Commonwealth of Kentucky
2015-2019
Consolidated Plan

July 1, 2015 – June 30, 2020

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

HOME INVESTMENT PARTNERSHIPS PROGRAM

EMERGENCY SOLUTIONS GRANT PROGRAM

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS PROGRAM

Prepared by:
Kentucky Housing Corporation
Kentucky Department for Local Government

Submitted to:
U.S. Department of Housing and Urban Development

May 2015

OMB Control No: 2506-0117 (exp. 07/31/2015)

Summary of sections of the plan that have been amended:HOPWA minor amendment changes to section AP35, ProjectsHTF Substantial Amendmento Section ES-05 Executive Summaryo Section PR-15 Citizen Participation Processo Section SP-10 Geographic Prioritieso Section SP-25 Priority Needso Section SP-30 Influence of Market Conditionso Section SP-35 Anticipated Resourceso

Remaining changes are in the 2016 Action Plan

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The Commonwealth of Kentucky 2015 - 2019 Consolidated Plan represents a collaborative endeavor and outlines the affordable housing and community development strategies the state will utilize in allocating funding from the following U.S. Department of Housing and Urban Development (HUD) block grant programs that are allocated to the state:

- 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 (HTF)*

Development of the plan included participation and input from the general public, local governments, non-profit housing and services providers, other state agencies, housing developers, and other interested parties.

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/Data-Library/Pages/Consolidated-Plan.aspx.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

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

During the time span of the previous Consolidated Plan, unemployment was very high and the economy was in a severe downturn. As a result, foreclosures were very high, the single-family mortgage market

adjusted to economic changes by tightening underwriting standards, and federal funding decreased substantially. The challenge of the past several years has been to assist persons who were in danger of losing their homes through foreclosure. In addition, the 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 themes that remain constant over time, are that 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 that there remains a severe shortage in the supply of affordable, decent housing. With the economic recovery beginning, and unemployment rates dropping, Kentucky expects to see a reduction in foreclosures and an increase in families' abilities to access credit to purchase homes. The aging housing stock remains of great concern. Older single family homes may not be energy efficient, contributing to housing cost burden. Multifamily housing units constructed decades ago are in need of 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 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.

4. Summary of citizen participation process and consultation process

KHC and DLG value input from Kentucky citizens in the Consolidated Planning process. Participation was solicited through legal notices, electronic mail notification to a list of over 15,000 subscribers, and social media, announcing the time and location of the Consolidated Plan public hearing and soliciting feedback through surveys available online and through agencies that partner with KHC. The results of these surveys are attached. The surveys were also made available through the network of public libraries throughout the state.

KHC and DLG consulted with numerous agencies and partners throughout the process. These consulations included direct contact, online surveys, public hearings, and presentations at meetings of statutory committees and other groups. Additional details are included in the consultation section of this plan.

KHC has submitted two amendments to this Consolidated Plan – a minor amendment to include funded HOPWA projects to the 2015 Action Plan, and a substantial amendment to include provisions of and allocation of resources under the new National Housing Trust Fund (HTF) program. In preparation for the HTF amendment, KHC held a series of developer forums including discussion of the HTF in conjunction

with discussions about the low-income housing tax credit 2017-2018 Qualified Allocation Plan (QAP). This process was undertaken simultaneously as the NHTF funds will be awarded in conjunction with housing tax credits to eligible projects.

A public hearing was held on June 30, 2016 to obtain additional needs information and to allow citizens and the general public to participate in the process. The hearing was held in conjunction with the hearing for the 2017/2018 proposed Qualified Allocation Plan. Two persons presented comments on the HTF at the hearing.

5. Summary of public comments

A summary of the public comment and survey responses recieved during the drafting phase and written comment period *for the Consolidated Plan* are attached to this plan.

During the public hearing for the HTF substantial amendment, Mary O'Dougherty with the Kentucky Coalition Against Domestic Violence and Curtis Stauffer with the Housing and Homeless Coalition both spoke. Both spoke in support of utilizing HTF funds for operational support for projects. In addition, they asked that preference for funds be given to projects that serve special needs populations including, but not limited to homeless, domestic violence survivors, persons with disabilities, and persons with Medicaid that need access to housing.

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

There were no comments or views not accepted.

7. Summary

The challenge over the next five years is to provide affordable housing and economic opportunities with dwindling resources. Many of the issues that Kentucky has faced for decades remain - high levels of poverty, low educational attainment, aging housing stock, shortage of affordable housing, and housing cost burden to name a few. This five-year plan addresses the state's intention to utilize limited funding in the most effective means possible.

Summary of sections of the plan that have been amended:

- *HOPWA minor amendment – changes to section AP35, Projects*
- HTF Substantial Amendment*Section ES-05 Executive SummarySection PR-15 Citizen Participation ProcessSection SP-10 Geographic PrioritiesSection SP-25 Priority NeedsSection SP-30 Influence of*

Market ConditionsSection SP-35 Anticipated ResourcesRemaining changes are in the 2016 Action Plan

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Table 1 – Responsible Agencies

Narrative

KHC is the lead agency for preparation of the Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Report (CAPER) in partnership with the Kentucky Department for Local Government.

Consolidated Plan Public Contact Information

For questions regarding the Consolidated Plan, contact:

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To request a Certficate of Consistency with the Consolidated Plan, visit KHC's Web site at http://www.kyhousing.org/page.aspx?id=330

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

1. Introduction

KHC and DLG endeavored to consult with partners, state and federal agencies, local governments, non-profit and for-profit housing developers, and many other parties interested in providing input prior to and during the drafting of this Consolidated Plan. Both DLG and KHC undertook online surveys, receiving hundreds of responses. KHC hosted a summit on housing preservation, which was well-attended. Additionally, information was presented to the statewide Housing Policy Advisory Committee about the plan, requesting input on needs. Consultation with all entities is ongoing throughout the year. In addition to a formal public hearing prior to drafting the Consolidated Plan and 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 continuing to decrease, and great need continuing, many discussions were held with partners, including the possibility that some activities may not be funded. KHC and DLG recieved a high level of response to discussions held with smaller groups, with the statewide Housing Policy Advisory Committee and other committees, and through online surveys. 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.

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 (91.215(l))

The state's Housing Policy Advisory Committee plays an active role in advising KHC regarding affordable housing issues. The advisory committee consists of ten ex-officio state government members, seventeen at-large members appointed by KHC's Board, one member of the Senate, and one 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.

KHC partners with the state Division of Behavioral Health to host SOAR (SSI/SSDI, Outreach, Access, and Recovery) trainings throughout the state. SOAR teaches case managers how to complete disability applications more thoroughly. 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.

Samaritan Projects and other permanent supportive housing projects funded through the Continuum of Care (CoC), 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. It is renewable annually through the CoC application.

As KHC develops self-sufficiency further, local partnerships must be established to assist participants. The CHFS open child protection cases with participants from time-to-time. In these cases, KHC must develop relationships with local office to provide support to families as well as to CHFS. With mental illness, local partnerships with the community mental health agencies have been established so referrals are easily made.

In future years, KHC will continue to enhance these partnerships and develop new partnerships as needs arise with participants.

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 is the lead agency, coordinating the Balance of State Continuum of Care (118 of Kentucky's 120 counties). In addition to coordinating the Balance of State CoC, KHC works with the state Cabinet for Health and Family Services to manage programs that assist homeless veterans, persons with persistent mental illness, and youth aging out of foster care, three populations that are at high risk of becoming homeless.

KHC and the Housing and Homeless Coalition of Kentucky are the lead agencies for the Kentucky Interagency Council on Homelessness (KICH). KICH is composed of representation from state government, nonprofit agencies, and advocacy agencies who 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.

KHC offers to other agencies that serve the homeless across the state the opportunity to participate in the U.S. Department of Housing and Urban Development’s Continuum of Care (CoC) Program. The CoC is a local or regional system for helping people who are homeless, or at risk of homelessness, by providing housing and services appropriate to the whole range of homeless needs in the community. Through the CoC Program, agencies can serve clients with supportive services, transitional housing, permanent supportive housing, or rapid re-housing.

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

The Kentucky Balance of State COC process begins at the local level with six regional planning entities for 118 counties across the state. The City of Lexington as well as the City of Louisville have their own CoC application process and are funded separately from the Balance of State CoC.

In the Kentucky Balance of State CoC, service providers, developers, community leaders, advocates, financial institutions, and homeless service clients meet as local CoC Planning Boards in each of the six regions. At numerous local planning meetings held throughout the year, participants evaluate their service delivery system, coordinate plans in order 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.

KHC, as the Collaborative Applicant for the Balance of State CoC, has the unique opportunity and ability to reach out to members of the CoC in order 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.

Additionally, KHC holds regional CoC meetings where ESG staff present updates to program guidelines and request feedback on potential changes to the allocation process in future funding rounds. KHC ESG program staff also participate in the CoC process for the Louisville and Lexington area, attending their regular monthly meetings. 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 Balance of State CoC Board which guides the decisions affecting the CoC. The Balance of State CoC Board, made up of 12 agency representatives from across the state and of a cross-section of homeless and special needs service providers, will continue to be a pivotal link to the CoC and the larger services community. The Board will be working with ESG staff on implementation of the HEARTH Act rules, analyzing system performance and recommending funding mechanisms that allow for the best service delivery across the state and across populations. In addition, as the roll-out of the Coordinated Assessment system continues, the CoC Board and KHC will be working to smooth out the bumps along the way.

KHC also communicates very 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. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Kentucky Statewide Housing Policy Advisory Committee
	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 Other government - Federal Other government - State Other government - County Other government - Local 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 Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	KHC presented the Needs Assessment to the Housing Policy Advisory Committee in advance of its public hearing for the Consolidated Plan. KHC emphasized the importance of participation by citizens and agencies in the process, and asked agencies to provide needs information as well as the current state of the affordable housing market in their service areas. Many members of the committee were engaged in the discussion as well as assisting in solicitng public comment to benefit the consolidated plan process.
2	**Agency/Group/Organization**	Next Step
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing participation and comments. This organization focuses on manufactured housing.
3	**Agency/Group/Organization**	Kentucky Habitat for Humanity
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing attendee.
4	**Agency/Group/Organization**	FEDERATION OF APPALACHIAN HOUSING ENTERPRISES (KENTUCKY)
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing attendee; provided comments regarding TBRA. This organization is consulted year-round.
5	**Agency/Group/Organization**	KENTUCKY COALITION AGAINST DOMESTIC VIOLENCE
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing Attendee; also consulted regarding emergency shelter and other housing available for survivors of domestic violence. This organization is consulted year-round.
6	**Agency/Group/Organization**	Homeless and Housing Coalition of Kentucky
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Regional organization Planning organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing attendee; also a partner in the Kentucky Interagency Council on Homelessness; this organization is consulted year-round.
7	**Agency/Group/Organization**	COAP, INC
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing attendee
8	**Agency/Group/Organization**	KENTUCKY HIGHLANDS INVESTMENT CORP
	Agency/Group/Organization Type	Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing attendee; also partner in the Supporting our Appalachian Region initiative.
9	**Agency/Group/Organization**	COMMUNITY VENTURES CORPORATION
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing attendee
10	**Agency/Group/Organization**	HOUSING DEVELOPMENT ALLIANCE, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public hearing attendee; also Housing Policy Advisory Committee attendee

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

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 Opening Doors, the Federal Strategic Plan to end Homelessness (Chronically Homeless, Veterans, Families with Children). 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 and the Department for Local Government's CDBG planning.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

Kentucky cooperates and coordinates with units of general local government extensively with regard to the Community Development Block Grant (CDBG) program. These contacts and relationships include, but are not limited to:

- Conference round tables and the Kentucky Local Issues Conference, Kentucky Assocation 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 Consolidated Plan and Action Plan, as well as the CDBG annual hearing held with the Legislative Research Commission also acts to coordinate implementation of the program.

Narrative (optional):

KHC's legislation includes provisions for statutory advisory committess, 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 consulted with the HPAC and AHTF to obtain needs and market information, as well as discussing the Consolidated Plan process. KHC encouraged 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 general public. KHC and DLG both conducted surveys during the planning and drafting phases of the five-year plan. Input from agencies before, during and after the public hearing is attached to this Consolidated Plan as well as the information gleaned from both KHC's and DLG's online surveys.

KHC hosted a housing preservation focus group and summit in Septembe and October of 2014. The summit was attended by 25 persons representing affordable housing developers, HUD, nonprofit organizations, consultants, legal counsel, bond entities, and others. This group discussed the housing preservation crisis in Kentucky, and planned for additional consultation with a larger group at the Preservation Summit in October. The October summit was attended by more than 150 persons. As a result of the discussions held and information presented at the summit, additional work groups were formed, and an overall strategy for housing preservation was outlined.

PR-15 Citizen 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 Consolidated 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 fourteen (14) days in advance of the date of the hearing and was widely publicized through the use of direct electronic mail notification, Web announcements, social media announcements, and newspaper advertisements. 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. In addition, KHC's partners actively promoted participation in KHC's online survey as well as submission of written comments to KHC.

DLG and KHC also both encouraged citizen participation in the process via online surveys that were advertised in direct mail, eGrams, through partner agencies, through the network of public libraries across the state, and social media.

This Consolidated Plan has been amended twice - a minor amendment to add HOPWA projects to the 2015 Action Plan, and a substantial amendment to include provisions of and allocation of resources under the new National Housing Trust Fund (HTF) program. In preparation for the HTF amendment, KHC held a series of developer forums including discussion of the HTF in conjunction with discussions about the low-income housing tax credit 2017-2018 Qualified Allocation Plan (QAP). This process was undertaken simultaneously as the HTF funds will be awarded in conjunction with housing tax credits to eligible projects.

A public hearing was held on June 30, 2016 to obtain additional needs information and to allow citizens and the general public to participate in the process. The hearing was advertised in the same manner as for the original Consolidated Plan, through legal advertising and eGram service. A specific personal email invitation was sent to a party interested in providing input for special needs housing.

In addition, the substantial amendment was advertised for a 30-day written public comment period from July 9 to August 8, 2016 via the same method as the public hearing.

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Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community Residents of Public and Assisted Housing	A public hearing was held at KHC's offices on February 10, 2015 which was attended by 26 persons. No members of the general public attended.	See attachment to the Consolidated Plan for comments received as a result of the public hearing.	There were no comments not received.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Article	Non-targeted/broad community	Representatives of the Cumberland Valley Area Development District were interviewed for a newspaper article in the Middlesboro Daily News that promoted participation by local governments and individuals in the CDBG survey for the Consolidated Plan.	See survey results	None.	http://www.middlesborodailynews.com/news/news/150481172/CVADD:-Feds-are-listening

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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	Internet Outreach	Non-targeted/broad community	Online surveys were made available to members of the general public. These were advertised via social media and were made available to agencies who assist the general public. They were also made available through all public libraries throughout the state.	See the attachment to the Consolidated Plan for survey results received from the general public.		

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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	Newspaper Article	Non-targeted/broad community	Letters and surveys solicited by partner agencies of families that they assist.	Several letters and surveys from families supporting the use of TBRA funding and describing how it has helped them.	No comments were not accepted	
5	Newspaper Ad	Non-targeted/broad community	Advertisement for HTF substantial amendment hearing - attended by non-profits and multifamily developers.	Two nonprofit entities spoke in support of offering operating subsidy and support for special needs projects.	There were no comments not accepted.	
6	Public Meeting	Non-targeted/broad community	See number 5 above.	See number 5 above.	There were no comments not accepted.	

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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)
7	Internet Outreach	Non-targeted/broad community	See number 5 above - public hearing and subsequent public comment period were advertised via eGram to a subscriber list of over 14,000 persons.	See number 5 above.	There were no comments not accepted.	
8	Newspaper Article	Persons with disabilities Non-targeted/broad community	Public comments are attached to the amended Action Plan.	Attached to the amended Action Plan.	There were no comments not accepted.	

Table 4 – Citizen Participation Outreach

OMB Control No: 2506-0117 (exp. 07/31/2015)

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The following tables provide a summary of Kentucky's housing environment. The data indicates the following:

- Households containing at least one person age 75 or older or with one or more children six years old or younger are more likely to be low-income.
- Incomes have increased 23 percent over the past 10 years, but rents have increased 27 percent, increasing the affordability gap.
- Housing cost burden continues to be the main housing problem for both renters and homeowners, although renter households are more likely to be cost-burdened.
- Of the 88,250 renter households in Kentucky who are housing cost-burdened, 97 percent have incomes below 80 percent of area median income.
- Of the 99,005 renter households in Kentucky who are extremely housing cost-burdened, 97 percent have incomes below 50 percent of area median income.
- Housing units lacking complete plumbing facilities and that are overcrowded are a lesser issue when compared to housing cost burden. In instances where these issues occur, the household is more likely to be of extremely low income.
- The poverty rate in Kentucky remains very high, especially in the Appalachian region counties. The state poverty rate is currently 18.08 percent and includes 756,947 persons.
- The state is in danger of losing nearly 50,000 affordable rental housing units over the next five years as projects end their affordability period and/or are in need of rehabilitation.

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NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	4,041,769	4,316,040	7%
Households	1,591,739	1,681,085	6%
Median Income	$33,672.00	$42,248.00	25%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	226,635	205,760	284,505	168,720	795,465
Small Family Households *	77,685	67,665	107,700	71,315	467,155
Large Family Households *	12,785	11,585	19,920	12,645	57,745
Household contains at least one person 62-74 years of age	33,625	44,395	62,570	36,515	139,170
Household contains at least one person age 75 or older	27,830	41,525	41,370	17,780	48,435
Households with one or more children 6 years old or younger *	44,465	32,375	45,815	26,525	92,440
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Table Analysis

Households below 80 percent of median income - those considered low income - comprise 42 percent of all households. Households with children under age 6 and households with persons age 75 or older are most likely to be in the lowest income categories.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	3,205	1,890	1,540	620	7,255	2,065	1,400	1,225	735	5,425
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,720	845	800	455	3,820	270	305	340	190	1,105
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	3,315	2,895	2,910	1,105	10,225	1,135	1,285	2,055	1,220	5,695
Housing cost burden greater than 50% of income (and none of the above problems)	79,375	21,370	2,765	145	103,655	40,250	24,995	15,680	3,625	84,550

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	17,650	40,660	28,785	3,350	90,445	14,765	26,265	46,215	22,005	109,250
Zero/negative Income (and none of the above problems)	12,240	0	0	0	12,240	7,940	0	0	0	7,940

Table 7 – Housing Problems Table

Data Source: 2007-2011 CHAS

Needs Summary Table Analysis

More than 380,000 households in Kentucky are extremely housing cost-burdened. Renter households below 30 percent of area median income who are extremely housing cost burdened comprise 77 percent of renter households who are extremely housing cost-burdened.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	87,610	27,000	8,010	2,325	124,945	43,720	27,990	19,305	5,765	96,780
Having none of four housing problems	44,375	70,580	99,580	47,290	261,825	30,750	80,190	157,615	113,335	381,890

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	12,240	0	0	0	12,240	7,940	0	0	0	7,940

Table 8 – Housing Problems 2

Data Source: 2007-2011 CHAS

Housing Problems Table Analysis

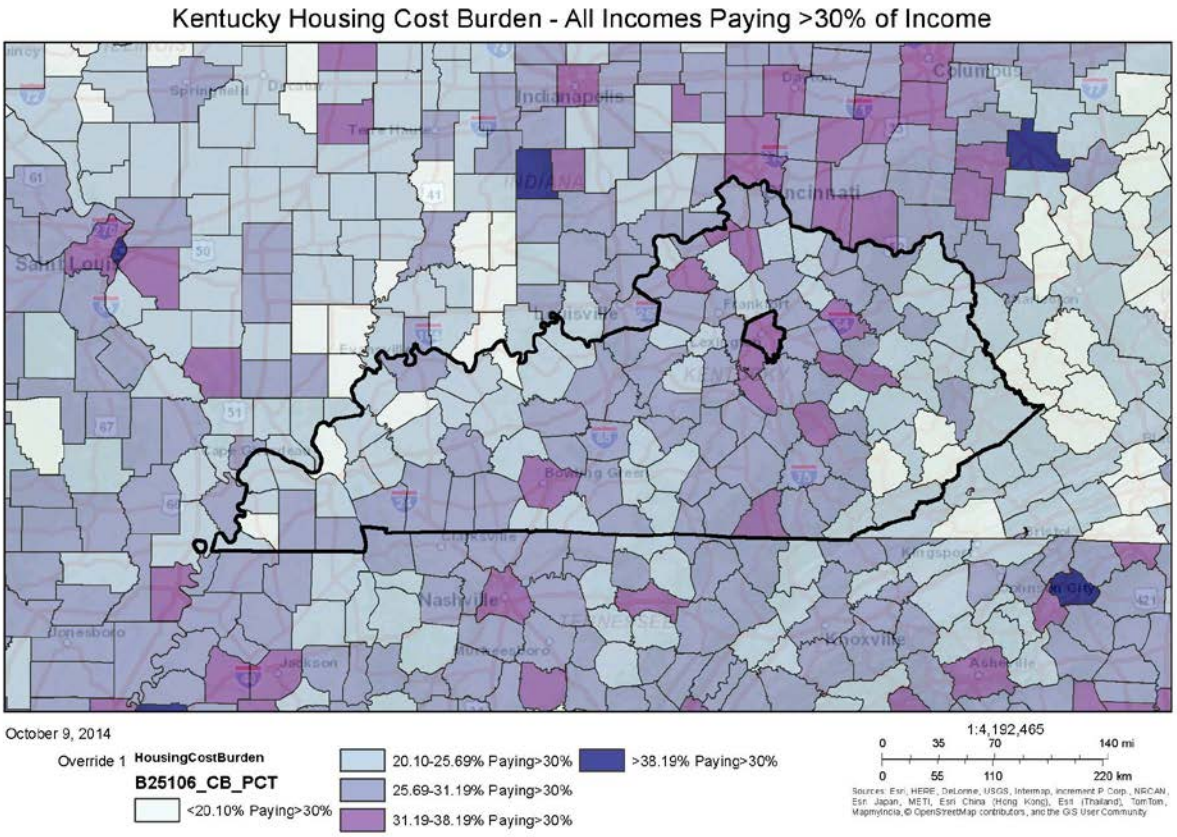
Renter households are more likely than owner households to have one or more of the four housing problems. Data indicate that 30 percent of renter households in the table above and 20 percent of owner households have one or more housing problem. The highest incidence of housing problems for both owners and renters occurs at the lowest income levels (71 percent renters/45 percent owners).

