



**Substantial Amendment to the
2021 Annual Action Plan HOME-ARP Allocation Plan
Amendment No. 2**

December 3, 2024

**Polk County Housing and Neighborhood
Development Office**



Table of Contents

Consultation	2
Public Participation.....	4
Needs Assessment and Gaps Analysis.....	5
OPTIONAL Homeless Needs Inventory and Gap Analysis Table	6
OPTIONAL Housing Needs Inventory and Gap Analysis Table.....	6
HOME-ARP Activities.....	14
HOME-ARP Production Housing Goals	18
Preferences	20
HOME-ARP Refinancing Guidelines.....	20

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Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

To review the HOME ARP Allocation Plan Amendment No. 2 Polk County invited citizen participation through advertisement of the HOME-ARP Allocation Plan Amendment No. 2 and public meeting in the Sun News local newspaper, and announced it on the Polk County website, plus made it available for review at the HND office anytime during. Public comment was open for 15 calendar days from October 16, 2024, to October 28, 2024. The public meeting was held October 23, 2024.

Prior to developing the HOME ARP Plan, the Polk County Housing and Neighborhood Office consulted with the local Continuum of Care (CoC) this is the only CoC serving all of Polk County. The Allocation Plan Tenant Based Rental Assistance (TBRA) project was presented at the **October 16, 2024, Homeless Coalition member meeting**. The Homeless Coalition of Polk County (HCPC) is the lead agency for the Lakeland-Winter Haven Continuum of Care (CoC). Individuals and agencies representing homeless services providers, veterans’ groups, public housing agencies, and agencies that assist with the disabled attended the consultation and input meeting. Citizen input was invited through a **local newspaper advertisement, an announcement on the Polk County website**, and through an agenda announcement for the monthly HCPC membership meetings. Limited English proficient attendees were directed to a Housing and Neighborhood **Development bi-lingual staff person**.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeless Coalition of Polk County (CoC)	Homeless Services Organizations Membership and CoC Lead	Coc Membership Meeting input meeting	The Executive Director of the Homeless Coalition gave an overview of the HOME ARP Allocation Plan Amendment No.

	Agency		2 TBRA project at the October 16 membership meeting. After the presentation during the question-and-answer session the members discussed the lack of affordable rental housing in the County.
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Public Participation – HOME-ARP Allocation Plan Amendment No. 2

The Polk County Housing and Neighborhood Development Office provided for and encouraged citizens participation in the development of the HOME-ARP Allocation Plan Amendment No. 2 by providing a 15-day public notice of the amendment and a public meeting to review and comment on the amendment to the HOME-ARP Allocation Plan. A copy of the Plan was made available for public comment, and the meeting and comment period was notices on the county’s website and in the Sun News.

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, - Polk County received \$5,105,519
- The range of activities the PJ may undertake – Polk County will undertake multi-family new construction/development.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public comment period: start date – 5/09/2022 end date – 5/23/2022***
- ***Public Meeting: 5/25/2022***

Summary of comments:

Two comments were received during the Public Meeting:

- 1.) On the displayed funding chart, why is the SHIP total cost \$500,000. It should be \$21,721,258 and the units need to be revised too. This was corrected in the chart after the meeting.
- 2.) The Executive Director of the Homeless Coalition of Polk County, Bridget Engleman, asked if the units did not lease up with the clients in the qualifying populations could they be leased to other populations. During the follow up phone call to address this question HND staff explained that the units must be leased to the qualifying populations listed in the HOME Notice: CPD-21-10 Issued: September 13, 2021. Discussion ensued regarding the availability of tenant vouchers for these units. HND staff indicated that during the upcoming planning process for the next grant year this request would be brought forth for funding request and review.

Describe any efforts to broaden public participation:

Efforts to broaden public participation included advertisement of the public comment period and public hearing in the local newspaper, with a staff contact for the Limited English Proficiency (LEP) population needing information in Spanish. The draft HOME-ARP Allocation Plan was made available on the Polk County Housing and Neighborhood Development website for public review, in Spanish and ad ADA compliant format.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

During the Public Meeting held May 25, 2022, the Executive Director of the Homeless Coalition of Polk County asked if the units were not filled with the qualifying populations could they be rented to other residents. HND staff called and explained that all units were to be leased to qualifying populations as outlined in the CPD-21-10 Notice Requirements for the Use of Funds in the HOME - American Rescue Plan Program.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments and recommendations were accepted.

