GWINNETT COUNTY, GEORGIA



2014 ANNUAL ACTION PLAN

PREPARED FOR SUBMISSION TO THE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT



Table of Contents

AP-05 Executive Summary	
PR-05 Lead & Responsible Agencies	
AP-10 Consultation	11
AP-12 Participation	18
AP-15 Expected Resources	22
AP-20 Annual Goals and Objectives	24
AP-35 Projects	29
AP-50 Geographic Distribution	34
AP-55 Affordable Housing	39
AP-60 Public Housing	
AP-65 Homeless and Other Special Needs Activities	
AP-75 Barriers to Affordable Housing	48
AP-85 Other Actions	50
AP-90 Program Specific Requirements	
Appendix A: SF 424s	
Appendix B: Certifications	
Appendix C: Citizen Participation	83

Executive Summary

AP-05 Executive Summary

Gwinnett County, Georgia is a maturing suburban community in the northeastern portion of the Atlanta, Georgia metropolitan area and has been one of the fastest growing counties in the nation, having grown from approximately 72,000 persons in 1970 to more than 837,000 persons in 2013.

Since 1986 Gwinnett County, has received direct assistance under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program as an entitlement community. Gwinnett County is also a participating jurisdiction under the HOME Investment Partnerships Program (HOME), as well as a formula grantee under the Emergency Solutions Grant (ESG). Funds for these programs must be expended within the County for participants who meet applicable eligibility criteria and for eligible activities as outlined by program regulations.

Purpose of the Consolidated Plan and Annual Action Plan:

As a recipient of federal grant funds, Gwinnett County is required by HUD to produce a Consolidated Plan every five years and an Annual Action Plan every year. These documents serve as the application for funding for the following federal entitlement programs that serve low-income individuals and/or families:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)

Gwinnett County's 2014 Annual Action Plan reflects the final year of the five year Consolidated Plan to carry out previously identified priorities. These priority needs were established through a collaborative process with citizens, public interest groups, and other stakeholders in Gwinnett County. The proposed activities seek to address certain significant housing and community development needs for low and moderate income residents. This document includes narrative responses to specific questions that grantees must respond to in order to be compliant with the Consolidated Planning Regulations at 24 CFR part 91.

Summary of the objectives and outcomes identified in the Plan Needs Assessment:

The following is an outline of the strategic priorities identified in the 2010-2014 Consolidated Plan.

2010-2014 Consolidated Plan Goals

The strategic plan component of the Consolidated Plan contains three main elements [homeless, housing, and community development], which are the primary topics addressed by the Consolidated Plan. Each major component includes a presentation of data and data analysis, goals and priority objectives, needs, strategies and techniques, and resources. All activities for funding under the

Consolidated Plan in the Action Plans for each of the years 2010-2014 address these goals and their respective priority objectives.

HOMELESS GOAL:

> Increase Housing Options for Homeless and Near-homeless Individuals and Families

Priority Objectives:

- Support non-profit, private and public entities that provide housing opportunities for at-risk populations
- Address the emergency shelter needs of homeless persons, including individuals, families, adults, and youth
- Provide outreach to homeless persons for assessment of their individual needs
- Address the transitional housing needs of homeless persons, including individuals, families, adults, and youth
- Help homeless persons make the transition to permanent housing and independent living
- Help prevent homelessness of low-income individuals and families

HOUSING GOALS:

- Increase Access to Affordable Housing for Low and Moderate-income Persons.
- ➤ Eliminate Substandard Housing for Low and Moderate-income Individuals, Families, and Households
- ➤ Increase Housing and Supportive Services for Individuals and Families with Special Needs

HOUSING GOAL #1: Increase Access to Affordable Housing for Low and Moderate-income Persons Priority Objectives:

- Principal Reduction [Downpayment Assistance] & Closing Cost Reduction for first-time homebuyers
- Rehabilitation of existing housing for first-time home buyers
- Home Buyer Education/Counseling
- New construction of affordable housing for first-time home buyers
- Reduction of acquisition and development costs for affordable single family housing
- Reduction of acquisition and development costs for affordable multi-unit housing
- Encourage private and non-profit developers by funding acquisition, development and rehabilitation activities

HOUSING GOAL #2: Eliminate Substandard Housing for Low and Moderate-income Individuals and Families and Households

Priority Objectives:

- Rehabilitate owner-occupied homes
- Energy Conservation and Weatherization for single- and multi-unit housing
- Home Owner Education

- Replacement construction for non-feasible rehabilitation
- Hazardous Materials Abatement/Removal [Lead/asbestos]
- Rehabilitate multi-unit homes
- Housing Code [Property Maintenance] Activities

HOUSING GOAL #3: Increase Housing and Supportive Services for Individuals and Families with Special Needs

Priority Objectives:

- Support the efforts of public and private non-profits to create additional housing options for special needs clientele
- Support the efforts of public private non-profits to acquire, construct, or rehabilitate housing for disabled persons, including persons with AIDS/HIV and persons who are diagnosed with substance abuse and/or physical or mental disabilities.
- Support the efforts of public and private non-profits to acquire and/or construct transitional housing for special needs individuals
- Financial Assistance with housing for special needs populations

COMMUNITY DEVELOPMENT GOAL:

Increase the capacity of public facilities and public services to improve the social, economic, by acquiring, constructing, or rehabilitating public facilities, revitalizing older areas of the County, providing equipment purchased through public services activities, and providing overall program administration and management.

Long Term Priority Objectives:

- PUBLIC FACILITIES: To provide for the acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements to: (1) meet health and safety regulations, and
 (2) upgrade and maintain the viability of neighborhoods where low- and moderate-income families reside; and, (3) revitalize older areas of the County.
- PUBLIC SERVICES: To provide the resources necessary to improve the community's public services, including, but not limited to, employment, crime prevention, childcare, physical and mental health, drug abuse, education, energy conservation, transportation, care for the elderly, welfare and recreational needs.
- ADMINISTRATION/PLANNING/MANAGEMENT: To provide the administrative structure to conduct community development, housing, and homeless activities by planning, implementing, monitoring and evaluating, community development, housing and homeless programs.

Short Term Priority Objectives:

 To improve existing deteriorated public facilities and infrastructure in low- and moderateincome areas to meet health and safety standards, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.

- To construct new public facilities and infrastructure in low- and moderate-income areas now lacking such facilities, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.
- To construct, acquire, and/or renovate public facilities to meet the needs of special population groups such as the elderly, persons with disabilities, homeless persons, and persons suffering from various types of abuse.
- To provide funding, support, or technical assistance to assist in the implementation of programs
 for special population groups such as the elderly, persons with disabilities, homeless persons,
 and persons suffering from various types of abuse.
- To provide funding, support, or technical assistance to private non-profit and public agencies meeting the public service needs of the County's low and moderate-income population.
- To encourage the development of and maximize the opportunities for minority and femaleowned businesses.
- To provide the administrative structure for the planning, implementation, and management of the Community Development Block Grant Program, the Emergency Shelter Grants Program, the HOME Program, the American Dream Downpayment Initiative, and other housing, community development and homeless programs.

Evaluation of past performance:

Each year, Gwinnett County reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance Evaluation Report (CAPER). Gwinnett County has successfully targeted funding to benefit low and moderate income persons and communities. The goals and projects identified in this Action Plan were developed using past strategies that have been proven successful and those that needed to be revised.

Summary of citizen participation process and consultation process:

Citizen participation requirements are a part of the HUD regulations governing the preparation of the Consolidated Plan [see 24 CFR Part 91.105]. Each entitlement grantee must meet minimal citizen participation requirements, including the preparation of a Citizen Participation Plan, which explains the grantee's methodology for involving citizens in the local program planning and project/activity implementation process.

The Gwinnett County Community Development Program prepares/updates its Citizen Participation Plan as a part of its Consolidated Plan, every 5 years. The process for involving citizens may change from time-to-time, as described in the Citizen Participation Plan approved by the Gwinnett County Board of Commissioners, and as required by HUD for consistency with changes in the citizen participation requirements of 24 CFR Part 91.

To solicit citizen input in the development of Action Plan 2014, Gwinnett County hosted two Needs Assessment Public Hearings on Wednesday, November 28, 2012 and Wednesday, May 15, 2013. Both

Needs Assessments included a 30 day public comment period that encouraged citizens to participate in identifying projects for future funding.

In compliance with its Citizen Participation Plan Gwinnett County's Action Plan 2014 was submitted for public comment from Friday, August 9, 2013 – Monday, September 9, 2013 and included a Public Hearing held on Wednesday, September 4, 2013 at 6:00 P.M. at the Gwinnett Justice and Administration Center in Lawrenceville.

In an attempt to increase public participation, the County actively maintains communication with local nonprofits and housing developers and will adhere to the following actions to improve citizen participation.

Actions to improve participation

- Ensure each meeting is held at a convenient time and location for residents of the County; provide ADA accessibility for all persons with disabilities; and provide interpretation for limited English proficiency clientele.
- Use electronic and print media to solicit public participation. This includes sending mass emails to County and Municipal employees, nonprofit organizations, and local businesses.
- Review of all citizen comments and incorporation of such comments in the Action Plan, as applicable.
- Analyze the impact of Action Plan program activities on neighborhood residents, particularly low and moderate income residents.
- Conduct Needs Assessments and appropriate on-site visits to each proposed project before including it in the Proposed Consolidated Plan.

Summary of public comments:

Public comments received from the Needs Assessment Public Hearings in November 2012, May 2013, as well as the Proposed Action Plan 2014 Public Hearing held in September 2013, identified a number of needs throughout Gwinnett County.

- 1. Homeowner Housing Rehabilitation was among the most popular topic discussed by attendees, as well as the needs for variety of public services and public facility projects provided throughout the County.
- 2. Hope Clinic, Africa's Children's Fund, The Center for Pan Asian Community Services, the King David Community Center, and Straight Street Family Center discussed the need for medical and therapeutic services for specific populations such as senior citizens, victims of domestic violence, refugees, and diabetic and heart-condition patients.

- 3. Boys and Girls Club of Metro Atlanta and the Gwinnett County Department of Community Services discussed the need for special transportation, equipment purchases, and building renovations needed for the underserved population of Gwinnett County's senior citizens and low-income children.
- 4. The Center for Pan Asian Community Services also discussed the need for housing counseling services for Gwinnett County citizens, especially those with language barriers.
- 5. The Gwinnett County Department of Transportation discussed the need for sidewalk construction on Pirkle and Harbins Road in the Norcross Area.
- 6. Representatives from Gwinnett County's Health and Human Services Department requested renovations to the Lawrenceville Senior Center, the Buford Senior Center, and the Norcross Human Services Center.
- 7. Representatives from Gwinnett County public service departments discussed the need for new fire stations, as well as needs from the Quality of Life sector of the Police Department in reference to Homeowner Housing Rehabilitation.
- 8. Representatives from the Good Samaritan Health Center discussed the need for renovations to their facility to better serve Gwinnett County's citizens.

