



Palm Beach County
Board of County Commissioners



FY 2024-2025 Action Plan



**PALM BEACH COUNTY
FY 2024-2025 ACTION PLAN**

**Palm Beach County
Board of County Commissioners**

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**PALM BEACH COUNTY FY 2024-2025 ACTION PLAN
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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 2024-2025, HUD published the following formula grant awards for Palm Beach County: Community Development Block Grant (CDBG) - \$6,487,957; HOME investment Partnership (HOME) - \$2,201,524; and Emergency Solutions Grant (ESG) - \$568,768. 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 (HED) is the lead agency responsible for the consolidated planning process. The development of the Action Plan involves HED 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 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 2024–2025 Action Plan are identified on the chart below.

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Goal Name	Objective	Needs Addressed	Goal Outcome Indicator
Affordable Rental Housing	Affordable Housing	Affordable Rental Housing	Rental Units Constructed: 657 units
Affordable Homeownership	Decent, Affordable Housing	Homeownership	Homeowner Housing Constructed: 106 units Homeowner Rehabilitation: 50 units Direct Financial Assistance to Homebuyers: 44 units Foreclosure Assistance: 30 units
Public Services	Suitable Living Environment	Provision of Public Services	Public Service activities other than Low/Moderate Income Housing Benefits: 726 persons assisted
Special Needs Services	Suitable Living Environment	Provision of Public Services	Public Service activities other than Low/Moderate Income Housing Benefits: 51 persons assisted
Homelessness	Decent, Affordable Housing	Homeless Assistance	Public Service activities other than Low/Moderate Income Housing Benefits: 743 persons assisted Tenant-based rental assistance/Rapid Re-housing: 162 persons assisted
Public Facilities and Infrastructure	Suitable Living Environment	Public Facilities and Infrastructure	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 96,400 persons
Code Enforcement	Suitable Living Environment	Code Enforcement	Other: 23,676 persons
Economic Development	Economic Opportunities	Economic Development	Jobs Created/retained: 79 jobs Businesses Assisted: 1,352 businesses

3. Evaluation of past performance

The current fiscal year began on October 1, 2023, and therefore Palm Beach County had only completed nine months when the draft FY 2024-2025 Action Plan was completed. Accomplishments for FY 2023-2024 will be reported in the Comprehensive Annual Performance and Evaluation Report to be published in December 2024. 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 2022-2023		Percent Realized
			Target	Actual	
Housing	Homeowner Housing Added	Households	14	101	714.28%
	Homeowner Housing Rehabilitated	Households	60	11	18.33%
	Direct Financial Assistance	Households	60	37	61.66%
	Mortgage Assistance	Households	27	61	225.92%
	Rental Units Constructed	Units	589	374	63.49%
	Rental Assistance	Households	112	820	732.14%
	Total Housing	Households	862	1,404	162.76%
Economic Development	Economic Development Services	FTE Jobs	150	113	75.33%
	Economic Development	FTE Jobs	23	29	126.08%
	Total Economic Development (Jobs)	FTE Jobs	173	142	82.08%
	Economic Development Services	Businesses	1,000	876	87.6%
	Economic Development	Businesses	102	137	134.31%
	Total Economic Development (Businesses)	Businesses	1,102	1,013	91.92%
Capital Improvements	Infrastructure	Persons	20,480	20,480	100.00%
	Public Facilities	Persons	39,375	39,375	100.00%
	Total Capital Improvements	Persons	59,855	59,855	100.00%
Homeless	Prevention	Persons	0	0	0.00
	Services	Persons	1,367	2,291	167.59%
	Tenant-based rental assistance	Persons	112	820	732.14%
	Total Homeless		1,479	3,111	210.34%
Special Needs	Housing	Households	0	0	0.00
	Services	Persons	171	214	125.14%
Public Services	General	Persons	664	861	129.66%

4. Summary of citizen participation process and consultation process

A total of four (4) public meetings were held by Palm Beach County as part of its Action Plan public participation process. On March 13, 2024, 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 16, 2024, 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 June 12, 2024, an in-person/virtual meeting will be 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 hedcomments1@pbc.gov until the date of the BCC meeting.

On July 2, 2024, the Action Plan will be 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.pbc.gov/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:

March 13, 2024 – In-Person and Virtual Public Meeting

No public comments were received at this meeting.

April 16, 2024 – Palm Beach County Board of County Commissioners Workshop

Affordable rental units remain a great concern for the residents of Palm Beach County, as the housing crisis continues to pose a threat to their sense of security.

Board Direction:

After the 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.

June 12, 2024 – In-Person and Virtual Public Meeting

Public comments will be included after the meeting.

July 2, 2024 – BCC Public Meeting

Public comments will be included after the meeting.

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 2024-2025 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.

Agency Role	Name	Department/Agency
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 2024-2025 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

Jonathan B. Brown, Director, Department of Housing and Economic Development, 100 Australian Avenue, Suite 500, West Palm Beach, FL 33406

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

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 2024-2025 Action Plan consultation included a combination of virtual and in person meetings with county partners, including non-profits, sub-recipients 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 2024-25 Action Plan. The Action Plan was approved by the BCC at a Public Hearing on July 2, 2024.

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

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 BCC 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. HED 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.

HED 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 certification from the County ensuring their annual plans and strategies are consistent with the goals of the County's Consolidated Plan.

HED 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 HED.

PBC 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. HED provides funding to three (3) agencies that provide services to the homeless, victims of domestic abuse and youth aging out of foster care populations.

Palm Beach County has inter-local agreements with 31 municipalities through the Urban County Qualification Program. Of these, 9 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 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's mission is to plan for and manage homeless assistance resources and programs effectively and efficiently in order to assist the homeless population end homeless 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 has work 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 CoC annual grant. Typically, this grant totals approximately \$9.4 million and is awarded to 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 Community Services Department (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 the CSC administers the EFS Program.

Palm Beach County Sheriff's Office in coordination with the County's Homeless Resource Centers 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 and the County's Criminal Justice Commission. 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 continues 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 (3) 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 currently rehabilitating the Senator Philip D. Lewis Homeless Resource Center. The rehabilitation will result in a medical respite facility that will provide six (6) beds for medical care for persons experiencing homelessness who are too ill or frail to recover independently from an illness or injury, but not ill enough to be admitted to a hospital.

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 Governance Board prioritizes the eligible ESG components and provides direction as to how the ESG award should be allocated for each upcoming program year. The Board's recommended priorities and distribution method are brought before the entire HHA for final approval.

For FY 2024-2025, the priorities remained consistent with last fiscal year's priorities. Since the priorities remained unchanged, the HHA Governance Board opted to recommend ESG funding to the current FY 23 ESG sub-recipients provided that the agencies and activities were deemed to be in good standing. To that end, county staff reviewed each ESG sub-recipient and ESG-funded activity to ensure:

- a HHA ESG priority was met;
- all ESG and county regulatory requirements were met;
- contractually goals and expenditures rates were met;

- participation in HMIS; and
- latest monitoring report for the ESG activity noted no findings or concerns.

All ESG sub-recipients and ESG-funded activities were found to be in good standing. The proposed ESG funding recommendations were brought before the full HHA Committee for ratification and then the recommendations were forwarded to the Board of County commissioners (BCC) for final approval.

Palm Beach County's HMIS is funded by the County, various grants, and by user licensing fees. The HHA has a HMIS Subcommittee that acts as an advisory group to the HHA Governance Board. 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 assigned to this subcommittee. The HMIS Policies and Procedures and the HMIS User Agreements are updated annually by the HMIS Subcommittee and approved by the HHA Governance Board.

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

See Table on Following Page

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)

See Table on Following Page

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 virtual 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 meeting, made announcement, solicited input/comment
Homeless and Housing Alliance (CoC)	Services - Homelessness	Homeless Needs / Homelessness Strategy	Attended 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 meetings, delivered presentation, provided written materials, solicited input/comments

Brief Description of How Input is Solicited

HED 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 March 13, 2024. A Board of County Commissioners (BCC) workshop was held on April 16, 2024 to obtain BCC direction in regards to the development of the Action Plan. Public comments were solicited at all presentations and public meetings. Notices for the public meetings as well as the BCC meeting were published in the local newspaper, placed on HED's website and emailed to interested agencies, municipalities, and other County Departments.

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 Following 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 the Consolidated Plan
21st Century Palm Beach County	Palm Beach County Office of Economic Development	Guides overall economic goals and strategy for county government
Housing For All	Housing Leadership Council of Palm Beach County	Outlines ways to address housing issues in Palm Beach County
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.

Table 1 – Other local / regional / federal planning efforts

Outline consultations in regard to broadband and resilience

Palm Beach County works and consults with local municipalities, such as the City of Riviera Beach, to increase the number of Wi-Fi “hotspots” in low and moderate income neighborhoods which will allow more residents access to the internet. Additionally, the County’s Information Systems Services department has consulted and worked with the School District of Palm Beach County to

connect school facilities to the County's fiber-optic run in order to enable more students the ability to obtain wireless internet services. During FY 2024-2025, Palm Beach County will continue to consult and work with local agencies to assist low and moderate income residents obtain access to internet services.

In regard to resilience specific activities, Palm Beach County, through its Division of Emergency Management and its Office of Resilience meet and work with local agencies and municipalities to identify strategies to mitigate and adopt to environmental hazards and disaster risks, including floods, drought, severe storms, tropical cyclones, coastal erosion and wildfires. Additionally, the County consults and works with the South Florida Management District (SFWMD) and the Lake Worth Drainage District (LWDD) in connection with the maintenance of drainage canals managed by the SFWMD and the LWDD throughout the County to insure that potential areas of flooding are addressed prior to potential storm events

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(I))

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 HED 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.

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 to include necessary amendments, and performance reports. Citizen participation is solicited through public meetings, newspaper advertisements, website postings, and direct notifications. Palm Beach County encourages the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities. The County will make available bilingual translators for non-English speaking residents for the purposes of public meetings. All printed documentation includes a statement informing the public that documents can be made available in an alternate format, if necessary. Furthermore, Palm Beach County complies with the Americans with Disabilities Act requirements as it relates to public meetings and related activities. Each public notice contains information stating that the County will make accommodations for persons with disabilities, providing a three (3) day notice.

The first meeting was held in-person and virtually on March 13, 2024 to discuss the CDBG, ESG, and HOME Programs. This meeting was held to encourage 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 25, 2024, posting the notice on the DHED website, and sending an e-mail to municipalities and interested agencies. A notice was advertised in the Palm Beach Post on March 31, 2024 informing the public about a workshop to be held on April 16, 2024 before the Palm Beach County Board of County Commissioners (BCC). The workshop presented funding strategies on the CDBG, ESG and HOME Programs. The BCC provided direction on those strategies. The Draft Action Plan was made available to the public for review by way of a public notice published in the Palm Beach Post on June 2, 2024, 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 held on June 12, 2024. This meeting presented the specific funding recommendations for the FY 2024-2025 Action Plan before the final plan went before the BCC on July 2, 2024 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:

- 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 March 13, 2024, DHED held a virtual and in-person meeting. The attendees included representatives of non-profit agencies, municipalities, county departments, and other interested parties to receive input on the proposed Action Plan.	The pandemic has increased the demand for domestic violence services. The population of homeless persons has increased.	All comments were accepted at the public meeting.	www.pbc.gov/hed
Public Meeting	Non-targeted/ broad community	On April 16, 2024, DHED sought board direction on funding strategies for the annual Action Plan as outlined by DHED at the BCC workshop.	Efforts should remain on providing affordable housing units, addressing homelessness, and substance abuse concerns.	All comments were accepted at the BCC workshop.	www.pbc.gov/hed
Public Meeting	Non-targeted/ broad community	On June 12, 2024, DHED held a virtual and in-person meeting. The attendees included non-profit agencies, municipalities, county departments, and other interested parties to receive input on the proposed Action Plan.	Comments will be entered after meeting	Comments will be entered after meeting	www.pbc.gov/hed
Public Meeting	Non-targeted/ broad community	On July 2, 2024, DHED presented the Action Plan to the Board of County Commissioners for approval.	Comments will be entered after meeting	Comments will be entered after meeting	www.pbc.gov/hed

Expected Resources

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

Introduction

Entitlement grant resources totaling \$29,127,052 are expected to be available during Fiscal Year 2024-2025 (October 1, 2024 – September 30, 2025). 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 2025.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Administration and Planning Economic Development Housing Public Improvements Public Services	\$6,487,957	\$20,000	\$4,751,814	\$11,259,771	\$2,510,240	The CDBG entitlement allocation from HUD for FY 2024-2025 is \$6,487,957. Program income was calculated at \$20,000 for a total available amount of \$6,507,957.
HOME	Public-Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance	\$2,201,524	\$350,000	\$14,746,989	\$17,298,513	\$2,621,538	The HOME entitlement allocation from HUD for FY 2024-2025 is \$2,201,524. Program income was calculated at \$350,000 for a total available amount of \$2,551,524.
ESG	Public-Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$568,768	\$0	\$0	\$568,768	\$220,434	The ESG Program entitlement allocation from HUD for FY2024-2025 is \$568,768.
TOTAL			\$9,258,249	\$370,000	\$19,498,803	\$29,127,052	\$5,352,212	

Table 2 - Expected Resources – Priority Table

Other Funding Resources (Leveraged)

Program	Source	Uses of Funds	Expected Amount (FY 2024-2025)
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.	\$20,643,166
Continuum of Care	Federal	Homeless and special needs assistance to create community systems for combating homelessness.	\$11,202,138
Public Housing Authority Funding - Capital Fund	Federal	Develop, finance, and modernize public housing developments and management improvements.	\$3,378,300
Public Housing Operating Subsidy	Federal	Provides operating subsidiaries to housing authorities to assist in funding operating and maintenance.	\$4,114,932
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.	\$37,654,256
Family Self-Sufficiency Program	Federal	Program to assist public housing residents and section 8 housing choice voucher program participants to connect to supportive services.	\$262,490
Mainstream Vouchers	Federal	Program to provide rental assistance to enable persons with disabilities (elderly and non-elderly) to rent affordable private housing.	\$4,564,840
Neighborhood Stabilization Program (Program Income)	Federal	Mortgage Program, Residential Redevelopment (acquisition and rehabilitation), and Neighborhood Redevelopment.	\$1,500,000
Ending the HIV Epidemic	Federal	Services provided to clients and subrecipients for HIV services	\$2,000,000
Ryan White Title I	Federal	Services provided by agencies who serve the HIV/AIDS community.	\$7,561,079
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.	\$1,800,000
		FEDERAL	\$94,681,201
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. (Includes \$1M program income.)	\$12,463,331
		STATE	\$12,463,331

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.	\$14,319,704
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.	\$3,211,176
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.	\$3,272,281
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.)	\$27,455,410
Palm Beach County Housing Finance Authority	Private Capital/ Tax Exempt Bonds/ Revolved Funds	Single Family 1st Mortgage Loans \$8M; Single Family DPA 2nd Mortgage Loans \$200K; MF Bond Issuance for three new construction projects \$58.5M; Expected MF Bond Issuance for two rehab projects \$68M; and Revolving Construction Loan for three projects \$2.35M.	\$ 179,500,000
Industrial Revenue Bonds	County	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.)	\$50,000,000
		LOCAL	\$277,758,571
		TOTAL	\$384,903,103

Table 2 – Other Federal, State and Local Resources

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

Palm Beach County expects to receive \$384,903,103 from Federal, State and local sources to complement the (FY2024-2025) CDBG, ESG, and HOME funds totaling \$9,258,249. Of the funds being leveraged \$94,681,201 is from Federal sources, \$12,463,331 from the State and \$277,758,571 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 \$467,939. For the ESG program, this will be provided by the ESG sub-recipients and the County in an amount no less than \$568,768

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

Palm Beach County keeps records of County-owned real 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 and its use will serve public purpose. 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 and County staff has proposed the use of suitable county-owned land as one strategy to address this problem. The County is in the process of developing a small subdivision on an approximate 4 acre parcel in central Palm Beach County, as well as approximately 22 single family lots scattered countywide. The County is planning to issue a request for proposal (RFP) to convey or lease surplus property (approximately 6.34 acre) for the development of affordable workforce housing.

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).

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal	Category	Geographic Area	Needs Addressed	Funding
Affordable Rental Housing	Affordable Housing	Countywide	Affordable Rental Housing	SHIP - \$1,000,000 PBCHFA - \$170,000,000
	Start Year: 2024	End Year: 2025	Outcome: Affordability	Objective: Provide decent affordable housing
	Narrative: 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Rental Units Constructed		417	Households Housing Units

Goal	Category	Geographic Area	Needs Addressed	Funding
Affordable Homeownership	Affordable Housing	Countywide	Affordable Homeownership	HOME – \$1,481,524 SHIP- \$7,109,864 PBCHFA- \$9,500,000
	Start Year: 2024	End Year: 2025	Outcome: Affordability	Objective: Provide decent affordable housing
	Narrative: 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Homeowner Housing Added		104	Household Housing Units
	Direct Financial Assistance to Homebuyers		41	Household Housing Units
	Mortgage Assistance (Other)		30	Household Housing Units
	Homeowner Housing Rehabilitated		50	Household Housing Units

Goal	Category	Geographic Area	Needs Addressed	Funding
Public Services	Non-Housing Community Development	Countywide	Provision of Public Services	CDBG - \$138,038
	Start Year: 2024	End Year: 2025	Outcome: Availability/Accessibility	Objective: Create suitable living
	Narrative: 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Public service activities other than low/moderate income housing		840	Persons Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
Special Needs Services	Non-Housing Community Development	Countywide	Provision of Public Services	CDBG - \$70,412
	Start Year: 2024	End Year: 2025	Outcome: Availability/Accessibility	Objective: Create suitable living
	Narrative: Provision of services to the mentally, physically and developmentally disabled, youth aging out of foster care, and victims of domestic abuse.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Public service activities other than low/moderate income		45	Persons Assisted

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Goal	Category	Geographic Area	Needs Addressed	Funding
Homelessness	Homeless	Countywide	Provision of Public Services, Homeless Assistance	CDBG – \$729,894 ESG - \$482,393 HOME - \$500,000
	Start Year: 2024	End Year: 2025	Outcome: Availability/Accessibility	Objective: Create suitable living environments
	Narrative: 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Public service activities other than low/moderate income housing benefit		743	Persons Assisted
	Tenant based rental assistance/Rapid Rehousing		820	Households Assisted

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Goal	Category	Geographic Area	Needs Addressed	Funding
Public Facilities and Infrastructure	Non-Housing Community Development	City of Belle Glade, City of Greenacres, Town of Lake Park, City of Lake Worth Beach, Town of Lantana, Village of Palm Springs, City of Riviera Beach, Unincorporated PBC	Public Facilities and Infrastructure	CDBG - \$2,917,696
	Start Year: 2024	End Year: 2025	Outcome: Availability/Accessibility	Objective: Create suitable living
	Narrative: 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Public facilities or infrastructure activities other than low/moderate income housing benefit		96,400	Persons Assisted

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Goal	Category	Geographic Area	Needs Addressed	Funding
Code Enforcement	Non-Housing Community Development	City of Belle Glade, City of South Bay, Town of Mangonia Park	Code Enforcement	CDBG - \$205,677
	Start Year: 2024	End Year: 2025	Outcome: Sustainability	Objective: Create suitable living
	Narrative: Support the work of code enforcement officers to identify and take actions to cure code violations in designated target areas.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Other		23,676	Persons Assisted

Goal	Category	Geographic Area	Needs Addressed	Funding
Economic Development	Economic Development	Countywide	Economic Development	CDBG - \$777,818
	Start Year: 2024	End Year: 2025	Outcome: Sustainability	Objective: Create economic opportunities
	Narrative: 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, and 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.			
	Goal Outcome Indicator:		Quantity	Unit of Measurement
	Jobs Created/Retained		79	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 1,049 eligible extremely low-income, low-income, and moderate-income families, including homeless individuals/families will be provided with affordable housing assistance during FY 2024-2025. A further discussion of this estimate is discussed under AP-55 – Affordable Housing.

Projects

AP-35 Projects – 91.220(d)

Introduction

Palm Beach County's FY 2024-2025 Action Plan identifies a total of twelve (12) project areas, within which 36 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 and rapid re-housing activities, housing-related activities, and administrative/activity delivery costs needed to undertake the activities. All activities identified in the Plan are projected to be completed within one (1) to three (3) years.

Funding allocations provided to projects and activities identified in the Action Plan are predicated on the actual funding awarded 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 Plan, and such activities are identified through amendments to the Plan.

Projects

	Project Name
1	CDBG24 Code Enforcement
2	CDBG24 Public Facilities
3	CDBG24 Public Infrastructure
4	CDBG24 Public and Special Needs Services
5	CDBG24 Economic Development
6	CDBG24 Program Administration
7	HOME24 Home Program Administration and Planning
8	HOME24 Home CHDO Set-Aside Program
9	HOME24 Home CHDO Operating Expenses
10	HOME24 Home Tenant Based Rental Assistance (TBRA)
11	HOME24 Home Homebuyer Assistance Program
12	ESG24 Emergency Solutions Grant

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

The funding priorities addressed in the FY 2024-2025 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, program income, and Ad Valorem, among others, to address identified priorities. The type of activities to be prioritized for funding is dependent on the following: the amount of available funding; directives given by the Board of County Commissioners; homeless priorities established by the Homeless and Housing Alliance and those activities eligible under the ESG Program; the amount of funding request applications submitted by County departments and municipalities for public facilities and infrastructure improvements; and how the closely the activity for which funding is requested correlates to the priority needs outlined in the Consolidated Plan.

The major obstacles faced by Palm Beach County in addressing and meeting underserved needs are the limited available resources to address priority needs identified in the Plan; a shortage of available, affordable housing units for extremely low-, low-, moderate-, and middle-income families; and disproportionately high housing costs in relation to household earnings.