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	41,070	27,250	13,490	81,810	16,835	18,620	28,465	63,920
Large Related	7,185	4,230	2,335	13,750	2,950	3,165	5,090	11,205
Elderly	14,825	11,710	5,225	31,760	22,505	20,420	16,325	59,250
Other	39,930	22,040	11,255	73,225	14,790	10,165	13,190	38,145
Total need by income	103,010	65,230	32,305	200,545	57,080	52,370	63,070	172,520

Table 9 – Cost Burden > 30%

Data Source: 2007-2011 CHAS



Housing Cost Burdened Households

Cost Burden >30%

More than half of housing cost burdened renter households are in the 0 - 30 percent of Area Median Income Category. According to the data in this table, more than 370,000 households in Kentucky are housing cost burdened. While the rent or mortgage payment for some housing units may in itself be burdensome, high utility costs add to the problem. Older manufactured housing is less energy efficient and the utility costs are very high.

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**Total**
NUMBER OF HOUSEHOLDS								
Small Related	34,840	9,085	870	44,795	13,645	9,750	6,655	30,050
Large Related	5,890	995	130	7,015	2,405	1,455	1,070	4,930

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	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	9,470	4,060	1,025	14,555	13,970	8,195	4,680	26,845
Other	33,505	7,860	1,005	42,370	11,795	5,940	3,450	21,185
Total need by income	83,705	22,000	3,030	108,735	41,815	25,340	15,855	83,010

Table 10 – Cost Burden > 50%

Data Source: 2007-2011 CHAS

Extreme Housing Cost Burden

Extremely low income renter households comprise 77 percent of all extremely housing cost burdened renter households. More than 80,000 households below 30 percent of area median income pay more than 50 percent of income for housing costs. Comparatively, approximately 50 percent of extremely low income owner households are extremely cost burdened.

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	4,675	3,215	3,010	1,175	12,075	1,365	1,205	1,735	900	5,205
Multiple, unrelated family households	360	485	530	230	1,605	170	450	690	530	1,840
Other, non-family households	160	95	335	155	745	0	40	50	0	90
Total need by income	5,195	3,795	3,875	1,560	14,425	1,535	1,695	2,475	1,430	7,135

Table 11 – Crowding Information – 1/2

Data Source: 2007-2011 CHAS

Crowding

Low income renter households are twice a likely to be living in overcrowded housing as compared to low income homeowners. While overcrowding does not affect the sheer number of households as cost-burden does, those in the lowest incomes are most likely to be living in overcrowded housing. Overcrowding is a risk factor for homelessness.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

Single-person households in Kentucky, while not the highest number of households, comprises a segment of the population with affordability challenges. Data indicate that 193,095 owner households (22.08%) and 119,426 renter households (36.21%) are single-person households. Overall, single-person households comprise nearly 28 percent of total households in Kentucky.

According to data from the National Low Income Housing Coalition, a household must earn $2,199 monthly or $26,393 annually to afford the Fair Market Rent (FMR) for a two-bedroom apartment. This translates to a wage of $12.69 per hour, assuming a 40-hour work week, working 52 weeks per year. A single, minimum wage worker household in Kentucky cannot afford this level of rent without being housing cost burdened. In order to afford this rent, a minimum wage worker household must include 1.8 full-time employed persons. The average wage for a renter in Kentucky is $11.00 per hour. A renter must work 46 hours per week, 52 weeks per year in order to afford the FMR for a two-bedroom apartment, or the household must include 1.2 minimum wage workers to make the rent affordable.

In Kentucky, of 120 counties, only 16 counties have a mean hourly renter wage sufficient to afford a 2-bedroom unit at FMR working 40 hours a week. In the remaining counties of Kentucky, the mean hourly renter wage is insufficient to afford the FMR for a 2-bedroom rental unit on one full-time employed income.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

On any given night, there are an estimated 354 victims of domestic violence, dating violence, sexual assault, and stalking homeless in 118 of Kentucky's 120 counties (Balance of State Continuum of Care). Of these, 129 households include children and 217 do not include children, and 2 are households

comprised only of children under the age of 18. The Kentucky Coalition Against Domestic Violence has reported sheltering 3,502 persons during its 2012/2013 fiscal year.

During the Balance of State CoC's point-in-time homeless count in 2014, homeless households reported a total of 1,329 instances of disability. Those those, 207 were reported in households with children (112 households) and 1,122 were reported in households without children (692 households).

It is also estimated that 600 persons with severe mental illness currently residing in personal care homes or other facilities are in immediate need of permanent housing with supportive services.

What are the most common housing problems?

Housing cost burden and extreme housing cost burden continue to be the biggest housing problem for both renters and owners. Twenty-three percent of all households in Kentucky are housing cost-burdened (187,925 renters/193,230 owners). When calculating housing cost burden, the cost of utilities is included. Utility costs in housing that is not energy efficient are very high and unaffordable for households of low income. Housing that is substandard, aging, and the high percentage of older manufactured housing in the state also contribue to the high energy cost burden, which contributes to housing cost burden.

Are any populations/household types more affected than others by these problems?

Of renters at 0-30% of AMI, 77 percent are paying more than 50 percent of their income for housing costs. Twenty percent of renters at 30-50 percent of AMI are paying more than 50 percent of their income for housing costs. Likewise, 48 percent of homeowners with incomes below 30 percent of AMI are paying more than 50 percent of their income for housing costs. Forty-one percent of owners between 50 and 80 percent AMI are paying more than 30 percent of their income for housing costs.

Supplemental Security Income (SSI) monthly payments in Kentucky are sufficient to afford monthly rent of $216, leaving a $444 per month gap for a person whose sole source of income is SSI to afford the median rent for a two-bedroom housing unit in Kentucky (NLIHC data).

While over-crowding and housing that lacks complete plumbing or kitchen facilities are a smaller housing problem overall, households below 30 percent of AMI are most likely to experience these problems.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the

needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Precariously housed households in Kentucky were counted in summer of 2014. The count revealed 757 households containing 1,856 total persons. The average household size of 3.23 is higher than the average household size in Kentucky, revealing that overcrowded households are at higher risk of homelessness.

- 65 percent of the heads of household had less than a high school education or a high school diploma/GED
- 30 percent of households were doubled up due to economic conditions
- Substandard living conditions were present in some households - 21 lacked water; 21 lacked electricity; 28 lacked heat
- 64 percent had a source of income, most less than $1,000 per month
- 44 percent had access to public transportation
- 49 percent had access to employment

Agencies that assist formerly homeless families and those who are receiving rapid re-housing assistance report that those that they are assisting face numerous barriers to regaining and maintaining housing including:

- Lack of education and skills for employment in jobs that provide a living wage - if a client is employed, the wages are very low
- Lack of transportation and childcare needed for employment
- Lack of credit or bad credit, affecting the ability to qualify for housing and obtaining utilities
- Need for case management
- Lack of financial literacy
- Need for job development
- Unable to qualify for housing due to criminal convictions and/or previous evictions

In general, as with other low income populations, high housing costs and low incomes prevent individuals and families in these categories from obtaining and maintaining housing. In addition, many of these families are in rural areas that do not offer the level of resources as those available in metropolitan areas. High on the list is reliable transportation. There is no public transportation in rural areas. Child care, if it is available, does not allow for those working evening or night shifts. Rapid rehousing assistance is available for a limited amount of time. At the end of assistance, many families and individuals face re-entering the homeless population if they are unable to obtain a housing voucher funded through Section 8 or HOME TBRA or other similar assistance programs.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Methodology and descriptions are included above.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

As seen through previous data collection on precariously housed individuals in Kentucky, there has been a linkage between instability and increased risk of homelessness in households that have the presence of one or more of the following conditions:

1. Home does not have running water
2. Home does not have electricity or has inadequate or unsafe electrical service
3. Home does not have a safe or adequate source of heat.

Kentucky's precariously housed annual survey also indicates that overcrowding is a problem in these households. Precariously housed families in Kentucky are, on average, 1.5 persons larger than the national average. Additional indicators of households who are at risk of homelessness are those who lack transportation and employment in their area, and those who are doubled up due to economic conditions. An additional factor that contributes to households who are precariously housed and at higher risk of homelessness is lower educational levels.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Per HUD guidance, disproportionately greater need exists when the percentage of persons ina category of need who are members of a particular racial or ethnic group, is at least 10 percentage points higher than the percentage of persons in a category as a whole. The four housing problems referenced in each table are defined below. In addition, below each table, a map displays the highest concentrations of each income group.

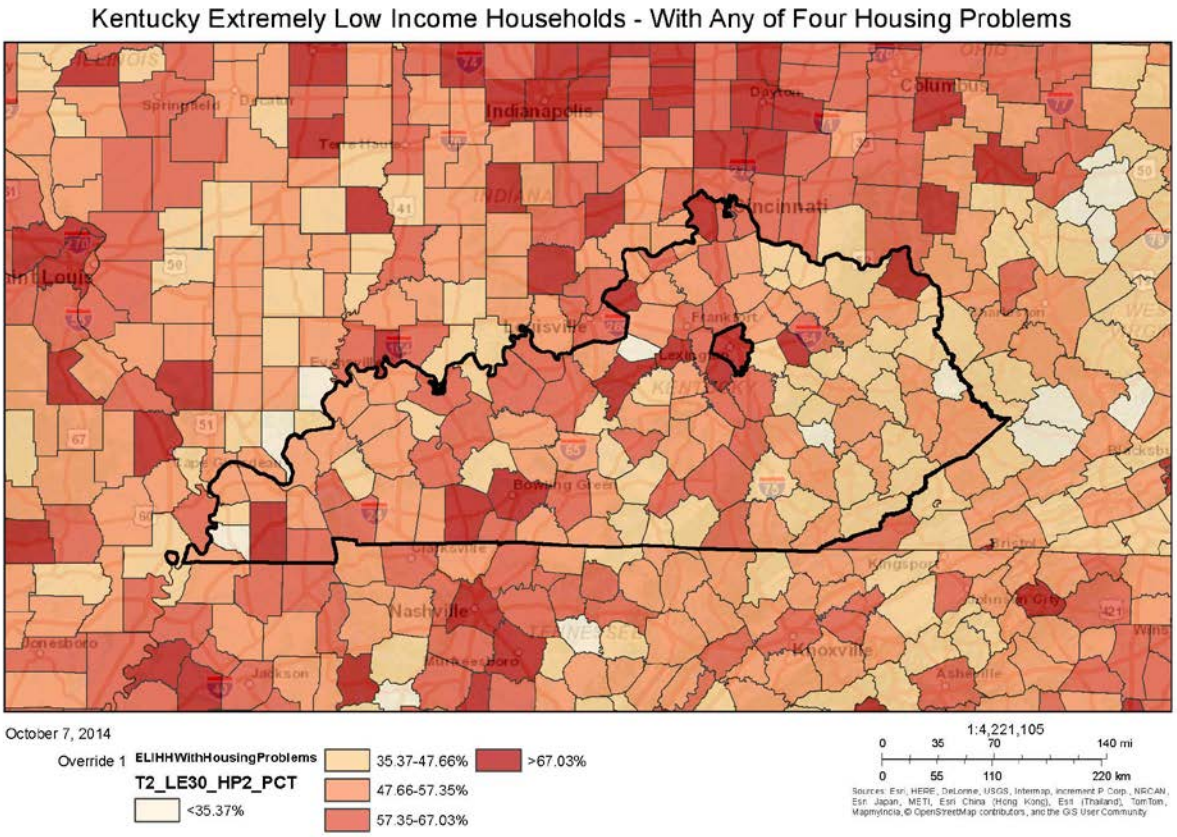
0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	169,884	48,945	18,382
White	137,651	42,396	14,807
Black / African American	24,169	5,262	2,620
Asian	1,311	189	346
American Indian, Alaska Native	529	120	105
Pacific Islander	120	20	0
Hispanic	3,791	324	357

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%



ELI Households w/Housing Problems
Extremely Low-Income HH Disproportionate Impact

Pacific Islander and Hispanic extremely low income households are disproportionately impacted by the presence of one or more of the four housing problems.

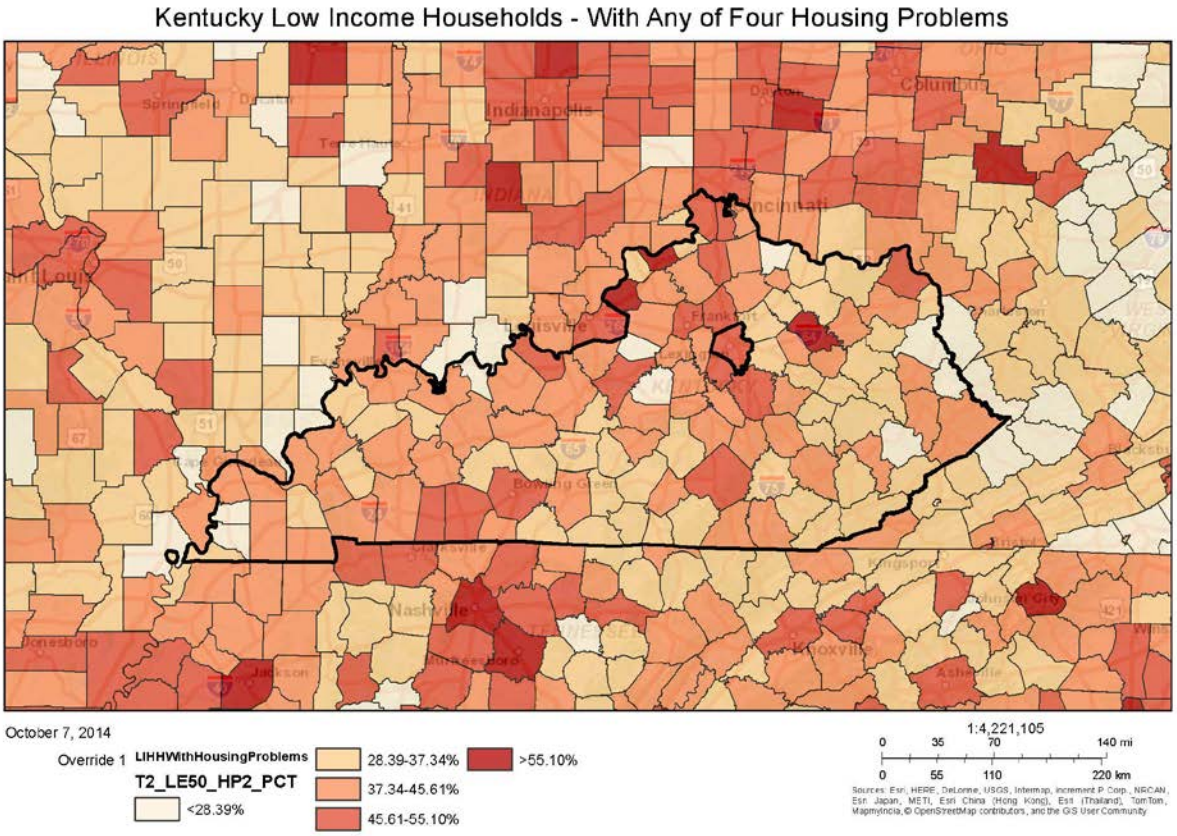
30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	117,179	92,533	0
White	98,586	83,190	0
Black / African American	12,871	6,452	0
Asian	970	349	0
American Indian, Alaska Native	255	183	0
Pacific Islander	70	170	0
Hispanic	2,988	1,491	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%



LI Households w/Housing Problems
Low Income Households Disproportionate Impact

Black/African American, Asian, and Hispanic low-income households are disproportionately affected by the presence of one or more of the four housing problems.

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	93,943	197,575	0

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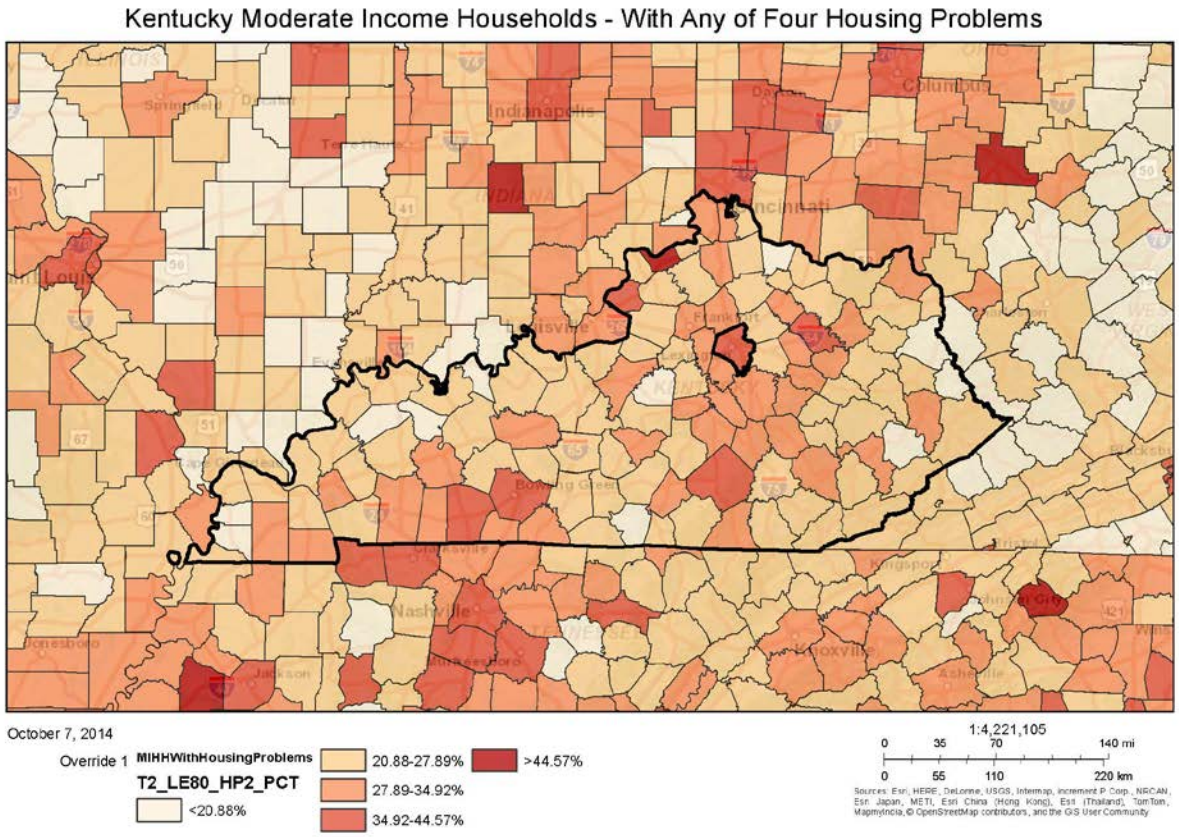
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	80,266	175,238	0
Black / African American	9,301	16,202	0
Asian	635	741	0
American Indian, Alaska Native	425	409	0
Pacific Islander	15	78	0
Hispanic	2,369	3,357	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%



MI Households w/Housing Problems

Middle Income HH Disproportionate Impact

Asian, American Indian/Alaska Native, and Hispanic households at 50 to 80 percent of area median income are disproportionately impacted by the presence of one or more of the four housing problems.

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	30,618	140,119	0
White	27,206	126,122	0
Black / African American	2,233	9,411	0
Asian	566	1,010	0
American Indian, Alaska Native	55	165	0
Pacific Islander	15	93	0
Hispanic	347	2,544	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Higher Income Disproportionate Impact

Asian households in the 80 to 100 percent of area median income category are disproportionately impacted by the presence of one or more of the four housing problems.

Discussion

Different racial/ethnic groups are affected disproportionately by the presence of one or more of the four housing problems, depending on the income level analyzed. In most instances, it appears that Hispanic households are disproportionately impacted regardless of the income level, except at the highest income level.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

In this portion of the needs assessment, three of the housing problems studied remain the same as the previous section. The fourth housing problem in this section is severe housing cost burden (over 50%) rather than housing cost burden (over 30%).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	131,350	87,536	18,382
White	105,412	74,746	14,807
Black / African American	19,272	10,137	2,620
Asian	1,115	384	346
American Indian, Alaska Native	371	271	105
Pacific Islander	120	20	0
Hispanic	3,394	720	357

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

ELI Severe Housing Problems

Pacific Islander and Hispanic extremely low-income households are disproportionately impacted by the presence of one or more of the four housing problems.

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	48,350	161,314	0
White	40,596	141,070	0
Black / African American	5,153	14,183	0
Asian	430	893	0
American Indian, Alaska Native	113	320	0
Pacific Islander	50	190	0
Hispanic	1,227	3,232	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

LI Housing Severe Housing Problems

Asian households in the low-income category are disporportionately impacted by the presence of one or more of the four housing problems.

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	25,281	266,119	0
White	21,375	233,967	0
Black / African American	2,221	23,264	0
Asian	207	1,174	0
American Indian, Alaska Native	101	733	0
Pacific Islander	15	78	0
Hispanic	1,147	4,561	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Middle Income Housing Needs

Hispanic households in the 50 to 80 percent of area median income category are disproportionately impacted by the presence of one or more of the four housing problems.

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,583	163,124	0
White	6,507	146,756	0
Black / African American	654	10,984	0
Asian	139	1,432	0
American Indian, Alaska Native	0	221	0
Pacific Islander	15	93	0
Hispanic	222	2,670	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Higher Income Housing Problems

Pacific Islander households with incomes at 80 to 100 percent of area median income are disporportionately impacted by the presence of one or more of the housing problems.