Summary of comments or views not accepted and the reasons for not accepting them:

All comments provided through the Citizen Participation Plan were accepted and reviewed.

Summary of the FY2014 Action Plan:

This Annual Action Plan describes specific projects in which these funds will be utilized to carry out previously identified priorities established in the Gwinnett County 2010-2014 Consolidated Plan. Using CDBG, HOME, and ESG funds and by leveraging other public and private investment, Gwinnett County will:

- 1. Increase housing options for homeless and near-homeless individuals and families.
- 2. Increase access to affordable housing for low- and moderate-income persons.
- 3. Eliminate substandard housing for low-and moderate-income individuals and families.
- 4. Increase housing and supportive services for individuals and families with special needs.
- 5. Increase the capacity of public facilities, revitalizing older areas of the County, providing equipment purchased through public services activities, and providing overall program administration and management.

PR-05 Lead & Responsible Agencies

Agency/entity responsible for preparing/administering the Consolidated Plan:

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

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency	
Lead Agency	GWINNETT COUNTY	Department of Financial	
		Services	

Narrative

Supervised by the Gwinnett County Department of Financial Services, the Community Development Program office manages grant programs awarded to the County by the U.S. Department of Housing and Urban Development (HUD) by providing the resources for decent, safe, and affordable housing, a suitable living environment, and expanded economic opportunities. Funding for these HUD grant programs is awarded by the Gwinnett County Board of Commissioners to qualifying nonprofit and government organizations through an annual competition process.

The Community Development Program Office researched, and prepared the Consolidated Plan that provides a comprehensive strategy that addresses the County's housing and community development needs for the use of CDBG, HOME and ESG Program funds.

The Community Development Program is fully staffed and managed by W. Frank Newton, Inc., a program management firm that specializes in HUD Grant Programs and has been managing all facets of Gwinnett County's HUD Programs since 1986.

or

Consolidated Plan Public Contact Information:

Public concerns, issues, or comments regarding the Consolidated Plan are directed to:

Ms. Tanikia Jackson, Grants Manager

Gwinnett County Department of Financial Services

75 Langley Drive

Lawrenceville, GA 30046-6935

Phone: (770) 822-7850 FAX: (770) 822-7840 TDD: (770) 822-7875

email: tanikia.jackson@gwinnettcounty.com

Ms. Shannon Candler, Director

Gwinnett County Community Development Program

[Staffing Provided by W. Frank Newton, Inc.,]

446 W. Crogan Street, Suite 275

Lawrenceville, Ga. 30046-2539

Phone: (678) 518-6008 FAX: (678) 518-6071

email: gchcd@gwinnettcounty.com

AP-10 Consultation

Introduction:

The Emergency Solutions Grant Program is designed as the *first step* in a continuum of assistance to prevent homelessness and to enable the homeless population to move steadily toward independent living. The <u>Continuum of Care</u> model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. The U.S. Department of Housing and Urban Development is committed to the use of the Continuum of Care model and believes that the best approach to alleviate homelessness is through a community based process that provides a comprehensive response to the diverse needs of homeless individuals. As a participant in Georgia's Balance of State Continuum of Care (administered by the Georgia Department of Community Affairs), Gwinnett County relies on the Continuum of Care model as a tool for attacking and solving the problem of homelessness.

The fundamental components of a Continuum of Care system are:

- A system of outreach, engagement, and assessment for determining the needs and conditions of individuals or families who are homeless and the necessary support to identify, prioritize, and respond to persons who are chronically homeless.
- o Emergency shelters with appropriate supportive services to help ensure that homeless individuals and families receive adequate emergency shelter and referral to necessary service providers or housing search counselors.
- o Rapid re-housing to help persons with lower barriers who are homeless successfully move to, and stay in, conventional housing units.
- o Transitional housing with appropriate supportive services to help homeless individuals and families who need more assistance to prepare to make the transition to permanent housing and independent living.
- Permanent housing, or permanent supportive housing, to help meet the long-term needs of homeless individuals and families.
- Prevention strategies, which play an integral role in a community's plan to eliminate homelessness by effectively intervening for persons at risk of homelessness or those being discharged from public systems – e.g., corrections, foster care, mental health, and other institutions – so they do not enter the homeless system.

Summary of coordination between service providers:

The Gwinnett Coalition for Health and Human Services (hereinafter referred to as the Coalition) serves as the linkage among all the Gwinnett entities which serve homeless persons or near-homeless persons in need of various types of assistance. Serving as the facilitator for activities affecting housing and services for low-income and homeless citizens, the Coalition brings together all the public and private entities providing services to persons with housing, emergency assistance, physical health and mental health, and similar needs. Additionally, the Coalition provides a hotline for citizens through which they

can obtain referrals to appropriate service providers. The Gwinnett Coalition for Health and Human Services works closely with Gwinnett County through the Consolidated Plan development process.

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

Gwinnett County is a member of the Georgia Balance of State Continuum of Care operated by the Georgia Department of Community Affairs. All ESG activities funded by Gwinnett County must address the needs identified in the Balance of State Continuum of Care [these needs are also reflected in the Gwinnett County Consolidated Plan] and must pursue the Homeless Goal(s) and one or more of the priority objectives to address the needs of the homeless. Gwinnett County Community Development Program [GCCDP] staff consults with the Georgia Department of Community Affairs [GA DCA] staff to ensure collaboration of its efforts to provide homeless solutions. In the sections detailed below, Gwinnett County describes how it consults with the Georgia Balance of State Continuum of Care on: (1) Determining how to allocate ESG funds for eligible activities; (2) Developing the performance standards for activities funded under ESG; and (3) Developing funding, policies, and procedures for the operation and administration of the Homeless Management Information System [HMIS].

Consultation – Determining How to Allocate ESG Funds for Eligible Activities

GCCDP staff participated in DCA hosted conference calls to discuss and determine the Continuum's priorities for allocating ESG program funds. Through this process each entitlement community was able to highlight the priorities for their community. Gwinnett County prioritized the ESG activities needed for its community as follows: (1) Emergency Shelter (facility, scattered site or hotel/motel voucher); (2) Homelessness Prevention; (3) Transitional Housing; (4) Rapid Re-Housing; (5) Supportive Services attached to shelter populations; (6) Transportation; (7) Child Care Services; (8) Employment Services; (9) Legal Services; (10) Health Services; (11) Educational Services; (12) Substance Abuse Services; (13) Mental Health Services; and (14) Street Outreach.

Additionally, GCCDP staff shared that a particular population, children who are members of homeless families, is of increased priority for its entitlement area. The level of need exceeds the capacity of the largely faith-based service providers working to serve this population. The homeless population in Gwinnett is largely short-term; however, the length of the recovery from the economic recession could alter this pattern. The continued overall growth of population, coupled with changing demographics, is increasing the number of families who are homeless or in danger of becoming homeless in Gwinnett County. Unfortunately, the trend continues upward.

Through the consultation process it was determined that Gwinnett County should allocate its ESG program funds for eligible activities meeting the priority needs in the entitlement area. Likewise, the GA

Department of Community Affairs would address Gwinnett County priorities when allocating funding to qualifying service providers operating in Gwinnett that applied for state funds.

Consultation – Developing the Performance Standards for Activities Funded Under ESG

Performance standards provide a measure for ESG recipients to evaluate the effectiveness of each ESG service provider in the areas of: (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and (d) Reducing clients' housing barriers or housing stability risks.

A draft version of Gwinnett County's performance standards for service provider performance was submitted to GA DCA staff on Monday, April 9, 2012 for their input and guidance in ensuring consistency with the Balance of State Continuum of Care. Suggestions made by the GA DCA staff were incorporated into the performance standards. The Gwinnett County performance standards for ESG funded activities are reflective of the Continuums' needs while meeting entitlement area priorities. These performance standards will be reviewed annually and input will be gathered by GA DCA prior to the implementation of changes.

<u>Consultation – Developing Funding, Policies, and Procedures for the Operation and Administration of Homelessness Management Information System (HMIS)</u>

Through the enactment of the HEARTH Act of 2009, HMIS participation is now a statutory requirement for all ESG recipients and subrecipients. Gwinnett County and the Balance of State Continuum of Care recognize that there numerous benefits of participating in HMIS. Specific benefits to homeless persons include streamlined referrals, coordinated intake and assessment and coordinated case management. Case managers benefit from case planning and management tools, eligibility determination assistance, and simplified reporting. Through the use of HMIS, service provider directors and program managers can readily track client outcomes, review the coordination of services, simplify reporting for agency stakeholders, and export data to assist in program design. Entitlement communities and Continuums of Care benefit from HMIS by having a tool in which to measure performance and to identify service gaps and the extent of homelessness within its community.

Pathways is the assigned HMIS provider to the Southeast region. Consultation with the Continuum of Care determined that the Balance of State would be a resource, but ultimately, Gwinnett County would be responsible for HMIS Administration for its entitlement community. To that end, Gwinnett is utilizing the Continuums' policies and procedures for operating and administering HMIS as a framework to ensure consistency. Gwinnett County will continue to work with the Continuum to establish joint expectations, requirements, and agreements for user participation. Gwinnett County will ensure that data on all persons served and all activities assisted under ESG are entered into Pathways in accordance with HUD's standards on participation, data collection, and reporting for HMIS. Victim service providers will be required to use a comparable database (Alice) to meet HMIS requirements. When necessary and available, ESG funds will be used to cover the costs of HMIS.

Gwinnett County is currently working with Pathways staff on contract development and is actively participating in Pathways User Group meetings. The Pathways User Group meetings allow users to share successes and challenges in implementing HMIS and address any unmet needs. Gwinnett County and the Balance of State Continuum of Care are awaiting additional guidance from HUD on the specific ESG requirements for HMIS and will continue to utilize the 2010 HMIS Data Standards until further guidance is provided.

Table 1 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	RAINBOW VILLAGE
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
2	Agency/Group/Organization	THE IMPACT! GROUP
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
3	Agency/Group/Organization	TRAVELER'S AID OF METROPOLITAN ATLANTA
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
4	Agency/Group/Organization	GWINNETT COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services-Health
		Other government - County
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
5	Agency/Group/Organization	THE PARTNERSHIP FOR COMMUNITY ACTION
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
6	Agency/Group/Organization	LATIN AMERICAN ASSOCIATION, INC
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
7	Agency/Group/Organization	Gwinnett County Community Development Program
	Agency/Group/Organization Type	Housing
		Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
8	Agency/Group/Organization	LAWRENCEVILLE HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
9	Agency/Group/Organization	Norcross Cooperative Ministry
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
10	Agency/Group/Organization	CENTER FOR PAN ASIAN COMMUNITY SERVICES, INC.
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.
11	Agency/Group/Organization	PARTNERSHIP AGAINST DOMESTIC VIOLENCE
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What	The strategy in Gwinnett County's mission to reduce
	are the anticipated outcomes of the consultation or areas for improved	homelessness is to help each individual move toward
	coordination?	the goal of self-sufficiency.

