

CARES Act Amendment after Kentucky received additional formula allocations from the CARES Act.

Executive Summary

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

1. Introduction

The Commonwealth of Kentucky Federal Fiscal Year 2019 Action Plan (the state's FY 2020) represents a collaborative endeavor and outlines the affordable housing and community development strategies the state will utilize in allocating funding it receives from the following U.S. Department of Housing and Urban Development (HUD) block grant programs:

- HOME Investment Partnerships Program (HOME)
- Community Development Block Grant Program (CDBG)
- Emergency Solutions Grant Program (ESG)
- Housing Opportunities for Persons with AIDS Program (HOPWA)
- National Housing Trust Fund (National HTF)
- Community Development Block Grant Program CARES (CDBG-CV)
- Emergency Solutions Grant Program CARES (ESG-CV)
- Housing Opportunities for Persons with AIDS Program CARES (HOPWA-CV)

KHC and DLG undertook efforts to collaborate with the public, local governments, non-profit housing and services providers, other state agencies, and housing developers to focus on notifications to minorities and persons with limited English proficiency and other interested parties through public hearings and developer forums.

This Consolidated Plan covers non-entitlement areas of the state of Kentucky. Entities requiring a Certificate of Consistency with this plan should access the web link at:

<http://www.kyhousing.org/Resources/Planning-Documents/Pages/Consolidated-Plan.aspx>.

In December 2019, a novel coronavirus known as SARS-CoV-2, spread globally, causing a disease known as COVID-19. By March 2020, the World Health Organization declared a pandemic, and President Trump declared the outbreak a national emergency. Kentucky, along with most other states, declared a state of emergency and shut down places of business, large gatherings, and limited the movement of its residents. Consequentially, many Kentuckians are faced with challenges such as job loss, trouble finding appropriate shelter options, and other economic consequences. Providers in Kentucky face challenges on: how to appropriately separate clients and residents to prevent the spread of the virus; obtaining necessary supplies and trainings; and maintaining necessary staff levels. On March 27, 2020, Congress

passed the Coronavirus Aid, Relief and Economic Security (CARES Act, aimed at alleviating the challenges communities face when dealing with COVID-19. In April 2020, Kentucky Housing Corporation and the Department for Local Government received new formula allocations of CDBG-CV (\$15,568,714), ESG-CV (\$8,877,469), and HOPWA-CV (\$129,762) funds as authorized by the CARES Act to address these challenges.

On May 11, 2020, Kentucky received notice of a second allocation of CDBG-CV (\$16,942,485) awarded by the HUD Secretary based on need. On June 9, 2020, Kentucky received notice of a second allocation of ESG-CV (\$14,526,981) NOTE: The Commonwealth of Kentucky may receive additional awards of CDBG-CV and/or ESG-CV authorized by the CARES Act to be allocated by the HUD Secretary based on need. If additional funds are received, another substantial amendment to the 2019 Action Plan will be submitted, as directed in the CARES Act Flexibilities for ESG and HOPWA Funds Used to Support Coronavirus Response and Plan Amendment Waiver Memorandum issued by HUD on May 4, 2020. In addition to its HOPWA-CV funding awarded by formula, the Commonwealth also received an award of HOPWA-CV (\$48,133) to supplement its HOPWA competitive grant. This HOPWA competitive allocation is not governed by the Consolidated Plan.

Waiver Information

In March, April, and May 2020, HUD issued the following waivers to facilitate communities' response to COVID-19 using Community Planning and Development funds:

- Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19 (March 31, 2020)
- Availability of Waivers and Suspensions fo the HOME Program Requirements in Response to COVID-19 Pandemic (April 10, 2020)
- Suspensions and Waivers to Facilitate Use of HOME-Assisted Tenant-Based Rental Assistance (TBRA) for Emergency and Short-Term Assistance in Response to COVID-19 Pandemic. (April 10, 2020)
- Availability of Additional Waivers for Community Planning and Development (CPD) Grant Programs to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19 (May 22, 2020)
- CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response Act (April 9, 2020)
- CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response and plan amendment waiver (April 9, 2020)
- CARES Act Flexibilities for ESG and HOPWA Funds Used to Support Coronavirus Response and Plan Amendment Waiver (May 4, 2020)
- Availability of a Waiver and Alternate Requirement for the Consolidated Annual Performance and Evaluation Report (Performance Report) for Community Planning and Development (CPD) Grant Programs in Response to the Spread of Coronavirus (May 7, 2020)

- Coronavirus Aid, Relief, and Economic Security Act Implementation Instructions and Related Flexibilities for the Housing Opportunities for Persons With AIDS Program (Notice CPD-20-05, May 8, 2020)

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Federal statutes governing these grant programs communicate three basic goals by which HUD evaluates performance under the plan. Kentucky's strategy for pursuing these three statutory goals is:

Decent Housing, which includes

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, sexual orientation, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

A Suitable Living Environment, which includes

- improving the safety and livability of neighborhoods;
- eliminating blighting influences and the deterioration of property and facilities;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural or aesthetic value; and
- conserving energy resources and use of renewable energy sources.

Expanded Economic Opportunities, which includes

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- the provision of public services concerned with employment;

- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of communities; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally-assisted housing and public housing.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The current five-year Consolidated Plan includes goals and strategies to preserve existing multifamily housing and increase the supply of affordable multifamily housing units, as the state is in danger of losing a substantial portion of its affordable housing over the next several years. Programs that focus on assisting persons with special needs and the homeless has resulted in new programs and the revision of existing programs to focus on homelessness prevention, rapid re-housing of homeless persons, and supportive housing for persons with disabilities.

Overarching housing needs that remain constant over time are: persons with special needs require supports to obtain and retain housing; households in the lowest income categories are housing cost-burdened in high numbers; and there remains a severe shortage of affordable, decent housing. Aging housing stock remains of great concern. Older single-family homes may not be energy efficient and contribute to housing cost burden. Multifamily housing units constructed decades ago need rehabilitation. Affordable rental projects financed years ago are nearing the end of their affordability periods and are at risk of loss.

Future focus, for the near term, will remain on improving the existing housing stock, creating new affordable housing units, coordinating housing and services in partnership with other agencies for persons with special needs, and creating economic opportunities for Kentucky's families. Additional information on past performance can be found in the Consolidated Annual Performance and Evaluation Reports (CAPERS) that KHC and DLG submit to HUD each year in September. These reports are available on KHC's web site at www.kyhousing.org, under Resources. CAPER reports include data on the number of housing units funded, number of housing units completed, economic development, infrastructure, and other community projects, as well as demographic information on households assisted under each program.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

KHC and DLG value input from Kentucky citizens in the planning process. Participation was solicited by announcing the time and location of the public hearing and comment period through legal notices, electronic mail notification to a list of over 15,000 subscribers, direct email to numerous agencies serving minorities and persons with limited English proficiency, and social media. A full public hearing covering all programs was held on February 20, 2019, at KHC. The public hearing held on February 20, 2019, at KHC was attended by two partners who provided comments. Additional partners provided written comments after the hearing. A public comment period was held May 1 through May 31.

KHC and DLG consulted with numerous agencies and partners throughout the process. These consultations included direct contact, public hearings, and presentations at meetings of statutory committees and other groups. The state made a concerted effort to solicit input from organizations that serve minorities and persons with limited English proficiency, such as placing notices in *Al Dia*, a Spanish-language publication. During the public comment period, KHC placed notices in *Al Dia* and *El Kentubano*, both Spanish-language publications.

In April 2020, KHC and DLG received notice of additional funding authorized under the CARES Act. This includes funding for CDBG, ESG, and HOPWA. A public comment period will be held to obtain additional needs information and to allow citizens and the general public to participate in the process. Per HUD waivers issued March 31, 2020, Items 8 and 9 of the Memorandum waive the normal 30-day public comment period. The waiver allows for a five-day abbreviated public comment period. KHC and DLG observed this guidance.

KHC issued a public notice of a public comment period on May 11, 2020. The public comment period was held May 11 through May 19, 2020.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

At the public hearing, representatives from KHC and DLG presented information on each program area. The partner agency representatives who attended commented with their appreciation for using HOME funds for homebuyers and shared that they would like to see and urge KHC to take a balanced approach to allocations. Partners commented that they understand there is no “one size fits all” approach and encouraged KHC to offer different options to partner agencies.

During the public comment period, KHC received written comments from partners. Partners recommended designing a program that empowers communities to address housing needs and continued investment in CHDOs. Partners expressed interest in leveraging NHTF for rental housing development for very low income housing in Kentucky. As with the public hearing, partners encouraged KHC to be flexible and offer different program options and guidelines. Partners asked that KHC consider giving priority to projects located in Promise Zones. Partners also ask DLG to consider addressing

housing deficiencies in ARC counties, for example, in Lewis County, and encouraged continued funding for programs such as Recovery Kentucky. Partners commented that there should be sufficient HOME TBRA funding to fill gaps in rural areas and recommended an increase in the HOME TBRA allocation. Partners agreed that the Housing Policy Advisory Committee (HPAC) should play a broader role in recommending solutions and providing guidance to KHC. Partners commended KHC for coordinating programs and committing to the reduction of regulatory barriers and urged KHC to mind the need for a balance HOME allocation.

KHC and DLG received several written comments from partners and other organizations during the May 11, 2020 public comment period. Most comments addressed the CDBG-CV funding. Partners asked KHC and DLG to consider: dedicating funding to gap financing for affordable housing developments already funded through KHC's tax exempt bond program; making funds available to all communities around the commonwealth, including participating jurisdictions; consider making funds available for rehab and new construction for homeowner and rental activities; encouraging DLG to accept multiple applications from city and county governments; adjusting the funds and requirements of CDBG program and project areas; and adjusting match requirements. The full contents of the written comments may be found attached to this Action Plan in the AD-26 Administration section.

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

There were no comments or views not accepted.

During the public comment period from May 11 through May 19, 2020, there were no comments or views not accepted.

7. Summary

KHC and DLG collaborates and outlines affordable housing and community development strategies to utilize the CDBG, HOME, ESG, HOPWA, and NHTF block grant funds. KHC and DLG cooperate with the public, local governments, non-profit housing and services providers, other state agencies, and housing developers.

Federal statutes governing these grant programs communicate three basic goals by which HUD evaluates performance under the plan. Kentucky pursues a strategy to address the statutory goals by focusing on: decent housing, a suitable living environment, and expanded economic opportunities. The current five-year Consolidated Plan includes goals and strategies to preserve existing multifamily housing and increase the supply of affordable multifamily housing units and to administer programs that focus on assisting persons with special needs and the homeless.

KHC and DLG recognize there are numerous overarching housing needs that remain constant over time. Future focus, for the near term, will remain on improving the existing housing stock, creating new

affordable housing units, coordinating housing and services in partnership with other agencies for persons with special needs, and creating economic opportunities for Kentucky's families.

KHC and DLG value input from Kentucky citizens in the planning process. Participation was solicited through a public hearing, a public comment period, and through email distribution lists and newspaper ads. Partners shared comments at the public hearing, and they also submitted written comments before and during the public comment period. There were no comments or views not accepted.

KHC and DLG made the proposed amended 2019 Action Plan available to community partners during a public comment period. Partners and other organizations submitted several written comments. The public notice and full comments are attached to this plan. There were no comments or views not accepted.

PR-05 Lead & Responsible Agencies - 91.300(b)

1. 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.

| Agency Role | Name | Department/Agency |
|-----------------------|----------|--|
| CDBG Administrator | KENTUCKY | Dept for Local Government/Office of Federal Grants |
| HOPWA Administrator | KENTUCKY | KHC Housing Contract Administration |
| HOME Administrator | KENTUCKY | KHC Housing Contract Administration |
| ESG Administrator | KENTUCKY | KHC Housing Contract Administration |
| HOPWA-C Administrator | KENTUCKY | Specialized Housing Resources |
| | KENTUCKY | KHC Multifamily Programs |

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

KHC and DLG endeavor to consult with partners, state and federal agencies, local governments, non-profit and for-profit housing developers, citizens, and many other parties interested in providing input prior to and during the drafting of this Action Plan. Consultation with all entities is ongoing throughout the year. In addition to formal public hearings prior to drafting the Annual Action Plan, KHC and DLG engaged partners and other interested parties at meetings of the Continuum of Care, Housing Policy Advisory Committee, Kentucky Interagency Council on Homelessness, and others. These forums offer the opportunity for constant communication and feedback on needs and priorities.

With federal funding for the four block grant programs in danger of continued decrease or outright elimination, and great need continuing, many discussions were held with partners. The activities included in this plan reflect the balance between needs and available resources as DLG and KHC have best been able to balance them.

Last year, KHC undertook a statewide housing needs assessment, and asked its partners to participate. The findings of this assessment became available after June 2018. Information collected in the assessment may assist KHC in allocating scarce and decreasing resources and may also be used as a reference for the next five-year Consolidated Plan housing needs assessment and market analysis.

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

One way that state enhances coordination is through the state's Housing Policy Advisory Committee, which plays an active role in advising KHC regarding affordable housing issues. The advisory committee consists of 10 ex-officio state government members, 17 at-large members appointed by KHC's Board, a member of the Senate, and a member of the House of Representatives.

KHC and the state Cabinet for Health and Family Services (CHFS) work very closely together on numerous initiatives, including Chaffee Room and Board, Olmstead Housing, Weatherization, and LIHEAP. KHC has full-time dedicated staff tasked to coordinate housing and services initiatives funded by KHC and the Cabinet.

Local partnerships with community mental health agencies have been established so referrals to the Olmstead Housing program are easily made.

Partnering with the state Division of Behavioral Health KHC promotes their online SOAR (SSI/SSDI, Outreach, Access, and Recovery) trainings throughout the state. SOAR teaches case managers how to thoroughly complete disability applications. With techniques from these trainings, more disability

applications will be approved upon the first submission. Although SSI/SSDI will not lift households above the poverty line, it certainly can help households sustain an income and medical insurance, and with housing assistance, can be as sufficient as the individual has capacity to be.

Permanent supportive housing (PSH) projects funded through the Continuum of Care (CoC) Program serve homeless individuals and families with documented disabilities. These projects are designed as part of the CoC strategy to promote the development of housing and supportive services to assist homeless persons in the transition from streets and shelters to permanent housing and maximum self-sufficiency, especially persons experiencing chronic homelessness. The projects are renewable annually through the CoC application.

KHC, through its Housing Choice Voucher program available in 87 counties, created the Kentucky Moving On initiative in 2017. The program is a partnership with the Kentucky Balance of State Continuum of Care whereby persons currently in CoC-funded permanent supportive housing units who are no longer in need of intensive case management and supportive services may transition out of the PSH-funded resource into a Housing Choice Voucher within the community. The program allows people who have achieved housing stability to transition into community-based housing and frees up limited PSH resources for persons with more severe needs, such as those experiencing chronic homelessness.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

KHC serves as the collaborative applicant and lead agency for the Kentucky Balance of State Continuum of Care (KY BoS CoC), which includes 118 Kentucky counties. KHC also is the recipient of approximately 40 CoC grants, which it sub-grants to partners across the state or administers itself (e.g. HMIS). Working with the KY BoS CoC, KHC establishes scoring criteria for the CoC Competitive Application process that encourages projects to reallocate funds from transitional housing projects to permanent housing; adopt low barrier Housing First models that focus on quickly housing participants without setting preconditions such as participation in recovery programs or setting minimum income requirements that can keep people from getting off the streets and out of emergency shelters. As of 2018, 100 percent of the KY BoS CoC's program-funded projects are using the Housing First model. The KY BoS CoC has also adopted CPD Notice 16-11, which establishes the order of prioritization for chronically homeless and persons with the highest needs. This prioritization order is used by PSH projects in the BoS regardless of if their beds are formally dedicated for chronically homeless. The KY BoS CoC, through the CoC and ESG programs, has significantly increased its inventory of Rapid Rehousing (RRH) resources, which is particularly help for families experiencing homelessness.

The KY BoS CoC has fully implemented its Coordinated Entry System, which is designed to move people with the highest needs as quickly as possible into permanent housing or divert people from the homeless emergency response system entirely, if possible. Through coordinated entry, limited resources

are used more effectively and collaboration with multiple organizations, including those not receiving federal funding, is enhanced.

The KY BoS CoC was selected as one of ten communities nationwide out of 130 applicants to participate in the first round of HUD's Youth Homeless Demonstration Program (YHDP). HUD awarded \$1.9 million to create a coordinated community plan to prevent and end homelessness among unaccompanied and parenting youth and fund demonstration projects serving youth in the eight-county Southeastern Kentucky Promise Zone. Funded activities include transitional crisis housing, rapid re-housing, and supportive services, including system navigation, with projects launched in late 2018. YHDP activities are guided by the Coordinated Community Plan to Prevent and End Youth Homelessness in the Southeastern Kentucky Promise Zone released on December 21, 2017.

In the most recent CoC competition, the KY BoS CoC was awarded funding through the Domestic Violence (DV) Bonus set-aside for two new projects. These projects are specifically for individuals and families with children that are victims of domestic violence, dating violence, and sexual violence and who are experiencing homelessness.

In addition to coordinating the KY BoS CoC KHC works with the state Cabinet for Health and Family Services to manage programs that assist homeless veterans and persons with persistent mental illness, both populations that are at high risk.

KHC is a member of the Kentucky Interagency Council on Homelessness (KICH). KICH is composed of representation from state government, nonprofit agencies, and advocacy agencies that collaborate and perform duties related to serving special needs populations, including the homeless. Representatives of state cabinets and nonprofit organizations (including, but limited to, those who serve veterans, homeless, families with children and youth aging out of foster care) are active participants on the executive committee and subcommittees.

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

The KY BoS CoC encompasses 118 counties and is divided into six regions. The planning process begins at the local level with regional planning committees and 15 subregions called Local Prioritization Communities (LPC) that work together to implement the CoC's coordinated entry system. The Cities of Lexington and Louisville have their own CoC application processes and are funded separately from the KY BoS CoC. In addition, Louisville and Lexington are entitlement communities, receiving a direct allocation of ESG funding from HUD.

In the KY BoS CoC service providers, developers, community leaders, advocates, financial institutions, and homeless service clients participate at the local level and as members of the KY BoS CoC full membership. At local planning meetings held throughout the year, participants evaluate their service delivery system, coordinate plans to avoid duplication, share resources, and establish goals for eliminating gaps in the local delivery system. This community-based process assesses services from prevention to self-sufficiency in permanent housing. The implementation of the KY BoS CoC's Coordinated Entry System allows local planning areas to quickly identify gaps and determine if CoC and ESG resources need to be repurposed. For example, the K BoS CoC, which includes ESG and CoC-funded agencies, uses the VI-SPDAT as its common assessment tool to determine the best housing intervention for persons who are homeless and scores people based on their severity of need. In some areas, many people are recommended for RRH, but there are currently not enough RRH resources in that area. This information is used to inform the next ESG and CoC program funding priorities.

In addition, in 2016 HUD formally established the System Performance Measures for CoCs. CoCs must use this system to evaluate how they are doing at ensuring homelessness is rare, brief, and non-recurring. The measures are used by HUD to evaluate CoCs as part of the annual competitive application process. ESG and CoC-funded agencies are using these measures to evaluate their own programs and the KY BoS CoC is using them to monitor progress as a system. The KY BoS CoC reviews progress on the measures and will make funding decisions, in part, based on the information it gleanes from these outcomes.

KHC, as the Collaborative Applicant for the KY BoS CoC, has the opportunity and ability to reach out to CoC members to obtain feedback and guidance. Through regional CoC meetings, information is routinely shared on the anticipated timeline for the allocation of the Emergency Solutions Grant funds. CoC Webinars give KHC ESG staff an opportunity to present information about the annual plan and to field questions from CoC partner agencies on the potential roll-out of the funding as well as request feedback on potential changes to the allocation process in future funding rounds. KHC staff also participate in the CoC process for the Louisville and Lexington areas, attending their meetings on a regular basis or as needed. This allows them to provide regular information about and receive feedback on the Kentucky ESG process. In addition to the webinars and regional CoC meetings, KHC, as Collaborative Applicant, coordinates the KY BoS CoC Advisory Board, which guides the decisions affecting the CoC. The KY BoS CoC Advisory Board is made up of 17 representatives from across the state and of a cross-section of homeless and special needs service providers, a representative who is experiencing or previously experienced homelessness, and at-large representatives that do not receive CoC or ESG funding. The Board will continue to be a pivotal link to the KY BoS CoC and the larger services community.

KHC also communicates often with partners via eGram service. Thousands of people subscribe to this service for periodic messages on ESG and other programs. KHC often uses this tool to invite comments on various programs and policies.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|---------------------------------------|--|
| 1 | Agency/Group/Organization | Kentucky Interagency Council on Homelessness |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Statutory Advisory Committee |

| | | |
|---|--|---|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | KICH is an active, ongoing partner in advising KHC regarding issues pertaining to homelessness. KICH consists of numerous entities that coordinate housing and services. More information about KICH is included in the above narratives. |
| 2 | Agency/Group/Organization | Homeless and Housing Coalition of Kentucky |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-homeless Regional organization Planning organization |

| | | |
|---|--|--|
| | 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 Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Public hearing attendee. This entity is consulted year-round and is a partner in the management of KICH. |
| 3 | Agency/Group/Organization | KENTUCKY COALITION AGAINST DOMESTIC VIOLENCE |
| | Agency/Group/Organization Type | Housing PHA Services-Victims of Domestic Violence Services - Victims Regional organization Planning organization |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | KCADV is a member of KICH. This entity is consulted year-round and is also a partner. |

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

There were no agency types not consulted or provided an opportunity to consult.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|---|------------------------------|---|
| Continuum of Care | Kentucky Housing Corporation | Both plans focus on the priority populations and activities including Home Together, the Federal Strategic Plan to end Homelessness (Chronically Homeless, Veterans, Families with Children and Unaccompanied Youth). ESG funds and CoC funds both give local scoring preference to agencies that target funds to be used for those populations. Additionally, Rapid ReHousing continues to be encouraged as a successful housing delivery method under both federal funding sources. |
| Comprehensive Economic Development Strategy | Area Development Districts | This plan is updated annually and coordinates with other economic development strategies undertaken by the Cabinet for Economic Development. |

Table 3 - Other local / regional / federal planning efforts

Narrative

Kentucky cooperates and coordinates with units of general local government extensively regarding the CDBG program. These contacts and relationships include, but are not limited to:

- Conference round tables and the Kentucky Local Issues Conference, Kentucky Association of Counties, and Kentucky League of Cities meetings
- Meetings with Area Development District Directors, including CDBG guidelines training Information on the Department for Local Government web site contains information related to CDBG, and is accessible to local governments to aid in project planning and application submission
- The annual Public Hearing held by KHC for the Action Plan, as well as the CDBG annual hearing held with the Legislative Research Commission also acts to coordinate implementation of the program.