Needs Assessment and Gaps Analysis

The Polk County Housing and Neighborhood Development Office evaluated the size and demographic composition of qualifying populations within its boundaries and assessed the unmet needs of those populations. After consulting with the Continuum of Care Providers, members of the Homeless Coalition of Polk County, citizens and interested developers of affordable we identified gaps within our current shelter and housing inventory as well as the service delivery system. Current census and housing data, including the point in time count, housing inventory count, and other data available through CoCs was used to identify the gap of available affordable rental units in Polk County. After consultations with service providers, it was abundantly clear that the individuals and families in the qualifying populations had an urgent need for additional housing, shelter, and services. The tables provided below illustrate the need and gaps in available affordable rental units.

According to the Polk Vision LEAD Behavioral Health Strategic Plan Development and Sequential Intercept Mapping Report published June 2021; Gap Analysis and Needs Assessment was conducted through stakeholder interviews, community surveys, and group discussions. Both availability and affordability of housing were addressed, and many cited the need for more places for certain populations, such as people experiencing homelessness who also suffer from substance misuse, and victims of domestic violence. Issues accompanying homelessness or related issues dominate list of ranked community issues. Housing, social services, and healthcare for people experiencing homelessness are seen as requiring much more focus.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	153	36	120	120	0								
Transitional Housing	219	55	139	139	0								
Permanent Supportive Housing	33	12	53	53	117								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						151	234	17	13				
Unsheltered Homeless						7	183	22	4				
Current Gap	#	#	#	#	#					#	#	#	#

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	73,173		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	11,995		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,775		
Total	22,770	#	#
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		36,130	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		10,775	
Total		46,905	
Current Gaps			(24,135)

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Polk County Qualifying populations include persons experiencing homelessness, households at risk of homelessness, persons fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other populations. Other populations include very low-income households at or below 30% AMI (at-risk of homelessness), households requiring services or housing assistance to prevent homelessness, households with income between 30-50% AMI experiencing one or more severe housing problems, and veterans and families that include a veteran family member that meet the one of other criteria described.

The Polk County Housing and Neighborhood Development Office evaluated the size and demographic composition of the four qualifying populations within its boundaries and assessed the unmet needs of these populations. This analysis was done by reviewing the Homeless Needs Inventory and Gap Analysis data that was gathered from the Continuum of Care Housing Inventory County (HIC) and Point in Time Count (PIT) for the 2022 Polk County homeless persons count.

The Homeless Coalition of Polk County which is the Lead Agency for the Continuum of Care noted the pandemic prevented an unsheltered PIT Count in 2021. At the time of the 2020 Point in Time Count, 612 people were counted as individuals experiencing homelessness within the FL-503 Lakeland/Winter Haven/Polk County CoC area. Of the 565 individuals experiencing homelessness, 375 individuals (66%) were residing in a sheltered location and 190 individuals (34%) remained unsheltered.

Black/African Americans accounted for 198 of the respondents or 35% of the total group experiencing homelessness during the 2020 PIT Count.

At the time of the 2020 Point in Time Count, 15 persons experiencing homelessness identified were also victims of domestic violence. Person fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by HUD, are also a sector of the qualifying populations.

The at-risk of homelessness sector of Qualifying Populations is defined in 24 CFR 91.5. Characteristics attributed to housing instability and increased risk of homelessness include having a household income between 0-30% AMI, experiencing severe housing cost burden, a person with a disability living along on a fixed income, household members with physical disabilities and other chronic health issues, poor credit and/or no credit history, and households with a family member who has a record of criminal history. The Housing Needs Inventory and Gap Analysis identified 46,905 renter households within the County experiencing one or more severe housing problems with very low income at or below 30% AMI. Households within the 0-30% AMI income category are most impacted by severe cost burden. Other renter households, Elderly owner households, and Small Related owner households are the household types most impacted by housing severe cost burden. Renters are disproportionately affected by severe cost burden in Polk County.