AP-12 Participation

Summarize citizen participation process and how it impacted goal-setting

In addition to Gwinnett County's Consolidated Plan (2010-2014), Analysis of Impediments, and prior years Needs Assessment comments - application review scores, project implementation details, and current Needs Assessment public comments were taken in consideration when drafting a spending plan for the FY 2014 Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) entitlements from the U.S. Department of Housing and Urban Development (HUD).

To solicit citizen input in the development of Action Plan 2014, Gwinnett County hosted two Needs Assessment Public Hearings on November 28, 2012 and May 15, 2013. Both Needs Assessments included a 30 day public comment period that encouraged citizens to participate in identifying projects for future funding.

In compliance with its Citizen Participation Plan Gwinnett County's Action Plan 2014 was published/offered for public comment for a 30 day period [August 9, 2013 – September 9, 2013] and included a Public Hearing held on September 4, 2013 at 6:00 P.M. at the Gwinnett Justice and Administration Center in Lawrenceville.

Areas of need identified at hearings were provided to the application review committee and were utilized when developing funding recommendations.

Citizen Participation Outreach

Table 2 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	The public meeting held November 28, 2012 hosted representatives from twelve (12) public service organizations, non-profits, and County departments, as well as community advocates. Attendees were encouraged to comment on community needs to be addressed with 2014 funding.	Summary of comments on page 7.	All comments were accepted by the Gwinnett County Community Development Program Office.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	The public meeting held May 15, 2013 hosted representatives from eight (8) 2014 funding request applicant organizations, nonprofits, and County departments. Gwinnett County Community Development Program staff discussed the number of applications received for the FY 2014 funding cycle. Attendees were encouraged to comment on applications received and discuss community needs that were not addressed by applicants.	Summary of comments on page 7.	All comments were accepted by the Gwinnett County Community Development Program Office.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	The public meeting held September 4, 2013 hosted representatives from three (3) organizations, non-profits, and County departments who applied for 2014 funding during the application cycle in early 2013. Also in attendance were nine (9) community representatives. Attendees were encouraged to discuss proposed funding recommendations for FY 2014.	Summary of comments on page 7.	All comments were accepted by the Gwinnett County Community Development Program Office.	

AP-15 Expected Resources

Introduction

Gwinnett County will receive the following allocations: CDBG (\$5,098,532); HOME (\$1,505,743); and ESG (\$397,141). The CDBG and HOME Programs also expect to receive approximately \$100,000 in program income [\$50,000 for the CDBG Program and \$50,000 for the HOME Program, respectively] bringing the total to \$7,101.416.

Table 2 – Expected Resources – Priority Table

			Ex	pected Amoun	t Available Yea	r 5	Expected	
Program	Source of funds	Uses of Funds	Annual Allocation	Estimated Program Income	Prior Year Resources	Total	Amount Available Reminder of Con Plan	Leveraging Description
CDBG	Public – Federal	 Acquisition Admin and Planning Economic Development Affordable Housing Public Improvements Public Services 	\$5,098,532.00	\$50,000.00	n/a	\$5,098,532.00	\$10,400,452.71	CDBG funds used throughout the County will leverage other federal, local and private funds.
HOME	Public – Federal	AcquisitionHomebuyer AssistanceHomeowner RehabNew ConstructionRehab	\$1,505,743.00	\$50,000.00	n/a	\$1,505,743.00	\$3,653,112.49	HOME funds will leverage other federal, local, and private funds. Match requirements will be met by requiring will be met by requiring organizations to demonstrate at least 25% match.
ESG	Public – Federal	Financial AssistanceOvernight shelterRapid re-housingRental AssistanceTransitional Housing	\$397,141.00	n/a	n/a	\$397,141.00	\$599,850.37	ESG match requirements will be met by requiring will be met by requiring organizations to meet a 100% match of all funds received.

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

In an attempt to offset any further reductions in funding amounts, the County will continue to investigate and make application for additional funding streams that are consistent with the goals of the Consolidated Plan. Gwinnett County will also work with partner organizations to encourage leveraging of available funding sources and build capacity.

The HOME program requires a 25% match of the total HOME funds drawn down for project costs. This match requirement will be met by requiring subrecipients to provide at least 25% match on projects, by the value of sponsorships from local businesses, waived County fees, donated land or improvements, volunteer hours, donated materials, or by other eligible methods as provided in the HOME regulations. Gwinnett County HOME subrecipients submit a match log that identifies the sources of match funds from each fiscal year. Historically, match amounts for HOME subrecipients have far exceeded the 25% annual contributions requirements stipulated by HOME program regulations.

The ESG program requires a 100% match for the total amount of ESG funds drawn down. Gwinnett County requires ESG subrecipients to provide a dollar for dollar match by the value of volunteer hours, private donations, salary not covered by ESG, other grant funding, in-kind donations, or by other eligible methods as provided in the ESG regulations.

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

The County will not use any publicly owned land or property to address the need identified in the 2014 Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Table 3 - Goals Summary Information

Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
Increase Housing Options for Homeless and Near-homeless Individuals and Families	2014	2014	Homeless	Homeless	\$397,141.00	Number of Persons Served
Increase Access to Affordable Housing for Low and Moderate-income persons	2014	2014	Housing	Housing	\$1,575,743.00	Number of Persons Served
Eliminate Substandard Housing for Low and Moderate-income Individuals and Families	2014	2014	Housing	Housing	\$273,000.00	Number of Persons Served
Increase Housing and Supportive Services for Individuals and Families with Special Needs	2014	2014	Housing	Housing	\$96,000.00	Number of Persons Served
Increase the capacity of public facilities and public services to improve the social, economic by acquiring, constructing, or rehabilitating public facilities, revitalizing older areas of the County, providing equipment purchased through public services activities, and providing overall program administration and management	2014	2014	Non-Housing Community Development	Non-Housing Community Development	\$4,455,532.00	Number of Persons Served

Estimated CDBG Budget and Annual Goals

		Community	Development Block Grant (CDBG)		
Eligible Activities	Allocation	Consolidated	Needs Addressed	Annual	Performance
	Budget	Plan Goal		Goal	Indicator
Administration	\$450,000	All	N/A	N/A	N/A
UnProgrammed Funds	\$300,000	All	N/A	N/A	N/A
Housing: Owner Occupied Housing Rehabilitation – Grants/Administration	\$273,000	Increase Access to Affordable Housing	To eliminate substandard housing for low and moderate-income individuals, families, and households.	15	Housing Units
Housing: Downpayment Assistance Housing Services	\$70,000	Increase Access to Affordable Housing	Increase Access to Affordable Housing for Low and Moderate-income persons.	60	Households
Public Facilities: Infrastructure improvements, Neighborhood Facilities, Homeless Shelters	\$544,000	Increase Capacity of Public Facilities	To improve existing deteriorated public facilities and infrastructure in low- and moderate-income areas to meet health and safety standards, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.	52	Households
Public Facilities: Facility Acquisition/Construction/ Renovations for low- and moderate-income persons	\$1,348.378	Increase Capacity of Public Facilities	To construct new public facilities and infrastructure in low- and moderate-income areas now lacking such facilities, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.	4,325	Persons
Public Facilities: Facility Acquisition/Construction/ Renovations for homeless and special needs	\$1,348,378	Increase Capacity of Public Facilities	To construct, acquire, and/or renovate public facilities to meet the needs of special population groups such as the elderly, persons with disabilities, homeless persons, and persons suffering from various types of abuse.	4,483	Persons
Public Services: Low and Moderate Income population	\$188,938	Increase Public Services	To provide funding, support, or technical assistance to private non-profit and public agencies meeting the public service needs of the County's low and moderate-income population.	1,401	Persons
Public Services: Services for presumed benefit clientele	\$443,088	Increase Public Services	To provide funding, support, or technical assistance to assist in the implementation of programs for special population groups such as the elderly, persons with disabilities, homeless persons, and persons suffering from various types of abuse.	6,238	Persons
Total	\$5,098,532				

Estimated HOME Budget and Annual Goals

HOME Investment Partnerships Act (HOME)					
Eligible Activities	Allocation Budget	Consolidated Plan Goal	Needs Addressed	Annual Goal	Performance Indicator
Administration	\$150,574	All	N/A	N/A	N/A
Homebuyer: Downpayment Assistance	\$600,000	Increase Access to Affordable Housing for Low and to Affordable Housing Moderate-income persons.		60	Households
CHDO Reserve	\$225,863	Increase Access Increase Access to Affordable Housing for Low and Moderate-income persons. Housing		3	Households
CHDO Operating	\$50,000	Increase Access to Affordable Housing	Increase Access to Affordable Housing for Low and Moderate-income persons.	3	Households
Transitional Housing Program Services	\$239,653	Increase Access to Affordable Housing	Increase Access to Affordable Housing for Low and Moderate-income persons.	12	Households
Acquisition/Rehabiltation/Disposition of Single-Family (Attached/Detached) Homes	\$239,653	Increase Access to Affordable Housing	Increase Access to Affordable Housing for Low and Moderate-income persons.	4	Households
Total	\$1,505,743				

Estimated ESG Budget and Annual Goals

Emergency Solutions Grant (ESG)					
Eligible Activities	Allocation	Consolidated	solidated Needs Addressed		Performance
	Budget	Plan Goal		Goal	Indicator
Administration	\$29,785	All	N/A	N/A	N/A
Shelter Operations	\$238,280	Eliminating Homelessness	Providing support for emergency housing and supportive services for homeless families and individuals in Gwinnett through the ESG Program.	429	Persons
Rapid Re-Housing/ Homelessness Prevention	\$120,076	Eliminating Homelessness	Providing support for rapid re-housing and homelessness prevention for homeless and near homeless families and individuals in Gwinnett through the ESG Program.	732	Persons

Emergency Solutions Grant (ESG)					
Eligible Activities	Allocation	Consolidated	Needs Addressed	Annual	Performance
	Budget	Plan Goal		Goal	Indicator
HMIS Coordination	\$9,000	All	N/A	N/A	N/A
Total	\$397,141				

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b).

Action Plan 2014 allocates HOME Program funds to create affordable housing opportunities for extremely-low, low-income, and moderate-income families. An estimated 60 households will benefit from funding allocated to provide direct downpayment assistance for eligible properties located in the County.

A designated Community Housing Development Organization (CHDO) will provide affordable housing options and assistance throughout the County to meet the goals and objectives set forth for this Action Plan.