KHC's legislation includes provisions for statutory advisory committees, including the statewide Housing Policy Advisory Committee (HPAC) and Affordable Housing Trust Fund (AHTF) Advisory Committee. These committees include representatives from state government, the federal government, nonprofit and for-profit agencies, service agencies, homeless agencies, community housing development organizations (CHDOs), agencies who serve the homeless, and housing industry professionals. KHC encourages all members of these advisory bodies to participate in the process, provide needs and market data, and to assist KHC in soliciting feedback from other agencies and the public.

KHC has also hosted numerous developer forums specific to multifamily housing. These forums are routinely attended by between 30 and 50 people representing developers, service providers, investors, and other partners in housing development and preservation.

AP-12 Participation - 91.115, 91.300(c)

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

Prior to final development of the Action Plan, KHC and DLG held a public hearing to obtain views of citizens, public agencies, and other interested parties on community and housing needs. The hearing was advertised at least 14 days in advance of the date of the hearing and was publicized using direct electronic mail notification, web announcements, social media announcements, and newspaper advertisements, including two Spanish-language publications. At this hearing, KHC and DLG presented information regarding the amount of assistance the State expects to receive and the range of activities that may be undertaken. KHC also held a public comment period after drafting the Action Plan from May 1 through May 31.

In April 2020, KHC and DLG received notice of additional funding authorized under the CARES Act A. Per HUD waivers issued March 31, 2020, Items 8 and 9 of the Memorandum waive the normal 30-day public comment period. The waiver allows for a five-day abbreviated public comment period. KHC and DLG plan observed this guidance. KHC issued a public notice of a public comment period on May 11, 2020. The public comment period was held May 11 through May 19, 2020.

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 | Newspaper Ad | <p>Minorities</p> <p>Non-English Speaking - Specify other language: Any</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>General Public</p> | <p>Advertised for public hearing for the Action Plan via newspaper ads and eGram service to a list of over 28,000 subscribers. Advertisement included information for those with disabilities, stating the facility is accessible. Also included information for those who do not speak English who may request an interpreter. The notices were also placed in Al Dia and El Kentubano.</p> | None | None | |
|---|--------------|--|--|------|------|--|

| | | | | | | |
|---|-------------------|------------------------------|---|---|------|--|
| 2 | Internet Outreach | Non-targeted/broad community | <p>Advertised for public hearing for the Action Plan via newspaper ads and eGram service to a list of 5,500 subscribers. Advertisement included information for those with disabilities, stating the facility is accessible. Also included information for those who do not speak English who may request an interpreter.</p> | <p>During the public comment period, KHC received written comments from partners. Partners recommended designing a program that empowers communities to address housing needs and continued investment in CHDOs. Partners expressed interest in leveraging NHTF for rental housing development for very low income housing in Kentucky. As with the public hearing, partners encouraged KHC to be flexible and offer different program options and guidelines. Partners asked that KHC consider giving priority to projects located in Promise Zones. Partners also ask DLG to consider addressing housing deficiencies in ARC counties, for example, in Lewis County, and encouraged continued funding for programs such as Recovery Kentucky. Partners commented that there should be sufficient HOME TBRA funding to fill gaps in rural areas and recommended an increase in the HOME TBRA allocation. Partners agreed that the Housing Policy Advisory Committee (HPAC) should play a broader role in recommending solutions and providing guidance to KHC. Partners commended KHC for coordinating programs and committing to the reduction of regulatory barriers and urged KHC to mind the need for a balance HOME allocation.</p> | None | |
|---|-------------------|------------------------------|---|---|------|--|

| 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 | Direct email contact | Minorities Non-English Speaking - Specify other language: Any | Sent direct email to the Governor's Office of Minority Empowerment. Information was shared about the public hearing. | None | None | |

| 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) |
|------------|------------------|------------------------------|---|--|--|---------------------|
| 4 | Public Hearing | Non-targeted/broad community | <p>Advertised for public hearing for the Action Plan via newspaper ads and eGram service to a list of over 28,000 subscribers. Advertisement included information for those with disabilities, stating the facility is accessible. Also included information for those who do not speak English who may request an interpreter.</p> | <p>At the public hearing, representatives from KHC and DLG presented information on each program area. The partner agency representatives who attended commented with their appreciation for using HOME funds for homebuyers and shared that they would like to see and urge KHC to take a balanced approach to allocations. Partners commented that they understand there is no one size fits all approach and encouraged KHC to offer different options to partner agencies.</p> | None | |

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

In addition to newly allocated block grant funds, an estimate of program income and recaptured funds from prior years are included in each year's allocation plan. Total allocations to activities may not equal total expected resources, because administrative funds, CHDO operating funds, and contingency funds are not included in allocations to activities.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 25,412,718 | 883,377 | 0 | 26,296,095 | 26,296,095 | CDBG allocations vary from year to year. The expected amount available for the remainder of the Consolidated Plan is an estimate and may change. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 12,618,284 | 645,935 | 708,460 | 13,972,679 | 13,972,679 | HOME funds continue to be in danger of being cut and the expected amount of funding for future years is an estimate and may change. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOPWA | public - federal | Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA | 791,609 | 0 | 0 | 791,609 | 791,609 | During the coming years, it is anticipated that the state allocation will continue to increase due to the passage of the Housing Opportunities Through Modernization Act of 2016 (HOTMA). In Program Year 2018, Kentucky received a 13% increase in HOPWA entitlement funding from Program Year 2017. It is anticipated that Program Year 2019 funding will increase by approximately 4%. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 2,454,966 | 0 | 0 | 2,454,966 | 2,454,966 | The 2017 allocation included a one-time additional allocation of over \$700,000 dollars. The 2019 allocation returned to the regular, formula based-allocation. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HTF | public - federal | Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership | 0 | 0 | 0 | 0 | 0 | |
| Other | public - federal | Admin and Planning Overnight shelter Rapid re-housing (rental assistance) Services Other | 23,404,450 | 0 | 0 | 23,404,450 | 23,404,450 | ESG-CV funds will be used to fund emergency shelter (including temporary shelter), rapid rehousing, and homelessness prevention. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - federal | Admin and Planning Rental Assistance STRMU Supportive services TBRA Other | 129,762 | 0 | 0 | 129,762 | 129,762 | HOPWA-CV funds will be used to increase allocations to existing HOPWA formula grantees to provide additional TBRA and STRMU funding, cover associated administrative costs, and will allow budget modifications to allocated funds on an as needed basis to the leasing line item to support short-term hotel/motel vouchers should clients need to isolate due to a COVID-19 infection. |
| Other | public - federal | Multifamily rental new construction Multifamily rental rehab | 3,000,000 | 0 | 0 | 3,000,000 | 9,000,000 | Housing Trust Fund, multifamily housing for extremely low-income and very low-income households. National HTF funding is a federal resource. The amount of funds available for future allocations may vary. |
| Other | public - federal | Other | 32,552,334 | 0 | 0 | 32,552,334 | 32,552,334 | Coronavirus Aid Relief and Economic Stability |

Table 5 - Expected Resources – Priority Table

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

Federal funds will be leveraged with other resources to achieve the objectives of this plan. Matching requirements will be achieved through a variety of methods. Kentucky is fortunate in that a majority of recipients have contributed a large amount of matching funds.

HOME match is provided, in part, via Kentucky Affordable Housing Trust Fund (AHTF) investments in the development and rehabilitation of affordable multi-family and single-family units for rental and homeownership. The investment of AHTF funds and additional matching funds provided by HOME recipients have allowed the state to carry HOME match forward to future years KHC will continue to provide matching funds, if needed. Periodically, the amount of HOME matching funds required is reduced due to high unemployment rates, natural disasters, or other factors determined by HUD. KHC does not anticipate requiring recipients of HOME funding for single-family activities to contribute funds towards the required match in 2019 due to the balance of match funding contributed in previous years. KHC encourages all HOME Program applicants to bring additional resources to their proposed programs. These funds help to extend the reach of HOME funds to assist a greater number of households. Through a competitive application process, applicants for HOME single-family funding are eligible to receive additional points for leveraging additional cash and in-kind funding for their projects.

The block grant programs governed by this Action Plan are allocated by the state through a competitive system. This system provides an incentive for applicants to include leverage and matching funds in the project that count toward federal match requirements. Some programs award points to applicants that propose more than the required leverage and matching funds. This encourages applicants to blend funds with other programs to provide for affordable housing opportunities. Other programs require a set amount of proposed match and/or leverage to be eligible for funding. Applicants are also encouraged to contribute additional funds to their project, including, but not limited to, bank loans and other state and federal grants/loans. KHC and DLG encourage applicants to utilize several sources of funds from the private sector, state programs and local programs, which may be used to assist in meeting HUD matching requirements to increase the amount of funds available to provide affordable housing.

ESG recipients must match the funding provided with an equal value of contributions from other sources. Recipients may include the value of any donated material or building, the value of the lease of a building, staff salaries paid by the grantee, and volunteer time. The recipient may not include funds used to match any previous ESG grant or any other grant. Matching funds will come from a variety of sources, both public and private. NOTE: ESG-CV funds have no match requirement.

HOPWA recipients are not required to meet a minimum match requirement, but recipients must coordinate their funding with the administration of federal and state AIDS service funding. At any time, leverage may be one of the factors used in evaluating and ranking HOPWA proposals.

In general, CDBG applicants receive higher priority for funding if they provide matching funds.

There is no matching funds requirement for national HTF project applicants. However, because these funds constitute the smallest portion of total project costs, matching and leverage funds will be provided by project-based rental assistance, bond financing, low-income housing tax credits, and other financing mechanisms. Non-federal funding will constitute a substantial portion of overall financing, ensuring adequate levels of leveraged funds. Projects proposing to locate in Louisville Metro will be required to leverage private funding that qualifies as HOME match to count toward Louisville Metro HOME match requirements.

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

None.

Discussion

KHC is the administering agency for the Low-Income Housing Tax Credit. This program is coordinated with HOME and other funding, including state Affordable Housing Trust Fund, National Housing Trust Fund and KHC Housing Assistance Funds to produce and rehabilitate the maximum number of affordable rental units possible. Entities applying for tax credits apply for other forms of funding/financing through KHC by way of a consolidated application.

Several additional affordable housing and economic development programs are active in the state of Kentucky although not administered under this plan or by KHC or DLG. Additional agencies and entities that offer programs and funding are:

- Bluegrass State Skills Corporation
- Kentucky Small Business Development Centers
- Department of Behavioral Health, Developmental and Intellectual Disabilities
- Kentucky Economic Development Cabinet
- Fannie Mae
- Federal Emergency Management Agency and Kentucky Emergency Management Agency
- Federal Housing Administration
- Federal Home Loan Bank
- Kentucky Historic Preservation Office
- U.S. Department of Housing and Urban Development
- Kentucky Association of Counties
- Kentucky Department of Veterans Affairs
- Kentucky Domestic Violence Association
- Kentucky Economic Development Finance Authority (KEDFA)
- Kentucky Infrastructure Authority
- Kentucky Justice Cabinet/Department of Corrections
- Kentucky League of Cities
- Kentucky Rural Economic Development Authority
- Kentucky Transportation Cabinet
- USDA Rural Housing Service
- US Small Business Administration
- US Army Corps of Engineers
- US Veterans Administration

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|---------------------------|------------|----------|----------------------------|---------------------------------|--|----------------------|--|
| 1 | HOPWA Activities | 2015 | 2019 | Non-Homeless Special Needs | Non-Entitlement Geographic Area | Homelessness Prevention Other Housing and/or Service Needs Rental Assistance | HOPWA: \$791,609 | Tenant-based rental assistance / Rapid Rehousing: 350 Households Assisted |
| 2 | HOME Homeowner Activities | 2015 | 2019 | Affordable Housing | Non-Entitlement Geographic Area | Production of New Affordable Housing Rehabilitation of Affordable Housing | HOME: \$4,452,342 | Homeowner Housing Added: 38 Household Housing Unit Homeowner Housing Rehabilitated: 19 Household Housing Unit |
| 3 | HOME Rental Assistance | 2015 | 2019 | Affordable Housing | Non-Entitlement Geographic Area | Rental Assistance | HOME: \$2,150,000 | Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|-----------------------------|------------|----------|-----------------------------------|---------------------------------|--|---|---|
| 4 | HOME Multifamily Activities | 2015 | 2019 | Affordable Housing | Non-Entitlement Geographic Area | Acquisition/Rehabilitation of Affordable Housing Production of New Affordable Housing Rehabilitation of Affordable Housing | HOME: \$5,323,153 | Rental units constructed: 15 Household Housing Unit Rental units rehabilitated: 15 Household Housing Unit |
| 5 | ESG Activities | 2015 | 2019 | Homeless | Non-Entitlement Geographic Area | Emergency/Transitional Housing For the Homeless Homelessness Outreach Homelessness Prevention Other Housing and/or Service Needs Rapid-Rehousing | ESG: \$2,454,966 | Homeless Person Overnight Shelter: 4000 Persons Assisted Homelessness Prevention: 1400 Persons Assisted Other: 1900 Other |
| 6 | CDBG Housing | 2015 | 2019 | Affordable Housing | Non-Entitlement Geographic Area | Production of New Affordable Housing Rehabilitation of Affordable Housing COVID-19 Response | CDBG: \$2,900,000 CDBG-CV: \$375,865 | Homeowner Housing Rehabilitated: 30 Household Housing Unit |
| 7 | CDBG Economic Development | 2015 | 2019 | Non-Housing Community Development | Non-Entitlement Geographic Area | Economic Development COVID-19 Response | CDBG: \$5,532,783 CDBG-CV: \$2,663,503 | Businesses assisted: 7 Businesses Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|---|------------|----------|-----------------------------------|---------------------------------|--|---|--|
| 8 | CDBG Public Facilities | 2015 | 2019 | Non-Housing Community Development | Non-Entitlement Geographic Area | Public Facilities COVID-19 Response | CDBG: \$7,732,782 CDBG-CV: \$4,151,833 | Other: 35000 Other |
| 9 | CDBG Services | 2015 | 2019 | Recovery Kentucky Services | Non-Entitlement Geographic Area | Public Services COVID-19 Response | CDBG: \$3,100,000 CDBG-CV: \$2,637,400 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1100 Persons Assisted |
| 10 | CDBG Public Improvements/Infrastructure | 2015 | 2019 | Non-Housing Community Development | Non-Entitlement Geographic Area | Public Improvements/Infrastructure COVID-19 Response | CDBG: \$5,284,771 CDBG-CV: \$4,550,773 | Other: 30 Other |
| 11 | HTF Multifamily Activities | 2015 | 2019 | Affordable Housing | Statewide | Acquisition/Rehabilitation of Affordable Housing Production of New Affordable Housing Rehabilitation of Affordable Housing | Housing Trust Fund: \$3,000,000 | Rental units rehabilitated: 20 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|------------------|------------|----------|---|------------------------------------|-------------------|---|--|
| 12 | COVID-19 Reponse | 2019 | 2019 | Homeless Non-Homeless Special Needs Non-Housing Community Development | Non-Entitlement Geographic Area | COVID-19 Response | ESG-CV: \$23,404,450 HOPWA-CV: \$129,762 | Tenant-based rental assistance / Rapid Rehousing: 600 Households Assisted Homelessness Prevention: 2000 Persons Assisted Other: 1000 Other |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | HOPWA Activities |
| | Goal Description | Provide decent affordable housing to eligible clients and assist in gaining permanent housing or maintaining current housing stability by way of supportive services, case management and financial assistance for housing. |
| 2 | Goal Name | HOME Homeowner Activities |
| | Goal Description | Rehabilitation of owner-occupied housing, new construction, and/or financing of affordable homeowner housing. Includes CHDO activities. |

| | | |
|----------|-------------------------|--|
| 3 | Goal Name | HOME Rental Assistance |
| | Goal Description | Short-term tenant-based rental assistance. |
| 4 | Goal Name | HOME Multifamily Activities |
| | Goal Description | Funds for new construction and/or rehabilitation of multifamily housing units. |
| 5 | Goal Name | ESG Activities |
| | Goal Description | Funds for emergency shelter, homelessness prevention; rapid re-housing, and supportive services for persons experiencing homelessness. |
| 6 | Goal Name | CDBG Housing |
| | Goal Description | <p>DLG hopes to assist in the rehabilitation of 30 housing units during this program year.</p> <p>Goal: To improve the condition of housing and expand fair housing opportunities especially for persons of low and moderate income (LMI).</p> <p>Description:</p> <ul style="list-style-type: none"> a. Encourage the rehabilitation of appropriate existing housing units. b. Encourage the creation of new housing units including adaptive reuse of suitable structures. c. Encourage the purchase and preparation of sites for construction of new housing units for persons of low and moderate income. d. Eliminate blight conditions in residential areas through demolition, code enforcement and related activities. |

| | | |
|----------|-------------------------|--|
| 7 | Goal Name | CDBG Economic Development |
| | Goal Description | <p>The economic development program would like to assist at least seven businesses.</p> <p>Goal: To improve local economies and the economic well-being of the people of Kentucky while protecting the environment.</p> <p>Description:</p> <ul style="list-style-type: none"> a. Encourage private investment that will result in the creation of new jobs, primarily for the unemployed and underemployed. b. Discourage the out migration of businesses that employ and serve the local population |
| 8 | Goal Name | CDBG Public Facilities |
| | Goal Description | <p>The DLG Public Facilities section benefited 57,404 persons last year, well over the goal. The program hopes to have similar numbers this year. DLG expects Public Facilities beneficiaries to exceed 35,000 each year. These are the same beneficiaries described in the public improvements goal.</p> <p>Goal: To improve the quality of life through funding community projects requested by individual communities to enhance community pride and involvement and perpetuate local identity.</p> <p>Description:</p> <ul style="list-style-type: none"> a. Enable local communities to provide services they have determined are important but generally cannot afford. b. Foster a revitalization of community structure to help communities help themselves. c. Promote energy efficiency in new construction and rehabilitation projects especially the use of Energy Star qualified products. |
| 9 | Goal Name | CDBG Services |
| | Goal Description | Goal: provision of public services, including but not limited to those concerned with employment, crime prevention, childcare, health, drug abuse and education. |

| | | |
|-----------|-------------------------|--|
| 10 | Goal Name | CDBG Public Improvements/Infrastructure |
| | Goal Description | <p>Activities funded under this category are included in the public facilities goal and make up a significant portion of the LMI beneficiaries assisted.</p> <p>Goal: To provide public facilities to eliminate conditions which are detrimental to the public health and safety and which thus detract from further community development or which are necessary to meet other essential community needs.</p> <p>Description:</p> <ul style="list-style-type: none"> a. Improve existing public facilities. b. Provide new facilities when warranted by recent population growth or when essential needs exist. |
| 11 | Goal Name | HTF Multifamily Activities |
| | Goal Description | New construction or rehabilitation of existing affordable multifamily rental units for households that are extremely low income or very low income. |
| 12 | Goal Name | COVID-19 Reponse |
| | Goal Description | Provide facilities and services in support of the COVID-19 pandemic response |

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Kentucky’s block grant funds will be distributed throughout the state on a competitive basis for eligible activities through several methods described in the individual program guidelines for each program. Units of local government, nonprofit and for-profit entities will be able to apply for funding to carry out eligible activities. This distribution system allows eligible agencies to apply for funding for activities that will address the priority needs for their local community, as housing and community development needs vary widely across Kentucky. In addition, funds awarded to local communities will also address the needs addressed in the state’s Consolidated Plan.

In addition to local community needs, DLG and KHC have identified the following needs that will be addressed with funding via Kentucky’s formula allocation funds: the need to increase the supply of affordable homeownership and rental units; the need to preserve the existing supply of subsidized rental units; the need to identify permanent housing solutions for persons experiencing homelessness; the need to support local government’s efforts to increase their job/tax base, improve and expand public facilities, and offer services tailored to local needs.

The allocation distribution in the table below is an estimate. Depending upon the types of applications received, DLG and KHC may reallocate funding between eligible activities. The distribution in the table below does not include administrative costs, contingencies for disasters, CHDO operating, and HMIS. CHDO set-aside has been included in homeowner activities, although CHDOs are eligible to apply for funding for all activities.

Funding Allocation Priorities

| | HOPWA Activities (%) | HOME Homeowner Activities (%) | HOME Rental Assistance (%) | HOME Multifamily Activities (%) | ESG Activities (%) | CDBG Housing (%) | CDBG Economic Development (%) | CDBG Public Facilities (%) | CDBG Services (%) | CDBG Public Improvements/Infrastructure (%) | HTF Multifamily Activities (%) |
|-------|----------------------|-------------------------------|----------------------------|---------------------------------|--------------------|------------------|-------------------------------|----------------------------|-------------------|---|--------------------------------|
| CDBG | 0 | 0 | 0 | 0 | 0 | 13 | 20 | 24 | 14 | 29 | 0 |
| HOME | 0 | 24 | 12 | 64 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| HOPWA | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ESG | 0 | 0 | 0 | 0 | 100 | 0 | 0 | 0 | 0 | 0 | 0 |
| HTF | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 100 |

| | | | | | | | | | | | |
|--------------------------|---|---|---|---|---|----|----|----|----|----|---|
| Other CDBG-CV | 0 | 0 | 0 | 0 | 0 | 13 | 20 | 24 | 14 | 29 | 0 |
| Other ESG-CV | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other HOPWA-CV | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Housing Trust Fund | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

Housing priorities are considered equal.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

HOPWA Activities (100% of HOPWA) - Funds are limited to this priority. All will be used to address HOPWA needs.

HOME Homeowner Activities (24% of HOME); HOME Rental Assistance (12% of HOME); HOME Multifamily Activities (64% of HOME) - HOME distributions seek to optimize the impact of HOME funds across the Balance of State. Homeowner and TBRA activities are important, but the greatest priority is on preservation and creation of affordable rental units across the state. If KHC received more HOME funding, the percentage might be recalibrated to fund more homebuyer development and TBRA.

ESG Activities (100% of ESG) - Funds are limited to this priority. All will be used to address ESG needs.

CDBG Housing (13% of CDBG); CDBG Economic Development (20% of CDBG); CDBG Public Facilities (24% of CDBG); CDBG Services (14% of

CDBG); CDBG Public Improvements/Infrastructure (29% of CDBG) - CDBG distributions seeks to optimize the impact of CDBG funds across the Balance of State and to address demand across priorities that far outstrips available CDBG. Funding awarded through the CARES Act will provide facilities and services in support of the pandemic response and recovery.

HTF Multifamily Activities (100% of HTF) - Funds are for the most part limited to this priority. All will be used to address the preservation and/or creation of rental units affordable to extremely low-income households.

Funds are distributed based on an estimate of the types of applications the state expects to receive.

CDBG-CV: CDBG CARES Act funds will in large part be distributed to units of local government. City and County governments may apply for funding from more than one CDBG program area (i.e., one Public Facilities and one Public Services) during the same program year. The Commissioner of DLG reserves the right to: 1) adjust the amount and split of funds; 2) to give higher priority/preference to the areas of highest need; 3) increase awards to existing grantees; 4) release a competitive Notice of Funding Availability (NOFA); 5) make direct grants to new grantees; 6) make other changes, as allowable by HUD, to coordinate with other CARES Act and COVID-19 response planning in Kentucky.

