



Palm Beach County  
Board of County Commissioners



# FY 2022-2023 Action Plan







**PALM BEACH COUNTY  
FY 2022-2023 ACTION PLAN**

**Palm Beach County  
Board of County Commissioners**

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## Executive Summary

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

#### 1. Introduction

Per HUD regulations governing Consolidated Submissions for Community Planning and Development Programs (24 CFR Part 91.15 (a)(2)), an entitlement jurisdiction whose fiscal year commences in October must submit an Action Plan to HUD by August 16 of each year. For FY 2022-2023, HUD published the following formula grant awards for Palm Beach County: Community Development Block Grant (CDBG) - \$6,492,406; HOME Investment Partnership (HOME) - \$2,703,963; and Emergency Solutions Grant (ESG) - \$577,734. The Action Plan serves as the County's application to HUD to receive these funds and details how the funds will be used to address the goals and objectives outlined in the County's FY 2020-2024 Consolidated Plan. The Palm Beach County Urban County Program Jurisdiction comprises all areas of unincorporated Palm Beach County as well as 31 municipalities that have signed inter-local agreements with the County. The Department of Housing and Economic Development (DHED) is the lead agency responsible for the consolidated planning process. The development of the Action Plan involves DHED collaborating with the 31 municipalities, other county departments, service providers, private industry, advocacy groups, general public, and other interested parties. These collaborative efforts shaped the various housing, community development, economic development and public services strategies which are detailed in the Action Plan.

#### 2. Summarize the objectives and outcomes identified in the Plan

The objectives and outcomes to be realized from the use of CDBG, HOME and ESG funds identified in the FY 2022–2023 Action Plan are identified on the chart below.

Goal Name	Objective	Needs Addressed	Goal Outcome Indicator
Affordable Rental Housing	Affordable Housing	Affordable Rental Housing	Rental Units Constructed: 589 units Rental Assistance: 112 units
Affordable Homeownership	Decent, Affordable Housing	Homeownership	Homeowner Housing Constructed: 14 units Homeowner Rehabilitation: 60 units Direct Financial Assistance to Homebuyers: 60 units Mortgage Assistance: 27 units
Public Services	Suitable Living Environment	Provision of Public Services	Public service activities other than Low/Moderate Income Housing Benefit: 659 persons assisted

Goal Name	Objective	Needs Addressed	Goal Outcome Indicator
Special Needs Services	Suitable Living Environment	Provision of Public Services	Public service activities other than Low/Moderate Income Housing Benefit: 174 persons assisted
Homelessness	Decent, Affordable Housing	Homeless Assistance	Public service activities other than Low/Moderate Income Housing Benefit: 1,367 persons assisted Tenant-based rental assistance/ Rapid Re-housing: 112 households assisted
Public Facilities and Infrastructure	Suitable Living Environment	Public Facilities and Infrastructure	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 77,509 persons
Code Enforcement	Suitable Living Environment	Code Enforcement	Other: contribute to sustaining communities with an estimated 35,000 persons.
Economic Development	Economic Opportunities	Economic Development	Jobs created/retained: 198 Jobs Businesses Assisted: 1,352 businesses

### 3. Evaluation of past performance

The current fiscal year began on October 1, 2021, and therefore had only completed eight months when the draft FY 2022-2023 Action Plan was completed. Accomplishments for FY 2021-2022 will be reported in the Consolidated Annual Performance and Evaluation Report published in December 2022. The chart below shows the extent to which the County achieved the targets set forth in the prior year Action Plan. The review shows the accomplishments achieved under the following categories: Housing, Economic Development, Capital Improvements, Homeless, Special Needs Services and Public Services.

Category		Unit	FY 2020-2021		Percent Realized
			Target	Actual	
Housing	Homeowner Housing Added	Households	28	65	232%
	Homeowner Housing Rehabilitated	Households	0	233	--
	Mortgage Assistance	Households	0	1,026	--
	Rental Units Constructed	Units	882	623	70%
	Rental Assistance	Households	448	9,640	2,151%
	Total Housing	Households	2,674	11,587	433%



Category		Unit	FY 2020-2021		Percent Realized
			Target	Actual	
Economic Development	Economic Development Services	FTE Jobs	15	302	2,013%
	Economic Development Assistance	FTE Jobs	21	27	128%
	Total Economic Development (Jobs)	FTE Jobs	36	329	913%
	Economic Development Services	Businesses	0	5,204	--
	Economic Development Assistance	Businesses	102	277	271%
	Total Economic Development (Businesses)	Businesses	102	5,481	5,373%
Capital Improvements	Infrastructure	Persons	21,970	29,200	132%
	Public Facilities	Persons	29,905	27,055	90%
	Total Capital Improvements	Persons	51,875	56,255	108%
Homeless	Prevention	Persons	121	61	50%
	Services	Persons	3,950	2,410	61%
	Total Homeless		4,071	2,471	60%
Special Needs	Housing	Households	0	0	--
	Services	Persons	213	472	221%
Public Services	General	Persons	569	868	152%

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

A total of five (5) public meetings were held by Palm Beach County as part of its Action Plan public participation process. On February 22, 2022, DHED staff held an in-person/virtual meeting to advise the public of the strategies used to distribute funding under the CDBG, HOME and ESG Programs. Participants were provided with the opportunity during and after the meeting to provide input on the use of the funds during the upcoming fiscal year.

On April 26, 2022, DHED staff presented the Action Plan funding strategies to the Board of County Commissioners (BCC) at a public workshop for discussion and final direction.

On May 20, 2022, the Non-Conflict Grant Review Committee met to review Emergency Solution Grant (ESG) applications submitted via a Request for Proposals (RFP) published on April 8, 2022

and to make funding recommendations on the applications. The meeting was posted on the Department of Community Services website and on social media.

On June 22, 2022, an in-person/virtual meeting was held in West Palm Beach to present the draft Action Plan to the public and to gather input as part of the citizen participation process. Attendees were advised that comments could be submitted to [hedcomments@pbcgov.org](mailto:hedcomments@pbcgov.org) until the date of the BCC meeting.

On July 12, 2022, the Action Plan was presented to the BCC for approval at a public meeting. All public meetings noted above were advertised in the Palm Beach Post Newspaper, posted on the DHED website at <http://www.pbcgov.com/hed>, and blasted, via email to interested parties and municipalities.

As part of the citizen participation process, DHED solicited public input from interested groups by making presentations and providing information to the following groups: The Affordable Housing Collaborative, the Housing and Homeless Alliance, the Housing Leadership Council, the Countywide Community Revitalization Team, and the Special Needs Advisory Coalition.

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

Below is a summary of all public comments received either directly at the meetings or in written format:

### February 22, 2022 – In-Person and Virtual Public Meeting

No public comments were received at this meeting

### April 26, 2022 – Palm Beach County Board of County Commissioners Workshop

Members of the BCC commented on the need for more affordable housing in Palm Beach County.

### May 20, 2022 – Non-Conflict Grant Review Committee Meeting

No public comments were received at this meeting.

### June 22, 2022 – In-Person and Virtual Public Meeting

No public comments were received at this meeting

### July 12, 2022 – BCC Public Meeting

Member of the BCC commented on need to consider housing for senior citizens.



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

All comments received from the public, were accepted and incorporated into the Action Plan where applicable.

**7. Summary**

The FY 2022-2023 Action Plan addresses eight (8) of the goals identified in the FY 2020–2024 Five Year Consolidated Plan. The goals addressed are: Affordable Rental Housing, Affordable Homeownership, Public Services, Special Needs Services, Homelessness, Public Facilities and Infrastructure, Code Enforcement, and Economic Development. The citizen participation process garnered public input that helped shape the funding strategies and activities that are included in the final Action Plan.

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

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

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG	Palm Beach County	Housing and Economic Development
HOME	Palm Beach County	Housing and Economic Development
ESG	Palm Beach County	Community Services

### **Narrative**

The Department of Housing and Economic Development (DHED) is the agency responsible for preparing the FY 2022-2023 Action Plan. The Department of Community Services, Division of Human and Veteran Services (DHVS) administers the ESG Program and prepares those sections of the Action Plan related to the ESG Program. DHED administers federal funds provided to the County under the formula-based CDBG and HOME Programs. All activities related to insertion of data into IDIS is the responsibility of DHED.

### **Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Palm Beach County is dedicated to obtaining input from citizens, municipal officials, public and private agencies, private developers, governmental agencies, stakeholders and other interested parties as part of the Consolidated Plan and Action Plan processes. Citizen participation is strongly encouraged throughout the planning process. For the FY 2022-2023 Action Plan consultation included a combination of virtual and in person meetings with county partners, including non-profits subrecipients and municipalities. Specifically, information was disseminated and input sought through community meetings, meetings with the Board of County Commissioners (BCC), newspaper advertisements, web announcements, and public meetings. One public meeting was held solely for the purpose of obtaining community input on the draft of the FY 2022-23 Action Plan. Approval of the Action Plan was requested and received at a BCC Public Hearing on July 12, 2022.

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

Palm Beach County (PBC) coordinates with public and private housing providers and developers to promote the production and availability of affordable housing units. The County is an active participant in the Housing Leadership Council and the Affordable Housing Collaborative. The County also coordinates the Commission on Affordable Housing (CAH) Advisory Board. The CAH is a local housing advisory committee appointed by the Board of County Commissioners and required by Florida Statute as a condition to participating in certain State affordable housing programs. PBC will continue to utilize SHIP and HOME funding for the development of affordable housing. DHED coordinates with other County Departments, community partners, and various housing providers to revise existing County's policies and create new policies as they relate to the provision of affordable and workforce housing for county residents.

DHED has in the past provided funding to the two public housing authorities within its jurisdiction to assist with the upgrading, increasing and maintaining of their housing stock. HED has also supported these two entities in applying for grant funding to carry out their mission. Coordination between the County and the public housing providers is heightened by the requirement for Housing Authorities to obtain a determination from the County ensuring their annual plans and strategies are consistent with the goals of the County's Consolidated Plan.

DHED collaborates with Florida Health Palm Beach County to ensure that guidelines for lead reductions are consistent with homebuyer regulations, rehabilitation program regulations, and local building codes. As structures built prior to 1978 are identified, they are tested for lead-

based paint (LBP). Test results are communicated to Florida Health and all LBP inspections and abatement test results are kept on file by DHED.

The County coordinates with many social service agencies and mental health providers to ensure activities funded under local, state and federal programs conform to program guidelines and produce positive outcomes. DHED provides funding to two (2) agencies that provide services to the mental and physically disabled populations.

Palm Beach County has inter-local agreements with 31 municipalities through the Urban County Qualification Program. Of these, 10 municipalities have CDBG target areas. Over the course of the Action Plan preparation process, the County consults with all municipalities to identify community needs and potential uses of funding. In some instances, municipalities directly implement activities, and in others, the County implements activities on behalf of or in coordination with municipalities.

**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.**

Palm Beach County's Continuum of Care (CoC) is known as the Homeless and Housing Alliance (HHA). The HHA is a community-based organization whose mission is to plan for and manage homeless assistance resources and programs effectively and efficiently in order to end homelessness in Palm Beach County. The HHA aligns all activities and decisions with *Leading The Way Home Palm Beach County*, the County's adopted plan to end homelessness in Palm Beach County. The HHA is a nonsectarian and nonpartisan organization whose membership includes interested citizens, formerly homeless persons, non-profit organizations, service providers, law enforcement, and faith based agencies, governmental entities, educational organizations and various civic groups. The HHA has task groups, which have various roles and responsibilities. These committees include Race and Equity, Healthcare, Permanent Housing, Support Services, Systems, Engagement and Advocacy and HMIS. The County's Division of Human and Veteran Services (DHVS) serves as the Lead Agency for the HHA.

DHVS, in coordination with the HHA, prepares the HUD funding application for the Continuum of Care annual grant. Typically, this grant totals approximately \$4.5 million and is awarded to approximately 15 non-profit agencies that provide permanent supportive housing and rapid rehousing services within the County. Homeless individuals and families as well as victims of domestic abuse and unaccompanied youth are the primarily beneficiaries of these housing services.

The application for funding under the state funded Challenge Grant Program is jointly prepared by the HHA and PBC Department of Community Services (CSD). The County's homeless prevention activities are funded through this program and through the Emergency Food and Shelter (EFS) Program. The EFS program funding is provided to the County by FEMA via the United Way. The Challenge Grant is administered by non-profit agencies and CSD administers the EFS Program.

Palm Beach County Sheriff's Office in coordination with the County's Homeless Resource Center and the HHA has developed a discharge process that permits individuals who were homeless prior to incarceration to participate in the HHA's Homeless Service Programs. Prior to being released, the County's Outreach Team meets with the inmate and coordinates with community partners to arrange for shelter and support services.

The County's Offender Reentry Initiative is a coordinated effort of the County's Public Safety Department, the County's Criminal Justice Commission, and Gulfstream Goodwill Industries. The reentry services offered include case management, medical management, housing assistance, and peer support. Employment services are provided via referrals to community partners.

The HHA will continue to coordinate with the Department of Children and Families (DCF), ChildNet, and applicable service providers to establish a method for the discharge of youth aging out of foster care. The method will facilitate transition from the foster care system to self-sufficiency for unaccompanied youth ages 18 to 25. At present, three facilities within PBC provide shelter and support services for this population.

The HHA continues to work with the Homeless Resource Centers to develop plans for the discharge of patients from health and mental institutions. The County is also exploring the establishment of an emergency respite housing facility for this population.

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

The HHA Executive Committee prioritizes the eligible ESG components and provides direction as to how the ESG award should be allocated for each upcoming program year. The Executive Committee's recommended priorities and distribution method are brought before the entire HHA for final approval. Once the priorities and the distribution method are approved, the following actions are conducted by DHVS:

- A Request for Proposals (RFP) and a scoring tool is developed and an appeal process is established.
- The RFP is issued and posted on the County's and HHA's website.
- A Technical Assistance Meeting is conducted for all interested applicants.
- A Non-Conflict Grant Review Committee with one member being either homeless or formerly homeless is established by DHVS.
- Proposals are initially reviewed by DHVS to insure regulation compliance, and then forwarded for review and scoring by the Grant Review Committee.
- The Grant Review Committee scores and ranks the proposals at a public meeting and makes ESG funding recommendations based on the scoring/ranking.
- The proposed ESG funding recommendations are brought before the full HHA committee for ratification.
- The ESG funding recommendations are forwarded to the Board of County Commissioners (BCC) for final approval.

The ESG performance standards were developed from the process the HHA utilizes to review and rank the CoC renewal applications. All applicants must have a definable program that serves the homeless and/or persons at risk of homelessness to be awarded ESG funding. All ESG projects must be an eligible activity that meets the HHA priority. The ESG applications for funding are scored on the following performance measures: project narrative, project goals and objectives, site control and compliance with zoning and land use, budget proposal, financial audit, past monitoring, HMIS data completeness and HHA participation. These performance measures are used to evaluate all homeless programs, including ESG funded projects within the Continuum.

Palm Beach County's HMIS is funded by the County, various grants, and by user licensing fees. The HHA has a HMIS Oversight Subcommittee that acts as an advisory group to the HHA Executive Committee. This subcommittee is charged with defining and developing criteria, standards, and parameters for the usage and release of all data collected through HMIS. Enforcing minimum data collection standards, compiling, and analyzing HMIS data are also tasks of this subcommittee. The HMIS Policies and Procedures and the HMIS User Agreements were written by the HMIS Oversight subcommittee and approved by the HHA committee.

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

**Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? (Need for each agency/group/organization)**

Organization	Organization Type	Section of Plan	How consulted / outcome
Commission on Affordable Housing	Housing	Housing Need Assessment	Attended meeting, made announcement, discussed plan, solicited input/comments
Affordable Housing Collaborative	Housing	Housing Need Assessment	Attended virtual meeting, made announcement / discussed Plan, solicited input/comment
Comprehensive Economic Development Strategy Committee	Regional Planning Council	Economic Development Strategy	Attended meeting, made announcement, solicited input/comments
Countywide Community Revitalization Team	Civic Leaders / Business Leaders	Housing Need Assessment / Non-housing Community Development Strategy	Attended virtual meeting, made announcement / discussed Plan, solicited input/comment
PBC Reentry Task Force	Services- Homelessness, Housing	Housing Needs Assessment/Homelessness Strategy	Attended meeting, made announcement, solicited input/comments
PBC Community Services Department	Other government – County	Homeless Needs / Homelessness Strategy / Non-homeless special needs	Various communication (meetings, phone calls, electronic communication) and direct assistance in composition of several Plan sections
Housing Leadership Council	Housing / Civic / Business Leaders	Housing Need Assessment	Attended virtual meeting, made announcement, solicited input/comment
Homeless and Housing Alliance (CoC)	Services - Homelessness	Homeless Needs / Homelessness Strategy	Attended virtual meeting, made announcement, solicited input/comment
Homeless Coalition, of PBC, Inc.	Services-Homelessness	Homeless Needs / Homelessness Strategy	Various communication (meetings, phone calls, electronic communication) provided information for identified Plan sections
Palm Beach County Housing Authority	PHA	Public Housing Needs	Various communication (meetings, phone calls, electronic communication) and provided information for composition of identified Plan sections
Pahokee Housing Authority	PHA	Public Housing Needs	Various communication (meetings, phone calls, electronic communication) and provided information for composition of identified Plan sections
SE Florida Behavior Health Network	Services -Homelessness	Homeless Needs / Mental Health	Via telephone and electronic request for information/ provided information for Plan sections
Palm Beach County Board of County Commissioners	Other Government- County	Housing Needs/Homelessness Strategy/ Economic Development Strategy/Capital Improvements	Attended meeting, delivered presentation, provided written materials and solicited input/comments.

**Brief Description of How Input is Solicited**

DHED made presentations to various organizations regarding the development of the Action Plan as part of the County's planning process. Agencies, municipalities, and County departments were also invited to participate in the development of the Action Plan at a public in person and virtual meeting held on February 22, 2022. Public comments were solicited at all presentations and public meetings. Interested entities received written notification of a Board of County Commissioners (BCC) April 26, 2022 meeting. Notices for the public meetings as well as the BCC meeting were published in the local newspaper, placed on DHED's website and emailed to interested agencies, municipalities, and other County Departments. Notices of all public meetings relating to the Emergency Solutions Grant (ESG) were placed on the Department of Community Services' and the HHA's website.

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

In seeking public input on the formulation of the Action Plan, HED endeavored to include all pertinent agencies and interested parties in the consultation process and has not knowingly excluded any entity from the opportunity to be consulted.

**Describe other local/regional/state/federal planning efforts considered when preparing the Plan**

**SEE TABLE ON NEXT PAGE**



Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Leading the Way Home	Palm Beach County Community Services Department	Drives all County homeless-related goals/priorities including those contained within Consolidated Plan
21st Century Palm Beach County	Palm Beach County Department of Housing and Economic Development	Guides overall economic goals and strategy for county government
Strategic Regional Policy Plan	Treasure Coast Regional Planning Council (TCRPC)	Goals for a livable physical environment and sustainable communities that meet the needs of a diverse population.
Glades Region Master Plan	Palm Beach County Department of Housing and Economic Development	The Glades Region Master Plan serves to provide a framework for economic development and redevelopment in the Glades to attract future infrastructure dollars, thus furthering plan objectives.
Palm Beach County Comprehensive Plan	Palm Beach County Department of Planning, Zoning, and Building	The Comprehensive Plan identifies area where public infrastructure and other community facilities are lacking. The Action Plan seeks to provide funding to these projects after ascertaining that they are eligible to receive funds.

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

As an Urban County, Palm Beach County coordinates with all thirty-one (31) municipalities that participate in the Urban County Program during implementation of the Consolidated Plan. Additionally, the County routinely coordinates with the State of Florida and local entitlement jurisdictions, such as the municipalities of Boca Raton, Boynton Beach, Delray Beach, Jupiter, Palm Beach Gardens, Wellington, and West Palm Beach. Inter-jurisdictional coordination often occurs during collaborative funding participation in housing, community, and economic development projects of mutual interest. The County continues to be the lead administrator of the EPA Brownfield Clean-Up Loan Program and DHED continues to be the responsible entity to oversee the designation of brownfield sites within the unincorporated areas of Palm Beach County. The County also partners with local municipalities in financing affordable housing developments that provide benefits to residents from both the municipalities and from the County's jurisdiction. In addition to actual physical development, there is also cooperation in multi-jurisdictional planning initiatives such as the *Leading the Way Home* countywide plan to end homelessness, and cooperation through participation in bodies such as the Housing Leadership Council and the Affordable Housing Collaborative, both comprised of broad representation from community, business, and industry leaders convened to identify solutions to local affordable housing challenges.

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## **AP-12 Participation – 91.105, 91.200(c)**

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

Palm Beach County's Citizen Participation Plan provides the opportunity for citizens to participate in the development of the consolidated plan, the annual action plan, any amendments to the annual plan, and performance reports. Citizen participation is solicited via one or a combination of the following: public meetings, newspaper advertisements, website postings and direct notifications. Palm Beach County encourages the participation of all its citizens, including minorities and non-English speaking persons as well as persons with disabilities. In the case of public meetings upon request prior to the meeting, the County will make available bilingual translators for the non-English speaking residents. All printed documentation incorporates a statement which informs interested parties that said documents can be made available in an alternate format. Furthermore, Palm Beach County complies with the Americans with Disabilities Act (ADA) requirements as it relates to public meetings and related activities. Each public notice includes language which informs the reader the County can make accommodations for persons with disabilities with a three (3) day notice.

The first meeting was held in-person and virtually on February 22, 2022 to discuss the CDBG, ESG, and HOME Programs and to generate public involvement in the planning development process. DHED staff informed the public of this meeting by publishing a notice in the Palm Beach Post on February 13, 2022, posting the notice on the DHED website, and transmitting the notice to municipalities and interested agencies via email. A notice was placed in the Palm Beach Post on April 10, 2022 to advise the public about a workshop to be held on April 26, 2022 before the Palm Beach County Board of County Commissioners (BCC) to present funding strategies on the CDBG, ESG and HOME Programs and to receive direction from the BCC on those strategies. The Draft Action Plan was made available to the public for review via a public notice published in the Palm Beach Post on June 12, 2022, posted to the DHED website, and transmitted via email to municipalities and interested parties. The notice also advised the public of a virtual and in-person meeting that was held on June 22, 2022 to present the specific funding recommendations under the FY 2022-2023 Action Plan before the final plan went before the BCC on July 12, 2022 for approval. The notice also provided for a 30-day comment period. In addition to the public meetings listed above, DHED met with the following groups to advise of the Action Plan process and to solicit their input in developing strategies to be included:

- Housing Leadership Council
- Affordable Housing Collaborative
- Countywide Community Revitalization Team
- Homeless and Housing Alliance

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Public Meeting	Non-targeted/ broad community	On February 22, 2022, DHED held a virtual and in-person meeting. The meeting was attended by representatives of non-profit agencies, municipalities, County departments and other interested parties to receive input on the proposed Action Plan	No comments were received	No comments were received.	<a href="http://www.pbcgov.com/hed">www.pbcgov.com/hed</a>
Public Meeting	Non-targeted/ broad community	On April 26, 2022 DHED sought Board direction on funding strategies for the Annual Action Plan as outlined by HES at the BCC workshop.	There is a need for additional affordable housing within the county.	All comments were accepted at the BCC workshop.	<a href="http://www.pbcgov.com/hed">www.pbcgov.com/hed</a>
Public Meeting	Non-targeted/ broad community	On May 20, 2022, the Non Conflict Grant Review Committee, whose sole purpose is to review the applications for ESG funding, met in a public meeting to review and rank the 6 applications received and to make funding recommendations. .	No comments were received at the public meeting.	No comments were received at the meeting.	<a href="http://www.pbcgov.com/communityservices">www.pbcgov.com/communityservices</a>
Public Meeting	Non-targeted/ broad community	On June 22, 2022, DHED held a virtual and in-person meeting. The meeting was attended by representatives of non-profit agencies, municipalities, County departments and other interested parties to receive input on the proposed Action Plan.	No comments were received at the public meeting.	No comments were received at the meeting.	<a href="http://www.pbcgov.com/hed">www.pbcgov.com/hed</a>
Public Meeting	Non-targeted/ broad community	On July 12, 2022, DHED presented the Action Plan to the Board of County Commissioners for approval	Consider the need for senior citizen affordable housing	All comments were accepted at the BCC meeting.	<a href="http://www.pbcgov.com/hed">www.pbcgov.com/hed</a>

## **Expected Resources**

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

#### **Introduction**

Entitlement grant resources totaling \$22,777,225 are expected to be available during Fiscal Year 2022-2023 (October 1, 2022 – September 30, 2023). The amount received will be targeted on identified priority needs to realize specific goals and objectives outlined in the Consolidated Plan. The grant resources will address obstacles that meet underserved needs, achieve decent housing, expand economic development opportunities for low and moderate-income persons, develop institutional structures, and enhance coordination between public and private housing and social service agencies. The results of these activities will be reported in the Consolidated Annual Performance Evaluation Report to be published in December 2023.

**Expected Resources – Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
<b>CDBG</b>	Public-Federal	Acquisition and Administration and Planning Economic Development Housing Public Improvements Public Services Code Enforcement	\$6,492,406	\$75,000	\$4,494,663	\$11,062,069	\$15,093,198	The CDBG entitlement allocation from HUD for FY 2022-2023 is \$6,492,406. Program income is calculated at \$75,000 for a total available amount of \$6,567,406.
<b>HOME</b>	Public-Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$2,703,963	\$350,000	\$7,927,735	\$10,981,698	\$6,215,104	The HOME entitlement allocation from HUD for FY 2022-2023 is \$2,703,963. Program income is calculated at \$350,000 for a total available amount of \$3,053,963.
<b>ESG</b>	Public-Federal	Overnight shelter Rapid re-housing (rental assistance) Transitional housing	\$577,734	\$0	\$155,724	\$733,458	\$1,253,636	The ESG Program entitlement allocation from HUD for FY 2022-2023 is \$577,734.
<b>TOTAL</b>			<b>\$9,774,103</b>	<b>\$425,000</b>	<b>\$12,578,122</b>	<b>\$22,777,225</b>	<b>\$22,561,938</b>	



### Other Funding Resources (Leveraged)

Program	Source	Uses of Funds	Expected Amount (FY 2022-2023)
Brownfields Revolving Loan Fund, Energy Loan Fund, Intermediary Relending Program (IRP) Loan and Section 108 Loan Guarantee Program	Federal	Financing provided for eligible business projects under economic development initiatives that create jobs for low- and moderate-income persons.	\$10,320,751
Continuum of Care	Federal	Homeless and special needs assistance to create community systems for combating homelessness.	\$8,479,188
Public Housing Authority Funding - Capital Fund	Federal	Develop, finance, and modernize public housing developments and management improvements.	\$2,689,258
Public Housing Operating Subsidy	Federal	Provides operating subsidiaries to housing authorities to assist in funding operating and maintenance.	\$3,180,565
Housing Choice & Veterans Affairs Supportive Housing (VASH) Vouchers under the Section 8 Program	Federal	Federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market.	\$36,135,086
Family Self-Sufficiency Program	Federal	Program to assist public housing residents and section 8 housing choice voucher program participants to connect to supportive services.	\$228,240
Mainstream Vouchers	Federal	Program to provide rental assistance to enable persons with disabilities (elderly and non-elderly) to rent affordable private housing.	\$4,092,080
Neighborhood Stabilization Program (Program Income)	Federal	Mortgage Program, Residential Redevelopment (acquisition and rehabilitation), and Neighborhood Redevelopment.	\$2,000,000
EFSP	Federal	The Emergency Food and Shelter Program meets the needs of hungry and homeless people by providing funds for food and shelter.	\$175,000
EFSP CARES	Federal	Funds to supplement existing Emergency Food and Shelter Program to meet demand from COVID-19	\$292,235
Ryan White Title I	Federal	Services provided by agencies who serve the HIV/AIDS community.	\$7,381,501
Small Business Administration 504 and 7A Program	Federal	Financing provided by agency for eligible business projects under economic development initiatives that create jobs for low- and moderate-income persons.	\$5,000,000
		<b>FEDERAL</b>	<b>\$79,973,904</b>

SHIP	State	State Housing Initiatives Partnership program provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing. Distributed on an entitlement basis, the program is designed to serve very low, low and moderate-income families.	\$7,333,993
		<b>STATE</b>	<b>\$7,333,933</b>
Financial Assisted Agencies (FAA) (PBC Department of Community Services)	Ad Valorem	Funding for the prevention/intervention, treatment and emergency services for substance abuse and mental health services, independent living and support services for people/families with special needs or disabilities, domestic abuse, emergency and shelter services.	\$13,365,991
PBC Economic Development	Ad Valorem	Funding for economic development agencies and business incentive programs to support business development and create job opportunities for low and moderate-income person.	\$4,464,137
Industrial Development Revenue Bonds		Industrial Development Revenue Bonds (IDBs) finance business and industrial expansions for firms with strong credit. IDBs can provide low-interest loans for large projects by permitting the borrower to take advantage of long-term financing with lower than prime interest rates. Additionally, for certain types of manufacturing facilities, interest rates can be lowered further due to the tax-exempt status of the bond issue. Private parties purchase the bonds, in effect making the loan to the borrowing business	\$150,000,000
Impact Fee Affordable Housing Assistance Program (IFAHAP)		Funding received from Impact Fee Investment Earnings to financially support preservation, redevelopment and the creation of affordable housing.	\$1,353,370

Palm Beach County Housing Finance Authority	Private Capital/ Tax Exempt Bonds/ Revolved Funds	Single Family 1st Mortgage Loans \$7M; MF Bond Issuance for six new construction projects \$80M.	\$87,000,000
Borrowers, Banks and other Financial Institutions	Private	Financing provided by the private sector for eligible business projects under economic development initiatives that create jobs for low- and moderate-income persons. (Amount of leverage provided by private sector and financial institutions to support projects identified for funding under Section 108/IRP loans.)	\$13,726,598
		<b>LOCAL</b>	<b>\$269,910,096</b>
		<b>TOTAL</b>	<b>\$357,217,993</b>

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

Palm Beach County expects to receive \$357,217,993 from Federal, State and local sources to complement the FY 2022-2023 CDBG, ESG, and HOME funds totaling \$9,774,103. Of the funds being leveraged \$79,973,904 is from Federal sources, \$7,333,933 from the State and \$269,910,096 from Local sources including Ad Valorem and Private Funds. These funds will be used to undertake community development activities related to providing assistance to the homeless, disabled and underserved population including those having special needs. Funds will also be used for housing purposes and for economic development and infrastructure.

HOME and ESG programs have matching fund requirements. For the HOME program, the match will be provided from the State Housing Initiative (SHIP) Program in the amount of 25% of the annual HOME allocation minus funds budgeted for program administration and CHDO operating expenses. The match is anticipated to be \$574,593. For the ESG program, this will be provided by the ESG subrecipients and the County in an amount no less than \$577,734.

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

All powers, duties and authority relating to the acquisition, disposition, exchange, or lease of real property are governed by PPM-CW-L-023 (Requirements for the Acquisition, Disposition, Lease and Exchange of Real Property), the Florida Statute Title XI, Chapter 125.35 (County Authorized to Sell Real and Personal Property and to Lease Real Property), 125.38 (Sale of County Property

to United States or State), and Palm Beach County Code of Ordinance Chapter 22, Article VI (Real Property Acquisition, Disposition and Leasing).

Palm Beach County keeps records of any unused or abandoned property through the Division of Property & Real Estate Management. If the County has a property that will not be used for County purposes, the land may be sold or donated to not-for-profit organizations and municipalities for the purpose of promoting community interest and welfare (to reach or maximize the goals cited in this plan) as long as the Board of County Commissioners approve the activity for such land. The land can be conveyed or leased upon application from those entities for a price (nominal or otherwise) that the Board may see fit, regardless of the actual value of the land. The Board may also authorize a formal or informal competitive process.

Palm Beach County prioritizes the provision of housing for homeless, extremely-low and low-income families. County staff has proposed the use of suitable county-owned land as one strategy to address this problem. The County is currently procuring a consultant to design options for the development of a small subdivision on a 19-acre parcel in central Palm Beach County, as well as approximately 20 single family lots scattered countywide.

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## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Affordable Rental Housing</b>	Affordable Housing	Countywide	Affordable Rental Housing	HOME - \$1,000,000 ESG- \$183,762 SHIP-\$1,000,000 PBCHFA - \$80,000,000
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Affordability	<b>Objective:</b> Provide decent affordable housing
	<b>Narrative:</b> Increase the supply of affordable rental housing available to low, moderate, and middle-income residents as well as qualified veterans, elderly, disabled, and homeless persons through construction of new rental units.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Rental Units Constructed		589	Households Housing Units
	Rental Assistance (Other)		112	Households Housing Units

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Affordable Homeownership</b>	Affordable Housing	Countywide	Affordable Homeownership	CDBG - \$166,396 HOME – \$892,774 SHIP-\$8,147,615 PBCHFA-\$7,000,000
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Affordability	<b>Objective:</b> Provide decent affordable housing
	<b>Narrative:</b> Increase the supply of affordable housing available to low, moderate, and middle-income residents through construction of new housing units and rehabilitation of existing units			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Homeowner Housing Added		14	Household Housing Units
	Direct Financial Assistance to Homebuyers		60	Household Housing Units
	Mortgage Assistance (Other)		27	Household Housing Units
	Homeowner Housing Rehabilitated		60	Household Housing Units

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Public Services</b>	Non-Housing Community Development	Countywide	Provision of Public Services	CDBG - \$152,604
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Availability/Accessibility	<b>Objective:</b> Create suitable living
	<b>Narrative:</b> Provision of public services to very-low, low, and moderate-income families and individuals. The programs to be provided include, child care, health care, housing counseling, fair housing counseling, unaccompanied youth, and abused and neglected children.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Public service activities other than low/moderate income housing		759	Persons Assisted



Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Special Needs Services</b>	Non-Housing Community Development	Countywide	Provision of Public Services	CDBG - \$90,861
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Availability/Accessibility	<b>Objective:</b> Create suitable living
	<b>Narrative:</b> Provision of services to the mentally, physically and developmentally disabled, youth aging out of foster care, and victims of domestic abuse.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Public service activities other than low/moderate income housing		204	Persons Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Homelessness</b>	Homeless	Countywide	Provision of Public Services, Homeless Assistance	CDBG - \$730,395 ESG - \$459,404
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Availability/Accessibility	<b>Objective:</b> Create suitable living environments
	<b>Narrative:</b> Actions taken to address homelessness will concentrate on homeless prevention and provision of assistance to emergency and transitional shelters to cover operating and program expenses and assistance to persons/families at risk of becoming homeless. Other activities such as street outreach and operation of the HMIS and activities providing housing assistance and services to persons recently released from incarceration who qualify as homeless may also be supported.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Public service activities other than low/moderate income housing benefit		1,367	Persons Assisted
	Tenant based rental assistance/Rapid Rehousing		112	Households Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Public Facilities and Infrastructure</b>	Non-Housing Community Development	City of Greenacres, Town of Lake Park, City of Lake Worth Beach, Town of Lantana, Village of Palm Springs, City of Belle Glade, Unincorporated	Public Facilities and Infrastructure	CDBG - \$2,827,535
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Availability/Accessibility	<b>Objective:</b> Create suitable living
	<b>Narrative:</b> Provision of public facilities and infrastructure in areas where the service area population is predominately low and moderate income, or will serve a limited clientele that is predominately low/moderate income. Activities will be in the form of new construction or rehabilitation/upgrading existing facilities and/or infrastructure to ensure their operation at an efficient level of service.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Public facilities or infrastructure activities other than low/moderate income housing benefit		80,764	Persons Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Code Enforcement</b>	Non-Housing Community Development	City of Belle Glade, City of Pahokee, City of South Bay, Town of Mangonia Park	Code Enforcement	CDBG - \$266,420
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Sustainability	<b>Objective:</b> Create suitable living
	<b>Narrative:</b> Support the work of code enforcement officers to identify and take actions to cure code violations in designated target areas.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Other		35,008	Persons Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
<b>Economic Development</b>	Economic Development	Countywide	Economic Development	CDBG - \$777,818
	<b>Start Year:</b> 2022	<b>End Year:</b> 2023	<b>Outcome:</b> Sustainability	<b>Objective:</b> Create economic opportunities
	<b>Narrative:</b> Funding is provided to County personnel who provide advice to businesses, and explain and organize the participation of businesses in economic development programs operated by the County, State, and Federal governments (Section 108, USDA, Brownfields, among others). Funding is also provided to three business incubators to provide technical assistance to small businesses toward the creation of jobs in the County.			
	<b>Goal Outcome Indicator:</b>		<b>Quantity</b>	<b>Unit of Measurement</b>
	Jobs Created/Retained		198	Jobs
	Businesses Assisted		1,352	Businesses

**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 91.215(b):**

It is estimated that 862 eligible extremely low-income, low-income, and moderate-income families, including homeless individuals/families will be provided with affordable housing assistance during FY 2022-2023. A further discussion of this estimate is discussed under AP-55 – Affordable Housing.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

For FY 2022-2023, the Action Plan identifies a total of nine (9) project areas, within which 41 activities are to be funded under the CDBG, ESG and HOME Programs. These projects include code enforcement, public facilities, public infrastructure, public services, economic development, homeless assistance activities, rapid re-housing, housing related activities, as well as administrative and activity delivery costs needed to undertake the activities. All activities identified in the Plan will be completed within one-three years.

The sum of the funding provided to projects and activities identified in the Action Plan are based on the actual funding award by HUD to the County under the CDBG, ESG and HOME Programs. Program income is used to fund activities identified after the preparation of the Action, and such activities are identified through amendments to the Plan.

#### Projects

	Project Name
1	CDBG22 Code Enforcement
2	CDBG22 Public Facilities
3	CDBG22 Public Infrastructure
4	CDBG22 Rehabilitation
5	CDBG22 Public Services
6	CDBG22 Economic Development
7	CDBG22 Program Administration
8	ESG22 Emergency Solutions Grant
9	HOME22 Home Investment Partnership

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

The funding priorities addressed in the FY 2022-2023 Action Plan correlate closely to those identified in the FY 2020-2024 Consolidated Plan. The following were identified as high priorities in the Strategic Plan portion of the Consolidated Plan: affordable rental housing; affordable homeownership; public services for very-low, low- and moderate income persons/households as well as families with children, elderly, disabled, persons with HIV/AIDS, and persons with alcohol or other addictions; economic development; special needs housing and services; homeless

assistance; public facilities and infrastructure; code enforcement; and demolition and clearance.

The County will utilize funding from multiple sources such as CDBG, HOME, ESG, Section 108, SHIP, CDBG-CV, program income, Ad Valorem, among others to address identified priorities. The decision as to the type of activities and specifically, the activities to be funded, is dependent on the following: applications submitted by County departments and municipalities; homeless priorities established by the Homeless and Housing Alliance and those activities eligible under the ESG Program; directives given by the Board of County Commissioners; the amount of funding available; and, how the specific activity for which funding is requested coincides with the priorities outlined in the Consolidated Plan.

In terms of the existence of obstacles to addressing underserved needs, the major obstacles experienced by Palm Beach County are: the inadequacy of available financial resources to meet the needs of the underserved populations and the vast geographic area that encompasses the County resulting in the eastern urbanized portion being separated from the western agricultural portion causing an allocation of resources (personnel, equipment and funding) which does not optimize economies of scale.