Homeless Needs Inventory and Gap Analysis data was gathered from the Continuum of Care

Housing Inventory County (HIC) and Point in Time Count (PIT). The CoC did not perform a PIT Count in 2021 due to the pandemic. At the time of the 2020 Point in Time Count, there were a total of 504 individual persons experiencing homelessness within the Polk County area. Of the 541 individuals experiencing homelessness, 363 individuals were residing in a sheltered location and 178 individuals remained unsheltered. A review of 2019 racial and ethnic Census data shows that ethnic data tracks with the general population. Hispanic/Latinos represent 10.8% of the homeless population as compared to 16.4% of the general population. Racial data shows a very different story. Blacks or African American make up 30.1% of the homeless population, but they make up only 20.5% of the overall population. This shows that Blacks/African Americans are disproportionately represented in the homeless population. Whites make up 72.3% of the population, but only 62.1% of the homeless. Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by HUD, are also a sector of qualifying population. The 2020 Point in Time Count did not identify victims of domestic persons experiencing homelessness identified were also victims of domestic violence.

Additionally, there are 36,130 renter households, with zero/negative to 30% AMI with one or more severe housing problems or at risk of homelessness. These households are qualifying populations for at-risk of homelessness. The Housing Needs Inventory also identified 10,775 renter households with income between 30-50% AMI as well.

The 2021 Five-Year Consolidated Plan identified elderly households at greatest risk, as documented by 2017 CHAS data on high and severe levels of cost burden. It is difficult to estimate the number of families with a disabling condition in need of housing assistance. However, data on households that live below the poverty level and households that qualify for other assistance programs may be indicative of the need for housing assistance. According to the Social Security Administration for the year 2020 there were 23,328 households in Polk County that received Supplemental Security Income (SSI) benefits.

Veterans and families that include a veteran family member that meet the criteria for one of the qualifying populations described as at Greatest Risk of housing instability are eligible to receive HOME-ARP assistance. At the time of the 2020 PIT Count, 44 persons experiencing homelessness identified were also Veterans and Families that include a Veteran Family Member. The 44 persons in this population meet the additional qualifying population criteria of homelessness and therefore are eligible to receive assistance through HOME-ARP.

Based on the Housing and Homeless Needs Inventory data, the total Qualifying Populations, which is composed of the homeless population, households at risk of homelessness (0-30% AMI), and other populations needing assistance to achieve housing stability such as households with an income between 30-50% AMI who are experiencing one or more severe housing problems, is 46,905 households.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- *Sheltered and unsheltered homeless populations;*
- *Those currently housed populations at risk of homelessness;*
- *Other families requiring services or housing assistance or to prevent homelessness; and,*
- *Those at greatest risk of housing instability or in unstable housing situations*

The highest priority based on multiple consultations with local nonprofits, affordable housing developers, and interested citizens is the availability of affordable rental housing units. Supportive services are needed to help transition households into safe and sustainable housing. Supportive services can take the form of housing counseling, financial assistance, financial counseling, Tenant Based Rental Assistance (TBRA) and employment services.

As reported in the 2022 PIT Count completed by HCPC sheltered and unsheltered homeless populations need access to non-congregate shelter (NCS) units. Overall, 128 or 25% of persons experiencing homelessness reside in an unsheltered location. Additionally, 68 persons experiencing homelessness disclosed having a Serious Mental Illness (SMI). There were 25 persons who were listed as having a chronic substance abuse disorder.

There were 4 individuals experiencing homelessness who self-disclosed being a person with an HIV/AIDS diagnosis. An increase in rental units for the qualifying populations would address the unmet need of persons experiencing unsheltered homelessness. HCPC served 87 people fleeing Domestic Violence during the timeframe of 10/1/2020 to 9/30/2021.

Additionally, 2 persons experiencing homelessness disclosed being a person with HIV/AIDS diagnosis. Furthermore, 87 persons experiencing homelessness were also Victims of Domestic Violence. Of the 87 Victims of Domestic Violence experiencing homelessness. These persons would benefit from both emergency shelter units and supportive services.