Discussion

Asian, Pacific Islander, and Hispanic households appear to be more disproportionately impacted by the presence of one or more of the four housing problems, when one of the problems is severe housing cost burden.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This portion of the analysis is limited to a single housing problem - housing cost burden. Housing cost burden is present when the household pays more than 30 percent of household income for housing costs. Disproportionate impact exists when a particular racial or ethnic group who suffer from housing cost burden is at least 10 percentage points higher than the percentage of persons in the category as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,223,945	240,167	191,698	19,214
White	1,116,583	206,486	158,041	15,532
Black / African American	70,774	23,753	24,794	2,699
Asian	9,669	2,321	1,710	346
American Indian, Alaska Native	1,831	747	526	109
Pacific Islander	560	90	135	0
Hispanic	16,574	4,214	4,141	357

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion

Analysis of the impact of housing cost burden and severe housing cost burden by racial and ethnic group indicates that no group is disproportionately impacted. However, Black/African American and American Indian/Alaska Native households have a higher incidence of housing cost burden overall. Black/African American households have a higher incidence of severe housing cost burden, although it is not at a high enough level to be considered a disproportionate impact.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As is noted with each of the previous tables, overall, no racial or ethnic group is disproportionately impacted by housing cost burden or severe housing cost burden. However, Black/African American households have a higher incidence of housing cost burden although not to the level of disproportionate impact.

If they have needs not identified above, what are those needs?

None.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

This Consolidated Plan is, for the most part, a statewide plan and does not analyze data in smaller geographies, including neighborhoods. While the highest concentrations of minority populations in Kentucky are generally in the larger urban entitlement jurisdictions, there are some counties in Kentucky with concentrations of minorities (twice the overall state rate for the population). Fulton and Christian counties in far western Kentucky have a higher concentration of Black/African Americans as compared to the remainder of the state's jurisdiction for the programs under this Consolidated Plan. Butler County has the highest concentration of American Indian/Alaskan Native population in the state's jurisdiction, and Warren County has the highest concentration of the Asian population in the non-entitlement jurisdiction covered by this plan.

NA-35 Public Housing – (Optional)

Introduction

This section is not applicable to Kentucky's state Consolidated Plan.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	128	20,397	28,558	800	26,798	181	8	454

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	86	33	5	28	0	0
# of Elderly Program Participants (>62)	0	7	5,201	4,360	186	4,010	11	0

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	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Disabled Families	0	27	5,374	9,296	152	8,570	82	3
# of Families requesting accessibility features	0	128	20,397	28,558	800	26,798	181	8
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

	Program Type								
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	52	13,241	18,804	665	17,452	79	6	408
Black/African American	0	74	6,990	9,456	133	9,056	99	2	45
Asian	0	0	67	44	1	41	0	0	0
American Indian/Alaska Native	0	2	36	188	1	184	2	0	1
Pacific Islander	0	0	62	60	0	59	1	0	0
Other	0	0	1	6	0	6	0	0	0

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*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	**Certificate**	**Mod-Rehab**	**Public Housing**	**Vouchers**					
				Total	**Project - based**	**Tenant - based**	**Special Purpose Voucher**		
							Veterans Affairs Supportive Housing	**Family Unification Program**	**Disabled ***
Hispanic	0	0	215	313	7	299	0	0	2
Not Hispanic	0	128	20,181	28,239	793	26,493	181	8	452
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

OMB Control No: 2506-0117 (exp. 07/31/2015)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Not Applicable

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Not Applicable

How do these needs compare to the housing needs of the population at large

Not Applicable

Discussion:

Not Applicable

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

The homeless needs assessment information in this section encompasses the Balance of State Continuum of Care, which includes 118 of Kentucky's 120 counties. Metro Louisville and Lexington/Fayette data is not included, as these two jurisdictions have individual Continuum of Care organizations separate from the Balance of State.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	282	680	2,185	1,271	1,367	130
Persons in Households with Only Children	0	13	200	84	86	35
Persons in Households with Only Adults	388	866	4,817	3,156	3,278	65
Chronically Homeless Individuals	104	137	0	0	0	0
Chronically Homeless Families	10	8	0	0	0	0
Veterans	12	167	448	372	0	0
Unaccompanied Child	0	13	220	84	86	35
Persons with HIV	4	2	55	34	15	136

Table 26 - Homeless Needs Assessment

Data Source Comments: Kentucky HMIS

OMB Control No: 2506-0117 (exp. 07/31/2015)

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	241	252	1,120	310	336	174
Persons in Households with Only Children	0	1	20	1	1	14
Persons in Households with Only Adults	171	238	1,573	833	867	56
Chronically Homeless Individuals	42	22	0	0	0	0
Chronically Homeless Families	7	2	0	0	0	0
Veterans	0	18	44	37	0	0
Unaccompanied Youth	0	1	20	1	1	14
Persons with HIV	4	1	33	20	9	121

Table 27 - Homeless Needs Assessment

Data Source Comments: Kentucky HMIS

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

OMB Control No: 2506-0117 (exp. 07/31/2015)

The rural homeless population in the Kentucky Balance of State is difficult to count due to the lack of service providers in the rural areas of the state. Additionally, homeless service providers that do serve the rural areas report that many of those homeless are doubled up with friends or family members or are precariously housed and thus not able to be counted as being literally homeless. During the Rural Homeless Needs Assessment, KHC estimated that 310 families and an additional 833 individuals per year will become homeless in the rural areas of the state. From the 2014 homeless point-in-time count, the number of homeless in rural areas reported to be sheltered versus unsheltered are similar (412 unsheltered and 491 sheltered). The numbers also reflect that more than 61 percent of the total unsheltered population (670) were located in rural areas.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not Applicable.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	1,283	535
Black or African American	260	124
Asian	2	5
American Indian or Alaska Native	13	6
Pacific Islander	1	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	52	54
Not Hispanic	1,507	616

Data Source Comments: Data is from the Balance of State 2014 Homeless Point In Time Count. Please note that persons reporting more than one race were added to the Black or African American category in the above table to allow for the data to be reported.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The Kentucky Balance of State count of homeless families indicates an overall continued decline in homelessness. The types of families seeking housing assistance are predominately single-parent households, victims of domestic violence, or families with at least one person having a disability that prevents the family from being able to secure and maintain stable housing. From the Homeless Needs Assessment, an estimated 1,271 persons in families per year will seek housing assistance through homeless service providers across the state of Kentucky, outside Fayette and Jefferson counties. During the 2014 K-Count (Kentucky Point In Time Count), less than half of the total homeless were members of households with families.

Kentucky homeless service providers are reportedly seeing fewer families of veterans seeking housing assistance due to the increase in Veterans Administration programs that serve the veterans in need such as VASH and SSFV. Based on the numbers reported from the K-Count (Kentucky's homeless point-in-time count), it is estimated that there are six families (households) of veterans in need of housing assistance including 20 persons. However, this is a single point-in-time count. Although it is estimated that the number of homeless veterans will continue to decrease, the Kentucky Department of Veterans Affairs estimates that several hundred veterans are homeless throughout the year statewide. New VASH and SSVF programs being funded in 2014 across the Balance of State have had a positive impact on assisting this population.

The Kentucky Department of Veterans Affairs is active in the state's Continuum of Care program, and is focused on assisting homeless and precariously housed veterans in an effort to alleviate and prevent

homelessness. Numerous transitional housing, treatment and counseling programs, and the Homeless Veterans Trust Fund have provided housing and assistance to several hundred veterans in the past year. These programs are expected to continue to serve this population.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The predominate number of persons experiencing homelessness in the Kentucky Balance of State are white, non-Hispanic. During the 2014 K-Count (Kentucky Point In Time Count), more than 81 percent of the total homeless population was recorded as being white. Twelve percent were recorded to be Black/African American which comprised the largest percentage of any race, other than white. The Hispanic population in the Balance of State during the 2014 K-Count represented 4.75 percent of the total homeless. Homeless service providers report that more Hispanics are considered to be precariously housed and living with friends or relatives and aren't considered literally homeless per HUD's definition and aren't allowed to be counted as homeless.

Although Black/African Americans comprise 8.8 percent of the state's population, they comprise 12 percent of the homeless population at last count, indicating that there is a disproportionate number of Black/AfricanAmericans among the homeless population when compared to the population as a whole. Likewise, the Hispanic population represented 4.75 percent of the homeless population during the last point-in-time count, but represent less than three percent of the population as a whole, indicating a higher rate of homelessness when compared to the population as a whole.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The number of homeless overall continues to decline across Kentucky. A positive impact of homeless program activities is evident in the fact that the number of sheltered persons were more than double the number of unsheltered during the 2014 K-Count (Kentucky Point In Time Count). From a total of 2,229 homeless persons counted, a total of 962 of those were members of families with 680 (70 percent) reported being sheltered and only 282 being unsheltered. For individuals experiencing homelessness, more than 69 percent were sheltered of the 1,254 reported. In addition to the shelters and transitional housing programs created through the CoC process, more privately-funded faith-based group-style programs are emerging across the state to help address the needs of the unsheltered, especially for those individuals with substance abuse issues. However, some areas of the state are still in need of outreach and more shelters to address the local need. The rural areas of the state still face obstacles in helping the homeless get transportation to available programs and also have a need for more affordable housing units that can be utilized through rapid rehousing programs. The use of rapid rehousing programs through both the American Recovery and Reinvestement Act (ARRA) programs and now the Emergency Solutions grant has provided quick housing opportunities to many homeless that previously would have still be on the streets or doubled-up with family or friends.

Discussion:

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

KHC currently administers both formula funds and competitive funds under the Housing Opportunities for Persons with AIDS (HOPWA) program. This program assists households affected by HIV/AIDS. KHC also administers funding from the state Cabinet for Health and Family Services to assist youth aging out of foster care and those in the juvenile justice system as well as the Olmstead population (persons with serious mental illness). While KHC no longer administers the housing program under the Kentucky Transitions Program (Money Follows the Person), this population is one of the populations expected to be assisted under KHC's new Section 811 Project-Based Rental Assistance Program. This new program will become active during the term of this Consolidated Plan.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	2,786
Area incidence of AIDS	109
Rate per population	4
Number of new cases prior year (3 years of data)	284
Rate per population (3 years of data)	2
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	5,829
Area Prevalence (PLWH per population)	196
Number of new HIV cases reported last year	0

Table 28 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	339
Short-term Rent, Mortgage, and Utility	953
Facility Based Housing (Permanent, short-term or transitional)	581

Table 29 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

The HOPWA program provides assistance to persons who are HIV-positive. These individuals have extremely high prescription and medical costs and often must choose between paying for medication or paying for housing. KHC is the non-entitlement, state grantee whose service area includes most counties in Kentucky. Some larger metro areas in the state receive a direct allocation. The majority of the counties served by KHC's allocation are rural.

An additional special needs population in Kentucky are those persons with severe persistent mental illness and other disabilities who are currently residing in nursing homes or personal care homes who could live independently in their communities if affordable housing and appropriate supportive services are available to them (Olmstead Population). Currently the Olmstead Population consists of approximately 600 persons living in personal care homes.

The Chafee population is comprised of youth aging out of foster care and those in the juvenile justice system. This population is eligible for temporary housing assistance and supportive services that assist them in transitioning from foster care to self-sufficiency.

Non-elderly disabled persons living in nursing homes or other similar facilities may be eligible for transitioning to independent, community-based living with Medicaid services. The Kentucky Transitions program is the state's Money Follows the Person program and is administered by the Division of Medicaid services at the Cabinet for Health and Family Services. The state's goal is to transition several hundred persons to independent living.

What are the housing and supportive service needs of these populations and how are these needs determined?

The majority of HOPWA clients face a high risk of homelessness due to having to choose between medical care expenses and housing costs. Through HOPWA funding they are provided stable housing and supportive services that link them to nutritional services, support groups, transportation to life-saving medical appointments, and mental health services. A comprehensive assessment is provided for each client to assess housing and service needs. Often times, clients are unable to work due to their illness which drastically reduces their income to stay in safe, decent, affordable housing.

The Olmstead Housing Initiative (OHI) is a collaboration between KHC and the Kentucky Cabinet for Health and Family Services that targets individuals with serious mental illness living in personal care homes. OHI provides assistance with moving expenses, security deposits, utility deposits, basic furniture, and provides an ongoing rental subsidy. Supportive services are provided by regional community mental health centers. The housing component of OHI is administered by KHC. The Cabinet for Health and Family Services collaborates with KHC staff on the housing and service needs of the targeted population and coordinates the service delivery system across the state.

The Chafee population requires temporary housing assistance, household set-up assistance, and case management to allow them to transition successfully from foster care/juvenile justice system care to self-sufficiency.

The Kentucky Transitions population requires housing assistance for persons of extremely low income, as most of this population receives SSI. A menu of Medicaid services are also available.

Case managers determine the housing and supportive service needs of all of these populations.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

This Consolidated Plan covers areas of the state that do not have a local Consolidated Plan. Most metropolitan statistical areas in Kentucky are covered under other plans. Statewide data from the HIV/AIDS Surveillance Report provided by the Kentucky Cabinet for Health and Family Services indicates 8,904 persons are living with HIV in Kentucky as of June 2013. Approximately one-third of this population is in KHC's Consolidated Plan service area. The number of persons in this population have remained relatively stable for several years. However, Kentucky and surrounding states are currently experiencing an increase in intraveneous drug use - especially Heroin. It is possible that the number of persons affected by HIV/AIDS in Kentucky will rise over the next few years.

KHC serves this population in primarily rural areas of the state. A majority of these clients require transportation to medical appointments that are often two or more hours away.

Discussion:

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

CDBG funds are used to improve quality of life through funding community projects requested by individual communities to enhance community pride and to perpetuate local identity. In particular, DLG awards grants for projects that enable local communities to provide services that they have determined are important but generally cannot afford, and foster a revitalization of community structure to help communities help themsleves, especially for persons of low and moderate income. The community projects program provides funds for community development projects that address human service needs, such as senior centers, crisis centers, and facilities that provide services to low-income persons. The program has infused a large amount of funds into buildings for senior/community centers, health departments, fire stations, and facilities for handicapped persons.

How were these needs determined?

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 present projects for funding that are ready to proceed. 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.

DLG undertook a survey to determine needs for all types of Public Facility projects, whether funded with CDBG funds or other sources of funding. The survey results indicated that approximately 50 percent of respondents listed park and recreation facilities as their first priority. DLG does not fund these types of projects with CDBG funds. Communities interested in these types of activities are directed to the Land and Water Conservation Fund (LWCF) and/or the Rails to Trails (RTP) programs, both of which are administered by DLG with other sources of funding. CDBG funds for public facilities are generally used for senior citizen centers, health departments, libraries, food banks, and other community capital improvement projects.

Describe the jurisdiction's need for Public Improvements:

CDBG funds are used to improve quality of life through funding public improvements requested by individual communities to enhance community pride and to address health and safety needs. In particular, DLG awards grants for projects that enable local communities to provide services that they

have determined are important but generally cannot afford, and foster a revitalization of community structure to help communities help themselves, especially for persons of low and moderate income. The public improvement program provides funds for water, wastewater, and drainage projects that provide services to low-income persons.

Water Needs - The current Kentucky Water Management Plan estimates that Kentucky has water projects scheduled with a cost of approximately $1.75 billion to address the state's water project needs.

Wastewater Needs - The current Kentucky Water Management Plan estimates that Kentucky has wastewater projects scheduled with a cost of approximately $1.63 billion to address the state's wastewater project needs.

How were these needs determined?

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. 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 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. Applications are compared to the Water Resource Information System and the Kentucky Water Management Council's rankings of need.

DLG undertook a survey to determine all public improvement needs, including those funded with CDBG and other funds. The survey results indicated that 79 percent of respondents listed road and/or sidewalk improvements as their first priority. DLG does not fund these types of projects with CDBG funds as they are best addressed through the Kentucky Transportation Cabinet's sources of funding. The Commonwealth of Kentucky has had a long-term policy of reserving allocated CDBG Public Improvement funds for water, wastewater, and drainage infrastructure projects.

Describe the jurisdiction’s need for Public Services:

At present, DLG public services projects focus on Recovery Kentucky (Transitional Supportive Housing). Data indicate that as many as one-third of homeless adults suffer from mental illness, and as many a one half suffer from some sort of addiction, and many are dually diagnosed with both. Often they have

difficulty finding and keeping employment, basic life skills are underdeveloped and they have complex health issues. The needs of this population are extensive and complex and cannot be solved solely by providing safe and affordable housing. Therefore, DLG, along with KHC, entered into a cooperative initiative with other agencies of the Commonwealth to address this need.

How were these needs determined?

DLG anticipates funding services for existing Recovery Kentucky Centers and new centers scheduled to be constructed.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

In 2012, staff at KHC prepared a comprehensive report on the state of housing in Kentucky utilizing 2010 Census data as well as locally available data. While some of the findings have changed during the past several months – specifically a decrease in the foreclosure and unemployment rates – many of the findings remain constant:

- Kentucky's housing market consists primarily of owner-occupied units (73 percent owner vs. 27 percent rental).
- The average household size has not changed significantly over the past several years, but household composition has changed.
- Non-family households (unrelated persons) and female householders with no husband present have increased, while family households with children under age 18 have decreased.
- Grandparents living in the same household as grandchildren have increased.
- Renter-occupied households have increased and owner-occupied households have decreased.
- Overall, housing units in Kentucky are aging with the median age of housing units at 34 years compared with 27 years in 2000.
- Southeastern and western Kentucky have the highest concentration of pre-1989 housing units.
- Eastern Kentucky continues to have a high concentration of manufactured housing as well as housing using non-energy efficient sources of heat.
- Older non-energy efficient manufactured housing contributes to housing cost burden.
- Affordable rental units are in short supply as compared to the number of low-income and extremely low-income households who need them.
- Approximately 20 percent of affordable rental units fail a Housing Quality Inspection (HQS) with the highest rate of failure in eastern Kentucky.
- Utility costs continue to rise.
- The payment standard for tenant-based rental assistance is higher in many cases than the fair market rent established by HUD, decreasing the number of households that can be served by that program.
- In some counties in Kentucky, nearly three out of four renter households are cost burdened.
- Over the next five years, the state is at-risk of losing nearly 50,000 units of subsidized and affordable rental housing as affordability periods expire.
- Limited statewide data on substandard housing makes it difficult to assess how many homes are in need of repair or replacement; however, the housing stock overall is aging, meaning that newer housing is not replacing older housing. Older housing in general is not as energy-efficient, may contain lead-based paint, and may have deferred maintenance issues, especially when occupied by the lowest income households.

OMB Control No: 2506-0117 (exp. 07/31/2015)

MA-10 Number of Housing Units – 91.310(a)

Introduction

The majority of residential properties in Kentucky are single-unit detached structures. Manufactured homes are included in the category of mobile homes, boat, RV, van, etc. in the data provided. According to data from the Kentucky Manufactured Housing Institute, there are more than 560,000 manufactured homes in Kentucky. The table below may include manufactured homes in the category of 1-unit detached structure if the manufactured housing has been converted to real property. High concentrations of manufactured housing exist in many of the Appalachian counties in eastern Kentucky. Manufactured housing and mobiles homes constitute between 25 and 45 percent of all housing units in some of these counties. A continuing concern is the number of older manufactured homes that are in poor condition and are not energy efficient.

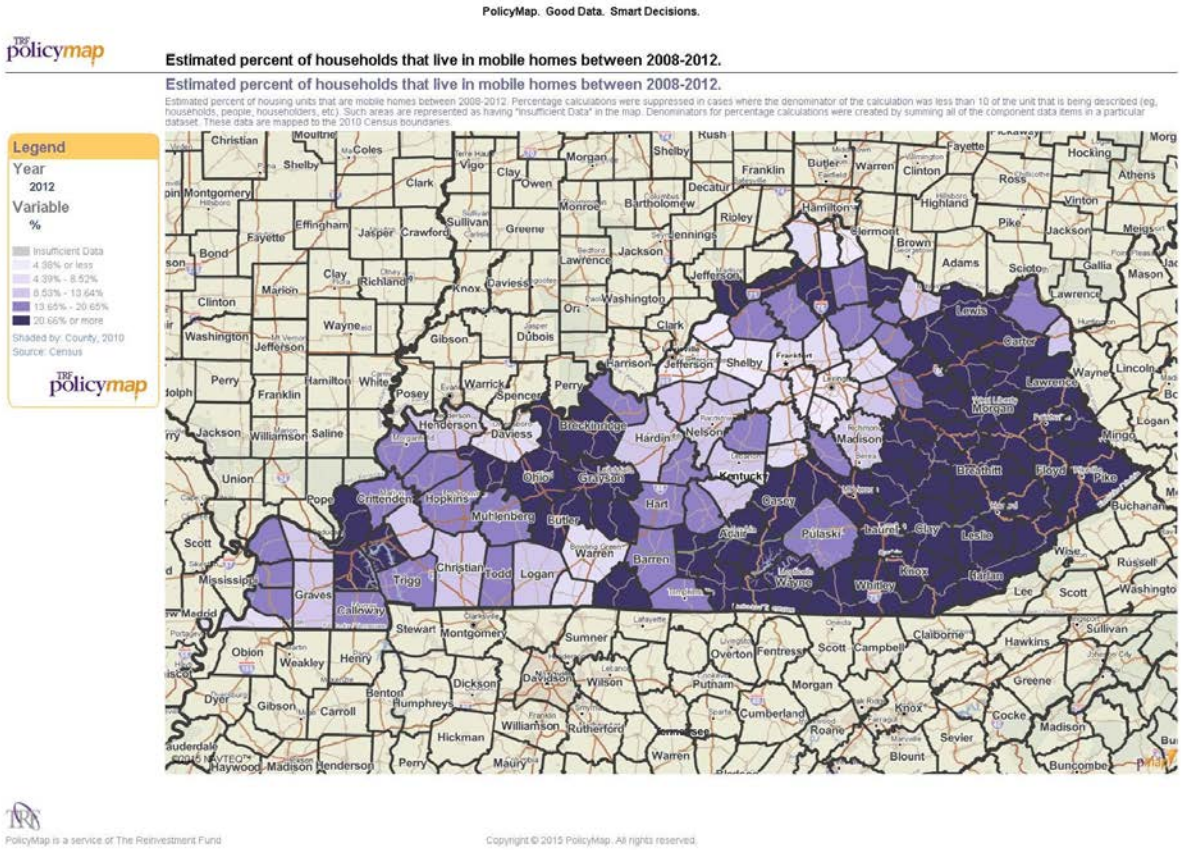
Rental units statewide tend to have fewer bedrooms than owner-occupied housing. Nearly 80 percent of owner housing features at least 3 bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,294,884	67%
1-unit, attached structure	44,233	2%
2-4 units	134,101	7%
5-19 units	150,165	8%
20 or more units	57,567	3%
Mobile Home, boat, RV, van, etc	240,117	12%
Total	***1,921,067***	***100%***

Table 30 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS



Manufactured Housing Concentration

Unit Size by Tenure

	Owners		Renters	
	Number	**%**	**Number**	**%**
No bedroom	2,073	0%	14,482	3%
1 bedroom	19,540	2%	110,624	22%
2 bedrooms	221,337	19%	212,817	42%
3 or more bedrooms	925,273	79%	174,939	34%
Total	***1,168,223***	***100%***	***512,862***	***101%***

Table 31 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Because KHC and DLG serve the needs of Kentucky as a whole (with the exception of local entitlement jurisdictions), specific income levels and types of families served are not targeted in general. Agencies

and local governments who apply for funding from KHC and DLG design programs based on local need. Some programs provide additional scoring points for serving certain populations or income levels.

