistance Baseline Table

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	112
PH in facilities	0
STRMU	2,944
ST or TH facilities	107
PH placement	420

**Table 42 – HOPWA Assistance Baseline**

**Data Source:** HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

### **To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Individuals and families with disabilities (i.e., mental, physical, developmental), persons with alcohol or other drug addictions, and persons with HIV/AIDS and their families receive supportive housing assistance that include on-site case management and referral and follow-up condition specific services, independent living skills, and activities that engage the participants in the community and prevent isolation, and transportation assistance to facilitate supportive service appointments. For the elderly, the services described are needed in addition to a higher degree of supervised independent living support, the provision of one or more meals per day, and safety devices such as grab bars in showers and tubs, along with electronic life safety intercoms to call for help.

The Agency for Persons with Disabilities (APD) reports that for the first time in eight years, APD offered waiver enrollment to nearly 1,600 people on the APD waiting list to receive needed services in their communities.

APD currently serves 30,057 individuals with developmental disabilities through the iBudget Florida waiver program. iBudget stands for individualized budget because each person’s budget is based on their health and safety needs. Once an individual’s budget is established, they can allocate the funding to the services they want and need. The Home and Community Based Services (HCBS) Medicaid waiver offers a variety of services to help individuals with autism, cerebral palsy, spina bifida, intellectual disabilities, Down syndrome, or Prader-Willi syndrome live in their communities.

iBudget Florida provides to APD customers 27 services that fall under seven categories. The support activities and services are: Life Skills Development, Supplies and Equipment, Personal Support, Residential Services, Support Coordination, Therapeutic Support and Wellness, Transportation and Dental Services.

APD currently has 21,191 individuals on the waiver waiting list. APD may provide one-time services to people on the waiting list or assist people with an emergency. The agency enrolls individuals into the waiver who meet the crisis criteria that include homeless, a danger to self or others or a caregiver unable to provide care. Approximately 450 people are enrolled in the waiver each year.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

In the state of Florida, certain transitional housing programs are specifically for persons with mental health disorders and provide mental health counseling and treatment as well as focused case-by-case support. Many of the state's permanent housing programs are specifically directed to persons with mental health and/or physical health disabilities in order to provide services and other assistance for these special needs persons and their families. Florida Department of Children and Families Mental Health Program Office is responsible for planning, managing and evaluating a statewide program of mental health services and support, including community programs, crisis services, state residential treatment facilities and children's mental health services. The public mental health system is funded by federal block grant dollars and the Florida Legislature.

Though the state directly operates some of its mental health treatment facilities, Florida's community mental health system is completely privatized. Public funds are contracted through local Mental Health Program Offices, mostly with non-profit local Community Mental Health Centers. People who need services get them by going to those providers directly - the state mental health program offices do not provide services.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The state of Florida will continue many of the projects discussed in the previous Consolidated Plan. These activities will include housing development across all federal and state programs, providing assistance to senior citizens, HIV/AIDS prevention, services for individuals with disabilities, providing shelters for victims of domestic violence, and services for children.

The state will continue, as long as funding permits, to administer the Permanent Supportive Housing Notice of Funding Availability (NOFA) processes to provide gap financing for the creation and/or preservation of affordable housing for those with special needs. Florida will also continue to use HTF dollars to create affordable housing for extremely low-income households, including people at risk of homelessness and those with special needs.

The state of Florida will continue to administer the HOPWA grant. HOPWA formula funds are used to contract with other government agencies and non-profit organizations to provide rental assistance, housing supportive services, technical assistance, and many other services for low-income persons living with HIV/AIDS who are experiencing homelessness or at risk of homelessness. Transitional/Short-Term or Emergency Housing programs are expected to work individually with people living with HIV/AIDS in helping stabilize them and their transition to affordable permanent housing. Stabilization can include services related to a client's physical, mental and emotional needs. The HOPWA program also funds Tenant-Based Rental Assistance (TBRA) activities to provide affordable rental housing opportunities for persons with HIV/AIDS.

## **MA-40 Barriers to Affordable Housing – 91.310(d)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

As part of the stakeholder survey conducted for the Consolidated Plan, Florida stakeholders were asked to identify fair housing barriers, including those related to state and local policies. In general, local regulations and policies were considered to be bigger barriers to affordable and fair housing than state regulations.

The top regulatory barrier identified by stakeholders was “Overly restrictive local land use and zoning regulations that limit development of affordable housing”. Respondents also generally agreed that lack of zoning for density (both modest density and multifamily developments) also presented a serious barrier to affordable housing.

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.

## MA-45 Non-Housing Community Development Assets -91.315(f)

### Introduction

This section summarizes economic development and employment indicators and needs in Florida. In 2018, there were more than 10.3 million Florida residents in the civilian labor force and nearly 9.4 million were employed (unemployment rate of 5.2 percent).

Unemployment within the civilian labor force is higher among those with less than a high school education (12%). Unemployment rates decrease as educational attainment increases with the lowest unemployment rate (3%) among residents in the civilian labor force that have a bachelor's degree or higher.

The most jobs of any sector were in the Education and Health Care Services sector, which represented 21 percent of jobs (nearly 1.8 million jobs). The Education and Health Services sector also represented the greatest proportion and number of workers nearly (21% or 2 million workers).

### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	92,625	83,231	1.0%	1.0%	0.0%
Arts, Entertainment, Accommodations	1,178,037	1,250,661	12.4%	14.8%	2.4%
Construction	727,365	510,810	7.7%	6.0%	-1.6%
Education and Health Care Services	1,987,542	1,809,354	20.9%	21.4%	0.5%
Finance, Insurance, and Real Estate	729,591	556,709	7.7%	6.6%	-1.1%
Information	165,355	138,911	1.7%	1.6%	-0.1%
Manufacturing	475,908	361,152	5.0%	4.3%	-0.7%
Other Services	508,999	276,805	5.4%	3.3%	-2.1%
Professional, Scientific, Management Services	1,242,171	1,340,566	13.1%	15.9%	2.8%
Public Administration	390,493	380,463	4.1%	4.5%	0.4%
Retail Trade	1,216,508	1,099,137	12.8%	13.0%	0.2%
Transportation and Warehousing	529,541	299,505	5.6%	3.5%	-2.0%
Wholesale Trade	244,607	345,100	2.6%	4.1%	1.5%
Total	9,488,742	8,452,404			

**Table 43- Business Activity**

Data Source: 2017 1yr ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	10,308,765
Civilian Employed Population 16 years and over	9,395,552
Unemployment Rate	5.20%
Unemployment Rate for Ages 16-24	23.60%
Unemployment Rate for Ages 25-65	5.50%

**Table 44 - Labor Force**

Data Source: 2018 1yr ACS

## Occupations by Sector – Employed population Over 16

Occupations by Sector	Number of People
Management, business and financial	3,445,087
Farming, fisheries, and forestry occupations	58,058
Service	1,946,957
Sales and office	2,371,528
Construction, extraction, maintenance, and repair	871,900
Production, transportation, and material moving	1,041,410

**Table 45 – Occupations by Sector**

Data Source: 2018 1yr ACS

## Travel Time – Workers Over 16 who did Not Work from Home

Travel Time	Number	Percentage
< 30 Minutes	5,086,072	56.44%
30-59 Minutes	3,145,421	34.90%
60 or More Minutes	780,498	8.66%
<i>Total</i>	9,011,991	100.00%

**Table 46 - Travel Time**

Data Source: 2018 ACS, 1 year estimates

**Education:**

**Educational Attainment by Employment Status (Population 25 and 64)**

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	616,800	80,948	442,363
High school graduate (includes equivalency)	2,059,091	156,503	853,096
Some college or Associate's degree	2,482,156	150,942	721,167
Bachelor's degree or higher	2,731,262	91,267	557,745

**Table 47 - Educational Attainment by Employment Status**

Data Source: 2018 ACS, 1 year estimates

**Educational Attainment by Age**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	29,374	84,431	104,182	223,623	296,636
9th to 12th grade, no diploma	239,492	173,595	177,709	376,571	324,985
High school graduate, GED, or alternative	569,001	750,289	682,184	1,636,217	1,319,264
Some college, no degree	593,027	578,278	482,355	1,116,290	838,776
Associate's degree	169,771	312,205	276,326	588,811	312,168
Bachelor's degree	155,327	608,897	548,332	1,053,322	709,908
Graduate or professional degree	13,333	250,820	315,616	603,288	557,047

**Table 48 - Educational Attainment by Age**

Data Source: 2018 ACS, 1 year estimates

**Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,097
High school graduate (includes equivalency)	27,900
Some college or Associate's degree	33,334
Bachelor's degree	46,380
Graduate or professional degree	61,748

**Table 49 – Median Earnings in the Past 12 Months**

Data Source: 2018 ACS, 1 year estimates

**Based on the Business Activity table above, what are the major employment sectors within the state?**

The top four employment sectors in Florida, each with over 10 percent of the total jobs in the state, include Education and Health Care Services (21%); Professional, Scientific and Management Services (16%), Arts, Entertainment and Accommodations (15%), and Retail Trade (13%). The sectors represent nearly two out of every three jobs (65%) or nearly 5.5 million jobs. In 2017, the educational service workers had annual earnings of over \$44,000 and healthcare or social assistance workers had average annual incomes of over \$51,000. Among top job sectors, the highest incomes were for management of companies and enterprises (over \$100,000 average annual salary) and professional, scientific and technical services (over \$74,000 average annual salary). Other top industries including arts, entertainment and recreation; accommodation and food services and retail each had low average annual incomes (\$36,216; \$25,584; and \$32,508 respectively).

**Describe the workforce and infrastructure needs of business in the state.**

The workforce needs of Florida vary by region and industry. Overall, the state’s economy has historically been driven by leisure and hospitality but continues to diversify with strong gains in both the construction and professional and business services sectors (Strategic Plan for Economic Development 2018-2023). Emerging industries in the state, such as life sciences, sustainable agriculture, simulation, and aerospace position the state to continue to expand opportunities.

As discussed in the State’s Economic Development Strategic Plan, it is important for the state to maintain the workforce for traditional industries such as tourism, agriculture and construction while expanding the workforce in growing sectors (projections indicate that by 2025 64% of Florida jobs would require a postsecondary degree or certificate). This is likely to occur both through education and development of the existing workforce, but also by improving net migration of the required workforce demographic. Indeed, one of the pillars of the state’s economic development strategy is “Talent Supply and Education—leading the world in talent development, attraction, and retention.”

Another pillar of the strategy focuses on addressing infrastructure needs of businesses in the state: “Infrastructure Growth and Leadership: Enhancing Florida’s infrastructure and positioning for growth and opportunities.” The Plan highlights a need to develop and maintain safe and modern multimodal, interconnected transportations systems including seaports, airports, spaceports, railways, major truck corridors, and integrated logistics and distribution centers. Affordable housing is also seen as an essential infrastructure and ensuring availability of workforce housing that has the necessary future supply of quality water, telecommunications, and energy are stated goals.

Economic Development project applications as part of the CDBG Small Cities program indicate the following workforce and infrastructure needs in non-entitlement areas of the state:

- There is continuing demand for construction of publicly-owned infrastructure including utilities which are prerequisite to facilitate the construction of new or expanded privately-owned business facilities to support the retention and/or creation new employment opportunities.
- Non-entitlement local government partnerships with private sector businesses continues to provide significant employment and training opportunities for members of low- to -moderate-income households that would not otherwise be available.

It is also important to note the economic impact of the COVID-19 pandemic on the state’s workforce and business community. Though the long-term impact is not yet known, the state—like the country overall—has experienced a rise in unemployment and insecurity for business, particularly those in the tourism, service, retail and food/beverage industries.

**Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The ongoing public health and economic crisis resulting from the 2020 COVID-19 pandemic will likely have major impacts on planned public and private sector investments or initiatives, especially related to job and business growth opportunities. According to the stakeholder survey conducted for this Consolidated Plan, many respondents anticipated increased unmet community and economic development needs as a result of the COVID-19 crisis. Common concerns were unemployment resulting in lost wages and inability to pay bills and participate in economic activity more broadly. Respondents also worried that salaries and income would be depressed if and when jobs returned.

Respondents identified a lack of economic diversity as contributing to the negative economic impacts of the crisis, especially for communities who rely predominantly on hospitality and tourism related industries as these industries were among some of the hardest hit by both stay-at-home orders and/or spending related to health safety fears among consumers. Many respondents anticipate these trends affecting both workers and business owners and identified the need to target efforts to help existing small businesses to survive, as well as stimulate new businesses that will help diversify the economy. Job training and placement programs were among the programs identified as key. Respondents identified the elderly as well as minority populations, especially those with extremely low and very low incomes as particularly vulnerable to both the negative economic and health related impacts of the COVID-19 pandemic, and therefore, these groups should be targeted for future investments related to the crisis.

**How do the skills and education of the current workforce correspond to employment opportunities in the state?**

The skills and education of the current workforce are fairly well aligned, though several of the largest job and employment sectors have proportional mismatches among number of jobs and number of workers.

Arts, Entertainment and Accommodation as well as Professional, Scientific and Management Services both have proportions of jobs in the sector that are over 2 percentage points greater than the proportion of workers in the sector. The Professional, Scientific and Management sectors typically require higher levels of educational attainment. With income levels positively correlated with educational attainment, increasing the number of workers qualified to work jobs that require higher educational attainment and providing higher pay will increase overall prosperity.

The high proportion of older adults and those exiting the workforce for retirement means that less than 40 percent of the total state population will be in the workforce, increasing the need for workforce-based programs that address mismatches in the labor market.

Quick Response Training grants from CareerSource Florida have assisted roughly 700 Florida businesses to increase productivity and profitability according to the Strategic Plan for Economic Development 2018-2023. Grants provided by the program are used offset the cost of training (up to 75% of total cost) for high skilled jobs in manufacturing, aviation/aerospace, information technology and other targeted industries. Roughly 123,000 Floridians have been trained through the program according to the report.

**Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.**

Current workforce training initiatives supported by the state of Florida include expanding technical education and certification programs to increase the number of workers with industry credentials and strengthening mentoring and training, especially for entrepreneurship. The state also works to maintain its performance among higher education institutions by improving their Secondary Independent Certification Program, the digital tool certifications and attainment of the Higher Education Council "RISE to 55" initiative to increase the percent of workforce having postsecondary certifications or credentials. Programs through the Florida Center for Nurses work to address skills gaps and increasing graduates to address the job vacancies challenges in the Florida healthcare system.

**Describe any other state efforts to support economic growth.**

Florida programs are oriented toward veterans and spouses and children of service-members, helping them find careers in the state that meet their needs. The Department of Economic Opportunity administers the "Jobs for Veterans" state grant as well as the Department of Veterans' Affairs to promote and maximize employment of veterans living in Florida.

Other initiatives include VISIT FLORIDA, which aims at marketing Florida to travelers, visitors, and businesses so to grow tourism and related industries in the state. Florida has more than 100 million visitors annually with 116 million visitors in 2017, which represents a significant contribution to the state's economy.

Among other key industries, Space Florida is partnering with NASA to expand the uses of the Kennedy Space Center on Florida's Space Coast. The aviation and aerospace industry is important to the future of Florida's economy with \$6.2 billion in annual exports, roughly 2,000 businesses and roughly 93,000 employees.

Among the agricultural industry, the Department of Agriculture and Consumer Services' Farm to Fuel initiative has funded six projects through the Research and Development Bioenergy Grant Program in Florida.

Finally, the Florida Main Street program is a technical assistance program of the Department of State that assists in revitalization efforts of traditional historic commercial corridors. The program is statewide and aimed at identifying, evaluating and preserving Florida's historic resources through economic activity and viability.

### **Discussion**

The state of Florida has many community and economic development needs. These needs include infrastructure investments and programs that support economic diversification, job training and business investment, as well as the ongoing health and economic crisis related to the COVID-19 pandemic.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

As discussed in the Needs Assessment section, the most common housing problems—by far—in Florida are cost burden and severe cost burden. According to HUD’s CPD mapping tool, cost burden is highest in southeast Florida (from West Palm Beach through Miami); other high cost burden areas include in and south of Orlando, and in and around Tallahassee.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

Maps of the distribution of residents by race/ethnicity were prepared for the State of Florida Fair Housing Analysis, conducted in conjunction with the Consolidated Plan. These maps identified concentrations of racial/ethnic groups based on the following criteria:

- Census tracts in which the proportion of a protected class is 20 percentage points higher than that in the county overall; and
- Census tracts that are more than 50 percent minority—minority residents defined as those identifying as Hispanic/Latino and/or a non-white race.

According to that analysis, the following concentrations are evident:

- There are 381 Census tracts (9% of all tracts in Florida) with concentrations of Hispanic residents. Of these, seven Census tracts are in non-entitlement areas.
- There are 468 Census tracts (11% of all tracts in Florida) with concentration of African American residents. Of these, 20 Census tracts are completely within non-entitlement areas.
- There are two Census tracts with concentration of Asian residents. Of these, no Census tracts are completely within non-entitlement areas.
- There are 1,489 Census tracts (35% of all tracts in Florida) that have a concentration of 50% or more minority population (any resident that is not non-Hispanic white). Of these, 40 Census tracts are in non-entitlement areas.

### **What are the characteristics of the market in these areas/neighborhoods?**

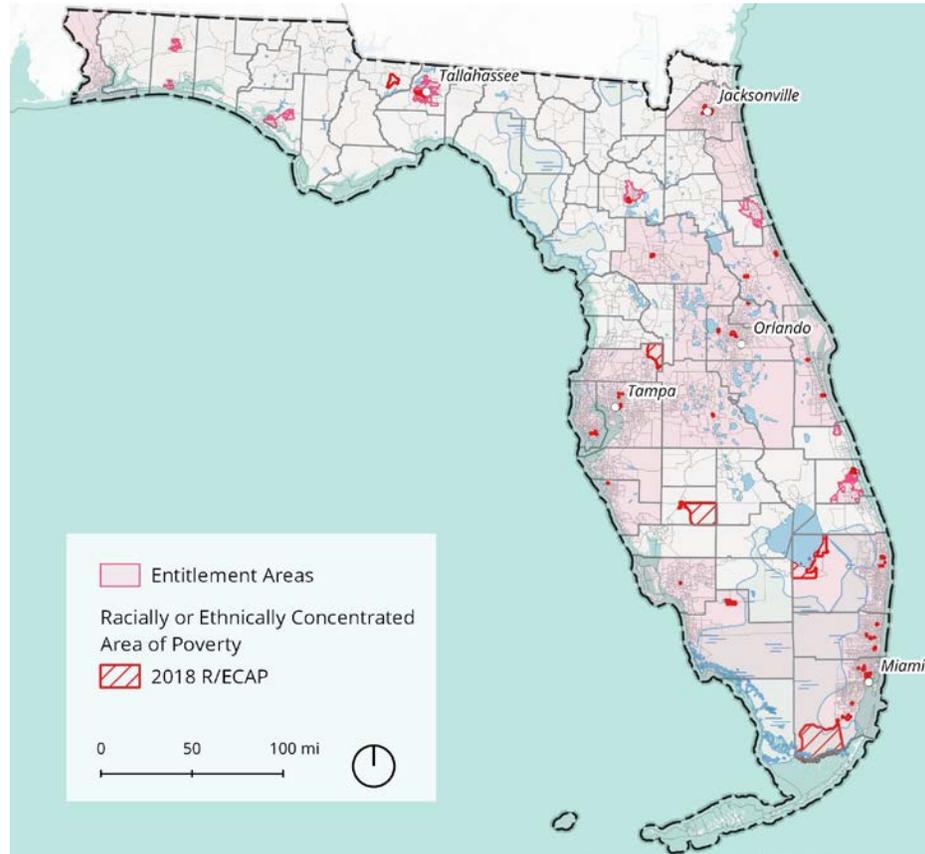
HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history of racial and ethnic segregation, which often limited economic opportunity. “Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods or areas in which there are both racial concentrations and high poverty rates. Specifically, R/ECAPs are defined as Census tracts in which

- 50 percent of the tract population identifies as a racial/ethnic group other than non-Hispanic white; and
- the Census tract poverty rate is 40 percent or higher.

According to this definition, there are 103 R/ECAP qualified Census tracts in Florida, three of which are in CDBG non-Entitlement areas, one in Gadsden County and two in DeSoto County.

**Racially or  
Ethnically  
Concentrated  
Areas of Poverty,  
State of Florida,  
2018**

Source:  
2014-2018 ACS, 5 year  
estimates



**Are there any community assets in these areas/neighborhoods?**

Among the three non-entitlement Census tracts that qualify as R/ECAPs, two are in the inland county of DeSoto County in central Florida. One of these Census tract includes a portion of the city of Arcadia while the other is a large rural Census tract that comprises the full southeast quadrant of the county. While the more urban tract benefits from its adjacency to community services and employment opportunities in the small compact city, the rural tract is partially defined by cultivated citrus farms with a significant amount of undeveloped or cultivated land as well. The third non-entitlement Census tract is in Gadsden County in the state’s panhandle west of Tallahassee. The Census tract is partially rural but also includes a portion of southeastern Quincy, which provides relative proximity to local services and job market.

**Are there other strategic opportunities in any of these areas?**

Yes, although those opportunities will be determined by policies, programs and investment of entitlement jurisdictions.

## **Discussion**

In addition to the items discussed above, the state has unique market needs related to impacts from hurricanes Hermine, Matthew, Irma and Michael. Collectively, these storms created \$515 million in unmet needs across the housing, economic and infrastructure sectors. Specific needs and implementation plans are discussed in detail in the state's CDBG-DR Action Plans.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Statewide, 80 percent of households have a desktop computer and 86 percent have a smartphone. Seventy-two percent of households have broadband access by cable, fiber or DSL while 85 percent have broadband of any kind. Over 1.1 million households (15%) have no internet subscription and over 850,000 households (11%) only have internet through a cellular data plan.