ESG-CV: To ensure geographic coverage across the 118-county Balance of State and best meet citizen and agency emergency needs in a timely fashion, KHC reserves the right to allocate funds by any of these methods: 1) increase awards to existing subrecipients; 2) competitive Notice of Funding Availability (NOFA); 3) direct grants to new subrecipients; 4) administration of direct assistance by KHC staff, if permitted in forthcoming ESG-CV Guidance from HUD; and 5) other methods as allowed by HUD Guidance and Waivers to be issued, as necessary.

HOPWA-CV: KHC plans to increase allocations to existing HOPWA formula grantees.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

Each program covered by this Action Plan has a unique timeline and method for distributing its funds.

Kentucky's block grant funds will be distributed throughout the state on a competitive basis for eligible activities through several methods described in the program guidelines for each program for the purposes of preserving existing affordable housing as well as fostering new affordable housing opportunities. Units of local government, nonprofit, and for-profit entities will be able to apply for funding to carry out eligible activities, subject to the limitations of each program. This distribution system allows eligible agencies to apply for funding for activities that will address the priority needs for their community. In addition, funds awarded to local communities will also address the housing needs outlined in the state's Consolidated Plan. Eligible activities and recipient types for each block grant program are specifically addressed in their distribution plans.

Distribution Methods

Table 8 - Distribution Methods by State Program

| | | |
|---|----------------------------|---|
| 1 | State Program Name: | Community Development Block Grant Program |
| | Funding Sources: | CDBG |

| | |
|---|---|
| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>The HUD CDBG Program provides assistance to communities for use in revitalizing neighborhoods, expanding affordable housing and economic opportunities, assisting with community emergency relief, providing infrastructure, improving community facilities, and providing operational costs for Recovery Kentucky substance abuse centers. With the participation of their citizens, communities can devote these funds to a wide range of activities that best serve their own development priorities.</p> <p>DLG works directly with eligible units of local government in distributing CDBG funds, which are awarded on a competitive basis through an open application process. Local governments are best equipped to understand the needs of their individual communities and, through an open application process, present projects for funding that are ready to proceed. The Commissioner of DLG reserves the right to adjust the amount and split of funds in case of a natural or medical (ex. COVID-19 pandemic) disaster based on an Emergency Declaration by the Governor. The Commissioner also reserves the right, during such a disaster, to give higher priority/preference to the areas of highest need. Additionally, DLG will allow city and county governments to apply for funding from more than one CDBG program area (i.e., one Public Facilities and one Public Services) during the same program year in response to the COVID-19 pandemic. To strengthen gaps in this process, DLG conducts training for local officials and grant administrators. Training acquaints the officials with the regulatory requirements of the program. Information included that assists in ensuring strong applications and successful projects includes environmental requirements, labor standards, procurement standards, fair housing and equal opportunity and concerns related to construction and housing.</p> |
|---|---|

| | |
|---|--|
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>All cities and counties in Kentucky are eligible for participation in the CDBG Program except for the cities of Ashland, Bowling Green, Covington, Elizabethtown, Henderson, Hopkinsville, Owensboro, the City of Lexington/Fayette County and City of Louisville/Jefferson County Metro Government which receive a direct allocation of CDBG funds from the federal government.</p> <p>Applications are reviewed based on the following criteria: need, necessary and reasonable expenditures of funds, and project effectiveness.</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>The CDBG Program Guidelines, including detailed information about each eligible activity, are available at: https://kydlgweb.ky.gov/FederalGrants/CDBG_cities.cfm.</p> |

| | |
|--|------------|
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>N/A</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>N/A</p> |

| | |
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| <p>Describe how resources will be allocated among funding categories.</p> | <ul style="list-style-type: none"> • Public Facilities - \$11,884,615 • Economic Development - \$8,196,286 • Housing - \$5,327,586 • Community Projects - \$5,284,771 • Public Services (Recovery Kentucky) - \$5,737,400 • Community Emergency Relief Fund - TBD based on need <p>Some minor adjustment of the split of funds is possible depending on the actual number of applications and amount requested by applicants. DLG reserves the right to make those adjustments as necessary.</p> <p>The Commissioner of DLG reserves the right to adjust the amount and split of funds in case of a natural or medical (ex. COVID 19) disaster based on an Emergency Declaration by the Governor. The Commissioner also reserves the right, during such a disaster, to give higher priority/preference to the areas of highest need. Additionally, DLG will allow city and county governments to apply for funding from more than one CDBG program area (i.e., one Public Facilities and one Public Services) during the same program year in response to the COVID-19 pandemic . The resulting projects must meet the qualifying factors for Activities Designed to Meet Community Development Needs Having a Particular Urgency. In such instances, funding levels can be adjusted as necessary based on the extent and severity of the emergency.</p> |
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| <p>Describe threshold factors and grant size limits.</p> | <ul style="list-style-type: none"> • Economic Development (Traditional) - \$1,000,000 Individual; \$2,000,000 Multi-Jurisdiction • Economic Development (Non-Traditional) - \$250,000 Individual; \$500,000 Multi-Jurisdiction • Public Facilities - \$1,000,000 Individual; \$2,000,000 Multi-Jurisdiction • Self-Help - \$250,000 Individual; \$500,000 Multi-Jurisdiction • Housing - \$1,000,000 Individual • Community Projects - \$500,000 Individual • Community Emergency Relief Fund (CERF)- Determined on need • Public Services - \$200,000 Individual <p>Each jurisdiction must choose whether to submit a Public Facilities, Housing or Community Project application. Only one application may be submitted per year for the three areas listed above. In addition, an applicant may submit one application in the Public Services program area. A jurisdiction is not limited in the number of applications in the CERF and Economic Development program areas. Only one program area may be applied for per application.</p> |
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| | <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>Recipients must acknowledge that they will be required to submit performance measure information to DLG to meet this reporting requirement. As part of this process, each recipient will be required to complete a Program Completion Report at closeout. Some recipients, due to the nature of their projects (housing rehab and job creation), will report annually.</p> <p>There are three main components of the Performance Measurement System: Objectives, Outcomes and Indicators. Each component relates to a project activity. DLG will assign one of three objectives related to the type of activity, funding source and goal/program intent.</p> <p>Objectives include:</p> <ul style="list-style-type: none"> • Suitable Living Environment • Decent Housing • Economic Opportunity <p>The next step will be selection of an outcome based upon the purpose of the activity.</p> <p>Outcomes include:</p> <ul style="list-style-type: none"> • Improved Availability/Accessibility • Improved Affordability • Improved Sustainability <p>In addition to selecting an objective and outcome for each project activity, certain indicators will be required to be identified and quantified. These indicators vary by program area (CERF, Community Projects, Economic Development, Housing, Public Facilities, and Public Services).</p> |
| 2 | <p>State Program Name:</p> | <p>Emergency Solutions Grant - CV</p> |
| | <p>Funding Sources:</p> | <p>Housing Trust Fund</p> |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>ESG-CV funds will pass-through to partners across the state, augmenting the existing program with new flexibility. KHC will prioritize funding of emergency shelter (including temporary shelter), rapid rehousing, and homelessness prevention. Shelter funding will allow us to best respond to the social separation/isolation needs of shelters and prevent shelter closures.</p> <p>Rapid rehousing funding will allow us to exit persons experiencing homelessness to permanent housing with up to 24 months of subsidy and help respond to the anticipated rise in homelessness accompanying the pandemic.</p> <p>Significant expansion of the homelessness prevention program statewide will enable ESG funds to help keep people housed who may be facing evictions prevented by the moratorium. ESG can pay up to 6 months of rental arrears, including late fees and rental assistance can continue for up to 24 months. Use of Housing First practices will be mandated for any funded project.</p> |
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Eligible activities (24 CFR §576.100-109):</p> <ol style="list-style-type: none"> 1) Emergency Shelter (CARES Act allows temporary shelter) 2) Street Outreach 3) Rapid Rehousing 4) Homelessness Prevention 5) Housing Relocation and Stabilization Services (within Rapid Rehousing) 6) Homelessness Management Information System (HMIS) costs 7) Administration (10% under CARES Act) <p>Client eligibility:</p> <ol style="list-style-type: none"> 1) Street outreach and emergency shelter services- homeless as defined by 24 CFR §576.2 2) Rapid Rehousing- categories 1 and 4 of the homeless definition and residing in an emergency shelter other place unfit for human habitation 3) Homelessness prevention-household income <50% area median income and at risk of homelessness as defined by 24 CFR §576.2 (CARES Act prevention funds allow for a higher income limit than other ESG funds.) |

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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>N/A</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>To ensure geographic coverage across the 118-county Balance of State and best meet citizen and agency emergency needs in a timely fashion, KHC reserves the right to allocate funds by these methods:</p> <ol style="list-style-type: none"> 1) increase awards to existing subrecipients; 2) competitive Notice of Funding Availability (NOFA); and 3) direct grants to new subrecipients. 4) administration of direct assistance by KHC staff, if permitted in forthcoming ESG-CV Guidance from HUD; and 5) other methods as allowed by HUD Guidance and Waivers to be issued, as necessary. |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>N/A</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>100 percent of ESG-CV Act funds will be used for pandemic response and recovery.</p> |

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| <p>Describe threshold factors and grant size limits.</p> | |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>The level of severity of the pandemic in the community is not fully known at this time. The number of confirmed cases and individuals and families affected by the health and economic challenges is expected to rise as testing becomes more readily available. To best assist the residents of the state, KHC will place a high priority on providing facilities and services in support of a coordinated pandemic response. KHC will ensure:</p> <ul style="list-style-type: none"> • Compliance with activity requirements established in 24 CFR §576.100-107. • Compliance with all program requirements established by 24 CFR §576.400-409, including other federal requirements as established by §576.407. • Compliance with all administrative requirements established by 24 CFR §576.108 and §576.500. • Compliance with 2 CFR §200, except where superseded by program regulations. • ESG plan submitted via the HUD Sage HMIS Reporting Repository the as part of KY’s Consolidated Annual Performance and Evaluation Report (CAPER) to HUD for entitlement funding (CDBG, HOME, ESG, HOPWA). Each ESG project must submit data via Sage. • Homeless Management Information System (HMIS) client data entry. • The CARES Act waived the statutory match requirement. |
| <p>3 State Program Name:</p> | <p>Emergency Solutions Grant Program</p> |
| <p>Funding Sources:</p> | <p>ESG</p> |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>ESG is designed for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.</p> |
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>In 2017, KHC implemented a new process whereby annual ESG funding would be awarded through a competitive application process every two years. KHC will again use a competitive two-year funding round to award 2019 and 2020 ESG funds. Applicants selected for funding through the 2019 competition will be eligible for renewal in 2020, assuming funds are available. Applicants will be evaluated on such areas as: local needs, applicant experience/capacity/performance, project design, community coordination, and other factors. Recipients receiving renewal funding in 2019 and 2020 will be required to address Impediments to Fair Housing and how they will address and help eliminate fair housing impediments. In 2019, KHC will most heavily consider an applicant’s capacity, project design, and community collaboration efforts.</p> <p>In the event recipients funded in 2019 elect not to renew funding in 2020 or if the 2020 allocation is larger than the 2019 allocation, KHC reserves the right to award excess funds proportionately to the remaining renewal projects or to other special initiatives, such as Coordinated Entry, to meet Continuum of Care established goals and objectives.</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>N/A</p> |

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| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Through a competitive application process, KHC will make ESG funds available to eligible non-profits and local governments from the 118 counties in Kentucky that do not receive a direct allocation of ESG as an entitlement area. All funds will be obligated to sub-grantees within 60 days of the date KHC enters into its funding agreement with HUD. KHC accepts applications from all eligible applicants (including first-time applicants and faith-based groups).</p> <p>KHC will use a two-year competitive funding cycle beginning in in federal fiscal year 2019, whereby programs that receive funding in FFY 2019 will be eligible for renewal in FFY 2020 so long as certain thresholds are met and assuming funds are available from HUD. This is intended to allow for more program consistency for clients accessing services and will allow programs the opportunity to plan beyond one year. In the event the 2020 formula allocation is greater than 2019 or if 2019 recipients elect not to renew their projects in 2020, KHC reserves the right to determine the most effective process for redistribution, which may include another competitive process, a proportional distribution, or another method deemed most judicious at the time.</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>N/A</p> |

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| <p>Describe how resources will be allocated among funding categories.</p> | <p>To reduce the time that families and individuals remain homeless, shorten the length of stay in the homeless system, and prevent homelessness from occurring, it is important to dedicate the resources necessary to achieve those outcomes. With the implementation of the BoS Coordinated Entry System, it is important to consider the unique needs of local prioritization areas where collaboration is occurring. The BoS Coordinated Entry System is being implemented by utilizing smaller groupings of counties (e.g. area development districts) that work together to pool resources to serve those with the highest needs and divert people from the system as appropriate. Some already have RRH resources through the CoC program while other areas may not. Some areas may need more street outreach or prevention resources based on their configuration of existing community resources. In the 2019 ESG competitive allocation, KHC will strongly emphasize RRH, but it encouraged local areas to request the funding components most needed in their communities and justify such a decision accordingly. Agencies awarded funding through the 2019 formula allocation will be eligible to renew funding for these same activities in 2020.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>As previously stated, 2019 ESG funding will be distributed to recipients through a competitive funding round.</p> <p>No single application will be able to request more than \$150,000 of the total amount of funds available. The only time a single applicant can submit more than one application is if the project's facilities are located in different counties. No more than two applications will be accepted from any single applicant.</p> <p>KHC will make every effort to award limited resources as prudently as possible and select those agencies with the greatest capacity to effectively administer the funds. The amount of funds awarded will depend on how well an application scores as well as the other considerations such as expenditure rates of 2017 and 2018 ESG funding by each agency. KHC will select projects based on project viability, applicant capacity, performance, community collaboration, and program design. It is our goal to achieve as much geographic distribution as possible, while ensuring that the strongest applications receive funding based on their total scores.</p> |

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| | <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>The distribution of funds is intended to allow partners to most effectively make progress towards the CoC’s goal of homelessness being rare, brief, and non-recurring in the Balance of State. The primary outcomes KHC will monitor will be those established by HUD as part of the CoC System Performance Measures that are relevant to ESG programs, which includes:</p> <ul style="list-style-type: none"> • Reduction in the average and median length of time persons remain homeless; • Reduction in the percent of persons who return to homelessness; • Reduction in the number of persons who are homeless; • Number of persons who become homeless for the first time; • Successful placement from Street Outreach; and • Successful placement in or retention of Permanent Housing <p>KHC will also focus on outcomes established in Home Together: The Federal Strategic Plan to End Homelessness, which calls for coordinated efforts to end homelessness for veterans, youth, families, and chronically homeless in addition to persons experiencing homelessness overall.</p> <p>Through implementation of the KY BoS CoC’s Coordinated Entry System, partners will focus on moving people as quickly as possible from the streets and emergency shelters into permanent housing and making sure limited permanent housing resources are used for those persons with the highest level of need. Data from this process will inform where the CoC has gaps in needed services (e.g. areas that need more RRH or less RRH and more PSH) so that programs can reallocate resources or make other program adjustments to improve outcomes for persons in need.</p> <p>In addition, HUD offered numerous COVID-19 related waivers in a memorandum dated March 31, 2020 that offer program flexibility and via an additional memorandum issued May 22, 2020. KHC requested these waivers on April 3, 2020, in response to the first memorandum and on May 27, 2020, in response to the second. The requested waivers went into effect two days after submission.</p> |
| 4 | <p>State Program Name:</p> | <p>HOME Investment Partnerships Program</p> |
| | <p>Funding Sources:</p> | <p>HOME</p> |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>Possible activities eligible for funding include, but are not limited to:</p> <ul style="list-style-type: none"> • Rehabilitation for homeowner, home buyer or rental properties • Acquisition, including down payment and closing cost assistance • New construction or preservation of rental or home buyer properties • Tenant-based rental assistance • Demolition in conjunction with rehabilitation or new construction • Reconstruction housing • Adaptive reuse • Homeless assistance (restricted to housing development activities for transitional or permanent housing, and tenant-based rental assistance) <p>KHC may undertake additional activities permitted by federal regulation. Assistance may be provided for rental housing or to promote homeownership. Any activity that qualifies under the HOME Final Rule, Sections 24 CFR 92.205-209, may be financed by the state HOME Program, provided it is consistent with the Consolidated Plan and this Action Plan. KHC may hold a portion of its HOME allocation as a contingency for disasters and other emergencies as declared by the governor. These funds may be used for TBRA for displaced households.</p> |
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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Eligibility to apply for HOME funds will be no more restrictive than that required by HUD regulations. In addition to meeting basic eligibility criteria, additional minimum threshold requirements may be set by KHC during each funding round. These thresholds will be outlined in specific funding round application guidelines. Applications may be submitted for homeownership, tenant-based rental assistance and rental activities. Announcements of funding availability will be announced via KHC's eGram web service.</p> <p>Applications may be evaluated on factors such as: performance measures; project need/demand; financial design and feasibility; project design; capacity of the development team; and readiness to proceed. KHC will make every effort to work with applicants and offer technical assistance when completing an application. After an application is given a conditional commitment of funding, the applicant must submit necessary technical submission items to receive a full release of funds. In the event a recipient has not satisfactorily performed under the terms of a prior written agreement with KHC, KHC reserves the right to not accept subsequent applications.</p> <p>Plan for determining compliance with the 95 percent median purchase price 92.254(a)(2)(iii):</p> <p>The Final Rule published on July 24, 2013, established new homeownership value limits for the HOME program. These new limits apply to homeownership housing when HOME funds are committed on or after August 23, 2013 and remain in effect until HUD issues new limits. KHC will fully comply with the 95 percent median purchase price limits established annually by HUD.</p> <p>For existing housing, the new HOME homeownership value limit is the greater of the 95 percent of the median purchase price for the area based on Federal FHA single-family mortgage program data and other appropriate data that are available nationwide for sale of existing housing in standard condition, or the minimum limit (or floor) based on 95 percent of the statewide, nonmetropolitan area median purchase price using this data. This limit encompasses the total purchase/rehabilitation price, regardless of source of financing. KHC will use the Homeownership Value limits released by HUD annually at:</p> <p>HOME Maximum Purchase Price/After-Rehab Value - HUD Exchange</p> |
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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>N/A</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>N/A</p> |

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| Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only) | N/A |
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| <p>Describe how resources will be allocated among funding categories.</p> | <p>KHC cannot predetermine the use of HOME funds by activity. The amount of funds allocated for each activity will be based on the nature of applications received by KHC, the criteria described in the application process and the extent to which proposals are consistent with the priorities identified in this plan. KHC will make every attempt to distribute funds geographically, contingent upon overall housing demand.</p> <p>KHC has estimated the distribution of funds by activity based on anticipated funds and has included program income and recaptures. The distribution may change based on actual demand by activity. KHC anticipates that FFY2019 funds will be distributed approximately as follows (as of the date of publication for comment, HUD had not announced funding):</p> <ul style="list-style-type: none"> • Homeowner activities, including new construction, rehabilitation, and acquisition/rehabilitation/resale - \$4,000,000. This includes CHDO set-aside funds. • Tenant-Based Rental Assistance - \$1,750,000 • Rental Production/Rehab - \$7,000,000. <p>Please note that KHC will also utilize program income, reprogrammed administrative funds and carryover funds from prior years, recaptured funds and matching funds provided by KHC (if any) as necessary to support these home activities. Additionally, if necessary, KHC reserves the right to adjust funding levels between these activities as determined by KHC. KHC may allocate funding on a contingency basis for disasters and emergencies as declared by the governor. It is anticipated that these funds would be used to provide short term rental assistance to displaced families.</p> <p>CHDO operating funds, administrative funds and disaster contingencies are not included in the above allocations toward eligible activities.</p> |
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| <p>Describe threshold factors and grant size limits.</p> | <p>KHC imposed performance-based thresholds for HOME funds. Applicants will be required to meet annually-established expenditure and commitment thresholds as spelled out in application guidelines prior to application submission.</p> <p>In FFY2019, KHC will allow eligible applicants to request up to \$500,000 of HOME funds for multifamily activities unless the project was preapproved for additional funding, and \$400,000 for single-family activities. KHC will allow eligible applicants to request a maximum of \$400,000 of HOME funds during an application round. The amount may decrease depending on the amount of available HOME funds. KHC may impose a smaller amount for first time applicants, or applicants with limited experience. KHC may allow higher amounts for multifamily projects utilizing tax-exempt bonds or based on the size and complexity of projects. In addition, KHC reserves the right to allow single-family and TBRA activities to request higher amounts if it is necessary to fully distribute HOME funding.</p> <p>Additionally, KHC will review the capacity of applicants and may require applicants for HOME funds to meet a minimum capacity score to be eligible for funding. Consideration will be given to factors such as past performance, current debt obligation to KHC and compliance with past funding.</p> <p>KHC will reserve a minimum of 15 percent of the total amount of HOME funds received for Community Housing Development Organizations (CHDOs). CHDOs apply to KHC to develop, sponsor or own projects and will be eligible to undertake any eligible activity in accordance with 24 CFR Part 92 Subpart G. Due to the extensive network of nonprofit housing providers in the state, KHC anticipates that the annual participation of CHDOs will exceed 15 percent of total HOME funds. To apply for funds from the CHDO set-aside, an organization must be eligible to be a CHDO. KHC does not accept certifications of other participating jurisdictions.</p> <p>KHC will evaluate the performance of any eligible organization wishing to receive CHDO designation at the time of application. If the organization is successful in the application process and is deemed a CHDO, CHDO operating funds may be awarded. CHDO operating funds will be provided on a year-by-year basis provided funds are available and the CHDO has demonstrated acceptable performance. To document its performance and be eligible to receive operating funds, the CHDO must provide semi-annual progress reports. CHDO operating funds are awarded on a yearly basis coinciding with KHC's fiscal year. Draw requests for eligible expenditures may be made on a calendar quarter reimbursement.</p> |
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| | | <p>KHC has imposed a maximum direct homebuyer subsidy cap of \$40,000 per unit for and a maximum development gap subsidy cap of \$25,000 for HOME-funded homeownership activities. However, KHC reserves the right to allow subrecipients to exceed this maximum with prior written approval. All HOME funds used for homeownership activities will be required at a minimum to meet the HOME affordability period as established in 24 Part 92.254. Additional guidance on maximum subsidy cap and affordability periods will be detailed in the 2019 Single Family Development and AHTF Home Repair NOFA Competitive Application Guidelines Scoring Criteria as well as the KHC 2019 KHC Single-Family Homebuyer Development Policy Manual.</p> |
| | <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>KHC anticipates that due to the capacity and threshold requirements, there may be fewer applicants for funding, but by increasing the allocation amounts, applicants with greater capacity will be awarded funds. This will also allow KHC to meet newly imposed expenditure deadlines imposed with the new HOME regulations in effect after August 23, 2013.</p> <p>Outcome measures include availability/affordability/accessibility of decent affordable housing.</p> <p>In addition, HUD offered numerous COVID-19 related waivers for the HOME program in two a memoranda dated April 10, 2020: one for the HOME program overall, and one specifically for HOME Tenant-Based Rental Assistance. These waivers offer program flexibility needed to adequately respond to COVID-19. KHC requested these waivers on April 16, 2020, and they into effect two days after the waiver request submission.</p> |
| 5 | <p>State Program Name:</p> | <p>HOPWA - CV</p> |
| | <p>Funding Sources:</p> | |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>HOPWA-CV funds will augment the existing program with new flexibility by increasing allocations to existing HOPWA formula grantees. KHC will award funding to existing HOPWA formula subrecipients:</p> <ol style="list-style-type: none"> 1. AIDS Volunteers of Lexington (AVOL) (71-county service area) 2. Heartland CARES (Paducah, 27-county service area) 3. Matthew 25 AIDS Services (Henderson, 15-county service area) <p>CARES Act HOPWA funding will be limited to tenant-based rental assistance (TBRA) and Short-term rent, mortgage & utility (STRMU) payments to prevent homelessness (plus administrative costs). On an as-needed basis, KHC will also allow subrecipients to allocate funding via budget modifications to the leasing line item to support short-term hotel/motel vouchers should clients need to isolate due to a COVID-19 infection.</p> |
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Eligible activities (24 CFR §574.300):</p> <ol style="list-style-type: none"> 1) Short-term rent, mortgage & utility (STRMU) payments to prevent homelessness 2) project or tenant-based rental assistance 3) supportive services 4) housing information services 5) resource identification to establish, coordinate and develop housing assistance resources 6) operating costs 7) lease of facilities to provide housing and services; 8) administration (3%) <p>Eligible beneficiaries (24 CFR §574.3):</p> <p>Low-income persons (<80% area median income) medically diagnosed with HIV/AIDS and their families</p> |