There are more than 112,000 subsidized rental units in Kentucky that receive assistance directly from the federal government and have received assistance from KHC, Rural Development, and/or other funding sources. Of this number, approximately 77,000 are located in the state's jurisdiction (with the remaining located in Louisville and Lexington participating jurisdictions).

Statewide, the subsidies include (approximate numbers, with some units receiving more than one type of subsidy):

- 34,000 tenant-based rental vouchers
- 25,000 project-based rental units (HUD and KHC)
- 24,000 public housing units
- 4,300 HUD 202 elderly units
- 3,500 HUD 236 BMIR units
- 6,000 HOME units
- 350 HUD Section 811 units for the disabled
- 22,000 Housing Tax Credit units
- 12,000 USDA Rural Development units
- 1,500 TARP and ARRA-funded units
- 2,500 state Affordable Housing Trust Fund units
- 4,000 units with other federal and state subsidies

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Almost 50,000 affordable rental units in Kentucky are at risk of being lost by the year 2020 due to the expiration of long-term subsidies and use restrictions. Aging properties are in need of repair and renovation and increases in operating costs are outpacing rents. Of the 49,380 units identified as at-risk, half are at risk due to expiration of project-based Section 8 contracts. Low-income housing tax credit, HOME, and other similarly financed properties comprise 13,530 at-risk units. USDA Rural Development's portfolio of at-risk units in Kentucky numbers 11,440 housing units.

At-risk properties feature one or more of the following:

- Chronic high vacancy
- Poor physical condition
- Risk of losing rent subsidy
- Expiring subsidy
- Exiting owners/partners

- Rents cannot support operations and debt service

Although approximately 14,000 of the total at-risk units are located in the two largest entitlement jurisdictions in Kentucky, many of these units include tax credits that are administered by the state.

The typical preservation project in Kentucky:

- Is located in a rural county
- Has 25-60 rental units
- Could be combined with other properties into a larger-scale portfolio deal
- Needs moderate repairs and renovation costing $25,000 to $45,000 per unit
- Has existing debt to be refinanced or repaid
- Needs $250,000 to $500,000 in soft debt or subsidy - or more if combined with other at-risk properties into one preservation transaction

Does the availability of housing units meet the needs of the population?

Of those renter households that are housing cost burdened (paying greater than 30 percent of their income for housing costs), 52 percent are in the extremely low income category. Data indicate that there is a need for almost 200,000 rental units affordable to low and moderate income households. With affordable rental housing units already in short supply, it is important to preserve existing housing.

Vouchers to assist households with rental costs are in very short supply. KHC, as the public housing agency for 87 of Kentucky's 120 counties, administers more than 5,500 Housing Choice Vouchers. The waiting list contains nearly 10,000 applications, with an expected wait time of two to four years depending on the area of the state in which the applicant wishes to reside. Other PHAs around the state are in similar circumstances.

There remains a shortage of permanent supportive housing to assist persons with serious mental illness and elderly or disabled persons in nursing facilities who could live independently if provided the opportunity to reside in their home communities with supportive services.

Describe the need for specific types of housing:

Rental housing affordable to households at or below 30 percent of area median income are in very short supply. For every three households in this income category in need of housing, there is only one unit available. For those whose incomes are between 30 and 50 percent of area median income, there are only three units available for every four families in need. In eastern Kentucky, persons prefer to be homeowners rather than renters. The challenges in this region of the state include providing homes for

persons with the lowest of incomes (or no income); rehabilitating aging housing (while the vast majority of substandard housing features complete kitchen and bathroom facilities, it is not energy efficient, and may have other structural issues that make the home unsafe or unhealthy for its residents. High concentrations of older manufactured housing are also present in this area of the state.

Persons with serious mental illness who are capable of living independently are currently concentrated in group homes and in-patient facilities. KHC has worked with the state's Cabinet for Health and Family Services to transition this population (the Olmstead population) into permanent housing with the availability of supportive services. There is a current need for at least 600 units of housing to serve the Olmstead population. KHC and the Cabinet currently partner on two programs - one providing rental assistance vouchers and the other providing construction funding for new units. In addition, KHC has been notified of its successful application under the Section 811 Project-Based Voucher program, under which KHC will recieve funding for 150 rental units. Leveraged units under this program are expected to equal those being produced, providing at least 300 new units for this population in the next several years.

KHC and DLG provided the opportunity for partners, local governments, and citizens to provide information on the need for specific types of housing. Details of the survey responses are attached to this plan.

Discussion

MA-15 Cost of Housing – 91.310(a)

Introduction

Data indicate that median home values in Kentucky rose 49 percent in the past 11 years while median rents rose 31 percent. During this same time period, the national housing market as well as Kentucky's housing market has experienced much turmoil. The economic downturn beginning in late 2008 resulted in high levels of unemployment, which translated into high mortgage delinquencies and foreclosures. Poverty rates also rose during this time period. Beginning in 2013 and 2014, foreclosure rates began to level off. However, many of these homes have not yet returned to the market. Their return may affect overall housing values for some time to come. In addition, there continues to be a shortage of housing affordable to persons at the lowest income levels. As discussed in the Needs Assessment, rents and home values have risen at a much higher rate than incomes, increasing the affordability gap.

Energy costs also have a direct impact on the cost of housing. The combination of rising energy costs and aging, less energy-efficient housing have a direct impact on total housing costs. The result is that households in the lowest income brackets continue to pay a large portion of their income toward housing costs, as is seen in the data presented in the Needs Assessment and anecdotal evidence provided by agencies who serve these families.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	79,600	118,700	49%
Median Contract Rent	366	478	31%

Table 32 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	300,634	58.6%
$500-999	191,678	37.4%
$1,000-1,499	15,333	3.0%
$1,500-1,999	2,843	0.6%
$2,000 or more	2,374	0.5%
Total	***512,862***	***100.0%***

Table 33 - Rent Paid

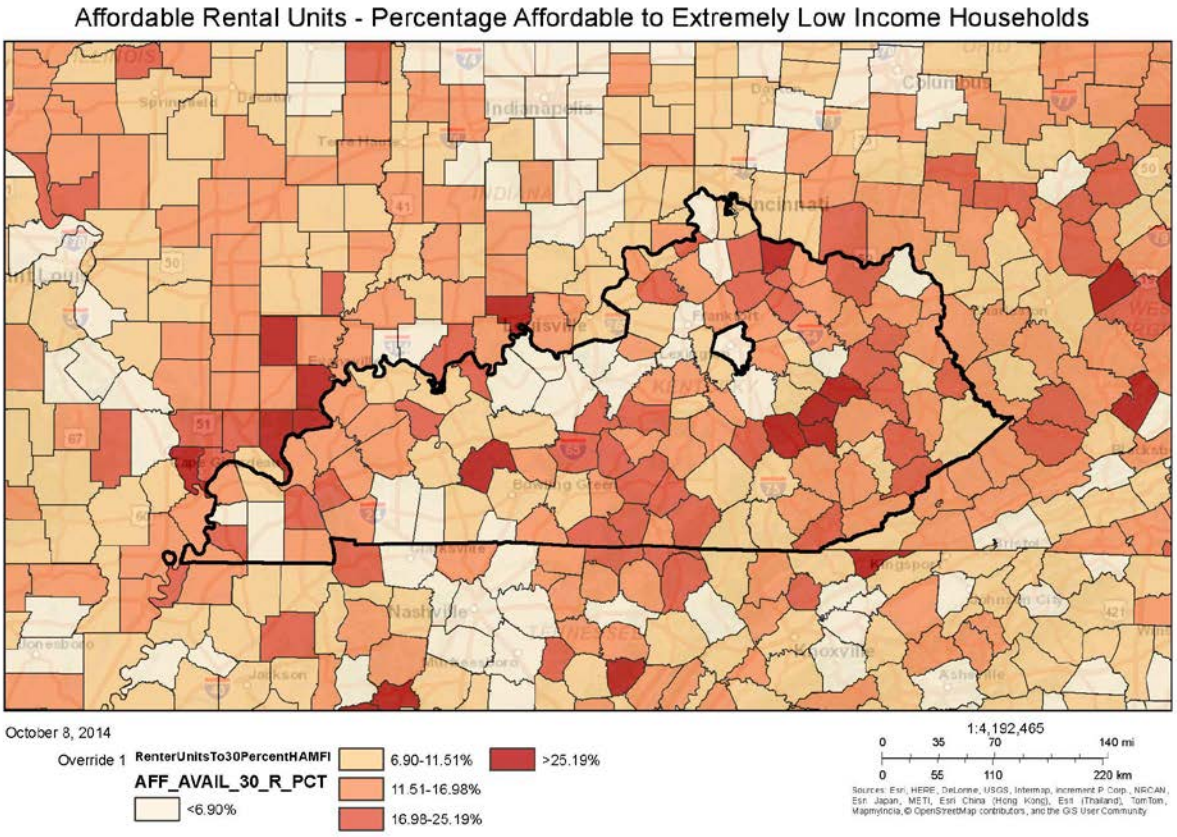
Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	56,025	No Data
50% HAMFI	188,465	122,665
80% HAMFI	372,005	319,090
100% HAMFI	No Data	449,590
Total	***616,495***	***891,345***

Table 34 – Housing Affordability

Data Source: 2007-2011 CHAS



Rental Units Affordable to ELI HH

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent					
High HOME Rent					
Low HOME Rent					

Table 35 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Fair Market Rent Data

Source: National Low Income Housing Coalition Out Of Reach 2014. Note that HOME rents are established in smaller geographies than statewide, therefore, this data is not applicable.

Is there sufficient housing for households at all income levels?

The table below includes data on housing availability at each income level:

Data indicate that more than 200,000 renters are paying greater than 30 percent of income for housing costs. In the higher income categories above, it is evident that housing is more available, but may not be affordable. The lowest income levels tend to be renters rather than homeowners. Households at the lowest income level have the greatest problem locating housing that is affordable and does not create a cost burden. For every 100 extremely low income households, there are only 35 affordable housing units and for every 100 very low income households, there are only 76 affordable housing units available. The largest gap in availability of affordable housing is at the lowest income levels.

How is affordability of housing likely to change considering changes to home values and/or rents?

Affordability trends have not seen much change in decades - there will continue to be a gap between available affordable housing units at all lower-income levels. Exacerbating the gap between incomes and rents/homeowner housing costs, is Kentucky's very high poverty rate. The state's poverty rate continues to be higher than the national average, with some Appalachian counties at two or three times the national poverty rate. Affordable rental housing continues to be difficult for lower-income families to obtain. When housing - both rental and owner - that is affordable to families in lower income brackets, the housing may be in poor condition. Energy costs, due to aging and substandard condition, are often times higher than the rent or mortgage payment. Evidence suggests that households in older manufactured homes and in substandard traditionally constructed homes pay exhorbitant amounts for heating the home in the winter months.

In addition, the challenge of producing and maintaining affordable rental housing poses difficulty for developers and agencies who own and manage these properties. Rents are very low, creating cash flow issues as well as issues funding reserves. Nearly 50,000 affordable rental units statewide are at risk of loss over the next five years, decreasing the already slim supply.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME rents and Fair Market Rents are established on a county-by-county basis. There is no statewide HOME or Fair Market Rent. In rural markets with low household incomes, HOME rents often match the Area Median Rent. As such, they are competitive with market rate rental units. However, lowering rents far beyond the established limits makes it difficult for projects to realize sufficient net operating income (NOI). Project-based rent subsidies play an important role in ensuring a project is both affordable to the families who reside there and financially sustainable to those who own and manage the property.

Discussion

MA-20 Condition of Housing – 91.310(a)

Introduction:

The median age of housing in Kentucky has increased over the past 10 to 15 years, indicating that newer housing has not replaced older housing at a very high rate. Newer housing requires less maintenance and is generally more energy efficient. Increasing energy costs contribute to housing cost burden.

Data indicate that the major housing condition facing homeowners and renters is housing cost burden. Renters face more housing condition problems than owners. Forty-one percent of renters experience at least one housing condition as compared to owners at twenty-one percent. The housing condition is most likely to be housing cost burden.

Many housing units may be substandard for reasons other than that they lack complete plumbing or kitchen facilities. Limited census data does not allow for statewide analysis of housing units that may not be included in the substandard category. Agencies who assist families throughout the state report that housing units that have complete bathrooms and kitchens, may not be energy efficient or may have leaking roofs, bad foundations, older furnaces and other mechanicals that aren't energy efficient, among other problems. Families who are issued a rare rental voucher have difficulty locating rental units that pass Housing Quality Standards inspections.

Newer housing units (built since 2000) are more likely to be owner units, and older housing units (built pre-1950) are more likely to be renter units. With older housing, the risk of lead-based paint poisoning in children increases. Housing units built before 1980 are most likely to contain lead-based paint.

Definitions

Standard Condition is defined as: safe and adequate housing, well maintained, structurally sound, without visible deterioration or observable defects.

Substandard Condition but Suitable for Rehabilitation is defined as: dwelling units that do not meet standard conditions but are both financially and structurally feasible for rehabilitation. This does not include units that require only cosmetic work, correction or minor livability problems or maintenance work.

Housing conditions represented in the following table include:

- Lacks complete plumbing facilities
- Lacks complete kitchen facilities
- Overcrowded - with 1.01 - 1.5 people per room
- Housing Cost Burden - paying greater than 30 percent of income for housing costs

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	246,571	21%	208,414	41%
With two selected Conditions	6,711	1%	11,071	2%
With three selected Conditions	1,068	0%	1,108	0%
With four selected Conditions	67	0%	93	0%
No selected Conditions	913,806	78%	292,176	57%
Total	***1,168,223***	***100%***	***512,862***	***100%***

Table 36 - Condition of Units

Data Source: 2007-2011 ACS

Condition of Units note:

Renter units are affected at a higher rate by at least one housing condition than owner units.

Year Unit Built

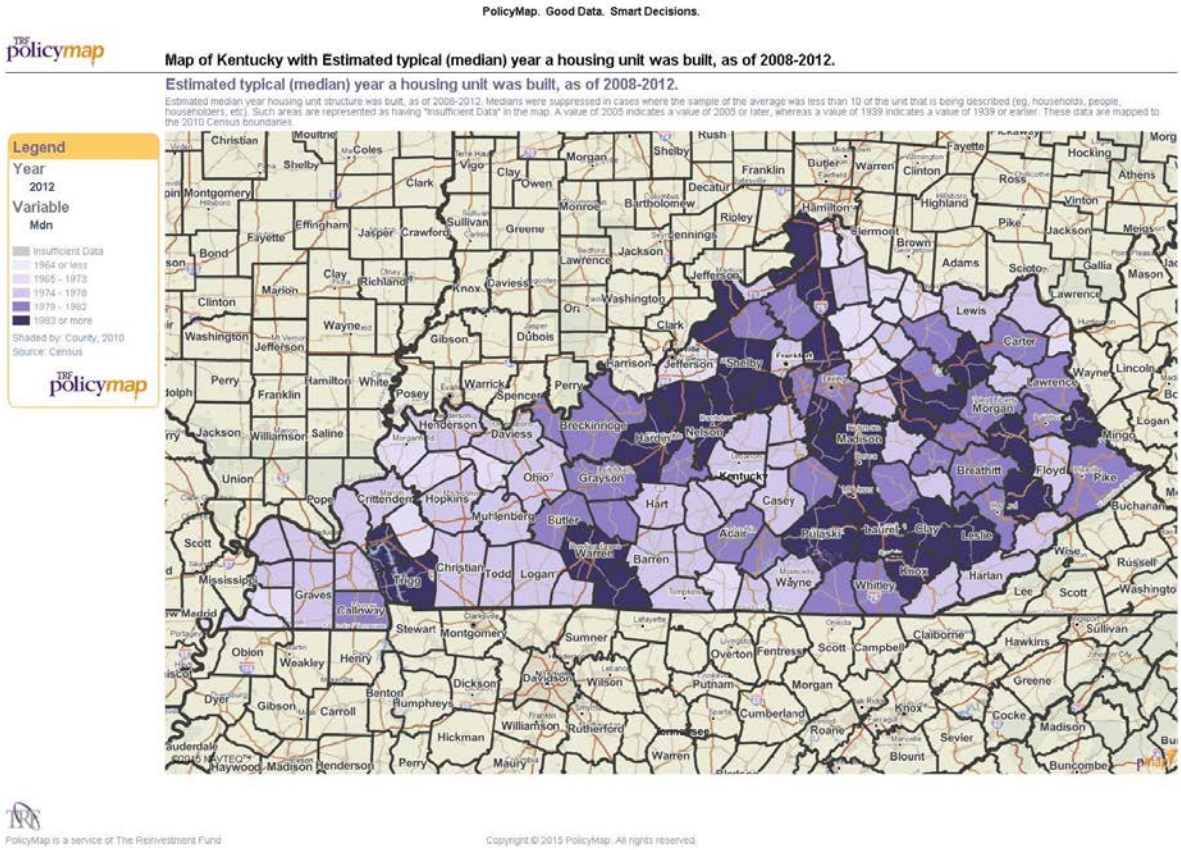
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	179,794	15%	57,497	11%
1980-1999	375,926	32%	153,725	30%
1950-1979	444,380	38%	211,489	41%
Before 1950	168,123	14%	90,151	18%
Total	***1,168,223***	***99%***	***512,862***	***100%***

Table 37 – Year Unit Built

Data Source: 2007-2011 CHAS

Age of Housing Note:

A higher percentage of rental units than owner units are older - 59% of rental units were constructed prior to 1980; 52% of owner units were constructed prior to 1980. These older units pose a higher risk for the presence of lead-based paint. In addition, these units may not be energy efficient or in good physical condition.



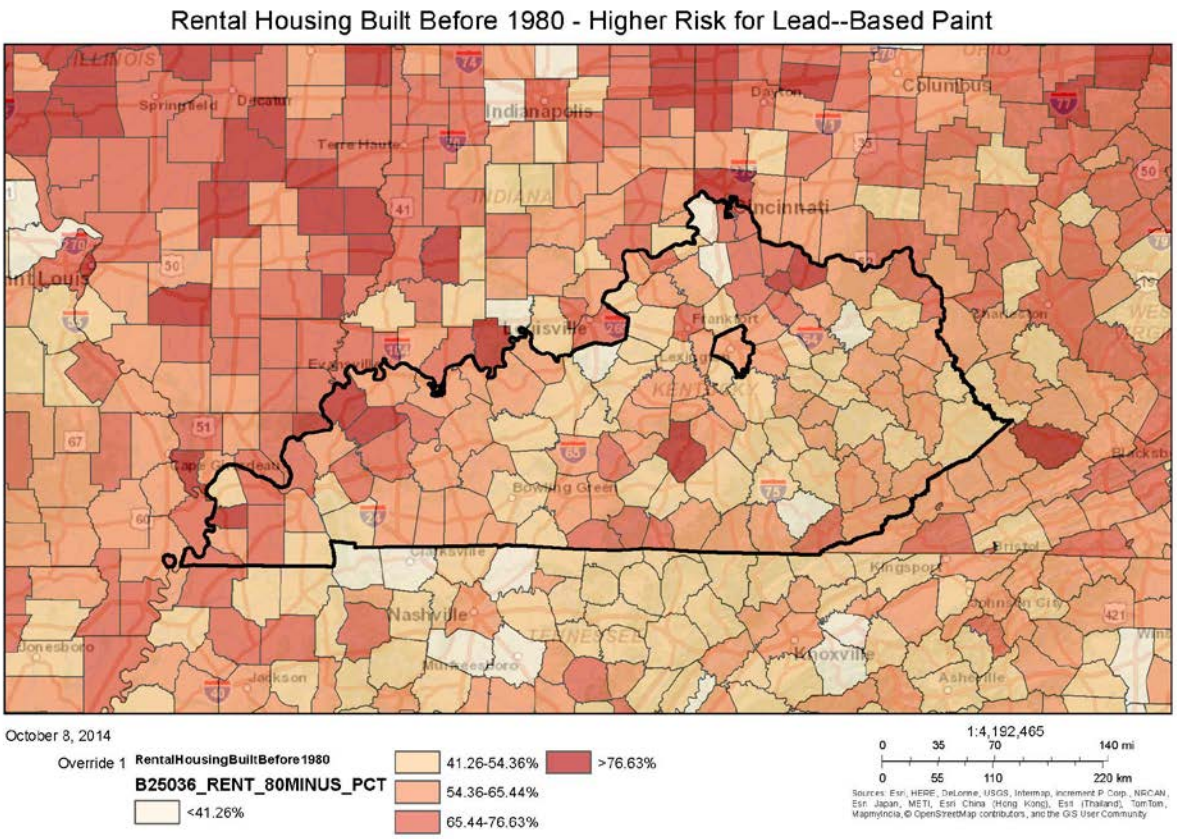
Median Year Housing Built Map

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	612,503	52%	301,640	59%
Housing Units build before 1980 with children present	98,280	8%	47,790	9%

Table 38 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)



Pre-1980 Rental Housing Concentration Map

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 39 - Vacant Units

Data Source: 2005-2009 CHAS

Vacant Unit Note

Vacancy rates range from 4.4 to 44.81 percent. Counties with the highest level of vacancies are Clay, Meniffee, Livingston, Owsley, Robertson, Russell, Edmonson, Cumberland, Marshall, Harlan, Lyon, Breckinridge, Elliott, Clinton, Knott, Grayson, Lewis, Wolfe, Wayne, and Morgan. The lowest vacancy rates are counties located in the bedroom communities between the largest employment centers in Kentucky (also referred to as the “Golden Triangle"). These counties are Franklin, Bullitt, Daviess,

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Woodford, Henry, Scott, Clark, Kenton, Boone, Oldham, Shelby, Washington, Jessamine, Spencer, Lincoln, warren, Nelson, Henderson, and Anderson. The lower vacancy rates may also be attributed to data that suggests that these area economies have rebounded more quickly from the 2009 recession.