Atlanta Neighborhood Development Partnership (ANDP) is an active partner with Gwinnett County and looks to expand its presence within the jurisdiction. ANDP's focus is the promotion, creation and preservation of mixed income communities through direct development of affordable housing in Gwinnett County. Gwinnett County values ANDP's broad scope of expertise on development, construction, and policy in relation to the housing market.

AP-35 Projects

Introduction

The activities to be funded by Gwinnett County in FFY 2014 for Community Development Block Grant (CDBG) funds, Emergency Solutions Grants (ESG) funds, and Home Investment Partnership (HOME) Program funds are limited to serving 51% of AMI. Many projects are countywide activities carried out by Gwinnett County or by nonprofit organizations, while other projects are targeted to service areas within a number of cities which, participate in Gwinnett's Urban County grant program. The proposed project funding for Action Plan 2014 contains all CDBG, ESG, and HOME Program funds awarded by the Gwinnett County Board of Commissioners for funding from FFY 2014 grant agreements to be awarded by HUD.

HUD allows a maximum of 20% set aside for CDBG Planning and Administration. The administration cap is calculated as 20% of the FFY 2014 allocation (\$1,019,706.40). A total of \$450,000 is being allocated for this activity, representing approximately 9% of the grant award.

HUD allows a maximum of 15% set asides for CDBG eligible public services. The cap is calculated at 15% of the FFY 2014 allocation (\$764,779.80). Proposed public service projects total \$764,776 representing approximately 15% of the grant award.

A detailed listing of FFY 2014 activities are listed on the following page.

Table 4 – CDBG Projects Summary

FY 2014 Community Development Block Grant (CDBG)				
Organization	Project Description	Proposed Funding		
Administration				
Gwinnett County	Admin: Grant Administration (20% Cap = \$1,019,706.40)	\$ 450,000.00		
Housing				
Gwinnett County	Housing: Housing Rehabilitation Administration	\$ 93,000.00		
Gwinnett County	Housing: Housing Services for Homestretch Downpayment Assistance Program	\$ 70,000.00		
Gwinnett County	Housing: Homeowner Housing Rehabilitation Program	\$ 150,000.00		
Gwinnett County	Housing: Housing Rehabilitation Service Delivery Costs	\$ 30,000.00		
Public Facilities				
City of Buford	Public Facilities: Water System Improvements - South St	\$ 544,000.00		
GC Department of Community Services	Public Facilities: Building Renovations - Lawrenceville Senior Center	\$1,348,378.00		
GC Department of Transportation	Public Facilities: Sidewalk Construction - Pirkle and Harbins Rd	\$1,348,378.00		
Public Services				
Africa's Children's Fund	Public Services: Therapeutic Intervention Program Operating Costs	\$ 48,000.00		
Boys and Girls Club of Metro Atlanta	Public Services: Equipment Purchase - Mini Bus	\$ 50,000.00		
CredAbility	Public Services: Homelessness Support 2014 Program Operating Costs	\$ 36,750.00		
Good Samaritan Health Center of Gwinnett	Public Services: Healthcare Services Operating Costs	\$ 65,000.00		
Gwinnett Children's Shelter Inc.	Public Services: Shelter (Abused/Neglected Children) Operating Costs	\$ 102,438.00		
GC Department of Community Services	Public Services: Senior Services Center Operating Costs	\$ 86,500.00		
Hi Hope Service Center	Public Services: Community Access Program Operating Costs	\$ 96,000.00		
Hope Clinic	Public Services: Chronic Care Service Operating Costs	\$ 93,338.00		
The IMPACT! Group	Public Services: Housing Counseling Operating Costs	\$ 150,000.00		
Partnership Against Domestic Violence	Public Services: Domestic Violence Shelter Operating Costs	\$ 36,750.00		
Unprogrammed				
Gwinnett County	Unprogrammed Funds: Contingency Funding (10% Cap = \$509,853)	\$ 300,000.00		
	Total Proposed FY2014 CDBG Grant	\$5,098,532.00		

HOME funding for FFY 2014 is \$1,505,743.00. HUD allows up to 10% for HOME Program General Administration expenses. The administration cap is calculated as 10% of the FFY 2014 allocation (\$150,574,00). A total of \$150,574.00 is being allocated for this activity, representing 10% of the grant award. A detailed listing of FFY 2014 activities are provided below.

Table 5 – HOME Project Summary

PROPOSED FY2014 FUNDING - HOME INVESTMENT PARTNERSHIP GRANT [HOME] PROGRAM				
Organization	Project Description	Proposed Funding		
Gwinnett County	Estimated HOME Program Administration [Max 10% of grant]	\$	150,574.00	
Gwinnett County	HOME Program Homebuyer Downpayment Assistance	\$	600,000.00	
Atlanta Neighborhood Development Partnership	CHDO Operating Funds [Max 5% of grant - \$50,000]	\$	50,000.00	
Atlanta Neighborhood Development Partnership	CHDO Reserve Funds [Max 15% of Grant Funds)	\$	225,863.00	
Lawrenceville Housing Corporation	Transitional Housing Program Services	\$	239,653.00	
Lawrenceville Housing Corporation	Acquisition/Rehablitation/Disposition of Single-Family (Attached/Detached) Homes	\$	239,653.00	
	\$	1,505,743.00		

ESG funding for FFY 2014 is \$397,141.00. HUD allows a maximum of 7.5% set aside for ESG Planning and Administration. The administration cap is calculated as 7.5% of the FFY 2014 allocation (\$29,785.00). A total of \$29,785.00 is being allocated for this activity, representing 7.5% of the estimated grant award. A total of \$238,280.00 will be used for Emergency Shelter Operations, \$72,446.00 for Rapid Re-Housing, \$47,630.00 for Homelessness Prevention, and \$9,000 for Homeless Management Information System operations.

A detailed listing of FFY 2014 activities are listed on the following page/provided below.

Table 6 – ESG Project Summary

PROPOSED FY2014 FUNDING - EMERGENCY SOLUTIONS GRANT [ESG] PROGRAM				
Organization	Project Description	Proposed Funding		
Emergency Shelter				
Center for Pan Asian Community Services	Homeless - Emergency Shelter	\$ 35,656.00		
Norcross Cooperative Ministry	Homeless - Emergency Shelter	\$ 48,656.00		
Partnership Against Domestic Violence	Homeless - Emergency Shelter	\$ 48,656.00		
Rainbow Village, Inc.	Homeless - Emergency Shelter	\$ 41,656.00		
The Salvation Army - Gwinnett Corps	Homeless - Emergency Shelter	\$ 41,656.00		
ViewPoint Health	Homeless - Emergency Shelter	\$ 22,000.00		
Homelessness Prevention and Rapid Re-Ho	ousing			
Asian American Resource Center	Homelessness Prevention	\$ 2,200.00		
Latin American Association	Homelessness Prevention	\$ 19,415.00		
Norcross Cooperative Ministry	Homelessness Prevention	\$ 21,615.00		
The Salvation Army - Gwinnett Corps	Homelessness Prevention	\$ 4,400.00		
The Salvation Army - Gwinnett Corps	Rapid Re-Housing	\$ 32,823.00		
ViewPoint Health	Rapid Re-Housing	\$ 39,623.00		
HMIS Coordination				
Gwinnett County	Homeless Management Information System Costs	\$ 8,000.00		
Norcross Cooperative Ministry	Homeless Management Information System Costs	\$ 500.00		
ViewPoint Health	Homeless Management Information System Costs	\$ 500.00		
Administration				
Gwinnett County	Estimated ESG Program Administration [Max 7.5% of grant]	\$ 29,785.00		
	Total Proposed FY2014 ESG Grant	\$ 397,141.00		

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

Gwinnett County recognizes there are various and continuous needs for low and moderate income persons of the County that are met through the use of CDBG, HOME, and ESG funds. These needs include: access to affordable housing for low and moderate income persons; housing options for homeless and at-risk populations; increased capacity for public services; and addressing community development needs.

The County prioritizes it's allocations by ensuring that all proposed projects:

- Directly benefit low and moderate income persons or households as defined by HUD's Income Limit Guidelines based on the Atlanta-Sandy Springs-Marietta Metro Statistical Area (MSA), or
- Take place in an area where more than 51% of the population is lower income according to HUD Income Limits; or
- Eliminates slums and blight.

AP-50 Geographic Distribution

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

Historically, Gwinnett County allocates a large portion of its HUD Entitlement Grants to areas where lowand moderate-income persons are concentrated. These areas include the I-85 corridor (running north from DeKalb County to Hall County, encompassing I-85 and Buford Highway, and particularly the area in the vicinity of the City of Norcross). Another area with a high concentration of low-income persons is the area around and including the City of Lawrenceville. The Norcross and Lawrenceville area are also the portions of Gwinnett County where a significant number of immigrants have located. Many of these new residents of Gwinnett County are from low-income households. Recent Census (American Community Survey of 2005) information reports that 1 out of every 4 Gwinnett County residents was born in another country. (Total population estimate is 719,398 – foreign-born person estimate is 171,477 – 23.7%).

Many activities funded by Gwinnett County operate Countywide (e.g., homebuyer downpayment assistance, emergency housing for homeless, homeowner housing rehabilitation). However, due to the concentrations of low-income persons in the Norcross and Lawrenceville areas, it is expected that many of the persons/households assistance during 2014 will be in these sub-regions of Gwinnett County.

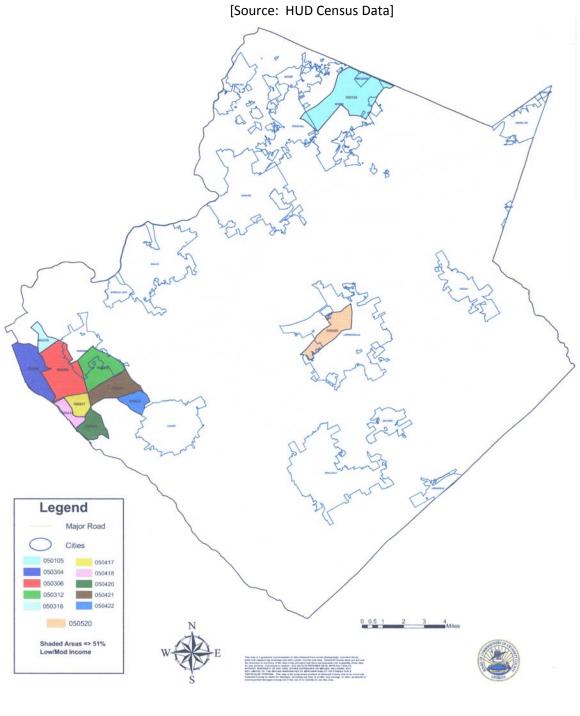
The following table summarizes the funding for 2014, geographically, identifies investment (target) areas, and displays the percentage of funds in these respective geographic areas of Gwinnett County.

