

**DRAFT COPY FOR PUBLIC REVIEW AND
COMMENT DEC.1 -15, 2022**

**POLK COUNTY
Board of County Commissioners
Health and Human Services
HOUSING AND NEIGHBORHOOD
DEVELOPMENT OFFICE**



Florida's Crossroads of Opportunity

FY 2021-2022 CAPER

Consolidated Annual Performance & Evaluation Report

Community Development Block Grant Year 43

Emergency Shelter Grant Year 27

HOME Investment Partnerships Program Year 27

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Contents

CR-05 - Goals and Outcomes.....	3
CR-10 - Racial and Ethnic composition of families assisted.....	7
CR-15 - Resources and Investments 91.520(a).....	8
CR-20 - Affordable Housing 91.520(b).....	15
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c).....	18
CR-30 - Public Housing 91.220(h); 91.320(j).....	21
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j).....	22
Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a).....	24
Impediment # 1. Need for education and outreach;.....	24
Impediment # 2. Need for coordination between area agencies, local governments, and local housing authorities;	24
Impediment # 3. Need for rental subsidy and financing mechanisms to assist low to moderate- income homebuyers and renters;	24
b. Continue to receive and update fair housing information flyers from Florida Commission on Human Relations.....	25
CR-40 - Monitoring 91.220 and 91.230	26
CR-45 - CDBG 91.520(c)	27
CR-50 - HOME 91.520(d)	28
CR-60 - ESG 91.520(g) (ESG Recipients only)	30
CR-65 - Persons Assisted – This section Reported in the SAGE System See SAGE Report Attachment .	32
CR-75 – Expenditures	33

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During the October 1, 2021, to September 30, 2022, Action Plan year, three Consolidated Plan Goals were addressed. The first goal addressed was Affordable Housing which was met by completing emergency repairs to owner-occupied low-income housing units, providing substantial repairs which may include reconstruction of the unit, and by using CDBG funds to support the Case Management for the provision of Tenant-Based Rental Assistance (TBRA) for elderly and disabled clients. The second AP 2021 goal addressed was providing for a Suitable Living Environment/Quality of Life. This goal was met in 2021 by completing needed infrastructure improvements in various target areas in the low-income communities in Polk County. Our current Municipal Partners completed projects that address infrastructure and public facilities improvements this year. This goal is also met by reducing blighting influences on a spot basis countywide. The third goal addressed was expanding the Economic Opportunity/Self Sufficiency. Public Services dollars were expended on programs through our subrecipients to provide job skills training and promote employment opportunities for low-income residents. From April to May of 2020 CDBG-CV1 funds were used to assist with rent and mortgage payments for residents that had layoffs, were quarantined, had reduced work hours, or were otherwise affected by the Coronavirus. The program assisted eighty-two (82) clients before it was put on hold in order to expend funds for the same assistance with CARES Act funds in the amount of \$126 million allocated to Polk County.

~~On August 5th of last year, Polk County received \$3.4 million provided by the Florida Housing Finance Corporation (FHFC). The federal government passed through CARES Act Funds to the State of Florida, which in turn passed funds to Polk County government which had to be expended by December 30, 2020. HND assisted seven hundred and twenty five client (725) with these funds.~~

The expenditures for the CDBG-CV1 funds are detailed on the PR-26 Financial Summary Report for CDBG-CV funds attached in the reports section of this Consolidated Annual Performance and Evaluation Report (CAPER). Last year the County took applications for rent and mortgage assistance. The program was funded with CDBG-CV1 and CBGCV3 funds for a total of \$2.5 million.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$	Homeowner Housing Added	Household Housing Unit	10	0	120.00%	2	0	28.57%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	85.00%	20	0	43.75%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	250	1	0.40%	50	1	2.00%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$	Homelessness Prevention	Persons Assisted	285	0	5.64%	24	94	100%