The unmet needs for the populations at risk of homelessness include resources for rental or utility deposit assistance and development of affordable rental housing units. The housing problems affecting most renters and homeowners in Polk County are housing cost burden and severe cost burden. Elderly households are at greatest risk of experiencing cost burden. These households living in the County require access to financial support to obtain and maintain housing. Additionally, an increased stock of available and affordable housing units would alleviate this unmet need. Other resources such as supportive services for economic development, housing counseling, and workforce development training or employment opportunities that would increase household income could also address the unmet housing needs of the qualifying population.

Other Populations that qualify include those at risk of housing instability or in unstable housing situations. The populations at greater risk of housing instability or in unstable housing situations due to limited income and high service needs to support independent living are elderly, persons with disabilities, persons reporting substance abuse, and victims of domestic violence.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units,

supportive services, TBRA, and affordable and permanent supportive rental housing:

Current resources (but are always in short supply due to existing needs versus availability of resources) available to assist the unmet housing and service needs of qualifying populations include but are not limited to affordable housing rental units, supportive services, rent and utility deposit assistance, and employment opportunities.

Polk County Housing and Neighborhood Development Staff work closely with the Lakeland/Polk County CoC managed by the Homeless Coalition of Polk County (HCPC). Addressing the needs of at-risk households and households experiencing homelessness twenty-five (25) member organizations focus resources and services to assist the homeless individuals and families in Polk County. The Coc Annual Plan outlines goals and strategies that align with Polk County's 2021-2025 Consolidated Plan goals and HOME ARP Allocation Plan projects. The CoC's Strategies are:

- Increase the use and availability of Permanent Supportive Housing;
- Advocate for increased development of affordable housing within the local community;
- Continue support for existing Rapid Rehousing projects.

The streamlined assessment tool, the Vulnerability Index- Service Prioritization Decision Assistance Tool (VI-SPDAT) offers a consistent way to evaluate each person experiencing a housing crisis, linking them to timely services and completing referrals to housing programs intended to stabilize their living situation. Working in collaboration with various systems of care to identify, assess, and refer persons experiencing homelessness to the CoC, and the network of direct service organizations provide targeted services and supports through the housing crisis response system and employ specific interventions based on the status of homelessness, as defined by HUD.

HCPC coordinates existing shelter and support programs, evaluating unmet needs and explores possible resources for filling those needs. HCPC's homeless prevention services assists clients to prevent them from becoming chronically homeless and may include financial assistance for rent, mortgage, or utilities, case management, assistance with budgeting, and financial counseling to prevent homelessness. If the household is evicted, the HCPC/CoC may divert the individual using mediation services, financial assistance, budgeting/financial counseling, and identifying other temporary housing resources such as friends or family to prevent entrance into the housing crisis response system.

Clients who are victims of domestic violence are referred out immediately to a shelter. If they refuse to go to a shelter they are put on the Coordinated Entry (CE) list for immediate housing. CE is priority list for housing assistance and domestic violence clients are prioritized and referred to a provider for housing. Most shelters in Polk County require a police report for domestic violence victims and they must present it to receive a shelter bed.

When a person is transitioned out of instructional care local services are provided. Currently a provider of the CoC is under contract with a local medical facility to coordinate discharge for acute care at their shelter when they are release.

Households participating in HCPC’s Rapid Rehousing (RRH) programs can receive supports to achieve educational and employment goals to ensure that, upon exit from the time-limited program, the household income is substantial enough to continue supporting the housing expenses. Increased economic independence will prevent future episodes of homelessness, as the household can maintain the lease agreement. The RRH strategy incorporates support services, and the case manager works to provide housing stabilization supports. It is also necessary to link the participant to on-going services that will enhance their ability to maintain their housing. The financial assistance is re-evaluated as the program progresses to increase the household’s contribution to rent and other household expenses while the program phases out.

As outlined in the 2021-2025 five-year Consolidated Plan, Polk County HND prioritized addressing the affordable housing needs that target households comprised of families, elderly, persons with disabilities, homeless persons, or persons at-risk of becoming homeless, and persons with special needs. Polk County TBRA program assists approximately 50 elderly and disabled clients yearly.