Table 7 - Geographic Distribution

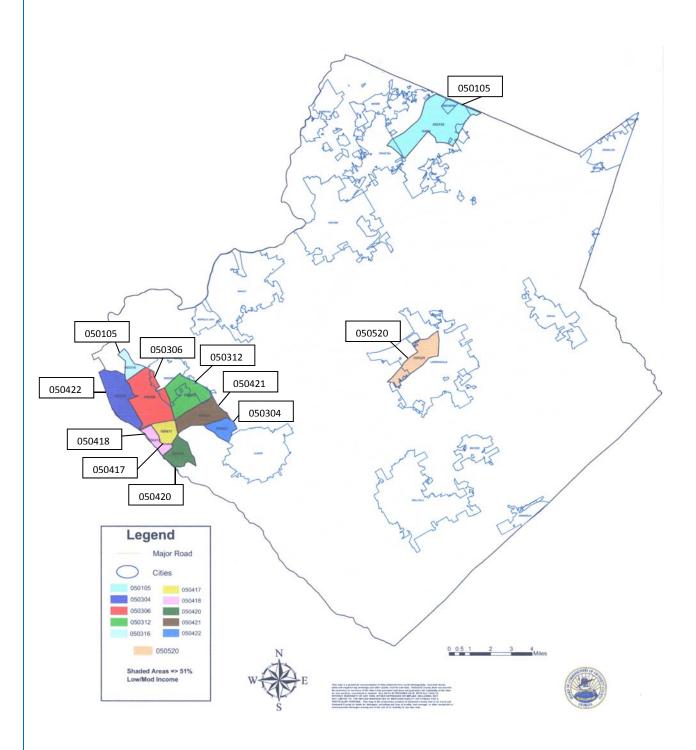
Target Area	Percentage of Funds		
County-wide	63%		
Census Tract 050105 (Buford)	13%		
Census Tract 050421 (Norcross)	6%		
Census Tract 050422 (Lilburn)	5%		
Census Tract 050520 (Lilburn)	13%		

Rationale for the priorities for allocating investments geographically.

Gwinnett County is an urban county that covers over 437 square miles which causes the low to moderate income population to be less concentrated as in most centralized cities. The County relies on widely accepted data such as American Community Survey, HUD low and moderate income summary data, and Federal Financial Institutions Examinations Council (FFIEC) data to determine areas throughout the community with concentrations of low and moderate income communities. Program resources are allocated County-wide based on low-mod areas which often coincide with areas of minority concentration.



Map 1 – Gwinnett County Low and Moderate Income by Census Tracts



As shown in Map 1, the low and moderate income census tracts in Gwinnett County are located in the Norcross, Buford, and Lawrenceville portions of the county which also coincide with areas of minority concentrations throughout the Country. These Census Tracts are defined as low and moderate income areas based on HUD's determination.

Proportion 501.03 (Base=100) 501.05 8.5 - 2323 - 37 501.04 37 - 52 52 - 66 501.06 66 - 81 506.03 Gwinnett Proportion=31.3 506.04 502.02 502.04 505.13 505.10 505.14 03.08 502.06 505.12 503.07 505.11 502.07 \$03.16 503.10 805.20 506.02 505.09 505.17 505.07 503.13 505.21 505.22 505.19 505.16 505.15 507.13 504.27 507.12 507.15 507.18 507.20 507.05 04.26 504.29 (507.1 507.19 507.21 507.16 504.30 504.15 507.17 507.04 507.09 October 21, 2002

Map 2 – Gwinnett County Areas of Minority Concentrations
[Source: 2010 US Census Data]

According to 2010 U.S. Census Data, the minority population in Gwinnett County makes up nearly 54% of the total population for Gwinnett County. As shown in Map 2, the minority population in Gwinnett is more densely populated throughout the Northeastern segment of the County and along the major interstate routes.

Source: U.S. Census Bureau

AP-55 Affordable Housing

Introduction:

Table 8 – One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported						
Homeless	333					
Non-Homeless	80					
Special-Needs	45					
Total	460					

Table 10 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through						
Rental Assistance	0					
The Production of New Units	0					
Rehab of Existing Units	5					
Acquisition of Existing Units	0					
Total	5					

Discussion:

Gwinnett County will use CDBG and HOME program funds to address housing needs in Gwinnett County. A summary of affordable housing activities to be undertaken this year is listed below.

1. CHDO Related Activities

A minimum of 15% of the total FY 2014 HOME Grant award will be reserved for Atlanta Neighborhood Development Partnership (ANDP), a qualified Gwinnett County Community Housing Development Organizations (CHDO). ANDP will develop affordable housing for the income eligible Gwinnett County residents. In addition, no more than 5% of the HOME Grant Award will be allocated to ANDP for the operating expenses related to CHDO activities.

2. Down Payment Assistance:

Gwinnett County will allocate a total of \$600,000.00 in HOME program funds toward a down-payment assistance program administered through the Gwinnett County Community Development Program. These funds will be provided to 80 eligible first-time homebuyers in the form of a soft-second mortgage (capped at \$7,500) to pay a portion of closing costs and/or down-payment to purchase a new or existing home.

3. Acquisition and Construction of Affordable Homeowner and Rental Housing

Gwinnett County will use a total of \$225,863.00 of HOME funded CHDO Reserve dollars for the acquisition of affordable housing through Gwinnett County.

The Lawrenceville Housing Corporation (LHC) will use \$239,653.00 of HOME funding to facilitate Transitional Housing Program Services. LHC will also utilize \$239,653.00 in HOME funds for the Acquisition/Rehabiliation/Disposition of Single-Family (Attached/Detached) Homes.

These organizations will provide affordable housing for eligible homebuyers.

4. Housing Rehabilitation

Gwinnett County will use CDBG program funds and program income funds to eliminate substandard housing for low income homeowners.

CDBG – Gwinnett County will use \$150,000.00 in CDBG funds to rehabilitate eight (8) additional homes through Minor Home Repair loans for code violations that are a threat to the homeowner's health, safety, and general welfare. These soft-second loans have a five (5) year affordability period which has zero interest and a zero payment requirement.

Increase the Preservation of Existing Housing:

The County allocated \$2.7 million from its CDBG funds at the end of May 2012 to provide funds to rehabilitate the homes of one hundred thirty (130) CDBG-eligible homeowner households over a 24 month period [71 during 2013]. The investment of these CDBG funds assist homeowners with essential repairs to help preserve the existing housing stock, thereby retaining their homes value. The County is seeking additional resources to replenish those funds currently being used, to rehabilitate and preserve the existing deteriorating housing stock.

Increase the Production of New Affordable Housing Units:

Gwinnett County will use \$600,000 of its HOME Program Entitlement funds to assist eligible homebuyers with downpayment assistance to allow them to acquire their first home. Continuation of the HomeStretch Program [HOME Program funds] will provide downpayment and/or closing cost funding awarded from FFY 2014 funds for at least 80 low- and moderate-income homebuyer households during 2014.

Increase the Number of Non-Profit Developers:

The Gwinnett County Community Development Program will work with existing non-profit housing developers to increase development of affordable housing for low- and moderate-income residents. The Community Development Program will offer technical assistance and seek additional funding to support the efforts of such developers.

Seek Additional Resources:

The Community Development Program will research potential government and private resources which

might be used for development of affordable housing by non-profit organizations and developers, and assist such organizations and developers in accessing those resources.

Provide Technical Assistance:

The Community Development Program will provide increased technical assistance to local organizations interested in developing affordable housing.

Seek Out Public-Private Partnerships:

The Community Development Program will attempt to bring together non-profit organizations and private developers for the purpose of creating joint efforts to develop affordable housing.

Prepare Potential Homebuyers For Ownership:

The Community Development Program Office will continue to require that each client attend a HUD approved Housing Counseling Program Class in order to be eligible for Homestretch downpayment assistance, homeowner rehabilitation, or the Neighborhood Stabilization Program. These classes help potential homebuyers become knowledgeable about the home buying process and assists homeowners in understanding how to maintain their homes.

Continue Implementing the Neighborhood Stabilization Program:

In 2014, the Neighborhood Stabilization Program will continue its efforts to acquire, rehabilitate and resell single-family detached housing. To date, the program has completed 126 single family homes and successful rehabilitated a 92 unit multi-family development that is now fully occupied. The Neighborhood Stabilization Program plans to expand its target area to increase its potential housing inventory in a challenging market.

The Community Development Program is undertaking a second multi-family project next year. The Oakland Downs Townhome project in Lawrenceville, Georgia will construct 16 multi-family townhome units for low-income eligible homebuyers. The project is funded through both NSP and HOME dollars and each grant source will build its own 8 unit building. This project will complete the development in a townhome community that was left incomplete years ago by its developer. Once construction is completed in early 2014 it will help stabilize the local market and help businesses and residents see more stabilization in their community. All of the units are projected to be sold in the summer of 2014. Additional efforts will be made to increase and improve public outreach for all of the Community Development Program's housing programs. Staff is being encouraged to get out into the community, attend events, and speak at seminars designed to attract potential clients. Additionally, the program will host its own public housing workshop to generate public interest in the homes that are available and identify how fair housing applies to individual buyers.

Develop Better Community Education:

The Community Development Program will work toward the development of a range of educational literature and tools for use in better educating the general public about the increased awareness and need for affordable housing in Gwinnett County. At the time of the completion of Proposed Action Plan

2014, the County was in the process of creating a Housing Task Force to develop policies and recommendations to be followed in its affordable housing programs and activities. The Task Force will initially focus on the problems created in neighborhoods by the continuing foreclosure crisis. Stakeholder organizations and citizens will be offered an opportunity to share ideas and issues with the Task Force. An objective of the Housing Forums will be linking public and private development organizations to help develop or preserve affordable housing.

AP-60 Public Housing

Introduction

While the County will not use any FFY 2014 HOME Program funds to address the needs of public housing residents. The County will however assist the County's public housing authorities in addressing the needs of public housing residents by offering downpayment assistance programs to eligible residents of public housing.

Actions planned during the next year to address the needs to public housing.

No public housing projects received funding from 2014 HUD Program funds administered by the Gwinnett County Community Development Program Office.

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

The Housing Authority of the City of Lawrenceville

The Lawrenceville Housing Authority (LHA) works with community organizations to ensure residents have access to safe and affordable homes and apartments. They receive funding from the federal government as well as state of Georgia, and every year HUD requires the local Housing Authority to develop an Agency Plan to offer rental assistance and solutions to housing needs. The Agency Plan details specifically how the Lawrenceville Georgia Housing Authority will operate throughout the year and details the assistance they will distribute.

HUD awarded the Housing Authority of the City of Lawrenceville \$292,765.00 and \$248,206.00 respectively through the 2010 and 2011 Capital Fund Grant funds to carry out capital and management activities at existing public housing developments, to ensure continued availability of housing to low-income families. The Housing Authority of the City of Lawrenceville had expended 100% of their 2010 and 2011 Capital Fund grant awards in September 2013. No FY 2014 HUD Capital Funds were awarded to the Lawrenceville Housing Authority.