Expanding Economic Opportunities/Self Sufficiency	Non-Housing Community Development	CDBG: \$ / ESG: \$287967	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1550	1880	121.29%	1550	1880	121.29%
Suitable Living Environment/Quality of Life	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12560	1520	12.10%	26680	1520	5.70%
Suitable Living Environment/Quality of Life	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	250	0	00.00%	0	0	0%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Polk County CDBG funds were expended this year to address the highest priority needs activities that were indicated by survey results during the five-year planning process. Additional input was gained during the 2021-2022 Action Plan planning process when the Polk County Housing and Neighborhood Development Office coordinated with various private and nonprofit agencies. These agencies whose missions are to assist in the provision of housing and social services, including mental health providers offer input as to the local priority needs of our low-income residents. These agencies focus their efforts on very low-, low- and moderate-income people. Additional consultations were conducted over the phone, through emails, and during one-on-one meetings with various agencies. During the 2021-2022 planning cycle Housing and Neighborhood Development staff attended various meetings to facilitate neighborhood planning for the Florence Villa/Boggy Bottom area, and the Wahneta Neighborhood of Polk County. Staff reviewed the planning process with Inwood Neighborhood representatives as well at the first public meeting this year. Staff members continue to support Neighborhoods by attending scheduled meetings for input as to how federal funds may assist with redevelopment, homeowner rehabilitation, and infrastructure improvements.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	ESG
White	5,300	12	0
Black or African American	3,461	20	0
Asian	26	0	0
American Indian or American Native	15	0	0
Native Hawaiian or Other Pacific Islander	2	0	0
Total	8,804	32	0
Hispanic	1,316	1	0
Not Hispanic	7,488	21	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The activities carried out in the fiscal year 2021-2022 were consistent with the objectives of the County's current Consolidated Plan. This is the first year of a Five-Year Plan that began in 2021 and will conclude in 2025. Funds were used to provide housing and non-housing programs. With the CDBG, HOME, and ESG funds available the Polk County Housing and Neighborhood Development office was able to offer consistent services as described in the FY 2021-2022 Action Plan.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year with Administration Funds
CDBG	public - federal	\$ 4,358,293	\$ 4,656,558.77
HOME	public - federal	\$ 1,508,682	\$ 1,439,360.11
ESG	public - federal	\$ 326,536	\$ 282,931.50
Other	public - state	\$ 5,105,519	\$ 1,782,349.23

Table 3 - Resources Made Available

Narrative

Polk County receives yearly entitlement funds from CDBG, HOME, and ESG federal sources. Phased projects may overlap funding years. Expenditures are tracked by year internally and reported in the IDIS system. The expended amounts shown in the table above include administrative funds expended during this program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Bartow	3%	5%	Gordon Heights Park Improvement
Countywide	68%	51%	Polk County CDBG target areas and municipal partner cities
Wahneta Community	28%	21%	Drainage and road improvements

Table 4 – Identify the geographic distribution and location of investments

Narrative

The following is the breakdown of the amount expended from October 1, 2020, to September 30, 2021. The Wahneta Infrastructure project expended \$ 773,689.50 which included Rifle Range Road drainage improvements of \$116,809.74. Polk County's Municipal Partners expended \$295,894.93.

The CDBG Minor Repair and Reconstruction Program completed \$206,569.23 in expenditures during this program year. CDBG Public Services Subrecipients completed \$467,179.23 in draws for this year's activities. The CDBG funded HOME program administration funds were expended in the amount of \$51,128.44. The Gordon Heights Park improvement project was completed for \$186,567.20. Gospel Inc. finalized a land acquisition project in the amount of \$1,000,000 phased over a two-year period. This land acquisition project is part of a permanent supportive housing project for the homeless.

Leveraging

Explain how federal funds leveraged additional resources (private, state, and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

HOME matching funds are derived from Polk County's Impact Fee waiver program. Impact fees are waived for single-family and multi-family units that are for residents 80% and below of the Area Median Income (AMI).

Polk County maintains an inventory of publicly owned land suitable for affordable housing development. The Polk County Housing and Neighborhood Development Office assesses the available lots and offers them through a Request for Application (RFA) process to assist potential developers to build affordable housing units. Additional funds are provided for the down payment and closing costs assistance through the State Housing Initiatives Partnership (SHIP) program. These affordable housing units qualify for Polk County's Affordable Housing Impact Fee Waiver program.

2020 – 2021 Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$ 3,438,241.00
2. Match contributed during current Federal fiscal year 2020-2021	\$ 1, 854,997.00
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$ 5,293,238.00
4. Match liability for current Federal fiscal year	\$ 128,477.44
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 5,164,760.56

Table 5 – Fiscal Year Summary - HOME Match Report

3574 Lazy Lake Dr. N, Lakeland, FL 33801	08/29/22	0	\$ 11,625.00	0	0	0	0	\$ 11,625.00
0 7th Street, Lakeland, FL 33805	08/29/22	0	\$ 10,474.00	0	0	0	0	\$ 10,474.00
Total			\$ 1,053,595.00					\$ 1,053,595.00

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$31,991.93	\$132,442.00	\$72,776.59	0	\$91,657.34

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0			
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	115	0
Number of Non-Homeless households to be provided affordable housing units	87	0
Number of Special-Needs households to be provided affordable housing units	50	0
Total	252	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	50	51
Number of households supported through The Production of New Units	2	0
Number of households supported through Rehab of Existing Units	20	0
Number of households supported through Acquisition of Existing Units	0	0
Total	72	0

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

From October 1, 2021, to February 2022 the Housing & Neighborhood Development Office (HND) workflow was consistent. Continuing from March of last year the virus’s local impacts and consequences began to affect the progress of projects slated for assistance. Polk County HND Rehabilitation staff worked through supply chain shortages which caused long waiting periods for windows, trusses, electrical panels etc. This year supply chain issues continued to impact on the cost and timelines for activity completion. Rehabilitation staff continued to see a lag in contractors available to complete projects producing a slowdown in repairs for our clients’ projects. Using CDBG funds, one (1) client was assisted with minor repair projects. A roof replacement and minor home repairs were completed. The original goal was sixteen (16) and was not met because of the COVID-19 reduction in available contractors due to quarantine, office shutdowns, and work slowdowns.