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AP-38 Project Summary

Project Summary Information

Project Name		CDBG24 Code Enforcement
1.	Activity Name	City of Belle Glade
	Target Area	Belle Glade
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$155,424
	Planned Activities	Provide support for code enforcement activities within the municipal boundaries of the City of Belle Glade.
	Target Date	September 30, 2025
	Number of Beneficiaries	16,896 persons
	Location Description	110 Dr. Martin Luther King, Jr. Blvd., Belle Glade, FL 33430
2.	Activity Name	City of South Bay
	Target Area	South Bay
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$37,372
	Planned Activities	Provide support for code enforcement activities within the municipal boundaries of the City of South Bay.
	Target Date	September 30, 2025
	Number of Beneficiaries	4,830 persons
	Location Description	335 SW 2 nd Avenue, South Bay, FL 33493
3.	Activity Name	Town of Mangonia Park
	Target Area	Mangonia Park
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement

	Funding	CDBG: \$13,061
	Planned Activities	Provide support for code enforcement activities within the Mangonia Park CDBG Target Area.
	Target Date	September 30, 2025
	Number of	1,950 persons
	Location Description	1755 East Tiffany Drive, Mangonia Park, FL 33407
Total Code Enforcement: \$205,857		
Project Name		CDBG24 Public Facilities
1.	Activity Name	PBC Facilities – Belle Glade Intake and Assessment Center
	Target Area	City of Belle Glade
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$906,884
	Planned Activities	Interior renovations to homeless intake and assessment center
	Target Date	February 28, 2026
	Number of	150 persons
	Location Description	341 NW 11th Street, Belle Glade, FL 33430
2.	Activity Name	Facilities Development and Operations – Redevelopment of the Lake Worth West Community Center
	Target Area	Lake Worth Corridor
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$563,483
	Planned Activities	Demolition of existing structure and replacement with newly constructed facility
	Target Date	August 31, 2026
	Number of	9,085 persons

	Location Description	4730 Maine Street, Lake Worth, FL 33461
3.	Activity Name	PBC Parks and Recreation – Haverhill Park Basketball Lighting Project
	Target Area	Town of Haverhill
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$507,527
	Planned Activities	Installation of high efficiency LED lighting for basketball courts
	Target Date	December 31, 2025
	Number of	19,810 persons
	Location Description	5470 Haverhill Road, Haverhill, FL 33415
4.	Activity Name	Town of Lake Park – Aquatic/Community Center (Phase I and II)
	Target Area	Lake Park
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$400,916
	Planned Activities	Design and construction of a recreational aquatic facility center. Funding will consist of the Towns CDGB Allocation of \$50,266 and \$350,650 of Special Area of Hope allocation.
	Target Date	November 30, 2026
	Number of	8,315 persons
	Location Description	311 7th Street, Lake Park, FL 33403
5.	Activity Name	City of Lake Worth Beach – Youth Empowerment Learning Center Improvements
	Target Area	Lake Worth Beach

	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$301,586
	Planned Activities	Interior and exterior renovations to an existing youth learning center
	Target Date	December 31, 2025
	Number of Beneficiaries	6,445 persons
	Location Description	1699 Wingfield Street, Lake Worth Beach, FL 33460
6.	Activity Name	City of Riviera Beach – Lindsay Davis Senior Community Center Renovation
	Target Area	Riviera Beach
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	\$203,515
	Planned Activities	Renovate interior of an existing community center and add new parking area
	Target Date	November 30, 2025
	Number of Beneficiaries	6,665 persons
	Location Description	1550 West 28th Street, Riviera Beach, FL 33404
Total Public Facilities: \$2,883,911		
Project Name		CDBG24 Public Infrastructure
1.	Activity Name	City of Greenacres – Original Section Sewer Project Phase 3 North Lift Station
	Target Area	Greenacres
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$197,913

	Planned Activities	Sanitary sewer infrastructure improvements
	Target Date	October 31, 2025
	Number of Beneficiaries	1,170 households
	Location Description	Martin Avenue from 4th Street to Biscayne Drive, Greenacres, FL 33463
2.	Activity Name	Town of Lantana – 3rd Street Parking Lot Improvements
	Target Area	Lantana
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$47,329
	Planned Activities	Improvements to municipal parking area to add masonry wall, signage and lighting
	Target Date	February 28, 2025
	Number of Beneficiaries	6,415 persons
	Location Description	215 North 3rd Street, Lantana, FL 33462
3.	Activity Name	Village of Palm Springs – Lakewood Road Solar Lighting – Phase 2
	Target Area	Palm Springs
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$139,194
	Planned Activities	Installation of new solar street lighting
	Target Date	July 31, 2025
	Number of Beneficiaries	3,095 persons
	Location Description	Lakewood Road, between Kirk Road and Davis Road, Palm Springs, FL 33461
Total Public Infrastructure: \$384,436		

Project Name		CDBG24 Public and Special Needs Services
1.	Activity Name	Aid to Victims of Domestic Abuse
	Target Area	Countywide
	Goals Supported	Special Needs Services (Victims of Domestic Abuse)
	Needs Addressed	Special Needs Housing and Services
	Funding	CDBG: \$29,199
	Planned Activities	Provide transitional housing to homeless victims of domestic violence and their children.
	Target Date	September 30, 2025
	Number of Beneficiaries	26 persons
	Location Description	Confidential Location
2.	Activity Name	Healthy Mothers Healthy Babies Coalition of Palm Beach County, Inc.
	Target Area	Countywide
	Goals Supported	Public Services (Health Services)
	Needs Addressed	Public Services
	Funding	CDBG: \$16,061
	Planned Activities	Assist pregnant women and/or their immediate families to access health care and secure other services that the families may be eligible to receive.
	Target Date	September 30, 2025
	Number of Beneficiaries	200 persons
	Location Description	P.O. Box 5689, Lake Worth, FL 33466
3.	Activity Name	Legal Aid Society of Palm Beach County, Inc.
	Target Area	Countywide
	Goals Supported	Fair Housing Activities
	Needs Addressed	Public Services

	Funding	CDBG: \$46,534
	Planned Activities	Provide fair housing enforcement and educational outreach services to low and moderate income clients.
	Target Date	September 30, 2025
	Number of Beneficiaries	20 persons
	Location Description	423 Fern Street, Suite 200, West Palm Beach, FL 33401
4.	Activity Name	Palm Beach County Food Bank
	Target Area	Countywide
	Goals Supported	Public Services (Health Services)
	Needs Addressed	Public Services
	Funding	CDBG: \$19,500
	Planned Activities	Fund a Benefits Outreach Program Specialist who will provide assistance to eligible seniors in applying for SNAP benefits.
	Target Date	September 30, 2025
	Number of Beneficiaries	480 persons
	Project Location	701 Boutwell Road, Suite A-2, Lake Worth, FL 33461
5.	Activity Name	Pathways to Prosperity
	Target Area	Countywide
	Goals Supported	Public Services (Case Management)
	Needs Addressed	Public Services
	Funding	CDBG: \$28,463
	Planned Activities	Provide financial literacy training, case management services and emergency assistance to people transitioning out of poverty through the Circles Palm Beach County program.
	Target Date	September 30, 2025

	Number of Beneficiaries	75 persons
	Project Location	639 E. Ocean Avenue, Suite 101, Boynton Beach, FL 33435
6.	Activity Name	Redlands Christian Migrant Association
	Target Area	Countywide
	Goals Supported	Public Services (Child Care Services)
	Needs Addressed	Public Services
	Funding	CDBG: \$9,658
	Planned Activities	Provide comprehensive child development services to children of farmworkers.
	Target Date	September 30, 2025
	Number of Beneficiaries	60 persons
	Project Location	20 Carver Street, Belle Glade, FL 33430
7.	Activity Name	Urban League of Palm Beach County, Inc.
	Target Area	Countywide
	Goals Supported	Public Services (Housing Counseling Services)
	Needs Addressed	Public Services
	Funding	CDBG: \$17,822
	Planned Activities	Through the Comprehensive Housing Counseling Program, provide services to clients on foreclosures, homelessness prevention, fair housing, first time homebuyer education and pre-purchase counseling.
	Target Date	September 30, 2025
	Number of Beneficiaries	100 households
	Project Location	1700 N. Australian Avenue, West Palm Beach, FL 33407
8.	Activity Name	Vita Nova, Inc.
	Target Area	Countywide

	Goals Supported	Special Needs Services (Youths aging out of foster care)
	Needs Addressed	Special Needs Housing and Services
	Funding	CDBG: \$41,213
	Planned Activities	Provide transitional housing and case management services to youth, aged 18 to 25 years of age, who have aged out of the foster care system.
	Target Date	September 30, 2025
	Number of Beneficiaries	19 persons
	Project Location	1316 Alpha Street, West Palm Beach, FL 33401
9.	Activity Name	County Homeless Services
	Target Area	Countywide
	Goals Supported	Homeless Services
	Needs Addressed	Homeless Assistance
	Funding	CDBG: \$729,894
	Planned Activities	Operational costs of County-owned housing assistance centers. Services provided to help homeless individuals and families.
	Target Date	September 30, 2025
	Number of	743 persons
	Project Location	PBC Community Services – 810 Datura Street, West Palm Beach, FL 33401
Total Public Services: \$938,344		
Project Name		CDBG24 Economic Development
1.	Activity Name	Center for Technology, Enterprise and Development (TED Center)
	Target Area	Countywide
	Goals Supported	Economic Development Technical Assistance
	Needs Addressed	Economic Development
	Funding	CDBG: \$250,000
	Planned Activities	A business incubator that will provide technical assistance and services to micro-enterprises and established small businesses.

	Target Date	September 30, 2025
	Number of Beneficiaries	17 jobs/62 businesses
	Project Location	401 W. Atlantic Avenue, Delray Beach, FL 33444
2.	Activity Name	Center for Enterprise Opportunity
	Target Area	Countywide
	Goals Supported	Economic Development Technical Assistance
	Needs Addressed	Economic Development
	Funding	CDBG: \$80,000
	Planned Activities	Provides counseling services and business training to micro-enterprises and small businesses.
	Target Date	September 30, 2025
	Number of Beneficiaries	5.5 jobs/40 businesses
	Project Location	2200 N. Florida Mango Road, West Palm Beach, FL 33409
3.	Activity Name	Palm Beach County Black Business Investment Corporation
	Target Area	Countywide
	Goals Supported	Economic Development Technical Assistance
	Needs Addressed	Economic Development
	Funding	CDBG: \$96,000
	Planned Activities	Provides counseling services, business training, and access to funding to micro-enterprises and small businesses.
	Target Date	September 30, 2025
	Number of	15 jobs/150 businesses
	Project Location	380 Columbia Drive, Suite 100, West Palm Beach, FL 33409
4.	Activity Name	DHED Economic Development Services
	Target Area	Countywide
	Goals Supported	Economic Development Services

	Needs Addressed	Economic Development
	Funding	CDBG: \$351,818
	Planned Activities	Provide economic development services to businesses in Palm Beach County to help them create or retain full time equivalent jobs.
	Target Date	September 30, 2025
	Number of Beneficiaries	60 jobs/1,100 businesses
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
Total Economic Development: \$777,818		
Project Name		CDBG24 DHED Program Administration
1.	Activity Name	Program Administration
	Funding	CDBG: \$1,297,591
	Planned Activities	General, fiscal and planning administrative expenses incurred by DHED in performing planning, coordinating, and monitoring of CDBG Programs.
	Target Date	December 31, 2025
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
Total Program Administration: \$1,297,591		
Total CDBG Program: \$6,487,957		
Project Name		HOME24 HOME Investment Partnership Program
1.	Activity Name	HOME Program Administration and Planning
	Funding	HOME: \$220,000
	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, 2025
	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: \$330,229
	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, 2025
	Number of beneficiaries	2 units
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL #3406
3.	Activity Name	HOME CHDO Operating Expenses
	Funding	HOME: \$109,771
	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, 2025
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
4.	Activity Name	HOME Tenant Based Rental Assistance (TBRA)
	Target Area	Countywide
	Goals Supported	Homeless Prevention
	Needs Addressed	Homeless Prevention
	Funding	HOME: \$500,000
	Planned Activities	Funding will be allocated for homeless prevention/intervention and will be administered by PBC Department of Community Services, Division of Human and Veteran Services
	Target Date	September 30, 2025
	Number of Beneficiaries	50 households
	Project Location	810 Datura Street, West Palm Beach, FL 33401

5.	Activity Name	HOME Homebuyer Assistance Program
	Target Area	Countywide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Homeownership
	Funding	HOME: \$1,041,524
	Planned Activities	Funding will be provided in the form of second mortgages to very-low, low- and moderate-income first-time homebuyers.
	Target Date	September 30, 2025
	Number of Beneficiaries	11 households
	Project Location	100 Australian Avenue, Suite 500, West Palm Beach, FL 33406
Total HOME Program: \$2,201,524		
Project Name		ESG24 Emergency Solutions Grant
1.	Activity Name	ESG Program Administration
	Target Area	Countywide
	Needs Addressed	Planning/Administration
	Funding	ESG: \$11,375
	Planned Activities	2% of the ESG Program is set-aside for eligible planning and administration.
	Target Date	September 30, 2025
	Project Location	810 Datura Street, West Palm Beach, FL 33401 and 100 Australian Avenue, West Palm Beach, FL 33406
2.	Activity Name	ESG Emergency Shelter
	Target Area	Countywide
	Goals Supported	Homeless Services
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$289,436
	Planned Activities	Costs for agencies to operate emergency shelters in Palm Beach County.
	Target Date	September 30, 2025

	Number of Beneficiaries	378 persons
	Project Location	810 Datura Street, West Palm Beach, FL 33401
3.	Activity Name	ESG Rapid Re-Housing
	Target Area	Countywide
	Goals Supported	Homeless Prevention
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$192,957
	Planned Activities	Provide rapid re-housing to homeless families in support of homeless intervention activities. Activity will be implemented by Adopt-A-Family
	Target Date	September 30, 2025
	Number of Beneficiaries	70 persons
	Project Location	1712 2nd Avenue N, Lake Worth Beach, FL 33460
4.	Activity Name	Homeless Management Information system
	Target Area	Countywide
	Goals Supported	Homeless Services
	Needs Addressed	Homeless Assistance
	Funding	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, 2025
	Project Location	810 Datura Street, West Palm Beach, FL 33401
Total ESG Program: \$568,768		

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 2024-2025, Palm Beach County plans to utilize 45% of its CDBG allocation in 10 of the 19 CDBG Target Areas identified in the FY 2020-2024 Consolidated Plan. 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	66
City of Greenacres	73	48
Town of Lake Park	68	54
City of Lake Worth Beach	79	25
Town of Lantana	55	40
Town of Mangonia Park	82	84
Village of Palm Springs	71	58
City of Riviera Beach	69	76
City of South Bay	71	74

* Source: 2011-2015 American Community Survey

** Source: 2018-2022 American Community Survey

Geographic Distribution

Target Area	Percentage of Funds
City of Belle Glade	16%
City of Greenacres	3%
Town of Lake Park	6%
City of Lake Worth Beach	4%
Town of Lantana	1%
Town of Mangonia Park	1%
Village of Palm Springs	2%
City of Riviera Beach	3%
City of South Bay	1%
Lake Worth Corridor	8%
TOTAL	45%

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 currently 19 identified CDBG Target Areas, nine (9) 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 two Glades area municipalities (Belle Glade 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

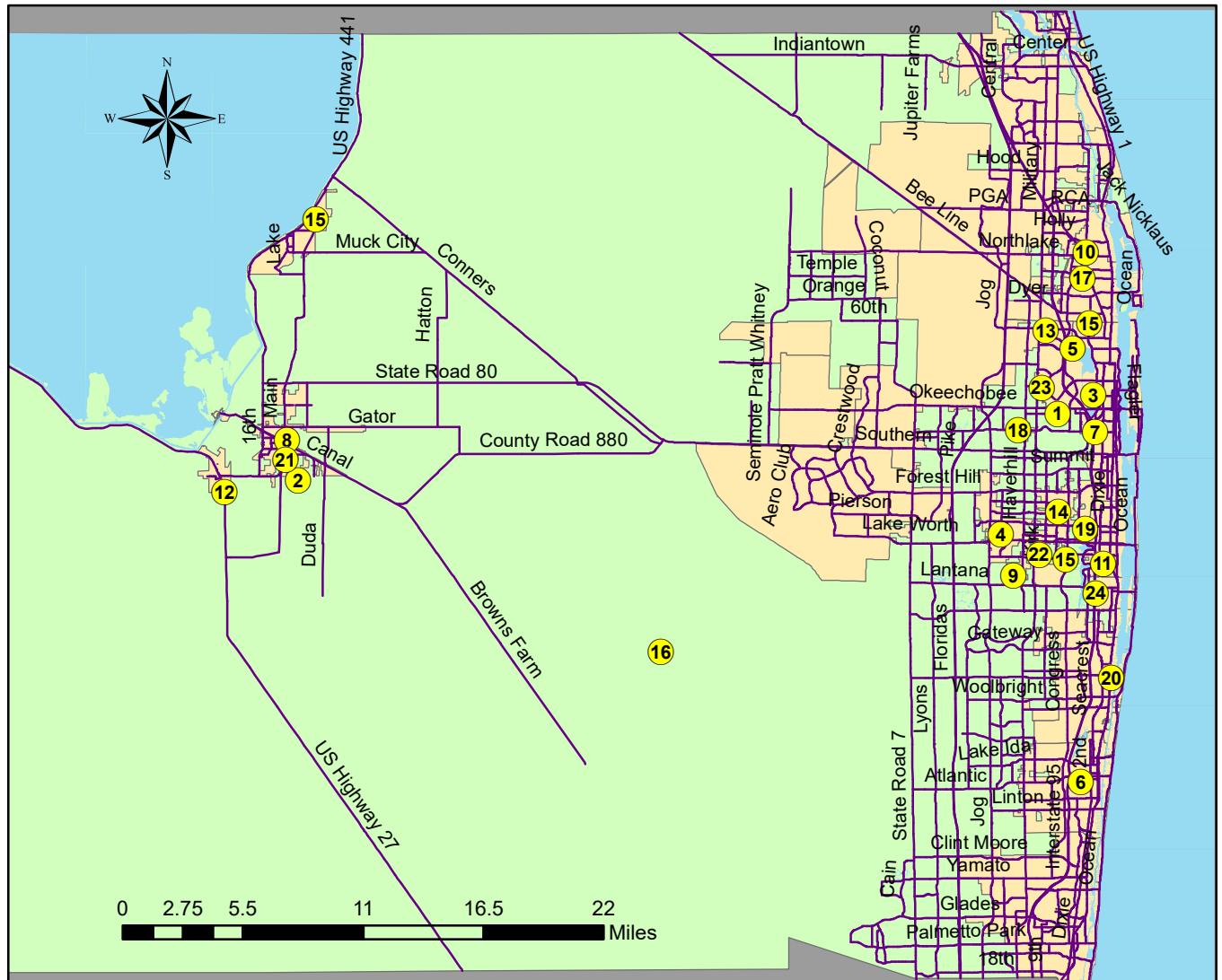
projects. Funding awards to assist projects in unincorporated Palm Beach County are also directed to CDBG target areas, unless a particular activity is identified by County Administration.

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 2024-2025 GEOGRAPHIC DISTRIBUTION OF CDBG ACTIVITIES



FY 2024-2025 CDBG Activities

1. Vita Nova
2. Redlands Christian Migrant Assoc.
3. Legal Aid Society
4. Healthy Mothers/Healthy Babies
5. Urban League of PBC
6. Center for Technology, Education and Development
7. Center for Enterprise Opportunities
8. City of Belle Glade - Code Enforcement*
9. City of Greenacres - Sanitary Sewer Installation*
10. Town of Lake Park - Aquatic/Community Center*
11. City of Lake Worth - Youth Empowerment Learning Center*
12. City of South Bay - Code Enforcement*
13. Town of Mangonia Park - Code Enforcement*
14. Village of Palm Springs - Lakewood Road Street Lighting*
15. Countywide Housing Resource Centers
16. Aid to Victims of Domestic Abuse (Confidential Location)
17. City of Riviera Beach - Lndsay Davis Sr. Community Ctr*
18. PBC Parks - Haverhill Park Lighting
19. Palm Beach County Food Bank
20. Pathways to Prosperity
21. PBC FD&O - Belle Glade Intake & Assessment Center Improv.
22. PBC FD&O - Lake Worth West Community Center Development*
23. Black Business Investment Corporation
24. Town of Lantana - 3rd Street Parking Lot Improvements*

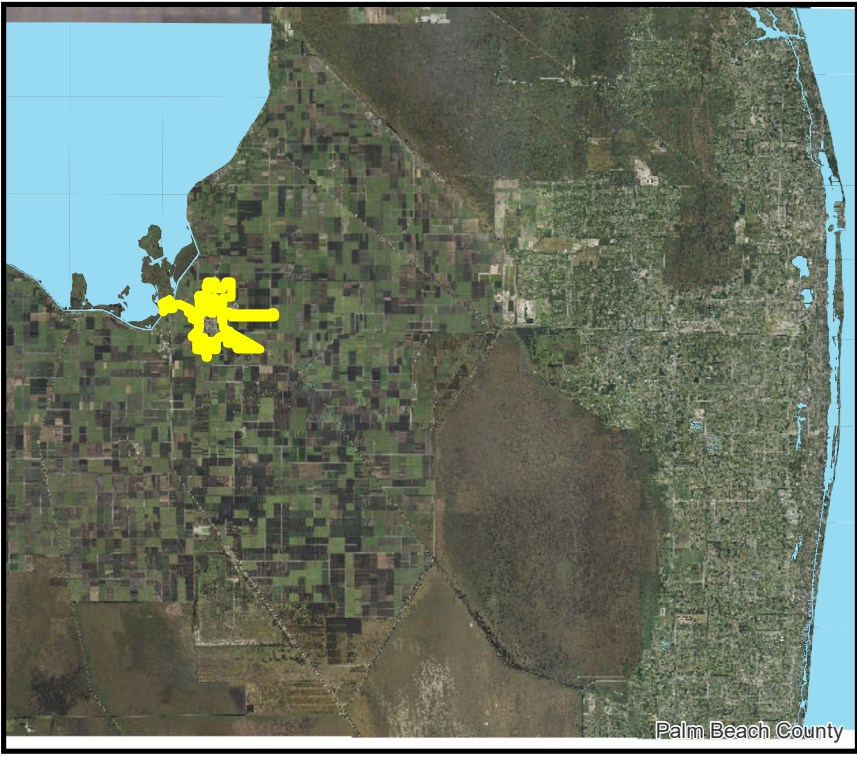
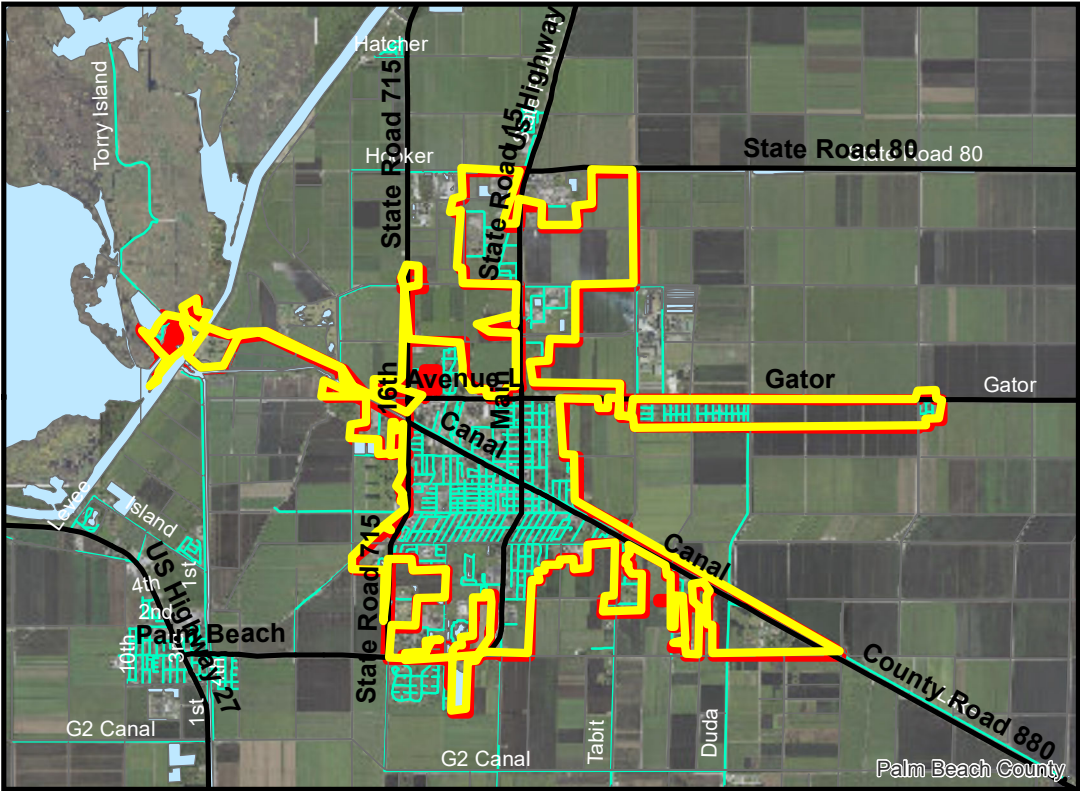
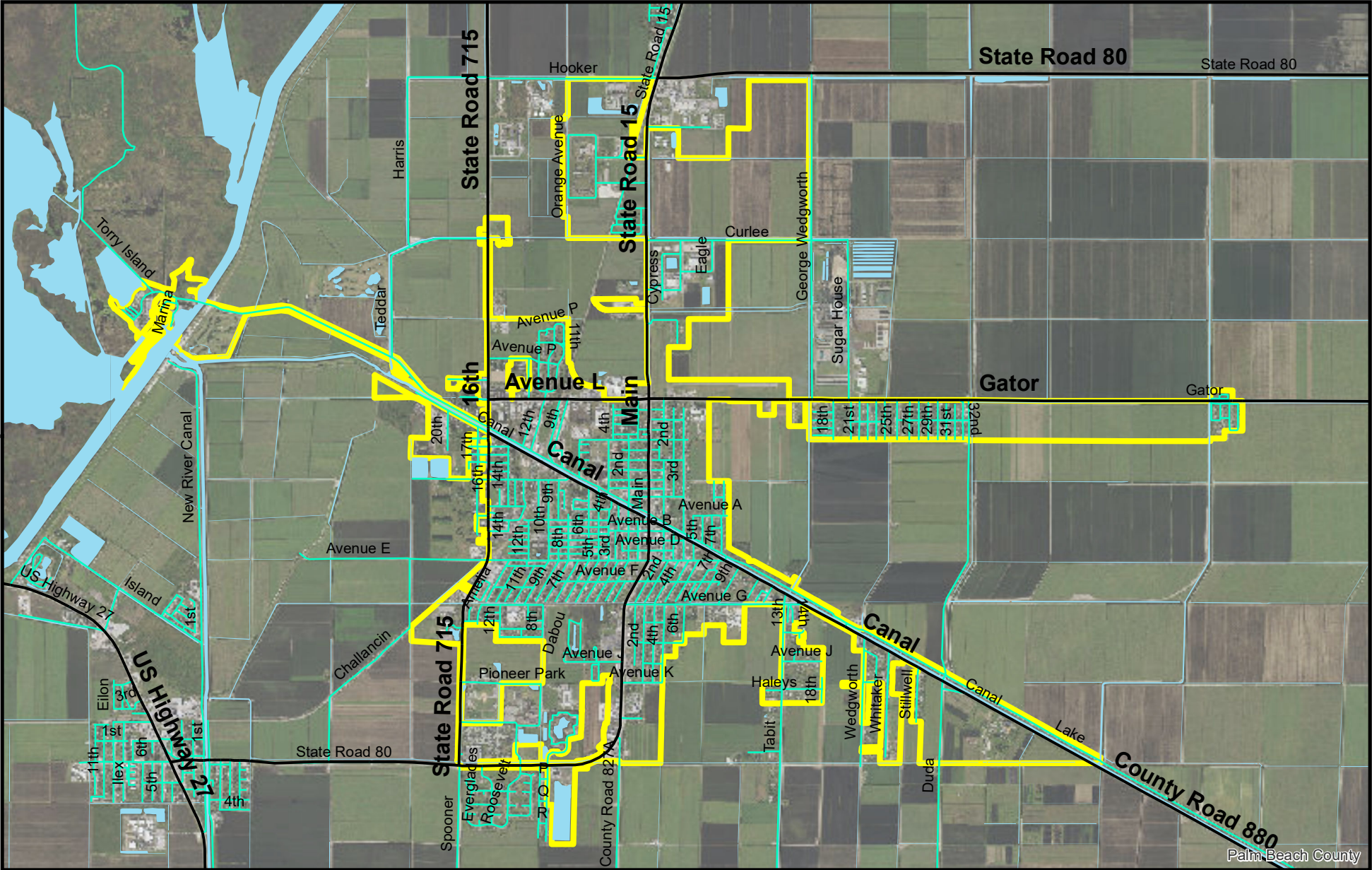
Legend