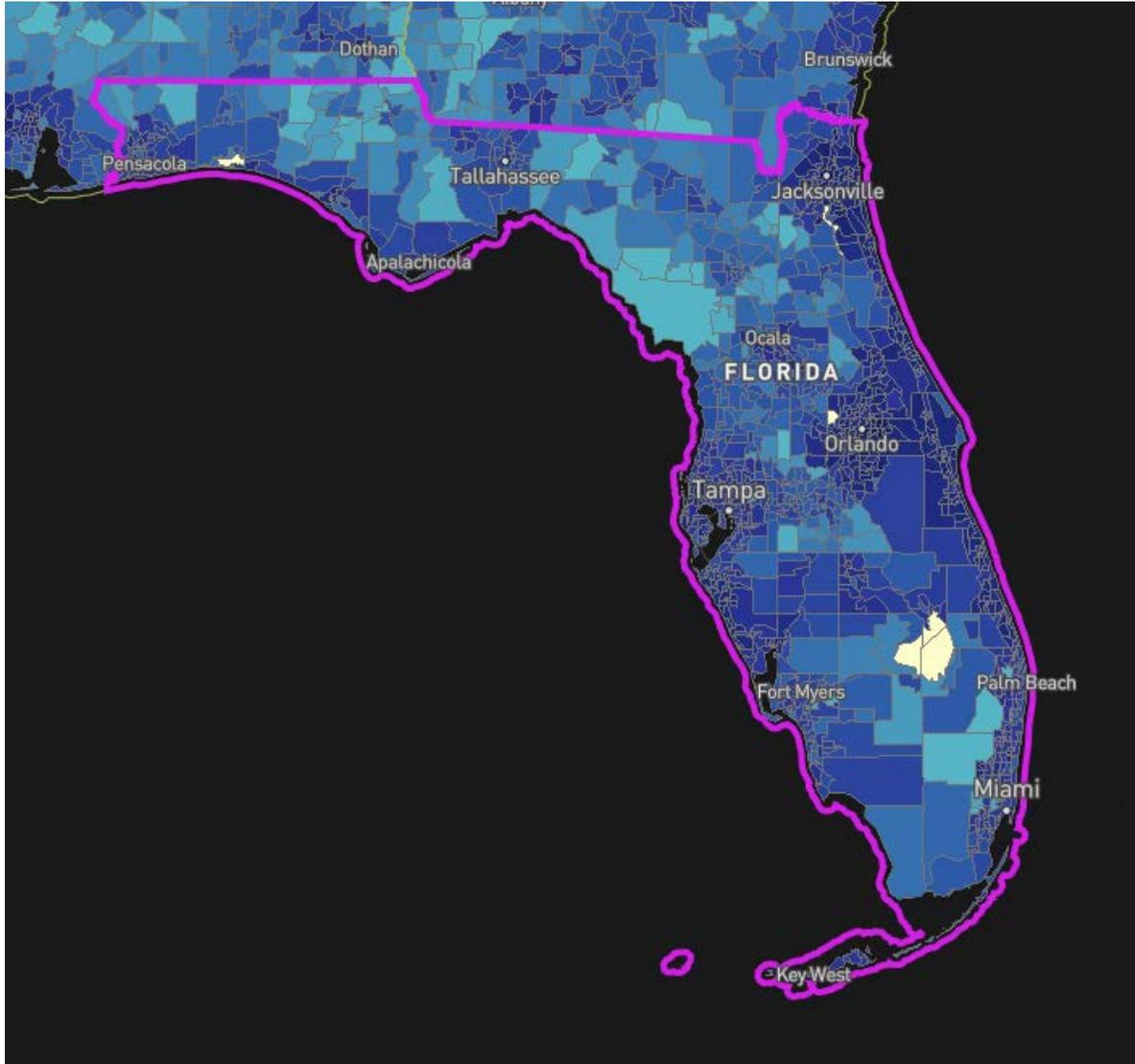
According to the 2020 stakeholder survey of social service providers in Florida, 75 percent responded that there are digital/broadband access barriers in their service area. Respondents identified a range of issues limiting broadband connection among Florida residents, especially low-and moderate-income households. In areas where broadband/high speed internet was available in the community, access was limited because of the cost. This was identified as an issue by 68 percent of survey respondents. More than half (56%) of respondents noted that digital/broadband wiring/connection is not available in parts of their service areas or that residents lacked digital literacy to leverage access that exists (54% of respondents). High cost also was identified as a barrier for computers or other connected devices (46% and 44% respondents respectively).

The Florida DEO Small Cities CDBG Program is partnering with the Florida DEO Office of Broadband to evaluate resources to address broadband needs in CDBG non-entitlement areas. The Office of Broadband is the was created to facilitate the expansion of broadband internet services in the state. The Office of Broadband promotes federal resources to expand broadband throughout the state, including USDA ReConnect Broadband Program and USDA Rural Placement Innovation Challenge, and is evaluating the role of CDBG as a resource for broadband expansion/access that would serve low-to-moderate income households/areas. The state of Florida's Rural Infrastructure Fund, administered by DEO, is another potential resource for increasing broadband access in rural communities throughout the state.

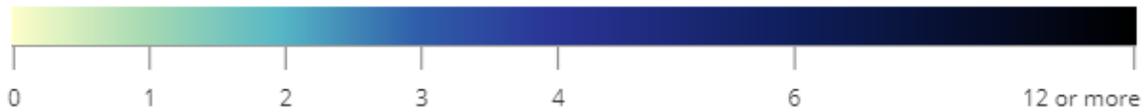
### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

According to the Federal Communications Commission database, the state of Florida has a range of access to competitive broadband markets. Many rural Census tracts have access to only two potential service providers while most urban Census tracts have access to four or more providers. More competition in rural areas could increase quality of access and decrease costs for those residents not living in urban areas. The map below shows the number of fixed residential broadband providers in Florida communities. The cost of broadband/highspeed internet was identified in the stakeholder survey as the top barrier to accessing such services.

# Fixed Residential Broadband Providers



Number of Fixed Residential Broadband Providers



Data Source: Federal Communications Commission, June 2019

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Increased intensity and frequency of hurricanes impacts the housing market through property damage and resident displacement which have effects on housing costs (including costs associated with insurance) and the prevalence of homelessness in Florida. According to the State Council on Homelessness Annual Report in 2019, Florida Department of Education's Homeless Student Counts, in the 2017-2018 school year, almost 20,000 students became homeless by either Hurricane Irma or Hurricane Maria, an increase of 26 percent statewide. The 2019 Florida Rental Market study reveals that following Hurricane Irma, FEMA inspection found moderate to major damage to nearly 40,000 rental units in 49 Florida counties with more than a quarter of those units in Miami-Dade and Monroe counties. Hurricane Michael also had devastating effects on 12 Panhandle counties, with FEMA inspections reporting moderate to major damage to over 11,000 rental units in those counties.

With the recent hurricanes and the population increases, many of the state's key resources are increasingly at risk. The economic fallout of any one of these systems could have significant health and economic impacts on Florida residents and challenge Florida's resiliency.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Though residents throughout Florida are at risk of hurricanes and related flooding, some residents and businesses may experience disproportionate impacts. Residents most vulnerable are those that depend on hourly wage employment as they do not receive wages if they cannot make it to work or their work is closed during or in the wake of a disaster. Small service-oriented businesses are also vulnerable as they are most impacted by potential closures and are less likely than larger corporations to be able to weather a stoppage or shortage in cash flow.

Often times, low-income housing is may be located in areas where land is inexpensive or undesirable, which may include areas within flood plains that will be increasingly at risk.

Challenges related to administration and communication may also have a disproportionate impact on low-income households, who are less likely to have access to the internet. Limited internet access can make it more difficult to receive preparation/education material and access funding or financing needed during recovery.

A presentation by the Shimberg Center for Housing Studies in 2019 titled "Storm Events, Climate Change and At-Risk Affordable Housing: Mapping Vulnerability" identified that 65 percent of FHPC funded units (7,740 units), 50 percent of HUD funded units (3,070 units) and 65 percent of UDSA RD funded units (612 units) were at risk of inundation.

As part of the survey conducted for the Consolidated Plan, stakeholders from service providers in Florida identified resources that communities need most to help low-and-moderate income residents prepare for and recover from natural hazards. Respondents primarily responded to needs related to hurricanes and identified housing durability, distribution of hurricane preparation kits, adequate shelters, communication and administration of planning and infrastructure needs as among the top needs.

DEO's Rebuild Florida Mitigation Programs provide funding to address communities' disaster mitigation needs:

- The Rebuild Florida Critical Facility Hardening Program assists units of general local government and state agencies to harden critical buildings that serve a public safety purpose for local communities.
- The Rebuild Florida General Planning Support Program is designed to provide funding opportunities to units of general local government (UGLG), educational institutions, state agencies and nonprofits for the purpose of developing and updating state, regional and local plans.
- The Rebuild Florida Mitigation General Infrastructure Program is designed to provide funding opportunities for local governments and state agencies to develop large-scale mitigation activities that allow Florida communities to better withstand future disasters.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The purpose of the Strategic Plan section of the Consolidated Plan is to use the information from the data and analysis in the Needs Assessment and Market Analysis sections of the plan to determine how and where the HUD-funded agencies should prioritize the programs they fund to help alleviate deficiencies in community housing and non-housing development categories. This section also discusses the use of leverage funds to maximize the use of HUD funding to increase the number of housing and non-housing projects.

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

- Economic Development;
- Commercial Revitalization;
- Housing Rehabilitation;
- 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 designated specifically to extremely low-income households); and
- Affordable Homeownership Housing.

The goals matrix in SP-45 also accounts for goals that may arise directly related to disaster recovery (CDBG-DR funding) and coronavirus response and recovery (CARES Act funding).

## SP-10 Geographic Priorities – 91.315(a)(1)

### Geographic Area

Table 28 - Geographic Priority Areas

1	Area Name:	STATEWIDE
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The programs administered by the DOH, DCF, FHFC and DEO are applied statewide. The DEO Small Cities CDBG program only applies to non-entitlement municipalities (populations under 50,000) and counties (populations of under 200,000 in the unincorporated areas.). Non-entitlement local governments do not receive funding directly from HUD. Grants are awarded statewide to non-entitlement municipalities and counties through an annual competitive application process. FHFC works with both the public and private sector throughout the state to assist in determining the affordable housing needs that can be served through the HOME and other housing programs.

### General Allocation Priorities

#### Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The Florida Department of Health currently contracts with project sponsors to administer the State HOPWA Program in a designated geographic area, the majority of which are rural. Six areas not included below are eligible metropolitan statistical areas (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 EMSAs administered by the state.

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

- Lutheran Services Florida, Inc., Northwest (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)
- Florida Department of Health-Polk (Highlands, Hardee, and Polk counties)
- Florida Department of Health-St. Lucie (Indian River, Martin, Okeechobee, and St. Lucie counties)

The Florida State HOPWA Program will be doing a Request for Applications (RFA) for the 2021-2022 program year.

## **Non-HOPWA Grantees:**

### **Describe the basis for allocating geographically within the state**

**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. 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 the local communities 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 "homeless" definition in 24 CFR 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR 576.104. Local governments have the freedom to establish further eligibility criteria for program beneficiaries in accordance with 24 CFR 576.400 (e). All local government and nonprofit recipients must consult with the Continuum of Care Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.

**HOME and HTF:** 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 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 Request for Applications (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 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 a competitive 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.

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 29 – Priority Needs Summary  
CDBG Related Priority Needs:

Priority Need	1. Commercial Revitalization	2. Economic Development	3. Housing Rehabilitation	4. Neighborhood Revitalization	5. Coronavirus Response and Recovery
Priority Level	High	High	High	High	High
Population	Extremely Low Low Moderate	Extremely Low Low Moderate	Extremely Low Low Moderate	Extremely Low Low Moderate	Extremely Low Low Moderate
Geographic Areas	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE
Associated Goals	Commercial Revitalization	Economic Development	Housing Rehabilitation	Neighborhood Revitalization	Coronavirus Response and Recovery
Description	Activities 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.	Creation or retention of jobs primarily for persons from low-to-moderate income households.	Improve housing conditions for low- and moderate-income persons.	Preserve and revitalize declining, primarily residential, low- and moderate-income service area neighborhoods by addressing the major infrastructure problems contributing to such decline.	Responding to the housing and community development needs stemming from the COVID-19 pandemic.
Basis for Relative Priority	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.

**ESG Related Priority Needs:**

<b>Priority Need</b>	<b>6. Street Outreach to Homeless Persons</b>	<b>7. Emergency Shelters</b>	<b>8. Homeless Prevention and Rapid Rehousing</b>
<b>Priority Level</b>	High	High	High
<b>Population</b>	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	Extremely Low Income Rural Chronic Homelessness Individuals Families with Children Mentally Ill Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
<b>Geographic Areas</b>	STATEWIDE	STATEWIDE	STATEWIDE
<b>Associated Goals</b>	Street Outreach	Emergency Shelter	Permanent Housing for Homeless Persons
<b>Description</b>	Outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individual needs and 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 throughout Florida.	Operation and maintenance funding for emergency shelters.	Homeless prevention activities and rapid re-housing activities for homeless persons (especially persons that are chronically homeless, families with children, veterans and unaccompanied youth) or persons at high risk for homelessness to make the transition to permanent housing and self-sufficiency.
<b>Basis for Relative Priority</b>	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.