Polk County’s State Housing Initiatives Partnership (SHIP) Local Housing Assistance Plan (LHAP) outlines local strategies for rental and homeownership activities aimed at extremely low, very low, low, and moderate- income residents. Eligible activities through the SHIP program include:

- Purchase Assistance
- Demolition/Reconstruction
- Owner Occupied Rehabilitation- (Minor and Major Repairs)
- New Construction and Redevelopment-Homeownership
- Rental Development Subsidies
- Rapid Rehousing Assistance and Homeless Prevention-Rental
- Foreclosure Prevention
- Disaster Repair/Mitigation

Additionally, resources are available to the Qualifying Populations through a special allocation to prevent and respond to the spread of COVID-19. Qualifying Populations are disproportionately impacted by COVID-19. Polk County received \$5,064,693 CARES Act (CDBG-CV1 and CV3) funds and \$3,128,211 in Emergency Solutions Grant CARES Act (ESG-CV) funds. The funds are used to administer public services including rental and mortgage assistance housing programs. Additionally, the funds are used for public facilities renovation activities. The ESG-CV funds support resources including emergency shelter operations, homelessness prevention and diversion, and rapid rehousing. These resources are available through partnership with the lead CoC – HCPC.

Over the last two years the Polk County Housing and Neighborhood Development has funded public services and public facilities improvements with the ESG-CV funds.

ESG-CV funds were awarded to Catholic Charities, Talbot House Ministries, and the Women’s Resource Center. Facilities Improvements using ESG-CV2 funds were awarded to Talbot House Ministries for Facilities Expansion and the Peace River Center Crisis Stabilization Medical Facility.

Identify any gaps within the current shelter and housing inventory as well as the service

delivery system:

The current Homeless Needs Inventory and Gap Analysis data gathered from the 2021 Continuum of Care Housing Inventory Count (HIC) shows there is a need to continue to invest in shelter and housing for the homeless population to maintain level of service. Although the pandemic prevented a Point in Time Count in 2021, the 2022 PIT identified 372 unsheltered homeless adults without children. There were 31 chronically homeless adults and children reported as unsheltered as well.

According to the gaps analysis 36,130 people in Polk County that are 0%-30% AMI Renter Households have one or more severe housing problems and are at risk of homelessness.

The 2021 Homeless Needs Inventory Count Report shows Family beds in emergency shelter, transitional housing, Rapid Re-Housing, and other permanent supportive housing compared to homeless population of Family households with at least 1 child. The majority of the beds are the 281 beds in 36 units of emergency shelter, followed by 203 beds in 20 units of permanent supportive housing and 139 adults only beds in 55 units of transitional housing.

According to the University of Florida Shimberg Center for Housing Studies, within Polk County there are 93 properties totaling 7,450 assisted units that are funded by Florida Housing Finance Corporation, HUD Multifamily, USDA Rural Development, Local Housing Finance Authority, and HUD Public Housing. CDBG, HOME, and State Housing Initiative Partnership (SHIP) dollars are allocated to activities that improve and increase the housing stock for low to moderate income residents. Polk County needs to expand the housing stock of affordable and available units to households of various income ranges. Households at or below 50% AMI are most impacted by cost burden and the gap in affordable housing options. The County and its residents will benefit from investment in activities that will create new homes for homeownership and support rental assistance and the creation of rental units for households maintaining lower income. Polk County's rental housing need is 24,135 rental units to address the current cost burden gap. Homebuyer assistance and housing subsidies remain limited, creating barriers for housing choice among a substantial majority of residents within the jurisdiction who cannot achieve homeownership and rely on the very limited supply of housing affordable to their income.