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



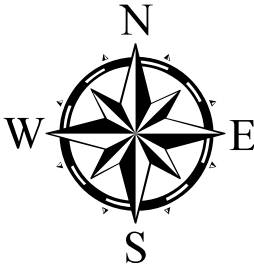


Palm Beach County
Community Development Block Grant Program
City of Belle Glade - CDBG Target Area



Legend

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

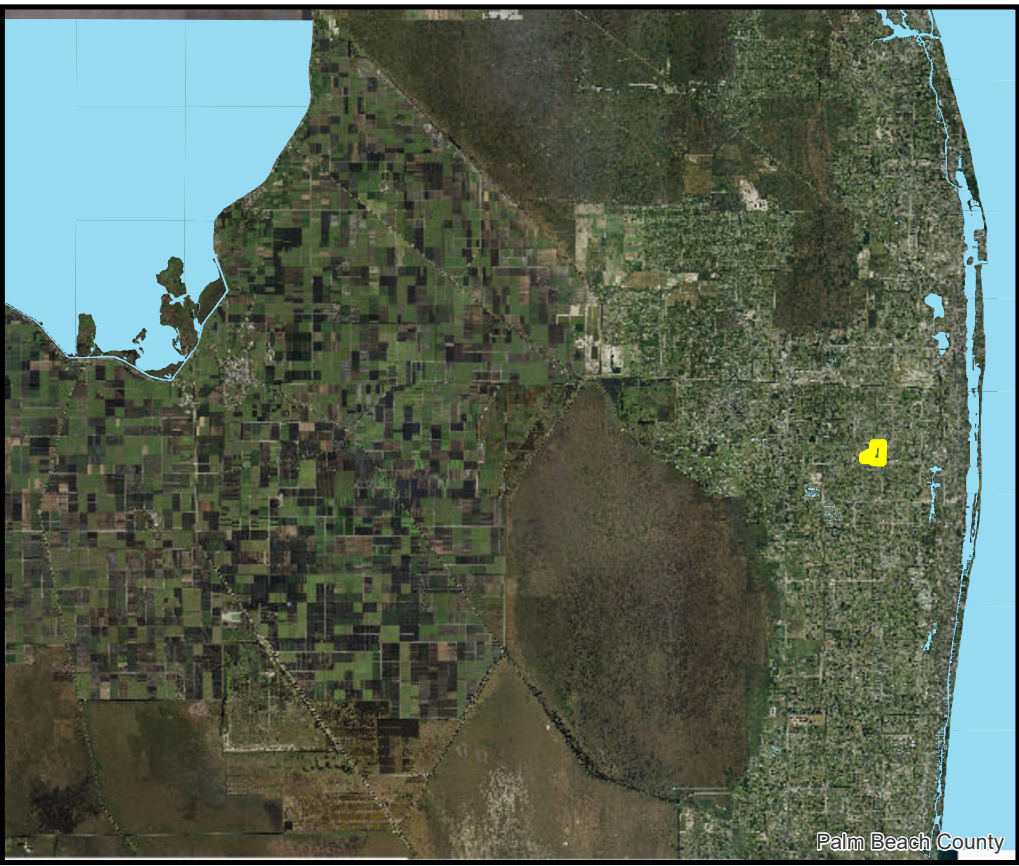
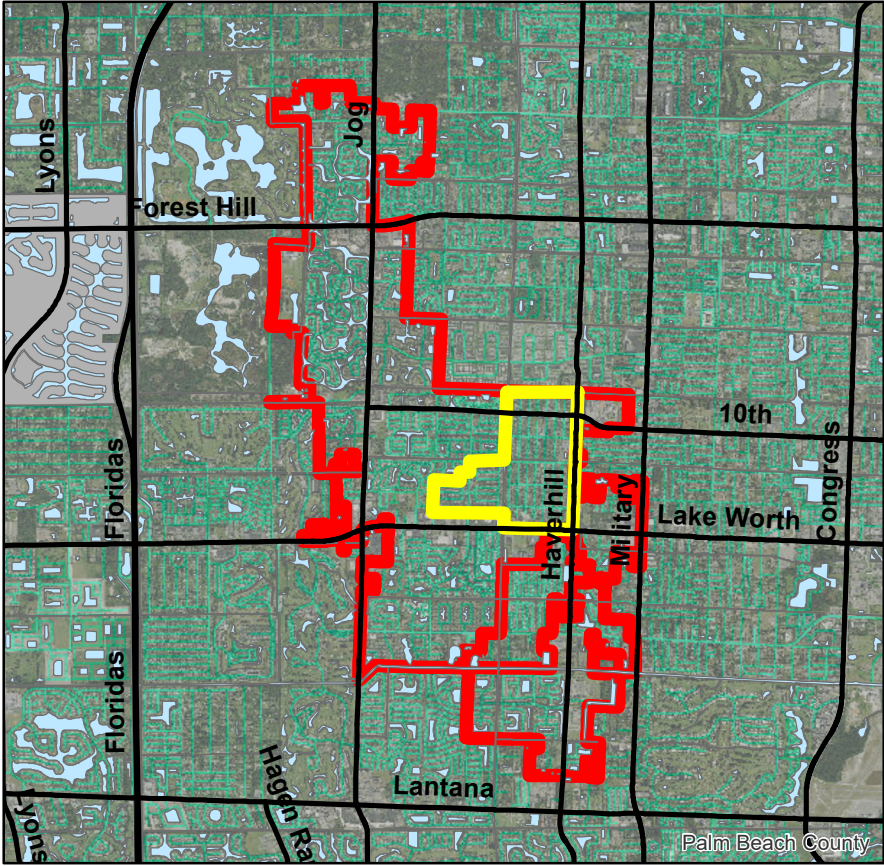
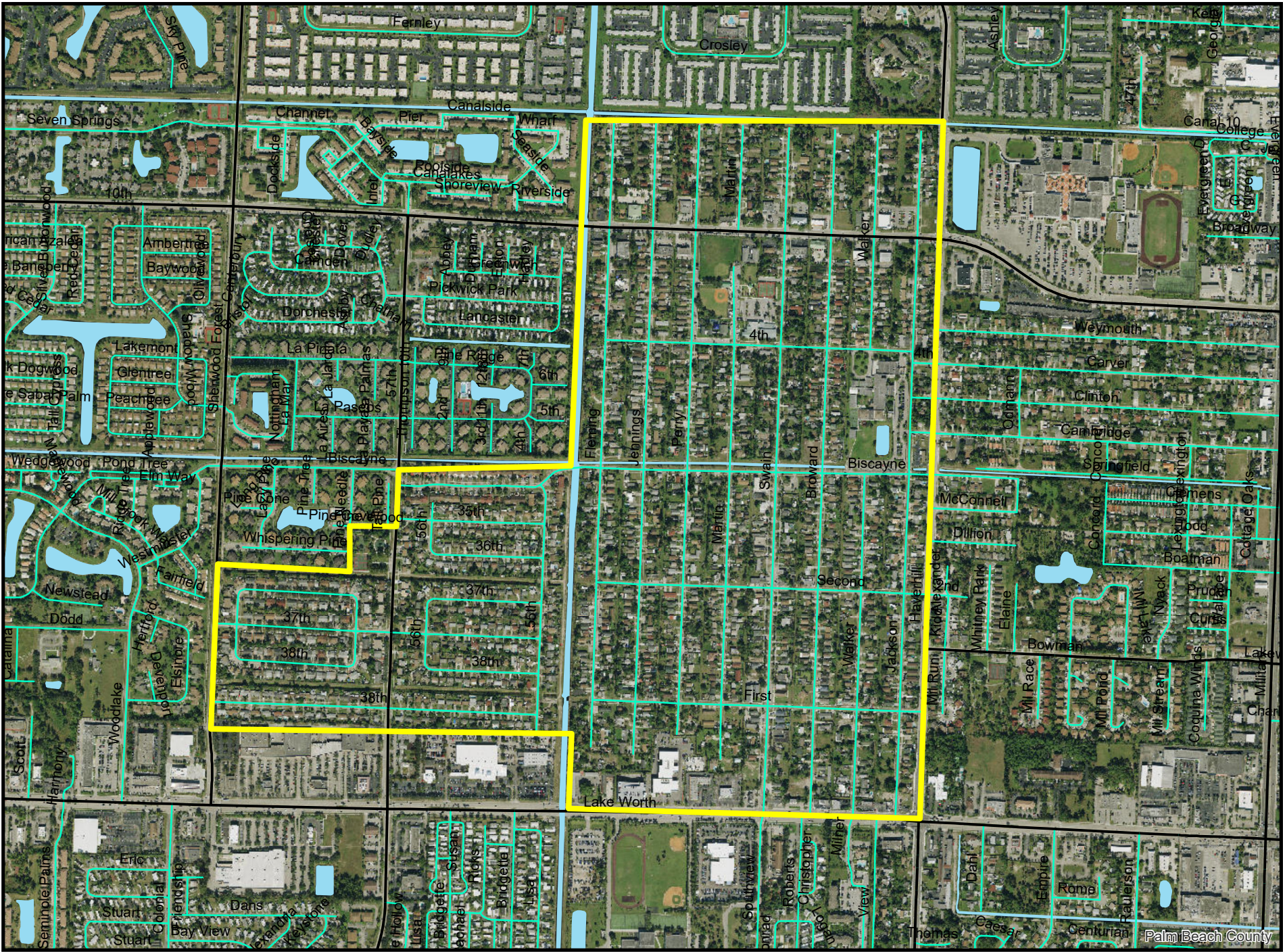


Source: 2011-2015 American Community Survey (Low/Mod Income)

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

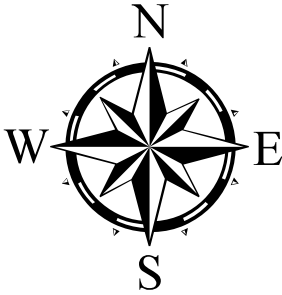


Palm Beach County
Community Development Block Grant Program
City of Greenacres - CDBG Target Area



Legend

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

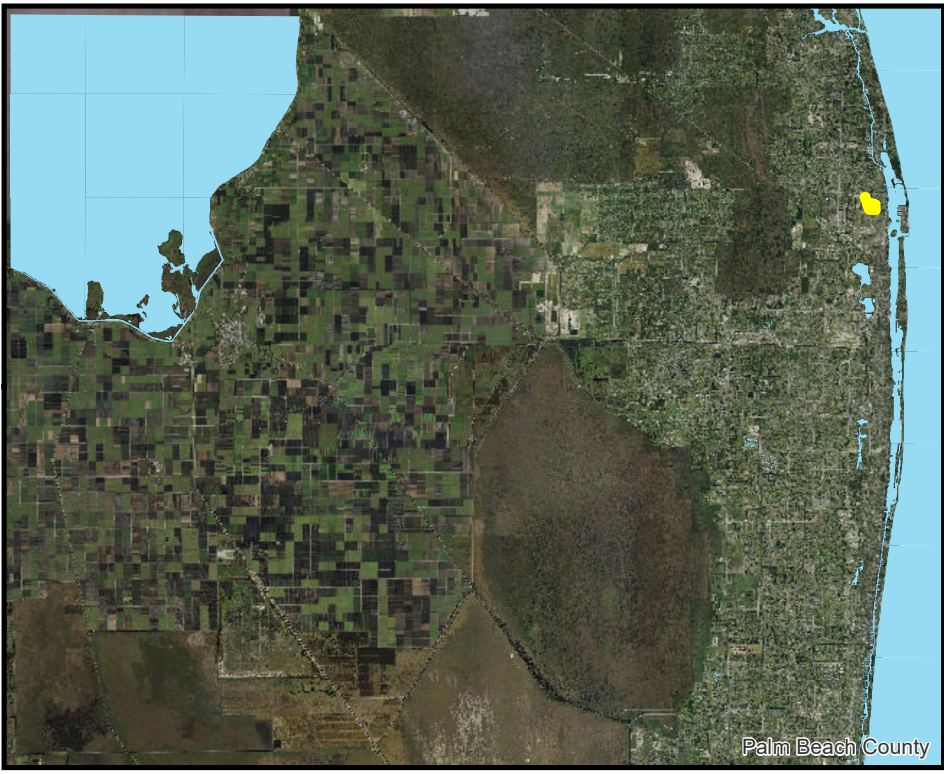
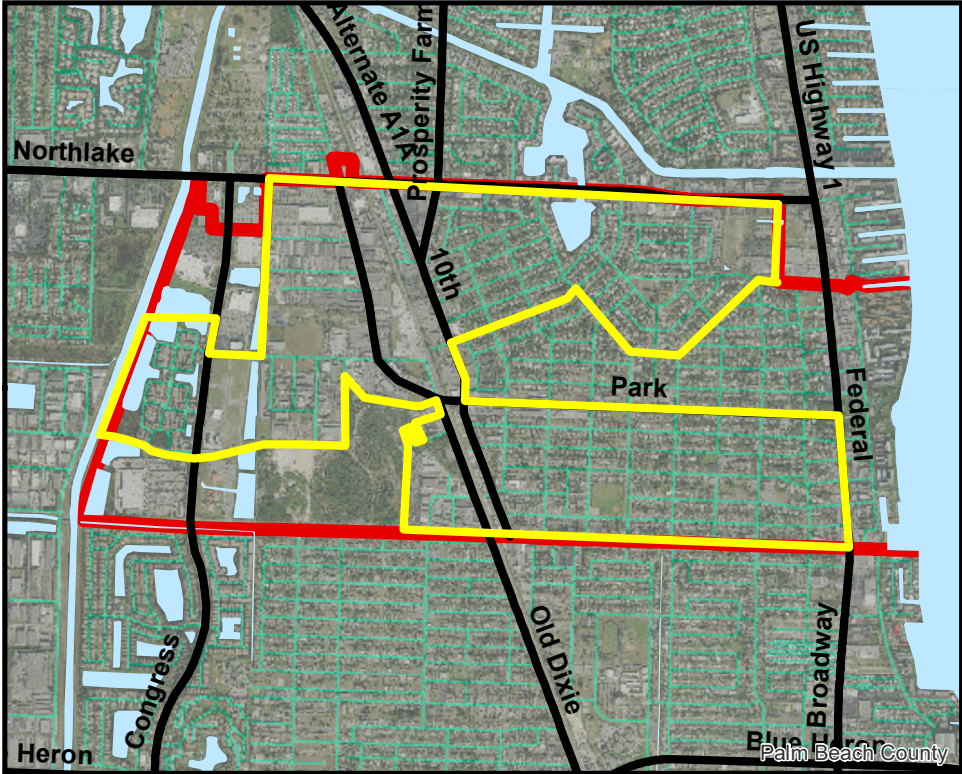
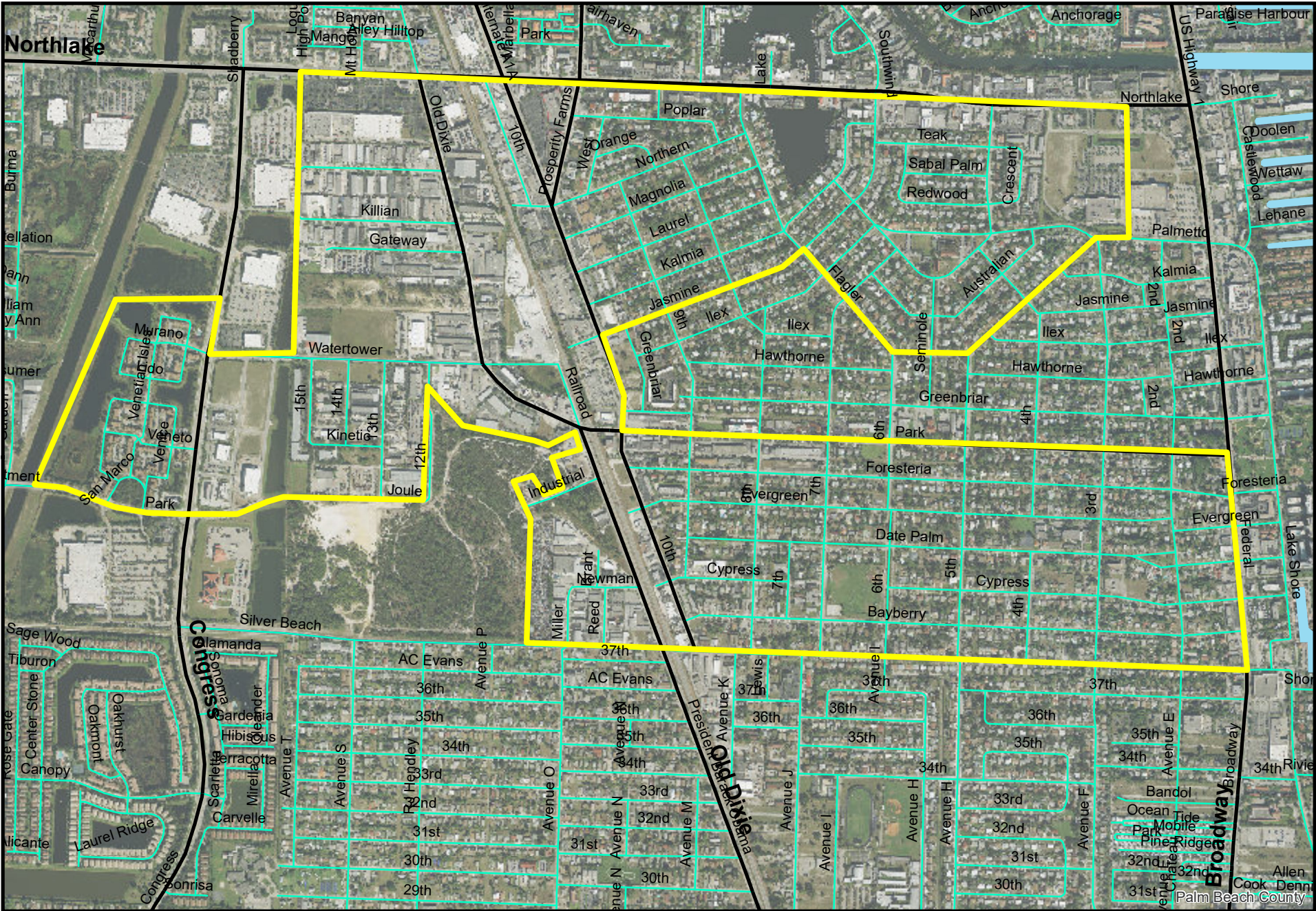


Source: 2011-2015 American Community Survey (Low/Mod Income)

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

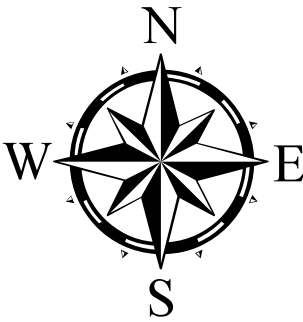


Palm Beach County
Community Development Block Grant Program
Town of Lake Park - CDBG Target Area