Need for Owner and Rental Rehabilitation

The state's housing stock continues to age - new construction has not replaced older housing stock. More than 600,000 owner-occupied housing units and more than 300,000 renter-occupied housing units were constructed before 1980. These units are at higher risk of containing lead-based paint, and without rehabilitation, are nearing the end of their useful lives. The state is in danger of losing nearly 50,000 affordable, subsidized rental units over the next five years. Many of these rental units were originally constructed before 1980 and are in need of rehabilitation in order to preserve the housing stock.

Older housing, especially older manufactured housing, is not energy efficient and is more likely to be in poor overall condition. Rehabilitation or replacement of these owner-occupied units will greatly assist households in the lowest income levels to avoid or reduce housing cost burden. Although rental preservation is a very large need, in rural areas, families prefer to be homeowners rather than renters. Agencies who undertake aquisition/rehabilitation of single family homes in rural areas report that there continues to be a great need for this activity.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Nearly 150,000 housing units currently occupied by families with children were constructed prior to 1980, increasing the risk of high lead blood levels in the younger population. Of all housing units in Kentucky, over 900,000 were constructed before 1980 when lead-based paint was no longer used in residential housing (52 percent of all owner units and 59 percent of all renter units).

Kentucky ‘s Department for Public Health, Childhood Lead Poisoning Prevention Program, has identified target Zip Codes where there is a higher risk of lead-based paint poisoning in children. To identify the geographic risk, the formula considers the percentage of pre-1950 housing, percentage of children with existing elevated blood lead levels, and poverty. Based on this formula, 263 of Kentucky’s 765 zip codes were found to be at high risk. The focus areas include Louisville/Jefferson County, counties in far southwestern and far south eastern Kentucky, as well as northern Kentucky counties on the Ohio River across from Cincinnati, although there are target zip codes in 80 of the state’s 120 counties.

Between 2000 and 2010, the Kentucky Department for Public Health reported an 83 percent decrease in the number of children with elevated levels of lead in their blood. The incidence of elevated blood-lead

level (EBLL) children decreased from six per thousand to one per thousand children. Based on the latest available data (2010), the counties with the highest rate of EBLL children are Owsley, Lee, Letcher, Wolfe, and Campbell.

Discussion:

MA-25 Public and Assisted Housing – (Optional)

Introduction:

KHC is the public housing agency for 87 of Kentucky's 120 counties and does not administer public housing units. As the state administrator of funds under this plan, KHC and DLG are not required to include an assessment of public housing agency units. Therefore, the information in this section is limited.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	2	126	21,988	31,559	891	19,811	1,621	1,083	5,641
# of accessible units			90						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

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 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 ultimate 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.

The *Yes You Can…Own A Home* Program, 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.

The KHC Rental Assistance Department administers the Housing Choice Voucher Program in areas of the state that are not served by a local public housing agency (PHA). KHC continues to be at maximum capacity under its voucher program and has closed the waiting list. KHC aggressively pursues any new voucher funding opportunities.

There are more than 100 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

KHC has established a partnership with local housing authorities that administer Housing Choice Voucher Programs to allow families housed by local housing authorities the knowledge and qualifications to access KHC's single-family loan programs. In addition, KHC has established a homeownership voucher program that allows qualifying families to use their Housing Choice Voucher for homeownership.

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

Information on homeless facilities and services in this section include the Balance of State Continuum of Care, encompassing 118 of Kentucky's 120 counties. The remaining counties fall under the jurisdiction of the Metro Louisville and Lexington/Fayette County Continuums of Care.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	473	38	368	517	0
Households with Only Adults	689	123	237	583	0
Chronically Homeless Households	0	0	0	141	0
Veterans	60	0	78	96	0
Unaccompanied Youth	16	0	0	0	0

Table 41 - Facilities Targeted to Homeless Persons

Data Source Comments:

OMB Control No: 2506-0117 (exp. 07/31/2015)

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

The Balance of State Continuum of Care, encompassing 118 of Kentucky's 120 counties, offers numerous mainstream services targeted to homeless persons. The CoC is divided into six regions. The details of these services, including a county-by-county guide to agencies and the services they provide is located at this link: http://www.kyhousing.org/Specialized-Housing/Documents/Community%20Resource%20Guide.pdf

Available services include, but are not limited to:

- Emergency, Transitional, and Permanent Housing
- Emergency Assistance
- Mental Health, Substance Abuse, Psychiatric, and Developmental and Intellectual Disability assistance
- Housing Case Management
- Health Services
- Legal services
- Food and utility assistance
- Service referrals
- Clothing assistance
- Employment Counseling
- Life skills training
- Educational assessments
- Relocation assistance

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

As of March 2015, Kentucky's Balance of State Continuum of Care region inventory of housing and emergency shelter beds for homeless persons, chronically homeless persons, veterans and their families, and unaccompanied youth included:

- 1,383 emergency shelter beds
- 683 units of transitional housing
- 1,337 units of permanent supportive housing

Approximately 60 emergency shelter beds, 78 transitional housing beds, and 96 permanent supportive housing beds are reserved for veterans. Approximately 141 permanent supportive housing beds are targeted for the chronically homeless.

Kentucky's Domestic Violence programs statewide include 400 emergency shelter beds, 146 transitional housing units, and 122 units of permanent supportive housing.

Families with children have access to approximately 511 emergency shelter beds, 368 transitional housing beds and 517 units of permanent supportive housing. Approximately 812 emergency shelter beds, 237 transitional housing beds, and 583 permanent supportive housing beds are reserved for homeless adults. Sixteen emergency shelter beds are available for unaccompanied youth.

Services available to address the needs of these populations include those on the chart in the Strategic Plan and Market Analysis. Detail on these services and their geographic availability is available in the Community Resource Guide at this link:

http://www.kyhousing.org/Specialized-Housing/Documents/Community%20Resource%20Guide.pdf

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	28
PH in facilities	0
STRMU	168
ST or TH facilities	0
PH placement	0

Table 42 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Persons with HIV/AIDS have expressed a preference for community-based housing rather than facility-based housing. In order to ensure this population is served in a manner most beneficial to their needs and preferences, KHC's HOPWA program concentrates on tenant-based rental assistance and short-term rental, mortgage and utility assistance rather than facility-based housing solutions. HOPWA clients are eligible for services provided by the HIV Care Coordinator Program within the Kentucky Cabinet for Health and Family Services in Kentucky's five Care Coordinator regions.

Recovery Kentucky was created to help individuals recover from substance abuse, which often leads to chronic homelessness. There are ten currently-operating centers in the state and two more under development. Each center can serve up to 100 persons at a time. Recovery Kentucky centers are designed to reduce the state's drug problem and resolve some of the state's homelessness issues. As supportive housing projects, each center uses a recovery program model that includes peer support, daily living skills classes, job responsibilities, and establishes new behaviors.

Chafee Room and Board offers assistance to current and former foster care youths. Federal funds administered by the Cabinet for Health and Family Services provide short term rental assistance and assistance in establishing an independent household. Eligible participants are young adults age 18 to 21 who were in foster care on their 18th birthday or who were in the juvenile justice system.

Additional information about persons with severe mental illness is included in the next section.

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Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Olmstead Housing Initiative (OHI) is a partnership between KHC and the Cabinet for Health and Family Services. It was created in response to the 1999 Supreme Court Decision Olmstead v. L.C, 527 U.S. 581, that was an interpretation of Title II of the Americans with Disabilities Act (ADA).

OHI was created to meet the housing needs of one of the hardest to serve populations: people with Severe Mental Illness (SMI) who are in institutions, or who are at-risk of institutionalization. Efforts have been made to move individuals who are capable of living independently from institutions into affordable housing in communities of their choosing. Institutions for this population could be nursing homes, but are more typically psychiatric hospitals or personal care homes. OHI can pay for moving expenses, basic furnishings, security and utility deposits, and provide an on-going rental subsidy.

In addition to direct assistance to individuals, OHI funds are used to support the efforts of agencies engaged in the development of permanent supportive housing for the Olmstead population. Funds received from the Cabinet, but not used to assist Olmstead individuals are accumulated in an account designated for new unit development. These funds will be used to finance the construction of small rental projects for agencies that agree to own and operate the housing and provide supportive services to the tenants.

Referrals to OHI are made by staff of psychiatric hospitals, case managers of the community mental health agencies, or staff of the Kentucky Division of Protection and Advocacy. Referrals are submitted to KHC and the Cabinet simultaneously.

KHC has learned that its 2014 application for funding under HUD's Section 811 Project-Based Rental Assistance program was successful. KHC will receive nearly $6 million over five years to pay rental assistance under 150 project-based rental vouchers. These vouchers will be utilized to house adults with serious mental illness who will have access to voluntary supportive services. No more than 25 percent of a multifamily rental project's units may be designated at supportive housing under this program. Additional leverage units will bring the total new units created during the next few years to more than 300.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

KHC will continue to provide assistance funded by the Cabinet for Health and Family Services under the Chafee Room and Board Program. This program provides short-term rental assistance and household setup assistance to youth aging out of foster care, a population with a high incidence of homelessness.

KHC will continue to provide assistance funded by the Cabinet for Health and Family Services under the Olmstead Housing Initiative, providing permanent rental assistance vouchers and household setup assistance to persons with severe persistent mental illness at risk of becoming institutionalized or who are capable of leaving institutions and living independently. In addition, funding has been provided for the construction of permanent housing to assist this population. KHC was also recently notified of its successful application for Section 811 Project-Based Rental Vouchers which will provide an additional 150 funded housing units for this population. An additional number of leveraged units to support this initiative have also been pledged.

KHC and DLG continue to support the Recovery Kentucky initiative with 11 recovery centers currently constructed or under construction.

The Money Follows the Person program in Kentucky is known as Kentucky Transitions, and is administered solely by the Kentucky Cabinet for Health and Family Services. This program links persons with disabilities who currently reside in institutional settings to available housing in their community, where they can also recieve needed services to remain independently housed.

KHC plans to utilize some of its HOME allocation for Tenant-Based Rental Assistance. Numerous agencies, especially those serving domestic violence survivors, have stated that this funding serves as the gap between homelessness and permanent housing for populations that are the most difficult to serve, as a high number have little to no income and may not qualify for a housing choice voucher. In addition, KHC may reserve HOME funds for TBRA for persons temporarily displaced due to disasters and emergencies declared by the Governor.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not Applicable.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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 jurisdiction. The overall demand for affordable housing and the lack of funding to fulfill the demand continues to be the biggest barrier statewide.

According to HUD's Regulatory Barrier database for Kentucky, following is a list of some barriers and policies that increase the cost of housing:

- Subdivision requirements (wider streets, curbs and gutters, and sidewalks) increase the cost of affordable housing.
- Housing and building code enforcement is inefficient when property owners cannot be contacted and/or have insufficient funds to make necessary property changes.
- Abandoned or vacant property/land is often neglected and can negatively impact surrounding areas and neighborhoods.
- Lengthy permitting approval processes can decrease the supply of affordable housing.
- Lack of infill policies in urban areas can decrease the supply of affordable housing.
- Tax policies can increase the cost of housing.
- Rigid zoning regulations can discourage affordable housing development.
- Community opposition to affordable housing development is a barrier to affordable housing.
- Urban growth planning, while preventing sprawl, can increase land values and price low income households out of the market.
- Some building codes do not allow for adopting new technologies, techniques, and materials.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	26,333	26,443	3	3	1
Arts, Entertainment, Accommodations	106,547	87,583	11	12	0
Construction	46,645	36,436	5	5	0
Education and Health Care Services	160,839	124,474	17	16	-1
Finance, Insurance, and Real Estate	49,102	32,934	5	4	-1
Information	16,043	10,083	2	1	0
Manufacturing	164,681	143,679	17	19	2
Other Services	29,828	22,998	3	3	0
Professional, Scientific, Management Services	57,234	36,222	6	5	-1
Public Administration	0	0	0	0	0
Retail Trade	141,706	117,451	15	15	1
Transportation and Warehousing	46,903	39,811	5	5	0
Wholesale Trade	47,143	37,197	5	5	0
Total	893,004	715,311	--	--	--

Table 43- Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

OMB Control No: 2506-0117 (exp. 07/31/2015)

Labor Force

Total Population in the Civilian Labor Force	1,372,442
Civilian Employed Population 16 years and over	1,251,713
Unemployment Rate	8.80
Unemployment Rate for Ages 16-24	22.48
Unemployment Rate for Ages 25-65	4.96

Table 44 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	223,463
Farming, fisheries and forestry occupations	48,999
Service	127,151
Sales and office	301,781
Construction, extraction, maintenance and repair	146,292
Production, transportation and material moving	102,411

Table 45 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	817,093	68%
30-59 Minutes	301,506	25%
60 or More Minutes	76,766	6%
Total	***1,195,365***	***100%***

Table 46 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	93,893	16,000	147,776

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
High school graduate (includes equivalency)	379,444	34,190	190,294
Some college or Associate's degree	320,359	22,816	110,064
Bachelor's degree or higher	243,390	7,378	44,394

Table 47 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	6,113	12,885	16,718	58,893	101,296
9th to 12th grade, no diploma	42,744	35,952	41,227	92,149	57,775
High school graduate, GED, or alternative	96,129	126,183	149,298	330,767	138,976
Some college, no degree	99,458	90,982	90,334	151,874	55,285
Associate's degree	11,852	33,066	35,859	56,030	9,375
Bachelor's degree	12,987	52,371	52,304	75,967	22,704
Graduate or professional degree	946	21,289	31,514	63,363	21,244

Table 48 - Educational Attainment by Age

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

Over the past several years, Kentucky has identified core, targeted employment sectors to address the workforce needs of employers. These sectors include:

- Energy Creation/Transmission
- Health Care/Social Assistance
- Business Services/Research and Development
- Transportation, Distribution, and Logistics
- Automobile/Aircraft Manufacturing

Strategies to address the workforce needs within these sectors have been and continue to be developed by state and regional employer-driven partnerships. These partnerships coordinate information and resources to coordinate the strategies for common workforce challenges and are comprised of key industries and workforce and economic development professionals.

Describe the workforce and infrastructure needs of business in the state.

In general, the workforce infrastructure needs are:

- Training equipment at Kentucky's Area Technology Centers are significantly out of date and result in substandard training for high school students pursuing technical pathways.
- Training funds for job training programs such as the Cabinet for Economic Development's Bluegrass State Skills Corporation (BSSC) are underfunded based on demand. I.e. in FY 2013/14, the BSSC received 168 grant applications from Kentucky companies but were only able to fund 100 applications due to limited funds.

The growth and expansion of KY FAME is an excellent example of industry led initiatives that can enhance Kentucky's workforce. As KY FAME grows additional funding will be necessary to staff the organization and to provide resources to the Kentucky Community and Technical College system for facilities, equipment and instructors.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

In early 2015, Ford Motor Company announced that F-Series trucks produced at the Kentucky Truck Plant would be switching to a high-strength aluminum-alloy body. Due to Kentucky's historical strength in aluminum production, the Commonwealth is in excellent position for continued growth in the aluminum industry. To prepare for this growth, Kentucky's workforce system is developing a Materials Science Technician program through Kentucky Community and Technical College System (KCTCS) partners. To be responsive to market demands, KCTCS locations in Bowling Green and Owensboro are currently developing a customized two-year, apprenticeship-style Materials Science Technician degree

program in conjunction and in partnership with Western Kentucky University's Ogden School of Science and Engineering. The tentative start date of this program is set for the Fall Semester of 2015.

In addition, In August 2013, Toyota announced that it would grow its Toyota Motor Manufacturing Kentucky (TMMK) facility in Georgetown, KY by adding the United States' first Lexus manufacturing line. To accommodate the new 50,000 units of capacity that the Lexus ES represents, Toyota will be investing $360 million in the plant and hiring 750 new workers. One of the critical points for this decision was TMMK's confidence in the area's skilled workforce.

In the recruitment of Lexus, the Cabinet for Economic Development worked with the Bluegrass Community and Technical College to develop a new satellite campus, where the new Lexus employees will receive specialized training. The new campus, just down the road from the Toyota plant, will also be available for other Toyota training, supplier training, and more generalized classroom work in manufacturing. Both certifications and college credits will be offered.

Since 2005, the Bluegrass Community & Technical College (BCTC) has operated an Advanced Manufacturing Technician program for manufacturers at a satellite Georgetown Campus located at TMMK. To accommodate the Lexus line, BCTC developed and designed an Advanced Manufacturing Training Center to be built at Lanes Run Business Park. Through the partnership with BCTC, TMMK leads an industry partnership (the Kentucky Federation for Advanced Manufacturing Education (KY FAME) of several area employers to implement a work-study program to develop the skilled workforce of the future. The program offers students the opportunity to learn in the environment in which they work while also providing the chance for students to immediately apply what they learn to their job. This partnership has developed a skilled workforce pipeline for TMMK since the program's inception. By locating the Advanced Manufacturing Training Center in Lanes Run Business Park, Kentucky was able to demonstrate its commitment to provide a skilled workforce that meets the requirements for quality and efficiency that the Lexus and TMMK reputations demand.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

The graphic below provides insight into the supply and demand for jobs and careers in Kentucky. In general, Kentucky needs to increase technical associate and bachelor degree educational attainment to better meet the current and future job demands. The Work Ready Communities initiative addresses this issue through its county certification process. To receive a Work Ready certification, a county must demonstrate a plan to increase associate and bachelor degree attainment to 32 percent of the work age population within 3 years and 39 percent of the population within 5 years.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Gov. Steve Beshear announced the creation of the Kentucky Skills Network in February 2014. Its goal is to provide ease of service, professionalism, quality resources and results that will enhance the workforce delivery system in the Commonwealth. The Kentucky Skills Network brings together the solutions that individuals, employers and workforce professionals need to prosper in the global economy. Resources provided by the Kentucky Skills Network include:

- Grants and tax credits for training, tuition and certification

- Safety and health training

- Pre-employment recruitment, assessment and training

- Customized training

- Labor market research

In FY 2014, the state's economic development agency's consolidated services provided training for nearly 84,000 Kentuckians representing more than 4,000 companies from a variety of industry sectors, including manufacturing, healthcare, information technology, energy, distribution, and research and development. In all, Kentucky Skills Network partners provided more than $14 million in grant and tax credit funding to train employees of Kentucky companies.

The Kentucky Skills Network is a collaborative partnership between the Cabinet for Economic Development, the Kentucky Community & Technical College System, the Labor Cabinet and the Education and Workforce Development Cabinet.

Describe any other state efforts to support economic growth.

Kentucky takes a holistic approach to growing businesses, creating jobs and supporting the local workforce. The state not only lands the big international corporations and helps existing companies expand, but also is becoming a national leader in supporting entrepreneurs and small business. Here are a few examples of how the state supports economic growth:

Created new legislation to support businesses: The Kentucky Cabinet for Economic Development worked with the Kentucky General Assembly to expand the Kentucky Jobs Retention Act to allow more companies to take advantage of incentives for making significant investments in their Kentucky facilities. We also helped create Kentucky's first-ever individual Angel Tax Credit to encourage more angel investing in Kentucky startup companies.