According to the 2022 GAP Report published by the National Low Income Housing Coalition, no state has an adequate supply of rental housing affordable and available for extremely low-income households. Florida is one of the states where extremely low-income renters face the greatest challenges finding affordable homes with only 26 affordable and available rental homes for every 100 extremely low-income renter households.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

Characteristics shared by the populations at greater risk of housing instability or an increased risk of homeless defined by "other populations" include limited income and high service needs to support independent living. This population includes elderly, persons with disabilities, persons reporting substance abuse, and victims of domestic violence. Characteristics attributed to housing instability

and increased risk of homelessness include having a household income between 0-30% AMI, experiencing severe housing cost burden, a person with a disability living alone on a fixed income, household members with physical disabilities and other chronic health issues, poor credit and/or no credit history, and households with a member who have a record of criminal history. According to the Homeless Coalition of Polk County 2019 count, there are 563 people who are homeless in Polk County – 80 of whom are chronically without shelter.

A report released in August 2021 from Polk Vision states that, nationally, nearly half (45%) of people experiencing homelessness suffer from mental health issues and approximately 35% of those exhibit symptoms that are of a serious nature, like schizophrenia, bipolar or major depression – this compared with 6% among the general population.

In Polk County for 2022 studies show 3,583 students are classified as homeless. That is 360 more students than last year. The surge in housing costs is increasingly affecting struggling families

Identify priority needs for qualifying populations:

While one of the priority needs for populations at-risk of Homelessness with incomes of 30-50% AMI is funds for rental assistance to relieve severe cost burden; the situation in Polk County is still the chronic lack of existing affordable rental units that this population would be able to access.

After gaining the input from the local service providers and completing data collection regarding the housing affordability and availability, this priority remained at the top of the list. HOME ARP Funds will be directed toward the development of affordable rental housing units for the qualifying populations. Currently Polk County Housing and Neighborhood Development manages 50 TBRA vouchers for elderly and/or disabled clients. An increase in this assistance would address a gap for this population.

Non-congregate shelters provide units that addresses the need of the homeless population that are single and without children. A significant portion of the qualifying population experiencing homeless fit this description.

To reiterate the largest gap the Qualifying Populations are facing is access to affordable rental housing units. As shown in the Housing Needs Inventory Gap Analysis Tables, there is a deficit of 24,135 housing units available to the Qualifying Populations. Demand also surpasses the supply of zero- and one-bedroom rental units in the jurisdiction. Development of affordable rental housing of this type is needed to transition many individuals out of assisted and/or temporary housing into permanent market-rate housing affordable at their income level.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The level of need and gaps in shelter and housing inventory and service delivery systems were determined through the data presented in the Housing Needs Inventory and Gap Analysis Tables,

information available in the Consolidated Plan, and direct consultation with homeless, housing, and nonprofit service providers as part of the Continuum of Care (CoC). The nonprofit service providers were asked to provide input as this plan was developed. Data from the Shimberg Center for Housing Studies was utilized, as well as the GAP Report and Out of Reach Report for the National Low Income Housing Coalition (NLIHC). Developers that were interested in multifamily development using Low Income Housing Tax Credit (LIHTC) dollars were invited to a consultation workshop along with interested citizens. The LIHTC program finances the construction, rehabilitation, and preservation of housing affordable to lower-income households. LIHTC funds can be used to support a variety of projects including multifamily new construction for housing for the elderly or people with disabilities, and permanent housing for homeless families and individuals.

These applications are vetted by the Florida Housing Finance Corporation (FHFC) and involve updating local housing market studies,

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

For HOME ARP Allocation Plan Substantial Amendment No. 2 -

The Homeless Coalition is currently under contract with the Housing and Neighborhood Development Office for HOME TBRA this contract expanded to include these additional funds and this project using the HOME ARP funds. Because these funds are a different source of a new contract will be developed and presented for approval.

On Monday, December 13, 2021, at 3:30 p.m. the Polk County Housing and Neighborhood Development Office held a Virtual Workshop and Consultation Meeting for the HOME American Rescue Plan (ARP) Funds Allocation Plan. The meeting provided an overview of Polk County's HOME ARP Allocation Plan and discussed the upcoming Request for Proposal (RFP) process. On Wednesday, December 15, 2021, the RFP was released to solicit proposals for HOME ARP (American Rescue Plan) Funds supporting Multifamily Rental Development Projects targeted to people experiencing or at imminent risk of homelessness, and other vulnerable populations. At the meeting it was explained that HOME-ARP funds can be used for Production or Preservation of rental Affordable Housing. Additionally, HND explained that these are permanent rental units that will be paid for and/or subsidized by the HOME-ARP funds for fifteen (15) years or longer depending on other subsidies in the project. The estimated maximum award per project was \$3 million. HND anticipated that project developers will rely on Low-Income Housing Tax Credit (LIHTC) financing, state and local HOME ARP funds, Housing Trust Fund grants, project-based vouchers, project-based rental assistance, operating cost reserves, state or local sources, or a combination of these and other resources to create feasible HOME-ARP projects and maintain compliance with HOME-ARP requirements (Davis Bacon, Section 3, and Environmental Review