**HOME and HTF Related Priority Needs:**

<b>Priority Need</b>	<b>9. Affordable Rental Housing</b>	<b>10. Affordable Ownership Housing</b>
<b>Priority Level</b>	High	High
<b>Population</b>	Extremely Low, Low, Large Families, Families with Children, Elderly, Public Housing Residents	Low Moderate
<b>Geographic Areas</b>	STATEWIDE	STATEWIDE
<b>Associated Goals</b>	Rental and Homeownership Activities (CHDOs), Affordable Rental Housing, Affordable Rental Housing for Extremely Low Income	Housing Rehabilitation, Rental and Homeownership Activities (CHDOs), Affordable Homeownership Housing
<b>Description</b>	Activities involving the production and rehabilitation of affordable housing units and rental assistance to extremely low-, very low-, and low-income beneficiaries.	Activities involving homebuyer assistance, such as down payment assistance, construction and rehabilitation activities for low- and moderate-income beneficiaries.
<b>Basis for Relative Priority</b>	Needs Assessment, Market Analysis, Stakeholder and public consultation.	Needs Assessment, Market Analysis, Stakeholder and public consultation.

**HOPWA Related Priority Needs:**

<b>Priority Need</b>	<b>11. Short Term Rent, Mortgage and Utility Payments</b>	<b>12. Permanent Housing Placement Assistance</b>	<b>13. Tenant Based Rental Assistance</b>	<b>14. Resource identification services</b>	<b>15. Housing information services</b>	<b>16. Case management and other supportive services</b>
<b>Priority Level</b>	High	High	High	High	High	High
<b>Population</b>	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families
<b>Geographic Areas</b>	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE
<b>Associated Goals</b>	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services
<b>Description</b>	Financial housing assistance in the form of rent, mortgage and utility payments for persons with HIV/AIDS.	Assistance to housing facility providers to provide housing placement services for persons with HIV/AIDS.	Assistance to housing providers to provide tenant based rental assistance to persons with HIV/AIDS.	Assistance to providers of resource identification services to persons with HIV/AIDS.	Assistance to providers of housing information services to persons with HIV/AIDS.	Assistance to housing facility providers to provide case management and supportive services, such as housing assistance, counseling and health care services to persons with HIV/AIDS.
<b>Basis for Relative Priority</b>	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.

**HOPWA Related Priority Needs (continued):**

<b>Priority Need</b>	<b>17. Short-term supported housing</b>	<b>18. Facility-based housing development and preservation</b>	<b>19. Facility-based housing operations activities</b>	<b>20. Transitional housing</b>	<b>21. Administrative services</b>
<b>Priority Level</b>	High	High	High	High	High
<b>Population</b>	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families	Persons with HIV/AIDS and their Families
<b>Geographic Areas</b>	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE	STATEWIDE
<b>Associated Goals</b>	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services	Housing and Supportive Services
<b>Description</b>	Short-term supporting housing (emergency shelter), including hotel/motel vouchers benefitting persons with HIV/AIDS and their families.	Support for facility-based housing development activities, including acquisition, rehabilitation, repair, conversion, new construction, and/or leasing, benefitting persons with HIV/AIDS and their families.	Support for facility-based housing operations activities, including leasing/operating, master leasing a building or scattered site units, Project-Based Rental Assistance (PBRA), benefitting persons with HIV/AIDS and their families.	Support for transitional housing benefitting persons with HIV/AIDS and their families.	Grantee and project sponsor's administrative services related to HOPWA funding.
<b>Basis for Relative Priority</b>	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.	Needs Assessment, Market Analysis, Stakeholder and public consultation, HOPWA CAPER.

## Narrative (Optional)

The priority needs that have been established for the five-year planning period include those in the above table. These were based on the data presented in the Needs Assessment and Market Analysis sections of this Consolidated Plan along with stakeholder input. Priorities are organized around funding to align with program guidelines and eligible activities.

Florida's CDBG priorities are Housing Rehabilitation, Economic Development, Commercial Revitalization and Neighborhood Revitalization. Coronavirus response and recovery is a new priority need identified in the wake of the COVID-19 pandemic; needs in this category may overlap with other identified needs and are expected to be most acute in program years 2021 and possibly 2022.

For the Small Cities CDBG program, allowing the local governments to establish their specific priorities under the broad program priorities with each application has been the most beneficial to local subrecipients. It allows DEO to be more flexible in funding projects that are responsive to the local communities 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 or may result in a local community not submitting an application because the state-established priority needs are not responsive to a local priority. The annual funding allocation for the four CDBG program areas is based on the applications received in the past and based on comments received from the public during the preparation of the Annual Action Plan.

Priority Needs identified for the ESG program are:

- Outreach strategies to homeless persons (especially unsheltered homeless persons) to assess their individual needs and 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 throughout Florida.
- Operation and maintenance funding for emergency shelters.
- Homeless prevention activities and rapid re-housing activities for homeless persons (especially persons that are chronically homeless, families with children, veterans and unaccompanied youth) or persons at high risk for homelessness to make the transition to permanent housing and self-sufficiency.

Priority needs for HOME and Housing Trust Fund activities include:

- Activities involving the development and rehabilitation of affordable housing units and rental assistance to extremely low-, very low-, and low-income beneficiaries.
- Activities involving homebuyer assistance, such as down payment assistance, construction and rehabilitation activities for low- and moderate-income beneficiaries.

HOPWA priorities include the following investments to serve people with HIV/AIDS and their families:

- 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
- Facility-based housing development and preservation
- Facility-based housing operations activities
- Transitional housing

## SP-30 Influence of Market Conditions – 91.315(b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<ul style="list-style-type: none"> <li>• Availability of affordable single family and multifamily rental housing stock for families of all sizes where owners will be willing to accept TBRA</li> <li>• Availability of administrative agencies to determine eligibility terms and conditions of such programs</li> </ul>
TBRA for Non-Homeless Special Needs	<ul style="list-style-type: none"> <li>• Availability of affordable single family and multifamily rental housing stock for persons with disabilities and their families where owners will be willing to accept TBRA</li> <li>• Availability of administrative agencies to determine eligibility terms and conditions of such a program</li> <li>• Availability of administering agencies to evaluate and ensure accommodations and modifications for persons with disabilities and their families</li> <li>• Availability of supportive services, when necessary</li> </ul>
New Unit Production	<ul style="list-style-type: none"> <li>• Local land use policies and jurisdiction comprehensive planning goals that support the development of accessible multifamily housing stock for lower income renters, including persons with disabilities and their families</li> <li>• Current cost of materials for new unit production</li> <li>• Availability of incentives to developers to produce new single family and multifamily affordable housing units</li> </ul>
Rehabilitation	<ul style="list-style-type: none"> <li>• Current cost of materials for rehabilitation</li> <li>• Availability of funding for housing rehabilitation activities</li> </ul>
Acquisition, including preservation	<ul style="list-style-type: none"> <li>• Availability of funding for acquisition activities</li> <li>• Evaluation of fair market prices for home purchases</li> <li>• Cost of materials for redevelopment of historic housing structures</li> </ul>

**Table 30 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

### Introduction

The table below lists the resources anticipated to be available to assist the State fulfill its five-year Consolidated Plan housing and community development goals. It includes funds from the Federal disaster recovery program.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	\$28,356,696	\$68,162	\$9,970,928	\$38,395,786	\$113,426,784	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	\$20,047,525	\$8,595,326	\$0	\$28,642,851	\$80,190,100	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR 92

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$8,049,041			\$8,049,041	\$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 Homeless Prevention Admin HMIS Activities	\$5,911,591			\$5,911,591	\$23,646,364	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
NHTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$14,371,181	\$0.00	\$0.00	\$14,371,181	\$57,484,724	The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93.
CDBG-DR	public - federal	Disaster Recovery	n/a	n/a	n/a	\$54,458,405	\$269,242,353	DR funds from Hurricanes Irma, Hermine/Matthew, and Michael.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
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 31 - Anticipated Resources**

**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 does not require matching funds, but the state administered program does consider leveraged funds as a factor in its criteria for selecting projects.

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 match for all direct recipients. 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." Types of acceptable matching contributions include third-party cash match or in-kind contributions.

Match requirements do not apply to ESGCV 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 of the programs listed here to enable assisted units to serve more extremely low-income residents than could be done by each program separately.

**If appropriate, describe publicly owned land or property located within the state 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.

## SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Department of Economic Opportunity	Departments and agencies	Economic Development Neighborhood improvements Public facilities	State
Florida Housing Finance Corporation	Departments and agencies	Ownership Rental	State
Florida Department of Health	Departments and agencies	Non-homeless special needs	State
Florida Department of Children and Families	Departments and agencies	Homelessness	State

**Table 32 - Institutional Delivery Structure**

### Assess Strengths and Gaps in the Institutional Delivery System

The state of Florida has a strong network of partners through which programs are delivered. Where gaps exist, these are associated with lack of funding and lack of capacity of nonprofits in rural areas to address the wide variety of needs among low income populations. A list of partners is included in the Grantee Unique Appendix attached to this Consolidated Plan. An assessment of strengths and gaps is summarized below by program.

- CDBG:** The Florida Small Cities CDBG program is in the Bureau of Small Cities and Rural Communities within the Florida Department of Economic Opportunity (DEO). DEO follows sections 290.0401 through 290.048, Florida Statute, and administers Chapter 73C-23, Florida Administrative Code (F.A.C.) for the delivery of CDBG funds. DEO also uses an ongoing continuous improvement process to assess the CDBG program. The Small Cities CDBG staff conduct annual workshops on the funding application process and workshops for grant subrecipients to explain the grant agreement requirements. In addition in 2020 and 2021, DEO is conducting an assessment of the Small Cities CDBG Program to identify opportunities for improvement, including potential improvements to institutional structure.
- HOME and HTF:** The daily operations of the HOME and HTF programs is in the Homeownership Department of Florida Housing Finance Corporation (FHFC). The Assistant Director of Homeownership and two Federal Loan Program Managers are the daily contacts and serve as Grant Managers for the program with additional oversight provided by the Director of

Homeownership and the Executive Director of FHFC. Additionally, FHFC contracts with three service entities that provide a whole suite of services including credit underwriting, construction and permanent loan servicing and compliance monitoring for FHFC's Rental and Homeownership portfolios. FHFC also contracts with four environmental firms to provide the environmental assessments. The grant managers work closely with the contracted servicer and environmental providers, review all documents and ensure all conditions are adequately adhered to during the development of the housing. FHFC contracts with three firms to provide all the legal and closing documents for funded developments. A Multifamily Programs staff person also provides an additional level of review of credit underwriting and loan closing documents to ensure compliance with all applicable state and federal requirements. The grant managers enter all required set-up and funding information into the Integrated Disbursement Information System (IDIS) while the Program accounting department handles the responsibility of the drawdowns. FHFC's Quality Assurance Department monitors its contracted service providers to ensure compliance with the contractual obligations to FHFC as well as state and federal laws and regulations, FHFC rules and procedures. FHFC also has an Asset Management Department that works closely with its contracted Compliance Monitors to verify funded developments are providing safe, decent, affordable housing by monitoring financial, physical and occupancy compliance with regulatory documents. Institutional Delivery system has been in place for a very long time. Applicants for FHFC's programs understand the structure of the system and work well with all of FHFC's contracted service providers.