Created new ways to assist both entrepreneurs and investors: Understanding that small businesses are the backbone of our economy, the Cabinet created the Office of Entrepreneurship. The Office helps companies of all shapes and sizes with everything from funding initiatives, to marketing and sales assistance, to small business advocacy to resource referrals. The Office of Entrepreneurship also

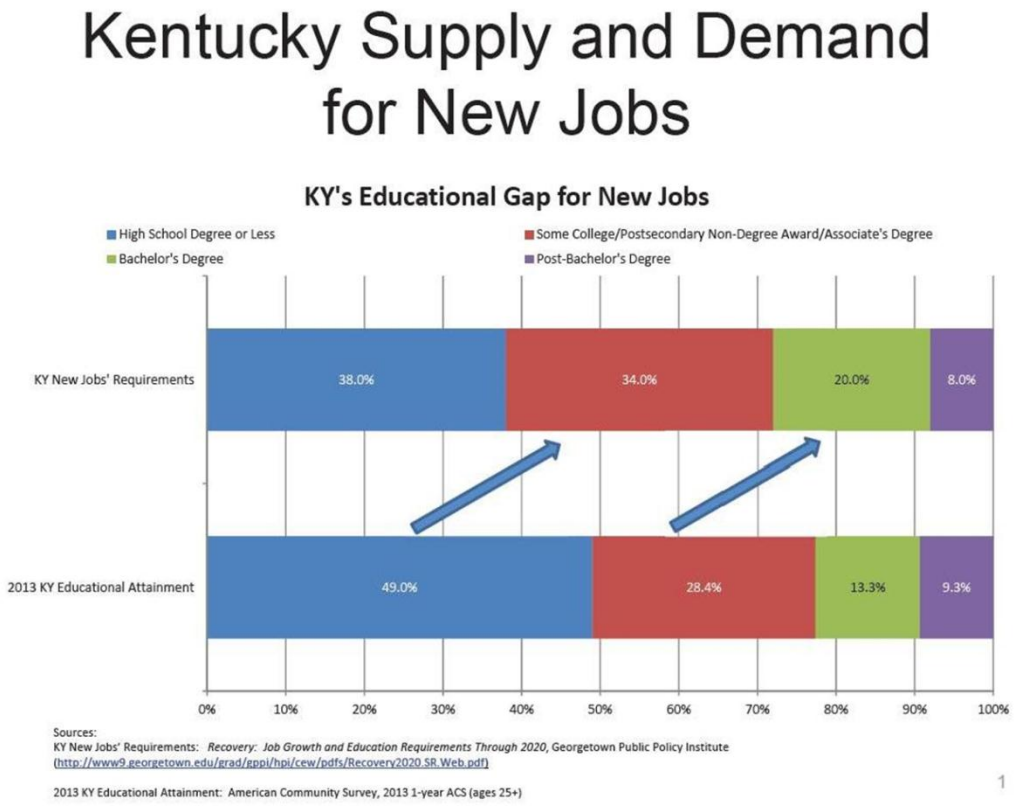
oversees the Kentucky Innovation Network. Consisting of 13 offices that reach all corners of the state, the Network offers extensive resources for small and new businesses, as well as innovative and high-tech companies. All services are provided free of charge. For investors, we created the Kentucky Angel Investors Network to make it easier for entrepreneurs and investors to connect and broker deals on a statewide basis.

Made site selection easy: Kentucky is helping site selectors to choose potential sites and communities to land highly competitive projects. To give Kentucky communities a significant advantage, the Cabinet recently launched its Build-Ready Program. In addition to shovel-ready sites and pre-existing buildings, communities now have the option of proactively preparing and marketing land to potential companies without assuming all the risk and cost of constructing a building. In short, a "Build-Ready" site is just that – one in which the preparation work has been completed and construction can begin almost immediately.

Launched the Kentucky Auto Industry Association (KAIA): Things get done when companies come together for a common purpose. That's why the Cabinet orchestrated the creation of the Kentucky Automotive Industry Association. An industry-led organization, KAIA was launched this year to create a unified voice for Kentucky's vast automotive network, which produces the third-most vehicles in the country. The association plays a vital role in addressing the challenges, solutions and opportunities facing the industry. Through this organization, competitors actually work together to improve the opportunities for all.

Grew Exports: Kentucky's export growth is up about 10 percent, well exceeding the national average. The Cabinet has facilitated recent trade missions to the United Kingdom and Canada. It also created the Kentucky Export Initiative, designed to create a global market for more Kentucky-made products.

Discussion



Jobs Supply and Demand

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The most prevalent housing problem based on data in the needs assessment is housing cost burden. Kentucky's statewide rate for housing cost burden (paying more than 30 percent of income for housing costs) is 28.03 percent. Concentration is defined as a rate 10 percentage points higher than the state rate, or 30.83 percent. Kentucky's statewide rate for substandard housing is 1.01 percent. Concentration is defined as a rate 10 percentage points higher than the state rate, or 1.11 percent. However, as has been discussed previously in the needs asessment and market analysis, the data used to establish substandard housing provided by the U.S. Census is limited in scope and may not include housing units that are substandard by the state's definition.

Data indicate that the highest concentration of households with housing cost burden and any other housing problem (substandard housing) are in the following counties:

- Jackson (32% cost burden/1.44% substandard housing)
- Garrard (31.43% cost burden/1.25% substandard housing)
- Warren (32.39% cost burden/1.11% substandard housing)
- Gallatin (32.53% cost burden/1.17% substandard housing)
- Jessamine (33.62% cost burden/1.43% substandard housing)
- Bath (37.97% cost burden/1.86% substandard housing)
- Powell (35.43% cost burden/3.38% substandard housing)

A household is considered severely cost burden if they are paying more than 50 percent of their income for housing costs. The Kentucky statewide rate for severe housing cost burden is 11.93 percent. Concentration is defined as a rate ten percentage points higher than the state rate, or 13.12 percent. Severely housing cost burdened households that are also residing in substandard housing are concentrated in the following counties:

- Clay (17.38% severe cost burden/1.26% substandard housing)
- Madison (13.15% severe cost burden/1.11% substandard housing)
- Knox (14.87% severe cost burden/1.59% substandard housing)
- Rockcastle (14.97% severe cost burden/2.08% substandard housing)
- Pulaski (14.94% severe cost burden/3.05% substandard housing)
- Jessamine (14.19% severe cost burden/1.43% substandard housing)
- Jackson (14.36% severe cost burden/1.44% substandard housing)
- Warren (14.74% severe cost burden/1.11% substandard housing)
- Lincoln (13.17% severe cost burden/2.14% substandard housing)
- Bath (19.63% severe cost burden/1.86% substandard housing)
- Estill (14% severe cost burden/1.67% substandard housing)

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Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Minority concentration is defined as a county with minority rates for any race that is twice as high as the statewide rate for that minority population.

The Black/African American population comprises 7.71 percent of the population statewide. Two counties in the non-entitlement jurisdiction covered by this plan are considered to have a concentration of the Black-African American population - Fulton (23.35 percent) and Christian (21.05 percent). Both of these counties are located in the far western part of the state. Fulton County is considered part of the Mississippi Delta region as it borders the Mississippi River.

The American Indian/Alaskan Native population comprises 0.17 percent of the population statewide. Numerous counties in Kentucky in the non-entitlement jurisdiction covered by this plan are considered to have a concentration of the American Indian/Alaska Native population:

- Webster (0.47%)
- Rockcastle (0.36%)
- Christian (0.38%)
- Trimble (0.77%)
- Bourbon (0.39%)
- Carlisle (1.18%)
- Hancock (0.42%)
- Martin (0.93%)
- Butler (2.22%)
- Russell (0.35%)
- Spencer (0.48%)
- Bullitt (0.35%)
- Meade (0.38%)
- Estill (0.4%)
- McCreary (0.7%)

The Asian population comprises 1.09 percent of the population statewide. One county in the non-entitlement jurisdiction covered by this plan is considered to have a concentration of the Asian population - Warren County with 2.54 percent.

Persons reporting two or more races comprise 1.39 percent of the population statewide. McCreary County is comprised of 2.78 percent of persons who report that their race is two or more races combined.

The Hispanic population comprises 2.89 percent of Kentucky's total population. The following counties are considered to have a concentration of the Hispanic population:

- Carroll (6.65%)
- Woodford (6.17%)
- Christian (6.15%)
- Shelby (8.71%)
- Bourbon (6.24%)

What are the characteristics of the market in these areas/neighborhoods?

The areas of the state with multiple housing problems are primarily rural, especially in the Appalachian region. Many of the counties listed above with concentrations of severe cost burden and substandard housing, also have poverty and unemployment levels higher than than the state average. Some Appalachian counties have poverty rates higher than 40 percent. Counties with high minority concentrations generally have higher poverty and unemployment rates.

Are there any community assets in these areas/neighborhoods?

Because many of these counties are very rural with a high number in Appalachia, community assets are less prevalent than in urban areas.

Are there other strategic opportunities in any of these areas?

The Supporting Our Appalachian Region (SOAR) initiative is a newly formed group including federal, state, local and private interests to help identify development strategies in agriculture, business recruitment, health, tourism and other areas. The overall goal is to create quality jobs in region.

KHC and DLG also enjoy a close working relationship with many organizations whose focus is on housing and economic development in rural areas, especially Appalachia.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

KHC and DLG have established a strategic plan to address housing and community development needs during the next five years. Shrinking financial resources, combined with increasing needs create many challenges. The priority needs discussed in this section are all treated equally - and rated as high priorities. As annual Action Plans are created based on the available resources, funds will be allocated to activities based on many factors. Because KHC and DLG attempt to serve the needs of most of the state, geographic priorities are not established as high level strategies.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

1	**Area Name:**	Non-Entitlement Geographic Area
	Area Type:	Other
	Other Target Area Description:	Other
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Statewide, except in localities that receive a direct allocation of block grant funds. In most instances, this encompasses 118 of Kentucky's 120 counties, excluding Louisville and Lexington. However, in some instances, the state may elect to utilize some resources in entitlement areas as described throughout the plan.
	Include specific housing and commercial characteristics of this target area.	See needs assessment and market analysis
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This area is the state's participating jurisdiction
	Identify the needs in this target area.	See needs assessment
	What are the opportunities for improvement in this target area?	See market analysis
	Are there barriers to improvement in this target area?	See needs assessment, market analysis, and strategic plan.
2	**Area Name:**	Statewide
	Area Type:	PJ area plus other entitlement areas
	Other Target Area Description:	PJ area plus other entitlement areas
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	

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	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

KHC and DLG do not allocate investments geographically within the state in general, as funding applications are scored competitively. Individual programs may consider geographic balance when distributing funds as described below.

CDBG: All cities and counties in Kentucky are eligible for participation in the CDBG Program with the exception of 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. The *state has established one geographic priority area that encompasses areas of the state that are not entitlement jurisdictions. Most programs allocate only to this geographic area unless special circumstances dictate otherwise. The HTF program has not designated a limited geographic area.*

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. KHC may allocate funds on a contingency basis for natural disasters or emergencies as declared by the governor to be used for TBRA for displaced households.

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ESG: All of Kentucky's allocation must be made available to Balance of State Continuum of Care cities and counties or private nonprofit organizations on a competitive basis. 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. Funding will be made available as renewal of last fiscal year's funding distributed to five areas of the Commonwealth established for funding distribution by the Cabinet for Health and Family Services. The formula is based on the number of reported persons living with AIDS in each of the regions according to the Kentucky Department for Public Health, Division of Epidemiology and Health Planning.

Eligible applicants for HOPWA funding will submit plans for the use of HOPWA funding to KHC. The plans outline the activities to be undertaken and the process for the use of funding.

HTF: Funds are allocated to multifamily rental projects for new construction or rehabilitation. There is no restriction on the geographic location of projects funded in the state unless restrictions associated with other funding tied to the project affects location.

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

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	**Priority Need Name**	Rental Assistance
	Priority Level	High
	Population	Extremely Low Low Persons with HIV/AIDS Persons with HIV/AIDS and their Families
	Geographic Areas Affected	Other
	Associated Goals	ESG Activities HOME Rental Assistance HOPWA Activities
	Description	Tenant-Based Rental Assistance and short-term rental assistance for special needs households
	Basis for Relative Priority	TBRA assists families at the lowest income levels, and assists those who may not qualify for a Housing Choice Voucher. Housing Choice Vouchers are in short supply, and this activity assists in filling the gap. ESG and HOPWA activities are focused on providing rental assistance to prevent and end homelessness.
2	**Priority Need Name**	Production of New Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	Other
	Associated Goals	HOME Homeowner Activities HOME Multifamily Activities HTF Multifamily Activities
	Description	Production of new rental or homeowner-occupied affordable housing.

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	Basis for Relative Priority	There continues to be a high need for affordable rental housing throughout the state. Needs data indicate that there is a large gap between affordable rental housing stock and availability. In addition, especially in rural areas, families prefer to own their home rather than rent. The production of affordable owner-occupied housing remains a need.
3	**Priority Need Name**	Rehabilitation of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	Other
	Associated Goals	CDBG Housing HOME Homeowner Activities HOME Multifamily Activities HTF Multifamily Activities
	Description	Rehabilitation of existing affordable rental housing and owner-occupied housing.
	Basis for Relative Priority	The state of Kentucky is in danger of losing nearly 50,000 affordable rental units through 2020. In addition, owner-occupied housing continues to age. Those in the lowest income levels have difficulty affording major repairs and renovations on substandard housing. Lack of energy efficiency directly contributes to housing cost burden.
4	**Priority Need Name**	Acquisition/Rehabilitation of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	Other

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	Associated Goals	HOME Multifamily Activities HTF Multifamily Activities
	Description	Aquisition and Rehabilitation of affordable housing.
	Basis for Relative Priority	Rehabilitation of rental housing in order to preserve the units may involve aquisition of a project by a new owner. Rehabilitation of rental housing will help preserve units that are in danger of being lost from the housing inventory.
5	**Priority Need Name**	Homelessness Outreach
	Priority Level	High
	Population	Extremely Low Low Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Other
	Associated Goals	ESG Activities
	Description	Outreach to homeless populations
	Basis for Relative Priority	Assisting the chronically homeless and unsheltered homeless
6	**Priority Need Name**	Emergency/Transitional Housing For the Homeless
	Priority Level	High

	Population	Extremely Low Low Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Other
	Associated Goals	ESG Activities
	Description	Provision of emergency shelter activities and transitional housing for homeless and special needs populations.
	Basis for Relative Priority	Nearly 4,000 persons are provided with emergency shelter housing each year in Kentucky. The number of homeless persons in the state have remained constant, many in rural areas. Transitional housing is instrumental in moving persons from shelters and other non-permanent housing venues and acts as a stepping stone toward permanent housing solutions.
7	**Priority Need Name**	Rapid-Rehousing
	Priority Level	High

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	Population	Extremely Low Low Moderate Middle Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence
	Geographic Areas Affected	Other
	Associated Goals	ESG Activities
	Description	Assistance to rapidly re-house homeless families.
	Basis for Relative Priority	Rapid Re-Housing of homeless families assists more than 1,000 households yearly in Kentucky. Data indicate that households that are re-housed rapidly have a higher housing success rate.
8	**Priority Need Name**	Homelessness Prevention
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Rural Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Persons with HIV/AIDS and their Families Victims of Domestic Violence

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	Geographic Areas Affected	Other
	Associated Goals	ESG Activities
	Description	Preventing families on the verge of homelessness from becoming literally homeless by providing housing assistance.
	Basis for Relative Priority	Homelessness prevention is preferable to literal homelessness. Once an individual or family becomes homeless, a myriad of problems follow.
9	**Priority Need Name**	Public Facilities
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	CDBG Public Facilities
	Description	May include Senior Centers, Handicapped Centers, Homeless Facilities, Youth Centers, Childcare Centers, Neighborhood Facilities, Fire Stations/Equipment, Health Facilities, Parks/Recreational Facilities, or Facilities for Speical Needs Populations.
	Basis for Relative Priority	CDBG funding is a major source of funds in the state for these facilities.
10	**Priority Need Name**	Public Improvements/Infrastructure
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	CDBG Public Improvements/Infrastructure

	Description	May include Water/Sewer Improvements and Flood Drainage Improvements
	Basis for Relative Priority	CDBG focuses on these limited activities and funds other eligible activities with other funding sources.
11	**Priority Need Name**	Public Services
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	CDBG Services
	Description	Services for Recovery Kentucky
	Basis for Relative Priority	DLG limits its public services funding to Recovery Kentucky programs throughout the state
12	**Priority Need Name**	Economic Development
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	CDBG Economic Development
	Description	Economic development activities
	Basis for Relative Priority	Economic development is an important activity to revitalize communities
13	**Priority Need Name**	Other Housing and/or Service Needs
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with HIV/AIDS and their Families
	Geographic Areas Affected	Other
	Associated Goals	ESG Activities HOPWA Activities
	Description	Focused on other housing and service needs for special needs programs, such as short-term mortgage assistance and service needs for HOPWA-eligible households and street outreach to homeless persons under ESG.
	Basis for Relative Priority	Persons with HIV/AIDS are in need of housing supports to help them remain in their homes. Services, especially transportation needs, are in high demand. In addition, street outreach to homeless persons aids in moving them from unsheltered to shelterd.

Narrative (Optional)

The new National Housing Trust Fund's priority needs are included under priority needs 2, 3, and 4.

OMB Control No: 2506-0117 (exp. 07/31/2015)

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Housing choice vouchers across the state, including those administered by KHC, are in very short supply. Waiting lists are very long. Tenant-based rental assistance provided under the HOPWA program is in high demand, as the population assisted by this program prefer to live independently in their home communities. HOME TBRA provides vital gap funding while persons await permanent vouchers. HOME TBRA may be provided through a disaster contingency allocation in the event of a natural disaster or emergency declared by the governor. TBRA funding is also vital to assist victims of domestic violence and other special needs populations to locate housing quickly. The TBRA program allows persons who might not qualify for a housing choice voucher to access assistance.
TBRA for Non-Homeless Special Needs	TBRA funding is vital to assist victims of domestic violence and other special needs populations who need to locate housing quickly. The TBRA program allows persons who might not qualify for a housing choice voucher to access assistance. Tenant-based rental assistance provided under the HOPWA program is in high demand, as the population assisted by this program prefer to live independently in their home communities.
New Unit Production	There continues to be a shortage of safe, decent, affordable housing in Kentucky. There is only one affordable rental housing unit for very three families that need to locate housing. In addition, new homeownership units are needed to house families in rural areas where ownership is preferred over renting.
Rehabilitation	Kentucky is in danger of losing nearly 50,000 affordable rental units in the next five years. *Older multifamily housing is in need of repair, which if it is not addressed, can result in the loss of the units as well as rental subsidy tied to the projects.* In addition, older owner-occupied housing, especially older manufactured housing, is not energy efficient, causing families to be cost burdened. Total housing costs (rent/mortgage plus utililties) is very high in non-energy efficient, older housing.
Acquisition, including preservation	Many rental projects are nearing the end of their required affordability period, owners may wish to divest themselves of the housing, allowing a new owner to acquire the units to rehabilitate and renew the affordability period. Homeowner housing opportunities may also be created by the acquisition and rehabilitation of single family homes.

Table 52 – Influence of Market Conditions

OMB Control No: 2506-0117 (exp. 07/31/2015)

SP-35 Anticipated Resources - 91.315(a)(4), 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, CHDO set-aside funds, and contingency funds are not included in allocations to activities. Allocations to activities may change based on need, demand, and other factors.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	23,137,162	0	0	23,137,162	115,000,000	CDBG funding has decreased substantially during the past several years and this trend is expected to continue.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	8,846,758	1,000,000	4,783,650	14,630,408	44,000,000	HOME funding has decreased substantially during the past several years and this trend is expected to continue.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	530,584	0	0	530,584	2,650,000	HOPWA funding has remained relatively stable during the past several years and is based on the number of reported HIV/AIDS cases. During the coming years, an increase in HIV/AIDS cases may be expected due to increased heroin use in this area of the country.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	2,417,145	0	0	2,417,145	12,000,000	ESG funding has increased substantially during the past several years as the program has been revised to include a focus on rapid-rehousing.
Other	public - federal	Multifamily rental new construction Multifamily rental rehab	3,000,000	0	0	3,000,000	12,000,000	Housing Trust Fund, multifamily housing for extremely low-income and very low income households. HTF funding is a new federal resource. The amount of funds available for future allocations may vary.

Table 53 - Anticipated Resources

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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 continue to 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 our recipients – nonprofits, private developers and units of local government – have contributed a large amount of matching funds with their projects. In fact, in the past, HOME recipients have provided enough matching funds annually to allow the state to carry match forward to future years. In addition, 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.

There are several block grant programs that 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.

For example, KHC encourages all HOME Program applicants match their total HOME request with at least 10 percent of HOME-eligible matching sources, and points awarded to applications may be based in part on matching funds and leverage. 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 to assist in meeting HUD matching requirements to increase the amount of funds available to provide affordable housing.

Each ESG recipient must match the funding provided by ESG with an equal value of contributions from other sources. These funds must be provided after the date of the grant award. In calculating matching funds, 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.

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It is anticipated that matching funds will come from a variety of sources, both public and private. Each sub-recipient of ESG funds will be required to match their allocation at a one-to-one level or higher. Because many agencies will be able to use in-kind donations of both goods and services as well as cash contributions, it is anticipated that the Kentucky State ESG program will access a sufficient amount of matching funds.

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 Housing Trust Fund (HTF) project applicants. However, because these funds are 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. The amount of non-federal funding associated with most projects will be substantially higher than the amount of HTF funding allocated to the project.

If appropriate, describe publically owned land or property located within the state 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, NHTF, and other funding, including state Affordable 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

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- 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

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SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
KENTUCKY HOUSING CORPORATION	Government	Homelessness Non-homeless special needs Ownership Planning Rental	Jurisdiction
KENTUCKY, COMMONWEALTH OF (CDBG GRANT PAYMENTS ONLY)	Government	Economic Development Planning neighborhood improvements public facilities public services	Jurisdiction
Kentucky Balance of State Continuum of Care		Homelessness Planning	

Table 54 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

KHC and DLG partner numerous entities to deliver the housing and economic development activities under the Consolidated Plan. Because these entities have not yet been awarded funding under the plan, we cannot name all of them. Included in the delivery structure in this section are KHC and DLG, along with some of the state agencies who already partner with KHC and DLG under existing programs that are expected to continue under this plan. Both KHC and DLG depend on the active participation of partners to accomplish the overall goals of these programs.

KHC and DLG will continue to partner with a diverse number of entities from private industry, non-profit organizations, local governments, 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 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. In addition to entities that receive funding under the Consolidated Plan programs, KHC and DLG consult with state agencies, local governments, federal agencies, and many other entities that serve the same populations

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assisted under these programs. KHC is the coordinating entity for the Balance of State Continuum of Care, emcompassing 118 of Kentucky's 120 counties.