Using HOME funds in FY 2021-2022 six (6) single-family reconstruction activities were completed using this program year using funds from FYs 2018, 2019, and 2020. The original goal was to complete five (5) projects during the 2021-2022 Action Plan year. CDBG funds were planned for two reconstruction projects they are not complete as of the end of this reporting period.

Last year the CDBG Minor Repair Sewer Connection activity had a goal of fifteen (15) clients to be served. Many clients had difficulty with confirming property ownership due to the inherited property not being probated, some properties had multiple siblings on the deed who refused to sign off on the sewer connection documents. Many potential clients did not want to supply the required income documents for the file. Several people that contacted HND were renters and did not own the unit.

From October 1, 2021, through September 30, 2022, the number of households supported through Rental Assistance in the Tenant-Based Rental Assistance Program (TBRA) was a total of fifty-one clients (51). During the year three clients were removed from the program due to death.

Discuss how these outcomes will impact future annual action plans.

The October 1, 2021, through September 30, 2022, CAPER is the first performance report of the current five-year planning cycle for Polk County, Florida. Polk County Housing staff gradually increased caseloads and resumed normal project management as we moved into 2022-2023. With the local economic conditions more clients are spending more time at home. HND has seen an increase in the number of requests for rehabilitation assistance.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	24	50
Low-income	1	4
Moderate-income	0	0
Total	25	54

Table 13 – Number of Households Served

Narrative Information

During the 2021-2022 Program Year, we set attainable goals to complete the number of units outlined in the 2021-2022 Action Plan. Although the current circumstances slowed down activities HND rehabilitation staff were able to complete the goals set out in this plan. We did not encounter problems meeting these goals.

From October 1, 2021, through September 30, 2022, the number of households supported through Rental Assistance in the Tenant-Based Rental Assistance Program (TBRA) was a total of fifty-one clients (51). During the year three (3) clients were removed from the program due to death. Forty (40) clients for 30% and below of the area median income. Forty-three (43) are disabled, and twenty (20) are elderly over the age of 62. Forty-nine of the TBRA clients are 31% to 50% of the area median income, all, but one client, are disabled, and twenty-six clients are elderly over 62 years. One client is between 51% and 60% or the area median income. Of the fifty-one TRBA clients three are veterans. Thirty-five (35) of the TBRA clients identify as black/African American and fifteen (15) identify as white, and two (2) indicated Hispanic ethnicity.

The number of homes served by the Rehabilitation Program completed using CDBG funds for Minor Repairs was two (2). The original goal was sixteen (16) and was not met because of the COVID-19 reduction in available contractors due to quarantine and work slowdown.

HOME funds were used to complete the reconstruction of six (6) homes. Two (2) clients were 0-30% extremely low income, two (2) clients were 30% to 50% of the area median income and, two (2) clients were 60% of the area median income.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Polk County Housing and Neighborhood Development staff continue to work closely with the Homeless Coalition to develop strategies to end homelessness. Each year local homeless needs and gaps are evaluated. Working with the Homeless Coalition of Polk County staff research and reviews innovations in programs and service delivery and seeks out available and potential resources.

The County request proposals for funding from area non-profits serving county residents and homeless persons through its CDBG and ESG grants. This year the Polk County contracted with ten (10) organizations/agencies for the provision of these services **of \$493,455 in CDBG funds**. Services provided by local nonprofits consisted of rehabilitation services for the blind, employment solutions for the disabled, comprehensive youth development program, an internship job training program for the homeless, services for homeless low-income pregnant women including case management, life skills training, parenting skills, and job placement assistance, and support for homebound frail elderly residents.