- **ESG.** The Emergency Solutions Grant (ESG) program is managed in the Office on Homelessness within the Florida Department of Children and Families (DCF). DCF is working with its Managing Entities, Community Based Care agencies, and CoCs to support collaboration efforts to serve eligible populations that may be engaged with other DCF programs. The DCF Office on Homelessness works closely with community partners to identify gaps, address the needs of different homeless populations throughout the state, and gather input regarding performance standards and outcome measures for all funding. This information is used in shaping program initiatives and utilizing funds to design innovative strategies for addressing the current economic climate.
- **HOPWA.** The State Housing Opportunities for Persons with AIDS (HOPWA) program is in the Bureau of Communicable Diseases within the Florida Department of Health (DOH). DOH currently contracts with project sponsors to administer the State HOPWA Program in a designated geographic area, the majority of which are rural. The HOPWA program manager provides consultation and technical assistance to DOH staff statewide through on-site visits, conference calls, meetings and program monitoring. Core strengths of the institutional delivery system are that project sponsors have extensive experience providing HOPWA services, are very familiar with their service area and community and maintain strong engagement with partners. Weaknesses include challenges of the contracting process, structural barriers to implementing new activities (i.e., averse to change), limitations of county health departments in providing

services relative to community-based organizations (i.e., more bureaucracy), and limited resources in rural areas.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X		X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X		X
Child Care	X		X
Education	X		X
Employment and Employment Training	X	X	X
Healthcare	X		X
HIV/AIDS	X		X
Life Skills	X		X
Mental Health Counseling	X	X	X
Transportation			X
<b>Other</b>			

**Table 33 - Homeless Prevention Services Summary**

**Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction**

Both the ESG and the HOPWA programs provide funding for the services identified above. Generally, the state grantor programs allocate specific amounts of funding to units of local governments and non-profit housing providers in small jurisdictions to implement programs and initiatives locally and

distribute the funds for the direct benefit of people experiencing homelessness and persons with HIV/AIDS. Funds are designated for eligible activities such as rental assistance, utility assistance, transitional housing and mental health counseling services. The HOPWA program places emphasis on the connection between housing assistance and appropriate supportive services available through HOPWA and other funding sources, such as Ryan White Part B and state general revenue. Therefore, support services that contribute to stable housing will be readily available to HOPWA clients.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

As noted above, the state of Florida has a strong network of partners through which programs are delivered. Where gaps exist, these are associated with lack of funding and lack of capacity of nonprofits in rural areas to address the wide variety of needs among low-income populations. Strengths and gaps of the service delivery system, specifically for special needs populations and persons experiencing homelessness, are summarized below.

**Strengths:**

- By allowing local service providers to designate funding, the grantor agency can assure confidence that the funding is being allocated to services and areas of the community that have the most urgent need.
- Local service providers understand the needs of their particular community, so they are constantly updating the latest data in order to properly allocate funding to the segment of the population with the highest need.
- Local services providers are well connected in small jurisdictions, this allows the providers to choose the most financially feasible options to ensure that each federal funding dollar is spent wisely.

**Gaps:**

- Service providers for specific types of eligible activities, such as mental health counseling, may not be available in the direct vicinity of a small jurisdiction.
- Local service providers may not have the staff capacity to administer additional programs and services.
- The amount of funding for a small jurisdiction may not be sufficient to address urgent needs.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

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.

## SP-45 Goals Summary – 91.315(a)(4)

### 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	Economic Development	CDBG: \$42,535,044	Jobs created/retained: 275 Jobs
2	Commercial Revitalization	2020	2024	Non-Housing Community Development	STATEWIDE	Commercial Revitalization	CDBG: \$7,089,174	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4200 Persons Assisted
3	Housing Rehabilitation	2020	2024	Affordable Housing	STATEWIDE	Housing Rehabilitation, Affordable Rental Housing, Affordable Ownership Housing	CDBG: \$35,445,870	Homeowner Housing Rehabilitated: 725 Household Housing Units
4	Neighborhood Revitalization	2020	2024	Non-Housing Community Development	STATEWIDE	Neighborhood Revitalization	CDBG: \$49,624,218	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 29,400 Persons Assisted
5	Emergency Shelter and Street Outreach	2020	2024	Homeless	STATEWIDE	Emergency Shelters; Street Outreach to Homeless Persons	ESG: \$17,734,773	Homeless Person Overnight Shelter: 10,000 Persons Assisted
6	Permanent Housing for Homeless Persons	2020	2024	Affordable Housing	STATEWIDE	Homeless Prevention and Rapid Rehousing	ESG: \$11,823,182	Housing for Homeless added: 5300 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Rental and Homeownership Activities (CHDOs)	2020	2024	Affordable Housing	STATEWIDE	Affordable Ownership Housing, Affordable Rental Housing	HOME: \$15,035,644	Affordable housing units added: 125 units
8	Affordable Homeownership Housing	2020	2024	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$25,059,406	Affordable housing units added: 750 units
9	Affordable Rental Housing	2020	2024	Affordable Housing	STATEWIDE	Affordable Rental Housing	HOME: \$60,142,575	Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted. Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted
10	Affordable Rental Housing for Extremely Low Income	2020	2024	Affordable Housing	STATEWIDE	Affordable Rental Housing	Housing Trust Fund: \$71,855,905	Rental units constructed: 250 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Housing and Supportive Services	2020	2024	Affordable Housing Non-Homeless Special Needs	STATEWIDE	STRMU Payments; Permanent Housing Placement Assistance; TBRA; Resource identification services; Housing information services; Case management and other supportive services; Short-term supported housing; Facility-based housing development and preservation; Facility-based housing operations activities; Transitional housing; Administrative services	HOPWA: \$40,245,205	Tenant-based rental assistance / Rapid Rehousing: 750 Households Assisted Homelessness Prevention: 6,000 Persons Assisted
12	Disaster Recovery	2020	2024	Disaster Recovery	STATEWIDE	Disaster Recovery	CDBG-DR: \$323,700,758	Other: TBD
13	Coronavirus Response and Recovery	2020	2024	Non-Housing Community Development	STATEWIDE	Coronavirus Response and Recovery	ESG-CV2: \$65,511,297 CDBG-CV: TBD	Tenant-based rental assistance/ Rapid Rehousing (Households Assisted): TBD Homelessness Prevention: TBD Homeless Person Overnight Shelter (Persons Assisted): TBD Housing for Homeless: TBD Street Outreach to unsheltered individuals/families: TBD Other: TBD

Table56– Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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	<b>Goal Name</b>	Commercial Revitalization
	<b>Goal Description</b>	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	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	The primary objectives of the Housing Rehabilitation category are to improve housing conditions for low- and moderate-income persons.
4	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	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	<b>Goal Name</b>	Emergency Shelter and Street Outreach
	<b>Goal Description</b>	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 annual ESG program awards.
6	<b>Goal Name</b>	Permanent Housing for Homeless Persons
	<b>Goal Description</b>	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 (homeless 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	<b>Goal Name</b>	Rental and Homeownership Activities (CHDOs)
	<b>Goal Description</b>	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	<b>Goal Name</b>	Affordable Homeownership Housing
	<b>Goal Description</b>	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	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	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.

<b>10</b>	<b>Goal Name</b>	Affordable Rental Housing for Extremely Low Income
	<b>Goal Description</b>	The NHTF Program, administered by FHFC, funds affordable rental housing for extremely low-income (ELI) 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.
<b>11</b>	<b>Goal Name</b>	Housing and Supportive Services
	<b>Goal Description</b>	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.
<b>12</b>	<b>Goal Name</b>	Disaster Recovery
	<b>Goal Description</b>	Community development related to disaster recovery through the CDBG-DR program.
<b>13</b>	<b>Goal Name</b>	Coronavirus Response and Recovery
	<b>Goal Description</b>	Responding to the housing and community development needs stemming from the COVID-19 pandemic and providing funds for coronavirus response in homeless assistance and prevention services.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

FHFC plans to provide down payment assistance for 750 new affordable housing units for low- and moderate-income households with an income of less than 80 percent AMI. FHFC plans to provide construction funds for the production of 875 rental units with either HOME (625 units for low and income households with an income of less than 60 percent AMI) or NHTF funds (250 units for ELI income households with an income of less than 30 percent AMI). FHFC plans to provide rental assistance to 250 low income households with an income of less than 60 percent AMI.

Additional affordable housing services and opportunities for extremely low-, low-income eligible beneficiaries funded through the HTF, ESG, and HOPWA programs are not included above.

**SP-50 Public Housing Accessibility and Involvement – 91.315(c)**

**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

N/A; the State of Florida does not own or operate any public housing units.

**Activities to Increase Resident Involvements**

N/A; the State of Florida does not own or operate any public housing units.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

N/A.

**Plan to remove the ‘troubled’ designation**

N/A; the State of Florida does not own or operate any public housing units.

## **SP-55 Barriers to affordable housing – 91.315(h)**

### **Barriers to Affordable Housing**

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.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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 the FHFC, these agencies will continue to allocate federal and state resources to affordable housing including housing rehabilitation, emergency shelter, transitional housing, permanent housing for people experiencing homelessness, housing services, rental and homeownership activities through CHDOs and the new construction of affordable housing.

In addition, the state will increase housing choice through its actions to affirmatively further fair housing choice including:

- Publishing fair housing resource materials on agency websites in different languages;
- Coordinating with the Florida Commission on Human Relations in conducting annual workshops on fair housing;
- Requiring grant recipients to conduct fair housing activities; and
- Having a local fair housing coordinator to address complaints.

## **SP-60 Homelessness Strategy – 91.315(d)**

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

DCF, through the ESG Program, provides funding for activities such as emergency shelters, street outreach and homeless prevention and rapid re-housing for homeless persons throughout Florida. The ESG Program administrators rely on the 27 CoC lead agencies throughout Florida to create and implement outreach strategies that are successful in their particular jurisdiction. The most implemented outreach strategy is the point-in-time (PIT) counts. PIT counts can be carried out in two ways: the survey method and the in-person interview method. For the survey method, the CoC lead agency will collect data from shelter service providers through the Homeless Management Information System regarding the number of sheltered homeless individuals on a specific night. For the in-person interview method, the CoC lead agency will employ surveyors to go out into the public to interview unsheltered homeless persons to collect data on the numbers and reasons for homelessness on a specific night.

### **Addressing the emergency and transitional housing needs of homeless persons**

The State will allocate up to 60 percent of the annual grant award to the emergency shelter component, which will fund local providers of emergency housing. CoC lead agencies will carry-out homeless services programs through collaboration and planning with local service providers.

Other transitional housing projects will be up for renewal grants in the CoC Notice of Funding Availability (NOFA) annually during the five-year planning period. Such housing units are critical to the homeless service plans, as the 13,540 transitional housing beds make up over one-third of the available homeless housing units in Florida.

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 more than 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.**

Much like the outreach strategies described in the paragraph above, the ESG Program relies on the 27 CoC agencies and their homeless service providers to provide the numbers and reasons for their respective jurisdiction's homeless population in relation to determining emergency and transitional housing needs of

homeless persons. In order to address the emergency and transitional housing 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. Other programs can include 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, but are able to do so in order 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.

FHFC administers the NHTF Program for the state of Florida. The use of the NHTF Program also allows homeless households to move into affordable permanent housing through the set aside units that are integrated into larger general occupancy developments. Tenants for these units will be referred by supportive services providers such as CoC agencies and other providers serving homeless persons.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and 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 properties at 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.

## **SP-65 Lead based paint Hazards – 91.315(i)**

### **Actions to address LBP hazards and increase access to housing without LBP 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 Renovation, Repair and Painting (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 measure undertaken to safely remove and dispose of the paint in accordance with HUD requirements.

### **How are the actions listed above integrated into housing policies and procedures?**

The Florida Department of Health encourages the Renovation, Repair and Painting (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 measure undertaken to safely remove and dispose of the paint in accordance with HUD requirements.

## **SP-70 Anti-Poverty Strategy – 91.315(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The state of Florida does not have a formally adopted statewide anti-poverty strategy. In a holistic sense, the entirety of Florida's Consolidated Plan Strategy and Action Plan is antipoverty 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 assistance provided through 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, as well as other resources to assist businesses and entrepreneurs with establishing businesses in Florida and creating 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.