KHC administers numerous housing programs as well as statutory housing committees, all of which enhance the coordination of programs and assistance statewide. KHC administers the Housing Choice Voucher program in counties where there is no local housing authority. KHC works directly with HUD in the administration of the Risk-Sharing Program in order 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 is attended by hundreds of representatives of various housing and related service organizations.

KHC coordinates the state's Housing Policy Advisory Committee and Kentucky Interagency Council on Homelessness. Many private housing developers utilize the Housing Credit 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 250 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.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance		X	
Mortgage Assistance			X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement			
Mobile Clinics		X	
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	

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Supportive Services			
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			

Table 55 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

In order to improve access to homeless services statewide, KHC uses the lists of existing homeless services to maintain a CoC Resource Guide. This guide is made available on KHC's and the Kentucky Interagency Council on Homelessness Web site to persons seeking assistance and to service agencies that provide assistance (www.kyhousing.org and www.kyhomeless.org). To ensure the publication's accuracy, KHC solicits updates and makes changes regularly on the Web site. In addition, the Commonwealth of Kentucky also operates a statewide, web-based referral system of all mainstream services called KyCARES.

The Kentucky Interagency Council on Homelessness has developed an assessment tool to assist the CoC systematically helps homeless persons identify, apply for and receive mainstream benefits. It is included in the statewide HMIS system.

In addition, the Kentucky Interagency Council on Homelessness has developed a training program on the needs of homeless persons and the barriers to mainstream services. This program is mandatory for all new employees of the state Cabinet for Health and Family Services and includes TANF, food stamps, SSI, SSDI, Medicaid, Medicare, foster care and S-CHIP programs. HUD and local community leaders have offered workshops on access to Mainstream Services and Legal Aid helps with appeals for mainstream services. Information about all mainstream services administered by the state can be accessed at state government's main website and several applications for services are accessible at KyCares.net.

Kentucky Housing and the Kentucky Interagency Council on Homeless partnered to move forward the state's involvement with the SSI/SSDI Outreach Access and Recovery (SOAR). SOAR is a national initiative in cooperation with Policy Research Associates and the Social Security Administration which trains case managers from local agencies to assist their clients with the application process to access disability income. History has shown that a low percentage of people who qualify for such income are approved

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due to the complicated and time-consuming process of application. SOAR has goals to increase the percentage of successful applications, to reduce the number of appeals of negative decisions and to decrease the time between application and decision.

The Kentucky Cabinet for Health and Family Services is responsible for planning and distribution of state and federal funds for youth programs. The Chafee Room and Board program includes services to youth aging out of foster care and those in the juvenile justice system.

Agencies in five care coordinator regions administer HOPWA funds for housing and services in addition to Ryan White funding to assist persons affected by HIV/AIDS.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

KHC administers numerous programs that assist special needs populations and homeless persons. Because of KHC's role, programs are better able to coordinate funding, goals, and application deadlines to ensure the programs are effective. KHC is the lead agency for the Balance of State Continuum of Care, encompassing 118 of Kentucky's 120 counties. All three of the state's Continuum of Care regions also coordinate and work across boundaries. KHC is currently undertaking an analysis of the service delivery gaps in the Balance of State Continuum of Care, which will be addressed by the institution of a coordinated entry system and performance-based funding allocation system.

HOPWA grantees are encouraged to participate in the CoC system where they may be more successful in combining housing and services with other providers whomay serve the same or similar populations. HOPWA Care Coordinator Regions have been established by the Cabinet for Health and Family Services.

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 throughout the state.

KHC and the Cabinet for Health and Family Services partner on numerous initiatives, allowing for focused programs that provide housing and services to youth aging out of foster care and persons with severe mental illness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

KHC and DLG continue to undertake activities to strengthen partnerships and close gaps. These activities include, but are not limited to:

The Kentucky Interagency Council on Homelessness (KICH) is composed of representation from state government, nonprofit and advocacy agencies to collaborate and perform the following functions and duties: 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 Homeless. 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 also 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.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOME Homeowner Activities	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing	HOME: $15,000,000	Homeowner Housing Added: 310 Household Housing Unit Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	HOME Rental Assistance	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Rental Assistance	HOME: $3,000,000	Tenant-based rental assistance / Rapid Rehousing: 1600 Households Assisted
3	HOME Multifamily Activities	2015	2019	Affordable Housing		Acquisition/Rehabilitation of Affordable Housing Production of New Affordable Housing Rehabilitation of Affordable Housing	HOME: $25,000,000	Rental units constructed: 100 Household Housing Unit Rental units rehabilitated: 100 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	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 Rental Assistance	ESG: $11,250,000	Homeless Person Overnight Shelter: 20000 Persons Assisted Homelessness Prevention: 5000 Persons Assisted Other: 8000 Other
5	HOPWA Activities	2015	2019	Non-Homeless Special Needs	Non-Entitlement Geographic Area	Other Housing and/or Service Needs Rental Assistance	HOPWA: $2,500,000	Tenant-based rental assistance / Rapid Rehousing: 155 Households Assisted Other: 945 Other
6	CDBG Housing	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Rehabilitation of Affordable Housing	CDBG: $13,000,000	Homeowner Housing Rehabilitated: 194 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	CDBG Economic Development	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Economic Development	CDBG: $5,000,000	Jobs created/retained: 938 Jobs Businesses assisted: 26 Businesses Assisted
8	CDBG Public Facilities	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Facilities	CDBG: $10,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 157680 Persons Assisted
9	CDBG Services	2015	2019	Recovery Kentucky Services	Non-Entitlement Geographic Area	Public Services	CDBG: $5,000,000	Public service activities other than Low/Moderate Income Housing Benefit: 5900 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	CDBG Public Improvements/Infrastructure	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Improvements/Infrastructure	CDBG: $7,500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 46922 Persons Assisted
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: $12,000,000	Rental units constructed: 8 Household Housing Unit Rental units rehabilitated: 60 Household Housing Unit

Table 56 – Goals Summary

Goal Descriptions

1	**Goal Name**	HOME Homeowner Activities
	Goal Description	Down payment and first mortgage assistance; owner-occupied rehabilitation, owner-occupied new construction

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2	**Goal Name**	HOME Rental Assistance
	Goal Description	Tenant-based rental assistance
3	**Goal Name**	HOME Multifamily Activities
	Goal Description	Rehabilitation of rental housing with or without acquisition; new construction
4	**Goal Name**	ESG Activities
	Goal Description	Emergency shelter facilities, rapid-rehousing, homeless prevention, and other eligible ESG program activities
5	**Goal Name**	HOPWA Activities
	Goal Description	Short Term Rental, Mortgage, and Utility assistance and services to allow persons with HIV/AIDs to retain housing. Tenant-based rental assistance to help clients obtain permanent housing. Supportive services to provide needed counseling assistance with child care, nutritional classes, etc.. Permanent housing placement to pay for first month's rent and deposits in order to obtain housing. Housing information services to assist clients with information needed to obtain housing.
6	**Goal Name**	CDBG Housing
	Goal Description	Assistance for construction, rehabilitation, or homebuyer assistance for single family and multifamily affordable housing.
7	**Goal Name**	CDBG Economic Development
	Goal Description	Economic Development
8	**Goal Name**	CDBG Public Facilities
	Goal Description	Eligible CDBG public facilities (i.e., Senior Centers)

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9	**Goal Name**	CDBG Services
	Goal Description	Eligible CDBG public services for Recovery Kentucky
10	**Goal Name**	CDBG Public Improvements/Infrastructure
	Goal Description	Water, wastewater and drainage projects
11	**Goal Name**	HTF Multifamily Activities
	Goal Description	New construction or rehab of affordable rental properties.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

KHC and DLG expect to provide affordable housing to more than 3,000 extremely low-income, low-income, and moderate-income families over the next five years using the resources available under HOME, ESG, HOPWA, *NHTF,* and CDBG. Funding is expected to be awarded to projects in non-entitlement areas of the state unless KHC determines that a portion of funding is needed to supplement projects in entitlement areas.

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SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not Applicable.

Activities to Increase Resident Involvements

The Family Self-Sufficiency (FSS) Program, administered by KHC to Housing Choice Voucher program participants, provides supportive services to participants who possess a housing choice voucher when they sign a five-year contract of participation. The ultimate 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.

Voucher Programs to allow families housed by local housing authorities the knowledge and qualifications to access KHC's single-family loan programs. In addition, KHC has established a homeownership voucher program that allows qualifying families to use their Housing Choice Voucher for homeownership.

KHC's PHA Plan is available on with Web at http://www.kyhousing.org/Rental/Pages/default.aspx.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

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

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

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 jurisdiction.Â The overall demand for affordable housing and the lack of funding to fulfill the demand continues to be the biggest barrier statewide.

According to HUDâ¿¿s Regulatory Barrier database for Kentucky, following is a list of some barriers and policies that increase the cost of housing:

- Subdivision requirements (wider streets, curbs and gutters, and sidewalks) increase the cost of affordable housing.
- Housing and building code enforcement is inefficient when property owners cannot be contacted and/or have insufficient funds to make necessary property changes.
- Abandoned or vacant property/land is often neglected and can negatively impact surrounding areas and neighborhoods.
- Lengthy permitting approval processes can decrease the supply of affordable housing.
- Lack of infill policies in urban areas can decrease the supply of affordable housing.
- Tax policies can increase the cost of housing.
- Rigid zoning regulations can discourage affordable housing development.
- Community opposition to affordable housing development is a barrier to affordable housing.
- Urban growth planning, while preventing sprawl, can increase land values and price low income households out of the market.
- Some building codes do not allow for adopting new technologies, techniques, and materials.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

On the state level, there are numerous examples of state agencies working in cooperation to reduce regulatory 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.
- 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.

- Lack of a uniform landlord-tenant law statewide in Kentucky has been seen as an issue. Advocacy groups are working to enact a statewide law that would protect renters and landlords alike.

SP-60 Homelessness Strategy – 91.315(d)

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 was made available across the state.

KHC will continue to work closely with the Kentucky Interagency Council on Homelessness (KICH), Continuum of Care agencies and other state agencies 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 and transitional housing needs of homeless persons

KHC participates in HUD's Continuum of Care (CoC) programs and serves as the lead applicant in the annual CoC application for the Balance of State region. Kentucky's CoC process is a local or regional system for helping people who are homeless, or at risk of homelessness, by providing housing and services appropriate to the whole range of homeless needs in the community. In addition, the KICH works closely with members of the CoC to coordinate needs for emergency shelters and transitional housing units. Services are also coordinated through this process. Data is collected in the statewide Homeless Management Information System (HMIS) by agencies that provide housing and services through the continuum.

While the ESG funding application places a priority on rapid re-housing(RRH) programs serving both individuals and families with children, KHC is still allowing a portion of the allocation to be requested and used in the Emergency Shelter Component. The ability for emergency and transitional shelters to work closely with local RRH programs provides a beneficial partnership. Many shelter programs also operate a RRH program within their agency, therefore providing an avenue for clients to move from homelessness to permanent housing while still receiving a continuum of services.

Focus activities include:

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- 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 Rapid Rehousing (RRH) programs and by working with the CoC to identify agencies to apply for new CoC RRH projects, 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. 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 five VASH programs and three 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 ESG applications provide scoring incentives for agencies targeting veterans as well as chronically homeless individuals or homeless families with children.

Activities planned for the coming year to address housing needs of homeless individuals and families and to prevent low-income individuals and families from becoming homeless include the activities listed below.

- Acquisition, construction, renovation, major rehabilitation or conversion of structures for use as transitional and permanent supportive housing for homeless persons.
- Payment of maintenance, operation, rent, repair, security, equipment, insurance, utilities and furnishings of transitional and permanent housing.

KHC is also partnering with HUD to take steps to end veteran homelessness in Kentucky. KHC has dedicated housing assistance for 100 homeless Kentucky veterans to be available through the new Veterans Emerging Towards Transition (VETT) Program. Through the VETT program, KHC will designate a preference for 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. Through KHC, local service

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providers will coordinate the completion of certification checklists to be sued as referral tools to qualify homeless veterans for the housing assistance.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and 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 21. A partnership between KHC and CHFS provides up to six months of initial rental assistance plus an additional six months if needed, through the Chafee Room & Board program. Recent HMIS data show that less than one percent of persons in emergency shelter had come from foster care placement. 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 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. Recent HMIS data showed that less than two percent reported hospitals or nursing homes as their prior living situation.

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 vast majority of persons discharged from state psychiatric hospitals return to their own home. KHC partners with the state on two programs specifically targeting this population. KHC's Olmstead housing initiative is expected to assist nearly 100 persons during the first year of this plan 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. 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 program. The transitional housing has 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 and transitional housing placements when a family member or friend is not available to support the offenders' transition into the community. The Recovery Kentucky program assists persons with addictions. The centers are funded by DLG, KHC, the Department of Corrections, and other funds, and are expected to assist more than 1,000 persons this year. CDBG services funding and KHC rental assistance funding support more than 10 centers across the state.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Both KHC and DLG have a commitment to ensure that recipients of HOME, CDBG, ESG, 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, and HOPWA funds are made aware of the requirements of the lead-based paint regulations as they apply for funds. 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.

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.

How are the actions listed above integrated into housing policies and procedures?

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 in the course of rehabilitation.

KHC adopted an environmental assessment policy several years ago. KHC anticipates ongoing 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.

Funded applicants under the HOME, ESG and HOPWA programs receive formal training and individual technical assistance provided by staff. This technical assistance is available through the life of the project.

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.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

KHC and DLG provide affordable housing and economic development opportunities in an effort to decrease the number of poverty-level families living in unsafe and unaffordable housing.

KHC's programs range from homeless assistance and rental assistance to homeownership and housing financing programs. Self-sufficiency programs and services are also available. 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.

Supporting our Appalachian Region (SOAR) is a new initiative focused on assisting the poorest region of the state in overcoming poverty and providing opportunity. DLG and KHC are both participants in this initiative.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

To meet the goal of raising the standard of living for all low-income individuals and families, DLG, KHC, and other state agencies are committed to assisting individuals in achieving employment; continuing adult education and post-secondary 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.

DLG will continue to fund traditional economic development activities that create or retain jobs principally benefiting low- and moderate-income persons. Nontraditional economic development

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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. Microenterprise development is designated to provide funds to local communities and community-based organizations for the purpose of providing assistance and technical services to low- to moderate-income persons who either currently own a small business or are interested in starting one.

KHC will continue to provide housing assistance to many programs that serve the lowest income level households to provide opportunities to reduce poverty.

Scholar House is a housing and education initiative that enables the head-of-household to reach self-sufficiency. The housing and education components are operated as one unit, with housing depending on the client's successful participation in the affiliated educational institution. Participants must be at least 18 years of age, be eligible for a Housing Choice Voucher, and be full-time students in a degree or specialty institution of higher learning. Single parents are given first priority. Program participants receive counseling, workshops, and support from neighbors and staff, while fulfilling academic or vocational training coursework as full-time students. Each development includes an on-site child care facility to allow time for the parents to attend classes and focus on their education.

Scholar House also offers programs that involve enhanced health maintenance, parenting skills, management of family resources, nutritional knowledge, problem solving, work skills, and job search techniques. Most of these services are free. Housing and childcare are based on the participant's income. Once residents have graduated from Scholar House, they are allowed ample time to find and move into permanent housing.

The John H. Chafee Foster Care Independence Program offers assistance to help current and former foster care youths achieve self-sufficiency. Activities and programs include, but are not limited to; help with education, employment, financial management, housing, emotional support, and assured connections to caring adults for older youth in foster care. The program is intended to serve youth who are likely to remain in foster care until age 18; youth who, after attaining 16 years of age; have left foster care for kinship guardianship or adoption; and young adults ages 18-21 who have "aged out" of the foster care system.

One component of the broader program is the Chafee Room and Board initiative. Through a contract with the Cabinet for Health and Human Services, KHC administers this initiative. Funds are available for rental assistance based on income, rental and utility security deposits, utility assistance in some cases, and a Household Setup Fund to help furnish the living space.

SP-80 Monitoring – 91.330

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

KHC's Compliance Department conducts monitoring reviews on open HOME projects, and open ESG, and HOPWA projects. KHC reserves the right to conduct a compliance review at any time during the term of the HOME, ESG, and HOPWA funding agreements. KHC performs additional monitoring of HOME rental projects every one, two, or three years based on the number of units in the project.

Monitoring reviews cover quality of housing and services, financial statements, recordkeeping and files, and adherence to program policies and procedures as detailed in the regulations for each program (24 CFR Part 92 for HOME projects).

After the monitoring review, subrecipients receive a written response to any issues discovered during the review. These issues are divided into findings (issues which affect program regulations or federal laws) and observations (issues which do not). Subrecipients must respond in writing to all findings within a specified time frame, usually 30 days.

Multifamily projects funded with HOME funds are required to submit annual reports throughout the term of affordability. HOME recipients are also required to submit copies of their audited financial statements, conducted in accordance with the Single Audit Act, if they expend more than $500,000 of federal funds in a fiscal year.

Each year, recipients of HOPWA and ESG funding are required to submit annual reports. They must also submit a copy of their annual report audit (if required) to the Audit staff. In addition to the formal compliance monitoring requirements, KHC program staff overseeing HOPWA and ESG funds will also conduct on-site technical assistance visits to sub-grantees. This will allow for one-on-one training of agency staff as well as allow KHC program staff to do a preliminary review of program policies and expenditures. As a second phase to the on-site technical assistance to the agencies, KHC HOPWA and ESG staff will also conduct random desk reviews of expenditure documentation prior to releasing requested funds. All HOPWA and ESG sub-grantees will have a minimum of one visit and one desk review during the term of their grant; however, KHC reserves the right to perform additional reviews of any program if concerns exist.

DLG is responsible for conducting monitoring review visits on funded CDBG projects. DLG reserves the right to conduct a compliance review at any time during the term of the CDBG grant. The depth and location of the monitoring will depend upon which compliance areas need to be reviewed at that particular point in a project's life cycle. However, a full scope monitoring of all compliance areas will be conducted at least once for each funded activity. The monitoring review includes acquisition and

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relocation (if applicable), environmental, contracts, labor standards, fair housing compliance, and financial review.

After the monitoring review, grantees receive a written response to any issues discussed during the review. These issues will be divided into findings (issues which affect program regulations or federal laws) and recommendations (issues which do not). Grantees must respond in writing to all findings within a specified time frame.

CDBG recipients are also required to submit copies of their audited financial statements, conducted in accordance with the Single Audit Act, if they expend more than $500,000 of federal funds in a fiscal year.

KHC employs a full-time staff member tasked with minority business outreach who travels extensively, reaching out to minority businesses and encouraging participation.

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, CHDO set-aside funds, and contingency funds are not included in allocations to activities. Allocations to activities may change based on need, demand, and other factors.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	23,137,162	0	0	23,137,162	115,000,000	CDBG funding has decreased substantially during the past several years and this trend is expected to continue.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	8,846,758	1,000,000	4,783,650	14,630,408	44,000,000	HOME funding has decreased substantially during the past several years and this trend is expected to continue.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	530,584	0	0	530,584	2,650,000	HOPWA funding has remained relatively stable during the past several years and is based on the number of reported HIV/AIDS cases. During the coming years, an increase in HIV/AIDS cases may be expected due to increased heroin use in this area of the country.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	2,417,145	0	0	2,417,145	12,000,000	ESG funding has increased substantially during the past several years as the program has been revised to include a focus on rapid-rehousing.
Other	public - federal	Multifamily rental new construction Multifamily rental rehab	3,000,000	0	0	3,000,000	12,000,000	Housing Trust Fund, multifamily housing for extremely low-income and very low income households. HTF funding is a new federal resource. The amount of funds available for future allocations may vary.

Table 57 - Expected Resources – Priority Table

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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 continue to 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 our recipients – nonprofits, private developers and units of local government – have contributed a large amount of matching funds with their projects. In fact, in the past, HOME recipients have provided enough matching funds annually to allow the state to carry match forward to future years. In addition, 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.

There are several block grant programs that 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.

For example, KHC encourages all HOME Program applicants match their total HOME request with at least 10 percent of HOME-eligible matching sources, and points awarded to applications may be based in part on matching funds and leverage. 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 to assist in meeting HUD matching requirements to increase the amount of funds available to provide affordable housing.

Each ESG recipient must match the funding provided by ESG with an equal value of contributions from other sources. These funds must be provided after the date of the grant award. In calculating matching funds, 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.

It is anticipated that matching funds will come from a variety of sources, both public and private. Each sub-recipient of ESG funds will be required to match their allocation at a one-to-one level or higher. Because many agencies will be able to use in-kind donations of both goods and

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services as well as cash contributions, it is anticipated that the Kentucky State ESG program will access a sufficient amount of matching funds.

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 Housing Trust Fund (HTF) project applicants. However, because these funds are 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. The amount of non-federal funding associated with most projects will be substantially higher than the amount of HTF funding allocated to the project.