Addressing the emergency shelter and transitional housing needs of homeless persons

Polk County Housing and Neighborhood Development staff continue to work closely with the Homeless Coalition to develop strategies to end homelessness. Each year local homeless needs and gaps are evaluated. Working with the Homeless Coalition of Polk County staff research and reviews innovations in programs and service delivery and seeks out available and potential resources. The County requests proposals for funding from area non-profits serving county residents and homeless persons through its CDBG and ESG grants. This year the Polk County contracted with ten (10) organizations/agencies for the provision of these services **of \$493,455** in CDBG funds. Services provided by local nonprofits consisted of rehabilitation services for the blind, employment solutions for the disabled, child care services for the homeless, substance abuse services/programs for chronically homeless men, comprehensive youth development program, an internship job training program for the homeless, services for homeless low-income pregnant women including case management, life skills training, parenting skills, and job placement assistance, and support for homebound frail elderly residents. The Emergency Solutions Grant (ESG) provided funds for the Talbot House, Peace River Center, Salvation Army, and Catholic Charities to continue their service delivery to Homeless Persons. Emergency Solutions

The Emergency Solutions Grant (ESG) provided funds for the Talbot House, the Women's Resource Center, and Catholic Charities to continue their service delivery to Homeless Persons. Emergency Solutions Grant funds of \$287,967 were allocated to these nonprofit agencies. They provided rental assistance and case manager staffing, shelter operations (Utility Payments for Talbot House) temporary shelter for homeless families with children and family empowerment programs.

This year CDBG Funds were awarded to Gospel Inc. a local nonprofit organization to acquire a property with mixed units consisting of RVs, Mobile Homes, and cottages totaling 24 units in addition to a single-family home and clubhouse. These emergency shelter units are unique from other congregate emergency shelters because each unit has a full kitchen and bath allowing the homeless individuals to be socially distanced. These units will be used to prevent, prepare for, and respond to the Coronavirus outbreak among the chronically homeless in Polk County. These units will continue to serve the chronically homeless in Polk County upon completion of Coronavirus occurrences in Polk County. This nonprofit has strong local support in funding donations and fund-raising efforts. The organization applies for other funding through City and County sources as well as religious affiliations.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Discharge planning coordination is passed along to the Homeless Coalition of Polk County and its member agencies. Every year as part of implementing the homeless discharge coordination policy, the Homeless Coalition/CoC providers have been meeting and reviewing these policies as they relate to preventing, preparing for, and responding to the Coronavirus. ESG-CV homeless prevention funds may be used to assist providers with various community mitigation interventions to reduce the further spread and controlling the impact on health care capacity.

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

Polk County Housing and Neighborhood Development (HND) staff attended the Homeless Coalition of Polk County (HCPC)/Continuum of Care (CoC) monthly meetings. The HND manger Jennifer Cooper is on the Governance Committee and sits on the Project Section Committee. This committee is charged with reviewing annual grant applications for CoC funding through the Homeless Coalition. Another staff member Cedric Cox, Housing Administrative Supervisor a member of the Board of the Coalition. These staff members act as a conduit to current housing funding sources and programs to further the assistance to homeless individuals and families.

Because of the Coronavirus and all the changes that occurred locally to stop the spread of the virus, last year's Point in Time (PIT) homeless survey/count was cancelled. Surveys were taken from existing shelters. The next PIT survey is scheduled for Thursday, January 26, 2023. The count includes both homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation; for humans counted as unsheltered homeless persons. Also, persons living in emergency shelters and transitional housing counted as sheltered homeless persons.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

This year the Polk County Housing & Neighborhood Development Office has addressed the needs of public housing by encouraging and supporting the local Public Housing Authorities (PHA)s in applying for HOME ARP funds to address rental assistance for extremely low-income clients. At the state and local level HOME ARP funds are targeted to various qualified populations including the homeless, and residents at risk of homelessness. Locally there is a scarcity of affordable rental units for this segment of the population. Several local PHAs are investigating this funding opportunity as a leverage with Low Income Housing Tax Credits (LIHTC), bond funds, and other available affordable housing funding sources.

The Polk County Housing and Neighborhood Development Office now contracts with Neighborhood Development Services (H.A.N.D.S of Central Florida, Inc., a Florida not for profit corporation with offices in Orlando and Lakeland. H.A.N.D.S of Central Florida, Inc., is a non-profit organization assisting homebuyers in evaluating their readiness for a home purchase and helping them navigate the home buying process. H.A.N.D.S of Central Florida, Inc. has HUD certified housing counselors and teaches homebuyer education classes. Homebuyer education classes are held in English and Spanish and cover such topics as financial management, budget counseling, pre-purchase counseling, and predatory lending education. H.A.N.D.S of Central Florida, Inc. also conducts non- delinquency post purchase, fair housing regulations, credit counseling and identity theft workshops.

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

The H.A.N.D.S of Central Florida, Inc. active partnerships with the Lakeland Housing Authority, the Winter Haven Housing Authority, and the Bartow Housing Authority. H.A.N.D.S of Central Florida, Inc. works closely with them and their residents. Periodically holds homebuyer and financial literacy workshops for the residents. Individual financial education and counseling services are also provided to prepare residents for successful homeownership. This includes basic financial literacy, understanding and identifying their credit situation as it relates to qualifying for a mortgage loan, and household budgeting. notes that residents from the local Public Housing Authorities commonly attend monthly homebuyer education classes held in Bartow.