- Types of Financial Literacy programs include, the Florida Financial Literacy Council and the Florida Prosperity Partnership (FPP). The Florida Financial Literacy Council develops recommendations to aid the Florida Department of Financial Services in developing programs and resources aimed at increasing financial literacy among Floridians. The FPP is a coalition of county governments dedicated to creating unified, coordinated, and collaborative statewide effort to educate, train, and put money directly back into the hands of Florida citizens to increase financial stability for low- and moderate- income families.
- Types of education and training programs include Florida Dislocation Workers Reemployment and Emergency Assistance Coordination (REACT), SNAP Employment and Training Program (SNAP E&T), Job Corps and Veteran's Workforce Program. REACT provides assistance to regional workforce development boards, local government officials, and employers and workers for technical assistance and expertise, labor market statistics and job relocation services. SNAP E&T emphasizes work, self-sufficiency and personal responsibility by providing temporary financial assistance and job training. Job Corps assists economically disadvantaged young adults to become responsible, employable and productive citizens by providing them with opportunities to develop vocational, educational and social skills needed to succeed. The Veteran's Workforce

Program provides priority workforce services to veteran customers in the one-stop career centers around the state.

- Types of safety net programs include Unemployment Insurance and TANF. The Unemployment Insurance program provides temporary, partial wage replacement benefits to qualified workers who are unemployed through no fault of their own. The TANF program emphasizes work, self-sufficiency, and personal responsibility structured to enable participants to move from welfare to economic self-sufficiency. Other types of safety net programs include CDBG, HOME, ESG, and HOPWA. These HUD funded programs provide funding for jurisdictions to carry out activities such as housing rehabilitation, emergency shelter assistance, and housing opportunities for persons with HIV/AIDS for low to moderate income households.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

Programs such as the Section 8 voucher and rental assistance program, carried out by public housing authorities and other nonprofit governmental agencies in jurisdictions throughout Florida, can be an effective poverty reducing solution by helping to make housing affordable.

The Florida Weatherization Assistance Program (WAP) is funded by the U.S. Department of Energy and receives supplemental funding from the U.S. Department of Health and Human Services. The program reduces the monthly energy burden on low-income households by implementing improvements to make homes more energy efficient and reduce utility bills. Eligible applicants may not have a total household income of more than 200 percent above the national poverty level. Preference is given to elderly (60 years-plus) or physically disabled residents, families with children under 12 and households with a high energy burden. Types of assistance include installation of attic ventilation, installation of solar screens, repair or replacement of water heaters, addresses air filtration with weather stripping, caulking, thresholds, minor repairs to walls, ceilings and floors, and window and door replacement. This program is administered by DEO and is coordinated with other poverty reducing programs within this affordable housing plan.

In coordination with the Weatherization Assistance Program (WAP), the Low-Income Home Energy Assistance Program (LIHEAP) is also administered by DEO and helps low-income families with heating and cooling costs. DEO roles include applying for funding from the federal government, distributing funding in the form of grants to nonprofit agencies and local governments (local agency providers), monitoring local agency providers to ensure that they administer the funding in compliance with state and federal laws and rules, and providing technical assistance to local agency providers to help them comply with state and federal requirements. Citizens must apply directly to their local government or local agency provider and may apply up to three times per calendar year.

Along with the programs mentioned above, the state of Florida categorizes HUD funded programs such as CDBG, HOME, ESG, NHTF and HOPWA that provide assistance with affordable housing services and opportunities that in-turn help reduce poverty and are coordinated with other affordable housing

programs as “Safety Net Programs.” In addition to CDBG, HOME, ESG, NHTF and HOPWA, the program funding and services provided through the programs listed below are commonly available to beneficiaries of other government assisted affordable housing programs:

Temporary Assistance to Needy Families (TANF) - The Welfare Transition program administered by DCF, emphasizes work, self-sufficiency and personal responsibility structured to enable participants to move from welfare to economic self-sufficiency. To accomplish this, the Florida Legislature, using federal/state funds and statutory requirements, has developed a program structured to deliver services to meet the following goals:

- Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.
- Develop opportunities for families that provide for their needs, enhance their well-being and preserve the integrity of the family free of impediments to self-reliance.
- End the dependence of families on government assistance by emphasizing work, self-sufficiency and personal responsibility, while meeting the transitional needs of program participants who need short-term assistance toward achieving productive lives and gaining the responsibility that comes with self-sufficiency.
- Take full advantage of the flexibility provided under state and federal law that allows for providing job preparation and intervention programs to enable welfare recipients to move from welfare to work.
- Prevent and reduce the incidence of out-of-wedlock pregnancies.
- Encourage the formation and maintenance of two parent families.
- Provide oversight and policy direction to the program and ensure cooperation and accountability among state agencies and service providers to deliver needed services.

The Community Service Block Grant (CSBG) Program is administered by the DEO. It is designed to provide a range of services to assist low-income people in attaining the skills, knowledge and motivation necessary to achieve self-sufficiency. Grants to local governments and nonprofit agencies provide a variety of antipoverty services such as emergency health, food, housing, day care, transportation assistance; housing counseling; financial management assistance; nutrition programs including federal surplus food distribution, community gardening projects, food banks, job counseling, placement and training services, and homeless prevention programs.

The Supplemental Nutrition Assistance Program (SNAP – formerly known as Food Stamps) helps ensure that eligible low-income families and individuals are able to purchase nutritional foods needed to maintain and promote good health. Benefits are intended to supplement other household income and may only be used to purchase food. This program is administered by the Florida Department of Children and Families.

## **SP-80 Monitoring – 91.330**

**Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

### **CDBG Monitoring:**

The Small Cities CDBG program uses a regional approach that divides the state into seven areas for managing the program and monitoring subgrant recipients. The grant managers are assigned to regions so that they can become familiar with the area's needs, provide community-based technical assistance, and resolve local subgrant-related issues.

The Small Cities CDBG Program currently has 22 checklists that have been developed to assist grant managers in monitoring subgrant activities. The grant managers determine which of these checklists are needed for each on-site or desk monitoring. These checklists ensure that all phases of contract administration that apply to the respective subgrant are appropriately reviewed during the subgrant period.

At least one on-site monitoring visit is conducted for each subgrant agreement during the term of the grant. All monitoring is conducted in accordance with HUD guidelines, as well as applicable federal and state rules and regulations. Projects that are determined to be a "High Risk" may receive a minimum of three on-site visits. The first on-site monitoring visit is typically made when approximately 25 percent of funds have been expended; a second visit is conducted when construction is about 80 percent complete.

The grant manager conducts additional on-site and desk monitoring visits as needed. Subgrant recipients that are experiencing difficulties are monitored as often as is necessary to ensure compliance with federal and state laws, rules and regulations. These visits may include extensive technical assistance to help the subgrantee build administrative capacity.

Following each monitoring visit, the grant manager prepares a monitoring report. The report lists any deficiencies that were discovered during the monitoring visit and the actions that the subgrantee must take to resolve them. The recipient must respond to all findings and to those concerns that require corrective action.

DEO reviews the recipient's annual audit report. If applicable, to ensure that no audit findings exist that impact the subgrantee's administration of the program. If DEO discovers that the subgrantee's auditor has identified areas that need to be addressed, the local government is notified of the findings and the corrective actions that should be taken to resolve the issue.

Finally, the Small Cities CDBG Program uses a closeout checklist that serves as a final desk review of the project. Contracts are administratively closed when all program requirements have been fulfilled and

final payment has been made. Final closeout occurs when all required financial audits have been provided to DEO and any audit findings have been resolved.

### **HOME and NHTF Monitoring:**

FHFC maintains written procedures on compliance monitoring. This section provides a high-level summary of HOME and NHTF monitoring procedures.

For homeownership programs, FHFC annually monitors to ensure that the initial buyers are continuing to occupy acquired property as their principal residence.

For rental developments, in situations where tenants may be displaced as a result of the construction or rehabilitation of the development, FHFC reviews for compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies. The owners/developer must submit information regarding selection of a management company, which must be approved by FHFC prior to the company assuming development management responsibilities. The compliance monitoring process includes pre-occupancy conferences, review of property program reports and income certification from each development, a management review and a physical inspection.

Prior to the leasing of a property, the compliance monitor conducts a pre-occupancy conference/training with the developer or management company personnel to provide complete instructions on items related to federal and state requirements, including the agreements in the land use restriction agreement for the particular property.

Management reviews of properties are conducted as follows:

1. For properties with units occupied at the time of loan closing, the monitor shall conduct initial review on or before the 120<sup>th</sup> day after loan closing, and subsequent reviews will be conducted throughout the period of affordability as listed in the Subsequent Review Schedule.
2. For properties with no units occupied at the time of loan closing, the monitor shall conduct the initial review on or before the 120<sup>th</sup> day after the leasing of any HOME-assisted unit, and subsequent reviews will be conducted throughout the period of affordability as listed in the Subsequent Review Schedule.
3. A follow up review may be required, based on the quantity and nature of the issues found by the Services and/or failure to meet Uniform Physical Condition Standards during a management review.

FHFC monitors all HOME and NHTF activities to ensure compliance with program guidelines and certifies that proposed program activities are consistent with the State Consolidated Plan approved by HUD. In order to ensure the requirements of the Davis-Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland Act for developments receiving a HOME loan, FHFC receives documents sufficient to certify to HUD that these requirements are being met.

FHFC also carries out activities and procedures and requires developers receiving HOME and NHTF funding to:

- Provide an affirmative marketing policy for each development;
- Pursuant to the Minority and Women’s Business Enterprises Outreach Program, encourage subrecipients, prime contractors, and owners of HOME-assisted housing to use minority and women-owned business enterprises that recipients may contact; and
- Carry out activities and procedures in accordance with Section 3 to ensure that employment and other economic opportunities generated by HOME funding shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. State recipients, subrecipients and prime contractors will be encouraged to make efforts to reach Section 3 residents and business concerns through employment, training opportunities, and contracting.

Pursuant to HUD regulations, 24 CFR 92.351, FHFC has adopted affirmative marketing guidelines and enforces the guidelines by requiring HOME Program Agreement and the Firm Commitment Letter to include the development's affirmative marketing strategies. Prior to funding, the marketing strategy is carefully analyzed, and a market study or feasibility report is required if adequate information is not found in the development's appraisal.

FHFC's affirmative marketing guidelines require policies and procedures to be included in an Affirmative Fair Housing Monitoring Plan for the following elements:

- Informing the public, owners and potential tenants;
- The advertising of vacant units;
- Owner's outreach efforts;
- Recordkeeping;
- Assessment of the affirmative marketing efforts of owners; and
- Additional state or federal requirements as enumerated in HUD Handbook 8025.1 REV-2.

**HOPWA Monitoring:** The DOH has a comprehensive contract management process that ensures contracting methods are administratively efficient and clear to contract managers. State HOPWA contract monitoring must be done per federal and state requirements. DOH contract managers at the local level are responsible for enforcing HOPWA contract terms and conditions, including monitoring project sponsors for compliance with federal regulations, performance standards, Florida Statutes, and DOH policy. DOH’s process encourages optimal project sponsor performance. Project sponsors are required to have on-site monitoring at least once during the contract year. A written report is submitted to project sponsors identifying strengths, weaknesses, and areas of concern. Adverse findings are addressed with corrective action plans or other appropriate measures. Corrective action requirements are specific with reasonable timeframes and suggested methods for resolution. Documentation reflecting the resolution of corrective action(s) must be reported to the contract manager. The contract

manager and project sponsor must follow the appropriate corrective action procedures that are currently in place. The DOH staff provides follow-up site visits and technical assistance. The DOH uses a standardized monitoring tool for programmatic and fiscal monitoring of HOPWA project sponsors. The HIV/AIDS Section's State HOPWA Program Coordinator monitors county health departments (CHDs) serving as the project sponsor.