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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>N/A</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>N/A</p> |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>KHC plans to increase allocations to existing HOPWA formula grantees.</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>100 percent of HOPWA CARES Act funds will be used for pandemic response and recovery.</p> |

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| <p>Describe threshold factors and grant size limits.</p> | |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>The level of severity of the pandemic in the community is not fully known at this time. The number of confirmed cases and individuals and families affected by the health and economic challenges is expected to rise as testing becomes more readily available. To best assist the residents of the state, KHC will place a high priority on providing facilities and services in support of a coordinated pandemic response. KHC will ensure:</p> <ul style="list-style-type: none"> • Compliance with program standards established in 24 CFR §574.310-350. • Compliance with administrative requirements established by 24 CFR §574.500-540 and other federal requirements established by §574.600-660). • Compliance with 2 CFR §200, except where superseded by program regulations. • Separate HOPWA plan as part of Kentucky’s Consolidated Annual Performance and Evaluation Report (CAPER) to HUD for entitlement funding (CDBG, HOME, ESG, HOPWA). • Homeless Management Information System (HMIS) client data entry. |
| <p>6 State Program Name:</p> | <p>Housing Opportunities for Persons with AIDS</p> |
| <p>Funding Sources:</p> | <p>HOPWA</p> |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>Any activity that qualifies under the HOPWA federal program rules may be awarded by KHC through the federally funded state HOPWA Program, provided it is consistent with the Consolidated Plan and this Action Plan. Activities eligible for funding include Tenant-Based Rental Assistance; Short-Term Rent, Mortgage, and/or Utilities; Supportive Services; Resource Identification; Housing Information Services; Permanent Housing Placement; and Administrative Fees.</p> <p>KHC reserves the right to further restrict any of the HOPWA program guidelines, as approved by HUD.</p> |
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>HOPWA applications are received through a competitive process using KHC’s online application software. Applicants are scored on criteria such as: performance measures, previous compliance and/or program issues, reporting, project need, geographic coverage, and agency experience. Agency experience administering HOPWA and the number of people anticipated to be served in relation to the number of people living with HIV/AIDS in the agency’s service area as reported by the Kentucky Cabinet for Health and Family Services in its HIV/AIDS Surveillance Report are the most important criteria considered during the application review. Agencies that do not have previous HOPWA experience are able to gain back points on the application for prior experience administering other federal housing programs and describing how that experience will help them successfully administer a HOPWA program. Applications are available every three years through a competitive application process with an annual renewal allocation of funding based on the same performance measures as in the original application as well as expenditure rates, compliance issues and capacity. 2017 was the first year of the most recent three-year competitive application. Therefore, recipients awarded funding through the 2017 allocation will be eligible to renew funding without completing a competitive application in 2019. KHC reserves the right to adjust the amount of funding each agency receives in 2019 based on their rate of spending for the 2018 allocation and any significant changes in the number of persons living with HIV/AIDS in an agency’s service area. KHC allows recipients 24 months to spend each annual allocation.</p> |

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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>N/A</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>N/A</p> |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>As described earlier in this section relating to the how funds are allocated and the criteria used to select project sponsors, KHC utilizes a competitive application process every three years that is open to all eligible applicants, including grassroots faith-based organizations and other community-based organizations. To be eligible to apply for funding, an organization need only meet the eligibility criteria established by HOPWA statute and regulations. KHC advertises the availability of applications on its website and notifies the public via electronic newsletters. One of the three organizations currently funded with HOPWA funds and eligible for renewal through the 2019 allocation is Matthew 25 AIDS Services, which was established by the Zion United Church of Christ in Henderson, KY.</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>While KHC has not established minimum or maximum funding amounts by category, in general, most agencies request the largest amount of funding for STRMU, TBRA, and services. Housing assistance in the form of long- and short-term rent subsidies continues to be in high demand in all areas of the state.</p> |

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| <p>Describe threshold factors and grant size limits.</p> | <p>At this time, threshold limits are not restricted. The amount of funds allocated for each activity will be based on the nature of applications received by KHC. KHC will make every attempt to distribute funds geographically, contingent upon overall application submission scoring.</p> <p>KHC will utilize carryover funds from prior years and/or recaptured funds as necessary to meet the objectives of the state.</p> | | | | |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>HOPWA programs will be evaluated based on the outcome measures currently identified in the HUD 40110-D CAPER (Housing Status at program exit, reduced risk of homelessness and access to care and support), with emphasis on housing status at program exit.</p> <p>Because the housing portions of STRMU and TBRA are where most of the funds are utilized, the housing results will be most important.</p> <p>In addition, HUD offered numerous COVID-19 related waivers in a memorandum dated March 31, 2020, that offer program flexibility and via an additional memorandum issued May 22, 2020. KHC requested these waivers on April 3, 2020, in response to the first memorandum and on May 27, 2020, in response to the second. The requested waivers went into effect two days after submission.</p> | | | | |
| <p>7</p> | <table border="1"> <tr> <td data-bbox="233 1140 615 1193"> <p>State Program Name:</p> </td> <td data-bbox="615 1140 1904 1193"> <p>National Housing Trust Fund</p> </td> </tr> <tr> <td data-bbox="233 1193 615 1250"> <p>Funding Sources:</p> </td> <td data-bbox="615 1193 1904 1250"> <p>HTF</p> </td> </tr> </table> | <p>State Program Name:</p> | <p>National Housing Trust Fund</p> | <p>Funding Sources:</p> | <p>HTF</p> |
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| <p>Funding Sources:</p> | <p>HTF</p> | | | | |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>The National Housing Trust Fund (HTF) program will be used to finance the construction or rehabilitation of affordable rental housing whose units receive rental subsidy. Activities eligible for funding include demolition in conjunction with rehabilitation or new construction, adaptive reuse of an existing structure into affordable rental units, new construction of affordable rental units, and rehabilitation of existing rental units.</p> <p>KHC may fund additional activities permitted by federal regulation. Activities that qualify under the HTF Rule, Sections 24 CFR 93.200 – 203, may be financed by the HTF Program, provided it is consistent with the Consolidated Plan, this Action Plan, and any NOFA or QAP issued to award HTF funds, as they may be amended from time to time.</p> <p>Eligible recipients will be multifamily housing developers who meet KHC's capacity threshold and who meet the criteria for successful applications for funding for new construction or rehabilitation of affordable multifamily projects in Kentucky. Capacity is based on experience and capacity, compliance monitoring history, financial management, and additional criteria related to the status of projects in process, uncorrected compliance findings or concerns (if any), success of current projects/properties, and credit rating of members of the development team.</p> <p>KHC supports development teams that have successfully undertaken multifamily development or preservation projects for affordable housing utilizing tax-exempt bonds during the preceding five years. Application submissions will be in response to the 2020 Tax-Exempt Bond NOFA, as well as 2020 Low Income Housing Tax Credit (LIHTC) Funding Round. Notification that applications are being accepted will be made via KHC's eGram service. The LIHTC application is competitive. In addition to the bond and housing credits allocated, successful applicants may be funded from other available sources for multifamily housing, including HOME and state Affordable Housing Trust Fund.</p> <p>LIHTC applications will be reviewed and scored during the competitive process. The development team information received will be reviewed to ensure the development team has the capacity and financial strength to develop, construct and manage a LIHTC project. KHC's credit committee will meet to discuss and prioritize each response according to the final score and available credit.</p> |
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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>KHC will focus on projects with some form of project-based rental assistance. Projects that have the highest scores based on the scoring criteria established for the 2020 LIHTC Funding Round will be considered for funding.</p> <p>Respondents must meet the requirements of the 2019-2020 Qualified Allocation Plan (QAP) and 2019 Multifamily Guidelines located at: http://www.kyhousing.org/Development/Multifamily/Pages/Applications-Guidelines-Scoring.aspx.</p> <p>Projects utilizing tax-exempt bond financing must engage an attorney or attorneys who: have acted as bond counsel or counsel for the bond trustee, bond purchaser, or the borrower in connection with at least one KHC multifamily bond issue within the previous five years; or can demonstrate a comprehensive understanding of KHC’s general bond policies and procedures. Also, funds will only be available to projects that have not yet received or applied for an allocation of Tax-Exempt Bonds.</p> <p>Projects must be completed and placed in service no later than 36 months after the date of the closing of all KHC funds.</p> <p>All projects must clearly address one or more impediments to fair housing. Respondents must identify fair housing impediments in KHC’s Analysis of Impediments to Fair Housing (AI). If the project is in a HOME participating jurisdiction, the project must also address one or more impediments in the local jurisdiction’s AI.</p> <p>Project Characteristics - projects that preserve multifamily property; adaptively reuse a building as affordable housing; new construction projects that are part of a Community Revitalization Plan and the community has dedicated funding to support the plan. Projects that have project-based Section 8 or other rental subsidy for at least 75 percent of units across the collective project.</p> <p>Market Absorption and Market Capture Requirements - all projects, define and justify the absorption period, absorption rate and capture rate for the property noting when the project is expected to achieve 93 percent occupancy. Capture rates and absorption rates are required to recognize other funded projects in its market study review. In the event two or more projects are submitted from the same geographical region, KHC staff will determine, through market study reviews, that the targeted market for that region</p> |
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| | will be able to absorb each project, noting the impact that capture rates and market absorption will have on existing and proposed projects in the area also funded by KHC. Market study considerations may cause a property or a project to be denied funding or have funding reduced during the application and technical submission phase. |
| If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only) | N/A |
| Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only) | N/A |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>N/A</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>The single funding category for this program is the production of new multifamily housing or rehabilitation of existing multifamily housing for households who are extremely low income (or very low income in years where adequate funding allows for more than one income level to be served under the program regulations.)</p> |

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| <p>Describe threshold factors and grant size limits.</p> | <p>Pursuant to HUD Notice 15-003, Interim Policy on Maximum Per-Unit Subsidy Limits for the HOME Program, KHC has elected to utilize the per-unit limits provided by the Louisville HUD Field Office on June 4, 2018 (included in the HTF Allocation Plan attached to this Action Plan) that establishes the following per unit maximum:</p> <p>0 Bedroom - \$147,074 1 Bedroom - \$168,600 2 Bedroom - \$205,018 3 Bedroom – \$265,229 4+ Bedroom – \$291,137</p> <p>There is no maximum award amount associated with this program.</p> <p>KHC will make every effort to distribute HTF funds geographically. The ability to do so may be limited by the location of eligible applicants and projects that receive adequate scoring to be funded. Projects must be completed within 36 months of the date of the award of HTF funds. Recipients must present a project timeline demonstrating the ability to close on all funds requested, including any bond transaction, by the end of May 2020.</p> <p>KHC’s NHTF program includes a requirement that assisted units also include rental subsidy. The exception may be if funds remain unallocated after the issuance of a NOFA for NHTF funds. A second funding round to allocate remaining funds may not include this provision.</p> <p>KHC’s program includes a 30-year recorded land use restrictive covenant for all projects receiving NHTF Funding.</p> <p>While KHC’s priority housing needs include affordable rental and homeowner housing, and tenant-based rental assistance as equal priorities, KHC has focused on rental projects that serve special needs and the elderly as well as those that preserve existing housing stock. NHTF funds will be allocated in conjunction with LIHTCs and Tax-Exempt Bonds.</p> <p>Projects funded under the NHTF will be those that receive LIHTCs and Tax-Exempt Bond financing, both of which are non-federal sources of funding, and leveraged funds will be the majority of funds in the total financing of these projects.</p> |
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| What are the outcome measures expected as a result of the method of distribution? | Outcome measures include availability/affordability/accessibility of decent affordable housing. |
|--|---|

Discussion:

Each program has a specific, individual method for distribution of funds. KHC and DLG periodically announce funding rounds via eGrams and on their websites.

AP-35 Projects – (Optional)

Introduction:

State participating jurisdictions do not identify specific projects that will be funded. Funded projects for HOPWA will be added after funding decisions are made. If HUD determines that additional programs meet this requirement, minor amendments to the Action Plan will be made to include other projects funded during the program year from the funds covered by this plan.

| # | Project Name |
|---|--------------|
| | |

Table 9 – Project Information

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

Allocation priorities are in part based on statewide demographic and economic data along with demand/needs identified in previous program years.

Priorities are also based on feedback from partners such as units of local government, nonprofit community development organizations, intermediaries and associations representing the housing and homelessness organizations and causes, and professional developers, property managers, and asset managers.

The primary obstacle to addressing underserved needs continues to be the need for more affordable housing funding. Increased and consistent funding would allow for the creation of more affordable housing units—both homeownership and rental. In addition, sustained higher funding levels would allow KHC and its partners to build the capacity of nonprofit or for profit affordable housing developer to serve more families and address underserved geographic parts of the state.

AP-38 Project Summary
Project Summary Information

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

Yes

Available Grant Amounts

The Section 108 Loan Guarantee Program will allow Kentucky to leverage up to five times its annual CDBG allocation for large-scale economic development and community projects. Considering current market conditions and to encourage development in Kentucky, the Commonwealth is now considering applications from non-entitlement communities that the Commonwealth may submit to HUD on behalf of these communities for the Section 108 Loan Guarantee program. Funds borrowed using Section 108 requires a pledge of the Commonwealth's current and future CDBG allocations. The Section 108 program provides an additional source of funds to address significant economic development and community projects which have a regional or statewide impact.

Acceptance process of applications

Applicants must submit an original and one (1) copy of a program specific project application. Activities described in the application are reviewed to determine if they meet the fundability criteria as established in the Housing and Community Development Act. Project activities must meet one of the three National Objectives as referenced in Section II.

CDBG program staff review applications and prepare a project summary/review. Staff submit their summary to a review committee designated by the Commissioner. The committee will meet and evaluate projects based on the review criteria and staff comments. The committee will determine approval, rejection, or deferral. In the event demand exceeds the amount of funds available, those projects with the greatest need and effectiveness are for funding.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State’s Process and Criteria for approving local government revitalization strategies

DLG does not have a designated *Revitalization Program*. DLG allows communities, within the regular guidelines, to choose a specific area of focus and carry out various kinds of eligible revitalization activities, over time. A city or county may include any eligible CDBG activity in a revitalization strategy. Most of the activities fall in the Community Projects or Housing program areas. This includes projects such as senior centers, health and wellness centers, housing rehabilitation, and slum and blight removal. A community can choose to Economic Development projects as well. Many projects include partnerships with funds from other sources and participation of non-project agencies. For additional information on the process and approval of CDBG revitalization projects, please go to the DLG web page at http://kydlgweb.ky.gov/FederalGrants/16_CDBG.cfm.

AP-50 Geographic Distribution – 91.320(f)

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

CDBG: All cities and counties in Kentucky are eligible for participation in the CDBG Program except for the cities of Ashland, Bowling Green, Covington, Elizabethtown, Henderson, Hopkinsville, Owensboro, the City of Lexington/Fayette County and City of Louisville/Jefferson County Metro Government, which receive a direct allocation of CDBG funds from the federal government.

HOME: Based upon demand for available funds, KHC will make every effort to ensure that the HOME funds are disbursed geographically. Reservations of HOME funds will be monitored throughout the year. If deemed appropriate, KHC may discontinue allowing applications from certain areas of the state if the area has already received greater funding as compared to other areas of the state. Such a hold on applications would only continue until KHC could ascertain the demand for funds in all areas of the state.

ESG: Kentucky's ESG funds will be made available to Balance of State Continuum of Care cities and counties or private, non-profit organizations through a competitive application process. KHC reserves the right to award any additional funding received in 2020 in the most judicious manner, which may or may not include a competitive application, depending on the level of funding available and CoC-established goals. Because funds requested are always more than what is available, KHC will continue the practice of only funding ESG applicants serving clients in non-entitlement ESG areas. It is KHC's intention to fund eligible applicants representing a broad geographic area in the state.

HOPWA: Eligible applicants are nonprofit agencies and local governments across the state. HOPWA funding application awards have been very consistent for several years with funding reaching the entire state. HOPWA-funded agencies cover large service areas, which allows for all counties within KHC's balance of state to be covered by HOPWA funding.

HTF: Eligible applicants are affordable multifamily housing entities applying for 4% LIHTCs in combination with HTF funding and tax-exempt bonds. KHC will make every effort to distribute HTF funds geographically. The ability to do so may be limited by the location of eligible applicants and projects that receive adequate scoring to be funded. While other block grant programs may be limited to non-

entitlement areas of the state, HTF funds will not be subject to this restriction.

All funds are allocated through competitive funding applications submitted for eligible activities.

CARES Act (CDBG-CV, ESG-CV, HOPWA-CV): CARES Act funds will be used across the state.

Geographic Distribution

| Target Area | Percentage of Funds |
|---------------------------------|----------------------------|
| Non-Entitlement Geographic Area | 95 |

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In general, investments are not allocated geographically. However, KHC will make every effort to distribute HTF funds geographically (by congressional district) dependent upon market need and eligible projects. Tax Exempt Bond projects must adhere to Kentucky Housing Corporation’s QAP, which includes a provision allowing KHC to allocate resources to achieve a mix of resource usage or geographical distribution of resources among Kentucky’s congressional districts. Funding allocation proposals are finalized through KHC’s credit committee review. One of the purposes of the QAP is to provide as many rental housing projects as possible while considering geographical need, size and cost per unit, long-term viability depending on the funds available, applications received, and their location. As part of the credit committee’s selection process, the location of all proposed projects is reviewed to determine if allocations are distributed across the state.

Discussion

Funds under HOME, ESG, and HOPWA are targeted to areas of the state that do not receive a direct allocation from HUD. HTF funds may be allocated to projects located anywhere in Kentucky, based on project ranking and limitations addressed in any NOFA issued. For this reason, the state estimates that 95% of funds will be allocated in the target area. Additional information on HTF funds is included in the HTF Allocation Plan included in this Action Plan.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

ESG shelter activities are included in the rental assistance goal.

| One Year Goals for the Number of Households to be Supported | |
|--|-------|
| Homeless | 3,400 |
| Non-Homeless | 400 |
| Special-Needs | 189 |
| Total | 3,989 |

Table 11 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|--|-------|
| Rental Assistance | 3,400 |
| The Production of New Units | 70 |
| Rehab of Existing Units | 64 |
| Acquisition of Existing Units | 0 |
| Total | 3,534 |

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion:

Homeless one-year goal includes those who received rapid-rehousing assistance. Non-homeless are those assisted with homeless prevention funds. Special needs goals include those receiving HOPWA rental and/or short-term rental/mortgage/utility assistance.

One-year goals also include:

- Rental assistance - HOME TBRA, HOPWA Rental Assistance, and ESG Rapid-Rehousing Assistance
- New Units - Homeownership and rental new construction units under HOME and HTF
- Rehab Units - HOME and CDBG homeowner rehab units and HOME and HTF rental rehab units.

Goals in both tables represent units completed during the year, rather than those awarded funding, in keeping with HUD's annual reporting requirements.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

Although public housing is primarily administered at the local and not the state level, there have been many efforts undertaken to encourage and assist the population served through public housing to obtain economic self-sufficiency.

The KHC Tenant Assistance Programs department administers the Housing Choice Voucher Program in areas of the state that are not served by a local public housing authority (PHA). For many years, KHC has been at maximum capacity under its voucher program the waiting list remains closed for the most part. KHC does periodically open its waiting list for short periods of time. KHC aggressively pursues any new voucher funding opportunities.

There are approximately 106 public housing agencies in Kentucky that manage conventional public housing units. PHAs play an important role in filling the gap between the need and supply of affordable rental housing. These agencies provide housing for over 23,000 families statewide.

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

The Family Self-Sufficiency (FSS) Program, administered by KHC, provides supportive services to participants who possess a housing choice voucher when they sign a five-year contract of participation. The goal of this program is to help participants become self-sufficient by obtaining employment and becoming free of government assistance, including public housing. FSS participants receive employment skills training, budget and credit counseling, money management tips and homeownership education. KHC also establishes a savings account with monthly deposits based on the participant's increased earnings. FSS graduates are encouraged to use the escrow funds as a down payment on a home, but this is not mandatory. Currently, 108 families are participating in FSS and 69 of these participants have funds in escrow.

Replacing the Yes You Can...Own A Home Program, the new Realizing the American Dream Program is sponsored by KHC and local lenders, also targets people currently living in rental or public housing who would like to own their own home. Classes are offered to participants to teach the basics of becoming a homeowner. Classes discuss the mortgage loan process, finding the right house, budget and credit, loan closing, foreclosure prevention, basic home maintenance and more. This program will continue into the next fiscal year and will attempt to further reduce the number of Kentuckians dependent upon public housing assistance to survive. The class is available in multiple languages.

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

Homeownership education programs allow families housed by local housing authorities the knowledge

and qualifications to access KHC's single-family loan programs.

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

In the event KHC is notified by HUD that a public housing agency in Kentucky is designated by HUD as "troubled", KHC will determine if it can provide financial and/or technical assistance to the public housing agency.