Legend

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

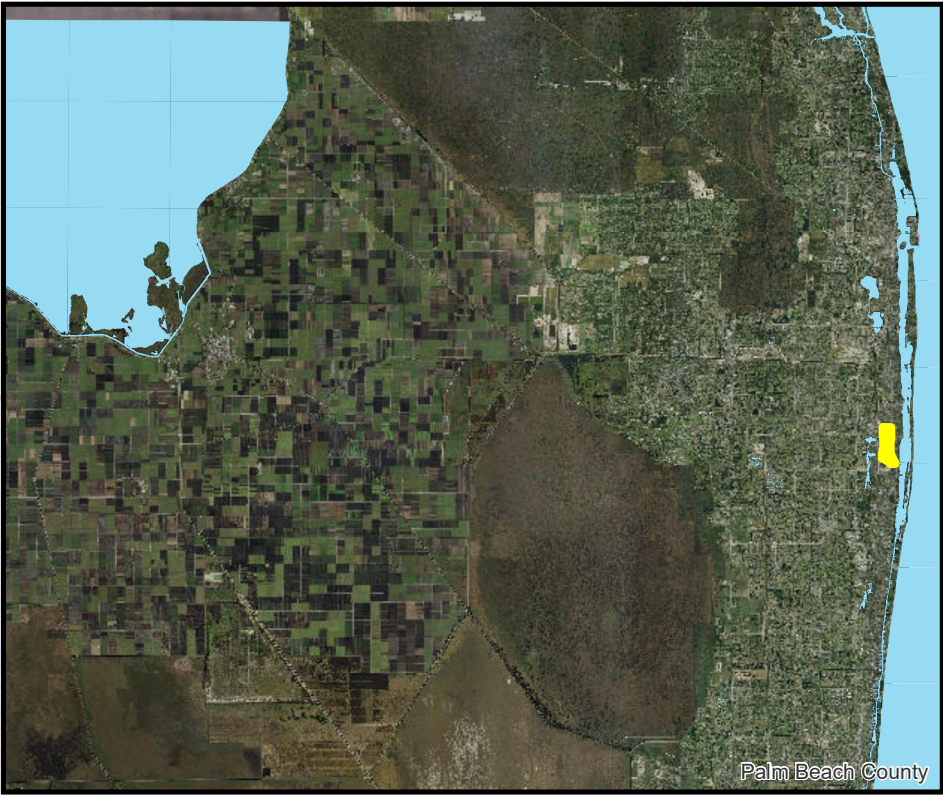
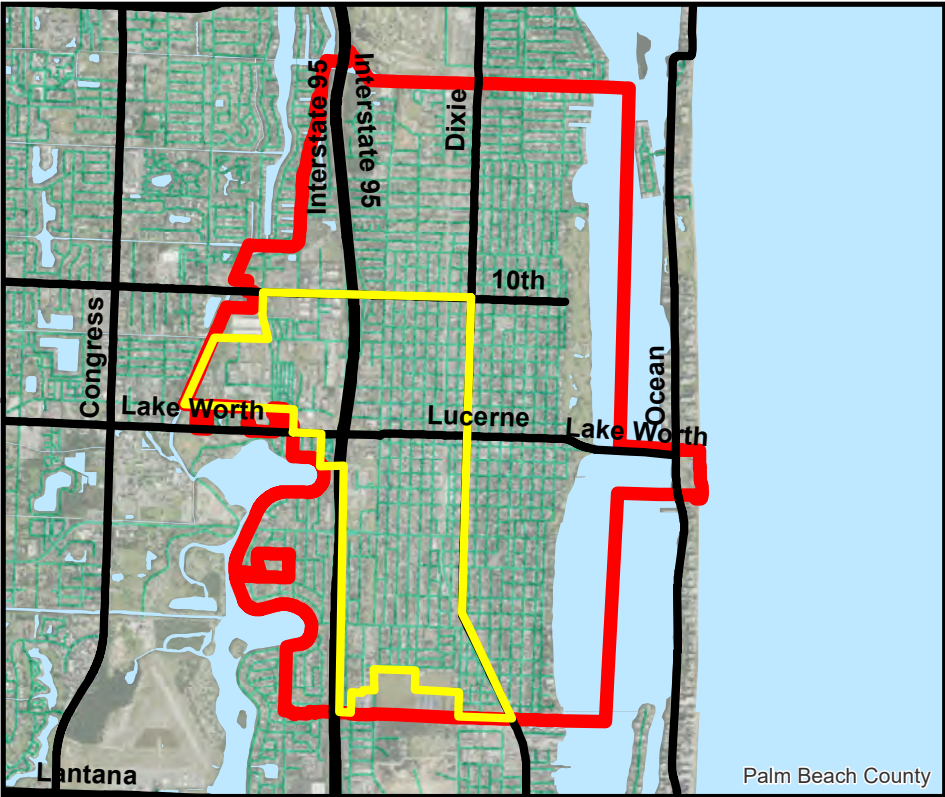
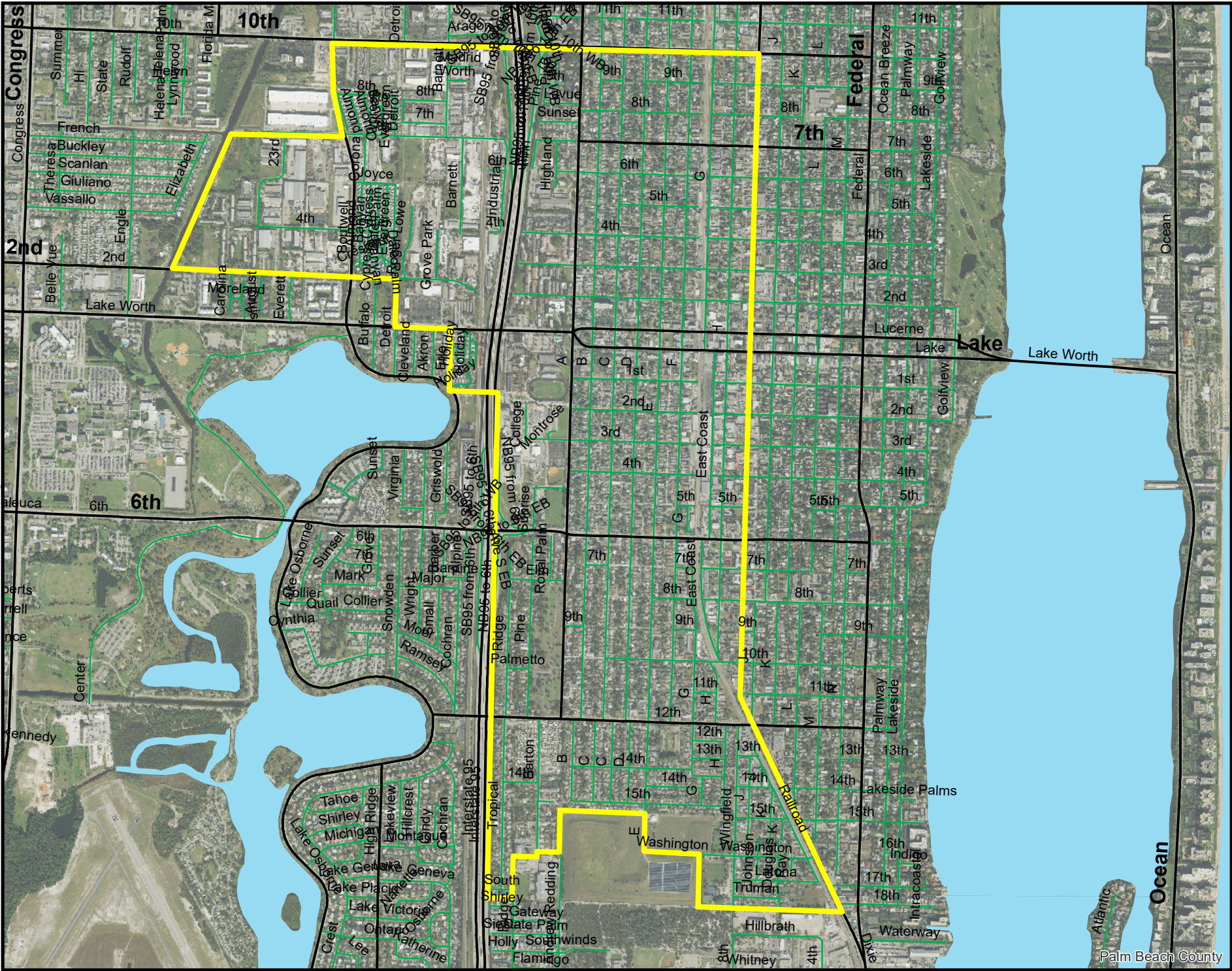


Source: 2011-2015 American Community Survey (Low/Mod Income)

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



CDBG Target Area

Municipal Boundaries

Water Bodies

Major Roads

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W

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S

Department of Housing & Economic Development

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

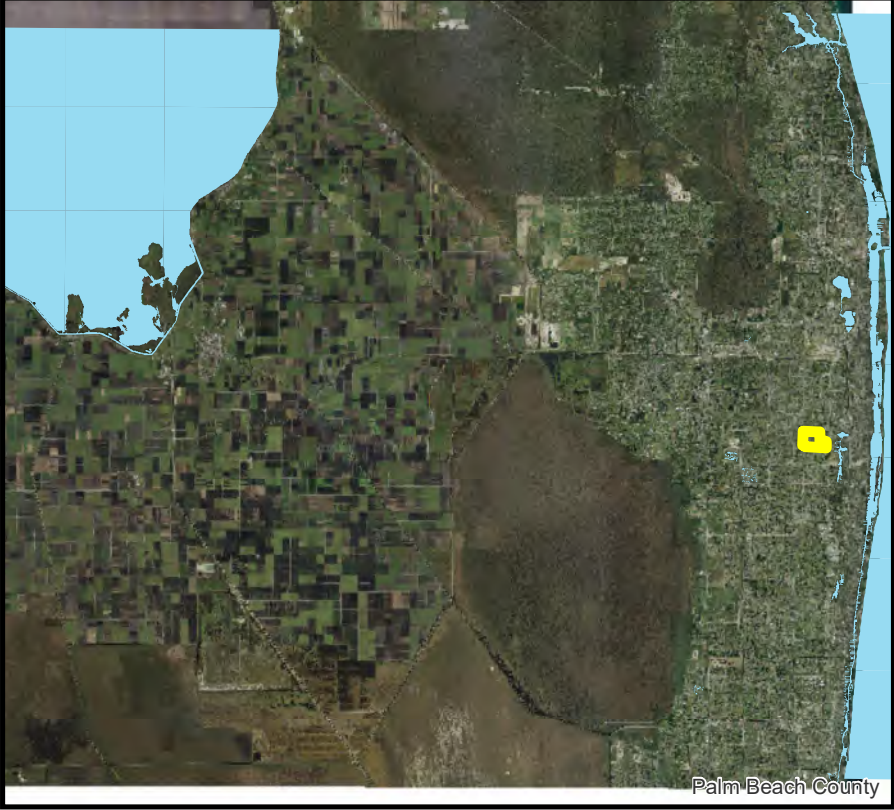
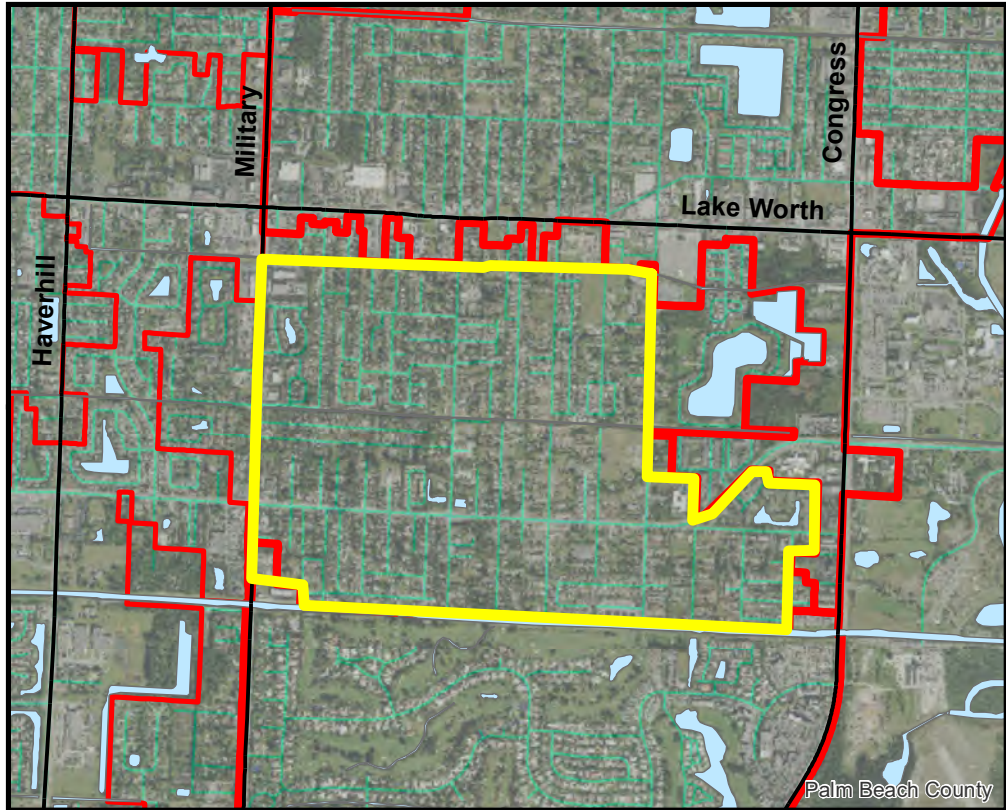
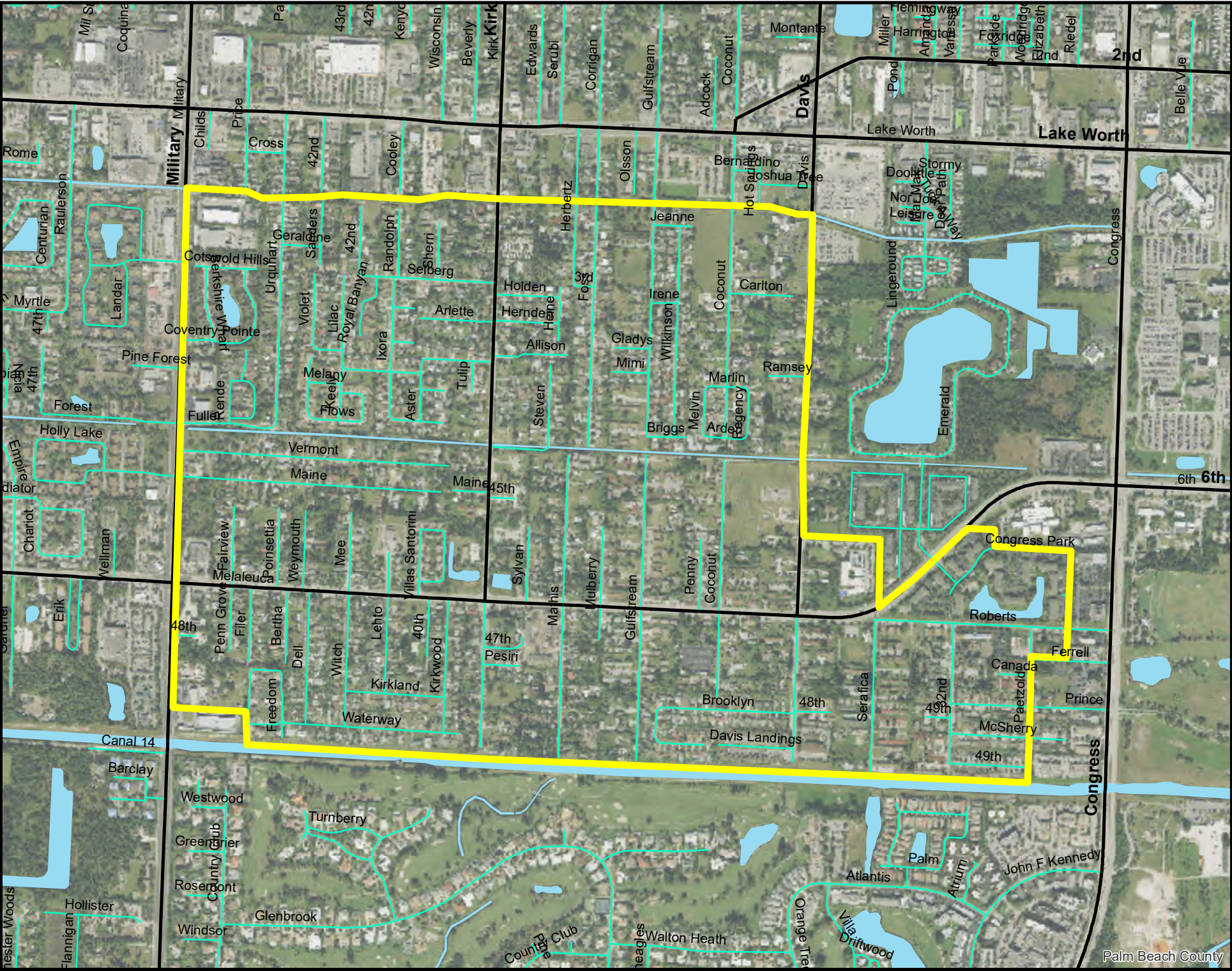
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Palm Beach County

Community Development Block Grant Program

Lake Worth Corridor - CDBG Target Area



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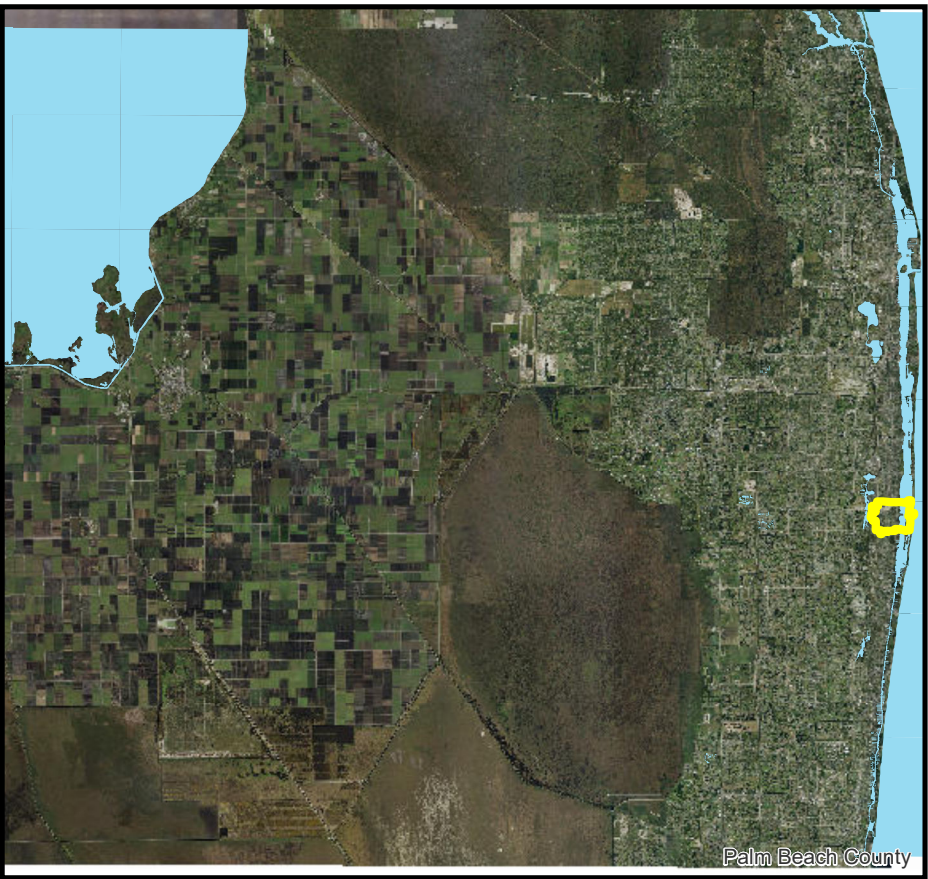
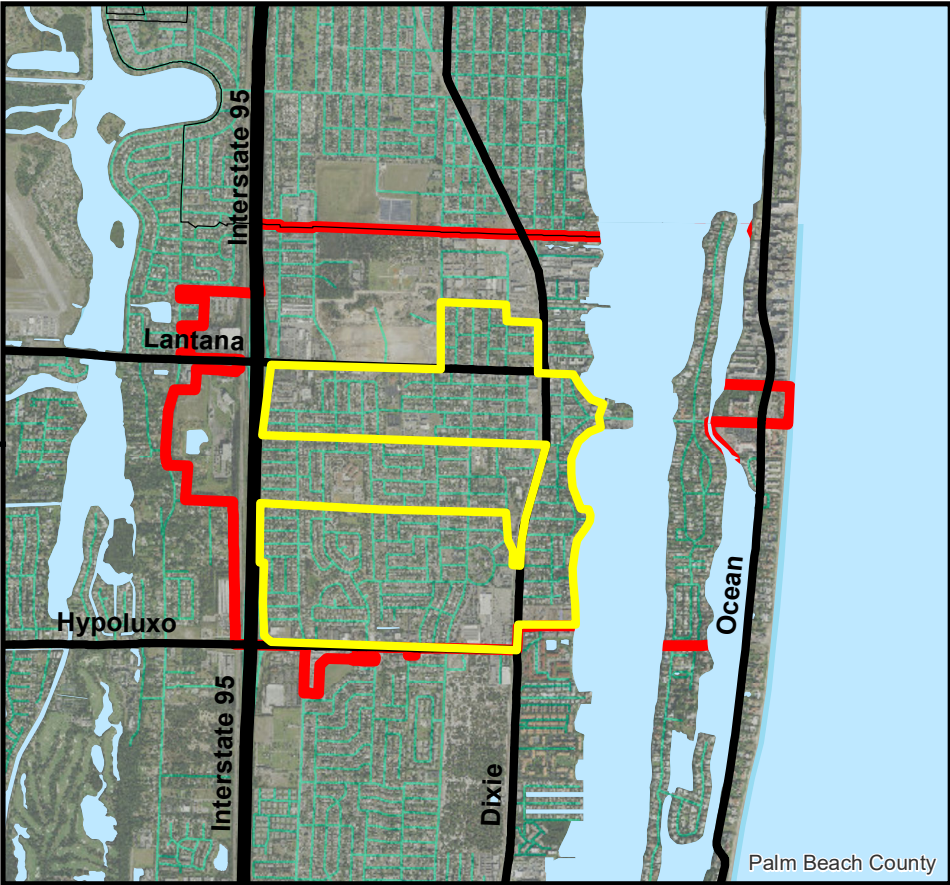
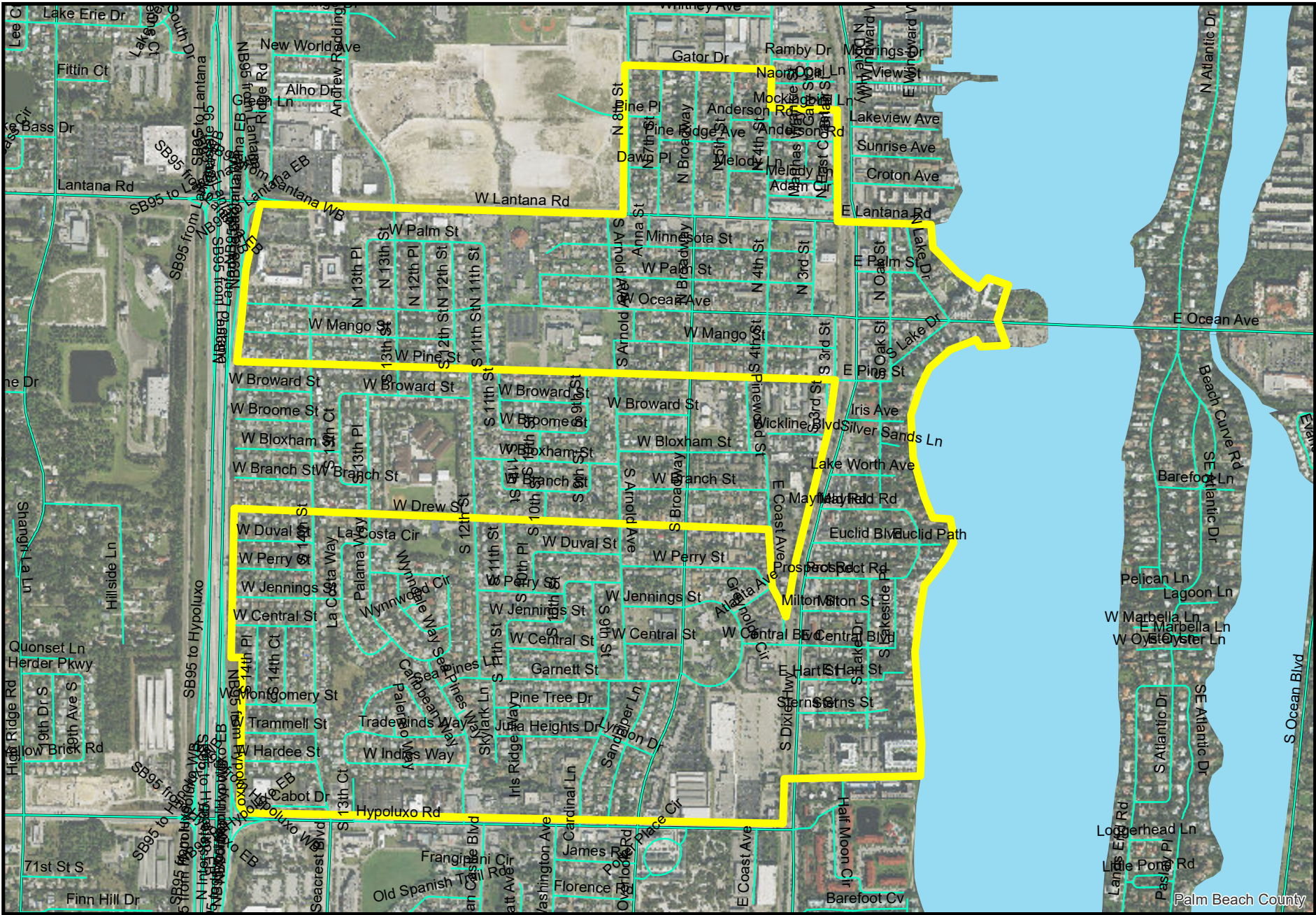
- CDBG Target Area
- Municipal Boundaries
- Water Bodies
- Major Roads