For DOH contract managers, a Florida State HOPWA Program Contract Monitoring Tool template containing the programmatic and fiscal monitoring elements is provided in advance of the required monitoring timeframe. The Florida State HOPWA Program Contract Monitoring Tool is adapted to reflect the contract negotiated by the contract manager and project sponsor, and include any additional agreements and allowable activities agreed to by both parties to conform to their needs. While this serves as a template, it includes required elements as per the procurement, contract tasks/deliverables, DOH contract policies and procedures, Florida State HOPWA Program guidelines, and HUD's HOPWA Grantee Oversight Resource Guide. Therefore, all the items listed in the tool CANNOT be deleted (just check the box of "N/A" for an item that is "Not Applicable") nor the rating system altered. However, items may be added as deemed necessary. The HOPWA contract monitoring tool template is only modified to reflect additional contract provisions specific to an area.

Contract managers are responsible for ensuring project sponsors monitor any subcontractors for compliance with their contract just like the contract manager monitors the project sponsor for contract compliance, as well as supporting project sponsors with technical assistance as needed.

**ESG Monitoring:** The state ESG Program, administered by the Florida Department of Children and Families (DCF), uses a tiered method for monitoring ESG grant recipients throughout the state. The Office of Homelessness staff undertakes periodic desk reviews for low-risk recipients. These reviews consist of reviewing individual case files, tracking access and performance outcomes and reviewing quarterly reports for any issues. In addition to desk monitoring, staff performs on-site monitoring visits for higher-risk or first-time ESG grant recipients. DCF also assigns contract managers who are responsible for monitoring the contracted grantee and assisting the grantee with any training or technical assistance necessary for success. A final level review, conducted by the Contract Oversight Unit, involves an in-depth review of financial management systems, compliance with federal laws, accessibility and other such cross-cutting federal requirements.

## 2020 Annual Action Plan

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

#### Introduction

The table below lists the resources anticipated to be available to assist the State fulfill its five-year Consolidated Plan housing and community development goals. It includes funds from the Federal disaster recovery program.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	\$28,356,696	\$68,162	\$9,970,928	\$38,395,786	\$113,426,784	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	\$20,047,525	\$8,595,326	\$0	\$28,642,851	\$80,190,100	The annual allocation and any program income or prior year resources will be allocated to eligible HOME categories per 24 CFR 92

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$8,049,041			\$8,049,041	\$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	\$5,911,591			\$5,911,591	\$23,646,364	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
NHTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$14,371,181	\$0	\$0	\$14,371,181	\$57,484,724	The annual allocation will be allocated to eligible NHTF categories per 24 CFR 93.
CDBG-DR	public - federal	Disaster Recovery	n/a	n/a	n/a	\$54,458,405	\$269,242,353	DR funds from Hurricanes Irma, Hermine/Matthew, and Michael.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
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 57 - 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**

CDBG Program does not require matching funds, but the state administered program does consider leveraged funds as a factor in its criteria for selecting projects.

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 match for all direct recipients. 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." Types of acceptable matching contributions include third-party cash match or in-kind contributions.

ESG-CV funds are not subject to match requirements.

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 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 of the programs listed here to enable assisted units to serve more extremely low-income residents than could be done by each program separately.

**If appropriate, describe publicly owned land or property located within the state 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.

## 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	2020	Non-Housing Community Development	STATEWIDE	Economic Development	CDBG: \$8,507,009	Jobs created/retained: 55 Jobs
2	Commercial Revitalization	2020	2020	Non-Housing Community Development	STATEWIDE	Commercial Revitalization	CDBG: \$1,417,835	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 840 Persons Assisted
3	Housing Rehabilitation	2020	2020	Affordable Housing	STATEWIDE	Housing Rehabilitation, Affordable Rental Housing, Affordable Ownership Housing	CDBG: \$7,089,174	Homeowner Housing Rehabilitated: 145 Household Housing Unit
4	Neighborhood Revitalization	2020	2020	Non-Housing Community Development	STATEWIDE	Neighborhood Revitalization	CDBG: \$9,924,844	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,800 Persons Assisted
5	Emergency Shelter and Street Outreach	2020	2020	Homeless	STATEWIDE	Emergency Shelters; Street Outreach to Homeless Persons	ESG: \$3,546,955	Homeless Person Overnight Shelter: 2000 Persons Assisted
6	Permanent Housing for Homeless Persons	2020	2020	Affordable Housing	STATEWIDE	Homeless Prevention and Rapid Rehousing	ESG: \$2,364,636	Housing for Homeless added: 1050 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Rental and Homeownership Activities (CHDOs)	2020	2020	Affordable Housing	STATEWIDE	Affordable Ownership Housing, Affordable Rental Housing	HOME: \$3,007,129	Affordable housing units added: 25 units
8	Affordable Homeownership Housing	2020	2020	Affordable Housing	STATEWIDE	Affordable Ownership Housing	HOME: \$5,011,881	Affordable housing units added: 130 units
9	Affordable Rental Housing	2020	2020	Affordable Housing	STATEWIDE	Affordable Rental Housing	HOME: \$12,028,515	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted. Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted
10	Affordable Rental Housing for Extremely Low Income	2020	2020	Affordable Housing	STATEWIDE	Affordable Rental Housing	Housing Trust Fund: \$14,371,181	Rental units constructed: 50 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Housing and Supportive Services	2020	2020	Affordable Housing Non-Homeless Special Needs	STATEWIDE	STRMU Payments; Permanent Housing Placement Assistance; TBRA; Resource identification services; Housing information services; Case management and other supportive services; Short-term supported housing; Facility-based housing development and preservation; Facility-based housing operations activities; Transitional housing; Administrative services	HOPWA: \$8,049,041	Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted Homelessness Prevention: 1,200 Persons Assisted
12	Disaster Recovery	2020	2020	Disaster Recovery	STATEWIDE	Disaster Recovery	CDBG-DR: \$54,458,405	Other: TBD
13	Coronavirus Response and Recovery	2020	2020	Non-Housing Community Development	STATEWIDE	Coronavirus Response and Recovery	ESG-CV2: \$65,511,297 CDBG-CV: TBD	Tenant-based rental assistance/ Rapid Rehousing (Households Assisted): TBD Homelessness Prevention: TBD Homeless Person Overnight Shelter (Persons Assisted): TBD Housing for Homeless: TBD Street Outreach to unsheltered individuals/families: TBD Other: TBD

Table58 – Goals Summary

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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.
<b>2</b>	<b>Goal Name</b>	Commercial Revitalization
	<b>Goal Description</b>	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.
<b>3</b>	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	The primary objectives of the Housing Rehabilitation category are to improve housing conditions for low- and moderate-income persons.
<b>4</b>	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	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	<b>Goal Name</b>	Emergency Shelter and Street Outreach
	<b>Goal Description</b>	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	<b>Goal Name</b>	Permanent Housing for Homeless Persons
	<b>Goal Description</b>	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	<b>Goal Name</b>	Rental and Homeownership Activities (CHDOs)
	<b>Goal Description</b>	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	<b>Goal Name</b>	Affordable Homeownership Housing
	<b>Goal Description</b>	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	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	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	<b>Goal Name</b>	Affordable Rental Housing for Extremely Low Income
	<b>Goal Description</b>	The NHTF Program, administered by FHFC, funds affordable rental housing for extremely low income (ELI) 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	<b>Goal Name</b>	Housing and Supportive Services
	<b>Goal Description</b>	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.
12	<b>Goal Name</b>	Disaster Recovery
	<b>Goal Description</b>	Community development related to disaster recovery through the CDBG-DR program.
13	<b>Goal Name</b>	Coronavirus Response and Recovery
	<b>Goal Description</b>	Responding to the housing and community development needs stemming from the COVID-19 pandemic and providing funds for coronavirus response in homeless assistance and prevention services.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

FHFC plans to provide down payment assistance for 130 new affordable housing units for low- and moderate-income households with an income of less than 80 percent AMI. FHFC plans to provide construction funds for the production of 175 rental units with either HOME (125 units for low and income households with an income of less than 60 percent AMI) or NHTF funds (50 units for ELI income households with an income of less than 30 percent AMI). FHFC plans to provide rental assistance to 50 low-income households with an income of less than 60 percent AMI.

Additional affordable housing services and opportunities for extremely low-, low-income eligible beneficiaries funded through the HTF, ESG, and HOPWA programs are not included above.

**AP-25 Allocation Priorities – 91.320(d)**

**Introduction:**

The following chart reflects the planned percentage distribution of the FFY 2020 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**

	Economic Development	Commercial Revitalization	Housing Rehabilitation	Neighborhood Revitalization	Street Outreach	Emergency Shelter	Permanent Housing for Homeless Persons	Rental and Homeownership Activities (CHDOs)	Affordable Homeownership Housing	Affordable Rental Housing	Affordable Rental Housing for Extremely Low Income	Housing and Supportive Services	Coronavirus Response and Recovery	Disaster Recovery	Total (%)
CDBG	30%	5%	25%	35%									5%		100%
HOME								15%	25%	60%					100%
HOPWA						10%						90%			100%
ESG						60%	40%								100%
NHTF											100%				100%
CDBG-DR														100%	100%
CDBG-CV													100%		100%
ESG-CV													100%		

**Table 59 – 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 recover 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) 2020 allocation:

1. Creating economic opportunities;
2. Creating a suitable living environment; and
3. Providing affordable 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 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 2020 allocation:

1. Increase street outreach to homeless persons (especially unsheltered),
2. Increase availability of emergency shelters 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 2020 allocation:

1. Increase rental housing availability through CHDOs for households 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 2020 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 2020 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 2020 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 60 - Distribution Methods by State Program

<b>1</b>	<b>State Program Name:</b>	<b>Florida Emergency Solutions Grant Program</b>
	<b>Funding Sources:</b>	ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	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. 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.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable to ESG.</p>
<p><b>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)</b></p>	<p>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 will sub-grant the ESG funds to local continuum of care lead agencies to carry-out activities consistent in their CoC plans. Lead agencies may sub-contract with units of general-purpose local government and/or nonprofit organizations to provide direct service to eligible beneficiaries meeting the “homeless” definition in 24 CFR § 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR § 576.104. Local governments can establish additional eligibility criteria for program beneficiaries in accordance with 24 CFR § 576.400(e).</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable to ESG.</p>

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>The ESG Program will receive a total allocation of \$5,911,591 in funding for federal fiscal year 2020. 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><b>Describe threshold factors and grant size limits.</b></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><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The anticipated outcome measures for the ESG Program are based on how many eligible homeless service providers and shelters receive funding assistance, how many homeless persons benefit from emergency shelter assistance, how many homeless persons received permanent housing, how many people are kept in their existing housing and how many people are still stably housed in incremental months after receiving assistance.</p>
<p><b>2</b></p>	<p><b>State Program Name:</b> <b>Florida HOME Investment Partnership Program</b></p> <p><b>Funding Sources:</b> HOME</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></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><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable to HOME.</p>
<p><b>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)</b></p>	<p>Not applicable to HOME.</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable to HOME.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>The HOME Program will receive a total allocation of \$20,047,525 in funding for FY 2020. 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><b>Describe threshold factors and grant size limits.</b></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><b>What are the outcome measures expected as a result of the method of distribution?</b></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 2020, 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>

<b>3</b>	<b>State Program Name:</b>	<b>Florida Housing Opportunities for Persons With AIDS (HOPWA) Grant Program</b>
	<b>Funding Sources:</b>	HOPWA
	<b>Describe the state program addressed by the Method of Distribution.</b>	<p>The HOPWA Program may receive a total allocation \$8,049,041 in funding for fiscal year 2020. 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 EMSAs administered by the state. The remaining 15 counties are served by six EMSAs that receive funding directly from HUD.</p>
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	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.
	<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable to HOPWA.