Discussion:

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The state uses a multi-pronged approach ensure that homelessness is rare, brief, and non-recurring. Kentucky Interagency Council on Homelessness (KICH) is the state policy advisory entity on homelessness. KICH is composed of representation from state government, nonprofit, and advocacy agencies for fostering cross-sector collaboration and to perform several functions:

- Serve as the single statewide homelessness planning and policy development resource for the Commonwealth of Kentucky.
- Review, recommend changes, and update Kentucky’s Ten-Year Plan to End Homelessness.
- Monitor and oversee implementation of Kentucky’s Ten-Year Plan to End Homelessness to ensure that accountability and results are consistent with the plan.
- Serve as a state clearinghouse for information on services and housing options for the homeless.
- Conduct other activities as appropriate.

Kentucky has three Continuum of Care geographic areas—Lexington, Louisville and the KY Balance of State (BoS) (remaining 118 counties). KHC, as the Collaborative Applicant for the CoC Program for Kentucky’s BoS CoC, awards sub-grants to homeless service providers throughout the BoS. Through the CoC program, the ESG program, and other related programs such as the VA’s SSVF program, persons experiencing homelessness or at-risk of homelessness can be served with supportive services, transitional housing, permanent supportive housing, rapid re-housing programs, and prevention, as appropriate. The KY BoS CoC is governed by an advisory board made up of representatives from the six regions within the KY BoS CoC as well as ex-officio members representing the Kentucky Coalition Against Domestic Violence (KCADV) and the Homeless and Housing Coalition of Kentucky (HHCK) and at-large members representing community organizations not funded through ESG or CoC. The Board works to improve collaboration, coordination, and system-wide performance in preventing and ending homelessness.

KHC’s CoC programs, including those funded through ESG, are for families and individuals who, in addition to safe, decent and affordable housing, need access to supportive services to stay housed permanently. Supportive housing combines permanent, affordable housing with flexible support services to help the tenants stay housed and build the skills to live as independently as possible. The ESG program is used in part to provide emergency services when people experience crises. Through the KY BoS CoC system, emergency shelters work with permanent housing providers to quickly move people out of shelters and into permanent housing. By using a common assessment tool, the CoC can determine which clients have the highest level of need so that the most intensive resource, PSH, can be reserved for those cases. Rapid rehousing is an effective intervention for people needing less supportive services.

The KY BoS CoC, in partnership with Kentucky’s other CoCs, are actively working towards meeting the

goals set forth in Home, Together: The Federal Strategic Plan to Prevent and End Homelessness. To meet these goals, the KY BoS CoC established the following objectives:

- Increase access to safe and affordable housing units for homeless families, individuals and youth.
- Increase funding for and access to comprehensive supportive services that help assure housing stability and encourage self-sufficiency.
- Increase funding for prevention services to reduce the numbers of persons falling into homelessness.
- Increase scope and quality of data collection through the statewide Homeless Management Information System to document both project and system performance and continuing need.
- Implement a client-centered Coordinated Entry System to move people with the highest needs into permanent housing as quickly as possible.

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

Because Kentucky is a primarily rural state, developing a single outreach plan to cover the full CoC geographic area is a challenge. Many of the common places for rural, unsheltered homeless are remote and difficult to identify. Through the outreach efforts of the point-in-time count volunteers, the CoC has been able to identify local people in each county most likely to know of rural homeless locations (i.e., police officers, mail carriers, school bus drivers, etc.). Additionally, working with the ESG recipients, KHC encourages inclusion of street outreach as an eligible use for the state ESG allocation. Training on the eligible uses of ESG street outreach funding was made available across the state. Furthermore, the KY BoS CoC is implementing a statewide Coordinated Entry System. Since the geographic area is so large, the CoC is implementing coordinated entry by using smaller regions, which mirror existing area development districts (ADDs). All areas are utilizing a common assessment tool and are following policies and procedures adopted by the CoC Advisory Board. Four KY BoS CoC member agencies have received CoC grants to support their work as Coordinated Entry leads in their regions. KHC has also allocated ESG funding to support Coordinated Entry lead agencies that have not received CoC funding using Program Year 2017 ESG supplemental award funding.

KHC will continue to work closely with KICH, CoC and ESG agencies, other state agencies, and other service providers to increase coordination of efforts to maximize limited resources focused on homeless

and special needs populations in the following areas:

- Supportive services including medical and mental health services
- Adequate discharge planning
- Homeless prevention funding
- Utilities assistance funding
- Connecting those in need of services to those who offer services.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the ESG funding application places a priority on Rapid Rehousing (RRH), programs serving both individuals and families with children, KHC is still allowing a large portion of the allocation to be requested and used in the Emergency Shelter Component. Since the BoS CoC is largely rural, there are very little, if any, resources available within communities to address the needs of people when they experience a crisis necessitating a temporary housing solution, which is why the ESG program is so critical to Kentucky's homeless response system. Through coordinated entry, emergency shelters are working closely with permanent housing providers to move people as quickly as possible out of the crisis response system and into permanent housing. The KY BoS has been aligning its funding priorities with those expressed by HUD in recent years. One area that HUD has emphasized is reallocating funding from transitional housing programs to permanent housing. After this most recent CoC competitive funding round, the KY BoS CoC has reduced its number of CoC transitional housing programs to just one out of more than 50 projects. Over the past several years, our traditional transitional housing programs reallocated their resources to either permanent supportive housing or rapid rehousing. The KY BoS CoC still values transitional housing as an option for clients, especially programs for youth, persons in recovery, or victims of domestic. There are other transitional housing options funded with resources besides CoC or ESG within the state that may be more appropriate for some people experiencing homelessness, such as substance use recovery programs or transitional housing programs for veterans.

In both the 2017 and 2018 CoC competitions, the KY BoS CoC was awarded funding for the new, Joint Component programs that combine Transitional Housing and Rapid Rehousing into the same project, the transitional housing will be used as crisis housing in areas that do not already have low-barrier, crisis housing (e.g., emergency shelter). The RRH portion of the program will help the CoC be able to move people quickly out of their "crisis" situation into permanent housing.

Both emergency shelter and transitional housing programs include some or all the activities below:

- Provision of essential services to homeless individuals and families. This includes services concerned with employment, health, drug abuse, education, transportation and staff salaries necessary to provide these services.
- Provision of rental assistance for homeless individuals and families.
- Working closely with the Cabinet for Health and Family Services to ensure persons in need of

services have access to them.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

By prioritizing ESG funds for use with RRH programs, working with the CoC to identify agencies to apply for CoC RRH and PHS projects, and finding other innovative ways to create supportive housing opportunities, resources are becoming better aligned with the need to reduce the time individuals and families remain homeless as well as giving them access to sustainable, permanent housing options. In addition, KHC strongly encourages emergency shelters to use funding available through ESG for essential services to provide case management to divert persons from scarce CoC and ESG RRH and PSH resources by helping them reconnect with their own support networks or by accessing other housing resources such as Housing Choice Vouchers. Kentucky has a variety of services and housing that assist homeless veterans. Through the Kentucky Interagency Council on Homelessness, it has been successful in identifying resources and gaps in veterans' assistance. In addition, service providers are being linked with organizations serving veterans, both private (local SSVF programs) and public (VA Service Centers). With several VASH programs and SSVF programs operating in Kentucky, the services to veterans have never been more accessible as they are now. Additionally, both the Balance of State CoC and the ESG applications provide scoring incentives for agencies targeting veterans as well as chronically homeless individuals or homeless families with children.

KHC has partnered with HUD to end veteran homelessness in Kentucky. KHC has dedicated housing assistance for 100 homeless Kentucky veterans to be available through the Veterans Emerging Towards Transition (VETT) Program, which was created in 2015. Through the VETT program, KHC will designate a preference for up to 100 Housing Choice Vouchers (HCV) for qualified homeless veterans in the 87 counties KHC serves under the HCV program. This special assistance will help qualified veterans pay for housing and ultimately reduce the number of homeless veterans in Kentucky. Unlike other VA-related programs, the VETT program can be accessed by veterans regardless of the length of service or the type of discharge status, which allows the state to reach a broader population of homeless veterans.

KHC, as the PHA for 87 Kentucky counties, has partnered with the KY BoS CoC to create the Kentucky Moving On program, an initiative designed to transition people who no longer need intensive services offered through a permanent supportive housing program (PSH) into an HCV within the community. CoC-funded PSH providers assess the housing readiness of existing PSH clients to identify those who have already achieved housing stability. The agencies then refer the clients to the Moving On program. In addition to helping people transition into independent, stable housing, the program allows PSH programs to use the resources that have been freed up to serve people with higher needs, especially

people experiencing chronic homelessness.

The KY BoS CoC was selected as one of ten communities nationwide out of 130 applicants to participate in the first round of HUD's Youth Homeless Demonstration Program (YHDP). HUD awarded \$1.9 million to create a coordinated community plan to prevent and end homelessness and fund demonstration projects serving youth in the eight-county Southeastern Kentucky Promise Zone. Funded activities include transitional crisis housing, rapid re-housing, and supportive services, including system navigation, with projects launched in late 2018. YHDP activities are guided by the Coordinated Community Plan to Prevent and End Youth Homelessness in the Southeastern Kentucky Promise Zone released on December 21, 2017.

The demonstration will provide important information about how to address the unique challenges of homeless youth through the state and nationally.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Under the Emergency Solutions Grant program, the state continues to allow funds to be allocated to Homelessness Prevention. These funds are usually in high demand from agencies.

The CoC collaborates with the Cabinet for Health and Family Services (CHFS), which implements discharge planning for youth who age out of foster care. Independent living coordinators and Cabinet social workers develop a transition plan help to identify appropriate, sustainable housing options prior to discharge from foster care, giving them access to stable housing through age 23. The program provides up to six months of initial rental assistance plus an additional six months if needed, through the Chafee Room & Board program. This program is expected to assist approximately 175 persons this year.

Discharge planning efforts from health-care facilities in Kentucky takes place according to the health-care venue and/or program. Kentucky participates in Medicaid and Medicare programs and is required to adhere to all applicable standards of care, including discharge. The Center for Medicaid and Medicare Services (CMS) Condition of Participation requires that hospitals must have in effect a discharge planning process that applies to all patients. The evaluation process includes determining an appropriate discharge site. A very small percentage of persons exiting health-care facilities are discharged to homeless programs. The State has established a policy to prevent individuals with serious mental illness from being discharged into homelessness. Instead, the policy requires discharge from inpatient psychiatric hospital settings and other facilities to permanent community-based housing. Facility staff collaborate with family members, guardians, service providers and others to ensure that discharge

planning begins upon admission, that the individual's preferences are honored through person-centered planning and that every effort be made for community integration in housing and services. The majority of persons discharged from state psychiatric hospitals return to their own homes. KHC partners with the state on two programs specifically targeting this population. KHC's Olmstead housing initiative is expected to assist nearly 150 persons this year through a combination of rental assistance vouchers, permanent supportive housing rental units, and the HUD Section 811 Program.

The Department of Corrections' discharge policy and procedures ensure every effort to secure safe housing for offenders prior to release from incarceration. The first option is to determine if the individual can return to his/her home; then to consider housing options with family or friends. Many offenders recognize that returning home may not allow them to be successful, and they choose to secure a home placement in a transitional living facility. The transitional housing may have specific requirements and seeks to assist the offender in his/her reentry process. Offenders typically return to home placements with family or friends. The Department of Corrections works directly with contracted halfway houses (re-entry centers) when a family member or friend is not available to support the offenders' transition into the community. The Recovery Kentucky program assists persons who have substance abuse dependencies. The recovery centers are funded by the Department of Local Government, Kentucky Housing Corporation, the Department of Corrections, and other community funds and are expected to assist more than 1,100 persons this year. Community Development Block Grant (CDBG) funds provides program services funding and KHC rental assistance funding supports 13 Recovery centers across the state.

Discussion

KHC will continue to provide technical assistance and training to HIV/AIDS housing and service providers to increase capacity. Also, HOPWA grantees are encouraged to participate in the COC system where they may be more successful in partnering services and housing with other providers who may serve the same or similar populations.

HTF funds may be awarded to projects serving special needs and/or homeless populations. Additional information about HTF is available in the allocation plan included in this Action Plan.

In April 2020, KHC and DLG were awarded additional funds (CDBG, ESG, HOPWA) in response to the COVID-19 pandemic. KHC plans to take the following actions to maximize the impact of CARES Act funds:

Emergency Solution Grant (ESG-CV)

- 1) Survey homeless services agencies to determine needs in response to COVID pandemic (currently underway).
- 2) Assess the needs and capacity of existing ESG grantees, non KHC-funded homeless shelters, providers, and social services providers with broad geographic reach (including but not limited to Community Action Agencies and/or Community Mental Health Centers) to determine the best way to award funds

to ensure citizen needs are met throughout the Commonwealth.

3) As appropriate:

- a. Amend grant agreements with existing subrecipients to award ESG-CV funds.
- c. Directly grant ESG-CV funds to agencies to ensure geographic coverage throughout the Balance of State and/or meet agency emergency needs.
- d. Administration of direct assistance by KHC staff, if permitted in forthcoming ESG -CV Guidance from HUD; and
- e. Utilize other methods of funding and grant administration as allowed by HUD Guidance and Waivers to be issued, as necessary.

Housing for Persons with AIDS (HOPWA-CV):

- 1) Allocate HOPWA-CV funding proportionally to existing formula subrecipients.
- 2) Confer with subrecipients individually to discuss limiting of CARES Act funding to STRMU and/or TBRA and assess subrecipient capacity to manage an expend additional funds.
- 3) Adjust allocations, if necessary, following meetings.
- 4) Amend existing grant agreements to award CARES Act HOPWA funds to subrecipients.
- 5) On an as-needed basis, allow subrecipients to allocate funding via budget modifications to the leasing line item to support short-term hotel/motel vouchers should clients need to isolate due to a COVID-19 infection

KHC's executive timeline for the actions above are:

ESG-CV: Funding allocations will be made within 15 days of KHC executing ESG-CV grant agreement with HUD. If applicable: grant amendments with existing subrecipients executed within 30 days of ESG-CV grant execution; NOFA issued within 30 days and funding awarded within 60 days of ESG-CV Act grant execution; and/or direct awards made within 90 days of ESG CARES Act grant execution. KHC may also directly administer assistance to households in need if permitted by HUD program guidance.

HOPWA-CV: Grant amendments with existing HOPWA formula subrecipients executed within 30 days of KHC executing HOPWA-CV grant agreement with HUD.

AP-70 HOPWA Goals – 91.320(k)(4)

| One year goals for the number of households to be provided housing through the use of HOPWA for: | |
|--|------------|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family | 128 |
| Tenant-based rental assistance | 48 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Total | 176 |

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

Many of the barriers to affordable housing in Kentucky are concentrated at the local level, rather than at the state level, as cities and counties establish regulations, plans, and policies that affect their jurisdictions. The overall demand for affordable housing and the lack of funding to fulfill the demand continues to be the biggest barrier statewide.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

On the state level, there are numerous examples of state agencies working in cooperation to reduce barriers to affordable housing:

- The Kentucky Infrastructure Authority has enacted a Water and Waste-Water Plan.
- The Recovery Kentucky program is an example of state agencies working together to remove barriers that unintentionally arise because of compartmentalization.
- The Governor’s Re-Entry Task Force has identified criminal backgrounds, especially sex offenses, as significant barriers to affordable housing and has solicited input from the Kentucky Interagency Council on Homelessness (KICH) and other stakeholders to develop a legislative agenda to address these barriers. Just recently the state legislature passed, and Governor Matt Bevin signed, legislation to assist those convicted of low-level felonies.
- The Kentucky Interagency Council on Homelessness (KICH) maintains four subcommittees that are also exploring regulatory barriers specifically affecting the homeless population. KICH identified lack of fair housing policies and limited or lack of affordable housing policies at the local government level as barriers. The need for additional access to permanent housing options is a pressing need.
- The Low-Income Housing Tax Credit allocations includes funding under multiple pools of monies, including HOME, tax credits, and Housing Trust Fund monies. Applications are ranked based on several factors including projects located in an area for which the local jurisdiction has a formally recognized or adopted plan for revitalization, community development and/or economic development.

Discussion:

KHC conducts an Analysis of Impediments to identify any barriers and access to affordable housing. Please refer to the AI Addendum attached to this Plan for more information on how KHC works to address and overcome these barriers.

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

KHC plans to address the following obstacles to meeting the housing needs of underserved populations:

There is only one affordable rental housing unit available for every three low-income households in need. Existing rental housing is being lost due to expiring contracts and affordability periods. KHC is undertaking a plan to preserve existing housing including offering financing programs to update and preserve properties and extend affordability periods, ensuring the housing remains available to low-income households. Part of KHC's efforts to meet this underserved need by increasing the supply of affordable rental housing for extremely low-income and very low-income households includes combining sources of funding (Housing Tax Credits, Tax-Exempt Bonds, Housing Trust Fund) to fund projects using a blend of financing mechanisms and block grant funds along with project-based rental assistance. This method of financing has allowed KHC to increase the number of housing units it can produce each year to meet this underserved need. Projects funded under the National Housing Trust Fund must be deed-restricted to remain affordable for 30 years – a period much longer than other sources of funding.

Youth aging out of foster care have a high risk of becoming homeless and need assistance transitioning from foster care to independent living. Obstacles facing this population include the lack of income to pay the costs associated with establishing an independent household, and short-term case management. Chafee Room and Board is administered by the state Cabinet for Health and Family Services and KHC. The program provides household setup funds and short-term rental assistance to assist this population in transitioning from foster care to independence. This program continues to assist this population. Homeless youth will also be assisted under a new CoC demonstration project funded recently.

Actions planned to foster and maintain affordable housing

Kentucky's block grant funds will be distributed throughout the state on a competitive basis for eligible activities through several methods described in the program guidelines for each program for the purposes of preserving existing affordable housing as well as fostering new affordable housing opportunities. Units of local government, nonprofit and for-profit entities will be able to apply for funding to carry out eligible activities. This distribution system allows eligible agencies to apply for funding for activities that will address the priority needs for their community. In addition, funds awarded to local communities will also address the housing needs outlined in the state's Consolidated Plan.

The Consolidated Plan addresses a variety of needs for affordable housing and community development that were derived from input at local levels across the state and utilizing housing data. The plan

represents a wide array of needs. While one community may need rental housing production at a specific site, another community may need homeowner rehabilitation over a scattered site. For the state to address its community needs, the block grant programs need a level of flexibility for eligible activities to be undertaken. The state will support any application for funding under both federal and private sources that will assist the state in meeting any category of need for affordable housing and community development. The Housing Policy Advisory Committee consists of 10 ex officio state government members, 17 at-large members appointed by the chairman of the Board of Directors of KHC, a member of the Senate and a member of the House of Representatives. The advisory committee submits an annual report of activities and recommendations to the governor. The Housing Policy Advisory Committee includes numerous subcommittees, including a data subcommittee. This subcommittee reviews needs data annually and makes recommendations to KHC on priorities, which are considered when drafting each annual action plan.

Actions planned to reduce lead-based paint hazards

Both KHC and DLG have a commitment to ensure that recipients of HOME, CDBG, ESG, HTF and HOPWA funds administer programs that adequately limit the risks associated with lead-based paint. Program administrators assist in statewide and local efforts to detect and abate lead-based paint as appropriate. Recipients of funding through these block grant programs are required to comply with all federal, state and local lead-based paint regulations. KHC and DLG staff members take several steps to fulfill their responsibility regarding lead-based paint hazards. Applicants for HOME, ESG, HTF and HOPWA funds are made aware of the requirements of the lead-based paint regulations as they apply for funds. If funded, applicants receive additional formal training and individual technical assistance provided by staff. This technical assistance is available through the life of the project.

Inquiries regarding lead-based paint hazards, evaluation and screening are often referred to the Environmental Lead Program administrator at the Kentucky Department of Public Health. To assist with the cost of lead-based paint removal activities, KHC allows HOME funds to be used in the form of a grant for homeowners receiving assistance for homeowner rehabilitation activities. KHC adopted an environmental assessment policy several years ago. During the next fiscal year, KHC anticipates a review of the current policy to determine whether it requires revision. The current policy requires a Phase I environmental assessment for many projects. Dependent upon the findings of a Phase I review, a Phase II review may be required. KHC staff members perform visual inspections to identify possible lead-based paint hazards for projects wishing to use block grant funds. Several inspections of projects involving rehabilitation are performed during the construction process. In addition, Housing Quality Standards (HQS) inspections are performed at rental properties throughout the state.

DLG has adopted a policy on lead hazard reduction in keeping with federal regulations. For projects involving a home constructed prior to 1978, grantees are notified of the hazards of lead-based paint. In addition, if housing built prior to 1978 is being rehabilitated, the housing must be inspected for

defective paint. If surfaces are found to be defective, they must be treated during rehabilitation.

Full abatement of lead-burdened housing is a worthwhile goal. However, it is costly, and caution must be taken to ensure that the work is performed in a safe manner by certified workers. Additional information about lead-based paint abatement is available through the Department of Public Health, the federal Environmental Protection Agency, KHC and DLG.

Actions planned to reduce the number of poverty-level families

KHC and DLG have been providing affordable housing and economic development opportunities to decrease the number of poverty-level families living in unsafe and unaffordable housing. KHC's programs range from homeless assistance and Section 8 rental assistance to homeownership and housing financing programs. DLG housing programs are typically, but not limited to, single-family housing rehabilitation. DLG offers many non-housing programs that focus on community and economic development to combat poverty.

Long-term anti-poverty CDBG objectives include:

- Encouraging private investment that will result in the creation of new jobs for the unemployed and underemployed.
- Discouraging the out-migration of businesses that employ and serve the local population.
- Fostering a revitalization of community structure to help communities help themselves.
- Enabling local communities to plan for future community development needs.

Housing – whether rental or ownership – is viewed as one of the major components in assisting individuals and families in overcoming the struggles of poverty. It takes a combination of many activities, such as job training and education, health and child care assistance as well as a place to call home to effectively assist families on the continuum towards self-sufficiency. A variety of affordable housing programs across the state not only provide direct financial assistance with housing costs, but combine housing assistance with social programs, such as life skills training, job training, post-secondary education, and homeownership counseling.

To meet the goal of raising the standard of living for all low-income individuals and families, the state is committed to assisting individuals in achieving employment; continuing adult education and postsecondary education; childhood development intervention; adequate and affordable child care for working families; increased access to health insurance coverage and the provision of affordable housing opportunities.

KHC will continue to fund the Scholar House program, designed to assist single parents in obtaining higher education. These programs have been established at several universities across the state and provide housing and childcare for single parents enrolled in college. After graduation, the family may

obtain housing using a rental voucher.

DLG will continue to fund traditional economic development activities that create or retain jobs principally benefiting low- and moderate-income persons. Nontraditional economic development projects are those which provide funding of activities including, but not limited to, job training and placement of other support services including peer support counseling, child care and transportation.

KHC will continue to participate in the newly-formed SOAR initiative, focused on assisting the Appalachian area of the state, where the highest levels of poverty have remained for decades.