The Housing Authority of the City of Buford

HUD awarded the Housing Authority of the City of Buford \$283,184.00 through the 2010 Capital Fund Grant for the purpose of assisting the agency in carrying out capital and management activities at existing public housing developments. The funding is provided to ensure that such developments continue to be available to serve low-income families.

The project addressed with this funding includes the installation of fire walls in the attics of each building in the City of Buford's seven apartment developments. The fire walls were designed to match the footprint of each apartment beneath in order to retard, or prevent, the spread of smoke and flame in the unfortunate situation of a fire in an apartment. The project's intention is to contain a fire within

the apartment and prevent it from spreading throughout the building and engulfing other apartment units.

The Buford Housing Authority spent its entire allocated grant of \$283,184 and closed it out in 2012. No FY 2014 Capital Fund Grants are being awarded to the Housing Authority of Buford.

The Housing Authority of the City of Norcross

HUD awarded the Housing Authority of the City of Norcross with \$53,336.00 through the 2011 and \$47,776 through the 2012 HUD Capital Funds. By September of 2013, the Norcross Housing Authority expended 100% of the total awarded grant amounts to carry out capital and management activities at existing public housing.

The usage for these funds includes: interior and exterior improvements (including unit turnaround and cleaning when vacancies occur); interior and exterior painting; interior and exterior doors; kitchen cabinets; repairs to ceilings, floors, roofs, walls and windows; and energy saving showerheads and toilets. No FY 2014 HUD Capital Funds were awarded to the Housing Authority of the city of Norcross.

All three Housing Authorities in Gwinnett County are encouraged to continue to engage their residents in the planning of such projects and to advise the Authorities on their policies and operations. Each Authority is responsible for and reports directly to HUD on resident involvement.

AP-65 Homeless and Other Special Needs Activities

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

Gwinnett's efforts to combat homelessness requires that the root economic causes of homelessness be addressed, which includes insufficient numbers of decent, safe, and sanitary low-cost housing units (limited housing stock) combined with limited financial capacity of homeless households (low wage jobs, depleted savings, excessive debt).

Gwinnett County will invest its Emergency Solutions Grants Program funds received from HUD in FFY 2014 (\$397,141.00) to provide shelter, homeless prevention, and rapid re-housing to at least 1,261 homeless individuals.

Gwinnett County has identified the following goals to reduce and end homelessness:

- 1. The Rapid Re-Housing and Homeless Prevention goal for 2014 is to serve 732 individuals, while the Emergency Shelter component will serve 429 individuals.
- 2. Gwinnett County will continue to invest in emergency shelter activities during the Action Plan period. The County has identified six (6) organizations that will provide emergency shelter for homeless persons in Gwinnett County.
- 3. The Asian American Resource Center (AARC) provides homelessness prevention in the form of rental assistance for individuals and families in need to prevent short-and long-term homelessness.
- 4. The Center for Pan Asian Community Services' Hanna House, a domestic violence shelter, focuses on providing safety, food, shelter, advocacy and other resources to help Asian American women rebuild their lives free from violence.
- 5. The Latin American Association's Homelessness Prevention Program seeks to help Latinos who are homeless or at risk of becoming homeless through financial assistance and supportive services.
- 6. Through the provision of comprehensive case management and financial assistance, Norcross Cooperative Ministries works to provide homeless and homelessness prevention solutions to Gwinnett County citizens in need.

- 7. Operating the largest domestic violence shelter in the state, Partnership Against Domestic Violence provides their comprehensive case management and crisis stabilization services to women and children survivors of domestic violence.
- 8. Rainbow Village's transitional housing program includes mandatory classes, counseling, advisement, and community activities in addition to managed housing that emphasizes accountability.
- 9. ESG funding supports the Salvation Army's Home Sweet Home Gwinnett Program which is a scattered site emergency housing program that targets intact families with children who are homeless or at risk of becoming homeless.
- 10. View Point Health utilizes funding provided through ESG to supplement their efforts to serve chronically homeless individuals with disabilities.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County provides ESG funding for essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Gwinnett County to include homeless families, single men and women, and survivors of domestic violence. The County supports increasing housing options and self-sufficiency for the homeless and near homeless by providing support for emergency housing and supportive services for homeless families and individuals, supporting the development of transitional housing; and by supporting services that prevent persons released from institutions from entering homelessness.

Transitional Housing services provided throughout Gwinnett County assist individuals and families in (1) gaining/regaining financial stability, (2) acquiring permanent affordable housing, (3) providing participants with the necessary life skills to remain in the acquired housing; and (4) assisting participants with obtaining reasonable self-sufficiency.

In 2013, the following eight (8) agencies supported a total of 75 transitional housing units in Gwinnett County: Action Ministries; Asian American Resource Center; The IMPACT! Group; Hope Atlanta; Partnership Against Domestic Violence; Rainbow Village; The Salvation Army; and View Point Health. Funding for transitional housing services was supported by the HUD Supportive Housing Program, United Way, U.S. Department of Justice, U.S. Department of Behavioral Health & Developmental Disabilities, the local faith-based community, private and corporate foundations, and private donors.

Helping homeless persons make the transition to permanent housing

The County will administer the Emergency Solutions Grant Program and oversee activities for homeless individuals and families in Gwinnett County. Gwinnett County has identified rapid re-housing as a

priority for the FFY 2014 funding cycle. Obtaining permanent housing for homeless individuals and families will shorten the length of time spent in emergency and transitional shelters. There is a general consensus that there is a need for rapid re-housing. Non-profit organizations target people currently utilizing their shelters or transitional housing programs. Historical data on these clients will provide these organizations with data to verify that individuals will likely remain homeless.

The intended result of utilizing ESG funds to rapidly re-house homeless persons in Gwinnett County is to reduce the number of homeless persons in the county. Gwinnett County encourages collaboration with organizations to transition as many people as possible into permanent housing.

The County also supports the implementation of a referral and case management system with the tools to direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter -- until a first paycheck is received or a medical emergency is past. Others, however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Because resources are limited, it is important for the system to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. These principles suggest the need for common intake forms, shared data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations, which have been addressed with an improved Homeless Management Information System.

Helping low-income individuals and families avoid becoming homeless:

The County will administer the Emergency Solutions Grant Program (ESG) and coordinate activities to prevent individuals and families from becoming homeless and help individuals/families regain stability in current housing or permanent housing. ESG program funds will be used for homelessness prevention which includes housing relocation and stabilization services and for short term (up to 3 months) or medium term (up to 12 months) of rental assistance to help people avoid becoming homeless. A range of Emergency Shelter facilities and short-term services (food, clothing, and temporary financial assistance, transportation assistance) to meet a variety of family or individual circumstances is necessary to assist families in preventing homelessness. These facilities and services are able to meet the needs of families with children, individuals, persons with special health problems, and other characteristics.

AP-75 Barriers to affordable housing

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing:

The County's current housing market presents significant impediments to developing an adequate supply of affordable housing for low to moderate-income people. The recent economic downturn, coupled with high rates of foreclosed homes in the County has created a significant barrier to affordable housing. The County's 2011 Analysis of Impediments (AI) to Fair Housing Choice examined a number of areas in which barriers to the development of affordable housing might exist.

The barriers identified were:

- 1. Limited supply of affordable housing.
- 2. Banking practices that limit fair housing choice.
- 3. Housing brokerage policies, procedures, and practices which can limit affordable housing choice.
- 4. Property insurance policies, procedures, and practices which can limit affordable housing choice.
- 5. Discriminatory tenant selection in rental housing.
- 6. Zoning laws and decisions, building codes, fees and charges, and taxes which limit the availability and location options for affordable, higher density housing, with the effect of restricting housing choice for low income persons.
- 7. Limited number, limited location, and/or limited types of public and privately owned rental units that are accessible and modified for persons with physical disabilities.
- 8. Neighborhood environment impediments.
- 9. Economic impediments
- 10. Fair housing actions.

Gwinnett County will address the barriers detailed above by taking the following actions.

Possible Modification of Local Building Requirements

The County will evaluate the establishment of an affordable housing zoning classification which will allow developers and builders to construct more affordable housing. For example, a new classification should allow smaller units, greater density, reduced setbacks through easements, and other techniques for reducing the cost of development.

Preserve Existing Affordable Housing Stock

Preservation of existing housing stock is a more cost effective method of creating and maintaining affordable housing, compared to new construction. Renovation costs in Gwinnett County are typically less than \$40,000 per unit, while most new construction costs more than \$180,000 per unit. The County provides rehabilitation funds and emergency repairs, where conditions on housing units present an immediate threat to the health and safety of the residents.

In 2005, Gwinnett County implemented a concentrated code enforcement program in certain targeted areas and has subsequently expanded the program countywide. The Quality of Life Program of Gwinnett County Police Department provides concrete action by the County to help preserve the housing and building stock in the County.

Build Partnership with Financial Institutions

Gwinnett County has built strong relationships with local financial institutions to help with the development of the County. The County and its non-profit partners, such as The IMPACT! Group, work with lenders to help them meet their Community Reinvestment Act (CRA) obligations. The CRA activities by lenders help build stronger neighborhoods by: identifying credit needs and market opportunities in low-and moderate-income areas; developing sound products to meet those needs; and promoting services to target markets. Further, such partnership collaborations may include development of products which leverage public resources, reduce bank risk, and meet critical community needs. Programs may include affordable home mortgages, home improvement loans, and home buyer education.

<u>Increase Education and Awareness about Affordable Housing Issues</u>

general public, local officials, building inspectors and civic organizations.

Gwinnett County will assist agencies and organizations which educate citizens and stakeholders in the affordable housing process. The homeowner education programs being carried out by The IMPACT! Group are being carried out, in part, with additional HUD grants funds awarded by Gwinnett County. The County will work with The IMPACT! Group to provide a clearer understanding of affordable housing issues in Gwinnett County for lenders, realtors, builders, and developers, homeowners associations, the

During 2012, the IMPACT! Group served 901 households, 676 of which (75.03%) were identified as low and moderate income persons, who were prospective homebuyers or who were facing potential mortgage foreclosures. The IMPACT! Group's service goal for 2014 is to serve 793 households.

The Center for Pan Asian Community Services (CPACS) served 111 households, 88 of which (79.3%) were identified as low and moderate-income households who were prospective homebuyers or who were facing potential mortgage foreclosures. CPACS is not recommended for funding in FY 2014.

Other outreach will focus on issues such as informing the public about the need for affordable housing, reducing fears and resistance often put forth by neighborhood organizations which anticipate a reduction in their property values if affordable housing is constructed.

As development costs continue to rise, new approaches to affordable housing will be necessary. Techniques such as mixed-use development may help make such development more acceptable for all.