Source: 2011-2015 American Community Survey (Low/Mod Income)
Prepared by PBC Department of Housing and Economic Development - May 2024

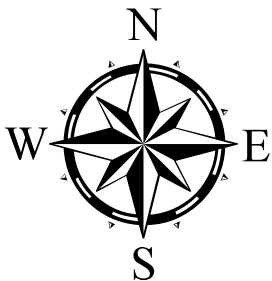


Palm Beach County Community Development Block Grant Program Town of Lantana - CDBG Target Area



Legend

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

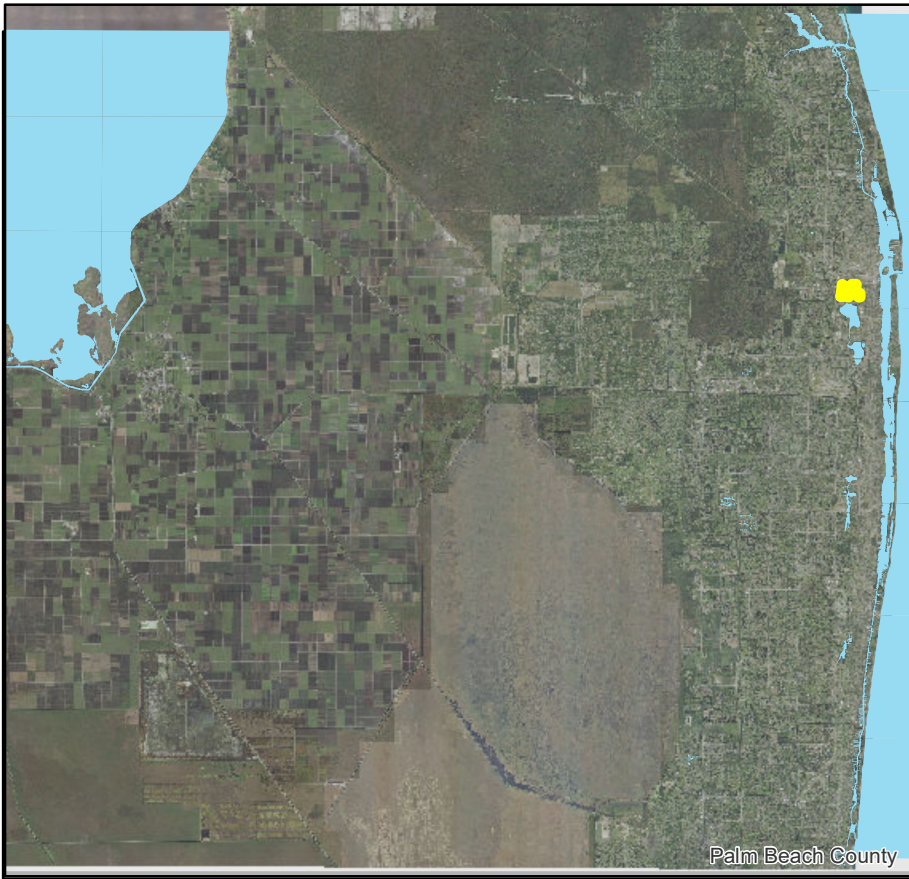
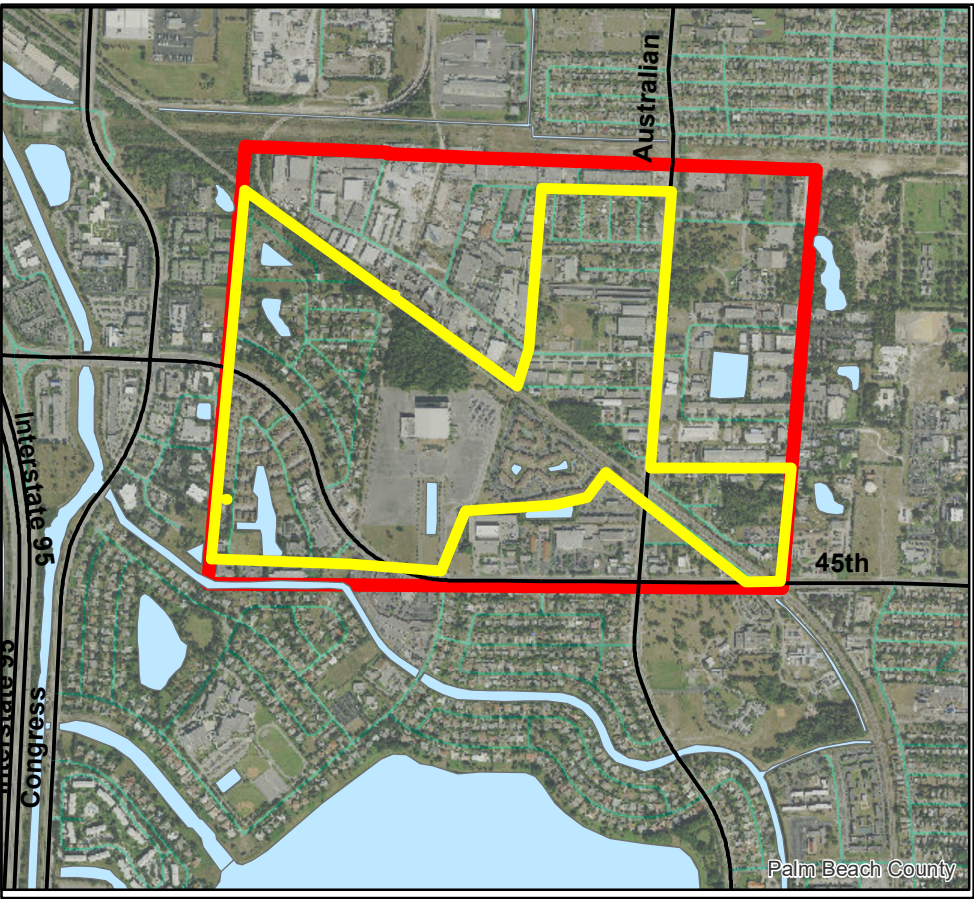
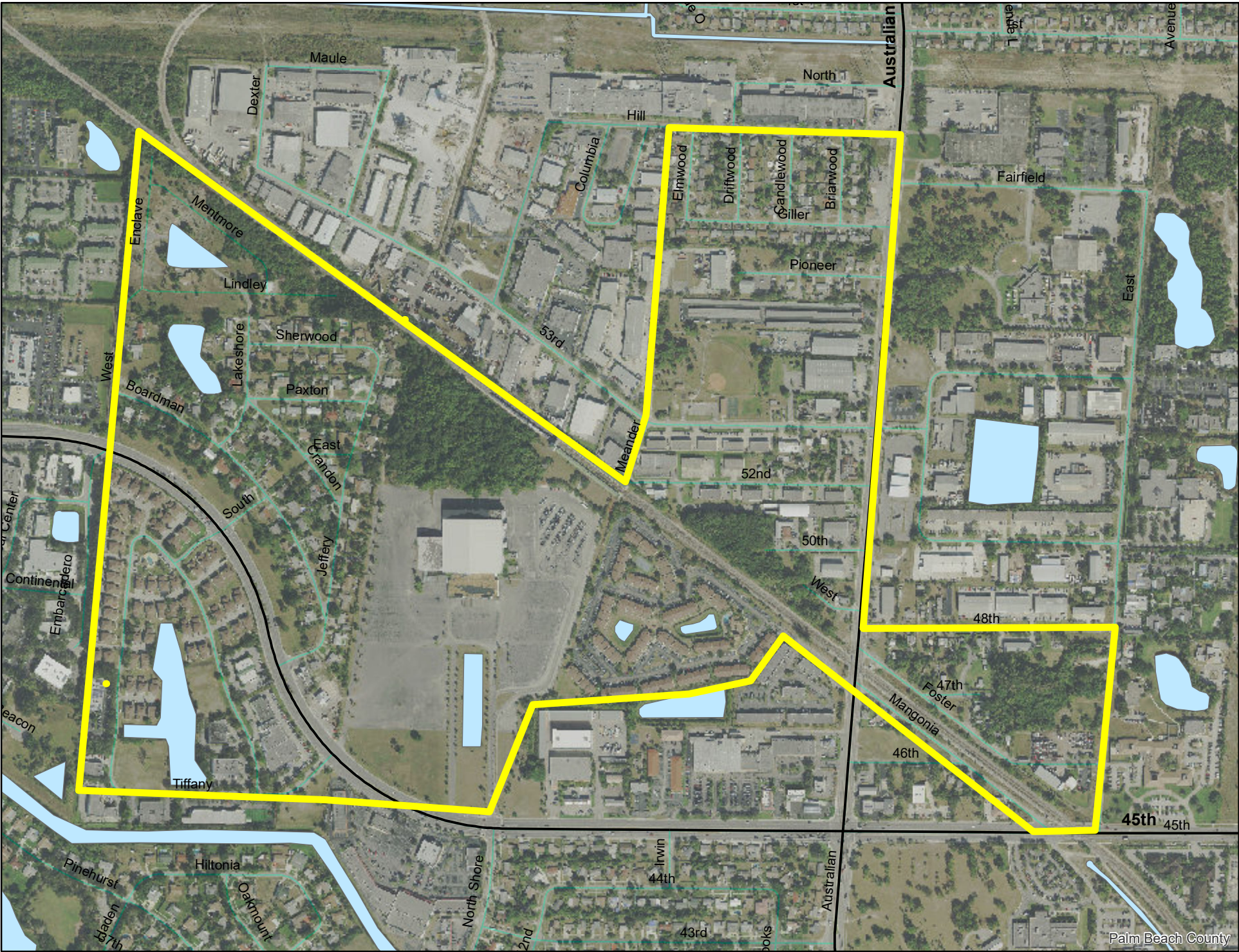


Source: 2011-2015 American Community Survey (Low/Mod Income)

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

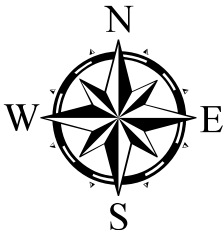


Palm Beach County
Community Development Block Grant Program
Town of Mangonia Park - CDBG Target Area



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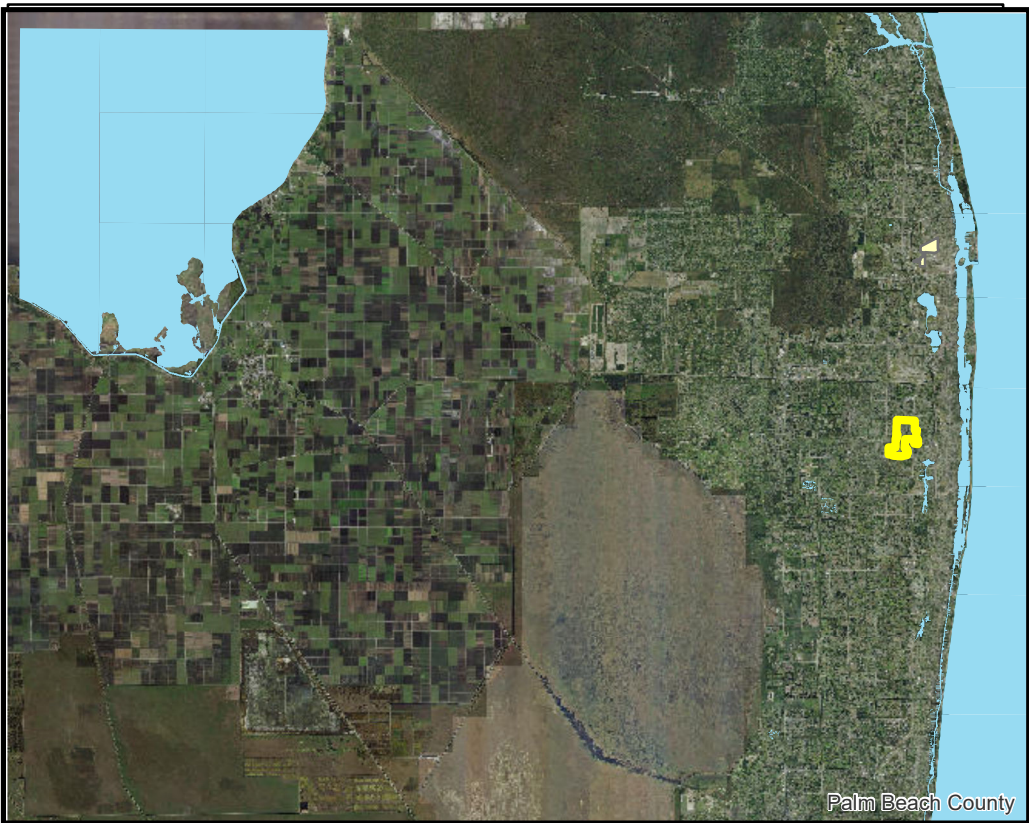
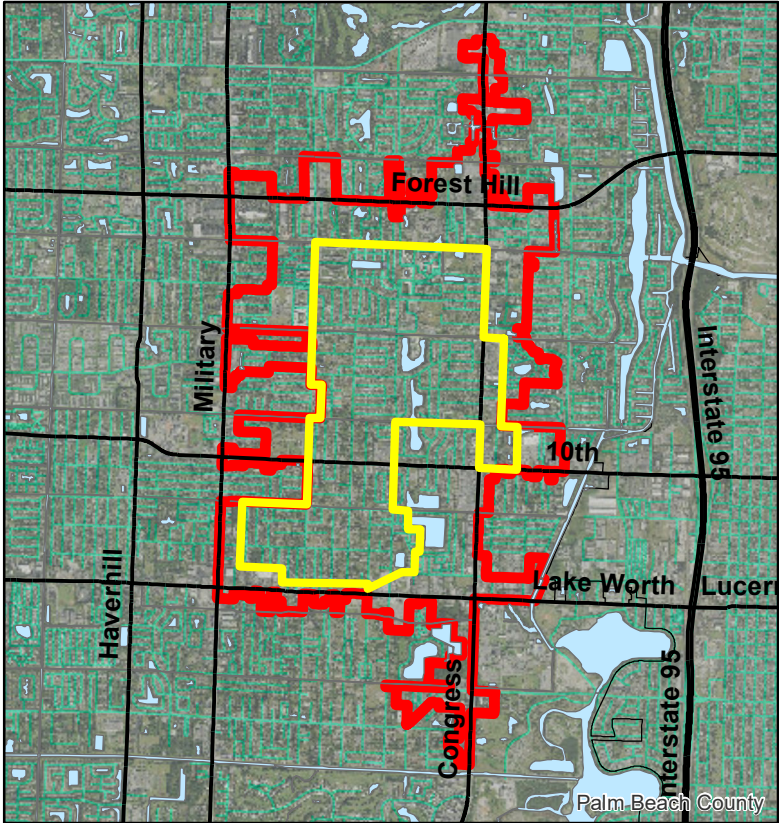
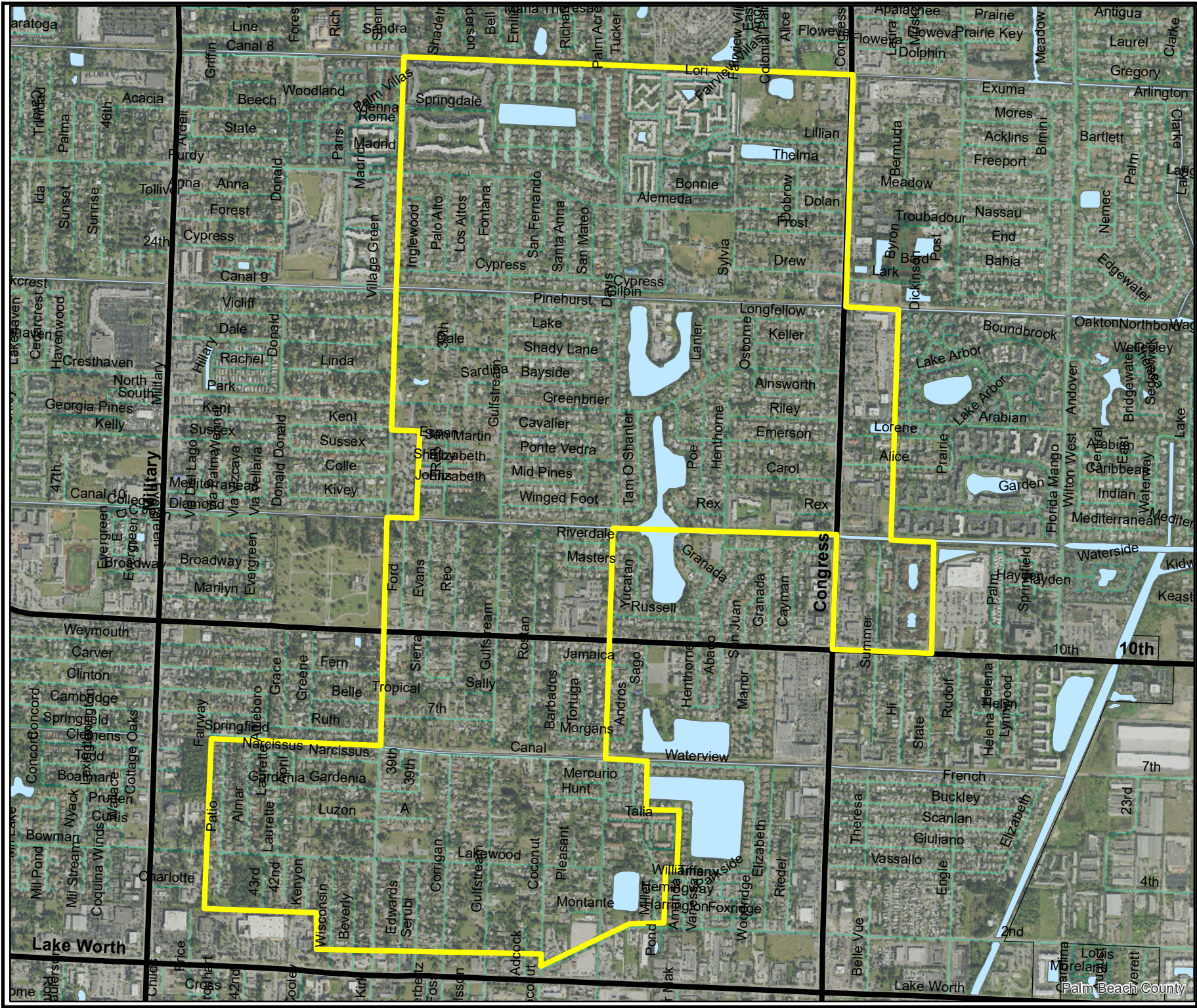
-  CDBG Target Area
-  Municipal Boundaries
-  Water Bodies
-  Major Roads



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

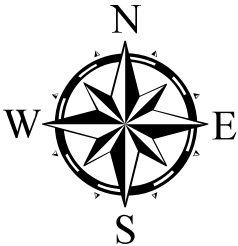


Palm Beach County
Community Development Block Grant Program
Village of Palm Springs - CDBG Target Area