(continued in discussion section below)

Actions planned to develop institutional structure

KHC and DLG will continue to partner with a diverse number of entities from private industry, non-profit organizations and public institutions in carrying out activities under the Consolidated Plan. DLG works directly with eligible units of local government in distributing CDBG funds. KHC is responsible for the administration of the HOME, ESG, HTF, and HOPWA Programs. Eligible applicants include, but are not limited to, units of local government, Community Housing Development Organizations (CHDOs), nonprofit housing organizations and for-profit developers. Direct technical assistance from program staff for the HOME, ESG, HTF and HOPWA Programs is provided on a statewide basis to all eligible applicants. After funding is awarded, implementation and administration training is available to all recipients. In addition to administering the federal block grant programs, KHC and DLG administer other programs that partner with units of local government, CHDOs, nonprofit housing organizations and for-profit developers.

Both KHC and DLG depend on the active participation of partners to accomplish the overall goals of these programs of providing affordable housing opportunities to lower-income families and individuals across Kentucky:

- KHC administers Housing Choice Voucher Program funds in counties where there is no local housing authority.
- KHC works directly with HUD in the administration of the Risk-Sharing Program to increase the number of safe, decent and affordable rental units throughout the state. When funding is available, KHC processes and underwrites the loan applications and, in the event of default, the mortgage insurance risk is shared between KHC and HUD.
- The Governor's Local Issues Conference is held annually and is attended by local officials from cities and counties throughout the Commonwealth.
- The annual Kentucky Affordable Housing Conference will be attended by representatives of various housing and related service organizations.
- KHC and DLG work with the Recovery Kentucky Task Force that advocates for substance abuse

recovery services through long –term supportive housing, recovery programs aimed at addressing homelessness and recovery from addiction within the commonwealth.

- KHC coordinates the state’s Housing Policy Advisory Committee and participates on the Kentucky Interagency Council on Homelessness.
- KHC works with nonprofit organizations across the state through the various programs offered at KHC.
- Many private housing developers utilize the Housing Credit Program and HTF program as well as other federal and state housing programs for the development of affordable rental housing across the state. Likewise, KHC continues to maintain relationships with several private developers who utilize HOME funds to provide homeownership opportunities for low-income Kentuckians.
- KHC works with over 120 private lending institutions in the origination and processing of KHC mortgages. The statewide lender network enables lower income families the opportunities to access KHC’s loan products.

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

The Kentucky Interagency Council on Homelessness (KICH) is composed of representation from state government, nonprofit and advocacy agencies to collaborate on homeless issues. KICH Executive Committee consists of the CEO of Kentucky Housing Corporation, Secretary of Health and Family Services Cabinet, Secretary of Justice and Public Safety Cabinet, Secretary of Education Cabinet, Secretary of Transportation Cabinet, Executive Director of Administrative Office of the Courts, State Budget Director, Commissioner of Veterans Affairs, Executive Director of the Homeless and Housing Coalition of Kentucky and one member from each house of the Kentucky General Assembly appointed by the Governor.

The KICH Steering Committee consists of representatives of the Executive Committee, state government agencies, homeless advocates and service providers. The KICH Steering Committee has five policy subcommittees that mirror the core concerns identified in the Ten-Year Plan to End Homelessness. The policy subcommittees are: supportive housing, services/prevention, public will, and data.

The Kentucky Commission on Community Volunteerism and Service is a statewide, bi-partisan group comprised of at least 15 members, appointed by the governor, with diverse service and volunteerism backgrounds. The KCCVS actively engages citizens in community service opportunities that enable volunteers, organizations and businesses to share ideas and effectively collaborate to address Kentucky’s needs. The KCCVS funding is provided by the Corporation for National and Community Service and the Kentucky General Assembly. The Governor’s Reentry Task Force – Statewide Reentry Steering Team was established to develop policy recommendations regarding the reduction of recidivism, enhancement of public safety and the furtherance of reentry efforts. The mission of Kentucky’s Reentry initiative is to integrate successful offender reentry principles and practices in the

Commonwealth of Kentucky state agencies and communities resulting in partnerships that improve public safety, enhance offender self-sufficiency, and reduce recidivism. The Kentucky Statewide Reentry Steering Team is developed to create a multidisciplinary work team to develop recommendations and provide information to the Governor's Reentry Task Force.

KHC and the state's Department of Mental Health/Mental Retardation coordinates funding focused on the needs of that portion of the Olmstead population with severe and persistent mental illness. These funds are used to move individuals from psychiatric hospitals and nursing facilities to apartments in the communities of their choice and for the construction of permanent supportive housing as funds become available.

The Recovery Kentucky Task Force provides oversight and direction for a network of 100-bed Recovery Kentucky Centers - drug and alcohol-free housing for persons who are homeless or at risk for homelessness due to their continued dependence on alcohol and drugs. These housing centers provide a safe and secure environment for men and women to begin a process of "self-help" and "peer-led" education that leads to long term sobriety. The Recovery Kentucky program model is designed to help the recovering alcoholic/addict regain a life of sobriety and to begin a journey toward permanent housing and self-sufficiency.

The FSS Provider Coordinating Committee (PCC) is established to assist KHC with planning and implementing the FSS Program. Members are representatives from state, local and private groups who have resources to assist low-income families and have a commitment to family self-sufficiency.

Discussion:

Continued from above:

Recipients of federal funds from DLG and KHC are required to adhere to federal Section 3 regulations that provide economic opportunity to low-income residents of the neighborhoods affected by the project and businesses owned by persons of low income.

KHC's multifamily production programs include incentives to de-concentrate poverty for new construction projects. The state's Analysis of Impediments to Fair Housing discusses de-concentrating poverty as well. KHC's housing choice voucher program is adapting materials in the briefing process to educate families about seeking housing that is not in a racial or ethnic area of concentrated poverty or concentrated area of housing vouchers.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The CDBG Program Income funds (\$883,337) listed in AP-15 Expected Resources are in Revolving Loan Fund (RLF) accounts. Most are designated for Economic Development projects and a few are Housing RLF funds. At this time, the funds are not yet included in any approved projects “to be carried out”. If a city or county with RFL funds submits a 2019 application for an ED or Housing project, the RLF funds must be included in the application and expended prior to drawing down any 2019 CDBG funds.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

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

| | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 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

| | |
|---|--------|
| 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. | 88.00% |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

| | |
|---|-----|
| 1. A description of other forms of investment being used beyond those identified in Section 92.205 is | |
| Annual Action Plan | 107 |
| 2019 | |

as follows:

KHC will invest HOME funds as interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies, deferred payment loans, forgivable loans, and grants. Assistance may be provided to private developers, nonprofit organizations, CHDOs, and governmental agencies.

An applicant that proposes to use any other form of investment not described in 25 CFR 92.205 must provide the following when applying:

- A description of the form of investment;
- Justification for the need for the form of investment; and
- A description of the proposed means of securing the investment, if any. KHC will not permit other forms of investment without prior HUD approval.

Additionally, the only preferences applied to HOME funding are as follows:

- **For homebuyer activities:** Households earning at/below 80% AMI and with non-home assets below \$50,000.
- **For rental activities:** Households earning at/below 60% AMI and, when HOME is allocated along with Tax-Exempt Bond financing, projects that will preserve rent-restricted and/or rent-assisted multifamily properties.

In NOFAs for individual formula allocation programs, KHC delineates in detail the eligible applicants and beneficiaries of each program. KHC also identify funding priorities in individual program NOFAs as well as in the LIHTC Qualified Allocation Plan.

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

See the HOME Recapture Provisions attached to this Action Plan.

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

All HOME funds used for homeownership activities will be required, at a minimum, to meet the HOME affordability period as established in 24 CFR Part 92.254. Additional guidance on maximum subsidy cap and affordability periods will be detailed in the Homeownership Application Guidelines and Scoring Criteria. Additional information is included in the HOME Recapture Provisions attached

to this Action Plan.

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

KHC will not allow HOME funds to be used in the refinancing of existing debt secured by multifamily housing.

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

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

ESG Written Standards are attached to this plan.

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

The Kentucky Balance of State CoC has fully implemented its coordinated entry system (CES) in accordance with the minimum requirements. The CoC began implementation of its CES in July 2015, with the establishment of a pilot project in a 16-county area of the 118 county BoS. With the lessons learned from that pilot, coordinated entry has been implemented across the entire geographic area governed by CoC-implemented policies and procedures. Since the geographic area is so large, the CoC is implementing coordinated entry by using smaller regions, which mirror existing area development districts (ADDs). All areas are utilizing a common assessment tool and are following policies and procedures adopted by the CoC Advisory Board. The CoC has elected to utilize the VI-SPDAT as its common assessment tool. All ESG and CoC funded agencies are required to utilize the VI-SPDAT and to work with other housing and service providers in their local prioritization areas to enroll participants in permanent housing based on the participant's level of need. The KY BoS CoC was awarded a CoC Supportive Services Only (SSO) grant to support coordinated entry. Four KY BoS CoC member agencies have received CoC grants to support their work as Coordinated Entry leads in their regions KHC has also allocated ESG funding to support Coordinated Entry lead agencies that have not received CoC funding using Program Year 2017 ESG supplemental award funding. The KY BoS CoC Advisory Board has established a coordinated entry committee, which is charged with overseeing the implementation of coordinated entry. The committee has worked closely with the Kentucky Coalition Against Domestic Violence to develop a process for victims of domestic violence to have access to the coordinated entry system without compromising potential privacy concerns.

3. Identify the process for making sub-awards and describe how the ESG allocation available to

private nonprofit organizations (including community and faith-based organizations).

KHC will make ESG funds available to eligible non-profits (including community and faith-based organizations) and local governments from the 118 counties in Kentucky that do not receive ESG allocations from HUD as entitlement areas.

In 2019, KHC will use a two-year competitive funding process whereby applicants awarded ESG formula funding in 2019 will be eligible for renewal in 2020.

In 2019, applications will be ranked based on score and allocations will be made based on applicant ranking, overall request, and expenditure rates from the 2017 and 2018 allocations.

2019 applicants will be evaluated on such areas as: local needs, applicant experience/capacity/performance, project design, community coordination, and other factors. Applicants were and will continue to be required to also address Impediments to Fair Housing.

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

KHC can meet this requirement, as KHC's subrecipients are required to include at least one homeless or formerly homeless individual on their Board of Directors, or as a participant on an advisory board that reports directly to the subrecipient agency's Board of Directors.

5. Describe performance standards for evaluating ESG.

KHC has implemented ESG Performance Standards for all subrecipient agencies.

Performance Standards for all subrecipient agencies. The primary outcomes KHC will monitor will be those established by HUD as part of the CoC System Performance

Measures that are relevant to ESG programs, which includes:

- Reduction in the average and median length of time persons remain homeless;
- Reduction in the percent of persons who return to homelessness;
- Reduction in the number of persons who are homeless;
- Number of persons who become homeless for the first time;
- Successful placement from Street Outreach; and
- Successful placement in or retention of Permanent Housing

KHC will also focus on outcomes established in Home Together: The Federal Strategic Plan to

Prevent and End Homelessness, which calls for coordinated efforts to end homelessness for veterans, youth, families, and chronically homeless in addition to persons experiencing homelessness overall.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible recipients will be multifamily housing developers who meet KHC's capacity review and criteria for successful applications for funding for new construction or rehabilitation of affordable multifamily projects in Kentucky. Capacity is based on experience and capacity, compliance monitoring history, financial management, additional criteria related to the status of projects in process, uncorrected compliance findings or concerns (if any), success of current projects/properties, and credit rating of members of the development team.

To create consistency throughout the Corporation, KHC utilizes a Capacity Scorecard for all program areas that have a competitive application or formula grant allocation process. The scorecard determines the overall capacity of the Entity or Development Team member(s) that will administer the proposed project and/or program they are applying for. The scorecard is divided in to three sections: Capacity Scorecard Threshold Requirements, Capacity Scorecard Self-Certifications, and Capacity Scorecard Overall Performance.

An example of the 2018 capacity scorecard is attached. The Capacity Scorecard Overall Performance section is where KHC staff will indicate if a capacity deduction will be applied. Guidance on the type of infractions that KHC will consider for possible capacity deductions are listed in this section of the scorecard. The list is not all inclusive, but guidance as to what criteria is used to determine a potential capacity deduction. A capacity deduction can be determined at any time throughout the administration of a project/program, through the affordability/compliance period. The capacity deduction can apply to the Entity or any member of the Development Team.

Application submissions will be in response to the 2018 Gap Financing and Tax-Exempt Bond Notice of Funding Availability and 2019 Low Income Housing Tax Credit (LIHTC) Notice of Funding Availability (and any successor notice if NHTF funds remain unallocated). Notification that applications are being accepted will be made via KHC's eGram service.

KHC supports development teams that have successfully undertaken multifamily development or preservation projects for affordable housing utilizing LIHTC or tax-exempt bonds during the preceding five years. The development team information will be reviewed to ensure that it has the capacity and financial strength to develop, construct and manage a LIHTC or Tax-Exempt Bond project. KHC's credit committee will discuss and prioritize each response according to the final score and available credit/bond cap.

Projects will also be evaluated on:

Project Characteristics, with points awarded for projects that preserve three or more existing affordable multifamily housing properties (portfolio projects); projects serving elderly populations, projects serving youth. Project age and occupancy rate will also be eligible for points. Points will be awarded to projects that have project-based Section 8 or other rental subsidy for at least 75% of units across the collective project. Points will be awarded to respondents assisting the greatest number of units.

Financial Characteristics, with points awarded to projects with commitments of gap funding sources outside KHC funding.

Market Absorption Requirements, KHC may require a project to recognize other funded projects in its market study review. In the event two or more projects are submitted from the same geographical region, KHC staff will determine, through market study reviews, that the targeted market for that region will be able to absorb each project. If the market review shows the target region cannot absorb multiple projects, then the highest scoring project will be approved. Market study considerations may cause a property/project to be denied funding or have funding reduced during the application and technical submission phase.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

KHC will focus on projects with some form of project-based rental assistance. Projects that have the highest scores based on the scoring criteria established for the 2019 LIHTC Funding Round will be considered for funding.

Respondents must meet the requirements of the 2019-2020 Qualified Allocation Plan (QAP) located at: [http://www.kyhousing.org/Development/Multifamily/Documents/2019-2020%20Qualified%20Allocation%20Plan%20\(QAP\)%20-%20DRAFT.pdf](http://www.kyhousing.org/Development/Multifamily/Documents/2019-2020%20Qualified%20Allocation%20Plan%20(QAP)%20-%20DRAFT.pdf)

Projects utilizing tax-exempt bond financing must engage an attorney or attorneys who: have acted as bond counsel or counsel for the bond trustee, bond purchaser, or the borrower in connection with at least one KHC multifamily bond issue within the previous five years; or can demonstrate a comprehensive understanding of KHC's general bond policies and procedures. Also, bond funds will only be available to projects that have not yet received or applied for an allocation of Tax-Exempt Bonds.

Projects must be completed and placed in service no later than 36 months after the date of the closing of all KHC funds.

Respondents proposing projects in Jefferson or Fayette counties (regardless of whether the respondents are seeking gap subsidy from Louisville Metro or LFUCG) must share their project concept with Louisville Metro and/or LFUCG and must secure a letter of interest from Louisville Metro or LFUCG. The letter of interest should express the municipality's support of a NOFA response but need not express any firm commitment of funds.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Application submissions will be in response to the 2019 Low Income Housing Tax Credit (LIHTC) Funding Round or through a Tax-Exempt Bond Notification of Funding. Notification that applications are being accepted will be made via KHC's eGram service. The LIHTC application is competitive. In addition to the housing credits allocated, successful applicants may be funded from other available sources for multifamily housing, including HOME and state Affordable Housing Trust Fund.

Applications will be reviewed and selected in a multi-tier process. The required documentation received with each NOFA response will be reviewed and evaluated for completeness, accuracy and detail. The development team information received will be reviewed to ensure the development team has the capacity and financial strength to develop, construct and manage an LIHTC or tax-exempt bond project. After all NOFA responses have been reviewed, KHC's credit committee will meet to discuss and prioritize each response according to the number of funding preferences the proposed project will meet. Projects which will address the majority of the preferences will be invited to submit a full application until all

available KHC funds have been allocated.

All projects must clearly address one or more impediments to fair housing. Respondents must identify fair housing impediments in KHC's Analysis of Impediments to Fair Housing (AI). If the project is in a HOME participating jurisdiction, the project must also address one or more impediments in the local jurisdiction's AI.

Project Characteristics -

Project Characteristics, with points awarded for projects that preserve three or more existing affordable multifamily housing properties (portfolio projects); projects serving elderly populations, projects serving youth. Project age and occupancy rate will also be eligible for points. Points will be awarded to projects that have project-based Section 8 or other rental subsidy for at least 75% of units across the collective project. Points will be awarded to respondents assisting the greatest number of units.

Market Absorption and Market Capture Requirements - all projects, define and justify the absorption period, absorption rate and capture rate for the property noting when the project is expected to achieve 93 percent occupancy. Capture rates and absorption rates are required to recognize other funded projects in its market study review. In the event two or more projects are submitted from the same geographical region, KHC staff will determine, through market study reviews, that the targeted market for that region will be able to absorb each project, noting the impact that capture rates and market absorption will have on existing and proposed projects in the area also funded by KHC. Market study considerations may cause a property or a project to be denied funding or have funding reduced during the application and technical submission phase.

Additionally, KHC will focus on projects that meet the following (in no order):

- Project Age and financial characteristics
- Average Occupancy Rate
- Projects with rental assistance
- Projects with funding from outside sources
- Access to schools, health care, and employment opportunities
- Projects serving seniors or youth

To see a full breakdown of applicant scoring please see the 2019-2020 QAP located at:

[http://www.kyhousing.org/Development/Multifamily/Documents/2019-2020%20Qualified%20Allocation%20Plan%20\(QAP\)%20-%20DRAFT.pdf](http://www.kyhousing.org/Development/Multifamily/Documents/2019-2020%20Qualified%20Allocation%20Plan%20(QAP)%20-%20DRAFT.pdf).

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

KHC will make every effort to distribute HTF funds geographically. The ability to do so may be limited by the location of eligible applicants and projects that receive adequate scoring to be funded. KHC's credit committee reviews final scoring and awards to ensure geographic diversity.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Projects must be completed and placed in service no later than 36 months after the date of the closing of all KHC funds. Recipients must present a project timeline demonstrating the ability to close on all funds requested, including any bond transaction within the specified timeframe.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

KHC's national HTF program includes a requirement that assisted units also include rental subsidy. The exception may be if funds remain unallocated after the issuance of a NOFA for national HTF funds. A second funding round to allocate remaining funds may not include this provision.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

KHC's national HTF program includes a requirement that assisted units also include rental subsidy. The exception may be if funds remain unallocated after the issuance of a NOFA for national HTF funds. A second funding round to allocate remaining funds may not include this provision.

KHC's program includes a 30-year recorded land use restrictive covenant for all projects receiving

national HTF Funding.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

HTF funds will be made available with the 2019 Low Income Housing Tax Credit (LIHTC) Funding Round. In accordance with the 2019-2020 QAP, LIHTC applications will be scored based on meeting certain priority housing needs.

KHC will focus on projects that meet the following criteria (in no order):

- Project Age and financial characteristics
- Average Occupancy Rate
- Projects with rental assistance
- Projects with funding from outside sources
- Access to schools, health care, and employment opportunities
- Projects serving seniors or youth

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

HTF funds will be made available with the 2020 Low Income Housing Tax Credit (LIHTC) Funding Round. In accordance with the 2019-2020 QAP, LIHTC applications that apply in the new supply will score additional points if they have direct contributions from businesses or non-governmental entities.

Contributions can be donated cash or materials only and must be included in the underwriting model. Contributions must be valued at \geq \$10,000 for rural projects and \geq \$20,000 for urban projects and come from a non-affiliated organization/company. All contributions must be evidenced by a letter from the donating entity stating the type and value of the contribution. The spirit of this scoring item is to incentivize investment by the local business community.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Pursuant to HUD Notice 15-003, Interim Policy on Maximum Per-Unit Subsidy Limits for the HOME Program, KHC has elected to utilize the per-unit limits provided by the Louisville HUD Field Office on June 4, 2018 (included in the HTF Allocation Plan attached to this Action Plan) that establishes the following per unit maximum:

- 0 Bedroom - \$147,074
- 1 Bedroom - \$168,600
- 2 Bedroom - \$205,018
- 3 Bedroom – \$265,229
- 4+ Bedroom – \$291,137

There is no maximum award amount associated with this program.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee’s description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

See attached Minimum Design Standards for New Construction, Adaptive Reuse, and Rehabilitation for Multifamily Attached Housing Units and Health and Safety Standards Chart.

The State's rehabilitation standards apply to all projects that will receive HTF funds.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A

Discussion:

AP-90: Program-Specific Requirements – HOPWA §91.320 (k)(4)

HOPWA Specific: Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)? **YES**

HOUSING TRUST FUND ADDITIONAL INFORMATION:

Pursuant to HUD Notice 15-003, Interim Policy on Maximum Per-Unit Subsidy Limits for the HOME Program, KHC has elected to utilize the per-unit limits provided by the Louisville HUD Field Office on

June 4, 2018 (included in the HTF Allocation Plan attached to this Action Plan) that establishes the following per unit maximum:

- 0 Bedroom - \$147,074
- 1 Bedroom - \$168,600
- 2 Bedroom - \$205,018
- 3 Bedroom – \$265,229
- 4+ Bedroom – \$291,137

There is no maximum award amount associated with this program.