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## AP-38 Project Summary

### Project Summary Information

Project Name		CDBG22 Code Enforcement
1.	Activity Name	City of Belle Glade
	Target Area	Belle Glade
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$176,689
	Planned Activities	Provide support for code enforcement activities within the municipal boundaries of the City of Belle Glade.
	Target Date	September 30, 2023
	Number of Beneficiaries	19,829 persons
	Location Description	110 Dr. Martin Luther King, Jr. Blvd., Belle Glade, FL 33430
2.	Activity Name	City of Pahokee
	Target Area	Pahokee
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$42,651
	Planned Activities	Provide support for code enforcement activities within the municipal boundaries of the City of Pahokee.
	Target Date	September 30, 2023
	Number of Beneficiaries	6,286 persons
	Location Description	207 Begonia Drive, Pahokee, FL 33476
3.	Activity Name	City of South Bay
	Target Area	South Bay
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$32,384
	Planned Activities	Provide support for code enforcement activities within the municipal boundaries of the City of South Bay.
	Target Date	September 30, 2023
	Number of Beneficiaries	6,665 persons
	Location Description	335 SW 2 <sup>nd</sup> Avenue, South Bay, FL 33493
	Activity Name	Town of Mangonia Park



4.	Target Area	Mangonia Park
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$14,696
	Planned Activities	Provide support for code enforcement activities within the Mangonia Park CDBG Target Area.
	Target Date	September 30, 2023
	Number of Beneficiaries	2,228 persons
	Location Description	1755 East Tiffany Drive, Mangonia Park, FL 33407
Total Code Enforcement: \$266,420		
Project Name		CDBG22 Public Facilities
1.	Activity Name	PBC Parks and Recreation – Duncan Padgett Park
	Target Area	Glades Area of Palm Beach County
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$616,088
	Planned Activities	Renovation of an existing softball field to convert it into a multipurpose field.
	Target Date	December 31, 2023
	Number of Beneficiaries	4,675 persons
	Location Description	3701 S.R. 715, Pahokee, FL 33476
2.	Activity Name	PBC Parks and Recreation – Glades Pioneer Park/Orange Bowl Facility – Ph. 3
	Target Area	Glades Area of Palm Beach County
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$824,610
	Planned Activities	Construction of an entrance plaza, a drop-off area and a shade pavilion
	Target Date	December 31, 2023
	Number of Beneficiaries	16,415 persons
	Location Description	866 S.R. 715, Belle Glade, FL 33430
3.	Activity Name	Town of Lantana – Maddock Park
	Target Area	Lantana
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure

	<b>Funding</b>	<b>CDBG: \$55,740</b>
	<b>Planned Activities</b>	<b>Install decorative fencing, upgrade benches, water fountains, and install two exercise stations for dogs.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>6,415 persons</b>
	<b>Location Description</b>	<b>1200 W. Drew Street, Lantana, FL 33462</b>
<b>4.</b>	<b>Activity Name</b>	<b>City of Lake Worth Beach – Harold Grimes Memorial Park</b>
	<b>Target Area</b>	<b>Lake Worth Beach</b>
	<b>Goals Supported</b>	<b>Public Facilities</b>
	<b>Needs Addressed</b>	<b>Public Facilities and Infrastructure</b>
	<b>Funding</b>	<b>CDBG: \$306,691</b>
	<b>Planned Activities</b>	<b>Improvements to the park</b>
	<b>Target Date</b>	<b>December 31, 2023</b>
	<b>Number of Beneficiaries</b>	<b>6,535 persons</b>
	<b>Location Description</b>	<b>515 South A Street, Lake Worth Beach, FL 33460</b>
<b>5.</b>	<b>Activity Name</b>	<b>Town of Lake Park – Ilex Park</b>
	<b>Target Area</b>	<b>Lake Park</b>
	<b>Goals Supported</b>	<b>Public Facilities</b>
	<b>Needs Addressed</b>	<b>Public Facilities and Infrastructure</b>
	<b>Funding</b>	<b>CDBG: \$55,433</b>
	<b>Planned Activities</b>	<b>Acquire and install new playground equipment</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>3,065 persons</b>
	<b>Location Description</b>	<b>Intersection of W. Ilex Drive and N. 8<sup>th</sup> Street, Lake Park, FL 33403</b>
<b>6.</b>	<b>Activity Name</b>	<b>City of Belle Glade – Airport Park</b>
	<b>Target Area</b>	<b>Belle Glade</b>
	<b>Goals Supported</b>	<b>Public Facilities</b>
	<b>Needs Addressed</b>	<b>Public Facilities and Improvements</b>
	<b>Funding</b>	<b>CDBG: \$348,292</b>
	<b>Planned Activities</b>	<b>Rehabilitation of Airport Park to include an exercise trail, building renovations resurfacing of basketball courts and installation of fencing.</b>
	<b>Target Date</b>	<b>December 31, 2023</b>
	<b>Number of Beneficiaries</b>	<b>19,829 persons</b>
	<b>Location Description</b>	<b>1400 N. Main Street, Belle Glade, FL 33430</b>

7.	Activity Name	City of Riviera Beach – Urban Farm Expansion
	Target Area	Riviera Beach
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Improvements
	Funding	CDBG: \$27,287
	Planned Activities	Expansion of existing Urban Farm to increase amount of fresh food and educational programs available to local residents
	Target Date	December 31, 2023
	Number of Beneficiaries	2,500 persons
	Location Description	1663 West Blue Heron Boulevard, Riviera Beach, FL 33404
Total Public Facilities: \$2,234,141		
Project Name		CDBG22 Public Infrastructure
1.	Activity Name	PBC Engineering – Penn Park Resurfacing
	Target Area	n/a
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$454,958
	Planned Activities	Milling and resurfacing of roadways in the Penn Park neighborhood
	Target Date	March 31, 2024
	Number of Beneficiaries	3,255 persons
	Location Description	Erie Drive, Kane Place, Laird Drive, Northview Drive, Pittsburgh Drive, Philadelphia Drive and Southview Drive (Unincorporated PBC)
2.	Activity Name	City of Greenacres – Lift Station Rehabilitation Phase 1
	Target Area	Greenacres
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$198,947
	Planned Activities	Construction of a lift station that will serve a new gravity sewer line.
	Target Date	December 31, 2023
	Number of Beneficiaries	2,090 persons
	Location Description	500 Martin Avenue, Greenacres, FL 33463
	Activity Name	Village of Palm Springs – Park Connector Pathways
	Target Area	Palm Springs
	Goals Supported	Public Infrastructure

	<b>Needs Addressed</b>	<b>Public Facilities and Infrastructure</b>
	<b>Funding</b>	<b>CDBG: \$120,818</b>
	<b>Planned Activities</b>	<b>Construction of designated pedestrian pathways in the Village's CDBG Target</b>
	<b>Target Date</b>	<b>December 31, 2024</b>
	<b>Number of Beneficiaries</b>	<b>15,985 persons</b>
	<b>Location Description</b>	<b>Davis Road and Greenbriar Drive, Palm Springs, FL 33461</b>
<b>Total Public Infrastructure: \$774,723</b>		
<b>Project Name</b>		<b>CDBG22 Rehabilitation</b>
<b>1.</b>	<b>Activity Name</b>	<b>City of Riviera Beach – Rehabilitation Program</b>
	<b>Target Area</b>	<b>Riviera Beach</b>
	<b>Goals Supported</b>	<b>Affordable Homeownership</b>
	<b>Needs Addressed</b>	<b>Affordable Homeowner</b>
	<b>Funding</b>	<b>CDBG: \$166,963</b>
	<b>Planned Activities</b>	<b>Rehabilitation of properties in the City of Riviera Beach's CDBG Target Area.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>5 households</b>
	<b>Project Location</b>	<b>600 West Blue Heron Boulevard, Riviera Beach, FL 33404</b>
<b>Total Rehabilitation: \$166,963</b>		
<b>Project Name</b>		<b>CDBG22 Public and Special Needs Services</b>
<b>1.</b>	<b>Activity Name</b>	<b>Aid to Victims of Domestic Abuse</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Special Needs Services (Victims of Domestic Abuse)</b>
	<b>Needs Addressed</b>	<b>Special Needs Housing and Services</b>
	<b>Funding</b>	<b>CDBG: \$24,833</b>
	<b>Planned Activities</b>	<b>Provide transitional housing to homeless victims of domestic violence and their children.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>26 persons</b>
	<b>Project Location</b>	<b>Confidential Location</b>
<b>2.</b>	<b>Activity Name</b>	<b>Children's Place at Home Safe</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Public Services (Abused and Neglected Children)</b>

	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$18,017</b>
	<b>Planned Activities</b>	<b>Provide therapeutic care to adolescent girls who were removed from their homes due to abuse and/or homelessness.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>20 persons</b>
	<b>Project Location</b>	<b>2840 6<sup>th</sup> Avenue South, Lake Worth, FL 33461</b>
<b>3.</b>	<b>Activity Name</b>	<b>Coalition for Independent Living Options</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Special Needs Services</b>
	<b>Needs Addressed</b>	<b>Special Needs Housing and Services</b>
	<b>Funding</b>	<b>CDBG: \$22,399</b>
	<b>Planned Activities</b>	<b>Purchase and deliver fresh food and prepared meals to persons with disabilities and their families through the agency's DINE Program.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>33 persons</b>
	<b>Project Location</b>	<b>2751 S. Dixie Highway, Suite 203, West Palm Beach, FL 33405</b>
<b>4.</b>	<b>Activity Name</b>	<b>Healthy Mothers Healthy Babies Coalition of Palm Beach County, Inc.</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Public Services (Health Services)</b>
	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$10,712</b>
	<b>Planned Activities</b>	<b>Assist pregnant women and/or their immediate families to access health care and secure other services that the families may be eligible to receive.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>200 persons</b>
	<b>Project Location</b>	<b>4601 Lake Worth Road, Greenacres, FL 33463</b>
<b>5.</b>	<b>Activity Name</b>	<b>Legal Aid Society of Palm Beach County, Inc.</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Fair Housing Activities</b>
	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$56,192</b>
	<b>Planned Activities</b>	<b>Provide fair housing enforcement and educational outreach services to low and moderate income clients.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>

	<b>Number of Beneficiaries</b>	<b>148 persons</b>
	<b>Project Location</b>	<b>423 Fern Street, West Palm Beach, FL 33401</b>
<b>6.</b>	<b>Activity Name</b>	<b>Place of Hope</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Public Services (Abuse and Neglected Children)</b>
	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$16,069</b>
	<b>Planned Activities</b>	<b>Provide services to abused and neglected children through the agency's Comprehensive Case Management Program.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>43 persons</b>
	<b>Project Location</b>	<b>9078 Isaiah Lane, Palm Beach Gardens, FL 33418</b>
<b>7.</b>	<b>Activity Name</b>	<b>Redlands Christian Migrant Association</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Public Services (Child Care Services)</b>
	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$14,608</b>
	<b>Planned Activities</b>	<b>Provide comprehensive child development services to children of farmworkers.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>60 persons</b>
	<b>Project Location</b>	<b>20 Carver Street, Belle Glade, FL 33430</b>
<b>8.</b>	<b>Activity Name</b>	<b>Seagull Industries for the Disabled, Inc.</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Special Needs Services</b>
	<b>Needs Addressed</b>	<b>Special Needs Housing and Services</b>
	<b>Funding</b>	<b>CDBG: \$29,508</b>
	<b>Planned Activities</b>	<b>Provide educational and vocational training to adults with developmental disabilities at its Seagull Achievement Center.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>120 persons</b>
	<b>Project Location</b>	<b>3879 Byron Drive, West Palm Beach, FL 33404</b>
<b>9.</b>	<b>Activity Name</b>	<b>Sickle Cell Foundation</b>
	<b>Target Area</b>	<b>Glades area of Palm Beach County</b>
	<b>Goals Supported</b>	<b>Public Services (Health Services)</b>

	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$18,016</b>
	<b>Planned Activities</b>	<b>Provide comprehensive case management to persons living with sickle cell disease or sickle cell trait in the Glades area of Palm Beach County.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>48 persons</b>
	<b>Project Location</b>	<b>815 Palm Beach Lakes Blvd., West Palm Beach, FL 33401</b>
<b>10.</b>	<b>Activity Name</b>	<b>Urban League of Palm Beach County, Inc.</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Public Services (Housing Counseling Services)</b>
	<b>Needs Addressed</b>	<b>Public Services</b>
	<b>Funding</b>	<b>CDBG: \$18,990</b>
	<b>Planned Activities</b>	<b>Through the Comprehensive Housing Counseling Program, provide services to clients on foreclosures, homelessness prevention, fair housing, first time homebuyer education and pre-purchase counseling.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>240 persons</b>
	<b>Project Location</b>	<b>1700 N. Australian Avenue, West Palm Beach, FL 33407</b>
<b>11.</b>	<b>Activity Name</b>	<b>Vita Nova, Inc.</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Special Needs Services (Youths aging out of foster care)</b>
	<b>Needs Addressed</b>	<b>Special Needs Housing and Services</b>
	<b>Funding</b>	<b>CDBG: \$14,121</b>
	<b>Planned Activities</b>	<b>Provide life skills training to youth, aged 18 to 25 years of age, who aged out of the foster care system.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>25 persons</b>
	<b>Project Location</b>	<b>1316 Alpha Street, West Palm Beach, FL 33401</b>
<b>12.</b>	<b>Activity Name</b>	<b>Senator Philip D. Lewis Center – Homeless Resource Center</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Homeless Services</b>
	<b>Needs Addressed</b>	<b>Homeless Assistance</b>
	<b>Funding</b>	<b>CDBG: \$630,395</b>
	<b>Planned Activities</b>	<b>Operational costs of the center. Services provided to help homeless individuals.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>

	<b>Number of Beneficiaries</b>	<b>402 persons</b>
	<b>Project Location</b>	<b>1000 45<sup>th</sup> Street, West Palm Beach, FL 33407</b>
<b>13.</b>	<b>Activity Name</b>	<b>Program REACH Family Emergency Shelter</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Homeless Services</b>
	<b>Needs Addressed</b>	<b>Homeless Assistance</b>
	<b>Funding</b>	<b>CDBG: \$100,000</b>
	<b>Planned Activities</b>	<b>Operational costs of the shelter. Services provided to help homeless families.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>341 persons</b>
	<b>Project Location</b>	<b>1320 Henrietta Avenue, West Palm Beach, FL 33401</b>
<b>Total Public Services: \$973,860</b>		
	<b>Project Name</b>	<b>CDBG22 Economic Development</b>
<b>1.</b>	<b>Activity Name</b>	<b>Center for Technology, Enterprise and Development (TED Center)</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Economic Development Technical Assistance</b>
	<b>Needs Addressed</b>	<b>Economic Development</b>
	<b>Funding</b>	<b>CDBG: \$250,000</b>
	<b>Planned Activities</b>	<b>A business incubator that will provide technical assistance and services to micro-enterprises and established small businesses.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>17 jobs/62 businesses</b>
	<b>Project Location</b>	<b>401 W. Atlantic Avenue, Delray Beach, FL 33444</b>
<b>2.</b>	<b>Activity Name</b>	<b>Center for Enterprise Opportunity</b>
	<b>Target Area</b>	<b>Countywide</b>
	<b>Goals Supported</b>	<b>Economic Development Technical Assistance</b>
	<b>Needs Addressed</b>	<b>Economic Development</b>
	<b>Funding</b>	<b>CDBG: \$80,000</b>
	<b>Planned Activities</b>	<b>A business incubator that provides counseling services and business training to micro-enterprises and small businesses.</b>
	<b>Target Date</b>	<b>September 30, 2023</b>
	<b>Number of Beneficiaries</b>	<b>5.5 jobs/ 40 businesses</b>
	<b>Project Location</b>	<b>2200 N. Florida Mango Road, West Palm Beach, FL 33409</b>
<b>3.</b>	<b>Activity Name</b>	<b>Black Business Investment Corporation</b>



	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Economic Development Technical Assistance
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$96,000
	<b>Planned Activities</b>	A business incubator that will provide technical assistance and services to micro-enterprises and established small businesses.
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	25 jobs/250 businesses
	<b>Project Location</b>	2001 Broadway, Suite 210, Riviera Beach, FL 33404
<b>4.</b>	<b>Activity Name</b>	DHED Economic Development Services
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Economic Development Services
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$351,818
	<b>Planned Activities</b>	Provide economic development services to businesses in Palm Beach County to help them create or retain full time equivalent jobs.
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	150 jobs/1,000 businesses
	<b>Project Location</b>	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
<b>Total Economic Development: \$777,818</b>		
<b>Project Name</b>		<b>CDBG22 DHED Program Administration</b>
<b>1.</b>	<b>Activity Name</b>	Program Administration
	<b>Funding</b>	CDBG: \$1,298,481
	<b>Planned Activities</b>	General, fiscal and planning administrative expenses incurred by DHED in performing planning, coordinating, and monitoring of CDBG Programs.
	<b>Target Date</b>	December 31, 2023
	<b>Project Location</b>	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
<b>Total Program Administration: \$1,298,481</b>		
<b>Total CDBG Program: \$6,492,406</b>		
<b>Project Name</b>		<b>ESG22 Emergency Solutions Grant</b>
<b>1.</b>	<b>Activity Name</b>	ESG Program Administration

	<b>Target Area</b>	Countywide
	<b>Needs Addressed</b>	Planning/Administration
	<b>Funding</b>	ESG: \$43,330
	<b>Planned Activities</b>	7.4% of the ESG Program is set-aside for eligible planning and administration.
	<b>Target Date</b>	September 30, 2023
	<b>Project Location</b>	810 Datura Street, West Palm Beach, FL 33401 and 100 Australian Avenue, West Palm Beach, FL 33406
2.	<b>Activity Name</b>	ESG Emergency Shelter
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Homeless Services
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	ESG: \$275,642
	<b>Planned Activities</b>	Costs for three agencies (Aid to Victims of Domestic Abuse, the Salvation Army and Young Women's Christian Association) to operate emergency shelters in Palm Beach County.
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	624 persons
	<b>Project Location</b>	810 Datura Street, West Palm Beach, FL 33401
3.	<b>Activity Name</b>	ESG Rapid Re-Housing
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Homeless Prevention
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	ESG: \$183,762
	<b>Planned Activities</b>	Provide rapid re-housing to homeless families in support of homeless intervention activities. Activity will be implemented by Adopt-A-Family
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	112 persons
	<b>Project Location</b>	1712 2 <sup>nd</sup> Avenue N, Lake Worth Beach, FL 33460
4.	<b>Activity Name</b>	Homeless Management Information system
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Homeless Services
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	ESG: \$75,000

	Planned Activities	Funding to support the administration of the HUD required Client Management Information System to assist homeless individuals and families with services
	Target Date	September 30, 2023
	Project Location	810 Datura Street, West Palm Beach, FL 33401
Total ESG Program: \$577,734		
Project Name		HOME22 HOME Investment Partnership Program
1.	Activity Name	HOME Program Administration and Planning
	Funding	HOME: \$270,396
	Planned Activities	10% of the total HOME Program allocation is set-aside for eligible administrative costs incurred during the implementation of the HOME Program
	Target Date	September 30, 2023
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
2.	Activity Name	HOME CHDO Set-Aside Program
	Target Area	Countywide
	Goals Supported	Affordable Homeownership
	Needs Addressed	Affordable Homeownership
	Funding	HOME: \$405,594
	Planned Activities	15% of the total HOME Program allocation is set-aside to provide funding to Community Housing Development Organizations (CHDOs) to undertake housing activities to benefit families with incomes at or below 80% of the AMI for Palm Beach County
	Target Date	September 30, 2023
	Number of beneficiaries	4 units
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL #3406
3.	Activity Name	HOME CHDO Operating Expenses
	Funding	HOME: \$135,198
	Planned Activities	5% of the total HOME Program allocation is set-aside for operating expenses of CHDOs, which will be used to administer HOME funded activities
	Target Date	September 30, 2023
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
4.	Activity Name	HOME Rental Housing Development
	Target Area	Countywide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Rental Housing

	<b>Funding</b>	HOME: \$1,000,000
	<b>Planned Activities</b>	Funding will be provided to developers for new construction and/or rehabilitation of affordable multi-family rental units for low- and moderate-income households
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	20 housing units
	<b>Project Location</b>	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
5.	<b>Activity Name</b>	HOME Homebuyer Assistance Program
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Homeownership
	<b>Funding</b>	HOME: \$892,775
	<b>Planned Activities</b>	Funding will be provided in the form of second mortgages to very-low, low- and moderate-income first-time homebuyers.
	<b>Target Date</b>	September 30, 2023
	<b>Number of Beneficiaries</b>	9 households
	<b>Project Location</b>	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
<b>Total HOME Program: \$2,703,963</b>		

## AP-50 Geographic Distribution – 91.220(f)

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

For FY 2022-2023, Palm Beach County plans to utilize 30% of its CDBG allocation in 10 of the 20 CDBG Target Areas identified in the FY 2020-2024 Consolidated Plan, and one non-target area of unincorporated Palm Beach County. These areas are located throughout the jurisdiction as shown below. The identified target areas are characterized by concentrations of low and moderate-income persons, concentrations of housing problems, and a need for capital improvements.

CDBG Target Area	Low/Mod Income%*	Minority Concentration%**
City of Belle Glade	74	69
City of Greenacres	73	41
Town of Lake Park	68	65
City of Lake Worth Beach	79	44
Town of Lantana	55	27
Town of Mangonia Park	82	99
City of Pahokee	76	70
Village of Palm Springs	71	32
City of Riviera Beach	69	74
City of South Bay	71	67
Unincorporated Palm Beach County	67	62

\* Source: 2011-2015 American Community Survey

\*\* Source: 2016-2020 American Community Survey

## Geographic Distribution

Target Area	Percentage of Funds
City of Belle Glade	8
City of Greenacres	3
Town of Lake Park	1
City of Lake Worth Beach	4
Town of Lantana	1
Town of Mangonia Park	1
City of Pahokee	1
Village of Palm Springs	1
City of Riviera Beach	2
City of South Bay	1
Unincorporated PBC	7
<b>TOTAL</b>	<b>30%</b>

### Rationale for the priorities for allocating investments geographically

The Palm Beach County jurisdiction is currently comprised of unincorporated Palm Beach County and 31 municipalities which have Inter-local Cooperation Agreements with the County. There are 20 identified CDBG target Areas, ten (10) in municipalities and ten (10) in unincorporated county. In order to qualify as a CDBG target area, the following conditions had to be met:

For eastern municipalities in Palm Beach County:

- At least 51% of the residents of an area must be of low and moderate income;
- Existing land use must be at least 51% residential
- The identified area must be one contiguous geographic area, no less than 0.5 square miles and no more than 2.0 square miles in size.
- Area must exhibit visible signs of physical deterioration or need for improvements

For western municipalities (Glades area) in Palm Beach County:

- At least 51% of the residents of the area must be of low and moderate income;
- The identified area is the boundary of each municipality. Residents in the three Glades area municipalities (Belle Glade, Pahokee and South Bay) are more than 51% low and moderate income.
- Areas must exhibit visible signs of physical deterioration or need for improvements.

For unincorporated Palm Beach County:

- At least 51% of the residents of an area must be of low and moderate income;

- Existing land use must be at least 51% residential
- The identified area must be one contiguous geographic area, no less than 0.1 square mile and no more than 2.0 square miles in size.
- Area must exhibit visible signs of physical deterioration or need for improvements

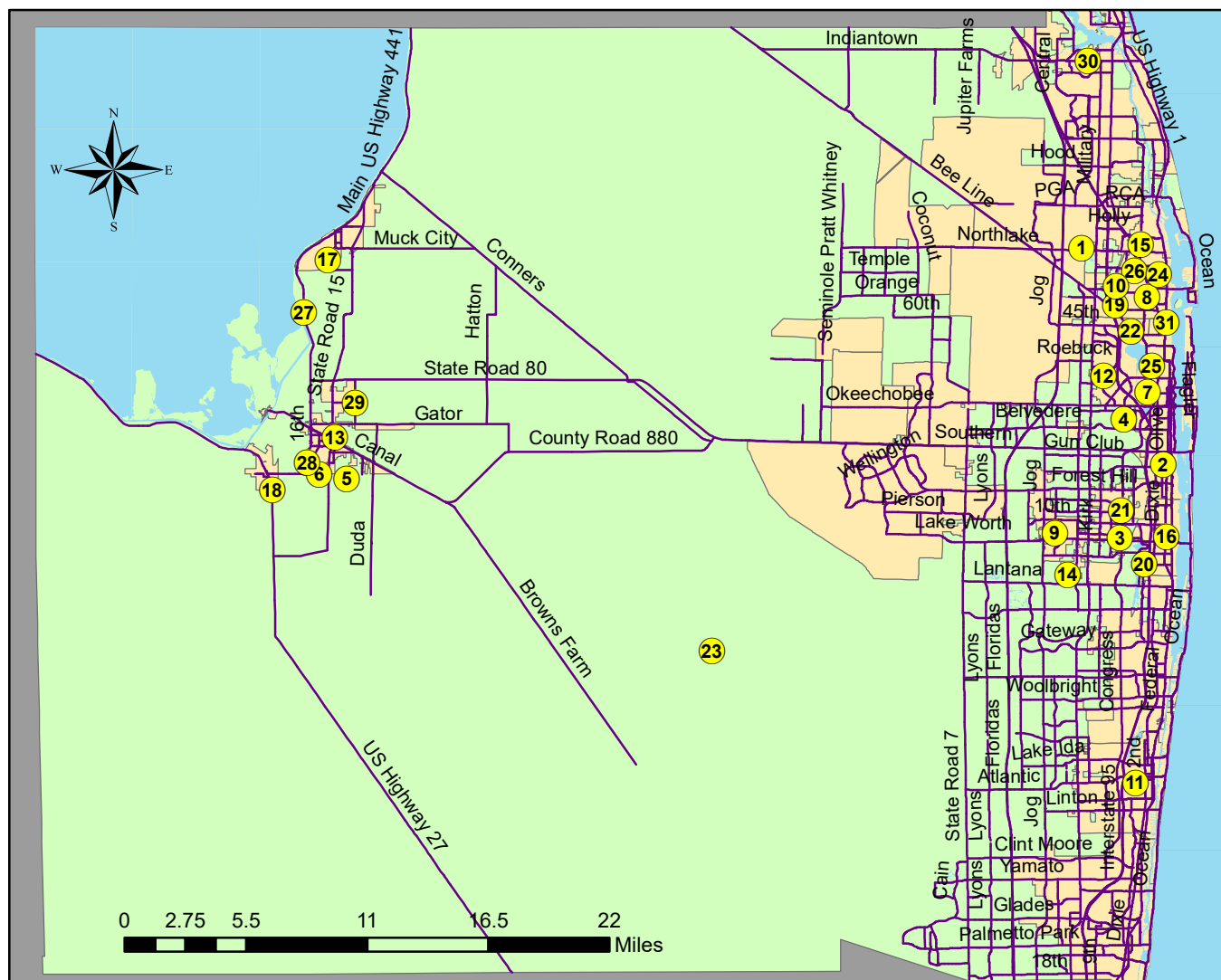
CDBG funding will automatically be awarded to municipalities with a target area and is used exclusively to undertake capital improvement, code enforcement or housing revitalization projects. Funding awards to assist projects in unincorporated Palm Beach County are also directed to CDBG target areas, unless a particular activity is identified by County Administration.

The amount of funding awarded to each municipality with a CDBG target area and to unincorporated CDBG target areas is based on the proportionate share that each contributes to the overall CDBG grant received by the county after deducting funding for program administration, public services, economic development, and other activities having countywide impact. Municipalities that do not have CDBG target areas are not guaranteed to receive CDBG funding.

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# PALM BEACH COUNTY

## FY 2022-2023 GEOGRAPHIC DISTRIBUTION OF CDBG ACTIVITIES



### FY 2021-2022 CDBG Activities

1. Place of Hope
2. Coalition for Independent Living Options
3. Children's Place at HomeSafe
4. Vita Nova, Inc.
5. Redlands Christian Migrant Assoc.
6. Sickle Cell Foundation
7. Legal Aid Society
8. Seagull Industries
9. Healthy Mothers/Healthy Babies
10. Urban League of Palm Beach County
11. Center for Technology, Enterprise, and Development
12. Center for Enterprise Opportunity
13. City of Belle Glade - Code Enforcement\*
14. City of Greenacres - Life Station Construction\*
15. Town of Lake Park - Ilex Park Improvements\*
16. City of Lake Worth - Memorial Park Improvements\*
17. City of Pahokee - Code Enforcement\*
18. City of South Bay - Code Enforcement\*
19. Town of Mangonia Park - Code Enforcement\*
20. Town of Lantana - Maddock Park Improvements\*
21. Village of Palm Springs - Pathway Construction\*
22. Senator Philip D. Lewis Homeless Resource Center
23. Aid to Victims of Domestic Abuse (Confidential Location)
24. City of Riviera Beach - Urban Farm Expansion\*
25. Program REACH Family Emergency Shelter
26. City of Riviera Beach - Rehabilitation Program\*
27. PBC Parks - Duncan Padgett Park Improvements\*
28. PBC Parks - Glades Pioneer Park Improvements
29. City of Belle Glade - Airport Park Improvement\*
30. PBC Engineering - Penn Park Roadway Improvements
31. Black Business Investment Corporation

### Legend

- CDBG Activities
- Major Roads
- Water Bodies
- Municipal Boundaries
- Unincorporated Palm Beach County
- \* CDBG Target Area

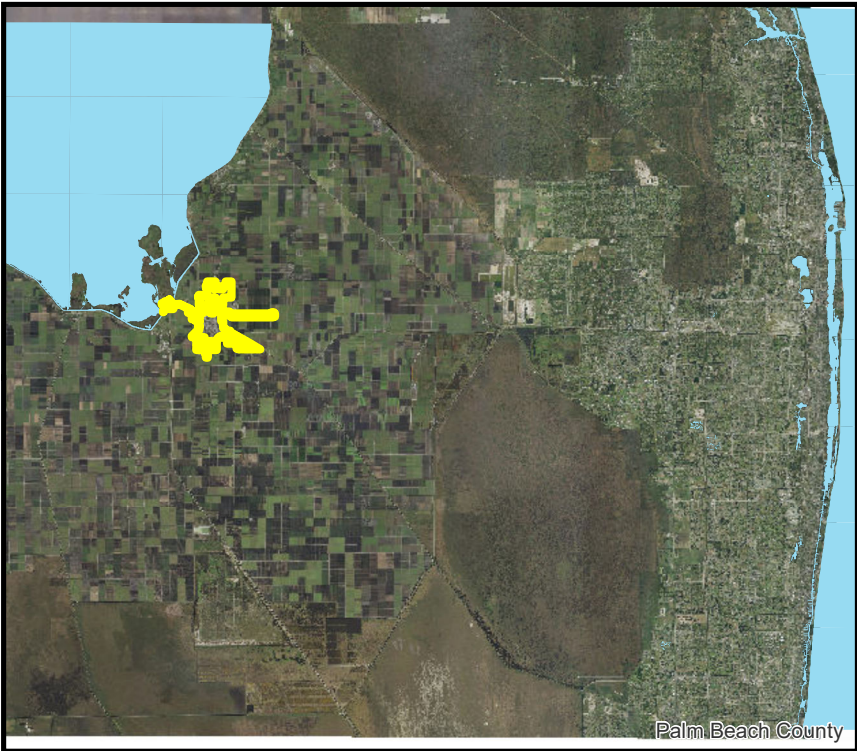
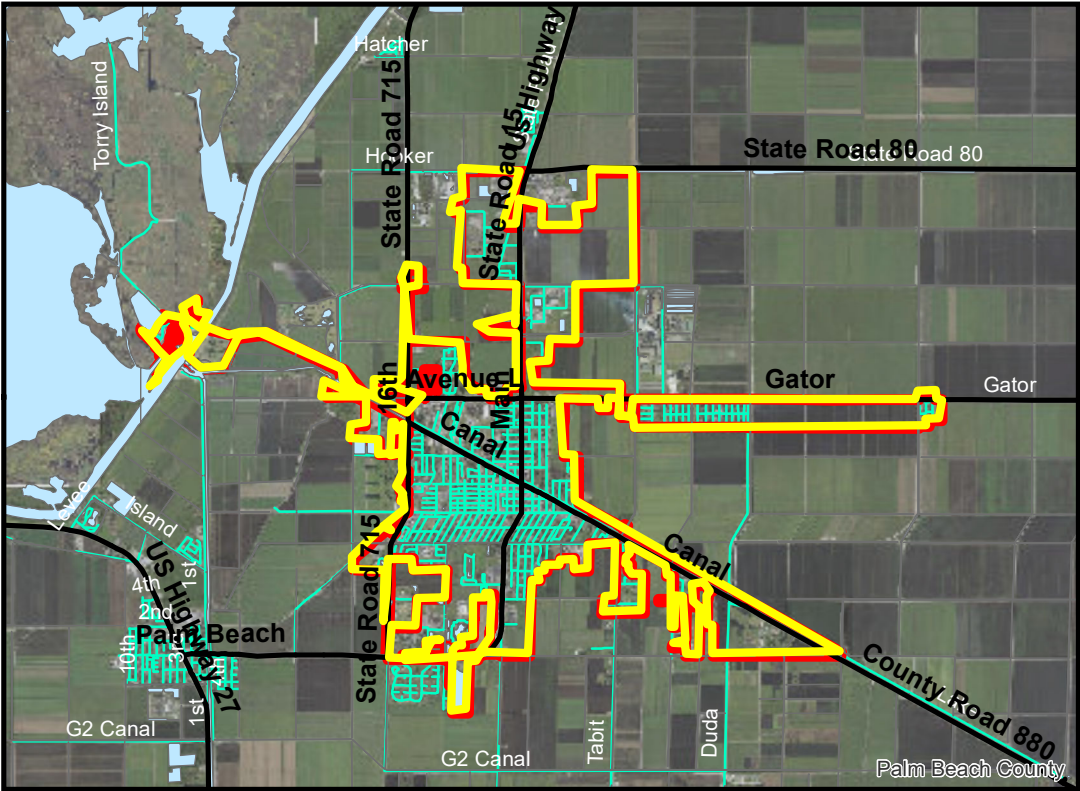
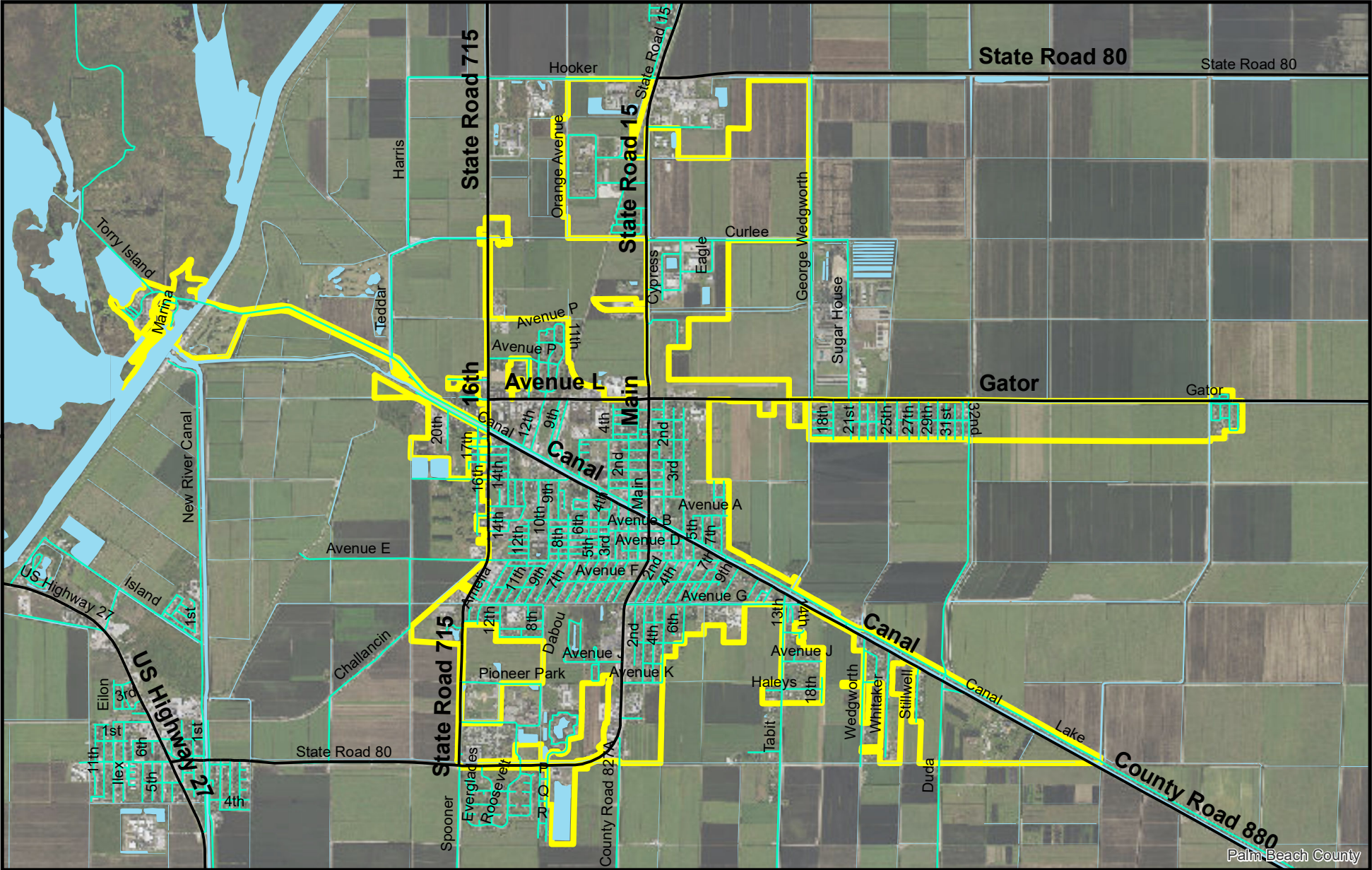


PBC Department of Housing and Economic Department - June 2022



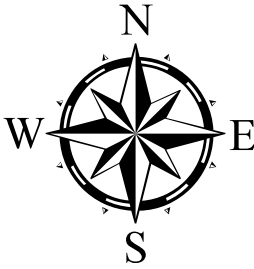


Palm Beach County  
Community Development Block Grant Program  
City of Belle Glade - CDBG Target Area



Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



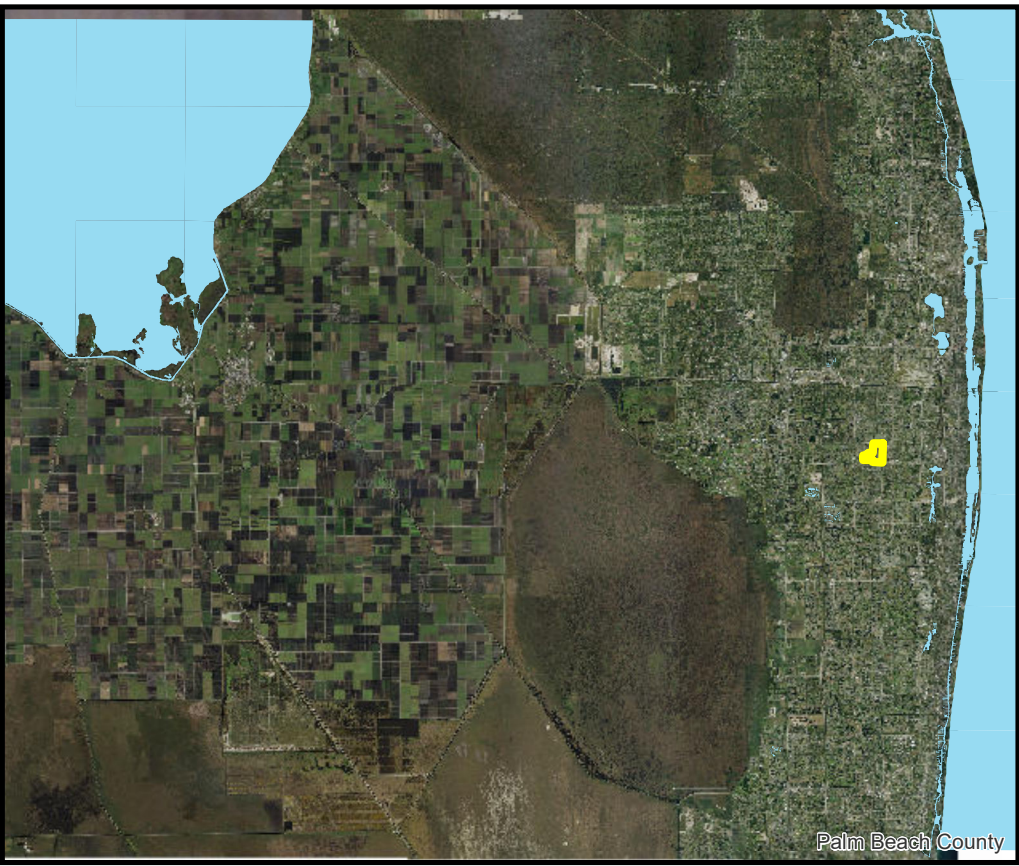
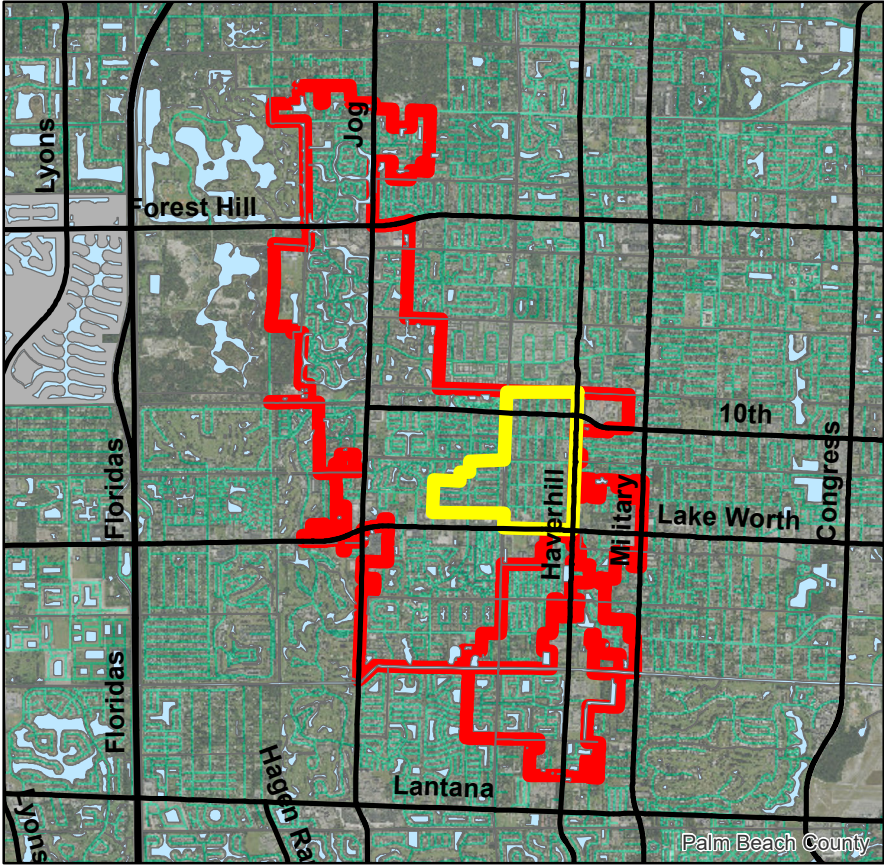
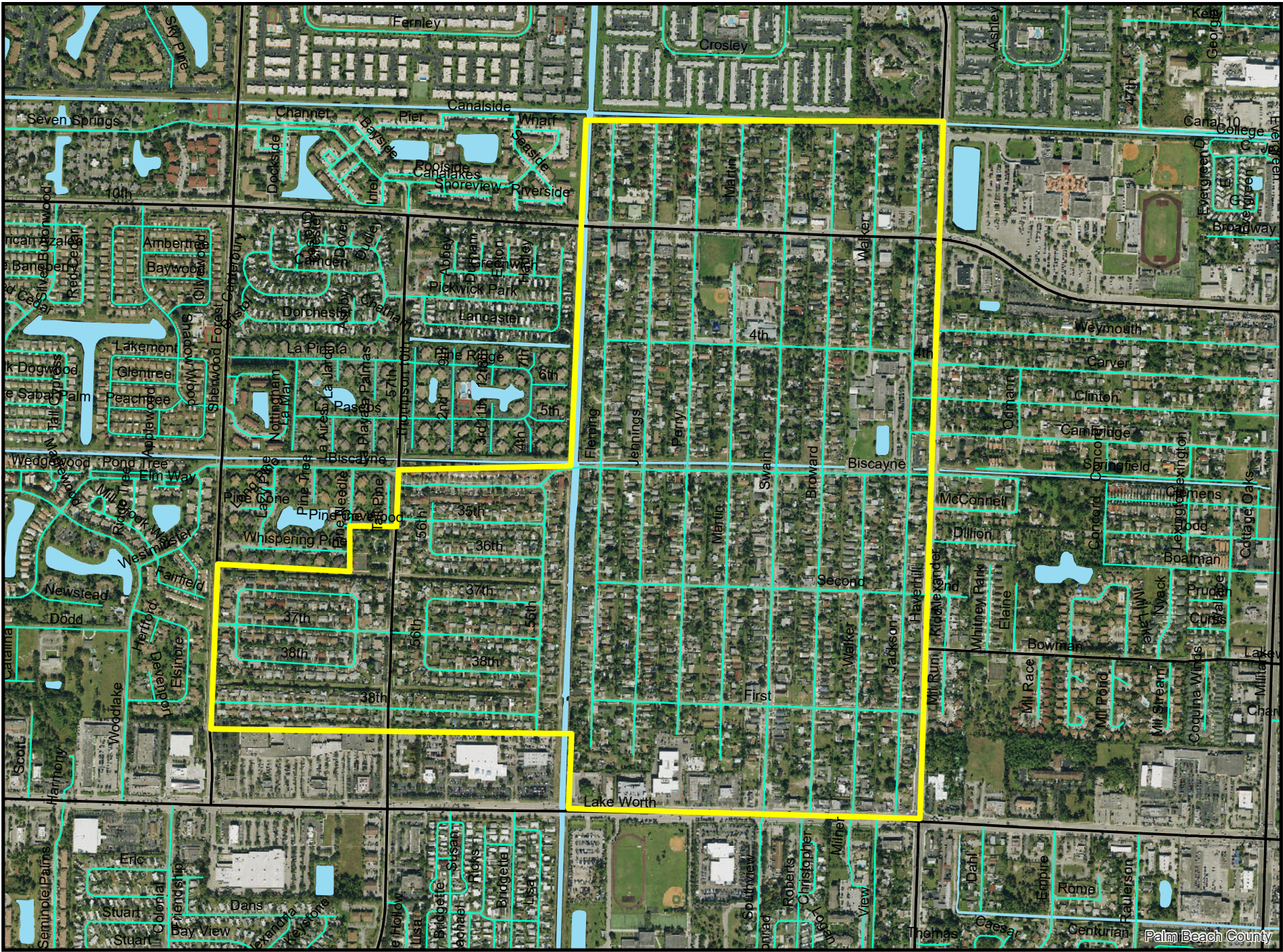
Source: 2011-2015 American Community Survey (Low/Mod Income)

Prepared by PBC Department of Housing and Economic Department - June 2021



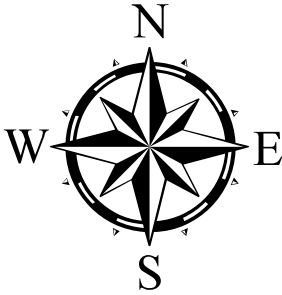


Palm Beach County  
Community Development Block Grant Program  
City of Greenacres - CDBG Target Area



Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



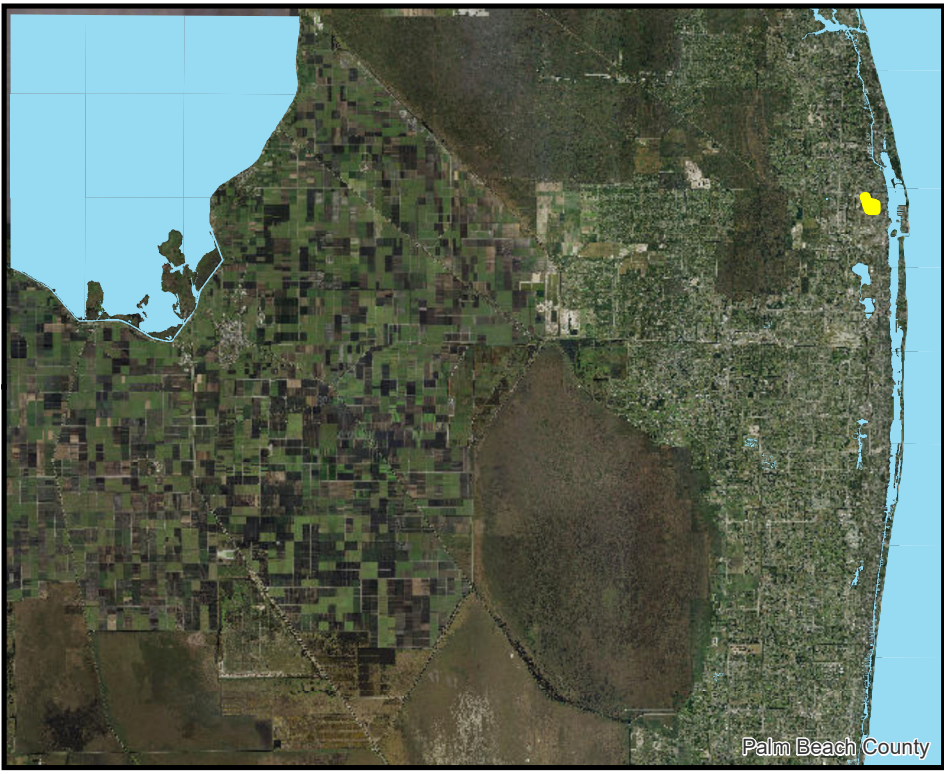
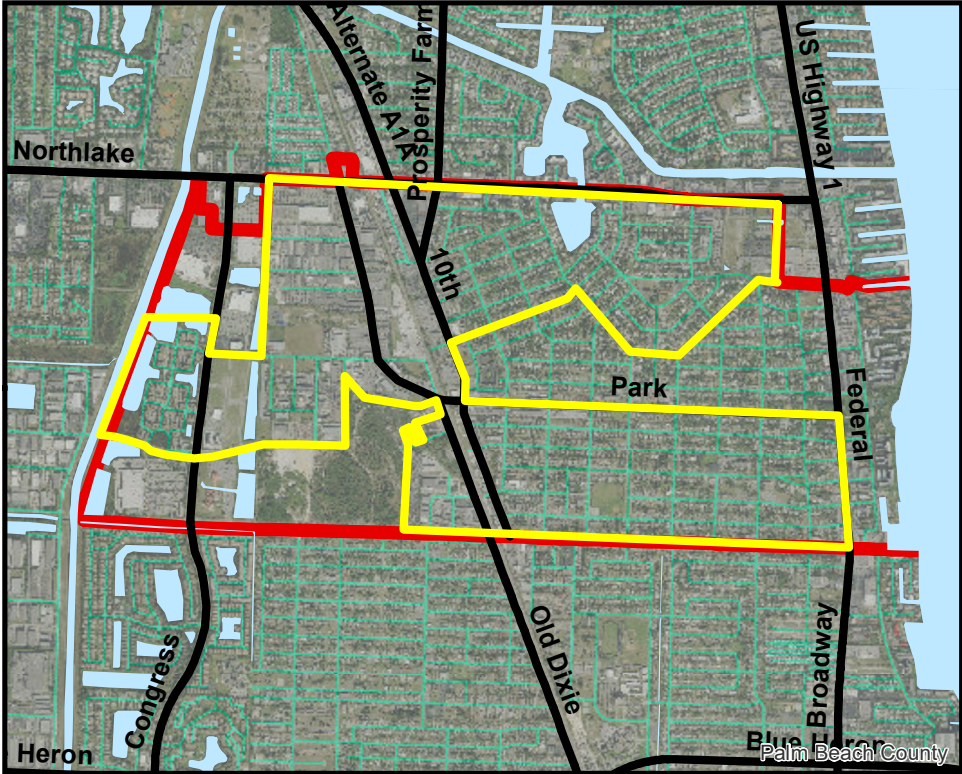
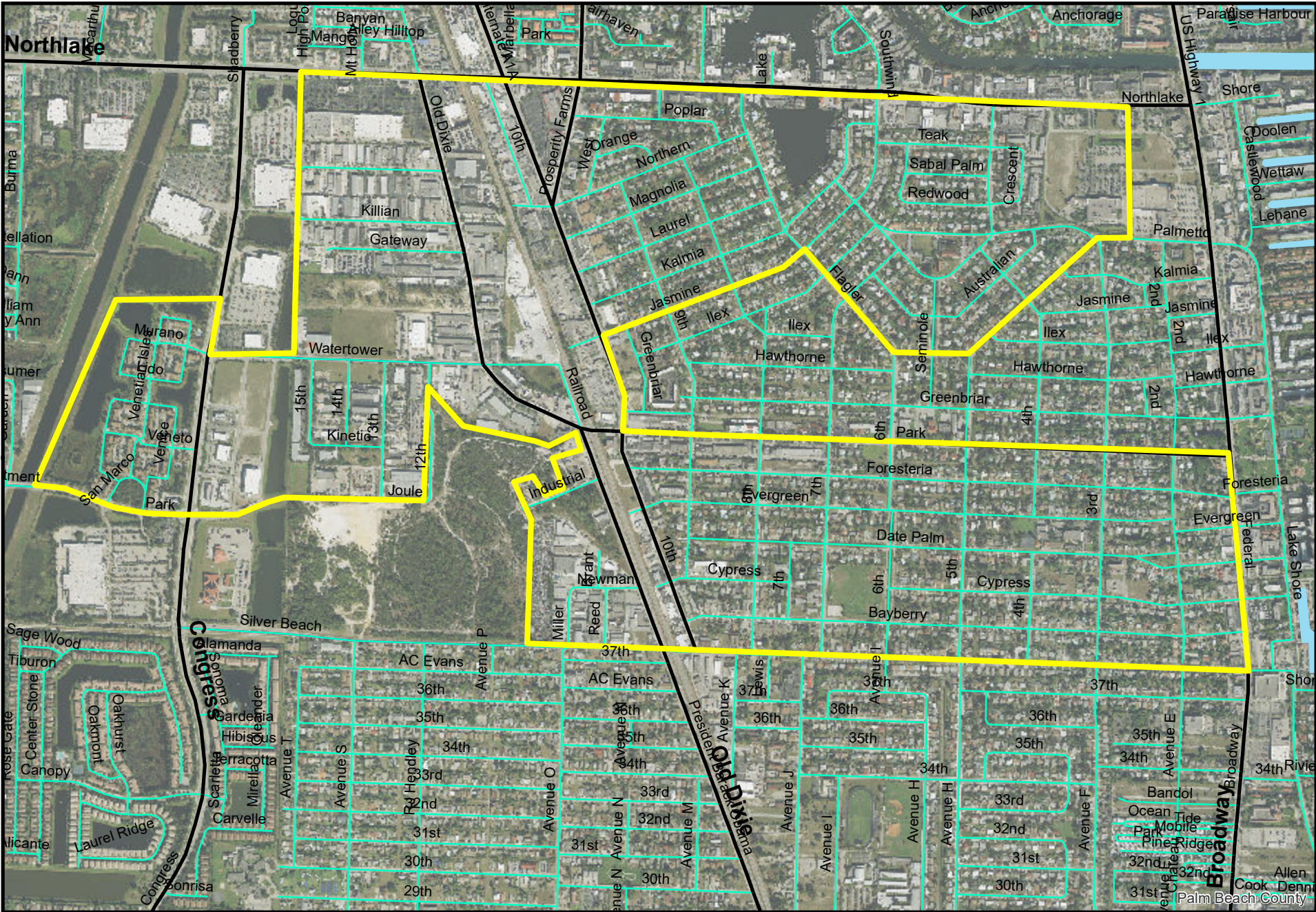
Source: 2011-2015 American Community Survey (Low/Mod Income)

Prepared by PBC Department of Housing and Economic Development - June 2021



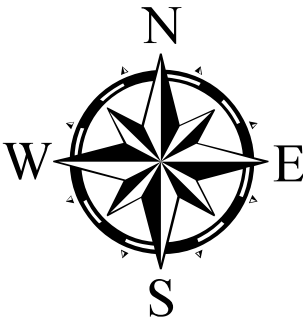


Palm Beach County  
Community Development Block Grant Program  
Town of Lake Park - CDBG Target Area



Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



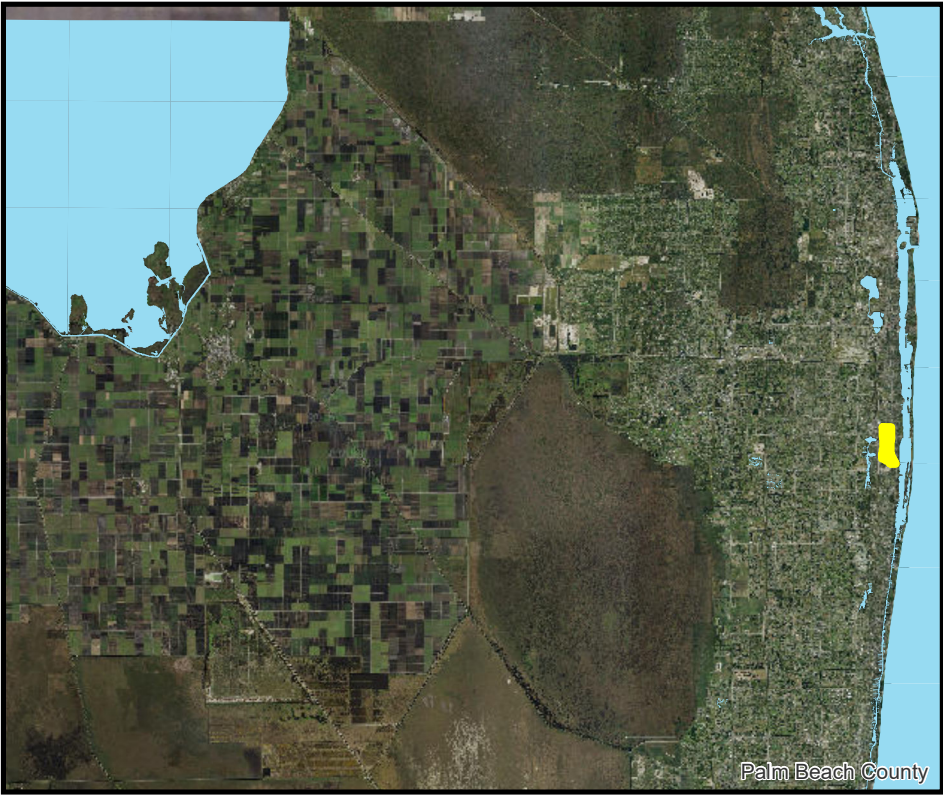
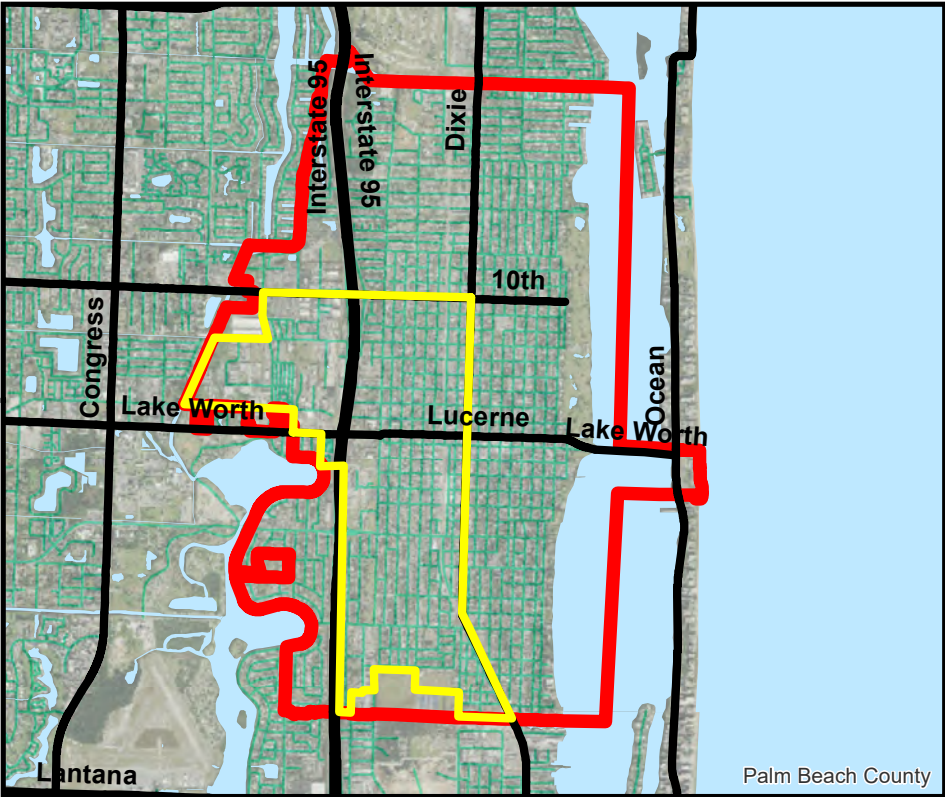
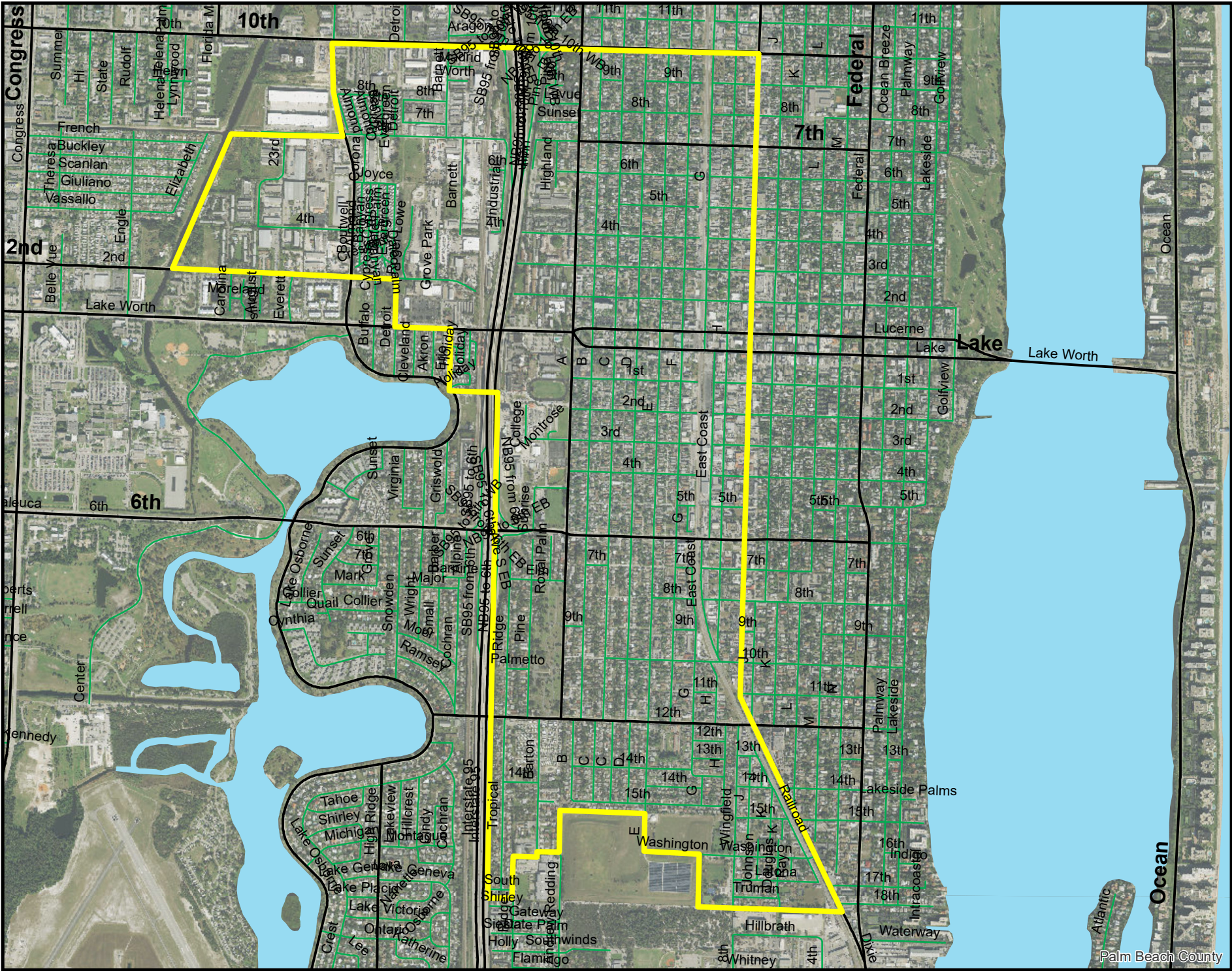
Source: 2011-2015 American Community Survey (Low/Mod Income)

Prepared by PBC Department of Housing and Economic Development - June 2021



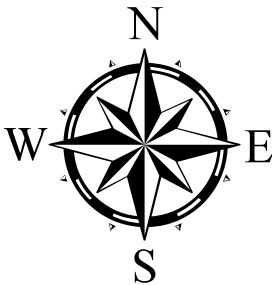


Palm Beach County  
Community Development Block Grant Program  
City of Lake Worth Beach - CDBG Target Area



Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



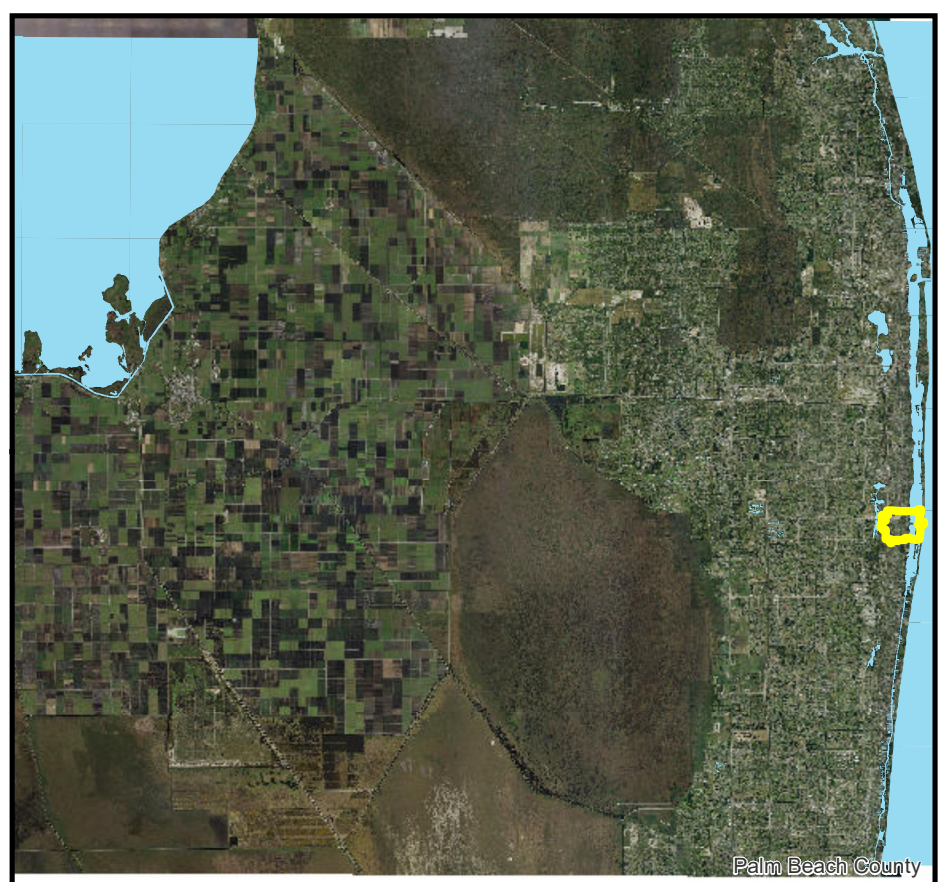
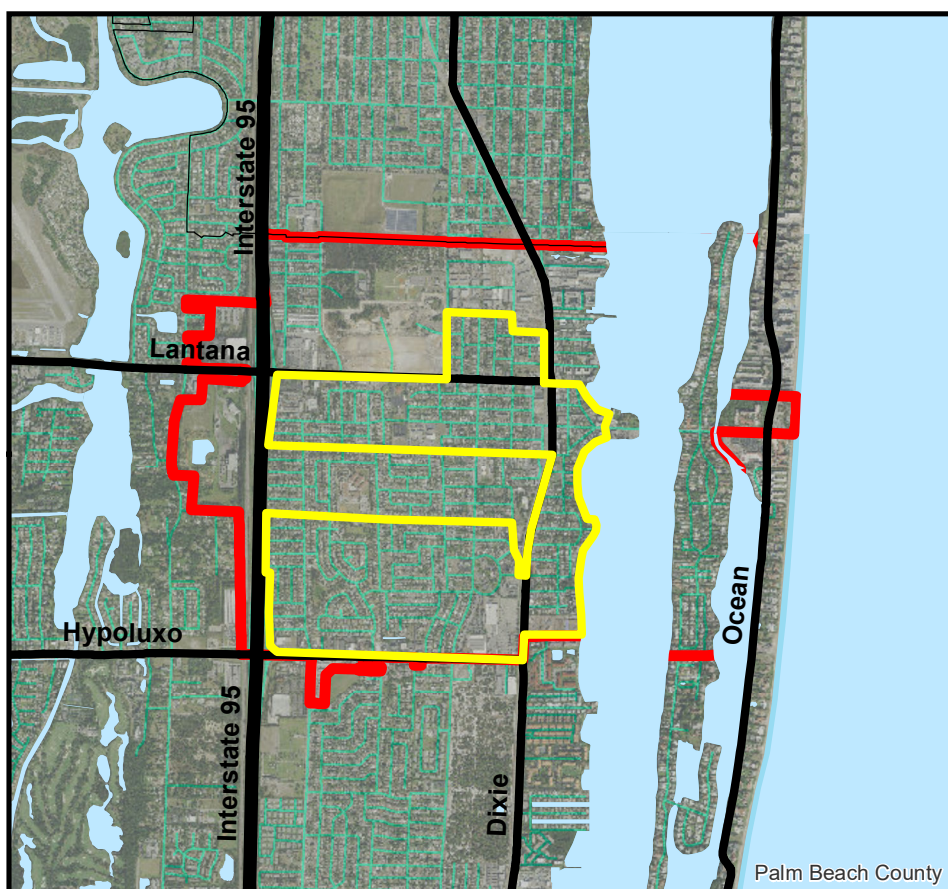
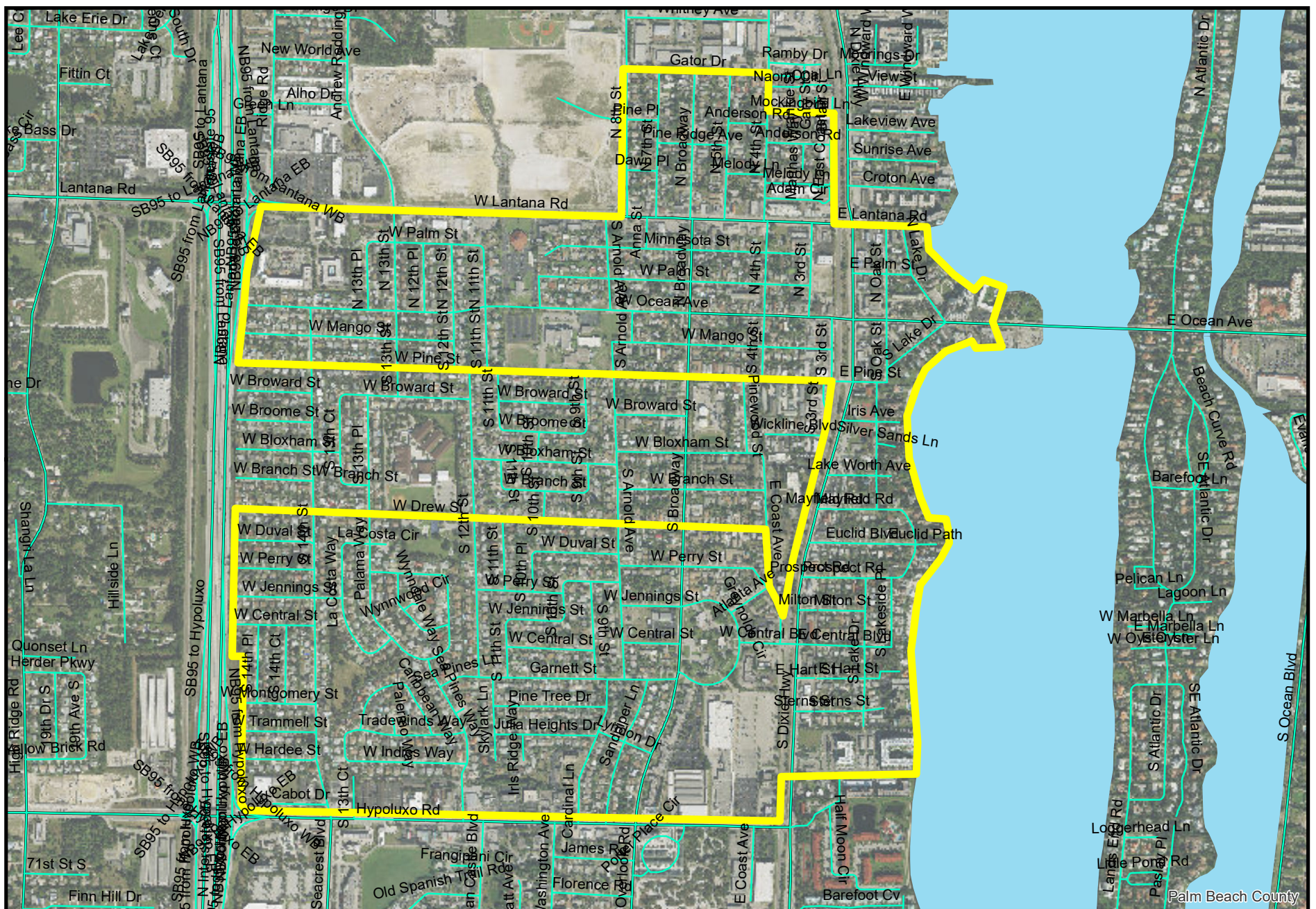
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Prepared by PBC Department of Housing and Economic Development - June 2021

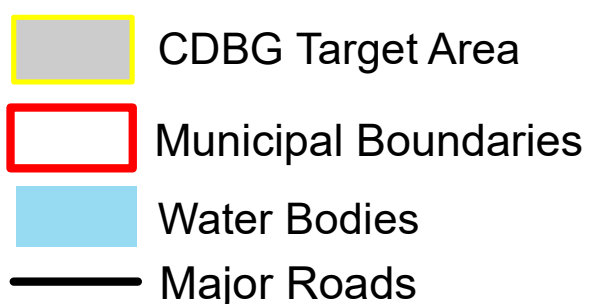




**Palm Beach County  
Community Development Block Grant Program  
Town of Lantana - CDBG Target Area**



## Legend



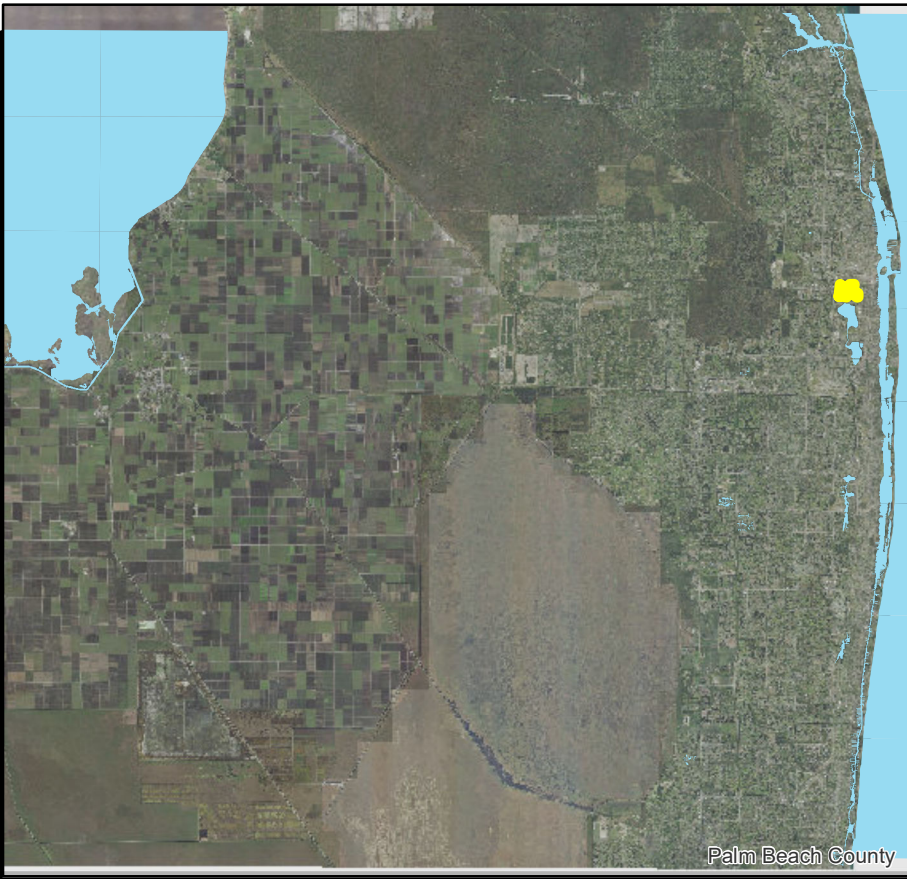
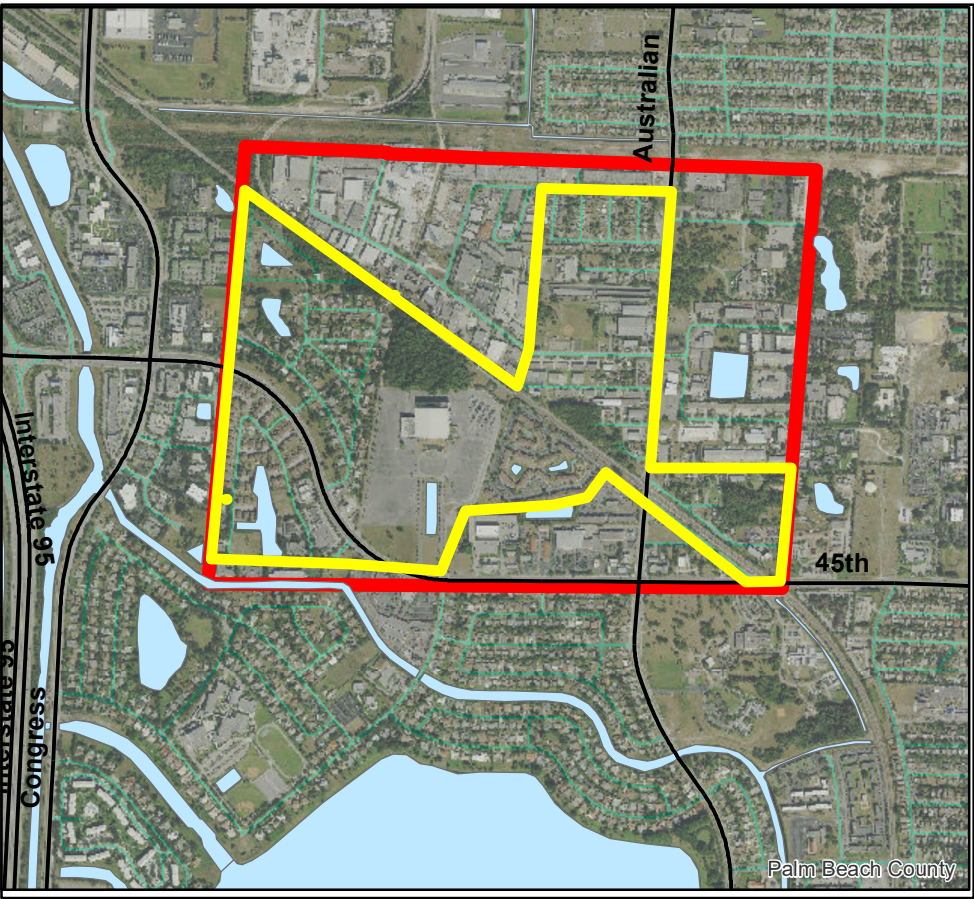
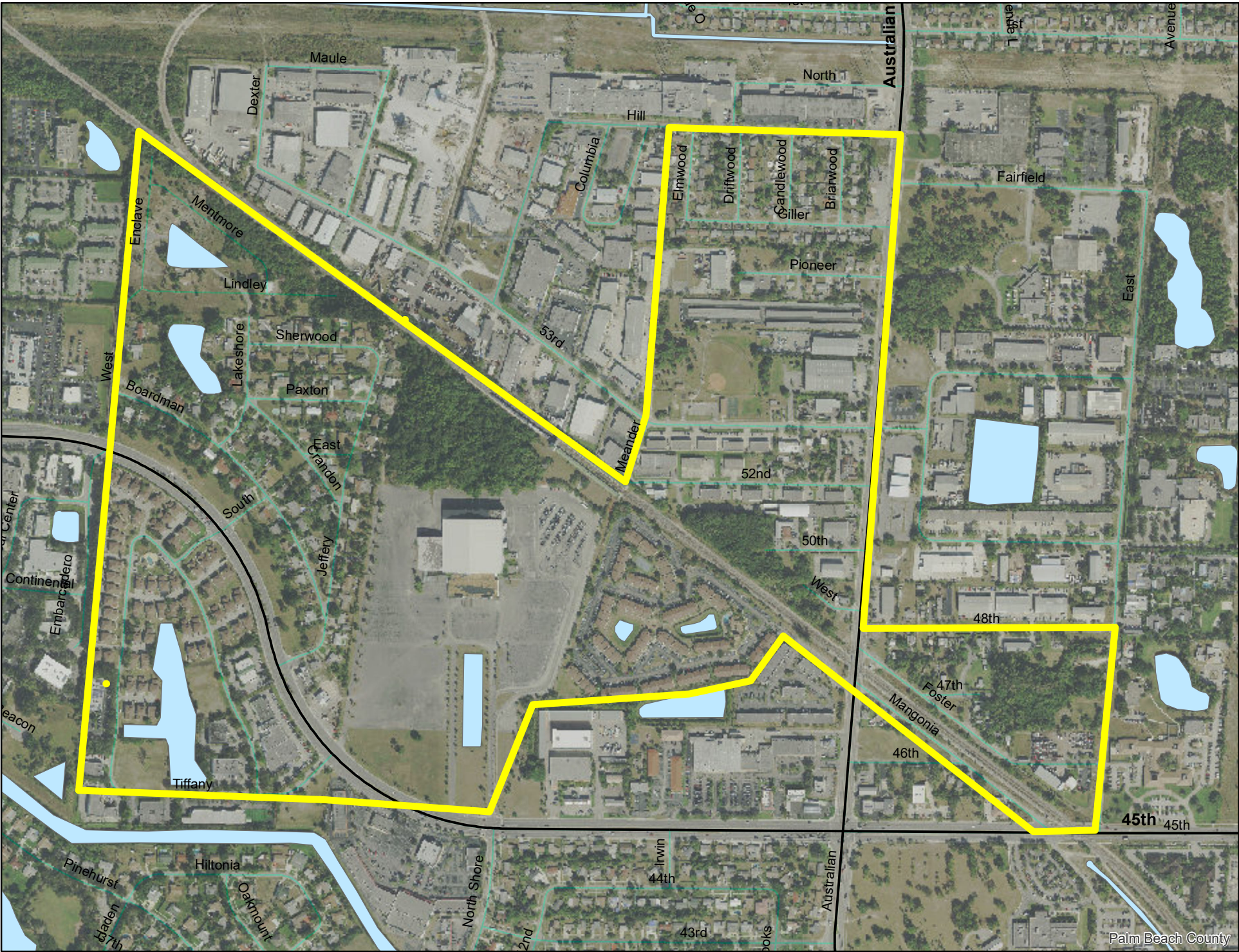
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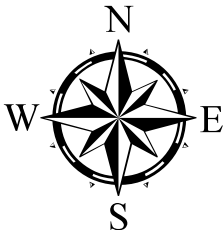


Palm Beach County  
Community Development Block Grant Program  
Town of Mangonia Park - CDBG Target Area



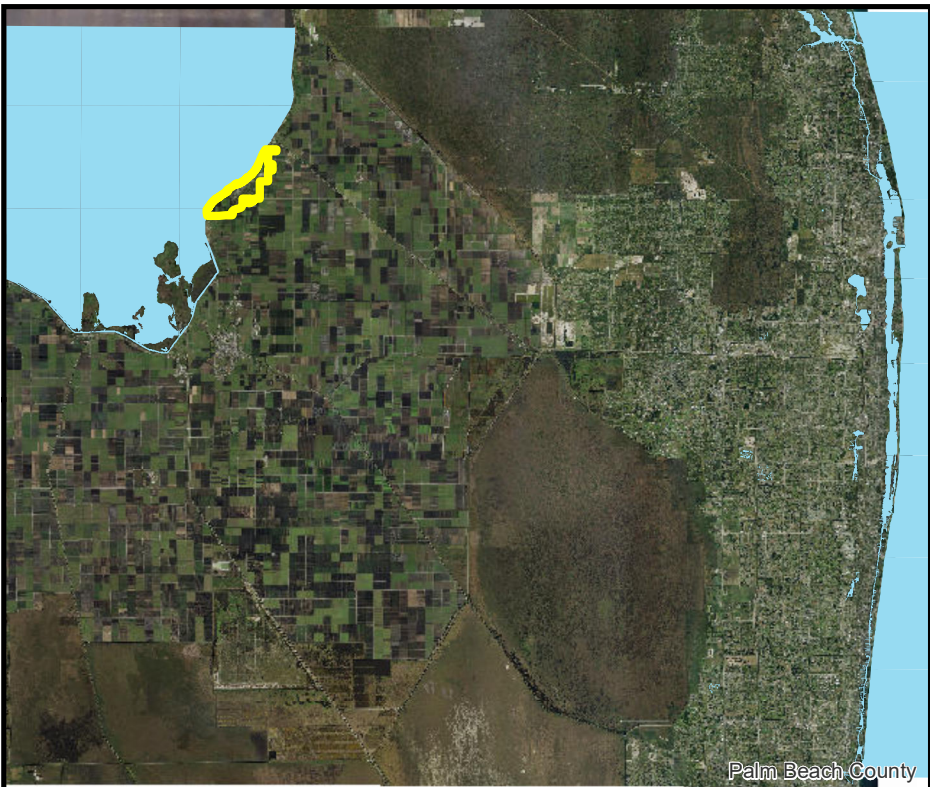
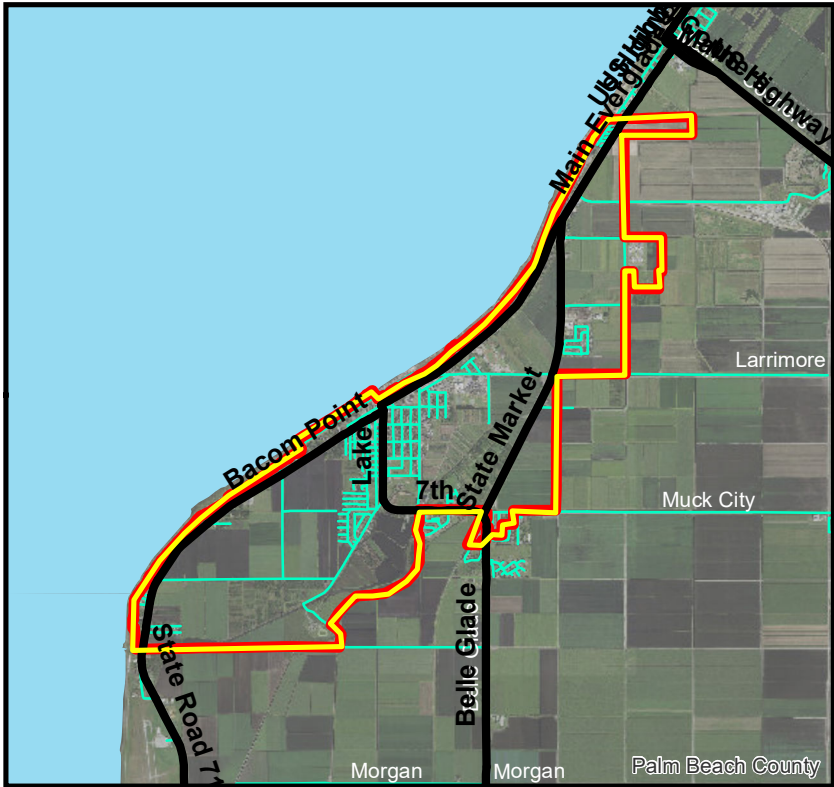
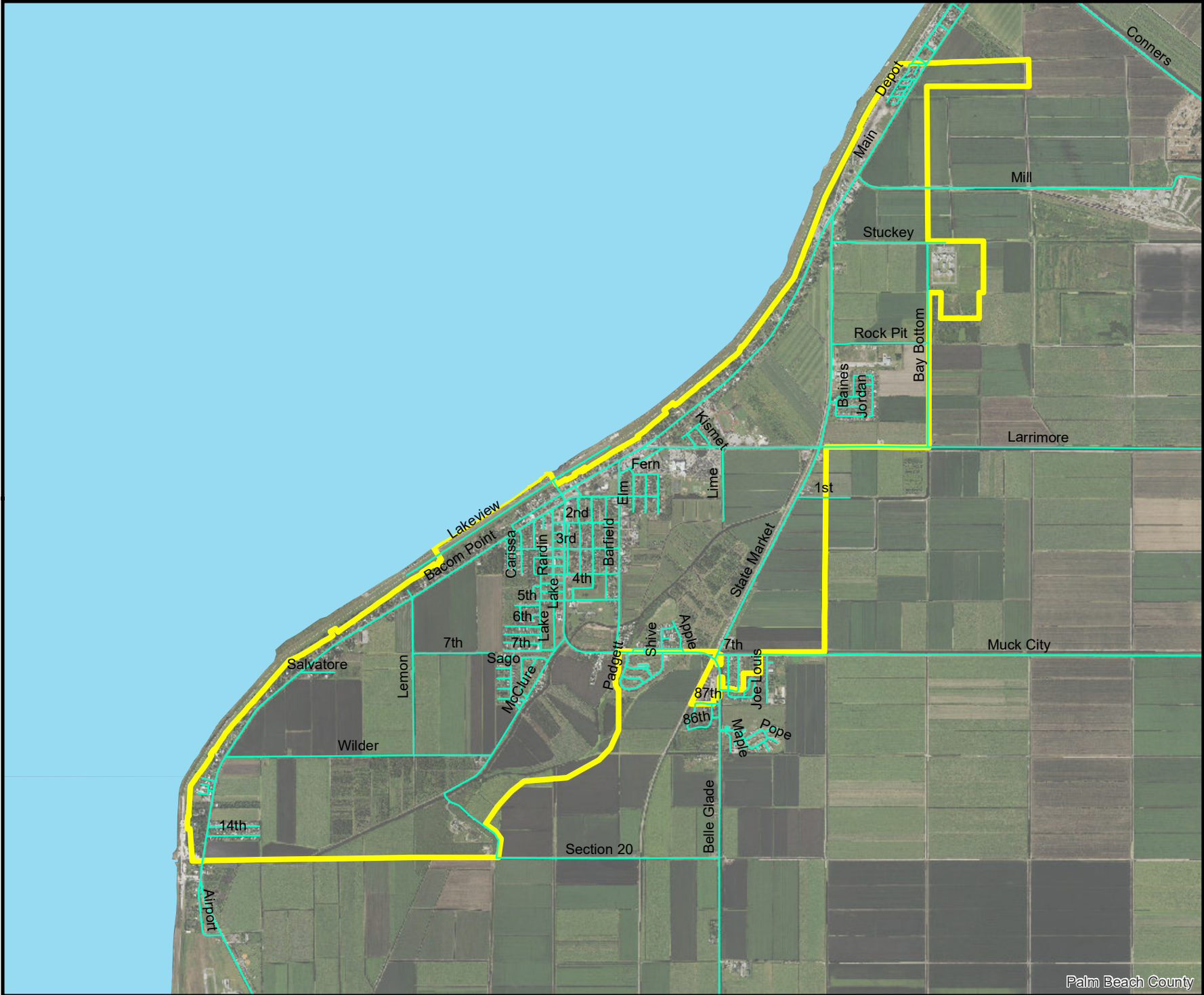
Legend

-  CDBG Target Area
-  Municipal Boundaries
-  Water Bodies
-  Major Roads







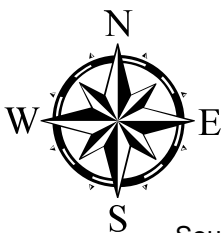
Source: 2011-2015 American Community Survey (Low/Mod Income)  
Prepared by PBC Department of Housing and Economic Development - June 2021





## Legend

-  CDBG Target Area  
 Municipal Boundaries  
 Water Bodies  
 Major Roads



Source: 2011-2015 American Community Survey (Low/Mod Income)  
Prepared by PBC Department of Housing and Economic Development - June 2021