AP-85 Other Actions

Actions planned to address obstacles to meeting underserved needs:

Three of the greatest underserved needs for low- and moderate-income citizens in Gwinnett County include affordable housing, affordable childcare, and access to affordable and accessible transportation.

Affordable Housing

During FY 2014, Gwinnett County and its existing affordable housing partners, particularly the Gwinnett County Health and Human Services Coalition, the Lawrenceville Housing Corporation, and the Atlanta Neighborhood Development Partnership, will continue to carry out programs and to locate private and/or public funding to continue the development and/or rehabilitation of affordable housing.

Affordable Childcare

Gwinnett County will provide technical assistance to local non-profit childcare providers as they seek public and private funding. Gwinnett County provided FY 2011 CDBG (\$93,882) assistance to Sheltering Arms to reconstruct the playgrounds at the Lillian Webb Childcare Center in Lawrenceville and their Childcare Center in Norcross during 2013.

No childcare projects are receiving funding under Proposed Action Plan 2014.

Affordable Transportation

Gwinnett County placed its new public transit system in operation in November 2001 and has expanded express, local and para-transit services since the system began operations.

Actions planned to foster and maintain affordable housing:

Affordable housing will be maintained and encouraged by the coordination and collaboration among the non-profit housing developers in the community such as Lawrenceville Housing Corporation, Atlanta Neighborhood Development Partnership, and Habitat for Humanity. The County will also continue to support the use of HOME and NSP program funds for down-payment assistance for first time homebuyers as well as continue to purchase foreclosed homes in the interest of preserving affordable housing. Additionally, the County will support the continued use of CDBG program funds for the owner-occupied housing rehabilitation program for citizens with homes in disrepair. In an effort to promote affordable housing and fair housing choice, the County will encourage and support fair housing rights for all and provide program funds to conduct outreach and education regarding the Fair Housing Law act of 1968.

Actions planned to reduce lead-based paint hazards:

Gwinnett County has implemented the following counter-measures to reduce Lead-Based Paint Hazards by abating or removing lead-based paint hazards found in existing housing built prior to 1978. Gwinnett County educates the public on the hazards of lead-based paint and educates parents about protecting

their children. In response to lead-based paint hazards and the limited resources available, the County has planned a steady, long-term response, in accordance with Federal lead-based paint standards, other applicable federal regulations, and local property standards. Gwinnett County will identify houses with lead-based paint through the various housing programs undertaken by the County and will abate or remove lead hazards in high priority units. Government assisted housing rehabilitation projects will include an inspection completed according to HUD and Environmental Protection Agency (EPA) guidelines. Policies and procedures for abatement of lead hazards have been established in Gwinnett County. They include determining cost effectiveness for abatement and procedures for assessing, contracting and inspecting post-abatement work. The policies and procedures also include preparing work write-ups and costs estimates for all income eligible residents in Gwinnett County with identified lead-based paint hazards.

Actions planned to reduce the number of poverty-level families:

Gwinnett County will continue to increase its efforts to implement anti-poverty strategies for the citizens of Gwinnett in the upcoming year. The County will strive to increase its efforts in assisting homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low to moderate income residents.

The County will continue to provide assistance through the following strategies:

- 1. Continue the allocation of funding through the HOME Program for first-time homebuyers program and the Neighborhood Stabilization Program for qualifying homebuyers;
- 2. Continue the allocation of funding through HOME or other funds for new construction, the acquisition and rehabilitation of housing for affordable uses and to house the homeless;
- 3. Promote the use of referral services for the existing Human Service Centers which involves a partnership with many human service agencies in Gwinnett, including job referrals;
- 4. Promote coordination among social service agencies, i.e., through the Gwinnett Coalition for Health and Human Services Comprehensive Plan, to achieve agreement among participating agencies on the major needs for the County to maximize federal, state, county and private resources;
- 5. Support any expansion of local transit service and/or for express transit service to Atlanta and/or para-transit service will be provided based on available funding and demonstrated ridership patterns;
- 6. Promote the efforts of local human service organizations to increase job training programs;
- 7. Encourage job training, i.e., in coordination with the Board of Education for student experience programs, etc.;
- 8. Continue to provide a Jobs Listing on the County Website

- [www.gwinnettcounty.com] for available County jobs;
- 9. Provide job training for inmates of the Gwinnett Correctional Institute using any available Federal, State or local resources; and
- 10. Support the efforts of the Gwinnett County Chamber of Commerce to attract new business and industry to Gwinnett, consistent with the goals and strategies adopted in the Partnership Gwinnett initiative, which includes adopted aggressive job creation goals, and which is targeting certain segments of the economy for business development/job creation.

Through the initiatives described above the Community Development Program Office will continue to assist low and moderate income residents of Gwinnett County over the next year.

Actions planned to develop institutional structure:

Gwinnett County will use its Community Development Program (a program of the Gwinnett County Department of Financial Services) as the lead agency for program planning, management, coordination and administration of the Community Development Block Grant Program, HOME Investment Partnerships Program, Emergency Solutions Grant Program, and the Neighborhood Stabilization Program. The Community Development Program is fully staffed and managed by W. Frank Newton, Inc., a program management firm that specializes in HUD Grant Programs and has been managing all facets of Gwinnett County's HUD Programs since 1987.

The Community Development Program will work as the housing and community development liaison between County agencies; local housing authorities in Buford, Lawrenceville, and Norcross; participating cities; State agencies; and nonprofit and community-based development organizations.

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

The Gwinnett Community Development Program will continue to work as a partner with the Gwinnett County Health and Human Services Coalition to coordinate the planning and delivery of programs and activities, through its member agencies, which are targeted to serve primarily low and moderate income individuals and families and homeless individuals and families.

AP-90 Program Specific Requirements

Community Development Block Grant Program (CDBG)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

	CDBG Available Program Funding	
1.	The total amount of program income that will have been received before the start of	
	the next program year and that has not yet been reprogrammed	\$0
2.	The amount of proceeds from section 108 loan guarantees that will be used during the	
	year to address the priority needs and specific objectives identified in the grantee's	
	strategic plan.	\$0
3.	The amount of surplus funds from urban renewal settlements	\$0
4.	The amount of any grant funds returned to the line of credit for which the planned use	
	has not been included in a prior statement or plan	\$0
5.	The amount of income from float-funded activities	\$0
	Total Program Income:	\$0

Other CDBG Requirements

Other Available Program Funding						
1.	The amount of urgent need activities	0				
2.	The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100%				

HOME Investment Partnership Program (HOME)

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

None.

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Gwinnett County utilizes a recapture policy in compliance of 24 CFR 92.254. The affordability period is determined based upon the amount of HOME Investment Partnership Program funds invested into an individual project. HOME Regulations set three minimum tiers of affordability periods.

If a homeowner chooses to sell or use the property for non-eligible HOME Program activities during the

Period of Affordability, the full amount of the HOME Program Direct Subsidy shall be recaptured and repaid to Gwinnett County provided that net proceeds are sufficient. If net proceeds are insufficient to repay the total HOME investment due, only the actual net proceeds will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies, but there are no funds to recapture. Recaptured funds shall be returned to the Gwinnett County HOME Trust Fund to reinvest in other affordable housing projects for low to moderate income persons.

A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Gwinnett County's resale and recapture provisions ensure the affordability of units acquired with home funds in several ways. The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How Gwinnett County calculates the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded *Direct Subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods:

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:				
Under \$15,000	5 years				
Between \$15,000 and \$40,000	10 years				
Over \$40,000	15 years				

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

At the time of the development of Action Plan 2014, Gwinnett County had no intention to use any of its

FFY 2014 HOME Program funds to refinance existing debt secured by housing that is rehabilitated with HOME Program funds. However, the Gwinnett County HOME Program Refinancing Guidelines are included in Proposed Action Plan 2014, should any refinancing become necessary.

Emergency Solutions Grant (ESG)

Include written standards for providing ESG assistance (may include as attachment):

Gwinnett County will focus on the two eligible populations that can be assisted with funds: persons at risk of becoming homeless and persons who are literally homeless. Even though these are the targeted populations, it is important to give assistance to eligible participants who are in the most need of funds.

Eligibility for Assistance

Each individual or family who is receiving assistance must first meet with a case manager or intake personnel who can determine the appropriate type of assistance to meet their needs. The household must be at or below 30% of Area Median Income (AMI). Assets are counted for determining AMI eligibility. AMI is prospective and only counts income generated at that particular time. The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

Staff Certification of Eligibility for Assistance

Gwinnett County will continue to use the Staff Certification of Eligibility for assistance as the primary documentation that a perspective household identified for assistance, certifies that true and complete information was used to determine eligibility, and certifies that no conflict of interest exists related to the provision of ESG assistance. Each staff person determining ESG eligibility for a household must complete the Staff Certification of Eligibility for every household, once the household is determined eligible for ESG assistance. The completed Staff Affidavit remains valid until or unless a different staff person re-determines ESG eligibility. ESG Staff Certifications of Eligibility must be signed and dated by ESG staff and supervisors for each household approved for ESG assistance.

Homelessness Prevention Assistance

Although there are minimum requirements, HUD encourages grantees and subrecipients to target prevention assistance to individuals and families at the greatest risk of becoming homeless.

The target population for Gwinnett County will have the following risk factors:

- Eviction within 2 weeks from a private dwelling
- Sudden and significant loss of income
- Severe house cost burden (greater than 50% of income for housing costs)
- Pending foreclosure of rental housing
- Credit problems that preclude obtaining of housing

Rapid Re-Housing Assistance:

Rapid re-housing assistance is available for persons who are homeless according to HUD's definition.

The target population for Gwinnett County rapid re-housing will have the following risk factors:

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

The purpose of these funds is to assist eligible program participants to move into permanent housing and achieve housing stability. Therefore, Gwinnett County subrecipients providing assistance will utilize a process to assess, for all potential program participants, their level of service need, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG. Program participants who require longer-term housing assistance and services should be directed to agencies that can provide the requisite services and financial assistance.

Coordination

Gwinnett County will coordinate with the Georgia Balance of State Continuum of Care (CoC) by attending and participating in all Continuum of Care meetings.

Determining and prioritizing eligibility

The County and its subrecipients recognize that individuals and households must be prioritized to ensure that funding is distributed to best serve the needs of those who are homeless or at greatest risk of becoming literally homeless but for ESG assistance.

Subrecipients will perform intake and evaluate each individual and household on a case-by-case basis. Subrecipients recognize that each case is different, and that the demographics throughout the County are so different so as to not be able to approach potential clients with a "one size fits all strategy." To best prioritize those who are homeless or at risk of becoming homeless for rapid re-housing or homeless prevention funds, those who are at risk of becoming homeless will need to show that they will become literally homeless if not "but for" receiving ESG Homeless Prevention funds, and they must have also gone through a hardship to become at risk of losing their home.