Additionally, information regarding the following can be found on the specified pages of the 2019-2020 Multifamily Guidelines attached to this Action Plan:

- Lead-Based Paint – pages 36, 48, 50
- Accessibility – page 108
- Disaster Mitigation – state building codes address earthquake resistant construction in higher risk zones; pages 25 and 35 of Multifamily Guidelines address flood plain
- State and local Codes, Ordinances, and Zoning Requirements – Minimum Design requires compliance with State and Local codes. Page 108 of Multifamily Guidelines addresses building codes; zoning is addressed on pages 25, 34, and 38
- Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing – page 96
- Capital Needs Assessment – pages 25, 38, 90, 91, and 108 of Multifamily Guidelines address PCNA assessments and reserve accounts

Attachments

Citizen Participation Comments



HUD CPD Waiver Request
In response to the COVID-19 emergency
April 3, 2020

1231 Louisville Road • Frankfort, Kentucky 40601-6191 • 800-633-8896 • 502-564-7630 • TTY 711 • Fax 502-564-5708 • www.kyhousing.org

Requestor's name, title, and contact information:

Wendy K. Smith, Deputy Executive Director, Housing Programs
 Kentucky Housing Corporation (KHC)
wsmith@kyhousing.org, mobile: 270-402-1478 *WKS*

Declared-disaster area(s) where the waivers will be used:

The entire Commonwealth of Kentucky
 118 counties encompassing the Kentucky Balance of State Continuum of Care

Date grantee anticipates first use of the waiver flexibility: April 6, 2020

Waiver flexibilities Kentucky Housing Corporation will use

As the grantee for ESG, HOPWA, and 33 CoC grants, KHC plans to utilize the following waiver flexibilities as allowed by the Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19 memorandum issued by Assistant Secretary John Gibbs on March 31, 2020.

| | |
|---|--|
| X | 1. CoC Program - Fair Market Rent for Individual Units and Leasing Costs |
| X | 2. CoC Program - Disability Documentation for Permanent Supportive Housing (PSH) |
| X | 3. CoC Program – Limit on Eligible Housing Search and Counseling Services |
| X | 4. CoC Program - Permanent Housing-Rapid Re-housing Monthly Case Management |
| X | 5. CoC Program - Housing Quality Standards (HQS) – Initial Physical Inspection of Unit |
| X | 6. CoC Program - HQS – Re-Inspection of Units |
| X | 7. CoC Program – One-Year Lease Requirement |
| X | 8. Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Public Comment Period for Consolidated Plan Amendment |
| X | 9. Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Reasonable Notice and Opportunity to Comment |
| | 10. ESG Program – HMIS Lead Activities |
| X | 11. ESG Program - Re-evaluations for Homelessness Prevention Assistance |
| X | 12. ESG Program - Housing Stability Case Management |
| X | 13. ESG Program - Restriction of Rental Assistance to Units with Rent at or Below FMR |
| X | 14. HOPWA Program – Self-Certification of Income and Credible Information on HIV Status |
| X | 15. HOPWA Program – FMR Rent Standard |
| X | 16. HOPWA Program – Property Standards for TBRA |
| X | 17. HOPWA Program - Space and Security |



1231 Louisville Road • Frankfort, Kentucky 40601-6191 • 800-633-8896 • 502-564-7630 • TTY 711 • Fax 502-564-5708 • www.kyhousing.org

To: Renee Ryles, CPD Division
Louisville HUD Field Office

From: Wendy K. Smith, Deputy Executive Director, Housing Programs
Kentucky Housing Corporation (KHC), (Kentucky's non entitlement PJ)
wsmith@kyhousing.org
mobile: 270-402-1478

Background on HOME Waivers Related to COVID-19

As the participating jurisdiction for Kentucky's non-entitlement HOME Investment Partnership Program, KHC plans to utilize a number of waiver flexibilities as allowed by the following memoranda issued by Assistant Secretary John Gibbs on April 10, 2020:

1. [Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID-19 Pandemic.](#)
2. [Suspensions and Waivers to Facilitate Use of HOME-Assisted TBRA for Emergency and Short-term Assistance in Response to COVID-19 Pandemic.](#)

Per these memoranda, "A PJ that intends to implement the HOME statutory suspensions and/or regulatory waivers...must send written notification via e-mail to the CPD Division in its local HUD Field Office before it implements the waiver or suspension. This written notification must identify which suspensions and/or waivers the PJ plans to use."

This memo serves as KHC's notice to the Louisville HUD Field Office of the waivers KHC anticipates utilizing.

HOME Program Waivers & Suspensions KHC Plans to Utilize in response to COVID-19
Available to PJs in National Declared Disaster Areas

| | |
|-----------|---|
| X | 1. 10% Administration & Planning Cap PJ may expend up to 25% FY 2019 & FY 2020 HOME allocations and program income received for administrative and planning costs. |
| <i>No</i> | 2. Suspension of CHDO Set-Aside Requirement |
| X | 3. CHDO Operating Assistance A PJ may provide up to 10% of FY 2019 & FY 2020 HOME allocations as CHDO operating assistance, even if the amount exceeds the higher of \$50,000 or 50% of a CHDO's annual operating budget. PJs are not required to include a written agreement provision that the CHDO is expected to receive Set-Aside funds within 24 months of receiving the additional operating assistance. CHDOs may receive increased operating assistance through June 30, 2021. |
| <i>No</i> | 4. Match Requirement |



HOME Program Waivers & Suspensions KHC Plans to Utilize in response to COVID-19

Available to all PJs

| | |
|----------|---|
| X | <p>1. Citizen Participation Reasonable Notice and Opportunity to Comment PJs amending plans as a result of the COVID-19 may reduce the comment period to 5 days for any necessary substantial amendments to FY 2020 and earlier ConPlans or action plans.</p> |
| X | <p>2. Income Documentation Permits PJs to use self-certification of income, as provided at §92.203(a)(1)(ii), in lieu of source documentation to determine eligibility of persons requiring emergency assistance related to COVID-19. The waiver applies to households that have lost employment/income permanently or temporarily due to the COVID-19 pandemic and are applying for admission to a HOME rental unit or a HOME TBRA. PJs must arrange to conduct on-site rent and income reviews within 90 days after the waiver period. The PJ must include tenant income certifications in each project file. This waiver remains in effect through December 31, 2020.</p> |
| X | <p>3. On-Site Inspections of HOME-assisted Rental Housing This waiver extends the timeframe for PJs to perform ongoing periodic inspections and on-site reviews to determine a HOME rental project's compliance with property standards and rent and income requirements. The waiver is applicable to ongoing periodic inspections (does not waive the requirement to perform initial inspections of rental properties upon completion of construction/rehab). The waiver is in effect through December 31, 2020. Within 120 days of the end of waiver period, PJs must physically inspect units that would have been subject to ongoing inspections during the waiver period.</p> |
| X | <p>4. Annual Inspection of Occupied HOME TBRA Units Delays annual HQS inspections required to occur from April 10, 2020 through December 31, 2020. Within 120 days of the end of waiver period, PJs must inspect units that would have been subject to HQS inspections during the waiver period. PJs shall make reasonable efforts to address any tenant-reported health and safety issues during the waiver period.</p> |
| X | <p>5. Four-Year Project Completion Requirement Permits a PJ to request an extension of the deadline for up to one-year. This waiver applies to projects for which the 4-year project completion deadline will occur on or after April 10, 2020. The completion deadlines for covered projects are extended to December 31, 2020.</p> |
| X | <p>6. Nine-Month Deadline for Sale of Homebuyer Units This waiver applies to projects for which the 9-month homebuyer sale deadline occurs on or after April 10, 2020 and extends the deadline for those projects to December 31, 2020. This waiver does not apply to the remaining requirements of the regulation, including that a homebuyer must receive housing counseling, and that a PJ must determine eligibility of a family by including the income of all persons living in the housing.</p> |
| X | <p>7. Use of HOME Funds for Operating Reserves for Troubled HOME Projects The waiver applies to HOME-assisted rental projects currently within the period of affordability established in the HOME written agreement. PJs will not be required to obtain HUD approval or execute a memorandum of agreement with HUD before providing this assistance. PJs may only exercise this waiver authority when the project owner agrees to forego residual receipts, rights to pursue legal action against tenants for non-payment of rent/late fees, and adverse credit reporting against tenants of HOME assisted units, as further detailed the HUD memorandum. This waiver is effective through December 31, 2020.</p> |

Waivers KHC Plans to Utilize to Facilitate use of HOME TBRA in response to COVID-19

Available to PJs in National Declared Disaster Areas

| | |
|----------|---|
| X | <p>1. Consolidated Plan – HOME Certification, Analysis of Local Market Conditions, and Citizen Participation This suspension eliminates: 1) requirement for PJs to amend their ConPlans to include/revise an analysis market conditions before implementing a TBRA program; and 2) the requirement that PJs certify that the use of HOME for TBRA is an essential element of the ConPlan. PJs may simply amend their Annual Action Plan to reflect the use of HOME for TBRA. This waiver is applicable to a PJ's current 5-year ConPlan and any ConPlans/Action Plans being amended to reprogram funds to TBRA to address housing needs related to the COVID-19 pandemic.</p> |
| X | <p>2. Tenant Selection and Targeted Assistance Eliminates the need for PJs to develop/revise written tenant selection criteria and allows PJs to assist individuals requiring immediate housing assistance as a result of COVID-19. In effect through December 31, 2020, for TBRA provided in response to the COVID-19. However, a PJ must document its criteria for selecting individuals and families to be assisted by the TBRA program.</p> |

Waivers KHC Plans to Utilize to Facilitate use of HOME TBRA in response to COVID-19

Available to all PJs

| | |
|----------|---|
| X | <p>1. Citizen Participation Reasonable Notice and Opportunity to Comment Permits PJs amending their plans as a result of the COVID-19 pandemic to reduce the comment period to 5 days. This waiver applies to any approved Annual Action Plan being amended to reprogram funds to TBRA to address housing needs related to the COVID-19 pandemic.</p> |
| X | <p>2. Rent Reasonableness Permits PJs to provide immediate rental assistance to individuals and families seeking housing and assist individuals and families that have housing but are experiencing reduced or lost wages, without requiring an assessment of rents charged for comparable unassisted rental units. Applicable to TBRA provided to households experiencing financial hardship because of a reduction or loss of income. Applicable through December 31, 2020, for TBRA provided in response to the COVID-19 pandemic. PJs using this waiver authority must execute a rental assistance contract with the owner or tenant.</p> |
| X | <p>3. Eligible Tenant-based Rental Assistance Costs & Maximum TBRA Subsidy This waiver will allow PJs to pay the full cost of monthly utilities in addition to rental assistance and security deposit payments for new and existing TBRA families affected by the COVID-19 pandemic. PJs may provide up to 100% subsidy for rent, security deposit payments, and utility bills paid by tenants affected by a reduction or loss of income from the COVID-19 pandemic. The waiver also eliminates the need for the PJ to establish utility allowances for different types and sizes of units for its TBRA program, which eliminates a significant administrative burden. This requirement is waived through December 31, 2020, for rental assistance provided in response to the COVID-19 pandemic. PJs using this waiver authority must execute a rental assistance contract with the owner or tenant for a term mutually agreed upon by all parties, but not to exceed the December 31, 2020, waiver period. The PJ may make utility payments directly to the tenant or utility company based on utility bills submitted for the assisted unit.</p> |

| | |
|----------|---|
| X | <p>4. Term of Rental Assistance Contract Eliminates the requirement that the rental assistance contract must begin on the first day of the term of lease to assist tenants that are currently housed (including existing TBRA households) but have experienced sudden financial hardship as a result of the COVID-19 pandemic. Waiver applicable through December 31, 2020, for TBRA provided in response to the COVID-19 pandemic. PJs using this waiver authority must execute a rental assistance contract with the owner or tenant for a term mutually agreed upon by all parties, but not to exceed the December 31, 2020, waiver period.</p> |
| X | <p>5. Tenant Protections – Lease Permits PJs to assist individuals currently housed but facing financial hardship, where an executed lease is already in place. The requirement that a tenant assisted by TBRA have a lease that complies with the requirements of 24 CFR 92.253(a) & (b) is waived through December 31, 2020, for rental assistance provided to tenants already housed who have an executed lease. PJs are required to execute a rental assistance contract with the tenant for a term mutually agreed upon by all parties, but not to exceed the waiver period ending on December 31, 2020. PJs must still comply with all VAWA requirements.</p> |
| X | <p>6. Housing Quality Standards Permits PJs to rapidly house or assist households affected by COVID-19 without requiring an initial HQS inspection. This waiver is applicable to TBRA provided to tenant households experiencing financial hardship through December 31, 2020. The lead-safe housing requirements of 24 CFR part 35, subpart M, made applicable to units leased by recipients of HOME TBRA cannot be waived. Units built before 1978 must undergo visual evaluation and paint repair in accordance with 24 CFR Part 35, subpart M. PJs using this waiver authority must establish procedures to minimize the risk that tenants are in housing that does not meet HQS. Physical inspections must occur within 120 days of December 31, 2020.</p> |
| X | <p>7. Annual Inspection of Units Occupied by Recipients of HOME TBRA Waives the requirement that annual inspections be performed according to schedule. Applies to annual HQS re-inspections required to occur from April 10, 2020 through December 31, 2020. Within 120 days of December 31, 2020, PJs must physically inspect units that would have been subject to HQS inspections during the waiver period.</p> |
| X | <p>8. Income Determinations Permit PJs to obtain a written statement of the amount of the family’s anticipated annual income and household size, along with a certification that the information is complete and accurate (following 24 CFR 92.203(a)(1)(ii)) in lieu of reviewing source documentation. Applies to TBRA provided to households experiencing financial hardship through December 31, 2020. Tenant’s self-certification must indicate how the tenant’s financial situation has changed and must include all income, including any unemployment or emergency benefits received by the tenant. However, for purposes of a tenant’s self-certification, emergency tax relief (commonly referred to as stimulus payments) should not be included as an emergency benefit. The PJ must include tenant income certifications in each project file.</p> |



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Public Comment Period

The amended 2015-2019 Consolidated Plan and amended 2019 Annual Action Plan is available for public comment Monday, May 11, 2020, through Tuesday, May 19, 2020.

Kentucky has amended the 2015-2019 Consolidated Plan and 2019 Annual Action Plan and is receiving written comments to obtain public input. Written comments will be accepted, and where applicable, will be incorporated into the document.

The Consolidated Plan is the Commonwealth's application and distribution plan for the U.S. Department of Housing and Urban Development, Office of Community Planning and Development Programs (CDBG, ESG, HTF, HOME, and HOPWA). Kentucky Housing Corporation (KHC) and the Department for Local Government (DLG) are the agencies responsible for submission of the plan to HUD.

KHC and DLG recently received additional funding allocations through the CARES Act for CDBG, ESG, and HOPWA, necessitating amendments to planning documents.

The amended 2015-2019 Consolidated Plan and 2019 Annual Action Plan are available for review on [KHC's website](#). Please send written comments by email to corpplanreport@kyhousing.org.

Equal Housing and Equal Employment Opportunity



Career Opportunities

KHC has the following positions available. Join us in helping Kentuckians find safe, quality, affordable housing!

Continuum of Care (CoC) Systems Specialist

Housing Contract Administration

Salary Range: \$50,133 - \$62,666

Please respond no later than **Thursday, May 14, 2020**.

Assistant Controller

Accounting

6/16/2020

May 11, 2020 - Public Comment Period and Career Opportunities

Salary Range: \$57,653 - 72,066

Please respond no later than **Thursday, May 14, 2020**.

Full details are available on [KHC's website](#), under About, Careers, [Job Opportunities](#).

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2/2

From: [Mike Hynes](#)
To: [CoroPlanReport](#)
Subject: Consolidated Plan Amendment Comments
Date: Thursday, May 14, 2020 2:56:51 PM
Attachments: [Hynes_-_Mike-revised-email-signature-01062020.png](#)

Please accept this communication as comments to the amendment to the Consolidated Plan.

Relative to the additional funding provided through the CARES Act, in particular the CDBG-CV, this funding should be dedicated to the provision of gap financing for affordable housing developments which have already been funded through KHC's tax-exempt bond program with a particular emphasis on projects where the nature is such that renovations are planned to be completed on properties where residents are in place. Additional costs are being incurred on these developments in order to ensure the safety of both the residents and the workers completing the renovations and this funding would greatly assist in that regard.

Further, all of these additional funds should be made available statewide, regardless of whether the applicant / project lies within the boundaries of another Participating Jurisdiction.

Thank you.

Mike A. Hynes, CPA, CCIM
Chief Executive Officer - Broker



 859-977-6915
 859-276-5388  859-212-6199
 mhynes@winterwoodonline.com
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From: [Zach Worsham](#)
To: [CorpPlanReport](#)
Subject: Consolidated Plan Amendment Comments
Date: Friday, May 15, 2020 10:12:25 AM
Attachments: [Worsham -Zach-revised-email-signature.png](#)

Please see comments below in regards to the amendment to the consolidated plan:

- The additional CDBG dollars should be made available to finance affordable housing projects approved through Kentucky Housings Tax Exempt Bond Program. As a direct impact of the COVID-19 outbreak the 4% LIHTC rate has dropped to 3.08% leaving many tax exempt bond programs with a gap in financing due to reduced equity.
- These additional funds should be made available to all communities including Participating Jurisdictions.

Best,

Zach Worsham
Chief Operating Officer



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 zworsham@winterwoodonline.com
 winterwoodonline.com

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From: [Steven Kersey](#)
To: [CompPlanReport](#)
Subject: CDBG Funding
Date: Friday, May 15, 2020 4:49:44 PM

Dear Sirs:

I write to encourage the DLG to consider two points for the use of the CDBG funds allocated for KY as part of the CARES Act:

- That a portion of the CDBG dollars can be used as gap financing for projects funded through Kentucky Housings Tax-Exempt Bond programs.
- That DLG lift their restriction on funding projects in Participating Jurisdictions, so they can be deployed for projects in those jurisdictions

Best,
SK

--

KERSEY AND KERSEY | ARCHITECTS

Steven Kersey, AIA

LOUISVILLE KENTUCKY OFFICE
839 East Gray Street
Louisville, KY 40204
Tel 502-583-0094

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Please consider the environment before printing this e-mail

From: [Steven Kersey](#)
To: [ComPlanReport](#)
Subject: CDBG Funding and comment period
Date: Saturday, May 16, 2020 2:10:40 PM

Dear Sir/Madam:

I understand that the KHC and DLG are considering comments with respect to the CDBG funding through the CARES Act.

I offer two comments for consideration::

- A portion of the CDBG dollars should be used as gap financing for projects funded through Kentucky Housings Tax-Exempt Bond programs.
- That DLG lift their restriction on funding projects in Participating Jurisdictions and allow applications for projects in Lexington and elsewhere.

Best,

Steven Kersey

--

KERSEY AND KERSEY | ARCHITECTS

Steven Kersey, AIA

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From: [Cassie Hudson](#)
To: [CorrPlanReport](#)
Subject: Public Comments
Date: Tuesday, May 19, 2020 12:18:50 PM

1. Seems that the focus in the housing program areas is for multi-family preservation. If you live in an rural area that does not have a large existing affordable rental housing stock, then this funding would not help in housing. If housing is a priority, please include all aspects of housing which include rehab, new construction for both homeowner and rental activities.

2. For most City and County governments, Public Facilities is their largest need and concern. With the threshold requirement only allowing City and County governments to apply for one application, most of them will apply for Public Facilities and this eliminates applying CDBG for housing. During this pandemic, it would be helpful for City and County governments to be able to apply for more than one application. Even though Public Facilities (Water/Sewer) are a need, housing in rural areas are also greatly needed. Housing need assessments document that substandard housing exist mostly in rural areas. CDBG Housing is just much as a need as CDBG Public Facilities.

*Cassie Hudson
Partnership Housing Executive Director
PO Box 997 Booneville, KY 41314
Phone (606) 593-7296
Fax (606) 593-7781
cassie.hudson@ymail.com*



May 18, 2020

Ms. Erica Abrams Yan
Corporation Planning and Accountability Department
Kentucky Housing Corporation
1231 Louisville Road
Frankfort, KY 40601

RE: 2020-2024 Consolidated Action Plan Comments
Email to CorpPlanReport@kyhousing.org

Fahe appreciates Kentucky Housing Corporation and the Department for Local Government providing the opportunity to submit comments for the Amended 5 Year Consolidated Plan for 2015-2019 and the 2019 Action Plan. I would like to share several comments on behalf of Fahe based on our 16 nonprofit Members and our shared work in Appalachian counties.

The information identifies spending the CARES Act funding initial allocation through regular channels: CDBG-CV (\$15.6M), ESG-CV (\$8.8M) and HOPWA-CV (\$129,762). CDBG expanded the description of Public Services (including but not limited to those concerned with employment, crime prevention, childcare, health, drug abuse and education). ESG-CV has modified the description for additional rental assistance. KHC and DLG have the ability to increase existing grantee's amounts and the ability to put the funding out for additional applications. CDBG has an open window for applications and there will be the opportunity to apply for public serves under the new description.

Please consider our comments to the proposed amendment below:

- 1) CDBG Housing program area received 12% of the CDBG initial allocation in the 2019 Action Plan, but received less than 12% allocation of the CDBG-CV. The Housing program area is an opportunity to address direct impacts of COVID-19 particularly with rehab assistance for homeowners. The request would be to allocate additional funds for housing activity. With the relationship between affordable housing non-profits and local governments, the existing partnerships would enhance housing activity as a COVID-19 response.
- 2) CDBG Housing Program Area is an effective resource for both homeowners and renters and new construction and rehabilitation activities should be

considered as priorities as well as the preservation of multi-family housing units, particularly those with rental assistance.

- 3) CDBG requires a jurisdiction must choose a Public Facilities (water/sewer), Housing, or Community Project application as there is a threshold for one application per jurisdiction. During this pandemic, it would seem helpful to have the ability to apply for funding in more than one of these identified program areas based on need. We would ask that this threshold factor be reviewed and modified. For rural communities, water and sewer projects are so very important to local governments that housing projects are not applied for; however, housing needs assessments document the substandard housing that exists in particular in rural communities. As there are additional CDBG-CV funds being made available in all the program areas as a response to COVID-19, it would benefit communities that have high priority needs to modify the threshold factors to favor submission of more than one application per jurisdiction. It is appreciated that additional submissions for Public Services and Economic Development are acceptable.
- 4) CDBG Public Services program area should include the use of these funds for housing payments for up to three consecutive months for either rent or mortgage payments as per the CDBG regs. With HUD lifting the cap for CDBG in the public services program area during the COVID-19 pandemic, it would be helpful to include the housing payments as an expanded use of these funds as we are unsure of the ongoing effects on communities – across the housing spectrum including tenants, landlords, housing and service providers – during the pandemic. With housing non-profits' relationships with local governments, there is an opportunity to utilize these funds in a targeted manner for the Commonwealth's lower-income, and most at-risk, families with housing assistance resources that can assist families to keep their affordable housing – be it rental or homeownership. These lower income families are most likely to suffer income disruptions during COVID-19 and the opportunity to assist those families with rental or mortgage assistance could be invaluable to the housing situation of those families. Local Governments working with housing providers could assure the compliance of providing the assistance to those households that are in need.
- 5) The proposed amendment to the Action Plan does not change the matching fund requirements. In a time such as this when every community has lost substantial tax revenue, meeting a match requirement for a needed grant will be difficult if not impossible. Please consider removing or, at a minimum, reducing the match requirements for applicants. These present an unnecessary barrier in these fiscally difficult times for all cities and counties.

Thank you for your consideration of our comments. It is much appreciated that Kentucky has the proposed Amended Action Plan and 5 Yr. Con Plan out for comment as it is important to have the CV funds available, and other CARES Act funding, for the citizens of the Commonwealth that need assistance and particularly during the effects of the COVID-19 pandemic.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Vonda Poynter".