Actions taken to provide assistance to troubled PHAs

Polk County's local Housing Authorities are all standard performers.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Polk County will continue to implement the following actions outlined in the Comprehensive Plan Housing Element and the Local Housing Assistance Plan (LHAP) following HUD Regulations 91.215 (b) and the provisions of Florida Administrative Code 67-37.007 to support affordable housing and remove potential barriers. This past year the Florida Housing Finance Agency (FHFA) changed the report on local affordable housing incentive strategies from every three years to annually. This means that each December starting in 2021 a report of local affordable housing incentives available will be developed and sent to the state for review. The Polk County Housing and Neighborhood Development Office developed and obtained approval for a new Affordable Housing Incentive Strategy called the Demolition Lien Waiver. This new incentive encourages the development of affordable housing units on land that has a demolition lien attached. The lien will be waived for the development of an affordable single-family home.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The County addresses regulatory barriers to the development of affordable housing through granting of impact fee waivers for the development of affordable housing. The County amended, restated, and consolidated its Impact Fee Ordinance on May 9, 2007. Each year impact fees are waived for affordable housing single-family and multi-family units. This program remains one of Polk County's most popular programs in support of affordable housing development. From October 1, 2020, through September 30, 2021, a total of \$1,854,997 in impact fees were waived for the development of single-family and multi-family affordable housing units. As part of this total Polk County was able to waive \$ 1,706,616 in impact fees for three low-income housing projects supported by funding from the Florida Housing Finance Corporation.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Polk County continues to evaluate and reduce lead-based paint hazards in all contracts funded with federal monies. Homes built before 1978 are evaluated for lead-based paint and are recommended for demolition and reconstruction. The Housing and Neighborhood Development Office (HND) conducts activities following its *Policy and Procedures* of notification, evaluation, and reduction of lead-based paint hazards to assure compliance with federal regulations. Affordable housing activities address lead-based paint liabilities and provide the required information to affected citizens. HND staff members are planning to attend Lead-based Paint classes when available. At this time, all housing activities comply with regulations regarding lead-based paint notification, evaluation, and abatement. When required, risk assessment, paint testing, lead hazard reduction, and clearance will be performed through contracts with qualified professionals following standards established in 24 CFR part 35, subpart R.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Polk County's anti-poverty strategy focuses upon wealth building for low-income families through the Substantial Rehabilitation/Replacement program using Federal HOME funds and State SHIP funds, and the SHIP funded homeownership Down Payment/Closing Cost Assistance program. Through the Substantial Rehabilitation/Replacement program two (2) units were for extremely low-income families less than 30% of the area median income, two (2) units for very low-income families 31% to 50% of the area median income, and an additional two (2) units served clients at 60% of the area median income.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Polk County Housing and Neighborhood Development Office continues to identify gaps and enhance coordination between institutional structures relating to the Consolidated Planning process and the yearly Action Plan projects. HND staff is available to provide information and technical assistance to low- and moderate-income persons residing in the CDBG target areas. Such activities include neighborhood meetings at community centers, churches, or other convenient locations, community outreach by HND staff, direct contact with neighborhood representatives, and written information concerning the program such as handouts and/or flyers. The Housing and Neighborhood Development informational brochure was updated and was made available in Spanish.

As part of the program year October 1, 2021, through September 30, 2022, through the Urban County partnership agreements the county contracted with three (3) municipal jurisdictions to plan and completed projects using CDBG funds. Polk County partners with non-profit organizations and other agencies for the effective delivery of services. Memoranda of understanding or subrecipient agreements identify the project scope of services; budget and timelines are entered into and used as a management tool ensuring objectives, performance measures, and project delivery are successfully met. Various divisions within the Polk County government provide guidance for project implementation, construction, and completion as well as legal and fiscal oversight.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Technical Assistance workshops and individual technical assistance to help develop viable project proposals are also conducted for municipal partners and public service providers before submitting grant applications to assure that potential projects are more likely to be successful if selected for funding. Attendance at the workshop is strongly recommended for public service providers to be considered for funding. This service provides Housing and Neighborhood Development staff the opportunity to clarify the objectives of the CDBG program and build the capacity of local service providers and municipalities that share similar goals. Links to the HUD Exchange and other reference materials outlining the grant rules and regulations are provided to workshop attendees, program-specific handouts to assist with grant application preparation.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

After review of the data, the following impediments to fair housing choice were identified:

Impediment # 1. Need for education and outreach;

Action Taken: During the 2020-2021 program year the HND informational brochures were redesigned, and a Spanish version was developed. Staff distributed the Spanish language brochure at yearly neighborhood events.