<p><b>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)</b></p>	<p>Not applicable to HOPWA.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>A minimum of 97% of the state HOPWA grant award will be allocated statewide to project sponsors to carry out 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 program currently has one faith-based organizations, four community-based organizations, three county health departments, and two planning councils as HOPWA project sponsors providing services either directly or via sub-contract.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Florida distributes funds annually based on the cumulative number of persons living with HIV or AIDS cases in the geographical service areas through December 31. 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. 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>

	<b>Describe threshold factors and grant size limits.</b>	The 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 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.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	The anticipated outcome measures for the HOPWA Program are based on the number of persons with HIV/AIDS that receive financial assistance from eligible 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 HOPWA Program goals and priorities.
4	<b>State Program Name:</b>	<b>Florida Small Cities Community Development Block Grant Program</b>
	<b>Funding Sources:</b>	CDBG

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>DEO receives an annual allocation from HUD to administer the 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, including for FFY 2020 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. This distribution is incorporated into the annual action plan prior to the public hearing on the action plan.</p> <p>Deobligated funds and program income funds sometimes become available during the federal fiscal year. If emergency set-aside funds become available on the first of April because there has been no state declared disaster or when deobligated and 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><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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 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"> <li>1. The application is not received by the specified deadline date;</li> <li>2. The proposed project activities fail to meet one of the three national objectives contained in federal and state legislation;</li> <li>3. The proposed activities are not eligible under federal legislation;</li> <li>4. The proposed activities are not in compliance with the adopted local comprehensive plan, as approved by DEO;</li> <li>5. The applicant has an open CDBG, except as provided in § 290.046(2)(b) and (c), F.S. and department rules;</li> <li>6. The local government is not in compliance with citizen participation requirements; and</li> <li>7. Information provided in the application that affects eligibility or scoring is misrepresented.</li> </ol>
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	<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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></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 <a href="http://www.floridajobs.org/CDBGApplicantInfo">http://www.floridajobs.org/CDBGApplicantInfo</a>. 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><b>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)</b></p>	<p>Not applicable to CDBG.</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable to CDBG.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Funding amounts are assigned to each funding category based on a need evaluation. For the FFY 2019 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><b>Describe threshold factors and grant size limits.</b></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><b>LMI Population Subgrant Ceiling</b></p> <ul style="list-style-type: none"> <li>• 1 – 499: \$600,000</li> <li>• 500 – 1,249: \$650,000</li> <li>• 1,250 – 3,999: \$700,000</li> <li>• 4,000 – and above: \$750,000</li> </ul> <p>Economic Development subgrants: \$1,500,000.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	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	<b>State Program Name:</b>	<b>National Housing Trust Fund Program</b>
	<b>Funding Sources:</b>	Housing Trust Fund
	<b>Describe the state program addressed by the Method of Distribution.</b>	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 households. FHFC will allocate HTF funds through a competitive RFA process directly to eligible recipients.

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The criteria listed below have all been deemed of equal relative importance. If an applicant does not meet the following criteria, they will not receive funding.</p> <ul style="list-style-type: none"> <li>• The development must be permanent rental housing and each NHTF-designated unit may have no more than two bedrooms;</li> <li>• The NHTF-designated units must remain affordable to extremely 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;</li> <li>• 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;</li> <li>• The applicant must show via its developer experience its ability to obligate NHTF funds and undertake eligible activities in a timely manner;</li> <li>• A description of the eligible activities to be conducted with the NHTF funds;</li> <li>• Extent to which the application makes use of non-federal funding sources;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul>
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	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Meet specified green building and accessibility standards;</li> <li>• Propose developments in locations that are proximate to public transportation options and amenities such as grocery stores and pharmacies; and</li> <li>• Accept the Tenant Application and Selection Requirements designed to lower barriers to entry for extremely low-income households.</li> </ul>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Not applicable to NHTF.</p>
<p><b>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)</b></p>	<p>Not applicable to NHTF.</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable to NHTF.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Ninety percent of the NHTF allocation will be used to finance affordable rental units for extremely low-income households, and 10 percent of the allocation will be used by FHFC for administrative costs pursuant to § 93.202.</p>
<p><b>Describe threshold factors and grant size limits.</b></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>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>In 2020, it is expected that the NHTF program will assist in financing construction of 50 affordable rental units to serve extremely low-income residents.</p>

## **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 bases allocation distribution methods on a competitive grant application scored based on eligible activities to persons meeting the definition of homeless, or in imminent danger of becoming homeless and the capacity to carry-out these activities.
- 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 competitive 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 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
	n/a – not applicable to states

**Table 34 – 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**

N/A; not applicable to state plans.

## **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 (or may not) 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 limited to \$5 million.

### **Acceptance process of applications**

The Section 108 loan guarantee application, review and approval process is outlined in rule 73C-23.0071, Florida Administrative Code. This rule is provided below:

#### (1) Eligibility.

- (a) Municipalities and counties on 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 department for review.
  - 2. Following the department'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 the department. 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 a 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-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 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. 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 the local communities 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 "homeless" definition in 24 CFR 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR 576.104. Local governments have the freedom to 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 Continuum of Care Consortium(s) operating within their jurisdiction before determining how ESG funds are allocated.

**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 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 a competitive 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 currently contracts with project sponsors to administer the State HOPWA Program in a designated geographic area, 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 EMSAs administered by the state.

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

- Lutheran Services Florida, Inc., Northwest (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)
- Florida Department of Health-Polk (Highlands, Hardee, and Polk Counties)
- Florida Department of Health-St. Lucie (Indian River, Martin, Okeechobee, and St. Lucie Counties)

**Geographic Distribution**

Target Area	Percentage of Funds
STATEWIDE	100

Table 62 - 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.

## 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 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, ESG and HOPWA 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 residents.

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

Table 64 - One Year Goals for Affordable Housing by Support Requirement

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

Table 65 - 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 and homeless prevention and rapid re-housing for homeless persons throughout Florida. Each of the funding categories has 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:**

#### **1. 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 successful in their particular jurisdiction. The most implemented outreach assessment strategy is the point-in-time (PIT) counts. PIT counts can be carried out in two ways: the survey method and the in-person interview method. For the survey method, the CoC lead agency will collect data from shelter service providers through the Homeless Management Information System regarding the number of sheltered homeless individuals on a specific night. For the in-person interview method, the CoC lead agency will employ surveyors to go out into the public to interview unsheltered homeless persons to collect data on the numbers and reasons for homelessness on a specific night.

#### **2. Addressing the emergency shelter and transitional housing needs of homeless persons**

The state will allocate up to 60 percent of the annual grant award to the emergency shelter component, which may be used to fund local providers of emergency housing. CoC lead agencies will carry-out homeless services programs through collaboration and planning with local service providers in 2020.

Other transitional housing projects will be up for renewal grants in the CoC Notice of Funding Availability (NOFA) for 2020. Such housing units are critical to the homeless service plans, as the 13,540 transitional

housing beds make up over one-third of the available homeless housing units in Florida.

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.

**3. 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 CoC agencies and their homeless service providers to provide the numbers and reasons for their respective jurisdiction's homeless population in relation to determining housing needs of homeless persons. To address the emergency and transitional housing 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. Other programs can include 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, but are able to do so 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 supportive services

providers such as CoC agencies and other providers serving homeless persons.

**4. 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)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	960
Tenant-based rental assistance	164
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	95
<b>Total</b>	<b>1,219</b>

## **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.

In addition, the state will increase housing choice through its actions to affirmatively further fair housing choice including:

- Publishing fair housing resource materials on agency websites in different languages;
- Coordinating with the Florida Commission on Human Relations in conducting annual workshops on fair housing; and
- Requiring grant recipients to conduct quarterly fair housing activities.

**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 a local public hearing 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. The CoC lead agencies have the option, when available, to supplement additional HUD program funding, such as the Shelter Plus Care Program, for the added benefit of achieving homeless housing goals and objectives.

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.

The HOME Program provides program funding to produce and rehabilitate housing units for affordable homeownership and rental housing opportunities for low- and moderate-income beneficiaries for 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 households in Florida.

The goal of the HOPWA Program is to increase housing stability and improve the quality of life for clients and their families. The 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 measure 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.

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

### Introduction:

The CDBG Program anticipates receiving \$72,500 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.

In the past three years, emergency set-aside funds have been awarded in response to state-declared emergencies, but the activities funded still benefitted LMI residents. The estimated percentage of CDBG funds that will be used for activities that benefit low- and moderate-income persons is 70 percent. There are no overall benefit projects anticipated.

### 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	68,162
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
<b>Total Program Income</b>	<b>68,162</b>

### 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. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	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 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.

**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 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 the 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.**

The following performance measures are proposed to be used jointly by DCF and the CoC planning lead agency to assess the performance of DCF's funded recipients under the 2020 ESG. Subrecipients will be required to provide copies of DCF required reports to the lead agency at the same time the report is due to DCF.

### 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. At least 35 percent of the participants served 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 only 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”.

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.

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”.

The state of Florida will distribute NHTF funds by selecting applications submitted by eligible recipients on a competitive basis through FHFC’s RFA process. Funds will be made available in tandem with other financing to ensure geographic diversity, through an existing process that: proportionally aligns SAIL and Low-Income Housing Tax Credit funding with affordable rental needs in the state based on the most recent cost burden data provided through triennial market needs studies carried out by the Shimberg Center for Housing Studies at the University of Florida. Program funding is proportionally distributed across large, medium and small counties based on these findings. Florida is commonly divided into three broad regions: north, central and south. Three of the seven large counties are located in South Florida, three are located in Central Florida and one is located in North Florida. Medium and small counties are located in all three regions with North Florida having the greatest number of small counties; and within large, medium and small county groupings, Florida 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.

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 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 extremely low-income 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 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".

The NHTF-designated units must remain affordable to extremely low-income households through a Land Use Restriction Agreement for no less than 30 years. FHFC will not incentivize a longer affordability period for these units at the 22 percent of area median income level, but will require the units to remain affordable at or below 60 percent of area median income after the first 30 years for an additional 20-year period. After 30 years, the property will require rehabilitation, but because of the limitations on operating income even from the 60 percent of area median income units, recapitalization will be difficult without financing from FHFC and/or the private sector, which may require more flexible approach to the income levels served. Any units in the development with affordability restrictions must remain affordable at 60 percent of area median income levels for 50 years. FHFC's approach to providing refinancing to older properties is to require additional units to be set aside to serve extremely low-income tenants; thus, while we cannot know the economic and real estate markets and programs in 30 years, under today's approach these properties would be targeted with refinancing to maintain affordability for extremely low-income tenants.

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 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:**

**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**

<b>Maximum Subsidy Limits for 0-1 Bedroom Units – New Construction Only</b>			
<b>Construction Type</b>	<b>Miami-Dade, Broward, Palm Beach Counties</b>	<b>Monroe County</b>	<b>Remainder of Florida</b>
Garden – Wood	N/A	N/A	\$185,500
Garden – Concrete	\$239,300	\$336,800	\$218,000
Mid-Rise – Wood	N/A	N/A	\$218,000
Mid-Rise – Concrete	\$260,300	\$367,300	\$237,800
High-Rise	\$309,200	N/A	\$284,000

<b>Maximum Subsidy Limits for 2 Bedroom Units – New Construction Only</b>			
<b>Construction Type</b>	<b>Miami-Dade, Broward, Palm Beach Counties</b>	<b>Monroe County</b>	<b>Remainder of Florida</b>
Garden – Wood	N/A	N/A	\$213,800
Garden – Concrete	\$275,400	\$389,200	\$252,000
Mid-Rise – Wood	N/A	N/A	\$252,000
Mid-Rise – Concrete	\$300,000	\$425,100	\$275,300
High-Rise	\$357,600	N/A	\$329,700
Add this factor to the all above limits if a development is subject to the requirements of the Davis-Bacon Act			\$5,000

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

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.