Vonda Poynter
SVP of Membership

From: [Scott McReynolds](#)
To: [CoroPlanReport](#)
Subject: Comments on Amended 2015-2019 Consolidated Plan and amended 2019 Annual Action Plan
Date: Tuesday, May 19, 2020 5:19:09 PM
Attachments: [image002.png](#)

Dear Sir or Madam,

Thank you for the opportunity to comment on the amended 2015-2019 Consolidated Plan and amended 2019 Annual Action Plan. As the director of the housing nonprofit serving 4 of the poorest counties in the state, I wish to make the following comments:

1. Although there are established priorities in housing program areas for multi-family housing preservation, given the additional funding as well as the needs created by COVID-19 please include other housing as a priority including home rehabilitation, new construction for both homeowner activity and rental activity.
2. Housing activities initially received 12% of the CDBG allocation, but received less significantly less than 12% of the additional allocation of the CDBG-CV. The Housing program area is an opportunity to address direct impacts of COVID-19 particularly with rehab assistance for homeowners. The Housing activity allocation should be increased.
3. For CDBG a jurisdiction must choose a Public Facilities (water/sewer), Housing, or Community Project application as a threshold for one application per jurisdiction. During this pandemic, the ability to apply for funding in more than one of these identified program areas based on need would help rural communities respond to the needs created by COVID-19. Therefore, the threshold factors should be reviewed and modified to allow this. For rural communities, water and sewer projects are so very important to local governments that housing projects are often not applied for; however, housing needs assessments document the substandard housing that exists in particular in rural communities. As there are additional CDBG-CV funds being made available in all the program areas as a response to COVID-19, it would benefit communities that have high priority needs to modify the threshold factors to favor submission of more applications.
4. CDBG Pubic Services should include the use of these funds for housing payments for up to three consecutive months for either rent or mortgage payments as per the CDBG regulations. With HUD lifting the 30% cap for CDBG in the public services program area during the COVID-19 pandemic, it would be helpful to include the housing payments as an expanded use of these funds as we are unsure of the ongoing effects on communities – including tenants, landlords, housing and service providers – during the pandemic. With housing non-profits' relationships with local governments, there is an opportunity to utilize these funds in a targeted manner for the Commonwealth's lower-income, and most at-risk, families with housing assistance resources that can assist families to keep their affordable housing – be it rental or homeownership.

5. There are no changes in the proposed Amendment regarding matching requirements. Most cities and counties are not going to have funds for the Priority One rating which includes matching funds in most if not all program areas. Communities are losing tax revenue due to business interruptions, so any match requirement would be difficult. We are asking that consideration be given to removing the match requirements for applications under present Covid-19 circumstances.

6.

Thank you for the opportunity to make comment on these amended plans.

SCOTT MCREYNOLDS | 606•436•0497 | www.HDAHome.org

Housing Development Alliance

Executive Director, NMLS #165507

Cell: 606-438-0530

Building Homes, Building Communities.



From: [Tom Manning-Beavin](#)
To: [CorrPlanReport](#)
Subject: comments on Proposed Amendment to the KY Consolidated Plan and 2019 Action Plan
Date: Tuesday, May 19, 2020 5:26:31 PM

Dear KHC staff and others responsible for utilization of the funds made available in the CARES Act:

I am writing today to comment on the Proposed Amendment to Kentucky's Consolidated Plan and the 2019 Action Plan, to address the use of funding made available in the 2020 CARES Act.

Please include owner-occupied rehab, as well as new construction for both homeowner activity and rental in the Amended Plan. Please also be sure to allocation CDBG-CV funds to all housing activities at a rate that at least matches the original allocation rate for CDBG funding (which was 12%). Allocating fewer dollars to housing activities on a pro rata basis hurts the members of our communities that are most in need.

Also, when using CDBG funds, a jurisdiction can only have one Public Facilities (water/sewer), Housing, or Community Project application open at a time. During this pandemic, it help to have the ability to apply for funding in more than one of these identified program areas based on need. The limitation of having only one of these projects open at a time means that rural communities must choose between safe water and decent, sanitary housing, when in actuality both are critical to a healthy community. Our rural communities shouldn't have to choose one or the other, particularly during this pandemic.

In addition, Kentucky should allow housing payments for up to three consecutive months for either rent or mortgage payments, as per the CDBG regulations, to be an eligible use of CDBG Pubic Services funds. With HUD lifting the 30% cap for CDBG in the public services program area during the COVID 19 pandemic, it would be helpful to include the housing payments as an expanded use of these funds, because of the uncertainty related to the ongoing and long-term economic effects the pandemic will have on communities – including tenants, landlords, housing and service providers. With housing non-profits' relationships with local governments, there is an opportunity to utilize these funds in a targeted manner for the Commonwealth's lower-income, and most at-risk, families with housing assistance resources that can assist families to keep their affordable housing – be it rental or homeownership.

Lastly, I encourage Kentucky to change the matching requirements. Most cities and counties are not going to have funds for the Priority One rating which includes matching funds in most if not all program areas. Communities are losing tax revenue due to business interruptions, so any match requirement would be difficult. We are asking that consideration be given to removing the match requirements for applications under present Covid-19 circumstances.

Thank you for your consideration of these comments.

Best wishes,
Tom Manning-Beavin

Tom Manning-Beavin

President & CEO

Office: 606-784-2131, x 240

Cell: 606-224-6190

Fax: 606-784-2171

www.frontierky.org

5445 Flemingsburg Rd

Morehead, KY 40351

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February 19, 2019

Corporate Planning and Accountability Department
Kentucky Housing Corporation
1231 Louisville Road
Frankfort, KY 40601

ATTN: Ms. Erica A. Yan

RE: Comments on Drafting the 2019 Consolidated Action Plan

Dear Ms. Yan,

Thank you for the opportunity to comment regarding the 2019 Consolidated Action Plan. We appreciate the staff of Kentucky Housing Corporation and the Department of Local Government for their planning work to establish goals and vision for addressing Kentucky's housing needs. I would like to make a number of comments on behalf of Fahe.

We are all aware that federal funds are very needed but not as available as several years ago to stimulate the economy for impact in the housing markets we serve. In representing Fahe, we work in the Appalachian Counties of Eastern Kentucky and face a per capita income that is 63% of the national average and a poverty rate of 26% compared to the rest of Kentucky at 18% and a national rate of 15%. In addition, there are over 116,810 cost-burdened households in Appalachian Kentucky (in particular due to utility costs), many more have inadequate plumbing, or are overcrowded.

The income of the families we serve is not sufficient to rent a modest two-bedroom apartment without financially burdening the household, nor is it adequate to support affordable homeownership. Homeownership is the primary mechanism through which the Commonwealth's low-income families accumulate wealth, build assets, and break intergenerational cycles of poverty. Serving this area of the Commonwealth requires deep subsidy and programmatic flexibility as we have commented before.

Affordable Rental and Single Family Housing Production

We recommend program design that empowers local communities to address their housing needs and continued investment in local leadership through the local CDCs and CHDOs and would recommend continued and increased support of CHDOs. CHDO's have been allowed to retain CHDO proceeds, which has allowed

organizations to greatly increase their production of safe, decent and affordable housing. Many of these CHDO's operate in the most difficult to serve areas of Kentucky. This important investment in operating capacity has many significant benefits to KHC, including:

- o Increasing efficiency of the CHDO's by increasing capacity,
- o Enabling CHDO's to successfully compete for non-KHC funding (e.g. Federal Home Loan Bank's AHP program, Rural Development's Rural Home Loan Partnership, and other HUD funding such as SHOP), and
- o Increasing CHDO's self-sufficiency and allowing CHDO's to fulfill the HUD mandated mission of developing housing that meets the specific needs of their communities.
- o Even with the possibility of decreased HOME funds we ask KHC to consider continued CHDO operating funds for the organization's internal capacity strength and continued/increased CHDO program funds (KHC has always provided CHDO funding in excess of the 15% requirement; it is much appreciated and has increased production across the region).

Funding available for nonprofit programs is not sufficient to meet the needs in rural areas for affordable rental housing. The National Housing Trust Fund could be an option for renters' affordability needs as the state's allocation is utilized for rental housing needs of very low and extremely low income households. This need is well documented and the amount of HOME TBRA for competitive funding which is an effective solution for renters' affordability needs continues to be threatened. For the 2019 Consolidated Action Plan, the use of the National Housing Trust Fund will be an important resource/asset for rental housing development and operation of very low income housing in Kentucky.

Fahe encourages the continued use of programmatic guidelines that promote flexibility and create incentives for affordable housing developers to increase their production and the preservation of safe, decent, affordable single- and multi-family housing units throughout the state. There is a need to have smaller non-credit rental production funding available through HOME, AHTF and SMAL.

KHC allows long term deferred loans to reduce debt service on a HOME rental project. Would KHC consider utilizing the practice of forgivable, deferred loans, which would allow the loan to be forgiven 1/30th per year? This would be in line with depreciation of the properties from an auditor's perspective. HUD allows HOME funds to be forgivable, deferred loans if necessitated by the financing structure for homebuyers, this might be a mechanism for rental projects.

The Housing Policy Advisory Committee's role should be stronger in respect to its value in the process of reviewing programs and developing the longer term plans such as this Consolidated Plan as they relate to housing needs.

For both the HOME and CDBG Program, in consideration of the SOAR initiative and the Promise Zone designation, Fahe would ask that priority be given for projects located in these areas as these initiatives are elevating regional needs. KHC and DLG have an opportunity to impact both these initiatives positively with available resources.

Community Develop Block Grant Program

An increase in CDBG housing dollars is always helpful in meeting the continued housing needs across the Commonwealth. Deteriorated and dilapidated housing stock needs to be eliminated with standard affordable housing units constructed as infill. Doing so increases property values in our communities, provides affordable sites for redevelopment, and improves the livability of our communities. CDBG used in construction is primarily targeted for homeowner units through activities such as rehabilitation or reconstruction and it has also been beneficial to utilize CDBG housing funds to target affordable rental housing recently. We encourage the use of CDBG in the housing program area.

We would like to ask DLG to consider a mechanism to address housing deficiencies in the ARC counties that would allow communities to ask for funding in both public facilities and housing program areas. While the thresholds limiting application submittal is understandable because of the pressing public facilities needs, this precludes cities and counties in Appalachian Kentucky from also addressing the deplorable housing conditions in their local communities. SOAR and Promise Zone areas might be a basis for lesser threshold requirements allowing two separate program area applications for consideration.

For those facilities such as the Recovery Kentucky Program where CDBG has funded public services, we encourage continued funding for those facility's operations as the opioid crisis is impacting our Commonwealth significantly.

Thank you again for the opportunity to comment on the 2019 Consolidated Action Plan. We look forward to working with you in the future.

Sincerely,



Jim King
President & CEO



People's Self-Help Housing, Inc.

307 KY 59, Vanceburg, KY 41179 7648

Providing Affordable Housing Opportunities

in Lewis County since 1982

visit us at www.pshhinc.org

Erica Abrams Yan
Kentucky Housing Corporation
1231 Louisville Road
Frankfort, KY 40601

May 17, 2019

RE: 2019 Consolidated Annual Action Plan Comments

Ms. Abrams Yan,

Thank you for this opportunity to submit written comments regarding the 2019 Annual Draft Action Plan.

The 2018 Housing Needs Assessment Executive Summary prepared by the Gatton College of Business and Economics for Kentucky Housing Corporation, in their Demand Analysis addressing the Housing Choice Voucher Program (HCV), stated that approximately 571,301 households in Kentucky were eligible for vouchers in FY17, however only 31,651 HCV's were used in Kentucky that year, resulting in 95% of eligible households being unable to receive HCV's during that time period (see page 4 of the summary). And yet KHC's Housing Choice Voucher Program's waiting list has been closed for years, making it impossible for eligible families to even get on the waiting list.

The Housing Needs Assessment also showed a 67% increase in renter households from 2006 to 2016 in Lewis County, the area we have served since 1982. Lewis County is an Appalachian Regional Commission (ARC) distressed county with persistently high poverty rates. Historically it has also been a county with high homeownership rates and a high rate of substandard housing units. The move to rental housing is disturbing and not by choice. Lewis County residents have a strong preference of owning their home, even if it is severely substandard. Since the beginning of the Great Recession in 2006, very low and no income households have been driven to subsidized multifamily rental properties since they can no longer afford to own their home. Unfortunately, HCV's or HOME Tenant Based Rental Assistance (TBRA) is also required to assist with rent and utilities expenses for those with little or no income.

Since the waiting list for HCV's continue to be closed, it is imperative in poverty stricken rural areas like ours to have sufficient HOME TBRA funding to fill the gap. To do so, the HOME TBRA allocation needs to be substantially increased. Knowing HOME funding is very limited, I am suggesting reallocating one million dollars to HOME TBRA from multifamily rental. Multifamily has been using the majority of the HOME funding allocation over the past decade plus an additional \$3,000,000 annually of new money from the recently funded National Housing Trust Fund. If we cannot make rental assistance available for the most needy, they will end up homelessness and fall into all the negative impacts and challenges created by household instability.

Page 1 of 2

PH: (606) 796-6333 FAX: (606) 796-2696



TTY: for the Hearing-Impaired 1-800-648-6057



People's Self-Help Housing, Inc.

307 KY 59, Vanceburg, KY 41179-7648

Providing Affordable Housing Opportunities
in Lewis County since 1982

visit us at www.ps/ahhc.org

Two other comments:

One, as an active member of the Housing Policy Advisory Committee (HPAC) for ten years and having served as the Chair of the committee for three years, I believe HPAC should be more involved in surfacing and recommending solutions to housing needs in the Commonwealth. HPAC meetings are always well attended and committee members representing state offices and rural and urban nonprofits are engaged. Unfortunately, most of the agenda consists of reports on what KHC has done rather than seeking input on housing needs from committee members and then discussing what could or should be done.

Second, an index to the Consolidated Action Plan would be helpful to locate the various topics in the 91 page document.

Respectfully submitted,

Dave Kreher
Executive Director

Page 2 of 2

PHONE (606) 796-4333 FAX (606) 796-2606



TDD for the Hearing-Impaired 1-800-648-0057



May 30, 2019

Erica Abrams Yan
Kentucky Housing Corporation
1231 Louisville Road
Frankfort, KY 40601
Via email: corpplanreport@kyhousing.org

Re: Draft 2019 Action Plan

Dear Ms. Yan:

Thank you for providing the opportunity to comment on the Action Plan. We commend you and the staff of Kentucky Housing Corporation for your commitment to housing vulnerable Kentuckians, and we appreciate your comprehensive and thoughtful drafting of the annual update.

The mission of the Homeless and Housing Coalition of Kentucky is to eliminate the threat of homelessness and fulfill the promise of affordable housing for all Kentuckians. As we are a membership-based organization, we strive to balance the varying needs of our members and advocate for a full array of housing options in the Commonwealth. We also strive to be a strong external partner to KHC through our facilitation and staffing of the Kentucky Interagency Council on Homelessness (KICHC) and drafting of the Strategic Plan to End Homelessness (most recently updated in 2018). Additionally, we provide informal feedback through our participation on the Balance-of-State Continuum of Care Advisory Board and the state Affordable Housing Trust Fund Advisory Board.

Please note that the official membership of KICHC is now reflected as follows:

Per [KRS 194A.735](#), the council shall include but not be limited to the following members:

1. The secretary of the Cabinet for Health and Family Services;
2. The executive director of the Homeless and Housing Coalition of Kentucky;
3. The chief executive officer of the Kentucky Housing Corporation;
4. The commissioner of the Kentucky Department of Veterans' Affairs;
5. The secretary of the Justice and Public Safety Cabinet;
6. The secretary of the Education and Workforce Development Cabinet;
7. The secretary of the Transportation Cabinet;
8. The executive director of the Administrative Office of the Courts;

306 W. Main Street, Suite 207
Frankfort, KY 40601
502.223.1834
www.hhck.org





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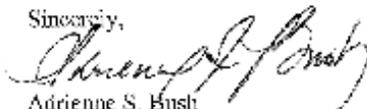
9. The state budget director;
10. A representative from the Kentucky Housing Association, representing public housing authorities, appointed by the Governor for a two (2) year term; and
11. An individual who has previously experienced homelessness and addiction, appointed by the Governor for a two (2) year term.

We commend KHC's commitment to coordinating the programs contained within the Consolidated Plan with mainstream housing resources, as in the case of the set-aside Housing Choice Vouchers (VETT and Moving On initiatives). Designating HCVs for specific populations will help our members target Limited Continuum of Care and Emergency Solutions Grant funds for chronically homeless and high service need households.

We also commend KHC's commitment to reducing and streamlining of regulatory barriers to housing development and grant administration, particularly through 2 year funding cycles where applicable and targeting HOME funds for homebuyer activities (and targeting other resources for home rehabilitation). However, we would urge KHC to be mindful of the need for a balanced HOME allocation spread between multifamily, homebuyer, and tenant-based rental assistance. All three activities serve important roles in housing development, with local conditions influencing the need for different types of funding.

As always, thank you for the opportunity to comment. Should you need additional information or clarification, please feel free to contact me. Thank you for your consideration of our comments.

Sincerely,



Adrienne S. Bush
Executive Director

/ash

306 W. Main Street, Suite 207
Frankfort, KY 40601
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PERIODO DE COMENTARIOS PÚBLICOS 

EL PLAN DE ACCIÓN CONSOLIDADO 2019 PARA LOS PROGRAMAS DE VIVIENDAS CON SUBVENCIÓN EN BLOQUE DE KENTUCKY, ESTARÁ DISPONIBLE PARA COMENTARIOS PÚBLICOS HASTA EL VIERNES, 31 DE MAYO

El Plan de Acción Anual Consolidado 2019 para los Programas de Viviendas con Subvención en Bloque de Kentucky está disponible para comentarios públicos hasta el viernes 31 de mayo de 2019.

El Plan de Acción Anual Consolidado es el plan de actividades y actividades de la Monocorporación (Monocorporación) para el Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos, por lo que se requiere la oficina de Planeación y Desarrollo Comunitario (CPD), por sus siglas en inglés (KPCDC, EDC, CDBG, HTF y HOPWA), Kentucky Housing Corporation y el Departamento de Gobierno Local, son las agencias responsables de la implementación del plan de acción.

Kentucky ha publicado el Plan de Acción Anual Consolidado y sus modificaciones, así como las invitaciones para comentarios y sugerencias.

En política, se aceptarán comentarios por escrito y cuando correspondiente, se incorporarán en el documento. El plan cubre el período de tiempo del 1 de julio de 2019 al 30 de junio de 2021.

El Plan de Acción Anual está disponible para su revisión en línea en la página web de Kentucky Housing Corporation (KHC), por sus siglas en inglés en: <http://www.kyhousing.org> Resource Plan and Coordination Page. Consulte el Plan de Acción Anual en su computadora por correo a 5184-504-7650. La dirección postal: 1741 Louisville Road, Frankfort, Kentucky 40621. Correo electrónico: corporate@kyhousing.org.

Atención al cliente y servicios de atención al cliente

El Plan de Acción Anual Consolidado de 2019



www.kyhousing.org

Llamada gratuita en Kentucky 800-633-5886 o 5184-504-7650, extensión 2.

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PUBLIC COMMENT PERIOD

THE 2019 CONSOLIDATED ANNUAL ACTION PLAN FOR KENTUCKY'S BLOCK GRANT HOUSING PROGRAMS IS AVAILABLE FOR PUBLIC COMMENT THROUGH MAY 31, 2019

The 2019 Consolidated Annual Action Plan for Kentucky's Block Grant Housing Programs is available for public comment through Friday, May 31, 2019.

The Consolidated Action Plan is the Commonwealth's application and distribution plan for the U.S. Department of Housing and Urban Development (HUD), Office of Community Planning and Development (CPD) Programs (HOME, ESG, CDBG, HTP, and HOPWA), Kentucky Housing Corporation and the Department for Local Government are the agencies responsible for submission of the plan to HUD.

Kentucky has drafted the Annual Consolidated Action Plan and is receiving written comments to obtain public input. Written comments will be accepted, and where applicable, will be incorporated into the document. The plan covers the time period of July 1, 2018, to June 30, 2020. The Consolidated Plan is available for review online at the KHC Web page at www.kyhousing.org/Resources/PlanningDocuments/ConsolidatedPlan. Please send written comments to Erica Abrams Yan, KHC, 1231 Louisville Road, Frankfort, Kentucky 40601 or by email to corpplanning@kyhousing.org.

Equal Housing and
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I, of The Courier-Journal, a newspaper published and printed in the State of Kentucky, County of Jefferson, and having general circulation in the County of Jefferson, who being duly sworn, depose and saith that the advertisement of which the annexed is a true copy and has been published in the said newspaper, once in each issue as follows:

02/01/19

.....
Shelley Hines

Subscribed and sworn to before me this 10 day of February, 2019

Kayla J. [Signature]
Notary Public

11/9/22
Commission expires



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PUBLIC HEARING NOTICE

A PUBLIC HEARING WILL BE HELD TO OBTAIN NEEDS INFORMATION FOR THE 2019 CONSOLIDATED ACTION PLAN FOR KENTUCKY'S BLOCK GRANT HOUSING PROGRAMS.

The Action Plan is the Commonwealth's application and distribution plan for U.S. Department of Housing and Urban Development (HUD), Office of Community Planning and Development, (CPD), Block Grant Programs (HOME, ESG, CDBG, HTF, and HOPWA). Kentucky Housing Corporation and the Department for Local Government are the agencies responsible for submission of the plan to HUD.

Kentucky is in the process of drafting the 2019 Consolidated Action Plan, and a public hearing is being held for the purpose of obtaining public input. Both written and oral comments will be accepted and where applicable, will be incorporated into the document.

The public hearing is scheduled for 11 am EST Wednesday, February 20, 2019 at the Kentucky Housing Corporation West Annex Board Room at 1231 Louisville Road, Frankfort, KY 40601. KHC's campus is handicap accessible. If you are a person with a disability, need information in an alternative format, or speak limited English and require special services at the public hearing, please notify Erica Abrams Yan by February 13, 2019, so that arrangements for those services can be made.

A copy of the current Action Plan is available for review online at <http://www.kyhousing.org/Resources/Planning-Documents/Pages/Consolidated-Plan.aspx>. Send written comments to Corporate Planning and Accountability Department, KHC, 1231 Louisville Road, Frankfort, Kentucky 40601, or by email to CorpPlanReport@kyhousing.org. Please direct questions to Ms. Abrams Yan at (800) 633-0386, extension 577. Those who are hearing-impaired may call TTY/V 711.

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STATE OF KENTUCKY
COUNTY OF FAYETTE

Before me, a Notary Public, and for said County and State, this 1 day
of February, 2019 came Ryan Dixon

Personally known to me, who, being duly sworn, states as follows:

That he is Digital Assistant of
Lexington Herald-Leader, and that said publication date of
February 1, 2019 carried the advertising
of KI Housing Corp Legal
occupying the following space 2 x 4 1/2 lines

Digital Assistant
By [Signature]

(SEAL)

[Signature]
Notary Public

ID # 446885
Commission Expires 8-2-19

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WORK! WORK! WORK!
 Read Careerbuilder every Sunday in the Herald-Leader Classifieds.



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Public Comment Period

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KHC has drafted the Annual Consolidated Action Plan and is receiving written comments to obtain public input. Written comments will be accepted, and where applicable, will be incorporated into the document. The plan covers the time period of Monday, July 1, 2019, to Tuesday, June 30, 2020.

The Draft 2019 Action Plan is available for review on [KHC's website](#) under Resources, Planning Documents, [Consolidated Plan](#). Please send written comments to Erica Abrams Yan, KHC, 1231 Louisville Road, Frankfort, Kentucky 40601; or email corplanreport@kyhousing.org.