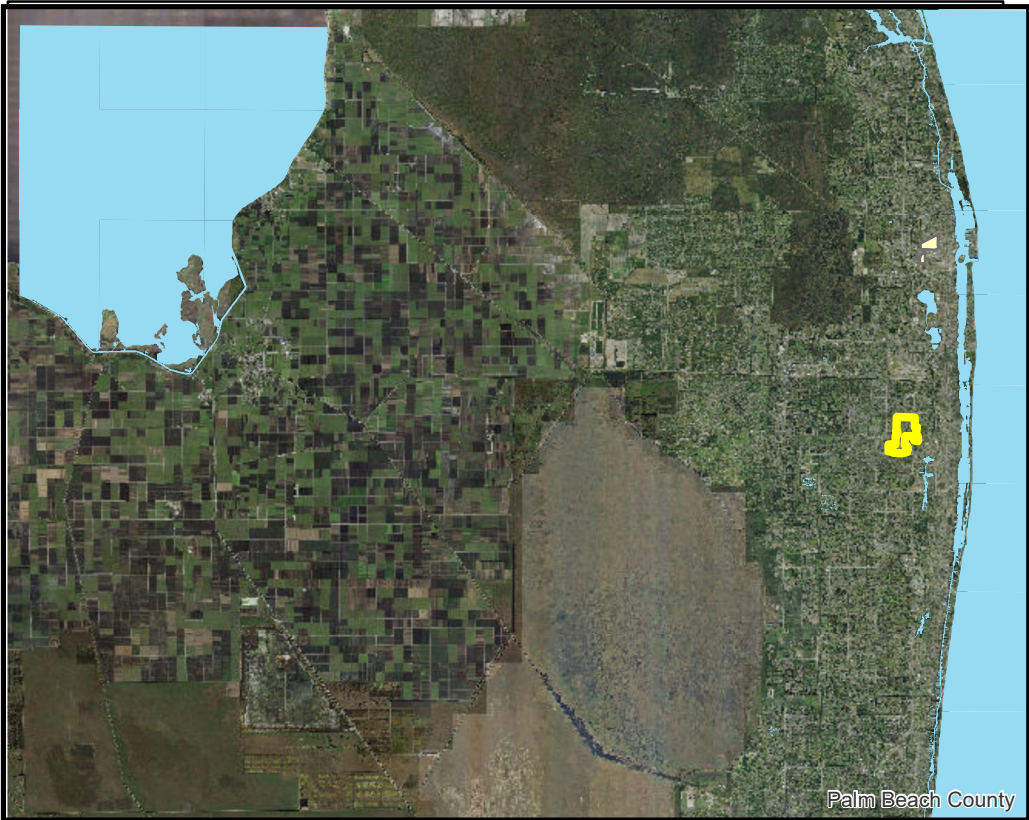
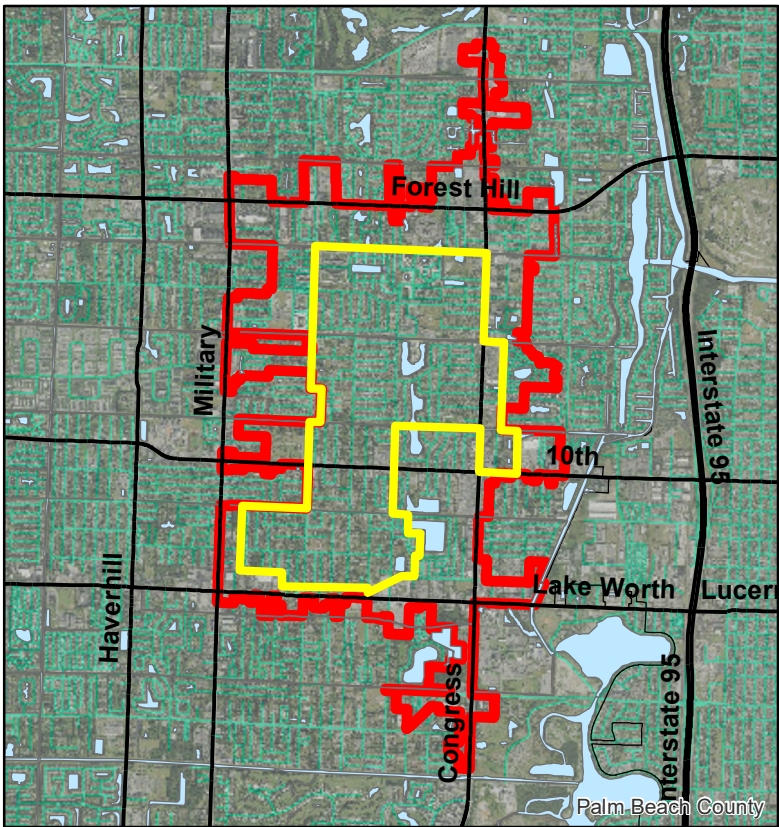
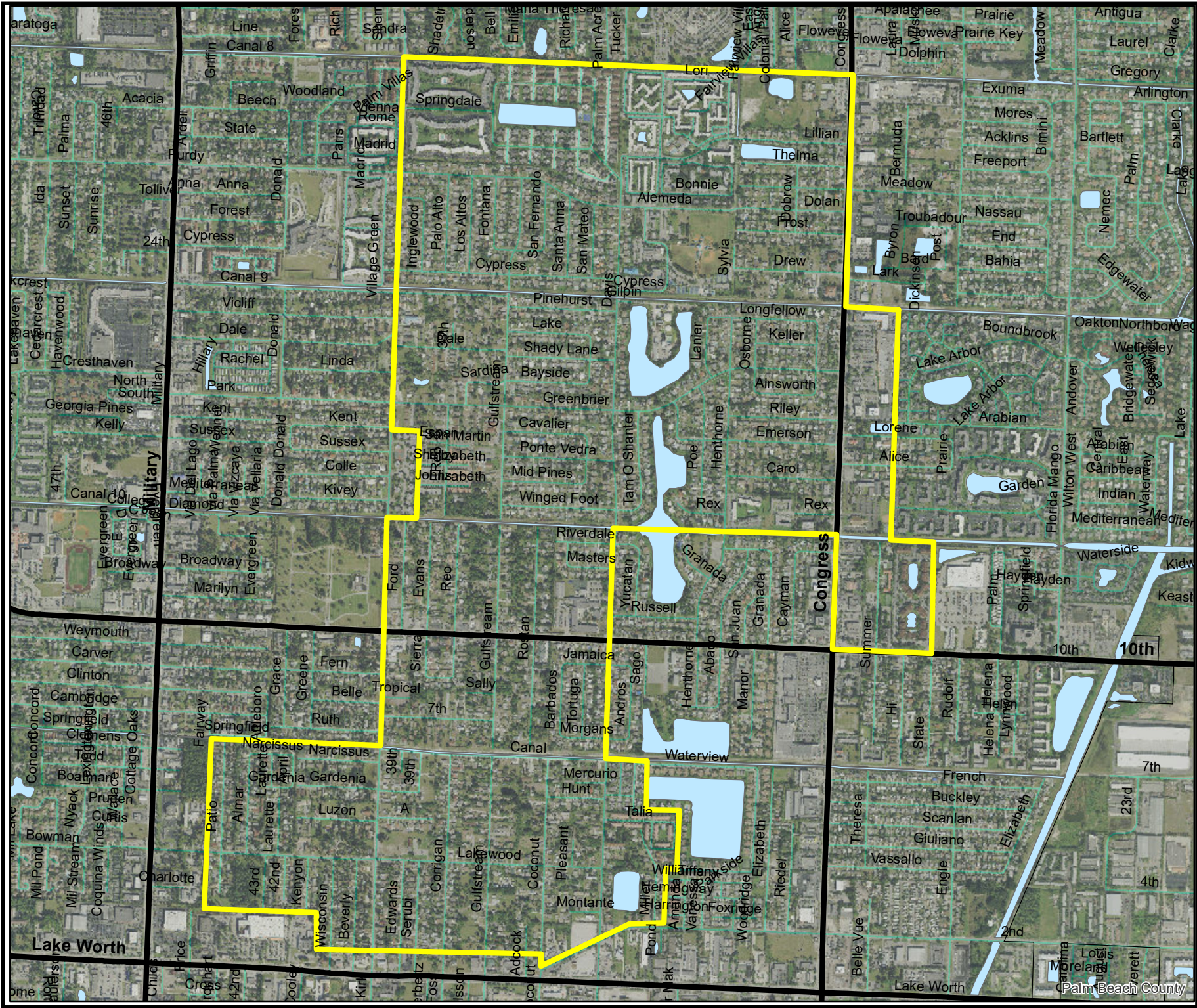




# Palm Beach County

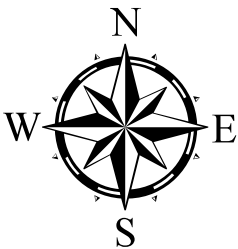
## Community Development Block Grant Program

### Village of Palm Springs - CDBG Target Area



#### Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads

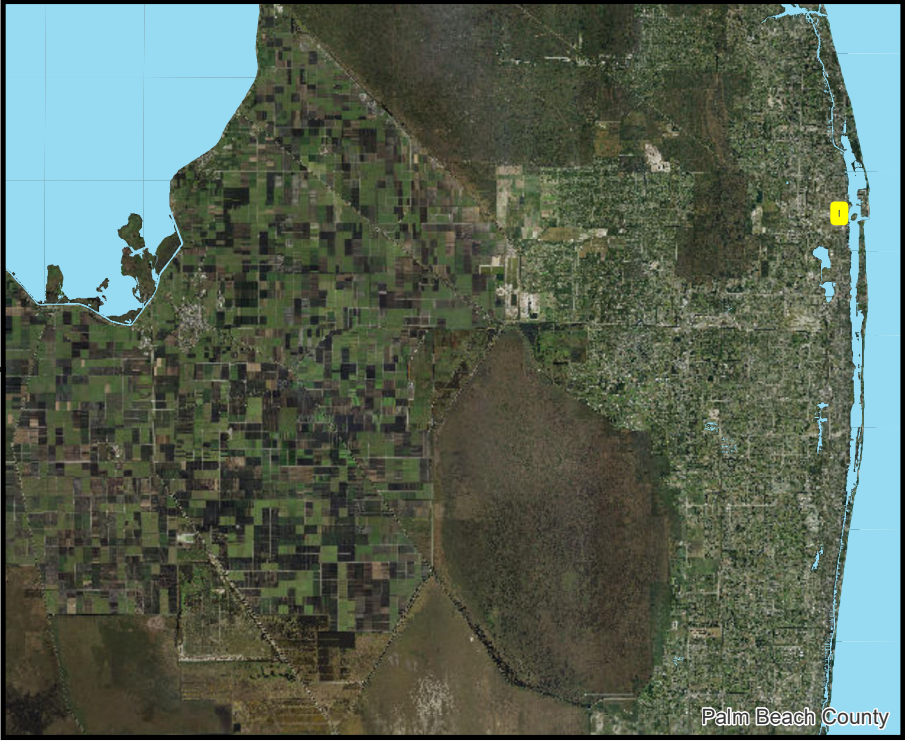
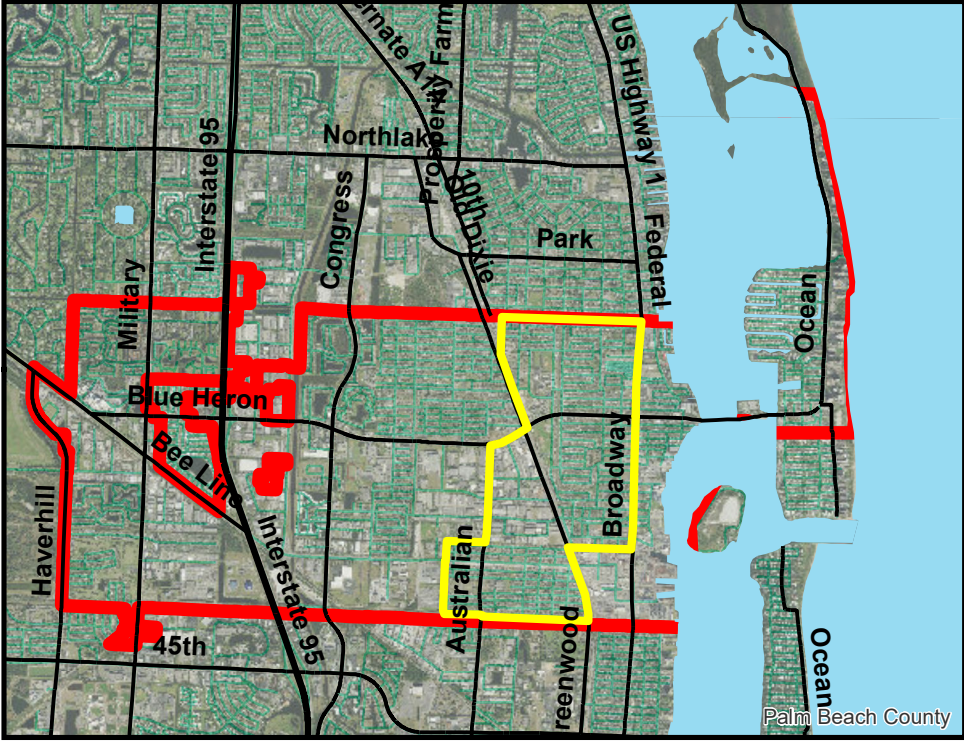
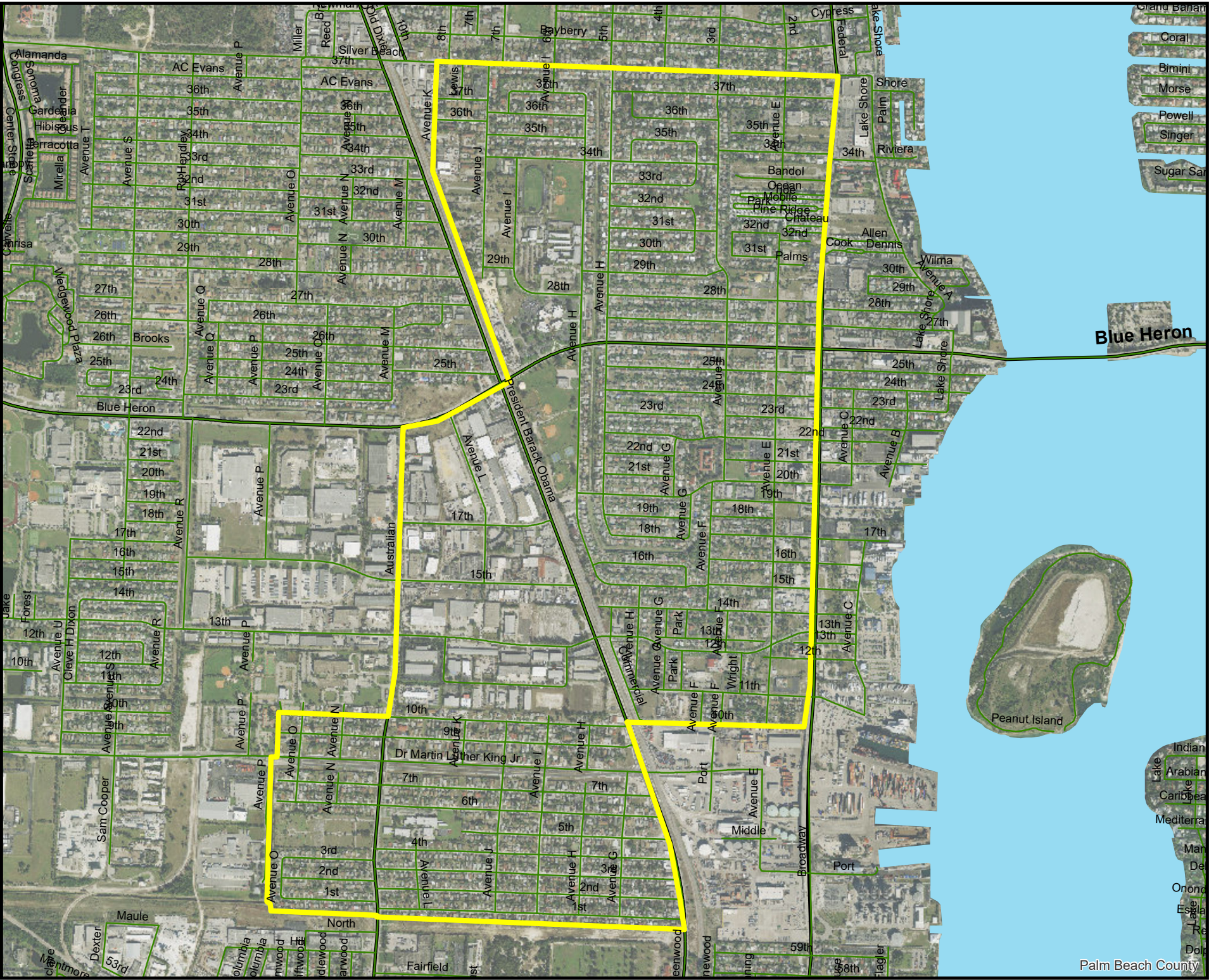


Source: 2011-2015 American Community Survey (Low/Mod Income)  
Prepared by PBC Department of Housing and Economic Development - June 2021





# Palm Beach County Community Development Block Grant Program City of Riviera Beach - CDBG Target Area



### Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads

Department of Housing & Economic Development

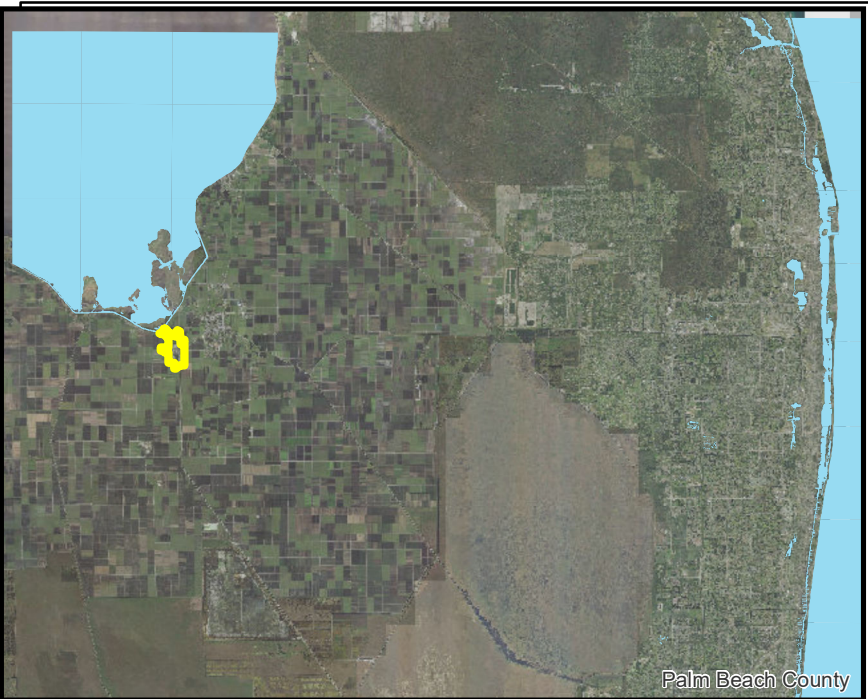
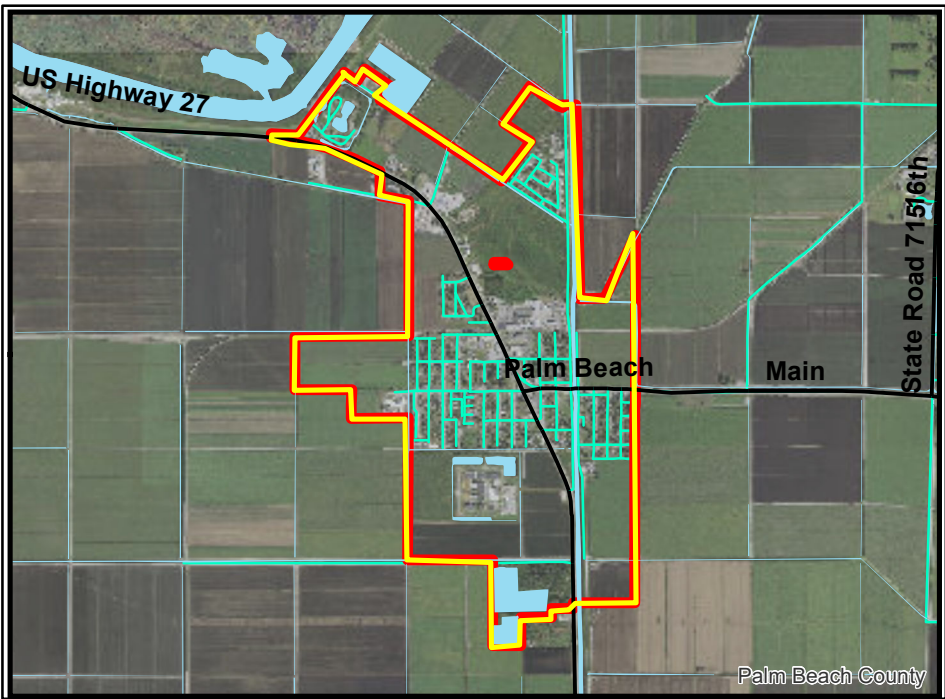
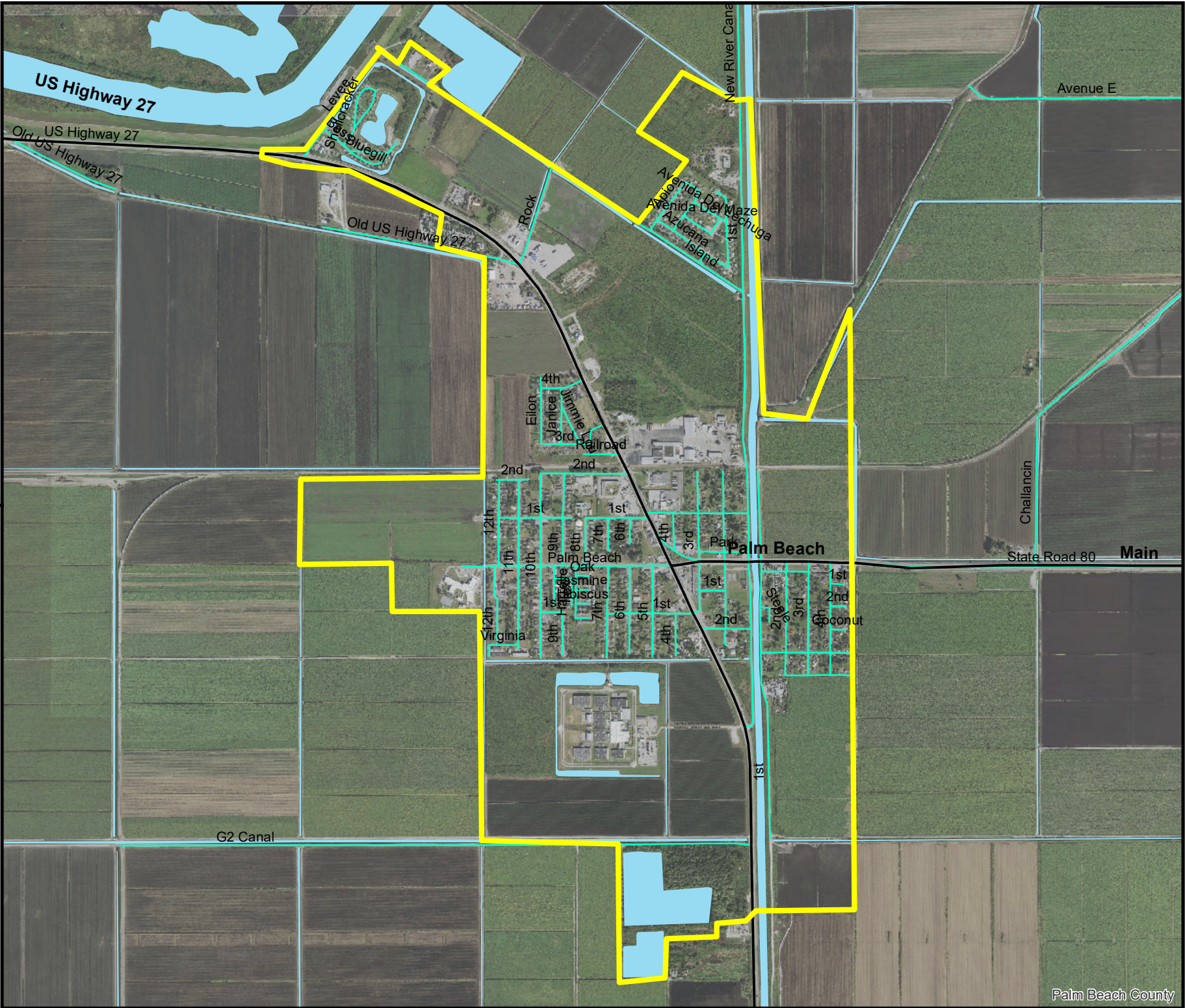
Source: 2011-2015 American Community Survey (Low/Mod Income)

Prepared by PBC Department of Housing and Economic Development - June 2021



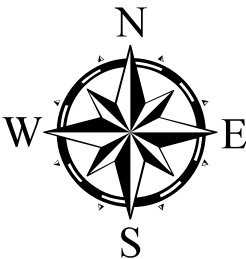


Palm Beach County  
Community Development Block Grant Program  
City of South Bay - CDBG Target Area



Legend

- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



Source: 2011-2015 American Community Survey (Low/Mod Income)

Prepared by PBC Department of Housing and Economic Development - June 2021



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

In accordance with Palm Beach County's Consolidated Plan, the assignment of housing priorities is based on the County's housing needs assessment and market analysis and census data. These priorities include increasing the supply of affordable housing, expanding rental and homeownership opportunities, rehabilitating existing housing stock, and homelessness prevention.

One Year Goals for the Number of Households to be Supported by Population	
Homeless	112
Non-Homeless	750
Special-Needs	0
<b>Total</b>	<b>862</b>

One Year Goals for the Number of Households Supported Through Programs	
Rental Assistance	112
The Production of New Units	304
Rehab of Existing Units	359
Acquisition of Existing Units	87
<b>Total</b>	<b>862</b>

#### Discussion

It is anticipated that a total of 862 eligible households will be provided with affordable housing assistance during FY 2022-2023. One hundred sixty-one (161) owner households are expected to receive assistance via acquisition of new or existing units, rehabilitation/replacement of owner housing units, foreclosure prevention or mortgage assistance. It is estimated that seven hundred and one (701) renter households will receive assistance through the creation of new rental units, rehabilitation of existing rental units, or rental assistance programs targeting homeless prevention/intervention. Homeless persons/households will be provided assistance through the ESG Rapid Re-housing Program. A summary of each project is shown on the following page:

<b>Project-Federal</b>	<b>Activity Owner</b>	<b>Projected Funding</b>	<b># Assisted</b>
CHDO Set-Aside (HOME)	Affordable Owner – New Construction	\$540,793	4
Purchase Assistance	Affordable Owner - Acquisition	\$892,774	9
<b>Owner Federal Total:</b>		<b>\$1,433,567</b>	<b>13</b>
<b>Project-State</b>	<b>Activity-Owner</b>	<b>Projected Funding</b>	<b># Assisted</b>
Purchase Assistance (SHIP)	Affordable Owner- Acquisition	\$2,100,000	21
Owner Occupied Housing Rehabilitation (SHIP)	Affordable Owner- Rehabilitation	\$3,000,000	30
Emergency Repair (SHIP)	Affordable Owner - Rehabilitation	\$1,500,000	30
Foreclosure Prevention (SHIP)	Affordable Owner – Acquisition	\$547,615	27
Single Family New Construction (SHIP)	Affordable Owner – New Construction	\$1,000,000	10
<b>Owner State Total:</b>		<b>\$8,147,615</b>	<b>118</b>
<b>Project-Local</b>	<b>Activity-Owner</b>	<b>Projected Funding</b>	<b># Assisted</b>
Housing Finance Authority (Bond Program)	Affordable Owner – Acquisition	\$7,000,000	30
<b>Owner Local Total:</b>		<b>\$7,000,000</b>	<b>30</b>
<b>Overall Owner Total:</b>		<b>\$16,581,182</b>	<b>161</b>
<b>Project-Federal</b>	<b>Activity-Rental</b>	<b>Projected Funding</b>	<b># Assisted</b>
Adopt-A-Family (ESG)	Rapid Re-housing Homeless - Rental Assistance	\$183,762	112
Rental Housing Development (HOME)	Affordable Rental – New Construction	\$1,000,000	20
<b>Renter Federal Total:</b>		<b>\$1,183,762</b>	<b>132</b>
<b>Project-State</b>	<b>Activity-Rental</b>	<b>\$1,000,000</b>	<b># Assisted</b>
Developer Assistance Rental Housing (SHIP)	Affordable Rental – New Construction/Rehabilitation	\$1,000,000	13
<b>Renter State Total:</b>		<b>\$1,000,000</b>	<b>13</b>
<b>Project-Local</b>	<b>Activity-Rental</b>	<b>Projected Funding</b>	<b># Assisted</b>
Housing Finance Authority (Bond Program)	Affordable Rental – New Construction & Rehabilitation	\$80,000,000	556
<b>Rental Local Total:</b>		<b>\$80,000,000</b>	<b>556</b>
<b>Overall Renter Total:</b>		<b>\$82,183,762</b>	<b>701</b>
<b>TOTAL OWNER AND RENTER</b>		<b>\$98,764,944</b>	<b>862</b>

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Palm Beach County (PBC) has seven (7) housing authorities operating within its boundaries. Only four (4) operate within PBC Urban County Program Jurisdiction and of these, the Riviera Beach Housing Authority (RBHA) has neither public housing nor vouchers and the Belle Glade Housing Authority operates under the auspices of the US Department of Agriculture. This section will focus on the two remaining Housing Authorities, namely the Pahokee Housing Authority (PHA) and Palm Beach County Housing Authority (PBCHA). Together these two entities operate a total of 902 HUD supported public housing units, and 164 authority owned units. They also administer a combined 3,025 housing choice vouchers and 285 “other” vouchers. Each Housing Authority provides affordable housing to extremely low, low, and moderate income families.

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

Each housing authority plans to strategically address the most immediate needs of public housing residents and housing choice voucher holders as presented below:

#### **Pahokee Housing Authority (PHA):**

- Continue to engage in development activities to expand the supply of affordable housing for low-income families by seeking public and private partnerships and leveraging its resources
- Develop the eight (8) acre property formerly the L.L. Stuckey Homes
- Continue to work through converting at least 20% of its existing Section 8 Tenant Based Vouchers (TBV) to Project Based Vouchers (PBV), and partnering with neighboring housing authorities to administer PHA’s TBV program in exchange for placement of PBV, subject to HUD’s approval
- Convene discussions regarding the viability of the Authority with key stakeholders applying for the Choice Neighborhood Planning Grant
- Continue to provide voucher mobility counseling to participants in effort to locate housing of their choice in areas of low poverty
- Requested waivers from HUD, to increase Small Area Fair Market Rent (SAFMR) to 120% in zip code areas where families are paying more than 40% of their adjusted income for rent
- Engaging landlords and realtors to better understand their challenges and ensure affordable housing options for participants and partnering with neighboring housing authorities to share data, when possible
- Participate in meetings with alliances, such as Palm Beach County Continuum of Care and Community Partner’s Inc., to identify additional funding to expand affordable housing opportunities, repairs, and support to low-income families.

- Partnered with Palm Beach County Sheriff Office (PBSO) Community Policing deputies to address affective strategies on crime awareness and prevention
- Partner with FPL to provide energy savings tips and resources to help residents lower their utility bills
- Applied for funding from HUD to reestablish its Resident Opportunity and Self-Sufficiency (ROSS) Program through which, residents will be able to increase their incomes, reduce or eliminate the need for public assistance, and achieve economic independence.
- Identify employment opportunities for tenants that provide skill-building opportunities and work with contractors who receive federally funded contracts, and encourage the hiring of Section 3 participants

**Palm Beach County Housing Authority (PBCHA):**

- Continue to evaluate its PH and HCV program utilization to maximize funding and utilize 100% of its vouchers and occupancy of its 428 LIPH units
- Annually review its portfolio and utilize all available resources to increase density and develop new, affordable housing units.
- Continue to utilize Resident Services staff and funding through its Family Self-Sufficiency (FSS), ROSS, and Jobs Plus Initiative grants to provide supportive services, and enable assisted families to increase their earned income and become economically self-sufficient.
- Continue to support low-income residents within its program and throughout Palm Beach County with applying for rent, utility, and relocation assistance through the County's Emergency Rental Assistance Program (ERA) and Our Florida.
- Continue to apply for additional funding for its PH programs to effectively operate, maintain and make capital improvements; make cost effective, energy-efficient, green improvements; and address health safety and security threats that pose a risk to PH residents.
- Continue to administer and/or pursue additional vouchers to serve survivors of domestic violence, homeless or at risk of homelessness; non-elderly people with disabilities; homeless veterans; families who lack adequate housing; and youth who have left foster care.

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

The public housing authorities plan to undertake the following actions:

**Pahokee Housing Authority (PHA):**

Encourage residents to participate in PHA Board Meetings, tenant meetings and policy development. Continue to engage its active Resident Advisory Board (RAB) in in setting goals and objectives during the Agency/Annual Plan planning process. PHA will continue collaborating with agencies to provide training geared to consumers interested in learning more

about the “First Time”, homebuyer programs and process. The training workshops will cover, credit counseling, budgeting and alike. PHA will explore its capacity to establish an HCV Homeownership Program during 2022-2023.

**Palm Beach County Housing Authority (PBCHA):**

PBCHA will continue seeking to have a Resident Board Member who is directly assisted under the housing authority’s public housing or HCV programs, and who participates in decision making and management of their programs. PBCHA will continue to support the creation of a Resident Advisory Board (RAB) and/or Residents Councils to assist and make recommendations on the PBCHA annual plan, Capital 5-YR action plan, and to develop and implement goals, needs, strategies and priorities of the PBCHA. The PBCHA will adopt rent policies and assess programs that support and encourage employment by partnering with local and regional partners. The Authority will continue providing tools and resources for job skills development and training, and plans to increase participation of the FSS, Jobs Plus and ROSS programs for public housing and FSS for housing choice voucher program participants

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

**Pahokee Housing Authority (PHA)**

PAH is designated as a “High Performer” agency in both its Public Housing and Section 8 HVC programs.

**Palm Beach County Housing Authority (PBCHA)**

PBCHA’s Low Income Public Housing (LIPH) program is designated as a standard performer. It’s Housing Choice Voucher (HCV) program has remained self-designated as troubled and not been reassessed due to COVID and continuing waivers adopted by the PBCHA through December 31, 2022.

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

### **Introduction**

Palm Beach County is dedicated to improving housing opportunities of all its residents including the homeless population, those threatened with homelessness, and those with special needs. Government and non-profit agencies will continue to provide facilities and support services to meet the immediate needs of homeless individuals/families, to help prevent individuals and families from becoming homeless and to provide assistance to persons with special needs. In its Five Year Consolidated Plan, Palm Beach County stated that the funds that are reasonably expected to be made available to the County for homeless programs would be utilized to assist the homeless population, those with special needs and to assist in the implementation of Leading the Way Home: Palm Beach County's Plan to End the Cycle of Homelessness

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

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

Palm Beach County and its partners will utilize various avenues to provide outreach to the homeless population, including those persons that are unsheltered. The County's outreach efforts include initially assessing homeless individuals/family's needs in order to provide the appropriate housing and supportive services referrals. The Service Prioritization Decision Assistance Tool (SPDAT) is the assessment tool used during outreach activities. The tool prioritizes whom to serve and identifies what supportive services should be provided. The County plans to assist approximately 1,500 unsheltered persons with referrals during FY 2022-2023 through the following actions:

- Palm Beach County's Homeless Outreach Team (HOT), which leads the County's homeless outreach program, will continue to utilize the SPDAT to conduct initial assessments in the field. The individual's SPDAT scores will be used to determine what programs and services are the most needed by the homeless individual. The HOT Team will continue to travel throughout the County to various location where the homeless are known to congregate in order to conduct on-site screenings.
- The Homeless Coalition of Palm Beach County will coordinate Homeless Connect events throughout the County during FY 2022-2023. These events allow the homeless population to receive haircuts, toiletries, clothing and other related items. At select Homeless Connects, homeless persons will also be provided with the opportunity obtain state-issued identification cards. It is estimated that over 400 homeless persons will attend the various Homeless Connect events.
- The Senator Phillip D. Lewis Center will continue to be the main point of access for the homeless population to obtain housing and/or services in Palm Beach County.



Community Development Block Grant (CDBG) funds will be utilized to fund a portion of the facility's operational costs. Homeless individuals and families will continue to be referred to the Lewis Center from the County's Homeless Outreach Team as well as law enforcement.

- The County will continue to operate the Belle Glade Assessment and Intake Center in western Palm Beach County. The Center will be the point of coordinated entry into the homeless system of care for residents living in the western portion of the county. Homeless persons and families will be referred to the Center by the County's Outreach Team and by law enforcement.
- The County will continue its efforts in establishing a second homeless resource center. A site has been secured and predevelopment actions are underway. The second facility, when completed, will have seventy (70) emergency beds and fourteen (14) temporary beds and will operate in the same manner as the Lewis Center. The new facility will also serve as a point of entry for the homeless population to access services. The new facility is expected to be completed in late 2023.
- The Homeless Coalition will continue to offer Warm Welcome Kits to any homeless person that comes through the Lewis Center regardless if they receive assistance or not. This program provides the individuals a cloth tote bag or backpack filled with necessities and comforts to make the transition from homeless to home less stressful. These items include, among others, shirt, socks, soap, shampoo, toothbrush and toothpaste.
- Palm Beach County will observe National Hunger and Homeless Awareness 2022 (November 12-19, 2022). The County will sponsor multiple events during this week to include several outreach and educational activities.

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

The County will continue to provide funding (both federal and non-federal) for the operation and maintenance of local emergency shelters and transitional housing facilities and for the provision of supportive services to homeless persons. During the upcoming fiscal year, the County will provide shelter and support services to the homeless population through the following:

- Palm Beach County will utilize Financially Assisted Agencies (FAA) funding to support emergency shelters and transitional housing facilities owned and operated by non-profit agencies. These facilities will provide shelter and services to homeless single women and men as well as homeless families. FAA funding will also be used to support shelter facilities that house victims of domestic abuse.
- The County will continue to use CDBG dollars to support the operation of two (2) county-owned emergency shelters. The Lewis Center will provide shelter and supportive services to homeless individuals and the Program REACH facility will provide shelter and support services to homeless families with children. It is anticipated that during the upcoming fiscal year 2000 homeless individuals and 240 homeless families will receive services from

these two shelters.

- The County's Homeless and Housing Alliance (HHA) will continue to prioritize the emergency shelter component for the County's ESG program.
- Palm Beach County will provide ESG funding to support a transitional housing facility for single homeless men and two shelters for victims of domestic abuse.
- The County will continue to provide CDBG funding to support housing facilities that provide shelter and supportive services to domestic violence victims and to abused, neglected and abandoned children.
- A transitional housing project that provides shelter and life skills training to unaccompanied youth who have aged out of the state's foster care system will be supported by CDBG funding.
- The County is continuing its partnership with a local housing authority to construct and operate approximately 22 cottage homes. These cottage homes will be operated as a transitional rental housing facility. The cottages will serve homeless families with children under the age of 18.
- Palm Beach County's Parks to Work initiative will continue providing opportunities for homeless persons to get back to work and into housing. Participants clear trash and debris from local county parks in exchange for a day's wage, supportive services and nightly shelter.
- Palm Beach County will continue to operate a temporary emergency homeless shelter, the Lewis Center Annex. This shelter will provide beds, showers, meals, medical services and other supportive services for up to 125 chronically homeless persons until the County's second Homeless Resource Center is operational.
- The County will support the operations of the Homeless Intake/Assessment Center in Belle Glade for the western portion of the County. The center has administrative offices that house intake specialists as well as outreach workers. The Center also has six units that house homeless individuals temporarily while they are awaiting placement in an emergency or transitional facility.
- Palm Beach County has established the Lake Villages at the Glades a 40-unit facility in Pahokee to provide shelter to the homeless who primarily reside in the western communities. Of the 40 units, 18 units have been classified as emergency shelter for families, seniors and individuals.

**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**

Palm Beach County will continue to assist homeless individuals and families to transition into permanent supportive and independent housing. The following actions will be undertaken by the County and its partners to help the homeless population transition into a permanent form of housing:

- The County will continue to utilize Continuum of Care (CoC) and ESG funding to support three (3) Rapid Rehousing programs. These programs will provide financial assistance to homeless individuals/families to regain stability in permanent housing. The financial assistance will include security deposits, rental assistance, utility deposits and utility assistance. These households will also continue to receive case management and other supportive services.
- Palm Beach County will allocate FAA funding to assist with the operational costs of permanent supportive housing programs that assists individuals and families.
- The Homeless and Housing Alliance (HHA) has set as a goal for the Continuum to give funding priority to permanent supportive housing programs that dedicate 100% of their beds for the chronically homeless. This priority will be achieved by awarding maximum points during the grant review process.
- 18 units of the County's Pahokee 40 unit facility are earmarked for supportive housing for families, seniors and individuals.
- The County's CoC funding will continue to support permanent supportive housing programs that dedicate 100% of their beds for the chronic homeless population. These programs provide housing and support services to individuals as well to families.
- The County will continue the SMART (Support, Marketing, Assistance, Rental, Tenant) campaign which recruits potential landlords to a database to match them with homeless individuals and families who are in need of housing. Persons housed under this program are provided with deposits and monthly rental assistance which vary in length and dollar amounts based on the client's needs. Each household is assigned a case manager who in turn becomes the landlord's point of contact.

**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.**

Palm Beach County will continue to use local, state and federal funding to support Homeless Prevention activities that are designed to assist low-income persons and families that find themselves threatened with homelessness. The following actions will be undertaken by the

County to assist individuals and families that are at risk of becoming homeless:

- Palm Beach County will continue to provide financial assistance in the form of emergency rent and/or utility payments to households in order to prevent the household from becoming homeless. Homeless prevention funds target those individuals and families who would become homeless without the assistance.
- The County will continue to financially support a Traveler's Aid Program. This program provides relocation assistance to homeless families/individuals who find themselves stranded in Palm Beach County. This assistance will be in the form of a one-way bus ticket that will allow the homeless person(s) to return to a support system outside of Palm Beach County.
- The County will continue to participate in the Reentry Task Force whose mission is to implement comprehensive re-entry services to ex-offenders from the time of their entry into the prison system through their transition, reintegration and aftercare in the community. These services will include, among others, case management and housing assistance. The Reentry Task Force partners include Palm Beach County, Criminal Justice Commission and Gulfstream Goodwill Industries.
- The County will continue to make funding available to agencies that provide housing and support services to youth who have been discharged from the state's foster care program. Moreover, the County provides CoC funding to support the "Connecting Youth to Opportunities" program that provides rapid re-housing and support services to unaccompanied youth ages 18 to 24 who have aged out of the foster care system.
- Palm Beach County Sheriff's Office will continue to coordinate with the County's Division of Human and Veterans Services to support a discharge process that allows persons who were homeless prior to being incarcerated to participate in the Continuum of Care's homeless service programs. Before being released from jail, staff from the County's Homeless Outreach Team meets with the inmate to complete an assessment and arrange for emergency shelter upon release from the correctional facility.
- The Lewis Center will continue to coordinate with area hospitals and mental health facilities to permit discharged patients to receive referrals to the Lewis Center. The referrals will allow for the discharged persons to access the County's homeless services.
- The County's Division of Human and Veterans Services will continue to have oversight of HUD's Youth Homeless Demonstration Program (YHDP). The County awarded 3 nonprofit agencies funding under this program to provide eligible activities that serve youth experiencing homeless, including unaccompanied and pregnant or parenting youth, where no member of the household is older than 24 years of age. These activities are funded for two years (October 2020 through September 2022) and have been renewed

for an additional year.

### **Discussion**

Palm Beach County does address the needs of persons who are not homeless but do require supportive services to maintain a functional life. Many of the supportive services for the special needs population are currently addressed through various county supported programs. The elderly population and senior citizen activities are assisted through the county's many social service programs. Many of the senior activities are facilitated by the Area Agency on Aging of Palm Beach and the Treasure Coast as well as the County's Senior Services Division. Special needs services that are not directly provided by the county such as housing for persons with HIV/AIDS, foster care programs, mental health disorders and substance abuse are addressed by the County through coordination with a network of social service providers and through funding via CDBG, ESG and general revenue dollars to non-profit agencies to assist in the provision of those services. The County also participates in the County's Special Needs Advisory Coalition (SNAC). The Coalition's mission is to provide a comprehensive, integrated system of care that supports and connects individuals with special needs and disabilities and their families to community-based services and opportunities.

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

### **Introduction:**

Palm Beach County (PBC) continues to implement strategies to remove barriers to affordable housing, whether such barriers are posed by public policies, conditions in the local housing market, or the economic climate. The County's strategies are designed to close the affordability gap, increase the supply of affordable housing, and ensure opportunity for access to affordable housing.

### **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**

Public policies of PBC are intended to remove barriers to affordable housing. The County, in its quest to promote affordable housing and to remove identifiable barriers to affordable housing, will continue to implement the following strategies:

- The County's Workforce Housing Program (WHP) and Affordable Housing Program (AHP) provide opportunities to developers to increase density up to 100 percent in accordance with the ULDC. PBC Planning, Zoning, and Building (PZB) are considering adoption of a more flexible zoning as it relates to alternative PDRs community-wide, including an approval process designed to develop a flexible self-regulating development order.
- County land development regulations allow for Zero Lot Line Developments which utilize less land to develop housing and thereby reduces its cost.
- Accessory Affordable Housing in the "Institutional and Public Facilities" Land Use Category provides non-profits and other community based organizations a means to develop very-low and/or low-income housing on land that has been set aside for public and/or governmental use but ordinarily has no specific residential density. This provision is important to special needs housing production since most often non-profits or community based groups with institutional land look to include special needs housing in conjunction with non-residential facilities (i.e., church site with elderly housing).
- PZB implements a mandatory Workforce Housing Program (WHP). The WHP requires the provision of workforce (60 – 140% AMI) units in all new housing developments of 10 or more units located in the unincorporated county. Development of the required workforce units is facilitated by certain incentives including density bonuses up to 100% and flexibility to traffic standards to allow for up to 30% greater volume on affected roadway segments.
- County owned surplus properties: if suitable for housing development, identified properties may be awarded to private not-for-profit organizations, or to local housing

authorities and funding provided from the Infrastructure Sales Tax (IST) to construct housing for L/M income families.

- PZB will implement a voluntary Affordable Housing Program (AHP) which stimulates the development of affordable units (<60% AMI) in all new developments of 10 or more units located in the unincorporated county. The AHP requires 65% of total project units to be affordable in exchange for density bonuses incentives.
- PZB's One-Stop Permit Process lessens the time required for developers to acquire necessary building permits, reducing interest costs to developers of affordable housing.
- The County's Impact Fee Ordinance will minimize impact fees for new development of smaller, more affordable homes, by calculating impact fees on the total square footage of the home.
- DHED implements the Impact Fee Affordable Housing Assistance Program, which utilizes investment earnings from impact fees collected on roads, parks, and public building to offset impact fees on the development of affordable housing projects for households at or below 140% of Area Median Income.
- The Palm Beach County Commission on Affordable Housing (CAH) makes policy recommendations regarding the development of affordable housing.
- The County Engineer's Municipal Services Taxing Unit Program provides paving and drainage improvements throughout the unincorporated county. The program will help maintain housing affordability by allowing assessments for such infrastructure improvements to be paid over a period of 20 years to reduce the financial impact on property owners.
- The PBC Water Utilities Department's Deferred Payment Program will reduce the financial impact on property owners of assessments levied for installation of public water and sewer systems within its service area. This program will allow assessments to be paid back over a period of 20 years with an annual interest rate of 5.5%.
- The PBC Property Appraiser's Office will administer property tax exemptions which contribute to housing affordability, including:
  - Homestead Exemption
  - Active Military Service Exemption
  - Civilian Disability Exemptions
  - Disabled Veterans Exemption
  - Senior Exemption
  - Quadriplegic Exemption
  - Granny Flats Exemption
  - Legally Blind Exemption
  - Widow/Widower Exemption
  - Institutional Exemption

All of the listed exemptions contribute to affordability of housing by lowering the annual property tax burden. Additionally, the Portability Exemption allows homeowners which are relocating to transfer their existing homestead exemption to their new primary residence. This enhances

fluidity in the housing market and increases the supply of existing for-sale housing thereby mitigating supply side price pressures.

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## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Palm Beach County is active in devising strategies to address the needs of low and moderate-income persons, homeless families, and underserved populations. The majority of the plans and strategies mentioned in the sections below are direct County actions, implemented in collaboration with the non-profit community, municipalities, and interested partner agencies.