Records). The County posted the RFA and all addenda on the County's website. The workshop was available by telephone and virtually on the Zoom meeting platform.

On December 15, 2021, HND presented the draft HOME Allocation Plan for input at the Continuum of Care membership meeting. Local agencies and members of the Homeless Coalition of Polk County were given an overview and asked for input for the HOME ARP Allocation Plan. Agencies were informed of the RFP that had been published and where they could access the application to submit a request for funding. Both meetings were published in the Local Newspaper and posted on the Polk County website. The HCPC sent out emails to all members notifying them of the meeting.

Polk County HND will not administer the Multifamily Rental Projects directly.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Polk County HND will manage the multifamily projects with the assistance of Neighborhood Lender Partners (NLP). Polk County HND intends to enter a tri-party agreement with NLP, the developer, and Polk County Government. Funds were not provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP. Each member of the tri-party agreement's role and responsibilities in administering the HOME-ARP program are described below:

A. Polk County – The Polk County Housing & Neighborhood Development Office (HND) will oversee the development of rental units for HOME-ARP qualifying populations. Working with Neighborhood Lending Partners (NLP) these funds will be provided as a low interest loan to support the Low-Income Housing Tax Credit projects in Polk County. HND will monitoring annually throughout the affordability period. Polk County HND will complete all HUD reporting in IDIS and the CAPER. NLP and the County shall follow the guidelines that are contained in the HOME-ARP Notice.

B. Neighborhood Lending Partners (NLP) - The County has determined the most efficient method to provide the required Project Loan underwriting, closing, administration, disbursement, servicing, management, monitoring, and reporting services is the engagement of NLP, an entity experienced in underwriting subordinate county loans for multi-family affordable developments, providing construction loans to build new and preserve existing multi-family affordable housing developments with LIHTCs and other subsidies, monitoring project property and rental compliance, and providing required project status reports and annual reviews.

C. Project Developer - the Developer is the owner of certain real property, on which it intends to develop an affordable rental housing project with units to be set aside for qualifying households or low-income households in accordance with the HOME ARP Requirements. The Florida Housing Finance Corporation ("FHFC") has approved an award of Low-Income Housing Tax

Credits to the Developer for the Project.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding Amendment No. 2

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$50,000		
Acquisition and Development of Non-Congregate Shelters	0		
Tenant Based Rental Assistance (TBRA)	\$150,000		
Development of Affordable Rental Housing	\$ 4,800,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 101,519	2 %	15%
Total HOME ARP Allocation	\$ 5,105,519		

Additional narrative, if applicable:

Polk County HND prioritized funding activities that contribute to the priority needs, as the Housing Needs Inventory Gap Analysis Tables also supported these priorities for the qualifying populations. The feedback received from nonprofit service providers strongly indicated that the greatest need and largest estimated gap for the Qualifying Populations they serve is availability of affordable rental housing units, followed by rental assistance and development of non-congregate shelter units. HND utilized this feedback to plan the use of HOME-ARP Funding.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

HOME-ARP funds must be used to primarily benefit the qualifying populations through the four eligible activities: TBRA, development and support of affordable housing, provision of supportive services, and acquisition and development of non-congregate shelter (NCS) units. The characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis demonstrated the greatest needs are development of affordable rental housing units, with the need for more rent subsidy and acquisition and development of non-congregate shelter units following. The use of HOME-ARP funds for new construction of rental units will begin to close the gap by 383 units total of a deficit of 24,135 affordable rental units needed to serve the low to very/extremely low-income population of Polk County. The development of affordable rental housing addresses and targets characteristics associated with housing instability and supports households at-risk of homelessness.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