Subrecipients may choose to prioritize homeless individuals and households who have been involved with their particular program for Rapid Re-housing assistance, although each individual and household will be evaluated before being able to receive funding.

In addition to the household income being below 30% AMI and the household currently experiencing homelessness or being at imminent risk of becoming homeless, there must be documented evidence in the client files that:

- There is a lack of financial resources
- There are NO other housing options
- There are NO support Networks

Client share of rent and utilities costs

The County will require each program participant household will be evaluated on a case-by-case basis. When a provider determines that a household is a priority for either Homeless Prevention or Rapid Rehousing rental assistance, they will be eligible to receive 100% rental assistance for no more than the full amount of the rent as stated on the lease.

Short Term and Medium Term Rental Assistance Duration

The County will allow subrecipients to utilize short-term and medium-term rental assistance to allow individuals and families to remain in their existing rental units or to help them obtain and remain in rental units they select. A lease must be in place in the program participants name for them to get assistance.

Short-term rental assistance can only be used for 3 months while medium-term rental assistance covers rental assistance for 4 to 24 months. No program participant may receive more than 24 months of assistance under ESG, and each program participant must be evaluated every 3 months to determine the amount of assistance needed.

Rental assistance may also be used to pay up to 6 months of rental arrears for eligible program participants but these 6 months count towards the 24 month total. The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." "Rent reasonableness" means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program. Cost types are the categories of eligible HPRP financial assistance: rent either the client portion or the subsidy; security deposits, utility deposits, utility payments, moving cost assistance, and hotel/motel vouchers.

If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Georgia Balance of State Continuum of Care has not formally developed a coordinated assessment system; however, Gwinnett County – in conjunction with the Balance of State CoC – and the Georgia Department of Community Affairs are utilizing the same ESG forms as a first step towards developing an outreach and intake system.

Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Community Development Program Office publishes a notification of funding in the Gwinnett Daily Post, the local legal organ, to announce the availability of program funds. Applications are also emailed to the Community Development Program's wide network of stakeholders and posted on the Gwinnett County website for organizations to download and complete to apply for funding. These applications are then reviewed by an applications committee for conformance with the programs requirements, qualifications of applicants, availability of matching funds, and other factors, and made recommendations to the Gwinnett County Board of Commissioners for final approval of funding allocations.

If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Gwinnett County Community Development Program requires subrecipient organizations to include homeless or formerly homeless individuals on the Board of Directors or other equivalent policymaking entity. Non-profit organizations recommended for FY 2014 funding have procedures in place for homeless or formerly homeless persons to be involved with the program design and implementation.

Describe performance standards for evaluating ESG.

Performance standards provide a measure for ESG recipients to evaluate the effectiveness of each ESG service provider in the areas of: (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and (d) Reducing clients' housing barriers or housing stability risks.

Gwinnett County will evaluate each ESG service provider's performance based on the following standards:

- 1. Develop and adhere to priorities for service delivery by need.
- 2. Assist clients in rapid movement to permanent housing from shelters or from the street.
- 3. Ensure that clients have easy access to services (No Wrong Door Approach).
- 4. Provide comprehensive case management to address a spectrum of needs for each client.

Table 9 – ESG Performance Standards

ESG Program	Performance Measure	Applicable	Target	Performance Measure	Applicable	Target		
Component		Standard	Percentage		Standard	Percentage		
		Reference			Reference			
Emergency	Percentage of clients who	2	75%	Percentage of clients who exit	2	90%		
Shelter (ES)	exit shelter to permanent			shelter in less than 90 days				
	housing							
ES – Esn.	Percentage of eligible	3,4	95%	Percentage of clients who have a	1,4	50%		
Services	clients in ES who are			special need (as identified on				
	connected with			Pathways' Special Needs screen)				
	mainstream resources			or two or more significant				
	before leaving shelter			barriers to housing stability				
Street Outreach	The Gwinnett County ESG Pr	ogram will not o	perate Street C	Dutreach activities.		•		
Homelessness	Percentage of clients	2,4	60%	Percentage of clients receiving	2,4	50%		
Prevention	receiving assistance who			assistance who are still stably				
	are still stably housed			housed six months after				
	three months after			assistance ends				
	assistance ends							
Rapid Re-	Percentage of clients	2,4	50%	Percentage of clients receiving	2,4	40%		
Housing	receiving assistance who			assistance who are still stably				
	are still stably housed			housed six months after				
	three months after			assistance ends				
	assistance ends							

Monitoring

Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

To ensure that each recipient of CDBG, HOME and ESG funds operates in compliance with applicable federal laws and regulations, the Gwinnett County Community Development Program Office implements a monitoring strategy that closely reviews Subrecipient activities and provides extensive technical assistance to prevent potential compliance issues.

Each year, Community Development program staff prepares a risk analysis matrix for monitoring all appropriate Subrecipients. Once projects have been approved and subrecipients have been issued Subrecipient agreements, the relevant staff members conduct a four page risk analysis worksheet that reviews Financial Capacity; Overall Management; Planning Capacity and National Objectives. Each Subrecipient is graded and its score is based on one of three categories: Low Risk [0-30 points]; Moderate Risk [31-50 points]; and High Risk [51-100 points]. Based on the scoring for each Subrecipient, the Community Development Program determines its annual monitoring schedule based on the number of moderate and high risk subrecipients.

As a general rule, staff monitors on-site all moderate and high risk subrecipients on an annual basis, typically in the third or fourth quarter of each Program Year. Conversely, the low-risk subrecipients are monitored on-site every other program year during the same time frame, and desk reviews are conducted throughout the year. Community Development staff closely monitors performance expectations of subrecipients [timeliness and productivity] in line with the new performance measurement system initiated by HUD.

The above actions are a consistent element of the Gwinnett County Community Development Program Office in our efforts to effectively manage the monitoring process for the CDBG, HOME, and ESG Programs.

Gwinnett County CDBG, HOME, and ESG Funding and Protected Classes

As outlined in the following table, Gwinnett County will address the needs of minorities, people with disabilities, and other protected classes in the FY2014 Action Plan by funding organizations that primarily serve eligible clients who are representative of the protected classes under the Fair Housing Act. The County will utilize funding from the CDBG, HOME, and ESG programs to address the needs of these protected classes.

Gwinnett County will recieve the following allocations: CDBG (\$5,098,532.00); HOME (\$1,505,743.00); and ESG (\$397,141.00). The CDBG and HOME Programs also expect to receive approximately \$100,000 in program income [\$50,000 for the CDBG Program and \$50,000 for the HOME Program, respectively]

bringing the total to \$7,101,416.00. The total grant allocation (less administrative allocations) is shown in the table below. The percentages shown in the table on the next page refers to those funds allocated to meet the needs of protected classes in the County.										

Table 1 - Protected Class Funding Summary

O mod allo		Clients Served and Proposed		Protected Classes								
Organization	Clientele Served	2013	2014	Race	Color	Famil	lial Status	Nati	onal Origin	Disability	Sex	Religion
GC CDBG Housing Rehab	Low/mod income persons	71	8	\$ 37,500.00		\$ 3	37,500.00			\$ 37,500.00	\$ 37,500.00	
GC Housing Service Delivery Costs	Low/mod income persons	71	8	\$ 7,500.00		\$	7,500.00			\$ 7,500.00	\$ 7,500.00	
CDBG - Homestretch	Low/mod income persons	33	80	\$ 17,500.00		\$:	17,500.00			\$ 17,500.00	\$ 17,500.00	
City of Buford - South Street	Low/mod income persons	350	698	\$ 544,000.00								
GC Dept of Community Services - Senior Center Construction	Senior adults	2000	35100	\$ 1,348,378.00								
GC Dept of Transportation - Sidewalk	Low/mod income persons	New project	13955	\$ 1,348,378.00								
PADV - Shelter Operating Costs	Battered and abused spouses	325	325			\$:	18,375.00				\$ 18,375.00	
CredAbility	Battered and abused spouses	New project	195			\$:	18,375.00				\$ 18,375.00	
Hi Hope Service Center - Operating Costs	Disabled adults	14	22							\$ 96,000.00		
Gwinnett Children's Shelter - Operating	Abused and neglected children	135	200			\$ 10	02,438.00					
GC Dept of Community Services - Operating Costs	Senior adults	265	2200	\$ 86,500.00								
Africa's Children's Fund	Abused and neglected children	New project	240			\$ 4	48,000.00					
Hope Clinic - Operating Costs	Low/mod income persons	New project	800	\$ 93,338.00								
Good Samaritan Health Center	Low/mod income persons	New project	1152	\$ 65,000.00								
The IMPACT! Group	Low/mod income persons	320	1145	\$ 150,000.00								
Boys and Girls Club of Metro Atl	Low/mod income persons	New project	165	\$ 50,000.00								
Asian American Resource Center - ESG	Low/mod income persons	210	30					\$	2,200.00			
CPACS -ESG	Low/mod income persons	20	23					\$	35,656.00			
Latin American Association - ESG	Low/mod income persons	New project	325					\$	19,415.00			
Norcross Cooperative Ministries - ESG	Low/mod income persons	189	240	\$ 70,771.00								
PADV - ESG	Battered and abused spouses	195	325				\$24,328				\$24,328	
Rainbow Village - ESG	Low/mod income persons	55	110	\$ 41,656.00								
Salvation Army - ESG	Low/mod income persons	56	160	\$ 78,879.00								
ViewPoint Health - ESG	Low/mod income persons	15	60	\$ 62,123.00								
CHDO Operating - HOME	Low/mod income persons	N/A	N/A	\$ 12,500.00		\$:	12,500.00			\$ 12,500.00	\$ 12,500.00	
CHDO Reserve- HOME	Low/mod income persons	10	N/A	\$ 56,465.75		\$!	56,465.75			\$ 56,465.75	\$ 56,465.75	
Lawrenceville Housing Corporation - Transitional Housing	Low/mod income persons	New project	12	\$ 59,913.25		\$!	59,913.25			\$ 59,913.25	\$ 59,913.25	
Lawrenceville Housing Corporation - Acqusition/Rehabilitation/Disposition of Single Family (Attached/Detached) Homes	Low/mod income persons	4	4	\$ 59,913.25		\$!	59,913.25			\$ 59,913.25	\$ 59,913.25	
GC HOME Down Payment Assistance - HOME	Low/mod income persons	33	80	\$ 150,000.00		\$ 15	50,000.00			\$ 150,000.00	\$ 150,000.00	
	TOTALS	4371	57662	\$ 4,340,315.25	\$ -	\$ 63	12,808.25	\$	57,271.00	\$ 497,292.25	\$ 462,370.25	\$ -
Percentage of Grant Funds	Allocated to protected classes			72.70%	0.00%	5	10.26%		0.96%	8.33%	7.74%	0.00%