### **Actions planned to address obstacles to meeting underserved needs**

During FY 2022-2023, Palm Beach County plans to undertake the following actions to address underserved needs:

- Provide access to affordable housing to extremely-low, low, and moderate-income families through the new construction or rehabilitation of rental units for these income groups, provision of rental assistance to eligible renters and by providing second mortgages at affordable rates to enable homeownership. This strategy will continue under the HOME, SHIP, and WHP programs.
- Promote cooperation between agencies by participating in the Homeless Coalition, Homeless and Housing Alliance, Countywide Community Revitalization Team, Affordable Housing Collaboration, Housing Leadership Council, Special Needs Advisory Coalition, and the Homeless Advisory Board, among others.
- Provide financial support to non-profit and publicly operated entities that support homeless individuals and families, and other members of underprivileged communities.
- Promote the development of vocational, on-the-job training, apprenticeship and entrepreneurial programs for unskilled residents to help them secure employment and business opportunities.
- Request new funding from Federal and/or State sources to better focus on the underserved needs of the County, and will support funding applications from other entities within its jurisdiction.
- Initiate construction of a second Housing Resource Center with funding provided by CDBG and the 1% Infrastructure Sales Tax (IST).
- Address infrastructure deficiencies in low-and moderate-income areas (including identified CDBG Target Areas) through funding under the CDBG Program and the IST.
- Provide financial assistance to businesses under the Section 108 and other County Loan Programs in exchange for creating or retaining jobs to be held by low and moderate-income individuals, with special focus in the Glades Region; and lead economic development efforts in the Glades Region in order to improve economic and housing conditions for local residents.
- Promote tax incentive opportunities for businesses creating jobs in the County's high

crime areas under the state designated Urban (high crime) Job Tax Credit Program.

- Collaborate with CareerSource to provide effective and coordinated employment services through career assessments, training and employment assistance to County residents.
- Support countywide agencies such as the Black Business Investment Corporation and business incubators to assist in the development of small businesses for low and moderate-income persons.
- Provide utility assistance to low-income residents under the State of Florida's Low Income Home Energy Assistance Program (LIHEAP) through the Department of Community Services.
- Encourage private investment/development in the County's designated low-income census tracts under the Federal Opportunity Zone Program.

### **Actions planned to foster and maintain affordable housing**

During FY 2022-2023, Palm Beach County will continue to undertake efforts to foster and maintain the supply of affordable housing for very-low, low, moderate, and middle-income (0 – 140% AMI) for residents of the County. The County's planned action include:

- Utilization of SHIP funds for the Foreclosure Prevention Program. Funding will be provided as a grant to cover up to four (4) months of assistance including; mortgage payment (PITI), late fees, Condo and HOA fees, special assessments and other foreclosure prevention related expenses.
- Utilization of impact fee investment earnings to support the construction of affordable housing units for developers seeking to build affordable units (For-Sale or For-Rental) or individuals seeking to build owner-constructed/occupied housing units as their principal place of residence.
- Financing the purchase and/or rehabilitation of single-family homes for owner occupancy through first and second mortgages, and down payment or closing cost assistance under the SHIP and HOME Programs.
- Providing HOME Program funds to certified Community Housing Development Organizations (CHDOs) for the acquisition, rehabilitation, and new construction of single-family housing for ownership and single-family or multi-family housing for rental.
- Continuing the mandatory orientation, in-take, process and subsidies to ensure occupancy for all Workforce Housing units.
- Utilizing HOME and SHIP funding to leverage non-federal and private housing investments to develop rental housing in the local community.
- Continuing the issuance of bonds for single and multi-family housing for moderate, middle and lesser income persons and families through the County's Housing Finance Authority.
- Assisting very-low income households to obtain rental housing by providing SHIP funding for first/last months' rent and security deposits.

- Utilizing SHIP funding to acquire, rehabilitate, and improve housing for veterans and other special needs households.
- Ensuring that affordable housing subsidized by the County remains affordable for a prescribed period through deed restrictions and monitoring.
- Continue evaluation of policies and programs that impede affordable and workforce housing pursuant to FL §420.9076.
- Implementing the Planning, Zoning, and Building Department's Workforce Housing Program, which mandates that housing units in new residential development be provided for households with incomes between 60% and 140% of AMI. The program also provides a density bonus incentive to developers to increase the number of total units in a new development based on the percentage of workforce housing units.
- Implementing the PZB Affordable Housing Program, whereby developers of new residential developments may receive certain incentives in order to provide affordable housing units to <60% AMI households.
- Ensuring that Green Building and Energy Saving products and processes are used in affordable housing construction when funding assistance is provided by the County.

#### **Actions planned to reduce lead-based paint hazards**

DHED provides financial assistance through federal funded programs for the acquisition and/or rehabilitation of homes to eligible low and moderate- income first time homebuyers and homeowners.

All residential units constructed prior to 1978 and slated for acquisition and/or rehabilitation, must undergo an inspection for lead-based paint prior to the initiation of the action. If lead-based paint is identified it will be assessed and abated, and the homeowner may be provided with relocation expenses for the period of the abatement. DHED will keep on file all results of lead-based paint inspections and abatements in order to comply with applicable regulations. HED will require lead-based paint inspections of commercial buildings built prior to 1978, if the buildings will be used by children.

HUD regulation 24 CFR Part 35, entitled "Lead-Based Paint Poisoning Prevention in Certain Residential Structures" requires that lead-based paint (LBP) hazards be controlled before the rehabilitation of a housing unit that is financially assisted by the federal government or being sold by the government, particularly if young children (ages 6 and under) will be occupying the unit. In Florida, Medicaid eligible children, regardless of whether coverage is funded, are required to receive blood lead screening tests at ages 12 months and 24 months. Any child between 24 and 72 months with no record of previous blood lead screening test must receive one. All blood lead test results must be reported to the Florida Department of Health. The Center for Disease Control

(CDC) currently recommends that a child's blood level equal to 5 µg/dL be reported to parents. No safe blood level in children has been identified and prevention of lead exposure before it occurs is recommended. The Florida Health Bureau of Environmental Toxicology and Florida Health PBC are the two agencies responsible for monitoring lead hazard exposures within Palm Beach County. Some of the actions to be undertaken by Florida Health PBC to address and/or reduce lead-based paint hazards include:

- Promote lead hazard remediation efforts by providing families, communities, and professionals with knowledge and technical assistance regarding lead-based paint testing and abatement programs.
- Coordinate lead source identification with appropriate departments and organizations in the County to ensure the guidelines for lead reductions are consistent with the rehabilitation programs and codes.
- Ensure at-risk children are screened for lead poisoning and establish working relationships with stakeholders in the community who can help implement a county-wide elimination plan.
- Promote awareness about the Florida Department of Health Lead Alert Network and Consumer Product Safety Commission which disseminate information about lead hazards, folk medicine, imported candies, recalled toys and other children's products.

### **Actions planned to reduce the number of poverty-level families**

According to the 2020 Census, some 11.6% of Palm Beach County's population lives below the federal poverty level. Also, the census revealed that 16.5% of all children in the /county, under the age of 18 years lives below the federal poverty level. The County is insistent in reducing this percentage and has therefore implemented a number of measures to address this situation. Broadly, these include implementing or supporting the implementation of family stabilization programs, employment related supportive services, creating economic opportunities, and the provision of affordable housing.

The County's planned action to reduce the number of poverty-level families are as follow:

- Advocate for services and funding to address self-sufficiency and economic stability.
- Provide opportunities by combining, organizing and adjusting the available resources so that programs are tailored to the needs of low-income people and communities.
- Collect and analyze data from information systems and other qualitative means in order to assess the economic needs of persons living below the poverty level.
- Coordinate and share data with other organizations that plan and develop economic growth and job training.
- Assist migrant and seasonal workers to learn new employment skills by providing basic job

skills training, job readiness, high school equivalency preparation, counseling and support.

- Provide local matching funds for Title 20 subsidized childcare, providing support to low-income, working parents.
- Assist eligible residents in need, including seniors, veterans and current members of the armed forces to attain optimal independence.
- Implement farm worker programs to provide classroom education, on-the-job training, and job search assistance to farm workers and their families to be able to attain full-time, year around employment.
- Fund the Financially Assisted Agency Program, which provides funding to non-profit agencies to administer health and human service programs.
- Support the Lutheran Services Florida (LSF), a non-profit, to administer the Head Start and children services program which assists low-income preschool children from birth to 5 years.
- Implement a Family Self-Sufficiency Program to assist at-risk families with various educational, health care and other services including economic stability and self-sufficiency services to enable individuals/families to be self-supporting.
- Provide job creation and retention opportunities, particularly in areas with high concentrations of poverty.
- Support and encourage private long-term investment and job creation in the targeted communities designated as Opportunity Zones.
- Support CareerSource Palm Beach County, which operates three full service career centers to provide employer/employment opportunities countywide and an office for employment & training and related services for individuals receiving Supplemental Nutrition Assistance Program and Training Program benefits.
- Use CDBG funds to assist business incubators to provide entrepreneurial expertise to small and micro business enterprises.
- Support the operations of the Senator Phillip D. Lewis Center (homeless resources center), and the Family Emergency Center with CDBG funds.
- Support the Glades Incentive Program to provide incentive payments to contractors and subcontractors for the hiring of new employees residing in the Glades Region.
- Use ESG funds to fund a rapid rehousing program for the prevention of homeless households.
- Use CARES Act Coronavirus Relief Fund dollars to prevent homeowners and renters from evictions

### **Actions planned to develop institutional structures**

Palm Beach County supports a strong institutional structure that ensures the efficient identification and distribution of resources to eligible geographic areas and county residents. The strength of the delivery system is enhanced by the number and variety of private and public organizations within the County that provides housing, homeless services, economic

development, public services and other community development activities such as capital improvements and infrastructure. The County continues to evaluate the operation of each of its community development programs in order to ensure their operation within regulatory requirements, maximize the number of beneficiaries and ensure eligible persons have easy access to these programs.

Communication and coordination between service providers continues to be strongly encouraged to ensure each provider has knowledge of the range of services that are available to their clients. Lack of awareness can hinder the leveraging of resources that could produce more services for county residents.

The County's institutional delivery system does have gaps and weaknesses. Due to the large number of non-profits agencies, developers, public agencies, governments and various special purpose committees, the development and determination of funding priorities may take place in siloes. Also, the expansive land area which comprises Palm Beach County has been identified as an obstacle to the efficient delivery of services especially to western county residents. A lack of available funding to support the County's community development needs can be described as a gap in the institutional delivery system.

During the upcoming fiscal year, the County will undertake the following efforts to continue to:

- Provide funding to businesses, incubators, among others, in order to generate jobs for low to moderate income persons;
- Collaborate with community partners to ensure residents are provided with available supportive services;
- Construct a Homeless Resource Center to serve the southern portions of the County;
- Coordinate with community partners in the preparation of the annual action plan;
- Support workshops and forums which advance affordable housing, economic development, homeless and other special needs issues;
- Provide funding and additional incentives for affordable housing development;
- Provide direct home ownership assistance to low and moderate income families allowing them to qualify for conventional home financing; and
- Certify consistency with the County's Consolidated Plan for any housing-related activity that receives HUD funding for the provision of housing and non-housing activities in the development of viable communities within Palm Beach County.

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

The County recognizes that many families classified as low-and moderate-income, homeless, at risk of becoming homeless, or having special needs oftentimes require assistance in accessing affordable and suitable housing and social services. The County tries to play an active role in

coordinating the delivery of these services to the identified population in such a manner that takes into account a proper assessment of the need, identification of the available resources to address the need and provision of the resources to the targeted population in a manner that is efficient, and equitable. The following summarizes the actions to be undertaken by Palm Beach County to enhance coordination between public and private housing and social service agencies in the implementation of the FY 2022-2023 Action Plan.

#### Coordination with Continuum of Care

Formulation, implementation, and monitoring the overall effectiveness of strategies to address homelessness are primarily done by the local Continuum of Care (CoC). This body is comprised of homeless service providers from all areas of the homeless arena and the lead agency is the Division of Human and Veteran Services (DHVS). It establishes the homeless priorities to be addressed by the County, and recommends funding under the ESG and HUD's Continuum of Care Grant Programs.

#### Coordination with Public and Assisted Housing Providers

The County will continue to coordinate with: the two housing authorities located within its jurisdiction; the three HOME designated CHDOs certified during the year; Housing Leadership Council; Palm Beach County Affordable Housing Collaborative; Treasure Coast Regional Planning Council; and for-profit and not-for-profit affordable housing providers, to increase the supply of affordable housing and identify the neediest households. Cooperation will include collaboration on housing types and strategies to be adopted, financial assistance to affordable housing projects and identification of groups to be prioritized. Two sources of financing homes are the HOME and SHIP programs and are selected via a competitive RFP.

The Commission on Affordable Housing (CAH) review and advise on the County's Local Housing Assistance Plan (LHAP), proposed annual allocation of SHIP funds to the LHAP strategies, and conduct an annual review of County policies, procedures, ordinances, land development regulations, and make recommendations to facilitate affordable housing.

#### Coordination with Health, Mental Health, and Service Agencies

Coordination with the following agencies will continue: Palm Beach County Health Department, as it relates to lead-based paint identification and abatement; Seagull Industries, Coalition for Independent Living Options (CILO), and the ARC, to address disability issues; Legal Aid Society of Palm Beach County, Palm Beach County Office of Equal Opportunity and the Urban League of Palm Beach County to address legal and fair housing problems experienced by low- and moderate-income persons; Redlands Christians Migrant Association, Place of Hope, Children's Place at Home Safe, Vita Nova and the County's Youth Services Department to address issues related to youth and child care.

Economic Development- Actions to Enhance Coordination with Private Industry, Businesses, Developers, and Social Services Agencies.

Palm Beach County provides incentives and funding to businesses under a wide range of programs. These programs are aimed at creating jobs predominantly for low- and moderate-income households and for the revitalization of depressed areas, primarily the Glades Region of the County and other areas designated as Enterprise Zones. The County will continue to use CDBG entitlement funds to fund two business incubators. The Section 108 Loan Program will continue to provide funding to businesses as well as funding obtained from the USDA and allocations from general revenues. Palm Beach County DHED will also continue to work closely with the Business Development Board to attract new businesses to the County.

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## Program Specific Requirements

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

#### Introduction:

For Fiscal Year 2022-2023, Palm Beach County expects to receive funding under the following CPD Programs: CDBG (\$6,492,406); HOME (2,703,963); and ESG (\$577,734). In addition, the County expects to generate \$425,000 in un-programmed program income under CDBG (\$75,000) and HOME (\$350,000). CDBG funds are expected to fund program activities to be implemented by County departments, municipalities and non-profit agencies. The HOME program will fund CHDO activities, the construction or rehabilitation of affordable multi-family housing units and a first time homebuyer program. The ESG Program will fund emergency shelters, rapid re-housing and HMIS.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(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	\$75,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income	\$75,000

#### 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	80%
3. Overall Benefit: A consecutive period used to determine overall benefit of CDBG funds to benefit persons of low- and moderate-income.	2022, 2023, 2024

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

Palm Beach County will not utilize HOME funds in any other form except those stated in Section 92.205(b)(1).

**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:**

Palm Beach County may use HOME funds during FY 2022-2023 for the following homeownership activities: provision of second mortgages to assist with the purchase of a home and construction of new housing. Where full funding is provided for acquisition, the assistance will be in the form of a deferred repayable loan and the price of the unit cannot exceed \$350,000 (95% of the median sale price for a housing unit in Palm Beach County *HUD FHA 2021 Mortgage Limits List*). In order to qualify for assistance, a household must have an income that does not exceed 80% of the median income for Palm Beach County. All assistance will be forgiven at the end of the affordability period.

***Recapture Provision***

The following Recapture Provision will be implemented to ensure the continued affordability of homebuyer units:

Principal Residence: Any home constructed, acquired or rehabilitated for homeownership under the HOME Program must be used as the principal residence of the homebuyer. Upon the sale, transfer, lease, conveyance or alienation of any part or all of the property before the expiration of the affordability period, the County's HOME repayment provisions are triggered and the full amount of the HOME subsidy will be recaptured.

This policy will be applicable to all HOME funded homeownership activities which are administered by HED, CHDOs and/or, Developers. The following chart depicts the required affordability period based on the types and form of the HOME assistance:

Funded Activity	Forms of Assistance	Affordability Period
<ul style="list-style-type: none"><li>Acquisition</li><li>New Construction</li><li>Purchase assistance</li></ul>	<ul style="list-style-type: none"><li>Repayable Loan</li><li>Deferred Loan</li></ul>	<ul style="list-style-type: none"><li>30 Years</li></ul>

Refinance: Mortgage subordinations will only be granted in cases where the homeowner is seeking new financing to: lower the term of the first mortgage; lower the interest rate of the

first mortgage; or make improvements to the HOME assisted property. Should the homeowner refinance for any reason other than those stated above, the full amount of the subsidy provided shall become due and payable in full. Mortgage subordinations will only be granted at the discretion of Palm Beach County.

**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:**

Palm Beach County's Department of Housing and Economic Development (DHED) utilizes the recapture provision for all of its HOME funded housing assistance programs. Recapture provisions encumber the property via a mortgage and promissory note and/or Declaration of Restrictions. If the owner does not maintain compliance with residency and other provisions of the encumbrance, the requirement to repay the County is triggered. If the recapture provision is triggered by a sale (voluntary or involuntary) of the housing unit, the amount recaptured cannot exceed the net proceeds, if any. Net proceeds are defined as the sales price minus repayment of superior loans and any closing costs. The recaptured funding will be HOME program income. The following chart depicts the amount of the repayment due to the County in the event of a violation of the deed restrictions:

Forms of Assistance	Repayment Calculation
Repayable Loan	All unpaid principal and accrued interest due in full
Deferred Loan	Full amount of HOME subsidy

**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:**

During FY 2022-2023 Palm Beach County does not plan to use HOME funds to refinance existing debt.

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

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

The Emergency Solutions Grants (ESG) Program is administered by Palm Beach County Department of Community Services, Division of Human and Veteran Services (DHVS), which coordinates all ESG-funded initiatives to improve the quality of homeless facilities and services available to the County's homeless population. Although ESG monies can be used for a variety of purposes, the Continuum of Care (CoC) in Palm Beach County (PBC), the Homeless and Housing Alliance (HHA) has chosen to utilize them to fund projects in emergency shelter, rapid rehousing, and homeless management information system (CMIS) components. The HHA has fully utilized ESG's flexibility to support a wide range of services that address significant gaps within the CoC.

The HHA has established program standards that govern ESG-funded projects. The standards include Rapid Rehousing Standards, Emergency Shelter Standards of Care, Standards for Coordinated Intake and Assessment, Housing First Standards in addition to CMIS Policies and Procedures. Workgroups were established and the HHA wrote, adopted and continue to update these standards. Attached are the program standards for implementing these activities.

**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 CoC prioritizes the needs of the homeless population by utilizing the Service Prioritization Decision Assistance Tool (SPDAT). In November 2013, the CoC adopted the SPDAT as its consolidated and coordinated evaluation instrument. Training on how to use the tool began in January 2014, with full adoption expected in July. The SPDAT is utilized in the intake process and has been shown to be useful in establishing suitable placement and service prioritization.

**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).**

PBC's Division of Human and Veteran Services (DHVS) oversees the ESG Program. DHVS requests that the HHA prioritize the qualifying ESG components and provide directions on how the ESG award should be allocated for the future year in order to allocate the ESG program money. DHVS uses the Notice of Funding Opportunity (NOFO) process to allocate ESG money to subrecipients

once the priorities and distribution mechanism have been set. The steps are as follows:

- A NOFO and scoring tool are created, as well as an appeals process.
- The NOFO is released and made available on the County's website.
- All interested applicants are invited to attend a Technical Assistance Meeting.
- All members of the Non-Conflict Grant Review Committee are provided training
- Proposals are first assessed by HSCA to ensure regulatory compliance, then forwarded to the Non-Conflict Grant Review Committee for review and scoring.
- The Non-Conflict Grant Review Committee scores and ranks proposals based on the following criteria: demonstration of need for the activity; evidence of site control and ability to develop and implement activity; reasonableness of total project costs and the ESG program amount requested; evidence of activity financial feasibility and that matching funds have been committed and are available for obligation; applicants ability to expend grant funds in a timely manner and past performance and the appropriateness of qualifications and backgrounds of personnel assigned to activity.
- The ESG funding recommendations are forwarded to the Board of County Commission (BCC) for final approval

**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.**

Individuals with lived experience or who are currently suffering homelessness are provided two seats on the HHA Governance Board, while teenagers aged 18-24 with similar life experiences are given three seats. The HHA recognizes that people who have been most affected by a lack of a permanent home are the actual experts on the challenges and solutions that surround homelessness, and they participate in the approval of all funding recommendations.

**5. Describe performance standards for evaluating ESG.**

All ESG-funded subrecipients undertake to provide the ESG homeless activity for a year with Palm Beach County. The scope of work in the agreement describes how reimbursement requests should be submitted and the reporting process for each subrecipient. All ESG agreements signed by the County are subject to ongoing monitoring and review throughout the duration of the contract. On-site monitoring visits, desk audits of monthly reports, evaluation of final reports, review of randomly selected case files, and ongoing communication with agency program staff are all examples of monitoring approaches.

All ESG-funded subrecipients enter into a one-year agreement with PBC to provide the ESG homeless activity. The scope of work in the agreement outlines the reimbursement and reporting submission process for each subrecipient. All ESG agreements signed by the County are subject to ongoing monitoring and review throughout the duration of the contract. On-site monitoring visits, desk audits of monthly reports, evaluation of final reports, review of randomly selected case files, and ongoing communication with agency program staff are all examples of monitoring approaches used.

All subrecipients are required by the contract to submit monthly reports along with their reimbursement requests. The monthly narrative reports highlight activity progress throughout the month with a full narrative summarizing contract actions and outcomes. Statistics on the type of activity carried out and the number of individuals/families assisted, as well as statistics on racial/ethnic characteristics of program participants, are also reported to meet HUD's reporting requirements. Subrecipients are informed that reimbursement claims will not be approved until all reporting criteria are satisfied successfully.

All sub-recipients must keep financial records and papers relevant to ESG grant costs and expenses to represent all costs of materials, supplies, services, and any other costs and expenses for which reimbursement or payment is sought. Following the filing of the final expenditure report, all records relevant to the grant are kept for at least five (5) years. If a claim, audit, lawsuit, or state/federal investigation is initiated before the record retention term expires, the records are kept by the sub recipient until all claims or findings are settled. Any records relevant to the ESG-funded activity are available to the County immediately.

The HHA has implemented performance measures for evaluating ESG-funded projects. The HHA has developed and approved fourteen (14) performance measures to date. The HHA is now using the performance metrics to provide reports on the operational aspect of ESG-funded activities in combination with CMIS.

## **6. Emergency Solutions Funding Recommendations**

The following table shows the funding recommendations made by the Homeless and Housing Alliance Executive Committee, which was tasked by the PBC Department of Community Services, Division of Human and Veteran Services to recommend the distribution of FY 2022-2023 ESG funds to non-profit entities. Additionally, \$75,000 was set-aside for funding of CMIS, and \$43,330 was allocated for program administration.

**FY 2022-2023 EMERGENCY SOLUTIONS GRANT FUNDING RECOMMENDATIONS**

Agency	Beneficiaries (Individuals)				
	Emergency Shelter (ES)	Rapid Re-housing (RRH)	ES	RRH	TOTAL
Aid to Victims of Domestic Abuse	\$135,000		144		144
Salvation Army	\$100,000		64		64
YWCA	\$40,642		416		416
Adopt A Family		\$183,762		112	112
<b>TOTAL</b>	<b>\$275,642</b>	<b>\$183, 762</b>	<b>624</b>	<b>112</b>	<b>736</b>

**The remainder of this page intentionally left blank**

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## **APPENDIX A – SF-424s and Non-State Certifications**



**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision		<b>* If Revision, select appropriate letter(s):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div> <b>* Other (Specify):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>	
<b>* 3. Date Received:</b> <div style="border: 1px solid black; padding: 2px;">05/13/2022</div>		<b>4. Applicant Identifier:</b> <div style="border: 1px solid black; padding: 2px;">B-22-UC-12-0004</div>			
<b>5a. Federal Entity Identifier:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			<b>5b. Federal Award Identifier:</b> <div style="border: 1px solid black; background-color: yellow; height: 15px; width: 100%;"></div>		
<b>State Use Only:</b>					
<b>6. Date Received by State:</b> <div style="border: 1px solid black; width: 80px; height: 15px;"></div>		<b>7. State Application Identifier:</b> <div style="border: 1px solid black; width: 250px; height: 15px;"></div>			
<b>8. APPLICANT INFORMATION:</b>					
<b>* a. Legal Name:</b> <div style="border: 1px solid black; padding: 2px;">Palm Beach County Board of County Commissioners</div>					
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <div style="border: 1px solid black; padding: 2px;">59-6000785</div>			<b>* c. UEI:</b> <div style="border: 1px solid black; padding: 2px;">078470481000</div>		
<b>d. Address:</b>					
<b>* Street1:</b> <div style="border: 1px solid black; padding: 2px;">100 Australian Avenue</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>Street2:</b> <div style="border: 1px solid black; padding: 2px;">Suite 500</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* City:</b> <div style="border: 1px solid black; padding: 2px;">West Palm Beach</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>County/Parish:</b> <div style="border: 1px solid black; padding: 2px;">Palm Beach</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* State:</b> <div style="border: 1px solid black; padding: 2px;">FL: Florida</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>Province:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* Country:</b> <div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* Zip / Postal Code:</b> <div style="border: 1px solid black; padding: 2px;">33406-1485</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>e. Organizational Unit:</b>					
<b>Department Name:</b> <div style="border: 1px solid black; padding: 2px;">Housing &amp; Economic Development</div>			<b>Division Name:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>					
<b>Prefix:</b> <div style="border: 1px solid black; padding: 2px;">Mr.</div>		<b>* First Name:</b> <div style="border: 1px solid black; padding: 2px;">Jonathan</div>			
<b>Middle Name:</b> <div style="border: 1px solid black; padding: 2px;">B</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* Last Name:</b> <div style="border: 1px solid black; padding: 2px;">Brown</div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>Suffix:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>Title:</b> <div style="border: 1px solid black; padding: 2px;">Director</div>					
<b>Organizational Affiliation:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>					
<b>* Telephone Number:</b> <div style="border: 1px solid black; padding: 2px;">561-233-3602</div>		<b>Fax Number:</b> <div style="border: 1px solid black; padding: 2px;">561-233-3651</div>			
<b>* Email:</b> <div style="border: 1px solid black; padding: 2px;">jbrown2@pbcgov.org</div>					

**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-218

CFDA Title:

Community Development Block Grant

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Palm Beach County's CDBG Program includes code enforcement, public facilities and infrastructure, public services, economic development, property acquisition, and program administration.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant **FL-018, FL-020, FL-021, FL-022**\* b. Program/Project **FL-018, FL-020, FL-021, FL-022**

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: **10/01/2022**\* b. End Date: **09/30/2023****18. Estimated Funding (\$):**

* a. Federal	6,492,406.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	75,000.00
* g. TOTAL	6,567,406.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on **08/15/2022**.
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix: **Mr.** \* First Name: **Jonathan**

Middle Name: **B**

\* Last Name: **Brown**

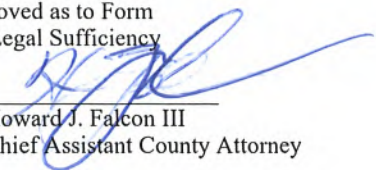
Suffix:

\* Title: **Director**\* Telephone Number: **561-233-3602** Fax Number: \* Email: **jbrown2@pbcbgov.org**

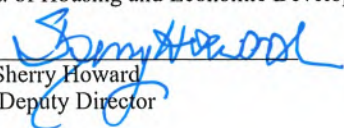
\* Signature of Authorized Representative:

\* Date Signed: **8/8/2022**

Approved as to Form  
and Legal Sufficiency

By:   
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:   
Sherry Howard  
Deputy Director



## ASSURANCES - CONSTRUCTION PROGRAMS

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

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

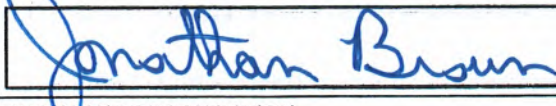
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.




11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Palm Beach County	8/8/2022

SF-424D (Rev. 7-97) Back

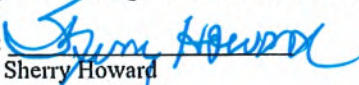
Approved as to Form  
and Legal Sufficiency

By:

  
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:

  
Sherry Howard  
Deputy Director



Application for Federal Assistance SF-424			
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>	
<b>* 3. Date Received:</b> 05/13/2022		<b>4. Applicant Identifier:</b> E-22-UC-12-0004	
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>	
<b>State Use Only:</b>			
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
<b>* a. Legal Name:</b> Palm Beach County Board of County Commissioners			
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6000785		<b>* c. UEI:</b> 078470481000	
<b>d. Address:</b>			
<b>* Street1:</b> 100 Australian Avenue			
<b>Street2:</b> Suite 500			
<b>* City:</b> West Palm Beach			
<b>County/Parish:</b> Palm Beach			
<b>* State:</b> FL: Florida			
<b>Province:</b>			
<b>* Country:</b> USA: UNITED STATES			
<b>* Zip / Postal Code:</b> 33406-1485			
<b>e. Organizational Unit:</b>			
<b>Department Name:</b> Housing & Economic Development		<b>Division Name:</b> <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b> Mr.		<b>* First Name:</b> Jonathan	
<b>Middle Name:</b> B			
<b>* Last Name:</b> Brown			
<b>Suffix:</b>			
<b>Title:</b> Director			
<b>Organizational Affiliation:</b> <input type="text"/>			
<b>* Telephone Number:</b> 561-233-3602		<b>Fax Number:</b> 561-233-3651	
<b>* Email:</b> jbrown2@pbcgov.org			

**Application for Federal Assistance SF-424**

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

B: County Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

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

Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-231

**CFDA Title:**

Emergency Solutions Grant

**\* 12. Funding Opportunity Number:**

**\* Title:**

**13. Competition Identification Number:**

**Title:**

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

Add Attachment

Delete Attachment

View Attachment

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

Palm Beach County's ESG Program provides services to the homeless and those at risk of homelessness through emergency shelters, transitional housing and rapid re-housing activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



# Application for Federal Assistance SF-424

## 16. Congressional Districts Of:

\* a. Applicant **FL-018, FL-020, FL-021, FL-022**

\* b. Program/Project **FL-018, FL-020, FL-021, FL-022**

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

	Add Attachment	Delete Attachment	View Attachment
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## 17. Proposed Project:

\* a. Start Date: **10/01/2022**

\* b. End Date: **09/30/2023**

## 18. Estimated Funding (\$):

* a. Federal	577,734.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	577,734.00

## \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on **08/15/2022**.
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

## \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

	Add Attachment	Delete Attachment	View Attachment
--	----------------	-------------------	-----------------

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

## Authorized Representative:

Prefix: **Mr.** \* First Name: **Jonathan**

Middle Name: **B**

\* Last Name: **Brown**

Suffix:

\* Title: **Director**

\* Telephone Number: **561-233-2602** Fax Number:

\* Email: **jbrown2@pbcbgov.org**

\* Signature of Authorized Representative: **Jonathan Brown**

\* Date Signed: **8/18/2022**

Approved as to Form  
and Legal Sufficiency

By: 

Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By: 

Sherry Howard  
Deputy Director



## ASSURANCES - CONSTRUCTION PROGRAMS

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

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

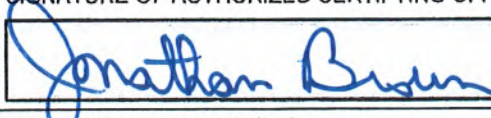
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.




11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Palm Beach County	8/8/2022

SF-424D (Rev. 7-97) Back

Approved as to Form  
and Legal Sufficiency

By:   
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:   
Sherry Howard  
Deputy Director



Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 05/13/2022		<b>4. Applicant Identifier:</b> M-22-UC-12-0215
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Palm Beach County Board of County Commissioners		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6000785		<b>* c. UEI:</b> 078470481000
<b>d. Address:</b>		
<b>* Street1:</b> 100 Australian Avenue		
<b>Street2:</b> Suite 500		
<b>* City:</b> West Palm Beach		
<b>County/Parish:</b> Palm Beach		
<b>* State:</b> FL: Florida		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 33406-1485		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Housing & Economic Development		<b>Division Name:</b> <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.	<b>* First Name:</b> Jonathan	
<b>Middle Name:</b> B		
<b>* Last Name:</b> Brown		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Director		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> 561-233-3602		<b>Fax Number:</b> 561-233-3651
<b>* Email:</b> jbrown2@pbcbgov.org		

**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-239

CFDA Title:

HOME Investment Partnership Program

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Palm Beach County's HOME Program includes assistance to developers of affordable housing, first time buyers, community development housing organizations, and program administration.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



# Application for Federal Assistance SF-424

## 16. Congressional Districts Of:

\* a. Applicant **FL-018, FL-020, FL-021, FL-022**

\* b. Program/Project **FL-018, FL-020, FL-021, FL-022**

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

	Add Attachment	Delete Attachment	View Attachment
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## 17. Proposed Project:

\* a. Start Date: **10/01/2022**

\* b. End Date: **09/30/2023**

## 18. Estimated Funding (\$):

* a. Federal	2,703,963.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	2,703,963.00

## \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on **08/15/2022**.
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

## \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

	Add Attachment	Delete Attachment	View Attachment
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21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

## Authorized Representative:

Prefix: **Mr.** \* First Name: **Jonathan**

Middle Name: **B**

\* Last Name: **Brown**

Suffix:

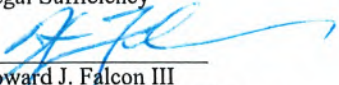
\* Title: **Director**

\* Telephone Number: **561-233-3602** Fax Number:

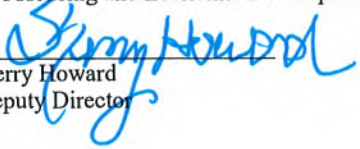
\* Email: **jbrown2@pbcgov.org**

\* Signature of Authorized Representative: **Jonathan Brown** \* Date Signed: **8/18/2022**

Approved as to Form  
and Legal Sufficiency

By:   
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:   
Sherry Howard  
Deputy Director



## ASSURANCES - CONSTRUCTION PROGRAMS

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

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

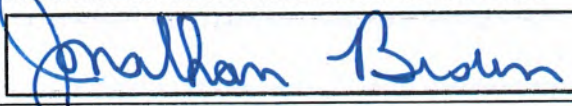
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Palm Beach County	DATE SUBMITTED 8/8/2022

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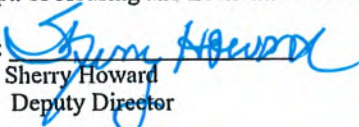
Approved as to Form  
and Legal Sufficiency

By:

  
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:

  
Sherry Howard  
Deputy Director



## CERTIFICATIONS

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

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

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

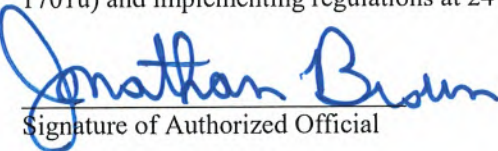
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

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

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

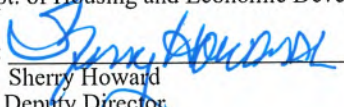
8/8/2022  
Date

Director, Palm Beach County Department of Housing and Economic Development  
Title

Approved as to Form  
and Legal Sufficiency

By:   
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:   
Sherry Howard  
Deputy Director

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## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022, 2023 & 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

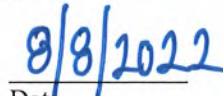
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

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

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

  
Signature of Authorized Official

  
Date

Director, Palm Beach County Department of Housing and Economic Development  
Title

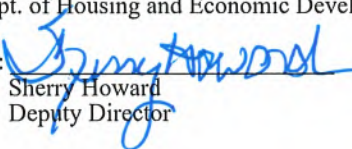
Approved as to Form  
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By:

  
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:

  
Sherry Howard  
Deputy Director



## OPTIONAL Community Development Block Grant Certification

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

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

Jonathan Braun      8/8/2022  
Signature of Authorized Official      Date

Director, Palm Beach County Department of Housing and Economic Development  
Title

Approved as to Form  
and Legal Sufficiency

By: [Signature]  
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By: [Signature]  
Sherry Howard  
Deputy Director

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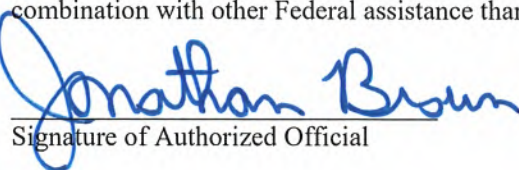
## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

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

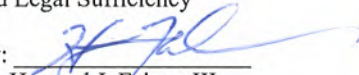
**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

 8/8/2022  
Signature of Authorized Official Date

Director, Palm Beach County Department of Housing and Economic Development  
Title

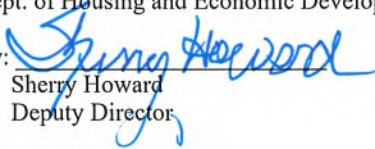
Approved as to Form  
and Legal Sufficiency

By:

  
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:

  
Sherry Howard  
Deputy Director

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## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

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

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

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

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

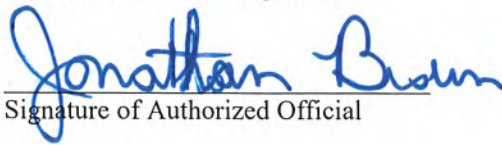
**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release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

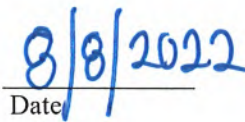
**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services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

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.



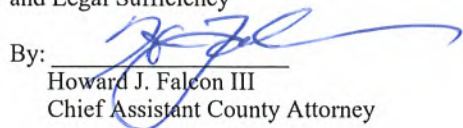
**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

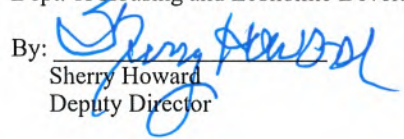
  
Date

Director, Palm Beach County Department of Housing and Economic Development  
Title

Approved as to Form  
and Legal Sufficiency

By:   
Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By:   
Sherry Howard  
Deputy Director

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### Lobbying Certification

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

Approved as to Form  
and Legal Sufficiency

By: 

Howard J. Falcon III  
Chief Assistant County Attorney

Approved as to Terms and Conditions  
Dept. of Housing and Economic Development

By: 

Sherry Howard  
Deputy Director



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## **APPENDIX B – Citizen Participation Comments**

Following is a summary of meetings held by the Department of Housing and Economic Development (DHED), Department of Community Services, and the Palm Beach County Board of County Commissioners (BCC) as related to the development and approval of the FY 2022-2023 Action Plan.

### **Action Plan Preparation Meeting**

Date: Tuesday, February 22, 2022  
Time: 10:00 A.M.  
Location: Due to the Coronavirus pandemic, the meeting was held virtual via WebEx

#### **Purpose of Meeting:**

This meeting was held to inform members of the public of the preparation of the FY 2022-2023 Action Plan and to seek their input into defining activities to be funded under the CDBG, HOME and ESG Programs. Comments received will be considered for incorporation into the Annual Action Plan.

#### **Summary of Public Comments (via WebEx):**

There were no public comments.

### **Palm Beach County Board of County Commissioners Workshop**

Date: April 26, 2022  
Time: 9:00 am  
Location: PBC Government Center, 301 N. Olive Avenue, West Palm Beach, FL 33401

#### **Purpose of Meeting:**

The purpose of this public meeting was to review the County's accomplishments under the ESG, CDBG and HOME Programs, discuss strategies for the FY 2022-2023 Action Plan and to receive direction from the Board of County Commissioners (Board) on these strategies.

Staff used a slide presentation to convey information to the Board and to the public about the Action Plan. The slides presented an overview of the HUD federal programs, the County's accomplishments under the previous year's ESG, HOME, and CDBG Programs and the recommended uses for the funds under the three programs.

#### **Board Discussion**

Members of the Board commented on the need for more affordable housing in Palm Beach County

#### **Summary of Public Comments:**

No public comments were received.

#### **Board Direction**

After discussion, the Board directed staff to move forward with addressing the proposed needs and goals and the proposed use of grant funds under the Action Plan as outlined in the staff presentation.

**Non-Conflict Grant Review Committee Meeting (ESG):**

Date: May 20, 2022  
Time: 9:00 am  
Location: 810 Datura Street, West Palm Beach, FL 33401

**Purpose of the Meeting:**

The Non-Conflict Grant Review Committee consists of three (3) individuals whose sole purpose is to review the applications for ESG funding which were submitted in response to a Notice of Funding Availability (NOFA) published on March 5, 2021 and advertised at [thehomelessplan.org](http://thehomelessplan.org). At the meeting, the Committee reviewed and ranked the six (6) applications received and to make funding recommendations.

**Summary of Public Comments:**

There were no public comments.

**Actions Taken by the Committee:**

The Committee arrived at the following funding recommendations: Adopt-A-Family \$183,762; Aid to Victims of Domestic Abuse (AVDA) \$135,000; The Salvation Army, \$100,000; Young Women's Christian Association (YWCA) \$40,642.

**Action Plan Public Meeting**

Date: June 22, 2022  
Time: 10:00 am  
Location: 100 Australian Avenue, Room 4-790, West Palm Beach, FL 33406 (in-person and via WebEx)

The purpose of the meeting is to present the FY 2022-2023 Draft Action Plan to the public, along with funding recommendations prior to approval by the Palm Beach County Board of County Commissioners.

**Summary of Public Comments:**

There were no public comments



## **Palm Beach County Board of County Commissioners Public Hearing**

Date: Tuesday July 12, 2022

Time: No Time Certain BCC Meetings start at 9:30 A.M.

Location: PBC Government Center, 301 N. Olive Avenue, West Palm Beach, FL 33401

### **Purpose of the Meeting:**

The purpose of the meeting is to present the FY 2022-2023 Action Plan to the Board of County Commissioners for approval.

### **Summary of Public Comments:**

A member of the Board commented on the need to consider senior citizens when developing affordable housing.

### **Board Direction**

Approved Action Plan for submission to HUD.

### **[HEDComments@pbcgov.org](mailto:HEDComments@pbcgov.org) (Email)**

- Address issues of homelessness and at risk of homelessness
- Make funding available to build new for-sale affordable housing units

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## APPENDIX C - HOME Program Description

The HOME Program was created by the 1990 Cranston-Gonzalez National Affordable Housing Act in order to make funds available to participating jurisdiction (PJs) for the provision of decent, safe, affordable housing and expansion of the long-term supply of affordable housing. The HOME program encourages and promotes partnerships between public and private entities for the creation of affordable housing opportunities to low and very low income households.

The County's FY 2022-2023 HOME allocation is \$2,703,963. Federal regulations governing the HOME Program allow for a maximum of 10% of HOME Program allocation to be spent on program administration and planning activities; at least 15% of the funds must be spent on CHDO administered activities; and 5% of the funds may be awarded to CHDOs to cover their administrative costs. The HOME Program regulations require each participating jurisdiction to provide, matching contribution, of not less than 25% of the funds drawn from its HOME Investment Trust Fund Treasury account for certain activities. During FY 2022-2023, the required match of \$574,593 will be provided from State Housing Initiatives Partnership (SHIP) Program funding. The specific amounts which Palm Beach County will set aside to fund eligible costs under the HOME Program are outlined below:

- *HED Program Administration and Planning:* \$270,396 representing 10% of the total allocation;
- *Community Housing Development Organization (CHDO) Set-Aside Program:* \$405,595 representing 15% of the overall HOME Program allocation. Funding will be used for the development, acquisition and/or rehabilitation of existing single family housing for lease or resale to eligible households;
- *CHDO Set-Aside Program Operating Expenses:* \$135,198 representing 5% of the overall HOME Program allocation;
- *Rental Housing Development:* \$1,000,000 for loan assistance to create permanent rental housing through the construction of new housing on vacant property, demolition of existing vacant buildings, and rehabilitation/redevelopment of existing residential property.
- *First Time Homebuyer Program:* \$892,774 in HOME Program funding awarded as second mortgages to first time homebuyer families whose income does not exceed 80% AMI.

The Table below shows that an estimated 33 households will benefit from affordable rental/homeownership housing units to be implemented under the HOME Program for FY 2022-2023.



Activity	Funding	# of Units /Households Assisted
Program Administration and Planning	\$270,396	n/a
CHDO Set-Aside Program	\$405,595	4 unit
CHDO Set-Aside Program Operating Expenses	\$135,198	n/a
Rental Housing Development	\$1,000,000	20 units
First Time Homebuyer	\$892,774	9 households
<b>Total</b>	<b>\$2,703,963</b>	<b>33</b>

### Matching Contributions

The minimum 25% match contribution is required only for certain HOME activities. Based on the County's HOME allocation for FY 2022-2023, the match requirement totals \$574,593. Palm Beach County provides its match requirement from the SHIP program and from County resources.

### Proposed HOME Projects

For FY 2022-2023, HED will undertake the following: Rental Housing Development, First Time Homebuyer Program and CHDO Activities. The County will utilize one of the following processes to select the agency(s) to implement each of these programs: designation by Board of County Commissioners; competitive Request for Proposal (RFP); and application process. Solicitations for funding are made available via public notices in the newspaper, posting on HED website, and email distribution to interested parties.

### HOME Priority Needs and Objectives

Programs to be supported with HOME funding are intended to address specific priority needs which are identified in the County's Five Year Plan for FY 2020-2024. The table below lists HOME activities that will be implemented during the upcoming fiscal year and correlates these activities with the priorities identified in the Plan.