Impediment # 2. Need for coordination between area agencies, local governments, and local housing authorities;

Action Taken: During the 2020-2021 program year the Housing and Neighborhood Development Manager has been meeting one on one with local governments, city managers, housing, and planning staff.

Impediment # 3. Need for rental subsidy and financing mechanisms to assist low to moderate-income homebuyers and renters;

Action Taken: Significant funding support for affordable housing developments is offered through the federal Low-Income Tax Credits (LIHTC) program. The LIHTC program is governed by the U.S. Dept. Of the Treasury, and Florida's allocation is administered by the Florida Housing Finance Corporation (FHFC). The LIHTC program provides a dollar-for-dollar reduction in federal tax liability in exchange for the development or rehabilitation of units to be occupied by very low- and low-income households. HND staff monitors the release of these applications and works closely with developers during the HND competitive application. Last year a Request for Application (RFA) process was developed to assist with various applications for the development of affordable rental housing. This year impact fees were waived in the amount of \$ 1,854,997 for the successful applicants. The three approved multifamily projects resulted in 256 new apartment units here in Polk County. Funding for rental housing is available in a variety of loans, bridge loans, and grants. Most developers rely on multiple funding sources when applying for these funds.

Impediment # 4. Need for homebuyer education to assist the purchaser to qualify for a home loan.

Recommended Actions; a. Increase awareness by providing fair housing information on the County website.

Action Taken: This impediment will be addressed in the next year following revisions to the Fair

Housing Information to meet **the ADA standards for the Polk County** website publications.

b. Continue to receive and update fair housing information flyers from Florida Commission on Human Relations.

Action Taken: **HND staff member recently attended Fair Housing training at a yearly Florida Housing Coalition Conference.** New contacts were made with the Florida Commission of Human Relations for updates and future assistance with the Analysis of Impediments to Fair Housing (AI) plan updates. HND will distribute fair housing materials at community events.

Action Taken: The staff provides this information at local events. The staff works with cities, housing authorities to further fair housing choice, hold joint meetings and workshops.

Action Taken: Continue Polk County Homebuyer Education Programs, including a segment for Fair Housing Rights and information about filing a complaint locally.

Action Taken: The Housing Counseling Agency contracted to provide Home Buyer Education classes continues to address Fair Housing in all classes held in English and Spanish.

Impediment #5. Address Fair Housing in the following Polk County Housing Programs:

- a. Polk County Tenant-Based Rental Assistance (TBRA) Program.
- b. Polk County Housing Rehabilitation Programs.
- c. Polk County State Housing Initiatives Partnership Program (SHIP).

Action Taken: Reviewed existing Fair Housing client educational fair housing materials and update handouts and brochures.

CR-40 - Monitoring 91.220 and 91.230

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

To ensure compliance with the program and comprehensive planning requirements, staff attends webinars for new compliance guidelines when there are rule changes and updates. When appropriate, staff confers with the HUD Exchange and our HUD Representative in Jacksonville for regulatory guidance. During the implementation process, each project is evaluated and verified for eligibility requirements with the CDBG 24 CFR.570 , CFR 2 Part 200 and the new Section 3 rules. Regulations are reviewed in the “CDBG Desk Guide”, and the “CDBG Guide to Eligible Activities”. A risk factor analysis is performed for each contract for grant funds. When a risk factor is established the project manager determines the extent to which the client will need technical support during the program year. Technical assistance is provided to each subrecipient by professionally trained CDBG/HOME/ESG program managers. Weekly contact ensures program compliance and prohibits the inaccurate expenditure of funds. Monthly reports are required for each project to confirm adherence to program regulations and to evaluate progress. HND follows a policy of long-term monitoring in addition to monitoring projects being carried out during the current program year. Long-term monitoring applies to projects that have oversight requirements in force after the initial agreement ends. HND has in house monitoring staff that conducts monitoring during this specified length of time as a means of ensuring compliance with these requirements. Additionally, HND monitors those CDBG projects that require extended oversight such as phased large infrastructure projects with multi-year funding. Minority Businesses are encouraged to bid on HND demolition, rehabilitation, and reconstruction projects.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Notice of availability of a draft copy of the Consolidated Annual Performance and Evaluation Report (CAPER) for public inspection and comment was published Thursday, December 1, 2022, in the Lakeland Ledger. The public comment period ran from Thursday, December 1 , 2022, to Thursday December 15, 2022. The notice was also posted on the Polk County Website under the Housing and Neighborhood Development tab at: <https://www.polk-county.net/health-and-human-services/housing-and-neighborhood-development>.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