Legend

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



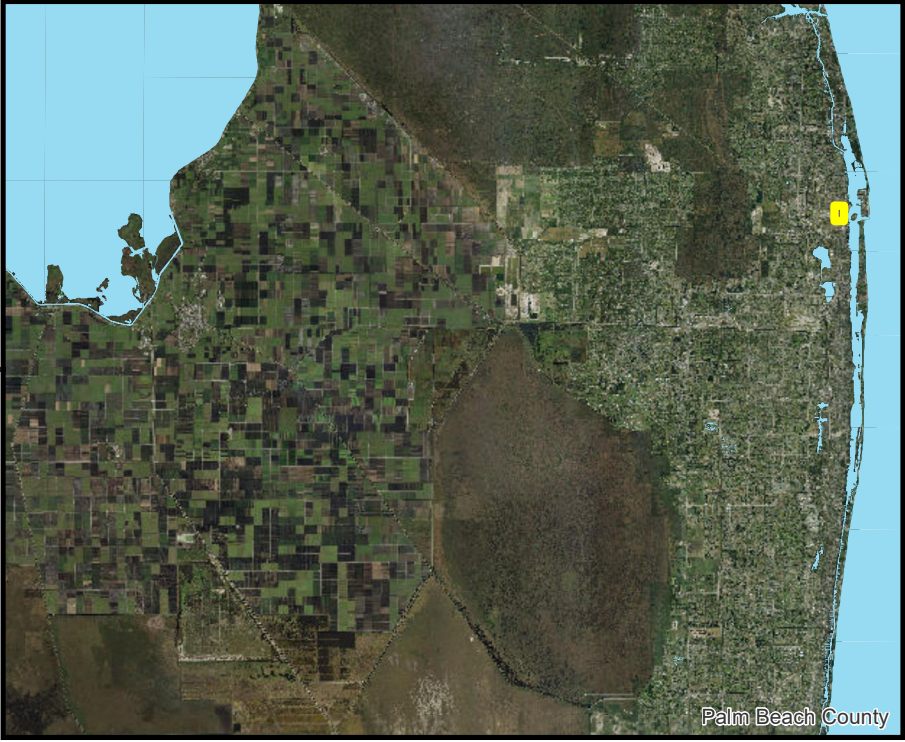
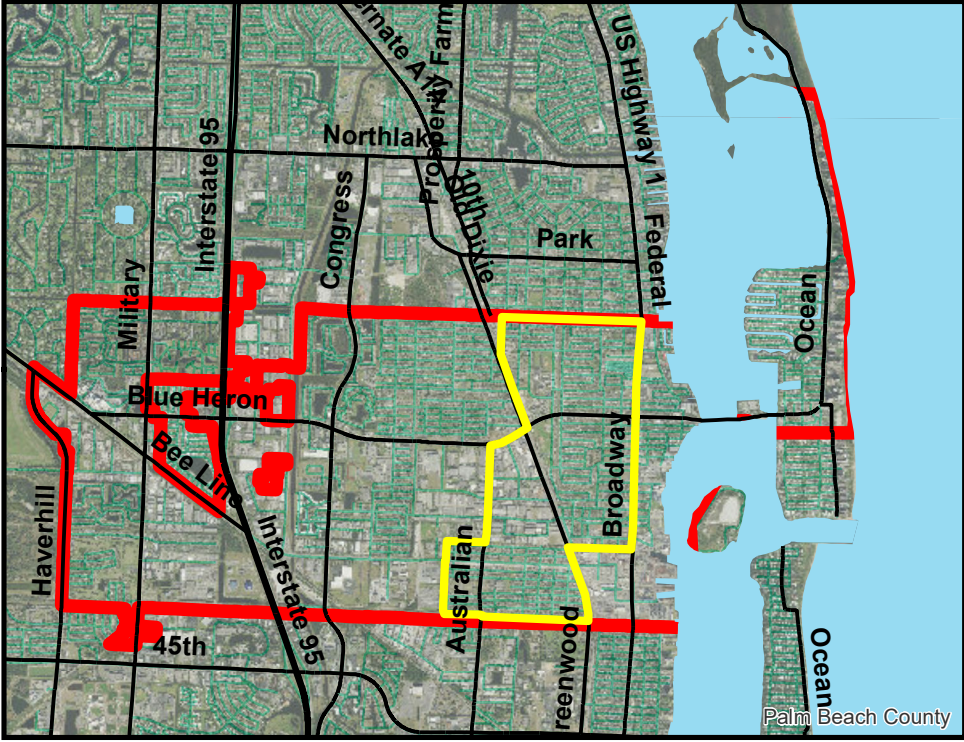
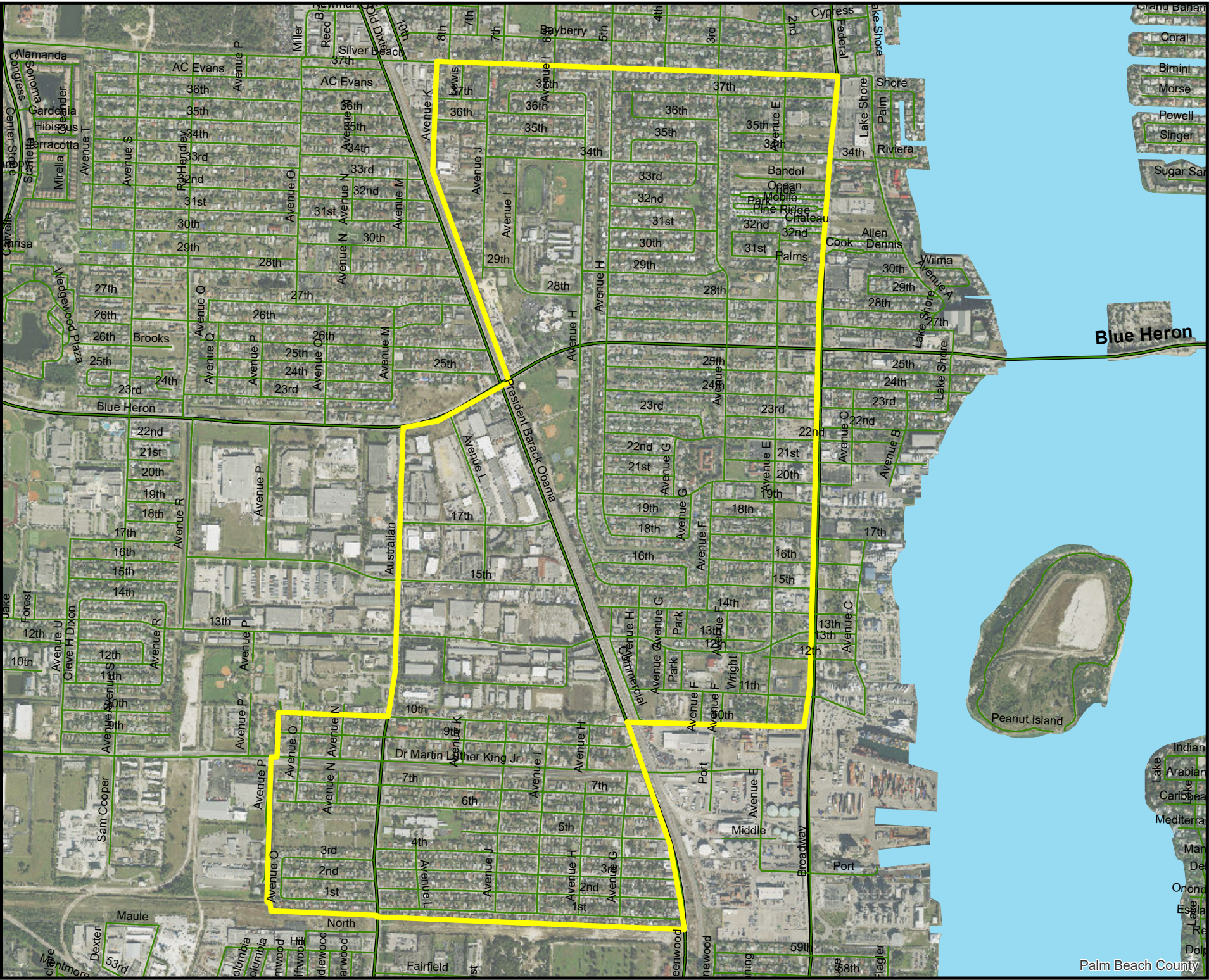
Source: 2011-2015 American Community Survey (Low/Mod Income)
Prepared by PBC Department of Housing and Economic Development - June 2021



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

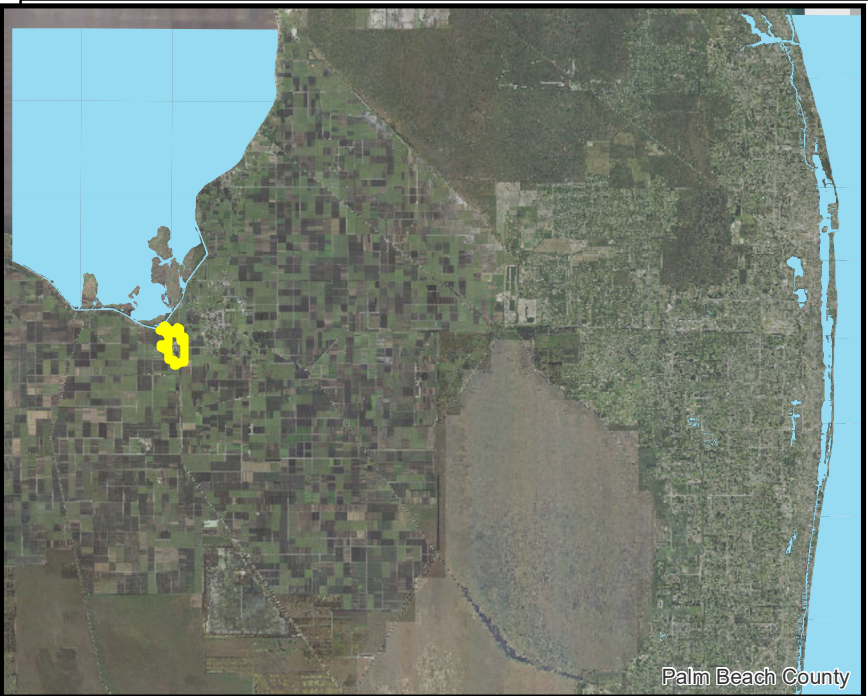
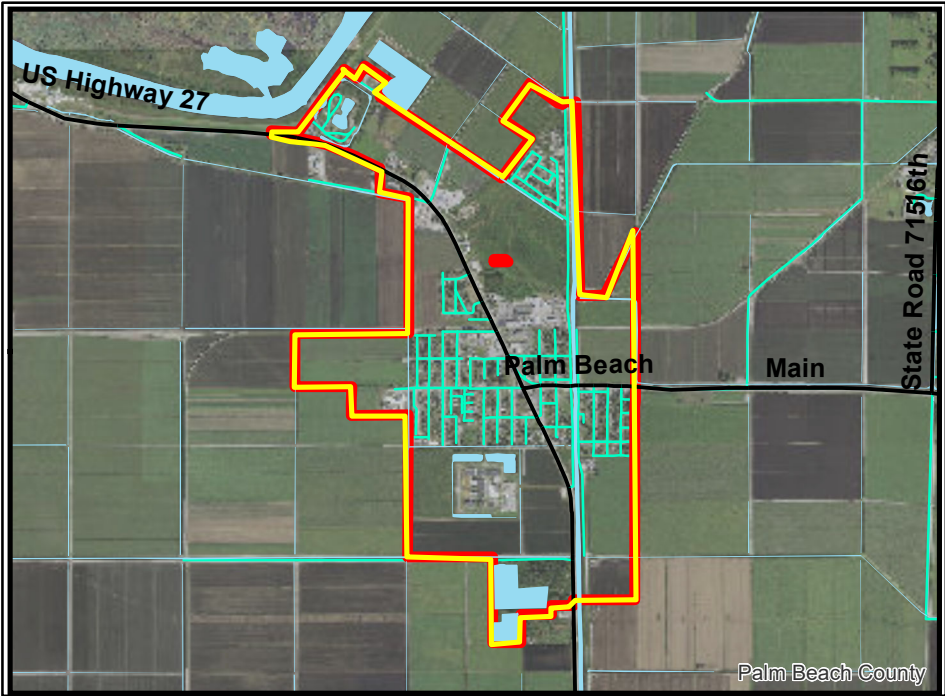
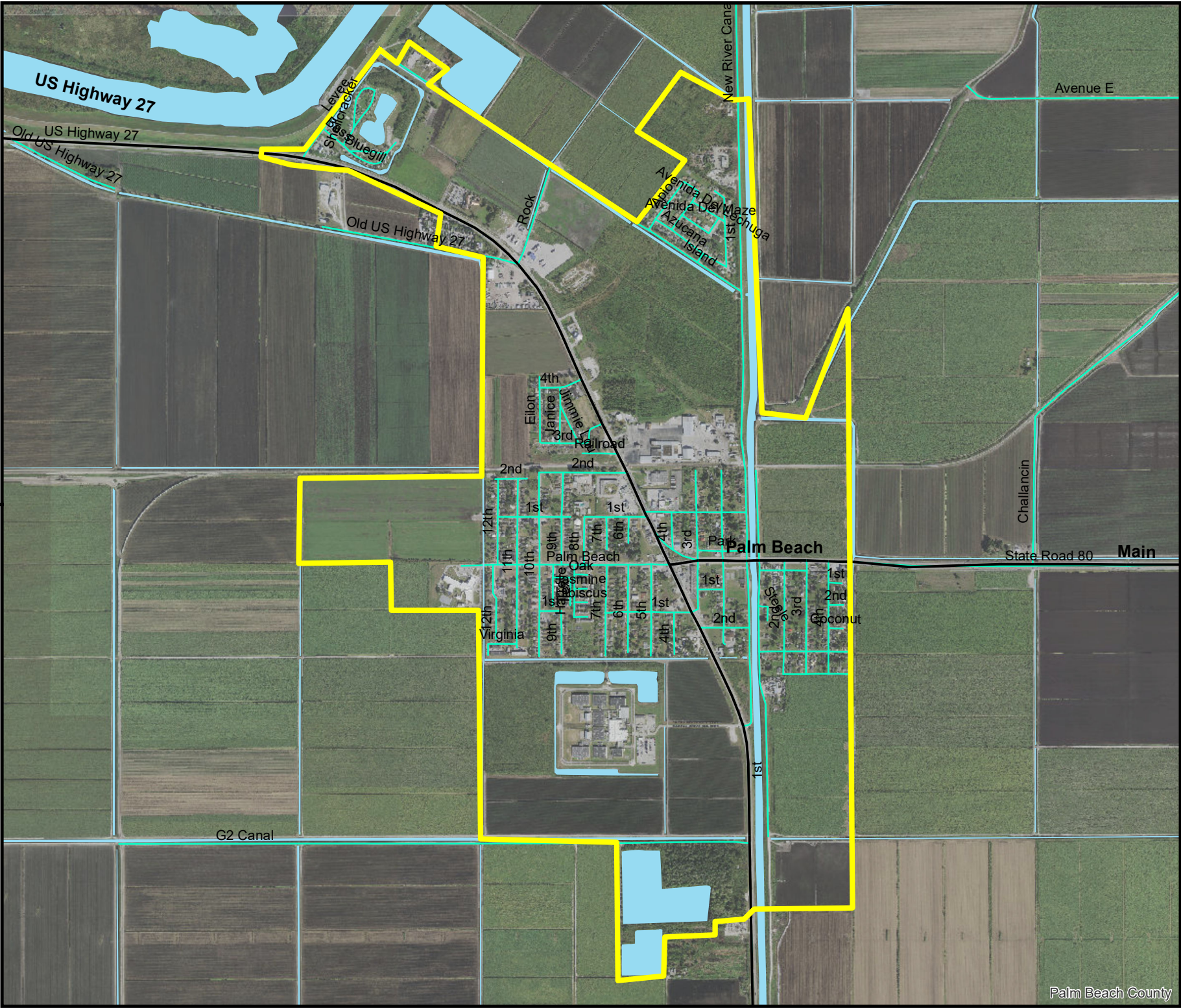
Department of Housing & Economic Development

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

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

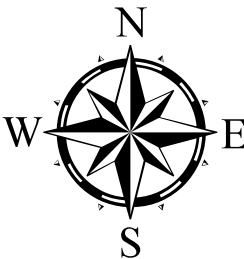


Palm Beach County
Community Development Block Grant Program
City of South Bay - CDBG Target Area



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	120
Non-Homeless	882
Special-Needs	0
Total	1,002

One Year Goals for the Number of Households Supported Through Programs	
Rental Assistance	120
The Production of New Units	521
Rehab of Existing Units	290
Acquisition of Existing Units	71
Total	1,002

Discussion

It is anticipated that a total of 1,002 eligible households will be provided with affordable housing assistance during FY 2024-2025. Two hundred twenty-five (225) owner households are expected to receive assistance via acquisition of new or existing units, rehabilitation of owner housing units, foreclosure prevention or mortgage assistance. It is estimated that seven hundred seventy-seven (777) 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 and HOME Tenant Based Rental Assistance (TBRA) Program. A summary of each program is shown below.

Project-Federal	Activity Owner	Projected Funding	# Assisted
CHDO Set-Aside (HOME)	Affordable Owner – New Construction	\$440,000	2
Purchase Assistance	Affordable Owner - Acquisition	\$1,041,524	11
Owner Federal Total:		\$1,481,524	13
Project-State	Activity-Owner	Projected Funding	# Assisted
Purchase Assistance (SHIP)	Affordable Owner- Acquisition	\$2,000,000	20
Owner Occupied Housing Rehabilitation (SHIP)	Affordable Owner- Rehabilitation	\$2,000,000	20
Emergency Repair (SHIP)	Affordable Owner - Rehabilitation	\$1,500,000	30
Foreclosure Prevention (SHIP)	Affordable Owner – Acquisition	\$609,864	30
Single Family New Construction (SHIP)	Affordable Owner – New Construction	\$1,000,000	10
Owner State Total:		\$7,109,864	110
Project-Local	Activity-Owner	Projected Funding	# Assisted
Housing Finance Authority (Bond Program)	Affordable Owner – Acquisition	\$3,000,000	10
Housing Finance Authority (Revolving Loan Program)	Affordable Owner – New Construction	\$6,500,000	92
Workforce Housing (WFH)	Affordable Owner – New Construction	\$1,618,083	0
Owner Local Total:		\$11,118,083	102
Overall Owner Total:		\$19,709,471	225
Project-Federal	Activity-Rental	Projected Funding	# Assisted
Adopt-A-Family (ESG)	Rapid Re-housing Homeless - Rental Assistance	\$192,957	70
Tenant Based Rental - TBRA (HOME)	Homeless Prevention – Rental Assistance	\$500,000	50
Renter Federal Total:		\$692,957	120
Project-State	Activity-Rental	Projected Funding	# Assisted
Developer Assistance Rental Housing (SHIP)	Affordable Rental – New Construction/Rehabilitation	\$1,000,000	3
Renter State Total:		\$1,000,000	3
Project-Local	Activity-Rental	Projected Funding	# Assisted
Housing Finance Authority (Bond Program)	Affordable Rental – New Construction & Rehabilitation	\$170,000,000	654
Rental Local Total:		\$170,000,000	654
Overall Renter Total:		\$171,692,957	777

AP-60 Public Housing – 91.220(h)

Introduction

Palm Beach County has seven (7) housing authorities operating within its boundaries. Four (4) operate within PBC Urban County Program Jurisdiction. Of these four (4), the Riviera Beach Housing Authority (RBHA) has neither public housing nor vouchers. The Belle Glade Housing Authority operates under the U.S. Department of Agriculture. This section will focus on the two remaining Housing Authorities, 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 212 authority owned units. They also administer a combined 3,262 housing choice vouchers and 290 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 of public housing residents

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

Pahokee Housing Authority (PHA):

- Apply for Choice Neighborhood Planning Grant.
- Explore United States Department of Agriculture (USDA) funding to expand affordable housing in the region.
- Partner with Palm Beach County Sheriff's Office (PBSO) Community Policing deputies to address effective strategies on crime awareness and prevention.
- PHA will continue to partner with Palm Beach County HED to identify available grants to support infrastructure and renovations to improve the quality of assisted living.

Palm Beach County Housing Authority (PBCHA):

- Continue to evaluate its Low Income Public Housing and Housing Choice Voucher program utilization to maximize funding, and utilize 100% of its vouchers and occupancy of its 428 Low Income Public Housing units.
- Address Housing Related Hazards (HRH) through its 4.8-million-dollar grant to evaluate and reduce health hazards within its housing units related to mold, and comply with the National Standards for the Physical Inspection of Real Estate (NSPIRE).
- Implement crime prevention measures at its Seminole Manor public housing site through its \$250,000 Public Housing Capital Fund Emergency Safety and Security grant.

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):

Residents are encouraged to participate in Pahokee Housing Authority (PHA) board meetings, tenant meetings, and policy development. Pahokee Housing Authority (PHA) will continue to engage its Resident Advisory Board (RAB) in setting goals and objectives during the Agency Annual Plan process. PHA will continue collaborating with agencies to provide trainings geared towards persons looking to educate themselves on the First Time Homebuyer programs.

Palm Beach County Housing Authority (PBCHA):

Palm Beach County Housing Authority (PBCHA) will continue to support the creation of a Resident Advisory Board (RAB) and Residents Councils to make recommendations on the Annual Plan, Capital Five Year Action Plan. The Palm Beach County Housing Authority (PBCHA) will adopt rent policies and assess programs that support and encourage employment.

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

Pahokee Housing Authority (PHA)

The Pahokee Housing Authority (PHA) is designated as a “High Performer” in both of its Public Housing and Section 8 Housing Choice Voucher (HCV) programs.

Palm Beach County Housing Authority (PBCHA)

The Palm Beach County Housing Authority (PBCHA) is currently designated as troubled within its Housing Choice Voucher (HCV) program. The housing authority remains strongly focused on continued and improved operations, and on increasing compliance and accountability.

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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 1,700 unsheltered persons with referrals during FY 2024-2025 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 2024-2025. 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 300 homeless persons will

attend the various Homeless Connect events.

- The Senator Phillip D. Lewis Center will continue to be a 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 continues to operate the Belle Glade Assessment and Intake Center in western Palm Beach County. The Center is the point of coordinated entry into the homeless system of care for residents living in the western portion of the county. The County's Outreach Team as well as law enforcement can refer homeless individuals and families to the Assessment Center.
- The County's second homeless resource center opened in the winter of 2024. The facility has seventy (70) emergency beds and fourteen (14) temporary beds and operates in the same manner as the Lewis Center. This facility also serves as a point of entry for the homeless population to access services. A County Sheriff's substation is also housed at the facility.
- The Homeless Coalition will offer Warm Welcome Kits to any homeless person that comes through the Lewis Center regardless if they receive assistance or not. This program provides individuals a 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 2024 (November 18-26, 2024). 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 as well as youth who have aged out of state foster care programs.

- The County will continue to use CDBG dollars to support the operation of three (3) county-owned emergency shelters. The Lewis Center will provide shelter and supportive services to homeless individuals, Program REACH facility will provide shelter and support services to homeless families with children and Melissa's Place will provide emergency shelter to persons in the western communities. It is anticipated that during the upcoming fiscal year 1,700 homeless individuals and 200 homeless families will receive services from these three shelters.
- For FY 2024-2025 the County's Homeless and Housing Alliance (HHA) prioritized the emergency shelter and rapid rehousing components for the County's ESG program.
- The County will continue to provide CDBG funding to support housing facilities that provide shelter and supportive services to domestic violence victims.
- 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 has allocated HOME ARP funding for the construction of a rental development to consist of 18 townhomes to provide housing to homeless families.
- The County will use CDBG dollars to provide emergency shelter in the form of motel/hotel vouchers to homeless families.
- Palm Beach County's Parks to Work initiative continues 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.
- 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 emergency or transitional facilities.
- Melissa's Place, a 40-unit facility in Pahokee will continue 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) funding to support 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.
- ESG dollars will support a rapid rehousing program that targets homeless families during the upcoming fiscal year.
- FAA funding will be allocated various non-profit agencies 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 extra points during the grant review process to projects that serve the chronic homeless population.
- 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 eligible 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 and demonstrate their ability to become self-sufficient after receiving the assistance.
- The County continues 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.
- Palm Beach 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. 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 25 who have aged out of the foster care system. The County also utilizes CDBG funding to provide life skills training to this population.
- The County has allocated HOME ARP funding for the construction of a 12-unit rental development for youth 18 to 25 years of age who are transitioning from 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 County allocated CDBG-CV funds to rehabilitate the Lewis Center that will create six (6) beds for the provision of medical care for homeless persons who cannot recover independently from an injury or illness.
- 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 three (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 have been renewed for the upcoming fiscal 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.

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

Introduction:

Palm Beach County continues to work to identify and remove barriers that limit the preservation and/or production of affordable owner and rental housing units for County residents. These barriers stem from a multitude of factors, such as current housing market conditions, the prevailing economic climate, legislative policies, land use and zoning policies, and changing household demographics.

Affordable housing barriers faced by Palm Beach County include, but are not limited to, an insufficient supply of available land for residential development; increased labor and material costs for construction; substantial increases in property insurance premiums; rapidly increasing population/net household migration in the County; land use requirements/density regulations; household income not keeping pace with rising housing costs; shortages (decline) in the supply of affordably priced units due to rapid market appreciation; and insufficient funding resources dedicated to the creation and preservation of affordable housing.

1. Describe the actions that will take place during the next year to remove or ameliorate 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

The County, in its effort to promote affordable housing and to remove identifiable barriers to affordable housing, will implement the following strategies for FY 2024-2025:

- The County's Affordable Housing Advisory Committee, the Commission on Affordable Housing (CAH), evaluates existing policies, procedures, ordinances, and land development regulations on an annual basis and recommends actions and initiatives that will encourage the development and preservation of affordable housing.
- County voters approved a \$200,000,000 bond referendum to provide funding to increase workforce and affordable housing units within the County. To date, three (3) Requests for Proposals (RFPs) for the development of new Workforce Housing, Affordable Housing, and For-Sale Housing units have been issued.
- The "Housing for All" Plan, prepared by The Housing Leadership Council of PBC, was endorsed by the Board of County Commissioners in January 2024. The Plan serves as a blueprint for how to achieve a significant increase in workforce and affordable housing with the goal of producing, rehabilitating, and preserving a total of 20,000 units by the year 2032.