HOME Program	Activity Type	Priorities Addressed
CHDO Set-Aside Activities	Acquisition/rehabilitation of existing single family housing for sale or lease to eligible beneficiaries.	Affordable Rental Housing; Affordable Homeownership: High
Rental Housing Development	Loan assistance program to create permanent rental housing.	Affordable Rental Housing: High

HOME Program	Activity Type	Priorities Addressed
First Time Homebuyer Program	Funding awarded as second mortgages to first time homebuyer families whose income does not exceed 80% AMI.	Affordable Homeownership: High

### **Affirmative Marketing Policy and Procedure**

To advance the County's efforts in achieving non-discrimination and equal opportunity in housing, and to fulfill the HOME requirements of outreach targeted at low and very-low income persons, particularly residents of public housing and manufactured housing, the County has established policies and procedures to affirmatively market housing units produced under these programs. The objectives of these affirmative marketing policies and procedures are in accordance with 24 CFR 92.351 of the HOME regulations and Section 3 of the Housing Development Act of 1968, as amended (12 U.S.C. 1701 U), and is applicable to other Federal, State and local regulations.

In order to carry out policies and procedures of HED's Affirmative Marketing Program, all non-profits, for-profits, municipalities and individual owner/investor subrecipients of the aforementioned programs must comply with the following:

- The Equal Opportunity logo or slogan must be used by owners in advertising vacant units, and be present on solicitations for Owner Proposal Notices.
- Lenders, non-profit housing developers, and program subrecipients are requested to solicit applications from persons in the housing market area who are not likely to apply to housing without special outreach. Owners and agencies can satisfy this requirement by posting a notice of vacancies or housing opportunities in locations, including, but not limited to, the following:
  - Mobile home communities
  - Churches and other related organizations;
  - Community organizations;
  - Fair housing groups;
  - Housing counseling agencies;
  - Agencies for the disabled;
  - Employment centers;
  - Social media;
  - Local public housing authorities (PHAs) or other similar agencies.
- Program participants must also utilize, to the extent feasible, commercial media informing potentially eligible homebuyers in the market. The use of community, minority, and other special interest publications likely to be read by persons needing special outreach is

recommended.

- All program participants are required to adequately inform and train their staff on the objectives of affirmative marketing and ensure that their staff takes every step to ensure compliance.
- Lenders, non-profit housing developers, and other program subrecipients will be required to keep records describing actions taken to affirmatively market units in the rehabilitation program. Palm Beach County HED will keep records of their efforts to affirmatively market units and will require rental owners to maintain records of such efforts. Investors/owners must also maintain copies of advertisements, minutes of meetings, income documentation, and census tract information, as applicable.
- Affirmative marketing records of the subrecipients/developers in the program will be monitored periodically. These records will include, but not be limited to: copies of brochures, news clippings, press releases, sign-in logs from community meetings, and any written letters of inquiry to, or from, prospective clients. The participants will be informed of their responsibility to adhere to the said requirements.

Meetings will be held, as needed, with selected subrecipients to ensure the smooth implementation of these and other program requirements.

### **Minority Outreach Program**

Regarding the procurement of supplies, equipment, construction, or services funded with HOME funds, the County requires that subrecipients/contractors make a positive effort to utilize the supplies and services of small business and minority/women-owned business enterprises, and to provide these sources with the maximum feasible opportunity to compete for contracts pursuant to this Agreement. To the greatest extent feasible these small business and minority/women-owned business enterprises shall be located in or owned by residents of the CDBG target areas as designated in the County's current Consolidated Plan.

This is required by Executive Order 11246, and in order to comply, Palm Beach County deliberately notifies the Offerors or Bidders of the "Equal Opportunity Clause" and the "Standard Federal Equal Employment Specification," and the goals and timetables for minority and female participation, expressed in percentage terms for the Contractor's aggregate workforce in each trade on all construction work in the covered area. The goals referenced are shown on the table below.



<b>Timetable</b>	<b>Goal for Minority Participation in each Trade</b>	<b>Goals for Female Participation in each Trade</b>
	22.4%	6.9%
Area Covered	Palm Beach County	All trades for the life of the project

These are required to be inserted into the bid documents and HED requires compliance to be documented on the contract award report. The goals are applicable to all the Contractor's construction work (whether or not it is Federal or federally assisted) performed in the covered area. If the contractor performs construction work in a geographical area located outside of the covered area, it shall apply the goals established for such geographic area where the work is actually performed. With regard to this second area, the contractor also is subject to the goals for both its federally involved and non-federally involved construction.

The Contractor's compliance with the Executive Order and the regulations in 41 CFR Part 60-4 shall be based on its implementation of the Equal Opportunity Clause, specific affirmative action obligations required by the specifications set forth in 41 CFR-60-4.3(a), and its efforts to meet the goals. The hours of minority and female employment and training must be substantially uniform throughout the length of the contract, and in each trade, and the contractor shall make a good faith effort to employ minorities and women evenly on each of its projects. The transfer of minority or female employees or trainees from Contractor to Contractor or from project to project for the sole purpose of meeting the Contractor's goals shall be a violation of the contract, the Executive Order and the regulations in 41 CFR Part 60-4. Compliance with the goals will be measured against the total work hours performed.

The Contractor shall provide written notification to the Director of the Office of Federal Contract Compliance Programs within 10 working days of award of any construction subcontract in excess of \$10,000 at any tier for construction work under the contract resulting from this solicitation. The notification shall list the name, address and telephone number of the subcontractor; the employer identification number of the subcontractor; the estimated dollar amount of the subcontract; and the estimated subcontract start and completion dates.

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## **APPENDIX D – Palm Beach County Section 108 Loan Program**

Palm Beach County Section 108 Loan Program has been in operation since 2003. The program currently has a loan portfolio of \$45,992,000 and services a total of fifty-two (52) current loans. At this time, approximately \$15,978,331 will be available to fund new loans.

The Community Development Block Grant (CDBG) Section 108 Loan Guarantee Program is an economic and community development financing tool authorized under Section 108 of Title I of the Housing and Community Development Act of 1974, as amended.

The 108 loans are intended to support and stimulate business development and investment by the private sector. The Program Criteria applies to all sources of 108 loan funding from the U.S. Department of Housing and Urban Development (HUD).

### **I. MISSION STATEMENT AND PROGRAM OBJECTIVES**

The Mission of the Palm Beach County Section 108 Loan Program is to enable existing businesses to expand and to create jobs; to revitalize communities and enhance the overall quality of life for all Palm Beach County residents.

#### **Program Objectives**

The 108 loans are intended to support and stimulate business development and investment by the private sector. Its objectives are to:

- i. Provide subordinated financing to eligible borrowers to fill a financing gap beyond the amount of private participation and equity investment that can be raised
- ii. Provide long term, fixed or variable rate financing at interest rates lower than conventional financing.
- iii. Provide a means for revitalizing disadvantaged areas
- iv. Create sources of new jobs

### **II. PROGRAM REQUIREMENTS**

#### **A) Guidelines**

The Palm Beach County Section 108 Loan Program will follow the HUD and the Small Business Administration (SBA) guidelines for eligibility and underwriting criteria.

#### **B) HUD Criteria**

- i. **National objective** - Each activity assisted with a Section 108 Loan is to benefit low and moderate income persons through the creation of jobs, where at least 51% of the new jobs being created will be held or made available to low and moderate income persons pursuant to 570.208 (a)(4)(i)(iv) (B,) pursuant to (a) (4) (v)
- ii. **Eligible Activity** -This use of guaranteed loan funds is for economic development activities in accordance with 24 CFR 570.703 (i)(1), pursuant to special economic development activities under 24 CFR 570.203 (b), assistance for a profit entity (Dougherty RB, LLC) carrying out an economic



development project

- iii. **Public Benefit Standards-** Public Benefit standards at 24 CFR 570.209 (b) are to be applied since special economic development activities pursuant to 570.203 are to be undertaken with the Section 108 Program. Thus for jobs created per loan they must meet either the individual test of 570.209 (b)(3)(i)(A) (less than \$50,000 of HUD Assistance per job) or the aggregate standards found at 570.209(b) (1)(i) (less than \$35,000 of HUD assistance per job)
  - Benefiting low and moderate income persons. Fifty one percent (51%) of new jobs created under this program must be offered to Palm Beach County residents that have a low and moderate income

#### **C) Notice of Funding Availability**

Each Fiscal Year, the Department of Housing and Economic Development (HED) will advertise the Palm Beach County Section 108 Loan Program through a Notice of Funding Availability (NOFA) published in a local newspaper and the County's website, and distributed to local economic development organizations.

#### **D) Loan Review Committee**

A Loan Review Committee (LRC) comprised of representatives from HED and the County's Office of Financial Management & Budget will review all of the Section 108 loan applications presented by the HED Staff and make the recommendation to approve or disapprove the loan application. The following criteria are in full alignment with federal guidelines and will be the benchmark for approval or denial of loans. A quorum of the LRC shall be fifty-one percent (51%) or two (2) of the appointed members. A quorum must be present to review and act upon any application.

The LRC will review each application with the required financial information to determine:

- i. Number of jobs to be created
- ii. Amount of Section 108 loan fund participation necessary
- iii. Amount of commercial or SBA loans
- iv. Ability of loan applicant(s) to repay the loan
- v. Collateral or security available
- vi. Trends from business history or market

No loan shall be made without the favorable recommendation of the LRC.

#### **E) Board of County Commissioners Approval**

The Board of County Commissioners (BCC) is the only authority that can waive or approve an exception to any of the Palm Beach County Section 108 Loan Program Criteria.

- i. When a project requires a special consideration because of the potential benefit it might bring to the area or local economy, HED will request that the BCC make an exception to the Section 108 Loan Program Criteria.

- ii. When the project requires exception to any criterion, the BCC is the only authority that can provide the ultimate approval. HED will request prior approval from the LRC and the BCC.
- iii. When the project requires more than \$1 million of Section 108 loan, the BCC is the only authority that can provide the ultimate approval. HED will request the prior approval of the LRC before the approval of the BCC.

### **III. PROGRAM DETAILS**

#### **A) Eligibility**

- 1. Area  
Palm Beach County boundaries
- 2. Eligible Applicants
  - i. Private, for-profit businesses that have been engaged in industrial, retail or distribution activities for at least two (2) years and are able to demonstrate sufficient profitability. An applicant must be a sole proprietorship, an incorporated business, a partnership or any other legally organized business registered with the State of Florida.
  - ii. Municipalities, Community Redevelopment Agencies (CRA). However, the local Entitlement Communities of the cities of Boca Raton, Boynton Beach, Delray Beach, Jupiter, Palm Beach Gardens, Wellington and West Palm Beach must provide 100% match for projects located within their municipal boundaries. Eligible sources of matching funds may be in the form of a loan, grant, property donation (land, buildings, and easements, at a value derived by Palm Beach County Property Appraiser's assessed value) or a match that is deemed appropriate by PBC.

#### **B) Section 108 Loan Amount and Required Owner's Equity**

- i. The maximum Section 108 loan amount for any given project is forty percent (40%) of the total project cost or up to \$1 million, whichever is lower. The maximum job-cost ratio for the project is \$35,000 per full-time equivalent job to be created
- ii. Projects that require under \$1 million of Section 108 loan financing will require the LRC
- iii. Projects that require over \$1 million of Section 108 loan financing will require the initial approval by the LRC and approval of the BCC
- iv. The maximum loan amount and term for working capital will be evaluated on an individual basis. Factors to be considered may include but not limited to the project size, nature of the project, and public benefits
- v. The applicant must commit a minimum of ten percent (10%) of the total project cost. The applicant will be required to provide proof of equity availability in accordance with US SBA Underwriting Criteria
- vi. The applicant will be required to provide proof of equity availability in accordance with the US SBA underwriting criteria.

- vii. The recommended levels of participation for the project funding are: 50% from a senior lender (bank, SBA, or independent institutional lender), up to a maximum of 40% from the PBC Section 108 Loan Program and 10% from owner's equity
- viii. Section 108 Loans shall be sent to Housing and Urban Development Field Area Office for review & recommendation of the project based on the eligibility determination of HUD Field Area Office
- ix. Section 108 funds shall not be used to substitute for available conventional financing, financing from the U.S. Small Business Administration or from the U.S. Department of Agriculture (refer to Palm Beach County Intermediate Lending Program).
- x. Each loan shall be evaluated that there shall be no undue enrichment to the borrower. Borrowers using SBA Funds in conjunction with 108 funds shall be exempt as SBA has a similar rule (funds available elsewhere) and shall thus be deemed exempt

#### **C) Rate**

The interest rate under the Note shall be the sum of the HUD Rate and the Lender Rate. The Lender Rate shall be a yearly rate of one hundred (100) basis points (1.0%), compounded annually. The HUD Rate shall be calculated on a monthly basis and shall include: A Fixed Rate of thirty-five (35) basis points (.35%) per annum, plus a HUD Floating Rate that is based upon the thirteen-week treasury rate (as published in the Money Rates Section of the Wall Street Journal, the New York Times, or a comparable publication). The thirteen-week treasury rate shall be set on the Monday preceding the first day of the month, or on the first business day thereafter, which precedes the Maker's monthly payment due date. At all times, there shall be at least thirty (30) days between the Treasury rate set date, and the resulting payment due date, and not less than ten (10) business days between the Lender's issuance of a monthly payment invoice to the Maker and the Maker's payment due date. If the loan is for working capital, the rate can be up to 335 basis points above the HUD Rate.

The Interest Rate shall be subject to change in the event that HUD elects to convert the Floating Rate to a Fixed Rate. The Interest Rate shall also be subject to change in the event of a default.

**HUD Conversion:** At the discretion of and at various dates selected by HUD during the Loan terms, HUD may elect to conduct a public offering of Section 108, which may include this Loan. In such event, the HUD Floating Rate specified above shall be subject to conversion to a Fixed HUD Interest Rate. If HUD elects to convert these loans, the Borrower will be given the option of fixing the interest rate as determined by HUD or maintaining the current HUD Rate. If the borrower selects to convert to a fixed rate, they shall pay to HUD the cost of the conversion. Should the borrower elect to continue floating, the borrower shall pay HUD \$100 per quarter. If the borrower does not participate in the public offering, it will be required to pay an Administration Fee of \$100 per quarter to the Fiscal Agent, which will be added to the interest due that monthly.

#### **D) Terms**

- i. Working Capital – Up to a maximum of ten (10) years
- ii. Machinery and Equipment – Up to a maximum economic life of the machinery and equipment or up to a maximum of twenty (20) years, whichever is less

- iii. Renovation – Up to a maximum of twenty (20) years
- iv. Acquisition of land, buildings or new construction – Up to a maximum of twenty (20) years

#### **E) Eligible Uses**

- i. Working capital, including revolving asset-based lines of credit, for labor and moving costs associated with the expansion or relocation of a project, inventory financing, receivable financing, training and marketing financing. Working capital will not be available to non-profit organizations. Working capital expenses will only be considered in conjunction with the total project and it will not be financed independently
- ii. Renovation and new construction of commercial/industrial buildings
- iii. Acquisition of commercial/industrial land and buildings
- iv. Acquisition and installation of machinery and equipment
- v. Refinancing of existing debt to an independent institutional lender (as part of a new project creating new job opportunities.)

Funds cannot be used to reimburse for costs incurred prior to Palm Beach County completing a HUD Environmental Review, except for planning costs of the project.

#### **F) Job Creation**

- i. Only those applicants proposing to create new jobs will be considered for funding under the Section 108 Loan Program
- ii. The job creation period begins with the issuance of a certificate of occupancy, the end of a renovation project, or when all funds are disbursed, whichever is first
- iii. The time frame to create the new jobs will be from one (1) to five (5) years. If HED considers that additional time is necessary, it will request the approval from the BCC
- iv. Where required, as for example when a borrower does not meet the Presumption Rule regarding National Objective, borrowers shall demonstrate that they have used best faith efforts to hire 51% of required new employees from the low-and-moderate income labor pool

#### **G) Underwriting**

In considering an application for a Section 108 loan, the following procedure is used for all applicants:

##### **1. Financial Analysis**

Initial Meeting – An initial meeting with the applicant at its location will occur early in the process to gain insight into the business, answer the applicant's questions and request any needed information. The meeting should take place prior to submission of an application for the purpose of helping the applicant meet Section 108 guidelines or to discourage applicants who cannot meet such guidelines.

History and Business – An evaluation will be made on how long the applicant has been in business and the type of goods or services provided by the applicant. It is critical to analyze the request in



respect to the specific type of industry. Not all industries have the same financing needs and payment terms to suppliers, and from customers. The balance sheet and operating ratios vary considerably from industry to industry.

Project Description - The applicant is required to provide a detailed description of the proposed project including:

- i. Benefits to be derived by the applicant
- ii. The impact the project will have in creating new jobs within HUD guidelines
- iii. A detailed breakdown of the use of the requested loan proceeds
- iv. Management and control

Resume – Resumes will be analyzed. The resume(s) will provide insight into the background and qualifications of the principals and key management personnel. For example, someone who has been successful in running a delicatessen may not have the abilities to operate a totally unrelated business such as a manufacturing concern.

Financial Statements – Historical financial statements and tax returns are required. If the most recent annual statement is more than two months old, an interim statement of less than 30 days is also required. Statement analysis should include:

- i. Trend analysis
- ii. Ability to repay debt - both short and long term.
- iii. Comparison to peer group companies as provided by: Ready Rates, Invesco or other similar references
- iv. Adequacy of working capital

#### Projected Financial Statements

Business financial statements when required by HED Staff, include balance sheets, operating statements, projections and a reconciliation of the net worth/capital section of the balance sheet. The projections must include the impact of the proposed financing and the underlying assumptions used to create the projections:

- i. Compare to Ready Ratios, Invesco, Robert Morris or other similar references
- ii. Examine the probability of achievement given the underlying assumptions
- iii. Determine if projected cash flow will service proposed debt

Personal Financial Statements - These are required from everyone having twenty percent (20%) or more ownership of the business along with personal tax returns. Personal guarantees are generally required from principals of the applicant.

## **2. Financial Ratios**

Loan to Value Target:

- i. Land and building: Real Estate shall not exceed 80%
- ii. Used machinery and equipment: not to exceed 90%
- iii. New machinery and equipment: not to exceed 80%
- iv. Account Receivables: not to exceed 80%
- v. Inventory: not to exceed 50%
- vi. Debt service coverage ratio: 1.20
- vii. Loan to value (LTV) ratio not to exceed 80%

## **3. Appraisal**

Appraisal reports will be required for projects involving acquisition and construction. HED will request from the applicant a copy of the appraisal completed by a licensed appraiser ordered by the participating lender (bank, SBA, or independent institutional lender). If there is not a participation of another lender, the applicant must select an appraiser with a valid State Certificate Appraiser License and provide a copy to HED. Business loans secured by Real Property shall not exceed an amount equal to 80% of the "as completed" appraised fair market value, less the outstanding balance on other indebtedness secured by a mortgage lien of senior or equal priority on the Real Property.

If the value of used machinery and equipment is needed to meet the Loan to Value Ratio required to underwrite the project, an evaluation report shall be required for a licensed appraiser, or licensed machinery and equipment dealer as to the value of the machinery and equipment. In the event that the used equipment is used as additional collateral, out of an abundance of caution, an appraisal or valuation shall not be required.

## **4. Credit History**

- i. Independent credit report/research are conducted on the applicant and the principals. This includes real estate searches, Uniform Commercial Code (UCC) searches with the Secretary of State and personal credit reports on the principals. This credit investigation is used, in part, to verify the accuracy of the information provided by the applicant and the principals and to find out if there are any undisclosed judgments, liens, etc.
- ii. The credit report/research will be run by the primary lender when participating in the project and by HED when the Section 108 loan is the only source of funding. HED will accept a copy of a credit report provided by the borrower as long as the report is less than 60 days old.

## **H) Collateral Evaluation**

- i. Land and building: Real Estate shall not exceed 80%
- ii. Used machinery and equipment: not to exceed 90%
- iii. New machinery and equipment: not to exceed 80%
- iv. Account Receivables: not to exceed 80%
- v. Inventory: not to exceed 50%

**I) Fees and Costs**

- i. Processing fee: A non-refundable fee of \$1,000 is payable at the time an application is submitted.
- ii. Section 108 Loan Fee: 3% of the total Section 108 loan amount due at the time of closing.
- iii. Other Fees: These include bank/SBA/independent institutional lender fees, appraisal and environmental fees, legal fees from outside firms and the Palm Beach County Attorney's Office, among others.

**J) Environmental Assessment**

- i. All proposed projects are subject to an environmental review in accordance with HUD standards per 24 CFR part 58.
- ii. Projects that require funding for land and building will require the same environmental submission as required by the first lender or in compliance with SBA criteria. Financing that does not have SBA or Bank participation will be required to have a Phase I Environmental Assessment and if applicable, a Phase II Environmental Assessment.
- iii. Projects that require funding for machinery/equipment and working capital pursuant to HUD guidelines are exempt from the Phase I and Phase II Environmental Assessments.

**K) Procurement**

In accordance with HUD regulations, Section 108 financed projects for private, for-profit businesses are exempt from HUD procurement policies.

**L) Other Program Information and requirements**

All Section 108 funded projects are required to comply with federal, state and local statutes, regulations and requirements, including but not limited to the Davis-Bacon Act, Workers Compensation, Section 3 of the Housing and Community Development Act, and insurance requirements.

Section 108 funded activities that result in the displacement of persons or businesses will trigger the Uniform Relocation Act compliance requirements.

**New Markets Tax Credits**

Without prior written approval by HUD, the Borrower (County) shall not use Guaranteed Loan Funds for an activity that is part of a project in which New Markets Tax Credits are part of the financing structure or in which Guaranteed Loan Funds will be used to leverage or generate New Markets Tax Credits pursuant to Section 45(D) of the Internal Revenue Code.

**Limitation on Tax-Exempt Bond Financing**

Without prior written approval by HUD, the Borrower (County) shall not use Guaranteed Loan Funds for an activity or project that is financed in whole or in part with tax-exempt bonds. HUD will not unreasonably withhold approval if the use of Guaranteed Loan Funds shall not void the tax-exempt

status of any bonds under the requirements of 26 U.S.C. 149 and otherwise complies with Circular No. A-129, Policies for Federal Credit Programs and Non-Tax Receivables, published by the White House Office of Management and Budget. For purposes of making this determination, HUD shall rely upon an 18 opinion of Borrower's counsel that the tax-exempt bonds meet an exception under 26 U.S.C. §149(b)(3) or are not considered "Federally Guaranteed," as defined in 26 U.S.C. 149(b)(2).

#### **Field Office Determination**

The Borrower (County) shall not incur any obligations to be paid with Guaranteed Loan Funds prior to the receipt of a written determination from the HUD Miami Field Office that either (i) each individual activity to be undertaken or supported with loan guarantee funds meets the eligibility requirements at 24 CFR 570.703, the national objective requirements at 24 CFR 570.208 and, if applicable, the public benefit standards at 24 CFR 570.209(b), or (ii) the Field Office has determined that the County's procedures for assuring compliance with the program requirements are acceptable.

#### **Citizen Notification**

The Borrower (County) shall follow its citizen participation plan under 24 CFR 570.704(a)(2) for each activity being assisted. The Borrower shall comply with the environmental review procedures (24 CFR part 58) for each activity being assisted.

### **IV. PROGRAM ADMINISTRATION**

#### **A) Choosing a Project**

##### Initial Meeting and Site Visitation

HED staff will meet with the applicant(s) to discuss the project and make a visit to the business and/or site location as necessary. Staff will explain the program and provide the applicants with a checklist of required information. The visit should provide an opportunity for staff to explain to the applicant if assistance might be available or to discourage applicants who cannot meet Section 108 guidelines.

##### Preliminary Review of Information

HED staff and the County's Consultant, if applicable, will perform a preliminary analysis of the interim financial statements, tax returns, payroll information, debt schedule, business plan, copies of agreements, and any other required documentation. This preliminary review will reveal if (a) the project meets the HUD guidelines and at least one of the national objectives, (b) the applicant has the capacity of paying the debts to a first lender [if applicable] and the Section 108 loan, and (c) the applicant has the capacity of fulfilling all of the requirements of the Section 108 Loan Program. If the preliminary review is positive, the applicant will be allowed to fill out a Loan Application Form.

#### **B) Seeking Lenders' Participation**

After determining that the project and the applicant qualify for the Section 108 Loan Program, HED staff and the County's Consultant will prepare a Section 108 Loan Package that will include all supportive documentation for underwriting and collateral, and a Project Summary and Analysis.



HED and the County's Consultant will seek the participation of commercial lenders, US SBA, and/or USDA in the project, as first lenders. HED will send the loan package to the bank(s) of preference of the applicant as well as some of the local, regional, or national commercial banks, and authorized Small Business Administration (SBA) lenders throughout the United States.

The commercial/SBA/independent institutional lender who decides to participate in the project will be required to issue a Letter of Commitment or Term Sheet to the applicant. The applicant will be responsible for submitting all of the required documentation requested by the lender to assure private participation.

**C) Obtaining Loan Review Committee Approval**

After determining that the project and the applicant qualify for the Section 108 Loan Program and have a firm Letter of Commitment from the participating commercial/SBA/independent institutional lender for the project, HED and the County's Consultant will prepare a Section 108 Loan Package for the LRC with all of the supportive documentation. The LRC shall either approve or disapprove the loan application.

**D) Obtaining BCC and HUD Approval**

After the LRC approves a loan application, HED will seek approval from the BCC and HUD as follows:

- i. When the project requires more than \$1 million of Section 108 loan funds, the BCC is the only authority that can provide the ultimate approval. HED will request the approval of the LRC and the approval of the BCC before submitting a formal request to HUD.
- ii. When the project requires less than or up to \$1 million of Section 108 funds, meets all of the Program criteria and does not require an exception to any of the criteria of the Section 108 Loan Program, HED will request approval from the LRC. ALL Section 108 Loans shall be sent to Housing and Urban Development Field Area Office for review and recommendation of the project based on the eligibility determination of HUD Field Area Office.

**E) Loan Acceptance**

- i. Upon receipt of HUD approval, evidenced by a Fixed/Variable Note to PBC, HED will submit the PBC's Loan Commitment Letter to the borrower.
- ii. The borrower will review the terms and conditions of the County's Loan Commitment Letter and if accepted, will sign the letter and returning it to PBC by the date indicated.

**F) Closing**

Outside Counsel, selected by and under the supervision of the County Attorney's Office, shall close all loans in coordination with HUD's Counsel and the Borrower's Counsel. HED staff and the County Attorney's Office will be responsible for supervising compliance with the loan closing documents.

**G) Servicing**

Loan servicing regarding payments and submission of reports and financial statements will be carried out by HED and the Palm Beach County Clerk & Comptroller's Office.

**H) Supervision and Reporting**

HED staff shall review on a yearly basis all financial statements of the borrower, compliance reports and make a field visit to the borrower's location at least every two years. Borrowers who are problematic or cannot be brought into compliance shall be referred to the County Attorney's Office for corrective action.

**BUSINESS REQUIREMENTS**

Applicants who are awarded funding will be required to enter into an agreement with Palm Beach County.

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## **APPENDIX E – Summary of the Analysis of Impediments to Fair Housing Choice – Fiscal Years 2020-2021 to 2024-2025**

### **Description of the Palm Beach County CDBG Entitlement Jurisdiction**

The Palm Beach County CDBG Entitlement Jurisdiction is comprised of all of unincorporated Palm Beach County as well as the 31 municipalities who have joined with the County to make up the Jurisdiction:

### **Overview of Fair Housing Administration in Palm Beach County**

The U.S. Department of Housing and Urban Development (HUD), and in some cases the U.S. Department of Justice, is responsible for investigating and enforcing violations of the Fair Housing Act. However, since HUD does not have sufficient resources, it has implemented the Fair Housing Assistance Program (FHAP). Under this program, HUD grants to a jurisdiction whose fair housing laws and remedies are “substantially equivalent” to those provided under the federal Fair Housing Act, as amended in 1988, the authority to enforce fair housing laws. HUD recognized Palm Beach County Office of Equal Opportunity (OEO) as a substantially equivalent agency in March, 1997 and refers cases of housing discrimination in Palm Beach County to the OEO as the local FHAP, for fair housing law enforcement action.

HUD also has implemented the Fair Housing Initiatives Program (FHIP) to increase awareness of fair housing laws and to conduct enforcement activities. Governmental and non-profit agencies may apply to HUD for FHIP status and funding to conduct workshops and media campaigns and to do complaint-based and systemic testing to identify discrimination in housing. Palm Beach County has two FHIP agencies within its jurisdiction; the Legal Aid Society of Palm Beach County, Inc. and Fair Housing Center of the Greater Palm Beaches, Inc.

#### ***a. Palm Beach County Office of Equal Opportunity***

The Palm Beach County Office of Equal Opportunity (OEO) is a HUD certified Fair Housing Assistance Program (FHAP) agency. The OEO investigates and resolves complaints of discrimination in housing, public accommodations and employment in the County on the basis of race, sex, color, religion, national origin, disability, sexual orientation, familial status, marital status, age or and gender identity or expression, in accordance with Palm Beach County Ordinance.

#### ***b. The Legal Aid Society of Palm Beach County, Inc.***

The Legal Aid Society is a HUD certified Fair Housing Initiatives Program (FHIP). The agency also receives CDBG funding from the County to undertake enforcement and counseling services to persons who lodge housing discrimination complaints.

#### ***c. The Fair Housing Center of the Greater Palm Beaches, Inc.***

The Fair Housing Center of the Greater Palm Beaches (FHC) is a full service, community-based private agency which provides comprehensive Fair Housing Services throughout the State of Florida. The



agency is a member of the National Fair Housing Alliance and works to ensure equal and affordable housing opportunities for all people. Activities carried out by the FHC include testing, enforcement, education, predatory lending prevention, outreach and counseling.

### **Methodology Used to Compile the Analysis of Impediments to Fair Housing Choices**

Data used to compose the AI was derived from several sources:

- a) Demographic information obtained through U.S. Census and local demographic reports.
- b) Complaint data obtained from Palm Beach County Office of Equal Opportunity and the Legal Aid Society of the Palm Beaches.
- c) Data from the responses to a survey conducted from October 17, 2019 to December 3, 2019 to assess barriers to fair housing.
- d) Meetings with constituent groups and commissions, including regional meetings in Belle Glade and West Palm Beach, FL in 2019 and 2020 and a workshop before the Palm Beach County Board of County Commissioners.

### **Review of Factors**

#### ***Historic Review of Reported Fair Housing Violations in Palm Beach County***

- Over the three year period 2017 to 2019, some 500 fair housing complaints were filed of which 67.0% were based on disability; 10.0% race and color; 10.0% national origin; and 8.0% familial status. The 500 complaints led to 635 issues with most prevalent ones being denial of reasonable accommodation and discrimination in conditions or terms of sale, rental occupancy or in services or facilities.
- The number of complaints and issues show a declining trend over the three year period, but when viewed against the results of the on-line survey it may be a cause for concern and attributed to people's reluctance to report fair housing violations and the fact that many do not know how to report a violation.

#### ***Review of Survey Data***

An online survey was administered between October 12, 2019 and December 3, 2019. Links to the survey (surveymonkey.com) were placed on the websites of the following agencies: Palm Beach County's main page; PBC Housing and Economic Sustainability; PBC Office of Equal Opportunity; Legal Aid Society of Palm Beach County; Fair Housing Center of the Greater Palm Beaches; The Urban League of Palm Beach County; the Arc of Palm Beach County; and the Coalition for Independent Living Options. There were 244 response to the survey which asked the following questions:

1. What do you like about your Neighborhood?
2. What neighborhood qualities would you look for if you were to move?
3. What are the greatest housing needs in your community? Are there parts of your community that are particularly affected?

4. What areas of the County do you generally see as preferable to live in? What make them attractive places to live? What barriers might someone face in moving to one of these preferable areas?
5. Do residents with similar incomes generally have the same range of housing options? Are there any barriers other than income that might impact housing choices?
6. Under the County's Fair Housing Ordinance, it is illegal to discriminate in housing based on race/color, national origin, religion, sex, handicap, familial status (presence of minor children), age, marital status, sexual orientation, gender identity or expression. Did you know this?
7. Have you ever been discriminated against in attempting to rent or buy housing, based on the above categories? If so did you file a complaint? If not why?
8. Have you ever been discriminated against while seeking a mortgage or homeowners' insurance, based on the above categories? If so did you file a complaint? If not, why?
9. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination? Describe
10. Are people in the county segregated where they live? What causes this segregation to occur?
11. Is there an adequate supply of affordable housing and housing that is accessible to people who are disabled?
12. Are you aware of the types of fair housing services offered in the County and the entities offering these services?
13. Have you ever heard of the Palm Beach County Office of Equal Opportunity? If so, what does it do?
14. Are public resources (e.g. parks, schools, police and fire services, libraries, grocery stores, supermarkets, public transportation) readily available and in close proximity to your neighborhood?
15. Is there anything that you feel is important to our research that was not addressed in this questionnaire?

#### ***Review of Commission on Affordable Housing- Triennial Report (2018)***

The following summarize the recommendations made by the CAH in 2018.

- The County should employ a staff position charged with the task of shepherding applications for affordable housing developments through all stages of the development review process. The position should work to expedite application progression through the review process and to advocate for necessary development approvals.
- The County should utilize earnings generated by investment of school impact fee collections to increase funding to the Impact Fee Affordable Housing Assistance Program (IFAHAP), and should seek other sources of funding for IFAHAP.
- The County should modify its land development regulations to be less restrictive in order to allow for greater opportunity for the development of accessory dwelling units. Specifically, the County should ease regulations to offer flexibility in setback requirements, eliminate requirements for kitchen removal, and eliminate the prohibition on separate electrical service.
- The County should expand the inventory of County-owned properties suitable for housing to include those properties deemed undevelopable. The County should be bolder in its disposition of County-

owned land to developers of affordable housing.

- The County should direct resources to support the preservation and upgrading of the existing affordable housing stock in order to increase its long-term sustainability

### ***Review of Home Mortgage Disclosure Act (HMDA) Loan Application Information***

HMDA data was reviewed to assess loans made for home purchases only. Based on HMDA Data for 2017 which was tabulated and published by the Shimberg Center for Housing Studies, a total of 31,860 home purpose loans were originated in Palm Beach County of which 31,703 was for purchase, improvement, or refinancing of a single-family home. Loans for purchase of single-family homes accounted for 63.0% of all loans related to these types of residences. Home purchase loans of between \$200,000 and \$400,000 made up 50% of all home purchase loans. This range encompasses the average price of a single-family home in Palm Beach County of \$317,000.

Of the 20,133 home purchase loans originated, 3,984 (20%) were denied. White Americans accounted for 76.0 percent of all home purchase loans originated of which 17.0% were denied. Nearly 30% of all other home purchase loans from other racial categories were denied. This disparity in loan approvals by racial category, as well as the reason for the high proportion of loans originated for white Americans compared to other races needs to be explained.

Some of the reasons given for denial of loans are: Debt to income (20%); collateral 16%); incomplete credit application (9%); credit history (8%).

### ***Review of the Transportation System***

Approximately 93.6% of the population owns one or more vehicles. The major transportation mode used to get to work are: driving alone (78.5%); carpooling (9.7%); and public transportation (1.5%). It is therefore clear that many households do not consider the availability of public transportation an important factor when making decisions on where to live.

Palm Tran is the public transit bus system run by the Pam Beach County Government. It provides ubiquitous service throughout the county traversing all major and arterial roadways. It operates on over 32 routes and the headway on each route, during the peak hour, ranges between twenty minutes and sixty minutes. This relatively long headway may be a contributing factor to the low use of the service by residents, or conversely may be the company's response to level of demand for its services.

Palm Tran has average monthly ridership of 800,000 passengers and an on time performance of 78.0%. The average passenger load factor not be determined. It serves 19 park and ride facilities countywide, including some with Tri-Rail. Examination of the transit system showed heavy concentration in the eastern and central portions of the County with fewer services in the western portion.

### ***Review of Schools and Education System***

The data reflected on the table below are pertinent to Palm Beach County. In the age group 25+, by race, Blacks have the lowest percentage of persons with a high school diploma and with a college degree. To what extent is this contributed to by the areas in which they live? Review of the public education system, on face value does not provide an answer to this problem. There are fourteen (14) colleges and universities operating in Palm Beach County and several others in Broward and Dade Counties, which are accessible to Palm Beach County residents. The vast majority of these are State/Public universities and therefore offer degrees at reasonable prices. Student loans, grants and other forms of scholarships are also available to students.

<b>% of Persons by Race</b>	<b>% of Persons with a High School Diploma</b>	<b>% of Persons with a Bachelors or Higher Degree</b>
% Population (25+ years)	88.1	37.1
% White Alone (25+ years)	90.5	37.9
% White Alone – Non-Hispanic or Latino (25+ years)	95.0	41.8
% Black Alone (25+ years)	78.3	18.4

Palm Beach County School Board operates 163 schools (107 Elementary, 33 Middle. and 23 High – see following maps). These are located throughout the county and students are assigned to schools dependent on where they live. Busing takes place if a student lives a specific distance from school, which is considered to be too far to traverse on foot. Also, some schools have unique curriculum and students are accepted from countywide based on application and attainment of specific academic achievement. Regardless of where one attend school, students for the most part have available to them the same pool of academic options and are subject to the same testing criteria by the State of Florida. Annually, the State assigns grades to each school based on performance. The grades range from A (High Performer to D (Failing School). Data indicates that generally there is a correlation between school performance and location. High performance school are located in a higher income areas; low performance schools are located in low income areas.

### **Identification of barriers and impediments:**

Based on the aforementioned items which were reviewed, it appears that the availability of public transportation and schools do not present barriers to where people choose to live as both are provided throughout the County and in the case of schools, the curriculum is the same throughout, along with access to magnet programs that are readily available as students chosen for these programs are selected countywide and are usually bused to a school.



Review of three years of historic information, when viewed against the results of the on-line survey leads to conclusions, which support the existence of pervasive fair housing violations, which often go unreported. Some of these impediments are:

- A belief amongst some residents that the present system to address fair housing abuse is skewed in favor of landlords and therefore some when aware that they are being subject to fair housing discrimination consider it a “waste of their time” to file a formal report. This and the point made in the next bullet may explain the relatively low reported incidences of fair housing violations reported (500) over the three year period 2017 through 2019.
- Many persons are unaware of the Office of Equal Opportunity and how to file a fair housing complaint.
- When reviewing loan approvals by racial categories, there seem to be a great disparity in the percentage approved for White Americans compared with the percentage approved for other racial categories. Also, the reason for the high proportion of loans originated for white Americans compared to other races needs to be investigated.
- The County is now emphasizing the production of more affordable housing through various county supported/implemented programs. The county should ensure that these efforts does not lead to unintended fair housing issues.

#### **Fair Housing Plan:**

This section identifies implementation strategies to eliminate or mitigate the negative impacts of specific barriers as identified in previous sections.

<b>Item to be addressed</b>	<b>Measures to be taken</b>	<b>Responsible Entity</b>
Increase people’s awareness of their fair housing rights and about how to recognize a violation and how to file a report.	<ul style="list-style-type: none"> <li>• Increase outreach through media blast (radio and television ads, postings on website, strategic presentations).</li> </ul>	<ul style="list-style-type: none"> <li>• Primarily OEO</li> <li>• FHC (website and presentations)</li> <li>• Legal Aid (website and presentations)</li> </ul>
Intensify efforts to identify and prosecute fair housing violators	<ul style="list-style-type: none"> <li>• Increased testing and prosecutions.</li> </ul>	<ul style="list-style-type: none"> <li>• OEO</li> <li>• FHC</li> <li>• Legal Aid</li> </ul>
Apprise landlords, realtors, lenders and county/municipal personnel about fair housing.	<ul style="list-style-type: none"> <li>• Undertake training sessions and presentations.</li> </ul>	<ul style="list-style-type: none"> <li>• Coordinated by OEO</li> </ul>
Ensure that current and future changes to the county’s Building and zoning regulations do not unintentionally promote fair housing violations.	<ul style="list-style-type: none"> <li>• Review of current ordinances and regulations as well as the policies governing all count supported or initiated affordable housing programs</li> </ul>	<ul style="list-style-type: none"> <li>• PBC- PZ&amp;B</li> </ul>
Ensure that financial institutions do not discriminate in their lending policies.	<ul style="list-style-type: none"> <li>• Conduct testing</li> </ul>	<ul style="list-style-type: none"> <li>• FHC</li> </ul>

## **APPENDIX F – PBC Homeless and Housing Alliance ESG Standards**

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# **Palm Beach County Permanent Supportive Housing Program Standards**



## **PERMANENT SUPPORTIVE HOUSING INTRODUCTION**

**Permanent Supportive Housing (PSH)** – community-based housing without a designated length of stay. To be in permanent housing, the program participant must be the tenant on a lease/occupancy agreement for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause. Permanent supportive housing means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently. (24 CFR 578.3)

### **Program standards ensure:**

- Program accountability to individuals and families experiencing homelessness
- Program compliance with HUD rules
- Program uniformity
- Adequate program staff competence and training, specific to the target population being served
- Units at entry and annually meet the Housing Quality Standards

## **SERVICE PHILOSOPHY**

The housing programs are guided by a service philosophy that:

- Values client choice and promotes community integration;
- Serves as the basis for how the program will meet the goals and needs of clients;
- Guides the implementation and development of program activities and services based on the best available evidence of service effectiveness.

## **PERMANENT SUPPORTIVE HOUSING CRITERIA**

The program will provide safe, affordable housing that meets participants' needs in accordance with client intake practices and within HUD guidelines for permanent supportive housing programs.

### **Housing Guidelines:**

- Considers the needs of the individual or family experiencing homelessness;
- Provides assistance in accessing suitable housing;
- Signs occupancy agreements or leases (or subleases) with all clients residing in housing;
- Signs addendum regarding Housing Quality Standard inspections if applicable (**Appendix A**);
  - a. For those organizations that own and manage their own properties, the Housing Quality Standard Inspection must be completed by a third party. For those agencies who assist participants in securing a lease, the Housing Specialist will present and review the Addendum to the Lease regarding Quality Standard Inspection repair and timeframes with the landlord or property manager. The Case Manager and/or Housing Specialist will discuss the Addendum to the Lease regarding Quality Standard Inspection repair timeframes (**Appendix A**) with the participant prior to participant signing. This addendum will be signed at the time

of the lease to ensure the unit meets Housing Quality Standards at all times. Should the landlord fail to meet the timeframes outlined in the Addendum, then the Case Manager will arrange to move the participant as quickly as possible.

- Signs addendum for Violence Against Women's Act (VAWA) (Form HUD-91067);
- Enters into a lease agreement for a term of at least one year, which is renewable for terms that are a minimum of one month long, terminable only for cause;
- Not impose occupancy charges as a condition of residing in the housing and;
- Charge rent not to exceed the highest of:
  - a. 30% of the household's monthly adjusted gross income;
  - b. 10% of the household's monthly income
- Provision of housing and related services are provided without regard to race, color, religion, disability, sex, age, national origin, ancestry, marital status, familial status, sexual orientation, gender identity and expression, or genetic information;
- Allows the right to dress in accordance with the gender with which a participant self-identifies;
- Participants receive services/support consistent with their self-identified gender.

## **DEFINITIONS**

### **Client-Centered Approach Service Delivery:**

The programs utilize a respectful, strengths-based approach that views the individual and/or family as a whole. This approach is useful in areas of client engagement and helps to overcome resistance. Each person is unique with special talents and abilities. Staff assist clients to identify their dreams, their strengths, barriers to housing, and help them to identify short- and long-term goals. Together, these serve as powerful motivators to help people change their lives. Clients are centrally involved in determining their individual goals, plan for discharge, and the type and intensity of services that they receive.

### **Literally Homeless (Category 1):**

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

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels; paid for by charitable organizations or by federal, state and local government programs);
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- Fleeing or attempting to flee Domestic Violence.

### **Disabling Condition:**

HUD defines a disabling condition as:

- A. A disability as defined in Section 223 of the Social Security Act (as documented by the Social Security Administration);
- B. For individuals with psychiatric disabilities, chronic substance abuse, and HIV/AIDS: a physical, mental, or emotional impairment, which is
  - i. expected to be of long-continued and indefinite duration,
  - ii. substantially impedes an individual's ability to live independently, and
  - iii. of such a nature that such ability could be improved by more suitable housing conditions;
- C. A developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act;
- D. The disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome.

**Chronic Homelessness:**

A) The definition of "chronically homeless", defined in section 401(2) of the McKinney-Vento Homeless Assistance Act, 42 U.S.C. 11360 (McKinney-Vento Act or Act), is: An individual or family that is homeless and resides in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and residing in such a place for at least 1 year or on at least four separate occasions in the last 3 years where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

B) The statutory definition also requires that the individual or family has a head of household with a substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability. A Verification of Disability Form signed and dated by one of the licensed clinicians identified by HUD is required to document the disability.

**Gender Minorities:**

Gender Minorities may include individuals whose gender identity and/or gender expression may be different from their assigned gender at birth irrespective of physical appearance, surgical status, or documentation of identity.

**Vulnerability Index - Service Prioritization Decision Assistance Tool (VI SPDAT & SPDAT):**

Both are an evidence-informed approach to assessing acuity (OrgCode Consulting).

- **VI-SPDAT** is a triage tool. It looks for the presence of an issue.

- **SPDAT** is an assessment tool. It looks at the nuances of the depth and impacts of what is happening in the person or family's life. The SPDAT tool, across multiple components, prioritizes who to serve next and why, while concurrently identifying the areas in the person/family's life where support is most likely necessary in order to avoid housing instability

### **Family:**

Family includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: a group of persons residing together.