This year the Polk County Housing and Neighborhood Development office continues to work with grant funds that are to address the results of the Coronavirus locally. Additional CDBG, HOME-ARP and ESG funds were received for assistance to prevent, prepare for, and respond to the coronavirus. The HOME ARP (American Rescue Plan) Allocation Plan is being prepared for submission to HUD. HND will be following HUD's directives to program these new funds to assist locally with approved projects as outlined in the regulations.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

We are not a BEDI Grantee.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Polk County inspects the Tenant-Based Rental Assistance (TBRA) units annually as outlined in the Polk County TBRA program policies manual. §92.504(d)(1)(iii) is revised to confirm the reference to the applicable property standards at 24 CFR 982.401 (HQS) or any successor requirements imposed by HUD. The requirement for annual on-site inspections of housing occupied by TBRA recipients to determine compliance with property standards has not changed.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The following actions were taken during FY 2021-2022 to address affirmative marketing goals:

Continued to develop and provide affordable housing by; 1.) implementing outreach and educational programs targeted to potential purchasers, 2.) Continue to research zoning and land use regulations that present statutory impediments to fair housing. 3.) Continue to include all notices for funding advertisements in local newspapers with the largest circulation. 4.) Maintain Homebuyer education classes monthly in English and Spanish. 5.) Add extra classes upon request to local communities and churches. 6.) Maintain information regarding existing rental assistance under the HOME funds tab on the Housing and Neighborhood Development's Polk County Web page.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

Data relating to the amount and use of program income for projects and project characteristics are summarized on the attached Integrated Disbursement and Information System (IDIS) reports. Polk County uses HOME program income for current rehabilitation/reconstruction projects. At the beginning of the program year 2021, Housing and Neighborhood Development had a balance of \$31,991.93 of HOME Program Income (PI). These funds have been assigned to a reconstruction project.

For the program year 2021-2022, HOME program income of \$132,442 was received. Of this amount, \$13,244.20 was budgeted for grant administration and \$119, 197.80 will be used to complete a reconstruction project for this year.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Polk County uses HOME funds and State SHIP funds as the primary source of funds for affordable housing. In the fiscal year 2020-2021, Polk County expended \$ 640,076.36 in HOME funds to complete six reconstruction projects. During the last year CHDO funds from the previous year were used to finish construction of two (2) new CHDO units. Total funding for these units was planned in 2019 for \$240,000. The funds were drawn down and the activities need to be closed in IDIS. Due to construction supply line delays the new units were delayed by several months. The 2020-2021 CHDO funds are currently be used to complete the construction of an additional two (2) units total expended to date is \$75,582. These units will be complete in the next two months. SHIP funds of \$ 855,234.03 were used for owner-occupied major/minor rehabilitation and demolition/reconstruction of housing units. CDBG funds of \$ 202,124.88 were used for the Minor Repair and the Demolition Program.

Rental assistance was provided to very low-income households through the HOME funded Tenant-Based Rental Assistance (TBRA) program. From October 1, 2021, through September 30, 2022, the number of households supported through Rental Assistance in the Tenant-Based Rental Assistance Program (TBRA) was a total of fifty-one clients (51). During the year no clients were removed from the program due to death and lease violations. Thirty-one (31) clients were 30% and below of the area median income. Of these twenty-six (26) are disabled, and thirteen (13) were elderly over the age of 62. Eighteen of the TBRA clients were 31% to 50% of the area median income, all are disabled, and ten clients are elderly over 62 years. One client was between 51% and 60% or the area median income. Of the fifty TRBA clients two are veterans. Thirty-five (35) of the TBRA clients identify as black/African American and fifteen (15) identify as white, and two (2) indicated Hispanic ethnicity.

This year the State SHIP funds of \$570,000 were expended to assist forty (40) clients with down payment and closing costs. Home Buyer Education classes were held this year in English and Spanish. A total of nine hundred and eighty-one (981) people attended these classes this year. English classes were attended by eight hundred and eighty-one (881) people, and Spanish classes had one hundred (100) people in attendance.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	POLK COUNTY
Organizational DUNS Number	078315959
EIN/TIN Number	596000809
Identify the Field Office	JACKSONVILLE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Ms.
First Name	Nancy
Middle Name	0
Last Name	Hurley
Suffix	0
Title	Housing Compliance Manager

ESG Contact Address

Street Address 1	1290 Golfview Ave. Suite 167
Street Address 2	P.O. Box 9005
City	Bartow
State	FL
ZIP Code	33831
Phone Number	8635345244
Extension	0
Fax Number	0
Email Address	NancyHurley@Polk-County.net