- HOME American Rescue Plan (HOME-ARP) funds are available through an ongoing NOFA for the creation of housing units and residential facilities for qualifying populations, including the homeless, those at risk of homelessness, and those experiencing housing instability. Funds will support the addition of units through new construction of multi-family housing and acquisition/rehabilitation of existing properties.
- The County has created a Housing Dashboard that tracks affordable and workforce housing projects located within Palm Beach County. It serves to provide information to the public regarding the status and availability of affordable and workforce housing units.
- The Impact Fee Affordable Housing Assistance Program utilizes investment earnings from impact fees collected on roads, parks, and public buildings to offset impact fees on the development of affordable housing projects for households at or below 140% of Area Median Income.
- The Planning, Zoning & Building Department (PZB) implements a mandatory Workforce Housing Program. The program 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 units is furthered by certain incentives including density bonuses up to 100%, expedited approvals, and mitigation to traffic performance standards allowing up to 30% greater volume on affected roadways.
- PZB implements a voluntary Affordable Housing Program which stimulates the development of affordable units with deeper income targeting (<60% AMI) in new developments of 10 or more units located in the unincorporated county. It requires 65% of total project units to be affordable in exchange for density bonus incentives.
- The County inventories all surplus County-owned land and foreclosed properties and regularly monitors to determine feasibility for affordable housing development. If so, land grants may be provided by the County to private not-for-profit organizations to develop.
- PBC Water Utilities Department's Deferred Payment Program reduces the financial impact on property owners of assessments levied for installation of public water and sewer systems. It allows assessments to be paid back over 20 years with a 5.5% annual interest rate.
- The Property Appraiser administers property tax exemptions, which reduce a property's assessed value and annual property taxes paid. Current exemptions are: Homestead, Active Military, Civilian Disability, Disabled Veterans, Senior Citizen, Quadriplegic, Granny Flats, Legally Blind, and Widow/Widower. Florida's Save Our Homes Portability Transfer provision allows currently homesteaded homeowners to transfer the accumulated

difference between the assessed value and market value (up to \$500,000) to a new home that qualifies for homestead exemption.

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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 2024-2025, 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, Glades Technical Advisory Committee, 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 support funding applications from other entities within its jurisdiction.
- Address infrastructure deficiencies in low-and moderate-income areas (including identified CDBG Target Areas) through funding under the CDBG Program and the County's Infrastructure Sales Tax.
- 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.

- 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. Services include crisis utility and HVAC system replacement.
- Encourage private investment/development in the County's designated low-income census tracts under the Federal Opportunity Zone Program.
- On November 2022, County voters approved \$200M bond referendum (Housing Bond) for the purpose of financing all or a portion of newly created workforce and affordable housing units within Palm Beach County. On October 2023, Palm Beach County Board of County Commissioners approved the Final Housing Bond Allocation Process and General Guidelines. HED has issued three (3) Housing Bond Requests for Proposals (RFPs) for the development of new Workforce Housing, Affordable Housing, and For-Sale Housing units.

Actions planned to foster and maintain affordable housing

During FY 2024-2025, 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. Planned actions include:

- Allocating SHIP funds for the Foreclosure Prevention Program to assist homeowners with delinquent mortgage payments, property taxes and homeowners insurance.
- Providing down payment and closing cost assistance through first and/or second mortgages, financed by the SHIP and HOME programs, for the purchase (and rehabilitation, if necessary) of single-family homes for owner occupancy.
- 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.
- Allocating HOME funding for Tenant-Based Rental Assistance to provide financial assistance to very-low income homeless families and those at risk of homelessness.

- Providing rental assistance and rapid rehousing for homeless prevention using ESG funds.
- Utilizing SHIP funds to carry out owner-occupied housing rehabilitation and emergency repair programs to assist homeowners with property repairs.
- Continuing to provide mandatory orientation and overview of the qualification process to households applying for homeownership subsidies through the Workforce Housing Program.
- Allocating SHIP funding to leverage non-federal and private investments to develop rental and single-family new construction housing units within the County.
- Use of HOME-ARP funding to increase the local inventory of housing and residential facilities for qualifying populations through multi-family new construction and acquisition-rehabilitation of existing properties. Qualifying populations include the homeless, those at risk of homelessness, and those experiencing housing instability.
- Utilizing 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 construct owner-occupied housing units as their principal place of residence.
- Issuance of bonds through the County's Housing Finance Authority for the development or acquisition/rehabilitation of multifamily rental housing for families of low, moderate, or middle income.
- Regular evaluation of policies and procedures that impede affordable and workforce housing through the County's affordable housing advisory committee, the Commission on Affordable Housing (CAH), pursuant to FL §420.9076. The CAH makes recommendations to encourage affordable housing and provides an annual report to the State with recommendations on the implementation of affordable housing incentives within eleven (11) specific areas.
- Continued implementation of the County's Planning, Zoning, and Building (PZB) Department Workforce Housing Program, which mandates that a percentage of rental housing units in new residential developments be provided for households with incomes between 60% and 140% of AMI. The program also provides an optional density bonus incentive to developers to increase the number of total units in a new development in exchange for a portion of the additional units being restricted as workforce units.
- Administering, through PZB, the Affordable Housing Program (AHP), by which developers of new residential developments receive certain development incentives in order to provide affordable housing units to 60% AMI and below households.

- Ensuring that affordable housing subsidized by the County remains affordable for a prescribed period through deed restrictions and ongoing compliance monitoring.
- Ensuring that green building/sustainability standards and energy efficient products are used in affordable housing construction when funding assistance is provided by the County.
- Utilizing funding created through Palm Beach County's \$200M Housing Bond Program to leverage private development funding for the creation of affordable rental and homeownership units in order to increase workforce and affordable housing units in the County. This is an ongoing effort by the County, along with public and private partners, to produce, rehabilitate, and preserve 20,000 housing units over the next ten years.
- Continued support of the "Housing For All" housing plan, endorsed by the Board of County Commissioners in January 2024, to further policies and processes that will generate and preserve affordable and workforce housing within the County.

Actions planned to reduce lead-based paint hazards

HED 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. HED 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. Lead poisoning in young children may produce irreversible neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. Lead poisoning also poses risk to pregnant women. 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 (FDOH). Currently, there are no blood lead levels (BLLs) in children

considered to be safe. The Florida Department of Health Palm Beach County conducts lead investigation in homes of children that have been identified by the Division of Communicable Disease and Epidemiology. Florida Health PBC provide the following services to address and/or reduce lead-based paint hazards:

- Environment assessment – dust wipe and soil sampling
- Interpretation of test results
- Lead Consultation
- Comprehensive environmental investigations
- Recommendations for lead mitigation and abatement, and
- Public education through community outreach.

Actions planned to reduce the number of poverty-level families

According to the 2022 American Community Survey (ACS), 11.4% of Palm Beach County's population lives below the federal poverty level. Of the children that reside in Palm Beach County, 16% live below the federal poverty level. The County is diligently working to reduce this percentage and has implemented a number of measures aimed at addressing this concern. These efforts include implementing family stabilization programs, employment-related supportive services, creating economic opportunities, and the provision of affordable housing.

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

- Advocate for the funding and delivery of supportive services to improve self-sufficiency and economic stability for individuals and families residing in the county.
- Provide opportunities by leveraging available resources so that programs are inclusive to the needs of low-income persons and communities.
- Collect and analyze data to identify the economic needs and characteristics of persons living at or below the poverty level in Palm Beach County.
- Coordinate and share data with other area organizations that plan and develop economic growth and job training.
- Assist migrant and seasonal farmworkers with the opportunity to achieve economic self-

sufficiency through education, skills training, and supportive services.

- Contribute local matching funds for Title 20 subsidized childcare and provide support to migrant and/or low-income working parents in the Glades area.
- Support residents with special needs, to include seniors, veterans, and current members of the armed forces, to obtain independence.
- Fund the Financially Assisted Agencies Program (FAA), which provides funding to non-profit agencies to administer health and human service programs.
- Provide funding to Lutheran Services Florida, a non-profit agency, to administer their Head Start and children services programs that assists low-income children (birth to 5 years), as well as their families.
- Providing CDBG funding to support individuals and families in becoming self-sufficient through educational trainings, health care services, as well various forms of community based support.
- Funding agencies that create jobs opportunities in the community, specifically in low-income areas.
- Encourage private entities to participate in long-term investments in order to create jobs in communities designated as Opportunity Zones.
- Support CareerSource Palm Beach County, which operates three full-service career centers, including one located in the Glades area. They offer job consultation, workshops, and internet/office services for those seeking employment. They also assist in connecting applicants with local businesses who are hiring. Training scholarships are offered to qualifying individuals who are unemployed/underemployed, and are receiving public assistance benefits. Additionally, specialized programs are offered to job seekers with special needs, those transitioning out of public assistance, and released offenders looking to re-enter the workforce.
- 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, a homeless resource center, the new Housing Resource Center, Melissa's Place, as well as Program REACH with CDBG funding.
- Support the Glades Employee Incentive Program to provide incentive payments to

contractors and subcontractors when they hire new full-time employees residing in the Glades Region.

- Utilize ESG funds to support rapid rehousing and emergency shelter activities for the prevention of homeless individuals.
- Use HOME-ARP funds to increase the inventory of housing and residential facilities for qualifying populations, to include individuals and families who are homeless, at risk of becoming homeless, and those experiencing housing instability.
- Utilize SHIP and CDBG-CV funding to prevent homeowners from losing their homes due to foreclosure.

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 provide 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-profit agencies, developers, public agencies, governments and various special purpose committees, the development and determination of funding priorities may take place in separate arenas. 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:

- Provide funding to businesses and incubators, in order to generate jobs for low to moderate income persons;

- Partner with for-profit, non-profits, public agencies and private developers to provide affordable housing to benefit very-low, low, and moderate income persons and families;
- Collaborate with community partners to ensure residents are provided with available supportive services;
- Collaborate with financial institutions and not-for –profit agencies to provide gap financing to households to assist with homeownership;
- Continue to implement the County’s homeless plan, “Leading the Way Home”. The plan serves as the framework for the policies and programs that address homelessness in the county;
- Continue to support the operations of the three (3) Homeless Resource Centers;
- 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;
- 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; and
- Support the implementation of the countywide housing plan, “Housing For All”, and applicable action items therein to generate and preserve affordable and workforce housing through community-wide participation of public and private organizations and individuals.

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

The County acknowledges that many families classified as low and moderate income, homeless, at risk of becoming homeless, or having special needs often times require assistance in accessing affordable and suitable housing, as well as social services. The County plays an active role in coordinating the delivery of these services to the identified population taking into account a needs assessment and identifying potential services in an efficient manner. The following summarizes the actions to be undertaken by Palm Beach County to enhance coordination between public housing, private housing, and social service agencies in the implementation of the FY 2024-2025 Action Plan.

Coordination with Continuum of Care

The formulation, implementation, and monitoring of 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 the community as well as the lead agency Palm Beach County Division of Human Services (DHS). 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

To increase the supply of affordable housing and identify the households with the highest need, the County will continue to coordinate with the following entities: 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. Coordination will include collaboration and strategies on housing types to be adopted, financial assistance to affordable housing projects, and the identification of groups to be prioritized. The sources of financing housing developments include the HOME and SHIP programs, as well as local funds. These are selected via competitive RFP's.

The Commission on Affordable Housing (CAH) reviews and advises on the County's Local Housing Assistance Plan (LHAP). They also propose annual allocations of SHIP funds to the LHAP strategies. The CAH conducts an annual review of County policies, procedures, ordinances, land development regulations, and makes recommendations to facilitate affordable housing.

Coordination with Health, Mental Health, and Service Provider Agencies

Coordination with the following agencies will continue: Palm Beach County Department of Health, as it relates to lead-based paint identification and abatement; 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, Vita Nova and the County's Youth Services Department to address issues related to youth and child care. Palm Beach County (PBC) Food Bank and Pathways to Prosperity to address issues related to poverty; and Healthy Mothers Healthy Babies to address issues related to health care for pregnant women.

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 disheartened areas. The County will continue to use CDBG entitlement funds to assist 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 HED will also continue to work closely with the Business Development Board to attract new businesses to the County.

CareerSource works closely with the Palm Beach County Board of County Commissioners on several innovative programs. CareerSource and the Criminal Justice Commission have developed the PREPARE Program to assist people transitioning out of incarceration and re-entering the workforce.

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Program Specific Requirements

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

Introduction:

For Fiscal Year 2024-2025, Palm Beach County expects to receive funding under the following CPD Programs: CDBG (\$6,487,957); HOME (\$2,201,524); and ESG (\$568,768). In addition, the County expects to generate \$370,000 in un-programmed program income under CDBG (\$20,000) 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, tenant based rental assistance (TBRA), 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	\$20,000
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	\$20,000

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.	2024, 2025, 2026

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 2024-2025 for the following homeownership activities: 1) provision of direct subsidy to homebuyers in the form of second mortgages to assist with the purchase of a home or construction of new housing to occupied by the homebuyer; and 2) provision of development subsidy to developers for construction, acquisition, and rehabilitation of single family housing for sale.

When providing direct subsidy to homebuyers, the assistance will be in the form of a deferred forgivable loan. When providing development subsidy to developers of homeownership housing, the assistance will be in the form of a grant or loan.

For both activities: 1) the price of the housing unit cannot exceed the lesser of fair market value or \$568,557 (95% of the median sale price for a housing unit in Palm Beach County *HUD FHA 2023 Mortgage Limits List*); 2) and, a homebuyer must have an income that does not exceed 80% of the Area Median Income (AMI) for Palm Beach County; and 3) the homebuyer must occupy the unit as their principal place of residence for no less than thirty (30) years.

Recapture Provisions

The County will impose Recapture Provisions on homebuyer units assisted through HOME direct subsidy.

Any home acquired or constructed for homeownership with direct subsidy under the HOME Program must be occupied as the principal residence of the homebuyer for an affordability period of thirty (30) years. The direct subsidy will be secured by a soft second mortgage that does not require payment of debt service. At the expiration of the affordability period, the full amount of HOME direct subsidy will be forgiven. 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 direct subsidy will be recaptured. The amount recaptured cannot exceed the net proceeds of the sale, if any. Net proceeds are defined as the sales price minus repayment of superior loans and any closing costs.

Mortgage subordinations will only be granted in cases where the homeowner is refinancing to decrease the length of the term of the first mortgage, to lower the interest rate of the first mortgage, or to make improvements to the HOME assisted property. Should the homeowner refinance for any reason other than those stated above, the full amount of the direct subsidy provided to the homeowner shall become due and payable in full. Mortgage subordinations are granted at the sole discretion of Palm Beach County.

Resale Provision

The County will impose Resale Provisions on homebuyer units assisted through HOME development subsidy.

Any home constructed, acquired, or rehabilitated with development subsidy under the HOME Program must be occupied as the principal residence of the homebuyer for an affordability period of no less than thirty (30) years. The HOME affordability requirements will be secured by recording a Declaration of Restrictions on title to the home for the length of the period of affordability. Should the homebuyer sell or otherwise transfer title to the property, the subsequent homebuyer / recipient of title must be an $\leq 80\%$ AMI household that will occupy the property as its principal residence.

The resale price will be limited to a price affordable to a range of new low-income homebuyers while providing the original homebuyer (seller) with a fair return on investment. Low-income homebuyers are defined as households with a gross annual income no greater than 80% AMI. The fair return on investment to the seller will be calculated as the sum of:

- Appreciation in value during the ownership period calculated as the difference between fair market values during the year of purchase and the year of sale as identified by Palm Beach County Property Appraiser records;
- Homeowner down payment / cash contribution to original purchase;
- Amount of mortgage principal paid down during ownership; and
- 75% of the documented value of homeowner-funded physical improvements to the property during the period of ownership, including: room and porch/deck additions; renovation of bathrooms and kitchens; replacement of HVAC system; electrical service upgrade; major re-plumbing; and installation of irrigation system.

The resale price will be set as the lesser of: 1) an amount equal to the fair return calculated per the above plus the amount necessary to repay outstanding senior debt on the property; or fair market value as determined by appraisal at time of resale;

In no instance may the resale price exceed fair market value of the property. The return to the homeowner may constitute a loss when real estate values have declined during the period of ownership.

Should the resale price calculated per the above methodology not be affordable to the new 80% AMI homebuyer, the County will provide direct financial subsidy to the homebuyer in

the form of a soft second mortgage in an amount necessary to make the purchase affordable. All such direct subsidy by the County is subject to funding availability.

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

As described above, Palm Beach County's Department of Housing and Economic Development (HED) utilizes recapture provisions for all of its HOME direct subsidy activities and utilizes resale provisions for all of its development subsidy activities. Both the recapture and resale provisions require a thirty (30) year period of affordability for all activities. Recapture provisions encumber the property via a mortgage and promissory note, while the resale provisions utilize a Declaration of Restrictions. If the owner does not maintain compliance with residency and other provisions of the encumbrance, the applicable requirements are triggered to either repay the HOME subsidy or to resell the property to another eligible homebuyer.

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 2024-2025 Palm Beach County does not plan to use HOME funds to refinance existing debt.

5. Describe eligible applicants (e.g. categories of eligible applicants, its process for soliciting and funding application or proposal (e.g. competition, first-come, first served) and where detailed information may be obtained (e.g. application packages, are the office of the jurisdiction or on the jurisdiction's website:

For FY 2024-2025, Palm Beach County will continue to undertake efforts to preserve and enhance the supply of decent and affordable housing for very-low, low-, and moderate-income households.

During FY 2024-2025, the County, through the Department of Housing and Economic Development (HED) will undertake the following: homebuyer assistance, CHDO activities, and tenant-based rental assistance. For homebuyer assistance, the County will publish a Notice of Funding Availability soliciting applications from eligible applicants among the public at large. The Notice will be published in a newspaper of general circulation and on the HED website. The Notice will be distributed directly to participating municipalities, not-for-profit partners, lenders, and other interested parties. For CHDO activities, the County will undertake a competitive Request for Proposals (RFP) process to select projects. RFPs are published in a newspaper of general circulation, posted on the HED website, and distributed directly to a list of over 250 known interested parties. The Board of County Commissioners retains the authority to designate subrecipients and developers. The County's Department of Community Services will administer and oversee the tenant-based rental assistance (TBRA) program and will utilize an application process to determine client eligibility. Community Services will notify the Continuum of Care, the Homeless and Housing Alliance, community partners, and all other

interested parties of the availability of funds via public notices, posting on website, and email distribution.

6. Indicate if the County plans to limit the beneficiaries or give preferences to a segment of the low-income population:

Palm Beach County's HOME Program is open to all eligible individuals and households that have incomes less than 80% of the Area Median Income for the County. The County does not place limitations on particular categories of eligible beneficiaries, and does not plan to give preferences to particular categories of eligible beneficiaries.

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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 (HMIS) 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 HMIS 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 SPADAT as its consolidated and coordinated evaluation instrument. Training on how to use the tool began in January 2014 and continues on a semi-annual basis. Any additional training on the usage of the SPADAT including any updates is conducted on an as needed basis. These trainings are offered free of charge and is open to all HHA member agencies. 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) implements 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 upcoming fiscal year.

For FY 2024-2025, the priorities remained consistent with last fiscal year's priorities. Since the priorities remained unchanged, the HHA Governance Board opted to recommend ESG funding to the current FY 23 ESG subrecipients provided that the agencies and activities were deemed to be

in good standing. To that end, county staff reviewed each ESG subrecipient and ESG- funded activity to ensure:

- a HHA ESG priority was met;
- all ESG and county regulatory requirements were met;
- contractually goals and expenditures rates were met;
- participation in HMIS; and
- latest monitoring report for the ESG activity noted no findings or concerns.

All ESG subrecipients and ESG-funded activities were found to be in good standing. The proposed ESG funding recommendations were brought before the full HHA Committee for ratification and then the recommendations were forwarded to the Board of County Commissioners (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 18-25 with similar life experiences are provided three seats on the HHA Governance Board. The HHA recognizes that people who have been most affected by a lack of a permanent home are experts on the challenges and solutions that surround homelessness. The Governance Board members who have lived experience participate in the approval of all ESG funding priorities and ESG funding recommendations.

5. Describe performance standards for evaluating ESG.

All ESG-funded subrecipients enter into a one-year agreement with PBC to provide ESG-funded homeless activities. The scope of work depicted in the agreement outlines the reimbursement and reporting submission process and requirements for each subrecipient. All ESG agreements 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. Reimbursement claims will not be processed until all reporting criteria are satisfied successfully.

ESG subrecipients must keep all financial records relevant to ESG grant costs and expenses of all cost of materials, supplies, services, and any other eligible costs and expenses for which reimbursement is sought. Following the filing of the final expenditure report, all records relevant to the grant are kept for at least five (5) years. Any records relevant to the ESG-funded activity must be made available to the County immediately, if requested.

The HHA has implemented performance measures for evaluating ESG-funded projects. County staff is currently utilizing these performance standards and HMIS data to evaluate ESG-funded activities.

6. Emergency Solutions Funding Recommendations

The following table shows the FY 2024-2025 ESG funding recommendations made by the HHA Governance Board. In addition to these recommendations, \$75,000 was set aside for the operational costs of the County's HMIS and \$11,375 was allocated for program administration.

FY 2024-2025 EMERGENCY SOLUTIONS GRANT FUNDING RECOMMENDATIONS

Agency	Beneficiaries (Individuals)				
	Emergency Shelter (ES)	Rapid Re-housing (RRH)	ES	RRH	TOTAL
Aid to Victims of Domestic Abuse	\$159,190		144		144
Salvation Army	\$72,359		44		44
YWCA	\$57,887		190		190
Adopt A Family		\$192,957		70	70
TOTAL	\$482,393	\$192,957	378		448

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

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

05/07/2024

4. Applicant Identifier:

B-24-UC-12-0004

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Palm Beach County Board of County Commissioners

* b. Employer/Taxpayer Identification Number (EIN/TIN):

59-6000785

* c. UEI:

XL2DNFMPCR44

d. Address:

* Street1:

100 Australian Avenue

Street2:

Suite 500

* City:

West Palm Beach

County/Parish:

Palm Beach

* State:

FL: Florida

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

33406-1485

e. Organizational Unit:

Department Name:

Housing & Economic Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

Jonathan

Middle Name:

B

* Last Name:

Brown

Suffix:

Title: Director

Organizational Affiliation:

* Telephone Number:

561-233-3602

Fax Number:

561-233-3651

* Email:

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:

14-218

CFDA Title:

Community Development Block Grant

* 12. Funding Opportunity Number:

B-24-UC-12-0004

* Title:

Community Development Block Grant (CDBG)

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Palm Beach County's CDBG Program includes code enforcement, public facilities and infrastructure, public services, economic development, 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: 10/01/2024	* b. End Date: 09/30/2025
18. Estimated Funding (\$):	
* a. Federal	\$6,487,957.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	\$20,000.00
* g. TOTAL	\$6,507,957.00
* 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 08/15/2024 ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review. ☐ c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
☐ Yes ☒ No If "Yes", provide explanation and attach 	
Add Attachment Delete Attachment View Attachment	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) ☒ ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: Mr.	* First Name: Jonathan
Middle Name: B	
* Last Name: Brown	
Suffix: 	
* Title: Director	
* Telephone Number: 561-233-3602	Fax Number: 561-233-3651
* Email: jbrown2@pbcgov.org	
* Signature of Authorized Representative: Jonathan Brown	* Date Signed: 8/9/2024

Approved as to Form
and Legal Sufficiency
By: Howard J. Falcon III
Howard J. Falcon III
Chief Assistant County Attorney

Approved as to Terms and Conditions
Dept. of Housing and Economic
Development
By: Sherry Howard
Sherry Howard

CDBG

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.

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Prescribed by OMB Circular A-102

CDBG

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 Palm Beach County	DATE SUBMITTED 7/24/2024

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

CDBG

OMB Number: 4040-0007
Expiration Date: 02/28/2025

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

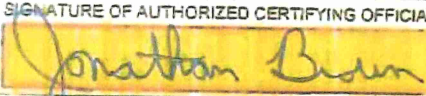
NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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 cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. 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.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for 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).
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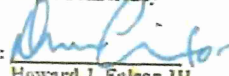
CDBG

9. 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.
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12. Will comply with the Wild and Scenic Rivers Act of 1966 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
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14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. 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.
17. 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."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 105(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.