## **PSH GUIDING PRINCIPLES**

### **Housing Focused Service Delivery Components Provided in Permanent Supportive Housing:**

Homelessness is first and foremost a housing problem and should be treated as such. Therefore, the guiding principle of permanent supportive housing is permanent housing. The principal components of Housing Focused Service Delivery are:

- **Housing, Resource, and Support Services Assessment** which focuses on housing needs, preferences, and barriers; resource acquisition (e.g., entitlements); and identification of services needed to sustain housing
- **Housing placement assistance** including housing location and placement; financial assistance with housing costs (e.g., security deposit, first month's rent, move-in and utilities connection, short- or long-term housing subsidies); advocacy and assistance in addressing housing barriers (e.g., poor credit history or debt, prior eviction, criminal conviction)
- **Case management services** specifically focused on obtaining and sustaining permanent housing

## **OTHER GUIDING PRINCIPALS**

- The health and safety of clients, volunteers and staff is of the highest importance in each PSH program. Training, policies, procedures and ongoing assessments are intended to encourage, improve and maintain the health and safety of all people residing in PSH programs.
- In order to provide effective PSH programs and services, housing clients should be afforded the opportunity to have a voice in service provision, program planning, and policy development.
- PSH programs are part of a larger network of homeless services and agencies. Collaboration within this network is important to ensure effective and coordinated services.



- People who are homeless should be stabilized in permanent housing as quickly as possible and connected to resources necessary to sustain that housing.
- Case Managers will meet at a minimum of once a week during the transition into housing for at least the first 4-6 weeks and then as defined by the client's Service Plan. Case Managers should maintain phone contact as participant progresses towards sustaining permanent housing.
- Participants shall be moved into housing as rapidly as possible.
- Compliance with the Permanent Supportive Housing Standards will be a contract requirement to apply/renew PSH funding.

## **APPROACH TO DELIVERING SERVICES**

Permanent Supportive Housing Programs administer services utilizing a housing first approach with no barriers to housing entry. Housing First is a whole-system orientation that offers permanent, affordable housing as quickly as possible for individuals and families experiencing homelessness, and then provides the supportive services and connections to the community-based supports needed to keep their housing and avoid returning to homelessness. The approach begins with an immediate focus on helping individuals and families secure housing. Income, sobriety and/or participation in treatment or other services are not required as a condition for securing housing. All services are voluntary and are not a condition for retaining housing. Housing provides people with a foundation from which they can pursue other goals. Tenants are assisted in developing or improving skills for independent living while they live in permanent housing instead of requiring them to be housing ready first.

Palm Beach County adheres to the following principles of Housing First in its PSH programs:

- Admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
- Applicants have a choice about where they want to be housed based upon their available resources (affordability), circumstances (appropriateness) and involvement of landlords to rent to the service participant.
- Applicants are not expected to graduate through a continuum before accessing permanent housing (for example: from street to shelter; shelter to transitional housing; transitional housing to permanent housing). Applicants can move directly from their homelessness into permanent housing. Housing is not used as a reward.
- Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of "housing readiness."
- Housing accepts referrals directly from shelters, street outreach, drop-in centers, and other parts of the approved coordinated assessment system frequented by vulnerable people experiencing homelessness.

- Applicants do not need to be compliant with a treatment program i.e. medical, mental health or substance abuse to be housed.
- Applicants do not need to be compliant with medications to be housed.
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly client-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. PSH programs may require case management as condition of receiving rental assistance.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for eviction.
- Client selection for permanent supportive housing includes a prioritization of eligible clients based on the criteria approved in the Palm Beach County Standards for Coordinated Intake and Assessment which are in compliance with CPD-14-012.
- Clients are given reasonable flexibility in paying their tenant share of rent on time and offered special payment arrangements (e.g. a payment plan) as defined by individual program guidelines for rent arrears and/or assistance with financial management (including representative payee arrangements).
- Case managers are trained in and actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling.
- Participants are not coerced in any way to participate in the program, to select a particular housing unit, to participate in any other community programs, or in any other way.
- Services are provided by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of client's lives. Clients are engaged in non-judgmental communication regarding drug and alcohol use, and where clients are offered education regarding how to avoid risky behaviors and engage in safer practices. Clients whose drug and alcohol use impacts the safety of minor children including the potential loss of their housing, will be reported to the Department of Children and Families.

## **HOUSING QUALITY STANDARDS INSPECTION**

- HQS & rent reasonableness must be completed prior to executing a master lease. These documents are good for twelve (12) months unless there is a change in tenants.
- Initial Rental Agreement or Occupancy Agreement should not be written for a time period that exceeds the end date of the master lease. For example, if the master lease was signed on February 1<sup>st</sup> and is good through January 31<sup>st</sup>, but the participant does not move in until April 1<sup>st</sup>, then the initial Rental Agreement or Occupancy Agreement should only be good through January 31<sup>st</sup>, too.
- HQS & rent reasonableness must be completed prior to re-negotiation of the master lease.
- HQS re-inspection must be completed within twelve (12) months of the initial master lease execution. Preference for the re-inspection is to be completed within 30 days prior to the end of the lease period, but no earlier than 60 days prior to the lease period.

- If a participant leaves before the end of the initial master lease time period, a new HQS must be completed and the initial Rental Agreement or Occupancy Agreement must only be written for the remaining term of the initial master lease.
- For monitoring purposes, the date the initial master lease is signed sets the timeframe for re-inspections, not the date of the Rental Agreement or Occupancy Agreement.

## CRITERIA

- Housing Programs must be an active member in the PBC Coordinated Intake and Assessment System.
- Clients who are in need of housing services must be assessed and eligibility established through the Homeless Resource Center (HRC) which serves as the Central Point of Access or by one of the Homeless Outreach Programs during off-site outreach.
- Eligibility: Individuals and families that are “**Literally Homeless**” (meeting HUD’s Category 1) or Fleeing Domestic Violence (meeting HUD’s Category 4).
- Participation Requirement: All households (with the exception of households in domestic violence situations) must be screened prior to program entry.
- Vacant beds must be filled based on chronic status and acuity from highest to lowest as per CPD-16-11.
- Lacks the resources to obtain housing.
- Has a member of the household with a severe or significant disabling condition who has also met the requirements for the length of time homeless as defined in the Chronic Homeless definition.

Programs may disqualify an individual or family for the following reasons:

- Criminal backgrounds might impact eligibility based on location of housing or program type (singles vs families).
- Previous tenancy which resulted in termination due to criminal activity, whether arrested or not, or egregious destruction of property. This is evaluated on a case by case basis as per individual program guidelines.

## HOUSING PRIORITIZATION ACUITY LIST

Screening is often a collaborative process that occurs within the broader homelessness crisis response system. The VI-SPDAT and SPDAT can be completed by the HRC Navigators or by any of the Homeless Outreach Program Staff.

The HRC maintains a Housing Prioritization Acuity List which serves as the CoC's wait list regardless of how the individual or family is navigated. Clients are advised that once the SPDAT has been completed during the Coordinate Intake and Assessment process, they are placed on the Housing Prioritization Acuity List. For more information about the prioritization process, refer to the Palm Beach County Continuum of Care Written Standards of Operating Policies and Procedures for Coordinated Intake and Assessment.

## **ASSESSMENT PROCEDURES**

The SPDAT provides an assessment of clients utilizing an individualized, strengths-based, culturally responsive manner. The initial SPDAT is completed by a Navigator, Intake Staff or any staff conducting Outreach. Prior to acceptance into the program, the staff person who completed the SPDAT gathers the documentation of homelessness, chronic homelessness and disability and provides this information to the Housing Program according to HUD's guidelines and PBC Coordinated Intake and Assessment Standards. Once the individual/family enters the housing program, the provider may obtain more in-depth information regarding an individual/family, upon their agreement, to participate in additional assessments. The purpose of this information is to assist programs in meeting the service needs of all participants.

Following the assessment, the case is reviewed and an acceptance decision is made. At that time a "soft transfer" of the case from the Navigator/Outreach Staff to the PSH Program.

## **SERVICE PLANNING AND MONITORING**

Each individual/family participates in the development and ongoing review of the Service Plan that is the basis for delivery of appropriate services and support. The plan is developed with the full participation of the individual/family at the time of entry into the program. The plan is completed within 30 days ( $\pm$  5 business days) of entrance into the program. The plan is signed by the case manager and individual/family.

Plan is individualized, person-centered, and focuses on the achievement of housing-specific goals based on the assessment. The Plan includes:

- Agreed upon goals, desired outcomes, and timeframes
- Services and supports to be provided, and by whom.
- Personal responsibility and self-determination

Service planning provides:

- Available service options
- How the organization can support the achievement of desired outcomes
- Benefits, alternatives, and risks or consequences of services



The Case Manager and client regularly review progress toward achievement of service goals and sign revisions to service goals and plans at a scheduled case management meetings. When assessing the continuing appropriateness of service goals, it is important to consider the service recipient's current level of housing crisis, continuing need for services, and desired level of program participation. A short-term crisis response goal does not directly address longer-term goals such as treatment or rehabilitation.

The service plan needs reviewed at least quarterly. However, timeframes for the review should be adjusted depending upon: issues and needs of persons receiving services; frequency and intensity of services provided; and program goals. When the need for additional services is identified or a crisis occurs, reviews should occur more frequently.

## **CASE MANAGEMENT SERVICES**

The program shall provide access to case management services by trained staff to each individual or family participating in the program that are individually tailored to the needs and preferences of service recipients. As part of Case Management services the SPDAT will be administered at move in, 30 days, 90 days, 180 days, 270 days and 365 days ( $\pm$  5 business days for each assessment). For those legacy cases already in the program prior to implementation of the SPDAT, an initial SPDAT is required at the participant's anniversary date and then annually until the participant exits the program.

### **Services may include but not be limited to:**

- Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant;
- Helping participants learn to live in housing, maintain their housing in a safe manner, get along with fellow tenants and the landlord;
- Helping participants create support systems and participate in the community as they desire;
- Individualized budgeting and money management services are provided to program participants as offered by the program;
- Representative payee services may be provided;
- Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, personal hygiene skills, leisure-time activities, transportation, and obtaining vital documents (Social Security card, birth certificate, etc);
- Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision making, conflict resolution, and stress management;
- Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education;
- Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement and job maintenance;
- Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance;

- Mental Health services, such as relapse prevention, crisis intervention, outpatient therapy, psychiatric services, medication monitoring and/or dispensing;
- Services, such as outpatient treatment, relapse prevention and crisis intervention;
- Physical health care, such as routine physicals, health assessments, and family planning education;
- Legal Services related to civil (rent arrears, family law, uncollected benefits) or criminal (warrants, minor infractions, etc.);
- Assistance with food, clothing and/or transportation and
- Planning a path to permanent housing stability

Housing programs may require clients to take part in case management, participants are not required to take part in disability-related services, provided through the project as a condition of continued participation in the program. Examples of disability related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. For all programs, participants must, however, meet all terms and conditions of tenancy, including lease requirements.

## **TERMINATION**

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

The program may terminate services when the following occurs:

- a. A participant engages in violent or aggressive behavior toward others, including program staff.
- b. A participant is evicted by the landlord.
- c. Inability to document Housing Focused Case Management as defined by individual program guidelines.

Housing Programs must follow the due process provisions outlined in 24 CFR 578.91 and defined in their Program Handbooks. Termination must include a formal process that recognizes the rights of individuals receiving assistance under the due process of law.

Termination process, at minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- Written notice to the program participant containing a clear statement of the reason for termination;
- Review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

Termination under this section does not bar the recipient or sub-recipient from providing further assistance at a later date to the same individual or family.

## **FOLLOW-UP SERVICES**

The program may provide a continuity of services to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals or by monitoring the Homeless Management Information System (HMIS).

Follow up may include but not be limited to:

- Develops exit plans to ensure continued housing stability and connection with community resources, as desired.
- Attempts to follow up with phone or written contact at a minimum of at least once after the client exits the program.
- Provide follow-up services that include identification of additional needs and referral to other agency or community resources;
- Services may be provided to formerly homeless individuals or families for up to six months after their exit from homelessness or as program resources allow.

## **PERSONNEL**

The Housing Program shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

### **Staffing Criteria:**

- Employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability;
- Provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program;
- Provides ongoing and/or external training, and development to further enhance knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability;
- Abides by the standard operating procedures found in the HMIS Policies and Procedures manual and adheres to the privacy and confidentiality terms set forth in the User Agreement.
- Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related or experience in working with the individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.

## **CLIENT FILES**

Case Files are maintained to include up to date documentation necessary for the effective delivery and tracking of service and kept confidential.

Files at a minimum will include but not be limited to and adhere to:

- Information required by HUD, participation agreements, SPDAT's, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, and any follow-up and evaluation data that are compiled;
- Client information verifying data has been entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual;
- **Certification of Domestic Violence Form should be given at each lease signing and in the case of termination, in accordance with Violence Against Women's Act (VAWA) (Appendix B);**
- Files will be maintained for each participant in a secure place and shall not disclose information from the file without the written permission of the client's as appropriate except to project staff and other agencies as required by law;
- Informed consent to release any client identifying data to be utilized for referrals, research, teaching and public interpretation;
- Retained for seven (7) years after the expenditure of all CoC funds from the grant under which the client was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.
- Projects that utilized CoC funds for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 20 years after the date that the project site is first occupied, or used, by program participants; and
- Records pertaining to other funding sources must adhere to those record retention requirements.

## **EVALUATION AND PLANNING**

Housing Programs will participate in ongoing program planning and evaluation.

Evaluation will include but not be limited to:

- Written goals and objectives for its services that meet the outcomes required by HUD;
- Reviews the case management, housing, and follow-up needs and existing services that are available to meet client needs;
- Revisions, as appropriate to goal, objectives and activities made based on program evaluation.

### **Performance Evaluations**

- Employment and Income Growth for Adult Leavers and Stayers within the grant period
- Obtain and Maintain Mainstream Benefits
- Retention of Permanent Housing
- Exit Destinations to Permanent Housing



**Adopt by the Homeless and Housing Alliance Membership-July 18, 2019**  
**Ratified by the Homeless and Housing Alliance Membership – July 17, 2019 via email vote**  
**Reviewed & Updated by Standard Policy and Procedures Committee – July 9, 2019**  
**Adopted by the Homeless and Housing Alliance Membership – October 2018**  
**Reviewed & Updated by Standard Policy and Procedures Committee – October 9, 2018**  
**Ratified by the Homeless and Housing Alliance Executive Committee- April 18, 2016**  
**Adopted by the Homeless and Housing Alliance Membership – April 28, 2016**

**Appendix A**

Addendum to the Residential lease between \_\_\_\_\_  
(Landlord)

And \_\_\_\_\_ for the apartment located at  
(Tenant)

\_\_\_\_\_  
(Location)

The above reference apartment is a \_\_\_\_\_ and is leased at a rate  
(#of bedrooms & baths)

equal or less than other comparable units in the complex.

Tenant has the right to terminate the lease in the event that HUD funding is discontinued or if the landlord fails to keep the property in compliance with HUD Quality Standard Inspection requirements. The landlord will have 30 days to correct the Quality Standards Deficiencies following notification of the actual problems with the property unless the issue affects immediate safety of the resident. According to HUD guidelines an emergency (life threatening) violation must be corrected within 24 hours.

\_\_\_\_\_  
Signature of Leasing Agent/Landlord

\_\_\_\_\_  
Date

**CERTIFICATION OF DOMESTIC VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing and Urban Development**

OMB Approval No. 2577-0286

**Purpose of Form:** The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

**Use of This Optional Form:** If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

**Submission of Documentation:** The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

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**Client Signature**

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**Date**





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**Palm Beach County Continuum of Care  
Written Standards of Operating Policies & Procedures  
For  
Coordinated Intake & Assessment**

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## INTRODUCTION

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National research has highlighted Coordinated Intake & Assessment as a key factor in the success of ending homelessness. Coordinated Intake & Assessment can enhance the quality of client screening and assessment and better target program assistance where it can be most effective. As a result, the system for preventing and ending homelessness is less fragmented and scarce resources are used more efficiently.

### **What is Coordinated Intake & Assessment?**

Coordinated Intake & Assessment for Palm Beach County CoC is a centralized access point through the Homeless Resource Center (HRC), outreach, and telephone based centralized intake model. Initial screening can be conducted for all populations at one of the outreach locations or through a Navigator over the phone. Coordinated Intake & Assessment includes the following core components:

- Information so that people will know where or how to access intake for homeless prevention or housing services;
- A screening and assessment process and tools to gather and verify information about the person and his/her housing and service needs and program eligibility and priority;
- Information about programs and agencies that can provide needed housing or services;
- A process and tools for referral of the person to an appropriate program(s) or agencies; and assistance in making program admissions decisions.

While most housing and services are made available through other agencies, a variety of services may be provided on site at the “HRC” or by a “Navigator”. These services typically meet basic client needs and may include diversion services, showers, laundry, assessment, referral, shelter, bus pass and/or access to mainstream resources.

## KEY TERMS

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A number of key terms are subject to varying interpretations and thus should be defined for purposes of this document. They are as follows:

- **Acuity List** – A list that represents the prioritization of persons who are in need of homeless services or housing interventions, in rank order based on highest level of need to lowest.
- **Admission** – Process to admit a client into a program.
- **Assessment** – A process that reveals the past and current details of an individual's/household's strength, and needs, in order to match the client to appropriate services and housing. For the purpose of this document, assessment will refer to a process (whether at primary screening and intake or at entry to a housing program) that reveals a client's eligibility, needs, barriers and strengths.
- **By-Name List** – A list that represents the persons or households who are in need of permanent housing.
- **Central Point of Access** – For the purpose of this document, Central Point of Access is the Homeless Resource Center where individuals or families can go to for intake and assessment of homeless and housing services for which they may qualify.
- **Chronic Homelessness** – A chronically homeless individual is someone who has experienced homelessness for one continuous year or longer, or who has experienced at least four episodes of homelessness in the last three years that add up to 12 months or more and has a disability. A family with an adult member who meets this description would also be considered chronically homeless.
- **Coordinated Assessment** – Relates to the utilization of the same assessment tool across multiple systems to connect clients to services as a means for a coordinated entry system. For the purpose of this document, that tool is the SPDAT (Service Prioritization Decision Assistance Tool) based on population, Individual, Family, or Transition Age Youth.
- **Coordinated Intake Provider Network** – is a consortium of partners that includes homeless service providers, advocacy groups, government agencies, and homeless individuals who are working together to address the housing and support needs of the homeless in Palm Beach County.
- **Coordinated Systems** – Within our community, coordinated systems is defined as interconnected network of systems that services homeless and at risk households, and consists of coordinated intake and assessment, diversion, prevention, rapid re-housing, transitional housing, permanent supportive housing and other tailored programs and services, and linkages to mainstream resources.



- **Diversion**- An approach that supports individuals and families by assisting them in identifying immediate alternative housing arrangements and, if necessary, connecting them with financial and other services to help them return to permanent housing.
- **Document Ready** – This term indicates that an individual’s status has been documented through verification of homelessness and/or chronic homelessness through HMIS data, letters from outreach providers or shelters, confirmation documents provided by hospitals or treatment programs, or self-certification up to 30 days and/or verification of disability through SHP form, disability income, or psychiatric and/or medical diagnosis.
- **Fiscal Agent** – For the purpose of this document, the entity that coordinates funding and provides oversight to the coordinated intake and assessment system.
- **FUSE** – Palm Beach County FUSE (Frequent User System Engagement): A multiple systems approach to housing unsheltered community members who have high rates of criminal justice contacts, homeless service utilization, and admission to detox and crisis stabilization services. This small subpopulation consists of the top utilizers of services that result in high public costs.
- **HEARTH ACT** – The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) act of 2009 that includes Emergency Solutions Grant (ESG) and Continuum of Care (CoC) grants.
- **HMIS** – Homeless Management Information System is a centralized database designated to create an unduplicated accounting of homelessness that includes housing and services.
- **Homeless** – HUD definition as of January 2012; is an individual or family who lacks a fixed regular, and adequate nighttime residence, which includes a primary nighttime residence of: a place not designed for or ordinarily used as a regular sleeping accommodation (including car, park, abandoned building, bus/train station, airport or camping grounds); a publicly or privately operated shelter or transitional housing, including a hotel or motel paid for by government or charitable organizations. In addition a person is considered homeless if he or she is being discharged from an institution where he or she has been a resident for 90 days or less and the person resided in shelter (but not transitional housing) or place not meant for human habitation immediately prior to entering the institution.
- **Homeless Resource Center** – The agency identified as the primary administrator of coordinated intake and assessment. For the purpose of this document, that is the Philip D. Lewis Center and the partners administering the coordinated assessment process; Gulfstream Goodwill Industries, Adopt-A-Family and all Homeless Outreach Teams.
- **Housing First** – Evidence-Based programming for housing homeless individuals and families according to the provisions of a standard lease without requiring services other than case management in order to attain and retain housing.

- **Housing Ready** – A case management/housing approach that places homeless households into permanent housing only when determined the household was ready. Until that time, households are placed into long-term shelter or transitional housing programs. The approach is being replaced by the Evidence Based Practice of Housing First and “rapid re-housing.”
- **Housing Stability (formerly Prevention)** – Assistance that can aid households in preserving their current housing situation by providing assistance to households that otherwise would become homeless.
- **HUD** – The Department of Housing and Urban Development; the United States federal department that administers federal program dealing with homelessness. HUD oversees HEARTH-funded programs.
- **Information** – Specific facts about a program, such as its location, services provided, eligibility requirements, hours of operation, and contact information
- **Intake** – the general process between the client's initial point of contact and screening for eligibility. This step involves primary assessment of needs, strengths and resources to refer households into appropriate services
- **Linkage or Access to Mainstream Resources** – An approach to help people stabilize their housing for the long term by linking them to resources for which they are eligible within their community.
- **Navigation** – The process of assessing eligibility in order to connect or refer individuals for services.
- **Navigator** – An intake worker whose responsibility is to provide coordinated intake and assessment for individuals or families seeking housing services.
- **Outcome** – The specific result of what was provided from a specific activity or service; in relation to HUD/HEARTH, a specific result as detailed by HUD/HEARTH funding requirements.
- **Outreach** – An outreach worker whose responsibility it is to identify individuals and families who are sleeping in places not meant for human habitation and engage with these individuals with the goal of connecting them to housing resources through coordinated intake and assessment.
- **Prioritization** – The process of using service-specific evaluation criteria to determine which individuals are most urgently in need of homeless services or housing interventions.
- **Progressive Engagement** – refers to a strategy of providing a small amount of assistance to everybody who enters your homelessness system, then waiting to see if that works. If it does not, you provide more assistance and wait to see if that works. If not, you apply even more, until eventually; you provide your most intensive interventions to the few people who are left.

- **Rapid Re-housing** – An approach that focuses on moving homeless individuals and families into appropriate housing as quickly as possible by providing the type, amount and duration of housing assistance needed to stabilize the household. Clients do not need to be considered “Housing Ready”.
- **Referral** – linking a client to a particular program for possible assistance.
- **Screening** – For the purpose of this document, the process by which eligibility for housing and services is determined at the initial point of contact through coordinated entry. Once screening determines eligibility, the intake and referral process follows.
- **Systems Change** – For the purpose of this document, the process by which our CoC has altered the way homeless and at-risk households engage with the homeless and housing providers within our communities. The purpose of system change is to implement practices that have shown to decrease the incidence and length of time in homelessness, with a long-term goal of reducing and ending homelessness.
- **Tailored Programs and Services** – An approach to case management services that matches the services to the particular individual’s or family’s needs rather than using a one-size-fits-all approach.
- **Targeting** – Process of determining the population to whom assistance will be directed. That is, the target population. The targeting process can occur at both the system and the program levels.
- **Verification** – The gathering and review of information to substantiate the applicant’s /client’s situation and support program eligibility and priority determination.
- **Veteran (HUD) / Veteran Grant Per Diem (GPD)/ Veteran Self Sufficiency Veteran Families (SSVF)** - Any individual that has served one day of active duty.
- **Veteran (VASH) & Healthcare for Homeless Veterans (HCHV)** – any individual that has served 24 months of active duty or is eligible for VAMC Healthcare and has a discharge or release from service under conditions other than dishonorable discharge.

## ENTRY SYSTEM

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### Applicants and Clients:

- Clients who are in need of homeless prevention or housing services can access information and eligibility criteria through the HRC, which serves as the Central Point of Access. Participants seeking assistance must be screened at the HRC by a Navigator or by the Homeless Outreach Teams during off-site outreach. Participants not eligible for services will be referred to other appropriate community resources.
- Eligibility: Individuals and families that are “**Literally Homeless**” (meeting HUD’s Category 1 definition of homelessness).
- Eligibility for Youth: could include “**Category 2**” at risk of homelessness

- Participation Requirement: All households (with the exception of households in domestic violence situations) must be screened prior to program entry.
- Eligible Clients can expect :
  - To be treated with respect and dignity
  - Their initial phone call for assistance to be answered live or returned within two business days & navigated to appropriate resources.
  - For intake and assessment to be scheduled for eligible clients within seven to fourteen business days as capacity allows
  - To be matched to an appropriate program based upon their unique needs, and referred based on their priority status to opening in a program
  - To wait until the system has the capacity to assist them, and to get help through diversion or other resources available to them
- Responsibilities
  - Client must:
    - Answer all questions truthfully and to the best of their ability
    - Bring all required documentation
    - Keep their contact information current in order to be notified of available openings, and referred in a timely manner

#### **Providers:**

- Participation Requirement
  - All providers receiving funding through HEARTH or a HUD funded program are required to participate in the coordinated intake and assessment process.
  - Providers must be live on the HMIS system and must maintain data which is inputted no later than within 24 hours of a service or outcome being achieved or rendered.
  - Providers must have an appeal process for those applicants who have been denied service or entry into a program.

#### **HRC Partners:**

- It is the HRC Partner's responsibilities to:
  - Regularly update and make current all program eligibility guidelines and program contact information so that Navigators can make the best referrals possible.
  - Ensure that when a placement referral is made, to confirm within two business days whether the referral is accepted, declined by provider, declined by client, or pending, or the provider is unable to contact the client.
  - Bring problems and suggestions to the monthly Standard Policies & Procedures Committee meeting.
  - Oversee provision of homeless diversion and housing services for eligible clients.



- Ensure utilization of the same screening and assessment tool, data collection forms, policies on eligibility verification and referral/information-sharing systems.

**See Coordinated Entry Flow Charts for homeless services delivery system overview (Appendix B).**

**NOTE:** *This system acknowledges that the needs of a household fleeing or attempting to flee, domestic violence, dating violence, sexual assault or stalking, may be different than the needs of non-victims. Navigators will be trained on sensitivity in regards to victim's assistance, and referrals will only be made to domestic violence providers.*

## **ASSESSMENT TOOLS & PROTOCOLS**

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The Coordinated Entry System focuses on providing a continuum of care including prevention, diversion, rapid re-housing, and permanent supportive housing approaches. For housing programs, the acuity list is utilized to ensure that those with the highest level of vulnerability and longest time homeless are prioritized for enrollment into housing services.

A Navigator assesses each household's eligibility for services. Prevention services target households at imminent risk of homelessness and may be referred to available homeless prevention programs. Diversion services will target participants as they are applying for entry into shelter. For housing programs, rapid re-housing services target literally homeless participants and the VI-SPDAT score indicates this type of housing. Housing first and permanent supportive housing targets chronically homeless participants and the VI-SPDAT score identifies this housing type.

### **Applicants and Clients:**

- Each applicant is evaluated on a variety of criterion, including rental history, criminal history, domestic violence, mental health challenges, disabling conditions, language barriers, educational attainment, employment status, and length of homelessness. Services are then assigned based on the VI-SDPAT score.
- The Assessment tool provides a procedure for determining which applicants are eligible and appropriate for the variety of housing and support services available in the community.

### **Providers:**

- Each participant who is referred for housing or services will have been evaluated through an assessment based on their current barriers to obtaining and successfully maintaining permanent housing.
- The Assessment will be used as a guide, with the understanding that each applicant has a unique set of circumstances.

**HRC Partners and CoC Partners:**

- The Vulnerability Service Prioritization Decision Assistance Tool (VI-SPDAT) is the assessment tool utilized for this system.
- The VI-SPDAT will utilize 4 domains for individuals and 5 for families to determine an acuity score that will help inform Navigators and Providers about the following:
  - People who will benefit most from Permanent Supportive Housing
  - People who will benefit most from Rapid Re-Housing
  - People who are most likely to end their own homelessness with little to no intervention on your part
  - Which areas of the person's life that can be the initial focus of attention in the case management relationship to improve housing stability.
  - How individuals and families are changing over time as result of case management process.
- The VI-SPDAT will be integrated into the HMIS System and each agency will ensure data is being maintained and monitored.
- The HRC Partners will provide a system of care that allows clients to give feedback on suggestions and improvements of the Intake and Assessment Process.
- The HRC Partners will ensure that the VI-SPDAT is not used to:
  - Provide a diagnosis
  - Assess current risk or be a predictive index for future risk
  - Take the place of other valid and reliable instruments used in clinical research and care

CoC Partners that receive federal CoC and ESG funds and any local funds required by the funder must participate in the Coordinated Assessment process and track data in the Homeless Management Information System (HMIS). Only Domestic Violence providers are exempt from the HMIS requirement as per Florida Statute and Federal regulations. CoC partners receiving federal CoC and ESG funds or any other local funds dedicated to homeless services must fill vacant beds based on acuity from highest to lowest as per CPD-16-11.

## ACUITY DETERMINATION

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Palm Beach County's Acuity list is formulated through the utilization of an index comprised of multiple indicators of vulnerability, as well as associated criteria for program and/or sub-population eligibility. Each indicator is weighted. The values of each indicator are calculated to identify a final score. This score determines ranking on the acuity list. The list is ordered from highest to lowest score. The highest scoring client receives priority for service/housing enrollment.

### **Individual Acuity Criteria: (This criteria pertains to Veterans and Individuals Fleeing DV)**

The following indicators and associated scores are used to calculate an individual's final score:

- VI-SPDAT score: Value ranges from 0 – 17 possible points
- FUSE: Clients who are identified on the FUSE list are assigned 3 points
- Special medical/physical considerations and other vulnerabilities not captured on the VI-SPDAT: 0 = no additional considerations, 1 = vulnerabilities causing mild risk of harm, 2 = vulnerabilities causing moderate risk of harm, 3 = vulnerabilities causing severe risk of harm
- Length of time for current episode of homelessness (more than one year): < 1 year = 0 points, 1 – 3 years = 1 point, 4 – 7 years = 2 points, 8 – 11 years = 3 points, 12 – 15 years = 4 points, 16 – 19 years = 5 points, 20+ years = 6 points
- Special Populations: Those who experience domestic violence or those with veteran status are assigned 3 points per special population (6 points maximum)

In addition to the above indicators, chronically homeless individuals who are document ready under HUD guidelines will be assigned an additional 35 points (equal to sum of vulnerability indicators).

VI-SPDAT + FUSE + Special Considerations + Length of homelessness + Doc Ready + Special Populations = Total Score

The indicator scores plus points for documentation are added to calculate the final score. The acuity list is ranked in order from highest score to lowest. The highest score is given priority for housing intervention.

Days of homelessness will be used as a tie breaker for clients with the same score.

Individuals will become inactive on the acuity list for the following reasons: permanently housed, have relocated out of state, Outreach and Navigation have been unable to make contact in last 90 days, or if person is deceased. Individuals can be active again following resuming contact with Navigation or Outreach.

Individual RRH Acuity Scoring Legend				
<b>VI - SPDAT</b>		<b>LoH (Current Episode) *tie breaker</b>		
<b>Score</b>	<b>Acuity</b>	<b>Min</b>	<b>Max</b>	<b>Acuity</b>
0	0	-	1 year	0
1	0	1 year	3 years	1
2	0	4 years	7 years	2
3	0	8 years	11 years	3
4	0	12 years	15 years	4
5	5	16 years	19 years	5
6	6	20 years	-	6
7	7			
8	8			
9	9			
10	10			
11	11			
12	12			
13	13			
14	14			
15	15			
16	16			
17	17			
		<b>Special Population</b>		
		<b>Identified</b>	<b>Acuity</b>	
		N/A	0	
		DV	3	
		Veteran	3	
		Person of Color	3	
		Human Trafficking	3	
		FUSE	3	
		Age 60+	3	
Score 10+ on VI-SPDAT		Score 5-9 on VI-SPDAT		
<b>RRH Chronicity Document Ready</b>		<b>RRH Homeless Document Ready</b>		
<b>Description</b>	<b>Acuity</b>	<b>Description</b>	<b>Acuity</b>	
No	0	No	0	
Yes	10	Yes	10	
<b>Special Medical/Physical Considerations</b>				
<b>Acuity</b>	<b>Description</b>			
0	No Additional Considerations			
1	Vulnerabilities causing Mild Risk of Harm			
2	Vulnerabilities causing Moderate Risk of Harm			
3	Vulnerabilities causing Severe Risk of Harm			



Individual PSH Acuity Scoring Legend

VI - SPDAT	
Score	Acuity
0	0
1	0
2	0
3	0
4	0
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
15	15
16	16
17	17

LoH (Current Episode)		
Min	Max	Acuity
-	1 year	0
1 year	3 years	1
4 years	7 years	2
8 years	11 years	3
12 years	15 years	4
16 years	19 years	5
20 years	-	6

Special Population	
Identified	Acuity
N/A	0
DV	3
Veteran	3
Person of Color	3
Human Trafficking	3
FUSE	3
Age 60+	3

Chronicity Document Ready	
Description	Acuity
No	0
Yes	35

Special Medical/Physical Considerations	
Acuity	Description
0	No Additional Considerations
1	Vulnerabilities causing Mild Risk of Harm
2	Vulnerabilities causing Moderate Risk of Harm
3	Vulnerabilities causing Severe Risk of Harm

**Youth Prioritization Acuity Scoring: (This criteria pertains to Individual Youth ages 18-24, Parenting Youth are scored using Family Criteria)**

The following indicators and associated scores are used to calculate an individual's final score:

- TAY VI-SPDAT Score: Value ranges from 0 – 17 possible points
- Chronic Mental Illness: 0 = Clients with no chronic mental illness, 2 = Clients with a treated chronic mental health illness, 5 = Clients with an untreated chronic mental health illness.
- Exposure to Violence Home/Community: 0 = Clients who haven't had any exposure to violence in their home or community. 3 = Clients who have had exposure to violence in their home/community.
- LGBTQ+: Clients who identify as LGBTQ+ are given 1 point.
- Person of Color: Clients who identify as a person of color are given 1 point.
- Length of time for current episode of Homelessness: 1 = 1 Day – 5 Days, 2 = 6 Days – 10 Days, 3 = 11 Days – 15 Days, 4 = 16 Days – 20 Days, 5 = 21+ Days
- Chronic Health (Medical) Issues: 0 = Clients with no chronic health (medical) issues, 2 = Clients with treated chronic health (medical) issues, 5 = Clients with an untreated chronic health (medical) issues

TAY VI-SPDAT + Chronic Mental Illness + Exposure to Violence Home/Community + LGBTQ + Person of Color + Length of Time Homelessness + Chronic Health (Medical) Issues = Total Score

The indicator scores are added to calculate the final score. The youth acuity list ranked in order from highest score to lowest. The highest score will have priority for housing intervention.

Days of homelessness will be used as a tiebreaker for clients with the same score.

Individuals will become inactive on the acuity list for the following reasons: Permanently housed, Relocated out of the State, Outreach and Navigation have been unable to make contact in last 90 days, or if person is deceased. Youth can be active again following resuming contact with Navigation or Outreach.

Youth PSH:

For PSH, youth will be scored using the same criteria as RRH as long as they meet the following three requirements:

1. TAY-VI-SPDAT Score 8+
2. Disabling Condition
3. Chronically Homeless

- i. If there are no youth that meet the Chronic Definition, youth with most days homeless will be prioritized.

Youth (18-24) RRH/PSH Acuity Scoring Legend				
<b>TAY VI – SPDAT (Must score 24+ on Y-SPDAT for PSH)</b>		<b>LoH (Current Episode)</b>		
<b>Score</b>	<b>Acuity</b>	<b>Min</b>	<b>Max</b>	<b>Acuity</b>
0	0	1 Day	5 Days	1
1	1	6 Days	10 Days	2
2	2	11 Days	15 Days	4
3	3	16 Days	20 Days	3
4	4	21 Days	-	5
5	5			
6	6			
7	7			
8	8			
9	9			
10	10			
11	11			
12	12			
13	13			
14	14			
15	15			
16	16			
17	17			
<b>Chronic Mental Illness</b>				
<b>Identified</b>		<b>Acuity</b>		
N/A		0		
Yes, with Treatment		2		
Yes, no Treatment		5		
<b>Chronic Health (Medical) Issues</b>				
<b>Description</b>		<b>Acuity</b>		
None		0		
Yes, with Treatment		2		
Yes, no Treatment		5		
<b>Exposure to Violence Home/Community</b>				
<b>Description</b>	<b>Acuity</b>			
No	0			
Yes	3			
<b>Special Population</b>				
<b>Description</b>		<b>Acuity</b>		
Identify as LGBTQ+, Gender Identity or Sexual Orientation		1		
Identify as Person of Color		1		
Experience Human Trafficking		1		
<i><b>*FOR PSH: If scores are the same, case conferencing will be done with HHA partners to make decision of who is placed*</b></i>				

**Family Prioritization Acuity Scoring: (This criteria pertains to Veterans, Parenting Youth, and Individuals with children Fleeing DV)**

The **Family Acuity List** includes all families screened by the Lewis Center and meet the Category 1 Homeless (HUD) definition. These families are screened using the VI-F-SPDAT and Referral for services is given based on Score. Those who score a 4+ are scheduled for a Clearance & Assessment that includes bringing in documents to verify client's homeless status, PBC residency, custody of children, and income. This intake appointment also includes a short assessment to help gather any additional information regarding barriers to obtain permanent housing.

Clients are included in the **Shelter Prioritization List** after intake appointment and prioritized for shelter based on the Acuity Score made up of the following factors: Length of Homelessness, VI-F-SPDAT Score, and Special Population. Clients are scored on a scale of 0-4 in the first two (2) categories and are awarded an extra three (3) points if they are part of a special population. The scores are weighted (using key) and then added together creating an Acuity Score. Clients will be prioritized based on this sum. Clients categorized as chronically homeless receive priority. Additional considerations are made for those who are about to give birth or just given birth, have chronic health issues, or have a reunification plan through DCF that requires them to be sheltered.

Family Shelter/RRH Acuity Scoring Legend				
LoH (Current Episode)			Special Population (SP)	
Min	Max	Acuity	0	N/A
0 days	30 days	0	3	- Domestic Violence (last 3 months)
1 month	3 months	1		- Veteran
3 months	6 months	2		- Youth
6 months	9 months	3		
9 months	-	4		
VI - F - SPDAT			Weighted Criteria	
Min	Max	Acuity	LOH	3
0	3	0	VI-F-SPDAT	2
4	-	1	SP	1
5	6	2		
7	8	3		

\*client can only score in one Special Population (SP) category



9	17	4
<b>(LoH Acuity(*3)) + (VI-F-SPDAT Acuity(*2)) + SP = Acuity Score</b>		

Clients are included in the **Rapid Rehousing (RRH) Prioritization List** after intake appointment and prioritized based on the Acuity Score below. Clients categorized as chronically homeless receive higher priority. Clients are referred to RRH are based on acuity level, see chart below. **The chart describes the recommendations for the RRH Levels as approved in the PBC RRH Standards.** Clients are referred in cyclical order: level 4, level 3, level 2, level 1. Level 5 RRH will only be included in cyclical order when targeted funding is available. If there are no clients within an acuity range, referrals move to next level in the cycle. Referrals are subject to funding availability and case manager capacity. Clients are closed if two (2) viable units are declined or if they choose to seek permanent housing on their own (i.e. diversion, HA voucher). Clients waiting for a unit in PSH can be housed through RRH and will remain on the list until a PSH unit is available or it is determined the client is managing successfully in this housing option. If RRH programming is deemed most appropriate, the client is moved to inactive on the PSH list at case closure.

<b>Family RRH Levels</b>			
<b>Level</b>	<b>Case Length</b>	<b>Services</b>	<b>Acuity Level</b>
Level 5		30% Adjusted Gross Income (AGI)	18-25
Level 4	12 mos	Subsidy & Case Management	12-18
Level 3	9 mos	Subsidy & Case Management	10-12
Level 2	6 mos	Subsidy & Case Management	5-10
Level 1	3 mos	Subsidy & Case Management	4

A client scoring a 9 or more on the VI-F-SPDAT and who reports a disability, is scheduled for the F-SPDAT. Clients are added to the **Family Permanent Supportive Housing (PSH) Prioritization List** when they present with a disability and their F-SPDAT score is above a 54. Prioritization for PSH is based on a combined weighted PSH Acuity Score, see chart below. Clients categorized as chronically homeless receive higher priority. Clients remain active on the list for one year and then must be re-assessed to remain on the list.

<b>Family PSH Acuity Scoring Legend</b>				
<b>LoH (Current Episode)</b>			<b>Special Population (SP)</b>	
<b>Min</b>	<b>Max</b>	<b>Acuity</b>	<b>0</b>	<b>N/A</b>
0 days	30 days	0	<b>3</b>	- Domestic Violence (last 3 months)
1 month	3 months	1		- Veteran
3 months	6 months	2		- Youth

\*client can only score in one Special Population (SP) category

6 months	9 months	3
9 months	-	4
<b>F - SPDAT</b>		
<b>Min</b>	<b>Max</b>	<b>Acuity</b>
54	60	1
61	67	2
68	75	3
76	80	4
<b>(LoH Acuity(*3)) + (F-SPDAT Acuity(*2)) + SP = PSH Acuity Score</b>		

<b>Weighted Criteria</b>	
LOH	3
F-SPDAT	2
SP	1

**Clients will become inactive** on the acuity list for the following reasons: permanently housed, relocated out of county/state, unable to contact within last 30 days, unable to complete program documentation, children taken out of custody, or if person is deceased.

#### **Documentation of Priority and Chronic Homelessness**

As chronic homeless beds become available, CoC Partners will follow the priority guidelines defined in **Appendix A** (page 26) which are in compliance with CPD-16-11. The CoC Partners must include in all case records an email from the HRC certifying the individual/family is the next on the list with the highest acuity and identify which priority category they meet. Since all CoC beds are funded for Chronic Homeless, the individual or family must meet the definition of Chronic Homelessness (Appendix B) and this must be documented according to Appendix C and included in the each case record. For families only, the placement can initially be completed without the documentation, but it must be obtained within 45 days of admittance. Should the CoC Partner and/or family not be able to document chronic homelessness, the CoC Partner Agency is still in compliance with CPD-16-11 since the CoC has adopted the policy of filling all beds with an individual or family with the highest acuity. If self-certification is required, a Self Certification of Homelessness and Chronic Homelessness is required (**Appendix A**).

#### **PREVENTION / DIVERSION (Category 2 Homeless Definition)**

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According to the National Alliance to End Homelessness, many people seeking homeless assistance still have an opportunity to remain in their current housing situation, whether it is their own housing or the housing of a friend, relative, acquaintance or coworker. In light of this, prevention and shelter diversion are key interventions in the fight to end homelessness. Immediate screening for these possibilities at entry is an important tactic, and can preserve emergency beds for individuals/households that truly have nowhere else to go. Access to rental

subsidies and case management at entry is often enough to ensure the household successfully remains housed.

While prevention and diversion are two separate concepts, they are utilized almost interchangeably in this strategy, as they both focus on preventing homelessness. Prevention targets people at imminent risk of homelessness, diversion targets people as they are applying for entry into shelter, and rapid re-housing targets people who are already homeless.

### **Coordinated Entry for Housing Stability (Formerly Homeless Prevention)**

PBC's CoC is expanding the Coordinated Entry system to include services offered through Housing Stability offices formerly referred to as Prevention. Historically, when individuals and/or families at-risk of homelessness were experiencing a crisis, they sought services on their own. The process included calling a list of service providers in the community oftentimes receiving the same message (ie. no appointments available, no more funds, please call back at a specified time). The CoC determined that this was not a client-centered approach and thus decided to expand the Coordinated Entry process to include at-risk of homelessness individuals and families.

The CoC will begin the expansion as a pilot adding additional navigators to the Coordinated Entry system access point at the Senator Philip D Lewis Center (LC). The pilot will begin with directing the calls and walk-ups from one of the busiest Housing Stability offices. The purpose of launching with one office is to assess the call volume, call flow and to determine if the staff-to-call ratio meets the needs of the community.

Calls made to the office will be directed to Navigation at the LC. Calls received at the LC will follow the same process for homeless calls separated by individuals and families. Navigators are considered Subject Matter Experts and will follow a script when speaking with callers. Navigators will be well versed in diversion strategies. Navigators will also be well versed in the existing resources in the community to meet the needs of the callers. When a navigator has determined the individual or family qualifies for services an appointment will be scheduled at the appropriate office.

The goal of the CoC is to add additional Housing Stability/Prevention offices and other service providers in a manner that does not congest the system, rather ensures an efficient and effective process. The Coordinated Entry system focusing on the Housing Stability will use the County's OSCARRS electronic appointment system for scheduling. Regular reporting will occur to ensure quality service delivery.