ESG Secondary Contact

Prefix	Ms.
First Name	Jennifer
Last Name	Cooper
Suffix	0
Title	Housing & Neighborhood Development Manager
Phone Number	8635345209
Extension	0
Email Address	jennifercooper@polk-county.net

2. Reporting Period—All Recipients Complete

Program Year Start Date 10/01/2021
Program Year End Date 09/30/2022

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Talbot House Ministries

City - Lakeland

State - Florida

Zip Code - 33801

DUNS Number - 831184411

Is subrecipient a victim services provider - no

Subrecipient Organization Type - Nonprofit Homeless Shelter

ESG Subgrant or Contract Award Amount - \$72,000

Subrecipient or Contractor Name: Catholic Charities

City - Lakeland

State - Florida

Zip Code - 33801

DUNS Number - 13577143

Is subrecipient a victim services provider - no

Subrecipient Organization Type - Nonprofit Homeless Services Provider

ESG Subgrant or Contract Award Amount - \$72,000

Subrecipient or Contractor Name: Women’s Resource Center

City – Winter Haven

State - Florida

Zip Code - 33881-4501

DUNS Number - 114330541

Is subrecipient a victim services provider - no

Subrecipient Organization Type - Nonprofit Homeless Services Provider

ESG Subgrant or Contract Award Amount - \$72,000

Subrecipient or Contractor Name: Mulberry Community Service Center

City – Mulberry

State - Florida

Zip Code - 33881-4501

DUNS Number - 114330541

Is subrecipient a victim services provider - no

ESG Subgrant or Contract Award Amount - \$72,000

CR-65 - Persons Assisted – This section Reported in the SAGE System See SAGE Report Attachment

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of bed - nights available	616
Total Number of bed - nights provided	616
Capacity Utilization	100%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Polk County HUD ESG funds are allocated in two-year funding cycles. The funds were used to support shelter operations, supportive and case management services to the homeless, homeless prevention and rapid rehousing services. The County had subrecipient agreements with Talbot House Ministries, Catholic Charities, Women’s Resource Center, and the Mulberry Community Service Center. All ESG program and activities were coordinated with the homeless Continuum of Care (CoC) and service providers. Current performance standards for ESG were developed with the input from the CoC and ESG funded providers based on their experience and HMIS data. The CoC developed these performance standards and updates them and shares these standards with the ESG providers. The Polk County Housing & Neighborhood Development office monitors ESG drawdowns, Annual Renewal Performance (ARP) metrics on a quarterly basis, and directly evaluates outcomes of ESG funded programs. The CoC currently provides PIT (Point in Time) and HMIS (Homeless Management Information System) information to the ESG recipients to assist in the development of performance standards. Each year the results of the PIT are shared with the CoC Board and used to prioritize ESG and CoC homeless needs investments. PIT information is given the HND to use in the yearly planning process.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	\$ 41,290	\$ 91,651
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program		0	0
Subtotal Homelessness Prevention		\$ 41,290	\$ 91,651

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	\$ 14,612	\$ 43,211
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program		0	0
Subtotal Rapid Re-Housing		\$ 14,612	\$ 43,211

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Essential Services	0	0	0
Operations		\$ 6,261	\$ 35,891
Renovation		0	0
Major Rehab		0	0
Conversion		0	0
Subtotal		\$ 6,261	\$ 35,891

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Street Outreach	0	0	0
HMIS			\$ 30,000
Administration	0	0	\$ 20,007

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2019	2020	2021
		\$ 62,172	\$ 220,759

Table 29 - Total ESG Funds Expended

11f. Match Source

	2019	2020	2021
Other Non-ESG HUD Funds			
Other Federal Funds			\$ 110,000
State Government			
Local Government			
Private Funds			\$ 178,000
Other			\$ 61,000
Fees			
Program Income			
Total Match Amount			\$ 349,000

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2019	2020	2021
		\$ 62,172	\$ 569,760

Table 31 - Total Amount of Funds Expended on ESG Activities

**Polk County IDIS Reports for the CAPER –
October 1, 2021, to September 30, 2022**

15 Day Public Review and Comment Ad

PR-01 HUD Grants and Program Income

PR-02 List of Activities by Program Year and Project 2021-2022

PR-02 List of Activities by Program Year and Project 2019-2021

PR-06 Summary of Consolidated Plan Projects for Report Year 2021-2022

PR-22 HOME Status of Open Activities and Activities completed in the Last Year

PR-25 Status of CHDO Funds by Fiscal Year 2021-2022

PR-26 CDBG Financial Summary Report Program Year 2021-2022

PR-26 CDBG-CV1 Financial Summary Report Program Year 2021-2022

PR-27 Status of HOME Grants

PR-33 HOME Match Liability Report

2021 HUD ESG CAPER/Sage Report HESG submitted in the SAGE System