HOME- ARP Allocation Plan Amendment No. 2

Subrecipient- Homeless Coalition of Polk County	Total Cost	HOME Units	% of ARP Funding
Supportive Services	\$50,000		
Tenant Based Rental Assistance (TBRA)	\$150,000	5	
	\$200,000		4%

RFP 22-128, HOME ARP (American Rescue Plan) Funds supporting Multifamily Rental Development Projects

Proposer	Total Cost	Request	Total Units	HOME Units	% of ARP Funding
SHAG Grove Manor-Winter Haven Housing Authority	\$20,999,484	\$2,300,000	82	11	10.95%
Blue Sky Communities/Florence Place	\$22,331,402	\$2,000,000	88	11	8.96%
Blue Sky Communities/Swan Landing	\$21,721,258	\$500,000	88	3	2.30%
	\$65,052,144	\$4,800,000	258	25	

Proposer	Total Cost	Request	Total Units	SHIP Units	% of SHIP Funding
Blue Sky Communities/Swan Landing	\$21,721,258	\$500,000	88	3	100.0%
NuJak Companies, Inc.-Lakeland Housing Authority	\$19,006,277	\$1,000,000	125	10	3.7%
	\$19,506,277	\$1,200,000	125	13	
GRAND TOTAL	\$84,558,421	\$6,000,000	383	38	

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

As of October of 2024 Amendment No. 2 will add a Tenant Based Rental Assistance (TBRA) Project to this plan (TBRA). This project will provide rental assistance for approximately five (5) clients from the qualified populations. Rental assistance will be provided for two years. Support services will be provided in the form of housing counseling and homeless prevention services such as case management. The case manager's salary and travel to apartments to complete rental applications and to work with leasing managers is part of the Support services.

Polk County will provide HOME-ARP funding to address the housing and service needs of the County's most vulnerable populations and achieve the goal of production and preservation of affordable housing and supportive services. It is our goal to increase affordable rental housing to the qualifying populations, including very low-income households at or below 30% AMI and households at risk of homelessness with incomes of 30-50% AMI. The goal will address the affordable rental housing unit deficit and relieve the cost burden disproportionately felt by the qualifying populations. It will support the provision of decent housing by increasing the availability and accessibility of affordable housing. The County will address the priority need by funding the new construction of HOME ARP rental affordable housing units within Low Income Housing Tax Credit projects. Upon completion of four multifamily developments, the projected unit goal is 25 HOME ARP units for the qualifying populations, 25 HOME ARP units and 13 State Housing Initiatives Partnership Program (SHIP) units. The rest of the units which will be part of Low-Income Housing Tax Credit projects total 345.

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Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

One project out of the four (4) multifamily developments to be assisted with HOME-ARP funds will have a preference for the elderly at risk of homelessness, or senior apartments. Developments with the Elderly Demographic priority were considered high on the needs analysis. Additionally, an increased stock of available and affordable housing units would alleviate this unmet need. One of the four (4) projects Polk County is supporting will create 11 units for qualifying populations for permanent housing for older persons.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The unmet needs for the populations at risk of homelessness include resources for rental or utility deposit assistance and development of affordable rental housing units. The housing problems affecting most renters and homeowners in Polk County are housing cost burden and severe cost burden. Elderly households are at greatest risk of experiencing cost burden. These households living in the County require access to financial support to obtain and maintain housing. Housing units for homeless persons that qualify as 62 and older is an identified need in the gaps analysis for individuals.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Polk County HOME-ARP funds will be leveraged with three (3) other multifamily developments. These developments were awarded Low Income Housing Tax Credits (LIHTC) from the Florida Housing Finance Corporation (FHFC). As part of the application approval process each development features the following resident programs, adult Literacy Training/Classes, Employment Assistance Program, and Financial Management Program. Polk County is supporting an additional 27 units for the other qualifying populations.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME- ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP

rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

Not applicable as Polk County HND does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Polk County HND does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Polk County HND does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.*** Polk County HND does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

- ***Other requirements in the PJ's guidelines, if applicable:***

Not applicable.

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