Once an individual/household enters into the system, they should be assessed to determine what housing needs they have. To determine which individuals/households are appropriate for prevention/diversion, Navigators can ask applicants a series of questions during the assessment, such as those delineated below:

#### Diversion

##### **Client:**

Clients who are being referred for housing stabilization will be asked:

- Where did you sleep last night? *If they slept somewhere safe where they could potentially stay again, this might mean they are good candidates for diversion*
- What other options do you have for the next few days or week? *Even if there is an option outside of shelter that is only available for a very short time, it worth exploring if this housing resource can be used.*
- (If staying in someone else's housing) What issues exist with you remaining in your current housing situation? Can those issues be resolved with financial assistance, case management, etc? *If the issues can be solved with case management, mediation, or financial assistance (or all of the above), diversion is a good option.*
- (If coming from their own unit) Is it possible/safe to stay in your current housing unit? What resources would you need to do that (financial assistance, case management, mediation, transportation, etc.)? *If the individual or family could stay in their current housing with some assistance, providers should focus on a quick prevention-oriented solution that will keep the individual or family in their unit.*

##### **Providers:**

Referrals to prevention/diversion providers must be at imminent risk of homelessness AND meet the following threshold.

- No appropriate subsequent housing options have been identified;
- The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
- The household lacks support networks needed to obtain immediate housing or remain in its existing housing

##### **HRC Partner Agency:**

The following list includes some, but not all risk factors that may be considered when determining imminent risk of homelessness. VI-SPDAT will be utilized to determine acuity of the risk factors (scores 0-3 for families and 0-3 for individuals):



- Eviction within two weeks from a private dwelling (including housing provided by family or friends)
- Residency in housing that has been condemned by housing officials and is no longer meant for human habitation
- Sudden and significant loss of income
- Sudden and significant increase in utility cost
- Mental health and/or substance abuse issues
- Physical disabilities and other chronic health issues including HIV/AIDS
- Severe housing cost burden (greater than 50% of income for housing costs);
- Homeless in last 12 months
- Young head of household (under 25 with children or pregnant)
- Current or past involvement with child welfare, including foster care
- Pending foreclosure of rental housing
- Extremely low income (less than 30% of AMI );
- High overcrowding (the number of person exceeds health and/or safety standards for housing unit size)
- Past institutional care (prison, treatment facility, hospital)
- Recent traumatic life event, such as death of a spouse or primary care provider, or recent health crisis that prevented the household from meeting its financial responsibilities.
- Credit problems that preclude obtaining of housing or
- Significant amount of medical debt.

Some participants may not be good candidates for diversion programs due to a lack of safe and appropriate housing alternative and require immediate admittance to shelter, e.g. client fleeing domestic violence. A client's safety should always be the top consideration when developing an individual /household referral to a program.

## **RAPID REHOUSING**

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Generally, rapid re-housing is intended to assist eligible participants to quickly obtain and sustain stable, permanent housing. Effective rapid re-housing requires case management and financial assistance, as well as housing search and locations services. Support and duration of service are tailored to meet the needs of each household and each household has a lease in their name and is connected to mainstream resources in the community in which they reside.

### **Clients:**

Eligible households must:

- Be literally homeless as defined by HUD
- Be prepared to establish a reasonable plan that shows how they are going to maintain housing once housing assistance has ended, develop a budget, a financial worksheet and or a narrative description of changes in household circumstances that caused them to become homeless.
- Entry is based on VI-SPDAT Acuity score (highest to lowest) and length of time homeless

### **Providers:**

Providers who are funded for rapid re-housing:

- Will utilize the **“Progressive Engagement”** methodology; that is, providers will determine the amount of rent and utility assistance and/or supportive services that a household will receive using the progressive engagement approach. Household will be asked to identify the minimum amount and duration of assistance needed to achieve housing stability. If it becomes clear that a rapid re-housing intervention is insufficient and or inappropriate for a particular household, the provider will work with the Navigator and/or other housing provider to find a more suitable program.
- Households should be attempted to be housed within 30 days of acceptance into the program.
- Providers are expected to remain engaged with the household from first contact to program exit as per the CoC approved Rapid Re-Housing Standards.

### **CoC Partners:**

The following process will be used to refer clients to any Rapid Re-Housing program. Providers will receive referrals from any of the following sources; provided they have been assessed by the Navigator and all eligibility and vacancy information is up to date in HMIS.

- Coordinated Access Point and/or Outreach Workers
- Shelters
- Transitional Housing Programs

All households being referred for Rapid Re-Housing must be assessed by a Navigator. While they may be identified through other resources, i.e., shelter or transitional housing providers, McKinney-Vento Liaisons in school districts, or other service providers, they will require screening and assessment through the HRC Coordinated Intake and Assessment System. School Liaisons can conduct the VI-SPDAT and provide this information to the Navigator to be included on Rapid Re-Housing Placement Priority List.

- Navigators are responsible for gathering documentation for verification of homeless status.
- All Rapid Re-Housing clients must be entered into HMIS by the Navigator once the provider has confirmed entry into the program. Information should include all HUD required data elements.

## HOUSING AND/OR PROGRAM REFERRAL

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Participants unable to be served by prevention, diversion or rapid re-housing programs will most likely need more intensive housing and service interventions, such as transitional housing or permanent supportive housing. Those fleeing domestic violence that are not eligible or appropriate for prevention and rapid re-housing services may fall into this category of needing more intensive service intervention, and should be referred to a domestic violence provider prior to intake and/or HMIS data entry.

Table 1 below delineates the characteristics of Permanent Support Housing and Transitional Housing Programs.

Characteristics of Transitional Housing & Permanent Supportive Housing Programs

<b>Programs &amp; Characteristics</b>	<b>Transitional Housing</b>	<b>Permanent Supportive Housing</b>	<b>Other Permanent Housing</b>
<b>Length of Stay</b>	Maximum stay 24 months	No time limit	No time limit
<b>Occupancy Agreement or Lease</b>	Participants are clients, not tenants and sign an occupancy or program agreement instead of a lease	Participants have a lease	Participants have an Occupancy Agreement or Lease
<b>Service Requirements</b>	Services are required	Services are optional	Services are optional
<b>Eligibility</b>	Applicant must meet HUD's definition of homeless	Applicant must meet HUD's definition of homeless and member of the household must have a disabling condition	Applicant must meet HUD's and/or other federal definition of homeless

### **Provider:**

**Transitional Housing:** programs that provide housing to individuals and/or families, usually for a period of four to twenty-four months, along with supportive services to help them become self-sufficient. In addition to providing a place to live, transitional housing providers should help participants to increase their life management skills and resolve the problems that have contributed to their homelessness. Individuals/Households who are homeless and have two or more of the following barriers are appropriate for referral to Transitional Housing:

- Domestic Violence victims fleeing a domestic violent situation

- youth (18-24)
- No income
- Poor rental history (i.e. current eviction, rent/utility arrears)
- Sporadic employment history
- No high school diploma or GED
- History of homelessness

**Permanent Supportive Housing:** Permanent Supportive Housing targets individuals/households who need services in order to maintain housing. Prioritization is given to chronic homeless and/or those with the highest level of vulnerability as per HUD. As a minimum, candidates for Permanent Supportive Housing must meet the following basic requirements:

- Literally homeless
- chronic homelessness
- Lacks the resources to obtain housing
- Has a member of the household with a severe or significant disabling condition
- Qualifies as a high need based on the SPDAT

**CoC Partner Agencies:**

The navigator or other appropriate staff such as Outreach Workers or Diversion Specialist can provide: needed housing navigation services, frequent communication with the client and serves as the primary liaison between the client and the housing provider. The CoC Partner Agency is responsible for overseeing and ensuring that:

- Advocacy and services to collect required housing documentation are provided
- A climate of trust is created and maintained between clients and navigators.
- A current housing inventory is maintained within HMIS
- Clients are housed based upon a prioritization determination; that is, those who score according to the identified criteria as the most vulnerable will be prioritized for housing depending on the availability of housing and services. Legacy programs with beds not dedicated to Chronic Homeless must prioritize the beds for Chronic Homeless Individuals and Families as beds become available.

If the Partner Agency evaluates a client for their bed and questions whether their program fits the needs of the client, they must staff the case with the existing Housing First Providers and a consensus reached that the placement not accepted must be considered in another program. If this occurs, then the Housing First Program with the bed will accept the next person on the priority list and the first individual will be placed in the next available bed in Housing First Program deemed most appropriate.



## **UNACCOMPANIED YOUTH AND TRANSITION AGE YOUTH**

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Unaccompanied youth is a fast growing and underserved sub- population, in our community.

### **Clients:**

Unaccompanied Youth (ages 13-17) and Transition Age Youth (ages 18-24) are defined as youth and transition age youth who are unaccompanied by a parent or guardian and are without shelter where appropriate care and supervision are available, whose parent or guardian is unable or unwilling to provide shelter and care, or who lack a fixed, regular and adequate nighttime residence. Undocumented unaccompanied youth and transition age youth may also be served under these provisions except where exclusions are noted. Unaccompanied youth may be encountered during outreach but would not enter the Homeless Resource Center due to their age. City provisions prevent anyone under 18 from entering the program unless they had legally been as an emancipated as an adult. Those under 18 would be connected to the appropriate program based on their age and circumstances.

### **Providers:**

Providers of services for unaccompanied youth and transition age youth should be able to provide safe and high quality housing and supportive services (scattered-site independent apartments, host homes, and shared housing) to youth and transition age youth experiencing homelessness that involve integrated affordable housing, intensive strength-based case management, self-sufficiency services, trauma informed care, and positive youth development approaches.

### **HRC Agency:**

All housing referrals for unaccompanied youth and transition age youth must be screened and assessed. The HRC Agency is responsible for overseeing and ensuring that:

- Transition Age Youth willingly engage with coordinated intake for a screening and when appropriate, a TAY-SPDAT.
- Low barriers of entry for this highly vulnerable population are necessary.
- Navigators consult with expert providers of this population when conducting intake to properly match clients and providers, and reduce the risk of flight for this highly vulnerable population.

## **PROGRAM EVALUATION**

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Coordinated Intake and Assessment is one of many projects within our community that addresses the needs of individuals and families that are at risk or experiencing homelessness within our communities. The HRC Partner Agencies will evaluate the effectiveness as well as

required HEARTH Act outcomes by utilizing data from HMIS. As recommended by the National Alliance to End Homelessness, the HRC Partner Agencies will track progress in the following areas to evaluate the Coordinated Intake and Assessment process:

- Length of stay, particularly in shelter: If participants are referred to the right interventions and those interventions have the necessary capacity, fewer individuals and families should be staying in shelter waiting to be moved elsewhere. Also if clients are referred immediately to the right provider, over time, clients will likely spend less time jumping from program to program looking for help, which could reduce their overall length and/or repeated episodes of homelessness.
- New entries into homelessness: if every individual and family seeking assistance come through the front door and the front door has prevention and diversion resources available, more people should be able to access these resources and avoid entering a program unnecessarily.
- Repeat episodes of homelessness: If clients are sent to the intervention that is the best suited to meet their needs on the first time, families are more likely to remain stably housed.

To track the outcomes summarized above, the CoC Lead Agency will analyze the following Performance Measures annually.

- 1) PBC CoC will reduce the number of person experiencing homelessness.
  - a. Reduction in the total number of persons experiencing homelessness
  - b. Reduction in the total number of persons experiencing first time homelessness.
- 2) PBC CoC will reduce the length of homelessness episodes
  - a. Reduction in the mean length of homelessness episode for individuals
  - b. Reduction in the mean length of homelessness episode for families with children
  - c. Reduction in the mean length of homelessness episode for youth
- 3) PBC CoC will reduce the number of persons returning to homelessness.
  - a. Reduction in return to homelessness within one year following exit
  - b. Increase in exits to permanent housing
  - c. Increase in income at exit

Measuring the success of this system and transparency with the community and providers will be a key to the success of coordinated assessment process. The CoC Lead Agency will summarize the data annually. The performance measures are utilized for all CoC programs regardless of funding source. For CoC funded and ESG funded programs, these criteria will be utilized for consideration for renewal or new projects based on the program type.

Moving forward, the CoC Lead Agency will expand the evaluation of outcomes by establishing mechanisms to monitor the quality of service through system-wide monitoring. For example, once a client enters shelter an assessment is to be completed within 72 hours. Procedures will be built into the monitoring system to determine how often this goal is met. This will allow for ongoing monitoring of the quality of services and how the program and Providers are able to follow through with this goal.

As part of the evaluation process, as recommended by the National Alliance to End Homelessness, the CoC Lead Agency will set a goal to establish an integrated feedback loop that involves using information gained from these assessments to make any necessary program/process adjustments to the system. Additionally, the CoC Lead Agency will continue working to develop data tools to ensure overall system efficiency and effectiveness.

**Adopt by Homeless and Housing Alliance Membership-July 18, 2019**

**Ratified by Homeless & Homeless Alliance Executive Committee July 17, 2019 via email vote**

**Reviewed & Updated by Standards Policies & Procedures Committee – July 9, 2019**

**Adopted by Homeless and Housing Alliance Membership – May 26, 2018**

**Adopted by Homeless and Housing Alliance Membership – August 24, 2017**

**Reviewed & Updated by Homeless & Housing Alliance Membership – March 23, 2016**

**Ratified by Homeless & Housing Alliance Executive Committee -February 23, 2015**

**Adopted by Homeless & Housing Alliance Membership - February 26, 2015**

## **Appendix A**

### **Palm Beach County Continuum of Care Chronic Homelessness Prioritization**

#### **(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs**

An individual or family that is eligible for CoC Program-funded PSH who has experienced four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter or where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.

#### **(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.**

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

There are no chronically homeless households that meet the criteria for dedicated PSH beds in Order of Priority1.

#### **(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.**

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

There are no chronically homeless households that meet the criteria for dedicated PSH beds in Order of Priority1 or 2.

#### **(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.**

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting

to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

There are no chronically homeless households that meet the criteria for dedicated PSH beds in Order of Priority 1, 2 or 3.

CoC Program-funded PSH must follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority as adopted by the CoC, to the extent in which youth meet the stated criteria.

CoC Grantees must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see FAQ 1895). CoC Program-funded PSH must follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

### **Chronic Homeless Definition**

Chronically Homeless: The definition of “chronically homeless” currently in effect for the CoC Program is that which is defined in the CoC Program interim rule at 24 CFR 578.3, which states that a chronically homeless person is:

An individual who:

- Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and



- Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

An individual who:

- Has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days;
- Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
- Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

A family with an adult head of household (or if there is no adult in the family, a minor head of household) including a family whose composition has fluctuated while the head of household has been homeless who:

- Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
- Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

#### Severity of Service Needs

Individual or Family for whom at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.

Severe service needs should be identified and verified through data-driven methods through the use of a standardized assessment tool that can identify the severity of needs such as the Vulnerability Index (VI), the Service Prioritization Decision Assistance Tool (SPDAT)

#### Documentation of Disability:

Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

Evidence of this criterion must include one of the following:

- 1) Written verification of the condition from a professional licensed by the state to diagnose and treat the condition;
- 2) Written verification from the Social Security Administration;
- 3) Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation);
- 4) Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed within 45 days of the application for assistance and accompanied with one of the types of evidence above; or
- 5) HUD Verification of Disability Form from a MD, DO, LCPC, LCSW, APRN-BC, or NP.

#### Documentation of Chronic Homelessness

**Chronic Homelessness:** An individual or household must have had either one occasion that lasted continuously without a break for 12 months or over a period of at least four occasions, each separated by a break where cumulative length of time homeless totals at least 12 months.

**Written Intake Procedures** to ensure compliance with the definition of chronically homeless the order of priority for obtaining evidence as: (1) third-party documentation, (2) intake worker observations, and (3) certification from the person seeking assistance. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.

**Duration of homelessness:**

Evidence that the homeless occasion was continuous, for at least one year: documentation that the homeless occasion was continuous, for a year period, without a break in living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter.

- A break is considered at least seven or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.
- A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month.

Evidence that the household experienced at least four separate homeless occasions over 3 years: evidence that the head of household or an individual experienced at least four, separate, occasions of homelessness in the past 3 years.

- Documentation preference is for at least three occasions to be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Any other occasion may be documented by a self-certification with no other supporting documentation.
- HUD will permit a certification from the individual or head of household seeking assistance in place of third-party documentation for the three occasions that must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and must document efforts made to obtain third-party evidence, and document of the severity of the situation in which the individual has been living.

**Is there a minimum number of days in which a person must be homeless in order for that period to count as an occasion?** No. In order to provide the maximum extent of flexibility to communities, HUD has not required that a single occasion of homelessness must total a certain number of days. Instead, HUD would consider an occasion to be any period of homelessness where the household resided in a place not meant for human habitation, an emergency shelter, or a safe haven where that period was demarcated by a break, defined as at least 7 or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.



**PALM BEACH COUNTY  
HOMELESS AND HOUSING ALLIANCE  
RAPID RE-HOUSING PROGRAM  
STANDARDS**



## Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
<p><b>Level 1--</b> The <b>household</b> will need minimal assistance to obtain and retain housing. The Rapid Re-Housing (RRH) program offers the following for most Level 1 households:</p> <ul style="list-style-type: none"> <li>❖ Initial consultation related to housing search (e.g. where to find rental information, how to complete housing applications, documentation needed)</li> <li>❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.)</li> <li>❖ Time-limited rental assistance, per client Housing Plan</li> <li>❖ Home visit/check-in after move-in</li> <li>❖ Offer services (at tenant request) for up to 3 months (100% first, last, security) 2<sup>nd</sup>-75% subsidy 3<sup>rd</sup> -50% subsidy</li> </ul> <p><b>Landlord</b> assistance will likely include only program contact information for tenancy concerns</p>	<p>Household has no criminal history</p> <p>Rental history: an established local rental history. No evictions, landlord references are fair to good.</p> <p>Credit history is good, with the exception of a few late utility and credit payments</p>	<p>No significant barriers except financial: very low income, insufficient emergency reserves</p>
<p><b>Level 2—</b> The <b>household</b> will need routine assistance to obtain and retain housing. The RRH program offers the following for most Level 2 households:</p>	<p>Household has no serious criminal history but may have a few offenses such as moving violations, a DUI, or a misdemeanor.</p> <p>Rental history is limited or out-of state. May have 1-2 explainable evictions for non-payment. Prior landlords may report a problem with the timely rent.</p>	<p>Financial barriers include low to very low income, may have inconsistent employment, and/or poor budgeting skills.</p> <p>No serious mental illness or chemical dependency that affects housing retention. May have some level of depression/anxiety or problems responding to conflict.</p>



## Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
<ul style="list-style-type: none"> <li>❖ Initial consultation and ongoing assistance with housing search including transportation assistance as needed</li> <li>❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.)</li> <li>❖ Time-limited rental assistance, per client Housing plan</li> <li>❖ Development of Housing Plan to work on any identified retention barriers</li> <li>❖ Bi-weekly home visits for the first three months; then reduce to monthly as most Housing Plan goals are met.</li> <li>❖ Services available for up to 6 months, depending on housing challenges and progress toward Housing Plan goals. (100%- First, last &amp; security) 2<sup>nd</sup> – 100% 3<sup>rd</sup> – 75% 4<sup>th</sup> – 50% 5<sup>th</sup> – 25% 6<sup>th</sup> – 25%</li> </ul> <p><b>Landlord</b> assistance:</p> <ul style="list-style-type: none"> <li>❖ 6 months availability: landlord can call with tenancy issues and program will respond.</li> <li>❖ Program will check in with landlord periodically for updates.</li> </ul>	<p>Credit history shows pattern of late or missed payments.</p>	<p>May lack awareness of landlord-tenant rights/responsibilities.</p> <p>May have minor problems meeting basic household care/cleaning</p> <p>May have been homeless once before.</p>

## Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
<p><b>Level 3 –</b> The <b>household</b> will need more intensive and/or longer assistance to obtain and retain housing. The RRH program offers the following for most Level 3 households:</p> <ul style="list-style-type: none"> <li>❖ Initial consultation and ongoing assistance with housing search. Staff may accompany client to the landlord interview.</li> <li>❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.)</li> <li>❖ Time-limited rental assistance, per client Housing Plan</li> <li>❖ Development of Housing Plan to work on any identified retention barriers</li> <li>❖ Weekly home visits for first two months; then reduce to bi-weekly or monthly home visits for up to six months; then reduce to monthly as most Housing Plan goals are met. Include unannounced drop-in visits.</li> <li>❖ Services available for up to 9 months, depending on housing challenges and progress toward Housing Plan goals. (100% first, last, security) 2<sup>nd</sup> – 100% 3<sup>rd</sup> – 100% 4<sup>th</sup> – 75% 5<sup>th</sup> – 75% 6<sup>th</sup> – 50% 7<sup>th</sup> – 50% 8<sup>th</sup> – 25% 9<sup>th</sup> – 25%</li> </ul>	<p>Household may have some criminal history, but none involving drugs or serious crimes against persons or property.</p> <p>Rental history includes up to 3 evictions for non-payment. Prior landlord references fair to poor. Partial damage deposit returned. Some complaints by other tenants for noise.</p> <p>Credit history includes late payments and possible court judgments for debt, closed accounts.</p>	<p>May have deficits in care of apartment, landlord-tenant rights/responsibilities, communication skills with landlord and/or other tenants</p> <p>Conflict may exist in household.</p> <p>May have lost housing and been homeless several times in the past.</p>

## Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
<p>Level 3 – (cont'd)</p> <p><b>Landlord</b> assistance:</p> <ul style="list-style-type: none"> <li>❖ 9 month availability; landlord can call with tenancy issues and program will respond even after services end.</li> <li>❖ Program will check in with landlord periodically for updates.</li> </ul>		
<p><b>Level 4—</b></p> <p>The <b>household</b> will need more intensive and longer assistance to obtain and retain housing. The RRH program offers the following for most Level 4 households:</p> <ul style="list-style-type: none"> <li>❖ Initial consultation and ongoing assistance with housing search. Staff may accompany client to the landlord interview.</li> <li>❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.)</li> <li>❖ Time-limited rental assistance, per client Housing Plan</li> <li>❖ Development of Housing Plan to work on any identified retention barriers</li> <li>❖ Weekly home visits for first two months; then reduce to bi-weekly or monthly home visits for up to nine months; then reduce to monthly as most Housing Plan goals are met. Include unannounced drop-in visits.</li> <li>❖ Services available for up to</li> </ul>	<p>Criminal history, violations may include drug offense or crime against person or property</p> <p>Rental history includes up to five evictions for non-payment and/or lease violations. Landlord references poor. Security deposit may have been kept due to damage to unit.</p> <p>Credit history is poor, late payments, may include judgment for debt to landlord, closed accounts</p>	<p>Extremely low income, no emergency reserves, bank account closed, lacks budgeting skills.</p> <p>May be using drugs/alcohol and/or has mental health problems. May have conflict with children or partner. May lack ability to care for apartment or communicate appropriately with landlord and other tenants</p> <p>Has likely been homeless multiple times or for more extended periods</p>

## Palm Beach County Rapid Re-Housing Program Standards

<p>12 months, depending on housing challenges and progress toward Housing Plan goals.  (100% First, last, security)  2<sup>nd</sup> – 100%  3<sup>rd</sup> – 100%  4<sup>th</sup> – 75%  5<sup>th</sup> – 75%  6<sup>th</sup> – 75%  7<sup>th</sup> - 50%  8<sup>th</sup> – 50%  9<sup>th</sup> – 50%  10<sup>th</sup> – 25%  11<sup>th</sup> – 25%  12<sup>th</sup> – 25%</p> <p><b>Landlord assistance:</b></p> <ul style="list-style-type: none"> <li>❖ 12 month availability; landlord can call with tenancy issues and program will respond; ongoing option to call even after Rapid Re-Housing services are ended can be offered or negotiated on a case by case basis.</li> <li>❖ Program will check in with landlord monthly (or more often if landlord prefers) for updates/issues.</li> <li>❖ May pay an additional damage deposit and/or last month's rent in addition to normal start-up costs.</li> </ul>		
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## Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
<p><b>Level 5—</b> Household need longer or more intensive services; may need staff with more professional training. RRH program refers household to appropriate program, such as intensive case management, permanent supportive housing or other local resources.</p> <p>❖ Weekly home visits until PSH is arranged or a determination is made regarding maintaining RRH. Case Management requirements would then mirror Level 4's.</p> <ul style="list-style-type: none"> <li>• (Hold until PSH is available)</li> <li>• First, security (month to month lease)</li> <li>• 30% of adjusted gross income in preparation for PSH</li> <li>• Financial assets – Month 2 difference between 30% cost of rent.</li> </ul>	<p>Extensive criminal background</p> <p>Extremely poor rental history, multiple evictions, serious damage to apartment, complaints.</p> <p>Credit history includes multiple judgments, unpaid debts to landlords, closed accounts.</p>	<p>Active and serious chemical dependency or mental illness</p> <p>Unable to comply with lease requirements or interact positively with landlord/tenants; poor apartment management skills, out-of-control behaviors by adults or children</p> <p>May have experienced chronic homelessness (multiple and/or extended periods of homelessness)</p>



## **Palm Beach County Rapid Re-Housing Program Standards**

### **General Rapid Re-Housing Standards:**

If a participant calls for additional services after exit, the following applies:

- If they are still housed but need financial assistance to maintain housing, they will be referred for assistance to the agencies that provide prevention services.
- If they become homeless again, a new SPDAT must be completed and added to the priority listing based on the SPDAT score. There is no wait time or limited number of times that a participant may be served under the Rapid Re-Housing Component.
- Addendum to the Lease regarding Quality Standard Inspection repair timeframes. The Case Manager and/or Housing Specialist will discuss the Addendum to the Lease regarding Quality Standard Inspection repair timeframes (**Appendix A**) prior to participant signing. This addendum will be signed at the time of the lease to ensure the unit meets Housing Quality Standards at all times. Should the landlord fail to meet the timeframes outlined in the Addendum, then the Case Manager will arrange to move the participant as quickly as possible.
- Addendum for Violence Against Women's Act (VAWA) (Form HUD-91067) is signed;
- Certification of Domestic Violence Form should be given at each lease signing and in the case of termination, in accordance with Violence Against Women's Act (VAWA) (**Appendix B**);
- Initial referrals to RRH programs will be entered as a service call "Housing Search" to capture all referral information regardless of whether the participant actually enters the program. If the participant actually enters the program, then the start date would need to be backdated to the actual date the housing search begin to ensure data related to length of time from housing search and move in is reflected correctly. For those who do not enter, then the reasons will be captured at the closure of the service. Back dating entry into the program ensures the data collected for the CAPER and APR only includes information on those who enter.

### **SPDAT Requirements:**

The SPDAT and its 15 components of review are the primary assessment tool used at intake assessment and at the predetermined intervals of service delivery (at move in, 30 days, 90 days, 180 days, 270 days, 365 days as well as changes in life circumstances  $\pm$  5 business days).

**Adopted by Homeless & Housing Alliance Membership-July 18, 2019**

**Ratified by Homeless & Housing Alliance Executive Committee-July 17, 2019**

**Reviewed & Updated by Standard Policy and Procedures Committee – July 9, 2019**

**Adopted by Homeless & Housing Alliance Membership – October 2018**

**Reviewed & Updated by Standard Policy and Procedures Committee – October 9, 2018**

**Reviewed & Updated by Homeless and Housing Alliance – April 26, 2018**

**Reviewed & Updated by Homeless and Housing Alliance July 27, 2017**

**Reviewed & Updated by Homeless and Housing Alliance – July 28, 2016**

**Adopted by Homeless & Housing Alliance Membership- July 23, 2015**

**Reviewed and Updated July 2, 2015 by Standard Policy and Procedures Committee**

**Ratified by Homeless & Housing Alliance Executive Committee -February 23, 2015**

**Adopted by Homeless & Housing Alliance Membership - February 26, 2015**

## Palm Beach County Rapid Re-Housing Program Standards

### Appendix A

Addendum to the Residential lease between \_\_\_\_\_  
(Landlord)

And \_\_\_\_\_ for the apartment located at  
(Tenant)

\_\_\_\_\_  
(Location)

The above reference apartment is a \_\_\_\_\_ and is leased at a rate  
(#of bedrooms & baths)

equal or less than other comparable units in the complex.

Tenant has the right to terminate the lease in the event that HUD funding is discontinued or if the landlord fails to keep the property in compliance with HUD Quality Standard Inspection requirements. The landlord will have 30 days to correct the Quality Standards Deficiencies following notification of the actual problems with the property unless the issue affects immediate safety of the resident. According to HUD guidelines an emergency (life threatening) violation must be corrected within 24 hours.

\_\_\_\_\_  
Signature of Leasing Agent/Landlord

\_\_\_\_\_  
Date

## Palm Beach County Rapid Re-Housing Program Standards

### Appendix B

**CERTIFICATION OF U.S. Department of Housing  
DOMESTIC VIOLENCE, and Urban Development  
SEXUAL ASSAULT, OR STALKING,  
AND ALTERNATE DOCUMENTATION**

OMB Approval No. 2577-0286

**Purpose of Form:** The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

**Use of This Optional Form:** If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

(1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.

(2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or

(3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

**Submission of Documentation:** The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date

## **Palm Beach County Rapid Re-Housing Program Standards**

provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

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**Client Signature**

---

**Date**



## **Palm Beach County Continuum of Care**

### **Emergency Shelter Standards of Care**





## I. INTRODUCTION

Emergency Shelter Standards maintain that homeless individuals and families living in emergency housing are ensured:

- a safe environment
- housing focused case management
- rapid access to Permanent Housing
- treatment with dignity and respect
- placement of all family members together
- service delivery regardless of presenting barriers
- provision of housing and related services without regard to race, color, religion, disability, sex, age, national origin, ancestry, marital status, familial status, sexual orientation, gender identity and expression, or genetic information.
- the right to dress in accordance with the gender with which they self-identify
- receive services/support consistent with their self-identified gender

**Gender minorities** may include individuals whose gender identity and/or gender expression may be different from their assigned gender at birth irrespective of physical appearance, surgical status, or documentation of identity.

## II. GUIDING PRINCIPLES

### **Housing Focused Service Delivery Components Provided in Emergency Shelter**

Homelessness is first and foremost a housing problem and should be treated as such. As such, the guiding principle of emergency shelter services is permanent housing. The principal components of Housing Focused Service Delivery in Emergency Shelter are:

- ***Housing, Resource, and Support Services Assessment*** which focuses on housing needs, preferences, and barriers; resource acquisition (e.g., entitlements); and identification of services needed to sustain housing
- ***Housing placement assistance*** including housing location and placement; financial assistance with housing costs (e.g., security deposit, first month's rent, move-in and utilities connection, short- or long-term housing subsidies); advocacy and assistance in addressing housing barriers (e.g., poor credit history or debt, prior eviction, criminal conviction)
- ***Case management services*** (frequently time-limited) specifically focused on obtaining and sustaining permanent housing

### **Other Guiding Principals**

The health and safety of clients, volunteers and staff is of the highest importance in each Emergency Housing facility. Training, policies, procedures and regular maintenance are intended to encourage, improve and maintain the health and safety of all people residing, volunteering and working in the emergency housing.

In order to provide effective emergency housing programs and services, emergency housing clients should be afforded the opportunity to have a voice in service provision, program planning, and policy development.

Emergency housing programs are part of a larger network of homeless services and agencies. Collaboration within this network is important to ensure effective and co-coordinated services.

People who are homeless should be stabilized in permanent housing as quickly as possible and connected to resources necessary to sustain that housing.

Case Managers will meet at least weekly with their clients as well as maintain phone contact as they progress towards obtaining permanent housing.

Clients shall be moved into housing as rapidly as possible.

Compliance with the Emergency Housing Standards will be a contract requirement and apply to all contracted emergency housing providers/facilities.

### **III. CLIENT RIGHTS AND RESPONSIBILITIES**

Emergency Shelter Staff must review with all Clients, the “Rights and Responsibilities and Grievance Procedures” during the initial intake and housing orientation. Staff must also review specific house rules which may include the following:

1. Smoking (where, when)
2. Curfew hours/overnight absences
3. Safety Issues
4. Authorized household members
5. Unauthorized visitors
6. Responsibility for personal belongings
7. Program/treatment related issues
8. Medication- storage and dispensing
9. Expectations of participation in treatment
10. Meals
11. House meetings
12. Other rules: curfew, phone use, lights out, and television/radio use (for Family emergency housings) parental responsibility for children at all times, etc.

After the Client has read (or been provided assistance to read) the “Clients Rights and Responsibilities and Grievance Procedures”, consumers must sign the document. One copy must be given to the Client and the second must be kept on file.

#### **IV. BASIC STANDARDS FOR EMERGENCY HOMELESS SHELTERS**

##### **ADMINISTRATION**

1. The shelter operated by a non-profit organization, must be recognized under section 501(c)(3) of the Internal Revenue Code.
2. The shelter shall not require clients to participate in religious services or other forms of religious expression.
3. The Agency's Board of Directors shall meet at least on a regular basis.
4. The shelter shall have a secure storage space for confidential documents relating to clients and personnel.
5. The shelter shall develop -and implement procedures to ensure the confidentiality of records pertaining to any individuals provided family violence prevention or treatment services.
6. The shelter shall have a policy manual which includes the shelter's purpose, population served, program description, non-discrimination policy and confidentiality statement.
7. The shelter shall provide for an evaluation of the effectiveness of the services offered, at least annually.

##### **PERSONNEL**

1. The shelter shall have a Organizational Chart of all paid staff working in the shelter. There shall be written position descriptions for each position type, which includes job responsibilities and qualifications.
2. The shelter shall have trained, on-site staff coverage during all hours the shelter is open to residents, unless individual secured units are provided.
3. All shelter staff shall receive training in at least the following:
  - a. emergency evacuation procedures
  - b. agency operating procedures
  - c. first aid procedures
  - d. CPR
  - e. AED
  - f. SPDAT Certification
4. All direct service staff shall receive additional training in at least the following:
  - a. de-escalation training;
  - b. referral procedures to relevant community resources
  - c. Cultural Competency
5. Emergency Shelter Providers must have written Policies and Procedures that include:
  - A. **DRUG-FREE WORKPLACE**  
Written drug and alcohol policies for its employees that include the following:
    - a. Drug and alcohol free workplace
    - b. Remediation for the use and/or distribution of illegal substances

## **B. CRIMINAL RECORD CHECKS AND CHILD ABUSE CLEARANCES**

**Single Adult Providers:** All program staff and volunteers must obtain Level 2 criminal record checks *prior to hire and at five (5) year intervals thereafter.*

**Family Providers:** All program staff and volunteers in emergency housing programs serving children must obtain Level 2 criminal record checks *prior to hire and at five (5) year intervals thereafter.*

## **FACILITY**

1. The shelter shall comply with applicable local fire, environmental, health, and safety standards and regulations.
2. The shelter shall be clean and in good repair.
3. The shelter shall have reasonable access to transportation services.
4. The shelter will accommodate family members together without separating them
5. The shelter shall provide a bed or crib for each guest. The shelter shall make provision for clean linens for each client. There shall be procedures to provide for the sanitizing of all linens and sleeping surfaces.
6. The shelter shall provide sufficient showers/baths, wash basins and toilets which are in proper operating condition for personal hygiene. These should be adequate for the number of people served. Clean towels, soap and toilet tissue shall be available to each client.
7. The shelter shall have private space to meet with clients.
8. The shelter shall have laundry facilities available to clients or a system available for like services.
9. The shelter shall have a fire safety plan which includes at least the following:
  - a. posted evacuation plan
  - b. fire drills, conducted at least quarterly
  - c. fire detection systems which conform to local building and fire codes
  - d. adequate fire exits
  - e. adequate emergency lighting
10. The shelter shall have adequate provision of the following services:
  - a. pest control services
  - b. removal of garbage
  - c. proper ventilation and heating/cooling systems
  - d. to ensure that entrances, exits, steps and walkways are kept clear of garbage and other debris, or hazards
11. The facility is in compliance with applicable provisions of the Americans with Disabilities Act. There is a written plan for reasonable accommodation of persons with disabilities.
12. The shelter shall make every effort to accommodate clients based on the gender in which they identify as it relates to accessing the bathing, toileting and dressing.
13. The shelter shall take into account, client's safety when placing and assigning them to a bed or a room.

## **FISCAL MANAGEMENT**

1. There shall be an accounting system which is maintained in accordance with Generally Accepted Accounting Principles (GAAP).

2. The shelter shall have a record of accountability for client's funds or valuables the shelter is holding.
3. The shelter shall receive an annual independent audit or audit review.
4. The shelter shall have internal fiscal control procedures which are reviewed and approved by the Operating Agency Board of Directors.
5. The Operating Agency has the following insurance provisions, notices and certificates and upon request shall furnish certificates evidencing the existence of the following:
  - Worker's Compensation Certificate
  - Wage and Hour Notice
  - Unemployment Liability (if applicable)
  - Professional Liability
  - Director and Officers Liability is encouraged. Board members are informed of liability.
  - Property/Casualty for agency-owned property

### **FOOD SERVICE**

1. Shelters providing food service shall make adequate provisions for the sanitary storage and preparation of foods.
2. Shelters providing food for infants, young children and pregnant mothers shall make provisions to meet their nutritional needs.
3. Shelters shall provide, or arrange food services to clients or make known the available services nearby.
4. Shelters preparing food and serving food shall have staff complete Food Handling Certification

### **HEALTH**

1. The shelter shall have available at all times first aid equipment and supplies in case of a medical emergency.
2. All staff on duty shall have access to a telephone. Emergency telephone numbers shall be posted conspicuously near the telephone.
3. The shelter shall assure that at least one staff person on duty is trained in emergency first aid procedures.
4. The shelter shall have a procedure for making referrals to appropriate medical providers.
5. The shelter shall have a written policy regarding the possession and use of controlled substances as well as prescription and over the counter medication.
6. The shelter shall have a written policy regarding the control of infectious diseases, such as HIV, tuberculosis, etc.
7. The shelter shall provide a locked place for the storage of medications.

### **OPERATIONS**

1. In addition to sleeping arrangements and food, the shelter shall provide the following basic needs:
  - a. humane care which preserves the individual dignity
  - b. a clean environment
  - c reasonable security
  - d. referrals to other agencies



2. The shelter shall have written policies for intake of clients and criteria for admitting people to the shelter.
3. The shelter shall maintain an attendance list which includes, at least, the name and sex of each person residing in the shelter.
4. The shelter shall post and read, or otherwise make known, the rules, regulations and procedures of the shelter.
5. The shelter shall post and read, or otherwise make known, the rights and responsibilities of shelter clients that shall include a grievance procedure for addressing potential violations of their rights.
6. The shelter shall report elder, disabled adult and child abuse and endangerment as required by law.
7. The shelter may only require clients to perform duties directly related to daily scheduled chores within the shelter and not require participation in activities that would benefit the organization.
8. The shelter shall provide access to a public or private telephone for use by shelter clients to make and receive calls.
9. The shelter shall maintain records to document services provided to each client.
10. The shelter shall provide accommodations for shelter clients to store personal belongings.
11. The shelter shall provide a safe, secure environment and have policies to regulate access.
12. The shelter shall have an approved policy for storing client medications that outlines safeguarding medications. A labeled refrigerator must be available for medications requiring refrigeration.
13. The shelter shall encourage the involvement of clients in the decision making processes of the shelter. This can be accomplished in a variety of ways, including having resident advisory councils to give input into the operations of the shelter, or having homeless or formerly homeless people on the board, or having homeless or formerly homeless people trained and hired as staff, or input from clients through suggestion boxes or exit surveys, etc.
14. The shelter shall allow current clients to use the shelter as a legal residence for the purpose of voter registration and the receipt of public benefits.
15. The shelter shall maintain a daily log to record at a minimum all unusual or significant incidents.
16. The shelter shall have written policies for consensual and nonconsensual searches.
17. The shelter has a policy, as well as a procedure, which addresses ADA compliance. The shelter can describe plan for accommodating persons with disabilities.
18. The shelter has a written policy regarding client possession of weapons that ensures the safety of clients, staff and volunteers. The policy should address the concealed carry law. Clients are informed of the policy.
19. The Shelter has written rules regarding leaving and returning to shelter.
20. The shelter can demonstrate that clients are given the opportunity to appeal discharge decisions. This can be information that is included on appeal forms or information that is provided as part of the intake packet to clients.
21. The shelter shall identify actions that could result in immediate discharge such as a client posing a danger to self, other residents, staff and volunteers and/or shelter property. Clients are informed of the policy.

22. Shelter staff maintains up-to-date case notes to record client or service provider contacts and client progress. Case notes are concise, factual, relevant and legible. Case notes must be recorded and placed into clients files. Case notes document at least weekly face to face contacts.

23. The shelter maintains a current case record for each client household. Clients receiving individualized assistance have case records that, in addition to basic case record documentation, include the following:

- Client assessment - SPDAT completed upon entry and exit
- Housing plan - that focuses on resolving the barriers most likely to prevent the client from successfully exiting the shelter.
- Signed consent forms for the release and exchange of information with service/housing providers identified in the case plan
- Routine case notes and documentation of ongoing services
- Documentation of routine supervisory review
- Final disposition or summary

24. The shelter collects and enters data into CMIS that is relevant to the delivery of homeless services.

25. The shelter Staff inform clients of the purpose for data collection and explain client rights concerning the collection and use of their private information.

### **HOTEL/MOTEL/OTHER BEDS FOR SHELTER PURPOSES**

**Note : These beds are not part of a supervised facility so above staffing requirements do not apply.**

Hotel/motel/Other Shelter is meant to be for a short period of time. The guiding principle of emergency shelter services is to secure a safe alternative placement, as rapidly as possible, and necessary supports for all clients to achieve stable, permanent housing. A “progressive engagement” strategy that starts with a small amount of assistance to help resolve homelessness and then adds more assistance, when necessary, if the less intensive intervention is unsuccessful. Clients are informed of the standards noted below that apply to hotel/motel/other shelter beds:

- a. Staff will do their best to accommodate their interim housing needs.
- b. Agency will ensure there shall be sufficient beds so opposite sex children are not sharing beds.
- c. Agency shall ensure the hotel/motel/shelter bed has clean sheets, adequate clean blankets, clean pillows and pillowcases, clean towels, soap and toilet paper.
- d. Client must agree to be placed in one of the hotels that accept the Agency's commitment for payment.
- e. Client must agree that only the individual/family members on your initial application will be allowed to stay in the shelter bed.
- f. Client is responsible for any damage or loss of hotel/motel/other shelter property.
- g. Client understands that incidences of domestic violence will result in termination from hotel/motel/other shelter services.
- h. Client agrees to meet at least weekly with their Case Manager as well as maintain phone contact as client progresses towards obtaining permanent housing.

- i. Client agrees to develop a Housing Plan that outlines goals and action steps that support obtaining affordable housing which can be sustained.
- j. Client agrees to supervise children 24/ 7 to ensure their safety.
- k. Client agrees to check out in time or be responsible for payment for the last day of hotel/motel/other shelter stay.
- l. Client agrees no guests are allowed.
- m. Clients placed in Hotel/ Motel/Other Shelter beds will be immediately terminated for any unlawful activity or intentional destruction of property.

### **TRANSITIONAL HOUSING**

Transitional Housing means “a program that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months.”

Transitional Housing Standards are the same as well as the following:

1. TH Program shall define a maximum client stay.
2. TH Program shall define a rent structure with no more than 30% of adjusted gross income.
3. TH Program signs occupancy agreements or subleases with all clients residing in housing.
4. TH Program Participants must meet the HUD definition of homelessness.
5. TH program must assist clients in transitioning to permanent housing.
6. TH program must provide support services throughout the duration of stay.
7. TH program will document at least weekly face to face contacts for the first four to six weeks followed by contacts at a minimum of every other week based on client needs.
8. TH program will complete the SPDAT at move in and then 30 days, 90 days, 180 days, 270 days and 365 days.

**Revisions adopted by Homeless & Housing Alliance Membership - September 24, 2015**  
**Ratified by Homeless & Housing Alliance Executive Committee -April 20, 2015**  
**Adopted by Homeless & Housing Alliance Membership - April 23, 2015**

## APPENDIX

### 24 CFR 576.403 - Shelter and housing standards.

**(a)Lead-based paint remediation and disclosure.** The Lead-Based Paint Poisoning Prevention Act ([42 U.S.C. 4821-4846](#)), the Residential Lead-Based Paint Hazard Reduction Act of 1992 ([42 U.S.C. 4851-4856](#)), and implementing regulations in 24 CFR part [35](#), subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

**(b)Minimum standards for emergency shelters.** Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

**(1)Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

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

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

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

**(5)Water supply.** The shelter's water supply must be free of contamination.

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

**(7)Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition.

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

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

**(10)Sanitary conditions.** The shelter must be maintained in a sanitary condition.

**(11)Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have

at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

**(c) *Minimum standards for permanent housing.*** The recipient or subrecipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards provided in this paragraph (c). The recipient may also establish standards that exceed or add to these minimum standards.

**(1) *Structure and materials.*** The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

**(2) *Space and security.*** Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

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

**(4) *Water supply.*** The water supply must be free from contamination.

**(5) *Sanitary facilities.*** Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

**(6) *Thermal environment.*** The housing must have any necessary heating/cooling facilities in proper operating condition.

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

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

**(9) *Sanitary conditions.*** The housing must be maintained in a sanitary condition.

**(10) *Fire safety.***

**(i)** There must be a second means of exiting the building in the event of fire or other emergency.

**(ii)** Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

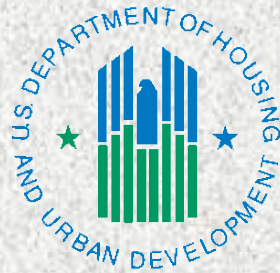
**(iii)** The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.







**Palm Beach County  
Board of County Commissioners**



**Palm Beach County  
Department of Housing and Economic Development  
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