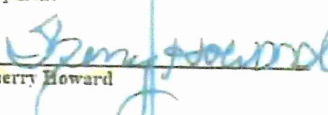
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Palm Beach County	DATE SUBMITTED 7/29/2014

Standard Form 424B (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

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) 2024, 2025, 2026 [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.

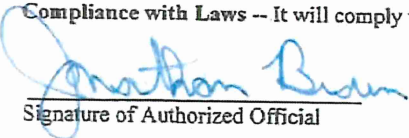
Excessive Force — It has adopted and is enforcing:

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.

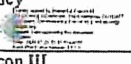
Compliance with Laws -- It will comply with applicable laws.


Signature of Authorized Official

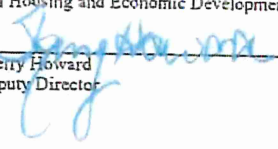
7/25/2024
Date

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

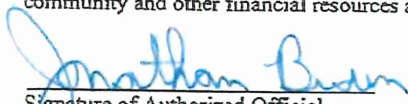
Approved as to Terms and Conditions
Dept. of Housing and Economic Development

By: 
Sherry Howard
Deputy Director

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.


Signature of Authorized Official

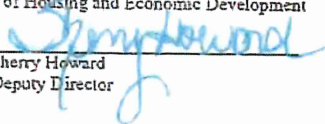
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Director, Palm Beach County Department of Housing and Economic Development
Title

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

Application for Federal Assistance SF-424		
* 1 Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application		
* 2 Type of Application: ☒ New ☐ Continuation ☐ Revision		
* If Revision, select appropriate letter(s): * Other (Specify): 		
* 3. Date Received: 05/07/2024		4. Applicant Identifier: M-24-UC-12-0215
5a. Federal Entity Identifier: 		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State: 		7. State Application Identifier:
B. APPLICANT INFORMATION:		
* a. Legal Name: Palm Beach County Board of County Commissioners		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 59-6000785		* c. UEI: XL2DNFMPCR44
d. Address:		
* Street1: 100 Australian Avenue		
Street2: Suite 500		
* City: West Palm Beach		
County/Parish: Palm Beach		
* State: FL: Florida		
Province:		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 33406-1485		
e. Organizational Unit:		
Department Name: Housing & Economic Development		Division Name:
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. * First Name: Jonathan		
Middle Name: B		
* Last Name: Brown		
Suffix:		
Title: Director		
Organizational Affiliation: 		
* Telephone Number: 561-233-3602		Fax Number: 561-233-3651
* Email: 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:

14-239

CFDA Title:

* 12. Funding Opportunity Number:

M-24-UC-12-0215

* Title:

HOME Investment Partnership

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 home-buyers, community development housing organizations, and program administration.

Attach supporting documents as specified in agency instructions.

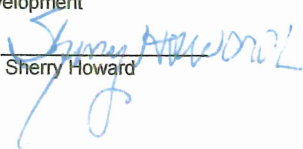
Add Attachments

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	
17. Proposed Project:	
* a. Start Date: 10/01/2024	* b. End Date: 09/30/2025
18. Estimated Funding (\$):	
* a. Federal	\$2,201,524.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	\$2,201,524.00
* 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 08/15/2024 ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review. ☐ c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
☐ Yes ☒ No If "Yes", provide explanation and attach Add Attachment Delete Attachment View Attachment	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) ☒ ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: Mr.	* First Name: Jonathan
Middle Name: B	
* Last Name: Brown	
Suffix: 	
* Title: Director	
* Telephone Number: 561-233-3602	Fax Number: 561-233-3651
* Email: jbrown2@pbcbgov.org	
* Signature of Authorized Representative: 	* Date Signed: 8/19/2024

Approved as to Form
and Legal Sufficiency
By: **Howard J. Falcon III**
Howard J. Falcon III
Chief Assistant County Attorney

Approved as to Terms and Conditions
Dept. of Housing and Economic
Development
By: 
Sherry Howard

HOME

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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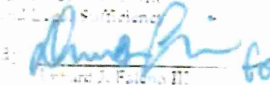
Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

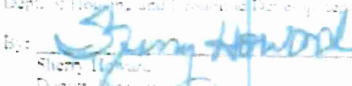
HOME

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Fauquier County	DATE SUBMITTED 7/25/2024

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

Approved: 
Jonathan Brown
County Administrator

Approved: 
Sherry Howard
Deputy Director

HOME

OMB Number: 4040-0007
Expiration Date: 02/28/2025

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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 (0348-0040), Washington, DC 20503.
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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 cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. 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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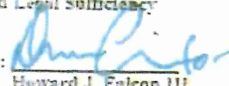
HOME

1. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276e-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.
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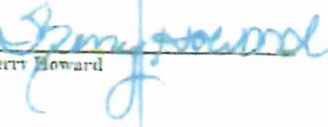
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Director	
APPLICANT ORGANIZATION		DATE SUBMITTED	
Palm Beach County		7/29/2024	

Standard Form 424B (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

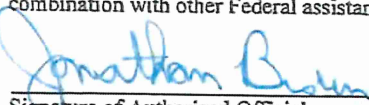
Specific HOME Certifications

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.

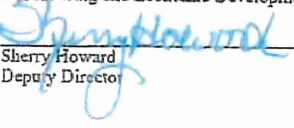
Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature of Authorized Official

7/25/2024
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

Application for Federal Assistance SF-424		
* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application		* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision * If Revision, select appropriate letter(s): * Other (Specify):
* 3. Date Received: 05/07/2024		4. Applicant Identifier: E-24-UC-12-0004
5a. Federal Entity Identifier: 		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State: 		7. State Application Identifier:
B. APPLICANT INFORMATION:		
* a. Legal Name: Palm Beach County Board of County Commissioners		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 59-6000785		* c. UEI: XL2DNFMPCR44
d. Address:		
* Street1: 100 Australian Avenue		
Street2: Suite 500		
* City: West Palm Beach		
County/Parish: Palm Beach		
* State: FL: Florida		
Province:		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 33406-1485		
e. Organizational Unit:		
Department Name: Housing & Economic Development		Division Name:
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.		* First Name: Jonathan
Middle Name: B		
* Last Name: Brown		
Suffix:		
Title: Director		
Organizational Affiliation: 		
* Telephone Number: 561-233-3602		Fax Number: 561-233-3651
* Email: 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:

E-24-UC-12-004

* Title:

Emergency Solutions Grant

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 becoming homeless through support of 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
17. Proposed Project:	
* a. Start Date: 10/01/2024	* b. End Date: 09/30/2025
18. Estimated Funding (\$):	
* a. Federal	\$568,768.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	\$568,768.00
* 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 08/15/2024 ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review. ☐ c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
☐ Yes ☒ No If "Yes", provide explanation and attach:	
	Add Attachment Delete Attachment View Attachment
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) ☒ ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: Mr.	* First Name: Jonathan
Middle Name: B	
* Last Name: Brown	
Suffix: 	
* Title: Director	
* Telephone Number: 561-233-3602	Fax Number: 561-233-3651
* Email: jbrown2@pbcgov.org	
* Signature of Authorized Representative: 	* Date Signed: 8/19/2024

Approved as to Form
and Legal Sufficiency
By: Howard J. Falcon III
Howard J. Falcon III
Chief Assistant County Attorney

Approved as to Terms and Conditions
Dept. of Housing and Economic
Development
By: Sherry Howard
Sherry Howard

ESG

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.

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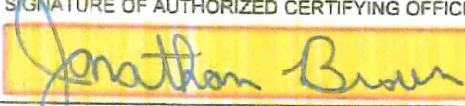
NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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).
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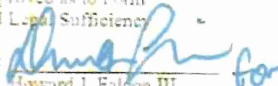
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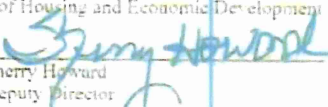
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Palm Beach County	DATE SUBMITTED 7/29/2024

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

ESG

OMB Number: 4040-0007
Expiration Date: 02/28/2025

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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 (0348-0040), Washington, DC 20503.
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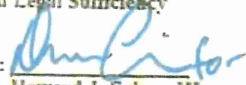
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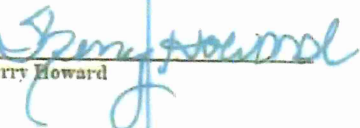
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Palm Beach County	DATE SUBMITTED 7/29/2014

Standard Form 424B (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

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.

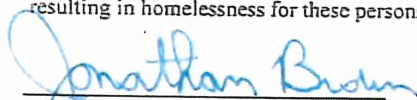
Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

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.

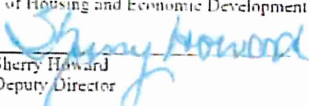
Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other 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

7/25/2024
Date

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

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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.

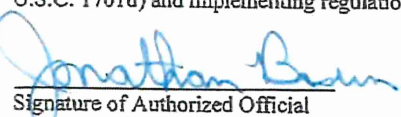
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

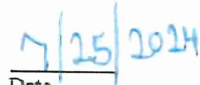
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the 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.

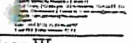
Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

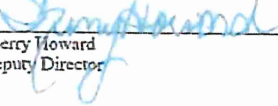

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APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

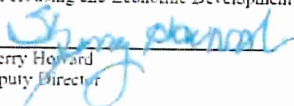
Lobbying Certification

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.

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APPENDIX B – Citizen Participation Comments

The following is a summary of meetings held by the Department of Housing and Economic Development (DHED), Community Services Department, and the Palm Beach County Board of County Commissioners (BCC) as it relates to the development and approval of the FY 2024-2025 Action Plan.

Action Plan Preparation Meeting

Date: Wednesday, March 13, 2024
Time: 10:00 A.M.
Location: 100 Australian Avenue, 5th Floor Training Room, West Palm Beach, FL 33406 (in-person and via WebEx)

Purpose of Meeting:

This meeting was held to inform the public of the preparation of the Action Plan for FY 2024-2025, as well as to seek their input in 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:

The pandemic has increased the demand for domestic violence services. The population of homeless persons has increased.

Palm Beach County Board of County Commissioners Workshop

Date: April 16, 2024
Time: 9:30 A.M.
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 2024-2025 Action Plan and to receive direction from the Board of County Commissioners (Board) on these strategies.

DHED staff utilized a power point presentation to convey information to the Board and 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, as well as the recommended uses for the funds under the three programs.

Board Discussion:

Various topics were discussed at the workshop to include providing and maintaining affordable housing, addressing persons who are homeless or at risk for homelessness, and addressing substance abuse concerns in the community.

Summary of Public Comments:

Affordable rental units remain a great concern for the residents of Palm Beach County, as the housing crisis continues to pose a threat to their sense of security.

Board Direction:

After the 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.

Action Plan Public Meeting

Date: June 12, 2024

Time: 10:00 am

Location: 100 Australian Avenue, 5th Floor Training Room, West Palm Beach, FL 33406 (in-person and via WebEx)

The purpose of the meeting is to present the FY 2024-2025 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:

No comments were received during the meeting.

Palm Beach County Board of County Commissioners Public Hearing

Date: Tuesday July 2, 2024

Time: Not 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 2024-2025 Action Plan to the Board of County Commissioners for approval.

Summary of Public Comments:

No comments were received during the meeting.

Board Direction:

Approved Action Plan for Submission to HUD.

HEDComments1@pbc.gov (e-mail)

No comments have been submitted for consideration.

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 2024-2025 HOME allocation is \$2,201,524. 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 2024-2025, the required match of \$467,939 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*: \$220,000 representing 10% of the total allocation;
- *Community Housing Development Organization (CHDO) Set-Aside Program*: \$330,229 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*: \$109,771 representing 5% of the overall HOME Program allocation;
- *Tenant Based Rental Assistance*: \$500,000 in HOME Program funding will be allocated for homeless prevention/intervention and will be carried out by Palm Beach County's Community Services Department.
- *First Time Homebuyer Program*: \$1,041,524 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 63 households will benefit from affordable rental/homeownership housing units to be implemented under the HOME Program for FY 2024-2025.

Activity	Funding	# of Units /Households Assisted
Program Administration and Planning	\$220,000	n/a
CHDO Set-Aside Program	\$330,229	2 units
CHDO Set-Aside Program Operating Expenses	\$109,771	n/a
Tenant Based Rental Assistance	\$500,000	50 households
First Time Homebuyer	\$1,041,524	11 households
Total	\$2,201,524	63

Matching Contributions

The minimum 25% match contribution is required only for certain HOME activities. Based on the County's HOME allocation for FY 2024-2025, the match requirement totals \$467,939. Palm Beach County provides its match requirement from the SHIP program and from County resources.

Proposed HOME Projects

For FY 2024-2025, HED will undertake the following: Tenant Based Rental Assistance, 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
Tenant Based Rental Assistance (TBRA)	Funding allocated for homeless prevention/intervention; to be administered and overseen by PBC Community Services Department.	Homeless Prevention; 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.

Timetable	Goal for Minority Participation in each Trade	Goals for Female Participation in each Trade
	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-six (56) current loans. At this time, approximately \$14,147,331 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 from 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 Development; 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 responses 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- Annual Report (2023)

The following summarizes the recommendations made by the CAH in 2023.

- The County should continue current efforts towards expediting development approvals and building permits for affordable housing projects. Offer expedited approvals for all projects ≥65% affordable/workforce. Designate an individual to shepherd applications through approval process. Utilize external entities to conduct review.
- The County should provide transparent fee structure and clear directions to public. Offer reduction in fees for affordable/workforce housing and/or defer collection of fees. Require municipal fee reduction for SHIP projects.
- The County should address restrictions to allow for greater opportunity, including requirements for electrical feed from main home and covenant to remove ADU kitchen. Do not count ADUs as separate housing unit in density calculations.
- The County should continue to base street and related requirements for affordable housing on sound engineering practices.
- The County should consider adoption of a comprehensive countywide housing plan for workforce and affordable housing, including a plan of action to take advantage of opportunities presented by the Live Local Act.
- The County should make available online a regularly-updated inventory of all County-owned properties, and offer a clear process for disposition so private industry and not-for-profit organizations can utilize available lands for the development of affordable/workforce housing.
- "Flexible Zoning". The County should consider adoption of alternative PDRs community-wide, including an approval process designed to develop a flexible self-regulating development order.

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 2022 which was tabulated and published by the Shimberg Center for Housing Studies, a total of 33,847 home purchase loans were originated in Palm Beach County of which 37,665 was for purchase, improvement, or refinancing of a single-family home. Loans for purchase of single-family homes accounted for 80.0% of all loans related to these types of residences. Home purchase loans between \$200,000 and \$700,000 made up 56.0% of all home purchase loans.

This range encompasses the average price of a single-family home in Palm Beach County as December 2022 of \$570,000.

Of the 33,687 home purchase loans originated, 14,171 (42%) were denied. White Americans accounted for 71.0% of all home purchase loans originated of which 38.0% were denied. Nearly 50% 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 (17%); collateral (5%); incomplete credit application (5%); credit history (9%).

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.

% of Persons by Race	% of Persons with a High School Diploma	% of Persons with a Bachelors or Higher Degree
% Population (25+ years)	88.1	34.8
% White Alone (25+ years)	90.5	37.9
% White Alone – Non-Hispanic or Latino (25+ years)	95.0	41.8

% Black Along (25+ years)	78.3	18.4
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Palm Beach County School Board operates 163 schools that 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 schools 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 the 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 of 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.

Item to be addressed	Measures to be taken	Responsible Entity
Increase people’s awareness of their fair housing rights and about	• Increase outreach through media blast (radio and television ads,	• Primarily OEO • FHC (website and presentations)

how to recognize a violation and how to file a report.	postings on website, strategic presentations).	• Legal Aid (website and presentations)
Intensify efforts to identify and prosecute fair housing violators	• Increased testing and prosecutions.	• OEO • FHC • Legal Aid
Apprise landlords, realtors, lenders and county/municipal personnel about fair housing.	• Undertake training sessions and presentations.	• Coordinated by OEO
Ensure that current and future changes to the county's Building and zoning regulations do not unintentionally promote fair housing violations.	• Review of current ordinances and regulations as well as the policies governing all count supported or initiated affordable housing programs	• PBC- PZ&B
Ensure that financial institutions do not discriminate in their lending policies.	• Conduct testing	• FHC

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APPENDIX F – PBC Homeless and Housing Alliance ESG Standards



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 1st and is good through January 31st, but the participant does not move in until April 1st, then the initial Rental Agreement or Occupancy Agreement should only be good through January 31st, 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

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 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 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.

Client Signature

Date



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



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INTRODUCTION

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

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

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

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

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				
VI - SPDAT		LoH (Current Episode) *tie breaker		
Score	Acuity	Min	Max	Acuity
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			
		Special Population		
		Identified	Acuity	
		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		
RRH Chronicity Document Ready		RRH Homeless Document Ready		
Description	Acuity	Description	Acuity	
No	0	No	0	
Yes	10	Yes	10	
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			

Individual PSH Acuity Scoring Legend		
VI - SPDAT		LoH (Current Episode)
Score	Acuity	Min Max Acuity
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	
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	

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

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				
TAY VI – SPDAT (Must score 24+ on Y-SPDAT for PSH)		LoH (Current Episode)		
Score	Acuity	Min	Max	Acuity
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			
Exposure to Violence Home/Community		Chronic Mental Illness		
Description	Acuity	Identified	Acuity	
No	0	N/A	0	
Yes	3	Yes, with Treatment	2	
		Yes, no Treatment	5	
		Chronic Health (Medical) Issues		
		Description	Acuity	
		None	0	
		Yes, with Treatment	2	
		Yes, no Treatment	5	
		Special Population		
		Description	Acuity	
		Identify as LGBTQ+, Gender Identity or Sexual Orientation	1	
		Identify as Person of Color	1	
		Experience Human Trafficking	1	

****FOR PSH: If scores are the same, case conferencing will be done with HHA partners to make decision of who is placed****

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
(LoH Acuity(*3)) + (VI-F-SPDAT Acuity(*2)) + SP = Acuity Score		

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.

Family RRH Levels			
Level	Case Length	Services	Acuity Level
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.

Family PSH 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

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

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

Weighted Criteria	
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)

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

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

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

Programs & Characteristics	Transitional Housing	Permanent Supportive Housing	Other Permanent Housing
Length of Stay	Maximum stay 24 months	No time limit	No time limit
Occupancy Agreement or Lease	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
Service Requirements	Services are required	Services are optional	Services are optional
Eligibility	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

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

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

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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)
Level 1-- The household will need minimal assistance to obtain and retain housing. The Rapid Re-Housing (RRH) program offers the following for most Level 1 households: ❖ Initial consultation related to housing search (e.g. where to find rental information, how to complete housing applications, documentation needed) ❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.) ❖ Time-limited rental assistance, per client Housing Plan ❖ Home visit/check-in after move-in ❖ Offer services (at tenant request) for up to 3 months (100% first, last, security) 2nd-75% subsidy 3rd -50% subsidy Landlord assistance will likely include only program contact information for tenancy concerns	Household has no criminal history Rental history: an established local rental history. No evictions, landlord references are fair to good. Credit history is good, with the exception of a few late utility and credit payments	No significant barriers except financial: very low income, insufficient emergency reserves
Level 2— The household will need routine assistance to obtain and retain housing. The RRH program offers the following for most Level 2 households:	Household has no serious criminal history but may have a few offenses such as moving violations, a DUI, or a misdemeanor. 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.	Financial barriers include low to very low income, may have inconsistent employment, and/or poor budgeting skills. No serious mental illness or chemical dependency that affects housing retention. May have some level of depression/anxiety or problems responding to conflict.

Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
❖ Initial consultation and ongoing assistance with housing search including transportation assistance as needed ❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.) ❖ Time-limited rental assistance, per client Housing plan ❖ Development of Housing Plan to work on any identified retention barriers ❖ Bi-weekly home visits for the first three months; then reduce to monthly as most Housing Plan goals are met. ❖ Services available for up to 6 months, depending on housing challenges and progress toward Housing Plan goals. (100%- First, last & security) 2nd – 100% 3rd – 75% 4th – 50% 5th – 25% 6th – 25% Landlord assistance: ❖ 6 months availability: landlord can call with tenancy issues and program will respond. ❖ Program will check in with landlord periodically for updates.	Credit history shows pattern of late or missed payments.	May lack awareness of landlord-tenant rights/responsibilities. May have minor problems meeting basic household care/cleaning May have been homeless once before.

Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
Level 3 – The household will need more intensive and/or longer assistance to obtain and retain housing. The RRH program offers the following for most Level 3 households: ❖ Initial consultation and ongoing assistance with housing search. Staff may accompany client to the landlord interview. ❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.) ❖ Time-limited rental assistance, per client Housing Plan ❖ Development of Housing Plan to work on any identified retention barriers ❖ 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. ❖ Services available for up to 9 months, depending on housing challenges and progress toward Housing Plan goals. (100% first, last, security) 2nd – 100% 3rd – 100% 4th – 75% 5th – 75% 6th – 50% 7th – 50% 8th – 25% 9th – 25%	Household may have some criminal history, but none involving drugs or serious crimes against persons or property. 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. Credit history includes late payments and possible court judgments for debt, closed accounts.	May have deficits in care of apartment, landlord-tenant rights/responsibilities, communication skills with landlord and/or other tenants Conflict may exist in household. May have lost housing and been homeless several times in the past.

Palm Beach County Rapid Re-Housing Program Standards

Level of Assistance	Tenant Screening Barriers (Barriers to Obtaining Housing)	Retention Barriers (Barriers to Sustaining Housing)
Level 3 – (cont'd) Landlord assistance: ❖ 9 month availability; landlord can call with tenancy issues and program will respond even after services end. ❖ Program will check in with landlord periodically for updates.		
Level 4— The household will need more intensive and longer assistance to obtain and retain housing. The RRH program offers the following for most Level 4 households: ❖ Initial consultation and ongoing assistance with housing search. Staff may accompany client to the landlord interview. ❖ Financial assistance for housing start-up (e.g. first month's rent, security deposit, utility deposit.) ❖ Time-limited rental assistance, per client Housing Plan ❖ Development of Housing Plan to work on any identified retention barriers ❖ 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. ❖ Services available for up to	Criminal history, violations may include drug offense or crime against person or property 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. Credit history is poor, late payments, may include judgment for debt to landlord, closed accounts	Extremely low income, no emergency reserves, bank account closed, lacks budgeting skills. 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 Has likely been homeless multiple times or for more extended periods

Palm Beach County Rapid Re-Housing Program Standards

12 months, depending on housing challenges and progress toward Housing Plan goals. (100% First, last, security) 2nd – 100% 3rd – 100% 4th – 75% 5th – 75% 6th – 75% 7th – 50% 8th – 50% 9th – 50% 10th – 25% 11th – 25% 12th – 25% Landlord assistance: ❖ 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. ❖ Program will check in with landlord monthly (or more often if landlord prefers) for updates/issues. ❖ May pay an additional damage deposit and/or last month's rent in addition to normal start-up costs.		
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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)
Level 5— 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. ❖ Weekly home visits until PSH is arranged or a determination is made regarding maintaining RRH. Case Management requirements would then mirror Level 4's. • (Hold until PSH is available) • First, security (month to month lease) • 30% of adjusted gross income in preparation for PSH • Financial assets – Month 2 difference between 30% cost of rent.	Extensive criminal background Extremely poor rental history, multiple evictions, serious damage to apartment, complaints. Credit history includes multiple judgments, unpaid debts to landlords, closed accounts.	Active and serious chemical dependency or mental illness Unable to comply with lease requirements or interact positively with landlord/tenants; poor apartment management skills, out-of-control behaviors by adults or children May have experienced chronic homelessness (multiple and/or extended periods of homelessness)

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 began 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).

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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.

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.

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**Palm Beach County
Board of County Commissioners**



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