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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, NHTF, and other funding, including state Affordable 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	HOME Homeowner Activities	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing	HOME: $3,000,000	Homeowner Housing Added: 38 Household Housing Unit Homeowner Housing Rehabilitated: 4 Household Housing Unit
2	HOME Rental Assistance	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Rental Assistance	HOME: $750,000	Tenant-based rental assistance / Rapid Rehousing: 172 Households Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	HOME Multifamily Activities	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Acquisition/Rehabilitation of Affordable Housing Rehabilitation of Affordable Housing	HOME: $8,000,000	Rental units constructed: 30 Household Housing Unit Rental units rehabilitated: 30 Household Housing Unit
4	ESG Activities	2015	2019	Homeless	Non-Entitlement Geographic Area	Emergency/Transitional Housing For the Homeless Homelessness Outreach	ESG: $2,417,145	Homeless Person Overnight Shelter: 4000 Persons Assisted Homelessness Prevention: 1000 Persons Assisted Other: 1600 Other
5	HOPWA Activities	2015	2019	Non-Homeless Special Needs	Non-Entitlement Geographic Area	Homelessness Prevention Rental Assistance	HOPWA: $621,480	Tenant-based rental assistance / Rapid Rehousing: 189 Households Assisted Other: 31 Other
6	CDBG Housing	2015	2019	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing	CDBG: $3,100,000	Homeowner Housing Rehabilitated: 41 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	CDBG Economic Development	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Economic Development	CDBG: $4,450,000	Jobs created/retained: 193 Jobs Businesses assisted: 7 Businesses Assisted
8	CDBG Public Facilities	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Facilities	CDBG: $6,600,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 33000 Households Assisted
9	CDBG Services	2015	2019	Recovery Kentucky Services	Non-Entitlement Geographic Area	Public Services	CDBG: $3,100,000	Public service activities other than Low/Moderate Income Housing Benefit: 1100 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	CDBG Public Improvements/Infrastructure	2015	2019	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Improvements/Infrastructure	CDBG: $5,100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 9857 Persons Assisted

Table 58 – Goals Summary

Goal Descriptions

1	**Goal Name**	HOME Homeowner Activities
	Goal Description	
2	**Goal Name**	HOME Rental Assistance
	Goal Description	Funding for this activity is focused on TBRA programs. KHC may allocate additional HOME funds as a contingency for TBRA activities to assist households who have been temporarily displaced due to a disaster or emergency as declared by the governor.
3	**Goal Name**	HOME Multifamily Activities
	Goal Description	Construction, Rehabilitation, Acquisition/Rehab of multifamily units.

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4	**Goal Name**	ESG Activities
	Goal Description	
5	**Goal Name**	HOPWA Activities
	Goal Description	
6	**Goal Name**	CDBG Housing
	Goal Description	
7	**Goal Name**	CDBG Economic Development
	Goal Description	
8	**Goal Name**	CDBG Public Facilities
	Goal Description	
9	**Goal Name**	CDBG Services
	Goal Description	
10	**Goal Name**	CDBG Public Improvements/Infrastructure
	Goal Description	

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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 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 community. In addition, funds awarded to local communities will also address the needs addressed in the state's Consolidated Plan.

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 set-aside, CHDO operating, and HMIS.

Funding Allocation Priorities

	HOME Homeowner Activities (%)	HOME Rental Assistance (%)	HOME Multifamily Activities (%)	ESG Activities (%)	HOPWA Activities (%)	CDBG Housing (%)	CDBG Economic Development (%)	CDBG Public Facilities (%)	CDBG Services (%)	CDBG Public Improvements/Infrastructure (%)	Total (%)
CDBG	0	0	0	0	0	0	0	0	0	0	**0**
HOME	0	0	0	0	0	0	0	0	0	0	**0**
HOPWA	0	0	0	0	0	0	0	0	0	0	**0**
ESG	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 59 – Funding Allocation Priorities

Reason for Allocation Priorities

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Allocation priorities are set based on the state's best understanding of needs and applications that may be recieved.

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

All priorities are considered equal because the plan is a statewide plan.

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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 60 - Distribution Methods by State Program

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

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	Describe the state program addressed by the Method of Distribution.	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 particular development priorities. 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. 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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	All cities and counties in Kentucky are eligible for participation in the CDBG Program with the exception of 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. Applications are reviewed based on the following criteria: need, necessary and reasonable expenditures of funds, and project effectiveness.

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	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	The CDBG Program Guidelines, including detailed information about each eligible activity, are available at: https://kydlgweb.ky.gov/FederalGrants/CDBG_cities.cfm
	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
	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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	Describe how resources will be allocated among funding categories.	• Public Facilities - $6,600,000 • Economic Development - $4,400,000 • Housing - $3,093,047 • Community Projects/Renaissance - $5,100,000 • Public Services (Recovery Kentucky) - $3,100,000 • Community Emergency Relief Fund - TBD based on need • Microenterprise Development - $50,000 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. The Commissioner of DLG reserves the right to adjust the amount and split of funds in case of a natural disaster based on an Emergency Declaration by the Governor. 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.

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	Describe threshold factors and grant size limits.	• Economic Development (Traditional) - $1,000,000 Individual; $2,000,000 Multi-Jurisdiction • Economic Development (Non-Traditional) - $250,000 Individual; $500,000 Multi-Jurisdiction • Microenterprise Development - $50,000 Individual • 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/Renaissance - $500,000 Individual • Community Emergency Relief Fund (CERF)- $100,000 Individual • Public Services (Recovery Kentucky) Existing Facilities - $250,000 • Public Services (Recovery Kentucky) New Facilities - $300,000 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 Microenterprise Development and Public Services (Recovery Kentucky) program areas. 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.

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	What are the outcome measures expected as a result of the method of distribution?	Recipients must acknowledge that they will be required to submit performance measure information to DLG in order 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. 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. Objectives include: • Suitable Living Environment • Decent Housing • Economic Opportunity The next step will be selection of an outcome based upon the purpose of the activity. Outcomes include: • Improved Availability/Accessibility • Improved Affordability • Improved Sustainability 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/Renaissance, Economic Development, Housing, Microenterprise Development, Public Facilities, and Public Services).
2	**State Program Name:**	Emergency Solutions Grant Program
	Funding Sources:	ESG

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Describe the state program addressed by the Method of Distribution.	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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Funds will be awarded using a competitive application process where applicants will be evaluated on such areas as: local needs, applicant experience/capacity, project design, community coordination, and other factors. Applicants will also address Impediments to Fair Housing and how they will address and help eliminate fair housing impediments. Applicant capacity and project design will be most heavily weighted in the scoring criteria. Applications will be ranked based on score and allocations will be made based on applicant ranking and overall request. Because funding priorities have been established for shelter activities and rapid re-housing, KHC reserves the right to fund portions of an applicant's request. ESG Applicants are provided with instructions to access the ESG Interim Rule, HUD's Final Rule on the Homeless Definition, ESG Program Guidelines and a series of ESG application training videos, all made available on KHC's Web site.
	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

OMB Control No: 2506-0117 (exp. 07/31/2015)

	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)	All of Kentucky's allocation must be made available to Balance of State Continuum of Care cities and counties or private nonprofit organizations on a competitive basis. 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 state KHC enters into its funding agreement with HUD. KHC accepts applications from all eligible applicants (including first-time applicants and faith-based groups).
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Describe how resources will be allocated among funding categories.	KHC will be following the HUD recommendations to aggressively fund rapid re-housing activities using Emergency Solutions Grant funds. KHC has designated that a minimum of 36 percent will be dedicated to rapid re-housing activities with the remaining 64 percent available to be used for other eligible activities under street outreach, shelter activities, homeless prevention, HMIS and administration. In an effort to reduce the time that families and individuals remain homeless and shorten the length of stay in the homeless system, it is important to dedicate the resources necessary to achieve those outcomes. By dedicating a large amount of funds to the rapid re-housing component, agencies receiving the funds will be able to target the assistance to those clients with the greatest need. While many communities have traditionally seen great success in utilizing homeless emergency shelters and with homeless prevention programs, there will still be some funds available for use on those activities as well as a small portion expected to be used for HMIS expenses and administrative costs.
	Describe threshold factors and grant size limits.	Previous years allocation levels do **not** guarantee current allocation amounts. No single application may request more than $150,000.00 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. KHC will make every attempt to award limited resources as prudently as possible and will award those agencies with the greatest capacity to effectively administer the funds. The amount of funds awarded will depend on how well a particular application scores. Those applications receiving higher scores will receive awards. Applications with low scores are less likely to receive funding. KHC intends to fund projects based on project viability, applicant capacity 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.

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	What are the outcome measures expected as a result of the method of distribution?	Measures include how KHC will evaluate each ESG service provider's effectiveness in: 1. Targeting those who need the assistance most 2. Reducing the number of people living on the streets or in emergency shelters 3. Shortening the time people spend in homelessness 4. Reducing each program participant's housing barriers or housing stability risks 5. Analyzing Program Outcomes All standards are aligned with the HEARTH Act Performance Standards to be used under each ESG Program Component: • Street Outreach - Reduction in Homelessness; Return to Homelessness; Hard to Serve; Exits to Housing; Length of Stay • Emergency Shelter Activities - Reduction in Homelessness; Length of Stay; Returns to Homelessness; Hard to Serve; At-risk Populations; Exits to Permanent Housing • Homelessness Prevention - Length of Stay; Returns to Homelessness; Hard to Serve; At-Risk Populations; Income Growth; Exits to Permanent Housing • Rapid Re-housing - Reduction in Homelessness; Length of Stay; Returns to Homelessness; Hard to Serve, At-Risk Populations; income Growth; Exits to Permanent Housing • HMIS - Data quality
3	**State Program Name:**	HOME Investment Partnerships Program
	Funding Sources:	HOME

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Describe the state program addressed by the Method of Distribution.	Activities eligible for funding include, but are not limited to: • 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) 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.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Eligibility to apply for HOME funds will be no more restrictive than that required by HUD regulations. Applications may be submitted for homeownership, tenant-based rental assistance and rental activities. Application submission deadlines for federal fiscal year 2015 will be determined and published. Notification that applications are being accepted will be made via KHC's eGram service. Applications will be evaluated on: 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 in order to receive a full release of funds. In the event a recipient has not satisfactorily performed under the terms of the written agreement with KHC or has not initiated a HOME project for which funding was awarded, KHC will not accept subsequent applications. *Plan for determining compliance with the 95 percent median purchase price 92.254(a)(2)(iii):* 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. For newly constructed housing, KHC has further restricted the purchase price/after-rehabilitation value limits to $150,000. 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: HOME Maximum Purchase Price/After-Rehab Value - HUD Exchange

OMB Control No: 2506-0117 (exp. 07/31/2015)

		TBRA applications will be accepted through a competitive application process. When a potential recipient submits a TBRA application, they must document the need for the project by agency data such as waiting lists for assistance.
	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

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Describe how resources will be allocated among funding categories.	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. 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 fiscal year 2015 funds will be distributed approximately as follows: • Homeowner activities, including new construction, rehabilitation, acquisition/rehabilitation/rehab - $3,000,000 • Tenant-Based Rental Assistance - $750,000 • Rental Production/Rehab - $6,000,000 KHC will 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 meet the objectives of the state. 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. CHDO operating funds, administrative funds, CHDO set-aside funds, and disaster contingencies are not included in the above allocations toward eligible activities.

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	Describe threshold factors and grant size limits.	KHC imposed performance based thresholds for HOME funds. Applicants are required to have expended all funds from allocations awarded more than 24 months ago. Additionally, they are required to have committed 100 percent of funds allocated more than 12 months to individual households and expended at least 50 percent of funds allocated more than 12 months ago. KHC reserves the right to allow threshold waivers for extenuating circumstances. In FFY2015, 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, $600,000 for CHDO set-aside activities, or $500,000 non-CHDO single-family activities. KHC will allow eligible applicants to request a maximum of $600,000 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. 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 past performance, current debt obligation to KHC and compliance with past funding. 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 will 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. 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

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		fiscal year. Draw requests for eligible expenditures may be made on a calendar quarter reimbursement basis. Additionally, a portion of this year's HOME allocation will be used for CHDO operating expenses KHC has imposed a maximum subsidy cap of $40,000 per unit for 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 Homeownership Application Guidelines and Scoring Criteria.
	What are the outcome measures expected as a result of the method of distribution?	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. Outcome measures include availability/affordability/accessibility of decent affordable housing.
4	**State Program Name:**	Housing Opportunities for Persons with AIDS
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	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. KHC reserves the right to further restrict any of the HOPWA program guidelines, as approved by HUD.

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	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	HOPWA applications are 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 KHC will make every effort to work with applicants and offer technical assistance when completing an application. It is crucial to evaluate each agency based on various criteria in order to be certain that the funds are being administered according to the guidelines. All criteria listed are scored by a team and awards are based on highest ranked scores.
	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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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	KHC will continue to provide funding for the five Care Coordinator regions within the balance of state. These regions are: • Barren River Region • Cumberland Valley Region • Lexington Region • Northern Kentucky Region • Purchase Region Currently, project sponsors have been administering federal funds, including HOPWA, for several years and have the knowledge and qualifications needed to encourage successful client outcomes.
	Describe how resources will be allocated among funding categories.	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. KHC will continue to allow requests for all eligible categories within the program.
	Describe threshold factors and grant size limits.	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. KHC will utilize carryover funds from prior years and/or recaptured funds as necessary to meet the objectives of the state. Additionally, if necessary, KHC reserves the right to adjust funding levels between these activities as determined by KHC.
	What are the outcome measures expected as a result of the method of distribution?	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. Because the housing portions of STRMU and TBRA are where most of the funds are utilized, the housing results will be most important.

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Discussion:

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

AP-35 Projects – (Optional)

Introduction:

KHC and DLG, as state allocating agencies, do not specify projects to be funded in advance of allocations from HUD. Funds are awarded on a competitive basis after the Action Plan is submitted to HUD.

#	Project Name
1	2015-2018 AIDS Vounteers, Inc KYH151F99 (AVOL)
2	2015-2018 Kentucky Hsg Corp KYH15F999 (KHC)
3	2015-2018 Heartland Cares KYH15F999 (Heartland Cares)
4	2015-2018 Matthew 25 AIDS Services KYH15F999 (Matthew 25)

Table 61 – Project Information

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

AP-38 Project Summary

Project Summary Information

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1	**Project Name**	2015-2018 AIDS Vounteers, Inc KYH151F99 (AVOL)
	Target Area	
	Goals Supported	HOPWA Activities
	Needs Addressed	Rental Assistance Homelessness Prevention
	Funding	HOPWA: $282,167
	Description	provide assistance to clients diagnosed with HIV/AIDS
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	See above
2	**Project Name**	2015-2018 Kentucky Hsg Corp KYH15F999 (KHC)
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOPWA: $15,917
	Description	admin
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Admin
3	**Project Name**	2015-2018 Heartland Cares KYH15F999 (Heartland Cares)
	Target Area	
	Goals Supported	HOPWA Activities
	Needs Addressed	Rental Assistance Other Housing and/or Service Needs
	Funding	HOPWA: $222,500

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	Description	provide assistance to clients diagnosed with HIV/AIDS
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	See above.
4	**Project Name**	2015-2018 Matthew 25 AIDS Services KYH15F999 (Matthew 25)
	Target Area	
	Goals Supported	HOPWA Activities
	Needs Addressed	Rental Assistance Other Housing and/or Service Needs
	Funding	HOPWA: $10,000
	Description	provide assistance to clients diagnosed with HIV/AIDS
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	See above

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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. In light of 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

Eligible applicants must submit a letter to DLG's director of the Office of Federal Grants from the chief executive official requesting an invitation to submit an application. The letter must include a description of the proposed project activities to be undertaken, the National Objective to be met, activities to be financed with specific eligibility citation provided, the public benefit to be derived for the proposed activities, projected time table, total project cost, sources of all funds, and any other pertinent information or documentation to support the request. Applicants are encouraged to meet with DLG staff to discuss potential projects prior to submittal.

DLG will review each letter of request for compliance with federal requirements and state priorities. The request will be reviewed based on criteria set forth in the Program Guidelines. DLG will advise applicants in writing of acceptance for an application to HUD. While there are no standard application forms, elements and items of documentation are required as set forth in the Guidelines. Applications will be submitted at any time during the program year.

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

While DLG has no formal CDBG Community Revitalization Strategy (CRS) as set forth in CPD Notice 97-1, issued on February 4, 1997, DLG is willing to work with communities to get local strategies approved. DLG would require a locality to request to use the CRS prior to submitting an application and their plan must meet the HUD criteria for CRS and be approved by DLG and HUD.

DLG allows communities, within the regular guidelines to carry out various kinds of eligible revitalization activities particularly through the Community Projects program area. Projects such as senior centers, health and wellness centers, slum and blight removal and other community revitalization activities are often done. Many projects include partnerships with funds from other sources and participation of non-project agencies.

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 with the exception of 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. In the FFY2015 program year, KHC may allocate up to $2 million in HOME funds in entitlement jurisdictions to support tax-exempt bond transactions for multifamily housing.

ESG: All of Kentucky's allocation must be made available to Balance of State Continuum of Care cities and counties or private nonprofit organizations on a competitive basis. 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. Funding will be made available as renewal of last fiscal year's funding distributed to five areas of the Commonwealth established for funding distribution by the Cabinet for Health and Family Services. The formula is based on the number of reported persons living with AIDS in each of the regions according to the Kentucky Department for Public Health, Division of Epidemiology and Health Planning.

Eligible applicants for HOPWA funding will submit plans for the use of HOPWA funding to KHC. The plans outline the activities to be undertaken and the process for the use of funding.

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

Geographic Distribution

Target Area	Percentage of Funds
Non-Entitlement Geographic Area	100

Table 62 - Geographic Distribution

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Rationale for the priorities for allocating investments geographically

In general, investments are not allocated geographically.

Discussion

Affordable Housing

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

Introduction:

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

Table 63 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rehab of Existing Units	0
Total	0

Table 64 - One Year Goals for Affordable Housing by Support Type

Discussion:

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

One year goals in include:

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

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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 Rental Assistance 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 remain 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 ultimate 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, 186 families are participating in FSS and 99 of these participants have funds in escrow.

The *Yes You Can…Own A Home* Program, 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.

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

Voucher Programs to allow families housed by local housing authorities the knowledge and qualifications to access KHC's single-family loan programs. In addition, KHC has established a homeownership voucher program that allows qualifying families to use their Housing Choice Voucher

for homeownership.

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

In the event KHC and DLG are notified by HUD that a public housing agency in Kentucky is designated by HUD as “troubled,” KHC and DLG will determine if KHC and DLG 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 has undertaken a multi-pronged approach to eliminating homelessness. Central to this approach is the creation of a state policy-advisory entity, the Kentucky Interagency Council on Homelessness (KICH). KICH is composed of representation from state government, nonprofit and advocacy agencies to collaborate and perform the following functions and duties:

- 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 Homele*ssness 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.

KHC participates in and offers to other agencies that serve the homeless across the state the opportunity to participate in the HUD's Continuum of Care (CoC) Program. Kentucky's CoC is a regional system for helping people who are homeless, or at risk of homelessness, by providing housing and services appropriate to the whole range of homeless needs in the community. Through the CoC program, agencies can serve homeless clients with supportive services, transitional housing, permanent supportive housing or rapid re-housing programs.

KHC's CoC programs are for families and individuals who, in addition to safe, decent and affordable housing, need access to supportive services in order 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 six regions have each developed a plan that identifies dozens of specific strategic recommendations to address local priorities. The following key themes and objectives are apparent across regional boundaries:

- 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

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Information System to document both evolving progress and continuing need.

Develop and carry out a coordinated statewide public education and outreach campaign that establishes the foundation for building public support.

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 was made available across the state.

KHC will continue to work closely with KICH, Continuum of Care agencies and other state agencies 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. The ability for emergency and transitional shelters to work closely with local RRH programs provides a good partnership. Many shelter programs also operate a RRH program within their agency, therefore providing an avenue for clients to move from homelessness to permanent housing while still receiving a continuum of services.

These activities include:

- 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 and by working with the CoC to identify agencies to apply for CoC RRH projects, 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. 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 five VASH programs and three 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.

Activities planned for the coming year to address housing needs of homeless individuals and families and to prevent low-income individuals and families from becoming homeless include the activities listed below.

- Acquisition, construction, renovation, major rehabilitation or conversion of structures for use as transitional and permanent supportive housing for homeless persons.
- Payment of maintenance, operation, rent, repair, security, equipment, insurance, utilities and furnishings of transitional and permanent housing.

KHC is also partnering with HUD to take steps to end veteran homelessness in Kentucky in 2015. KHC has dedicated housing assistance for 100 homeless Kentucky veterans to be available through the new Veterans Emerging Towards Transition (VETT) Program. Through the VETT program, KHC will designate a preference for 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. Through KHC, local service providers will coordinate the completion of certification checklists to be sued as referral tools to qualify

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homeless veterans for the housing assistance.

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 21. A partnership between KHC and CHFS provides up to six months of initial rental assistance plus an additional six months if needed, through the Chafee Room & Board program. Recent HMIS data show that less than one percent of persons in emergency shelter had come from foster care placement. 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 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. Recent HMIS data showed that less than two percent reported hospitals or nursing homes as their prior living situation.

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 vast majority of persons discharged from state psychiatric hospitals return to their own home. KHC partners with the state on two programs specifically targeting this population. KHC's Olmstead housing initiative is expected to assist nearly 100 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

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housing for offenders prior to release. 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 program. The transitional housing has 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 and transitional housing placements when a family member or friend is not available to support the offenders' transition into the community. The Recovery Kentucky program assists persons with addictions. The centers are funded by DLG, KHC, the Department of Corrections, and other funds, and are expected to assist more than 1,000 persons this year. CDBG services funding and KHC rental assistance funding support more than 10 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.

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	189
Tenant-based rental assistance	31
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	220

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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 jurisdiction. 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.
- 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.

Discussion:

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:

Data indicate that there is only one affordable rental housing unit available for every three low-income households needing affordable housing. Units of existing rental housing are being lost due to expiring contracts and affordability periods. During this fiscal year, KHC is undertaking a plan to preserve existing housing including offering financing programs to update and preserve these properties and extend affordability periods, ensuring the housing remains available to low-income households.

In addition, there are currently 2,300 persons with severe mental illness living in personal care homes, of which the state has prioritized 600 who are capable of living in a community-based setting with supportive services. Obstacles that KHC, in partnership with the state Cabinet for Health and Family Services, are addressing include production of permanent supportive housing units, monthly rental assistance payments, housing relocation assistance, and community-based supportive services. KHC's Olmstead initiative has transitioned over 90 individuals to community-based housing. KHC has also applied for HUD Section 811 Project-Based housing vouchers to serve this population.

The state's long-term care facilities and nursing homes are also filled with hundreds of persons who wish to live independently in their communities. This population's obstacles to obtaining community-based housing include the need for financial assistance to transition out of facilities, relocation assistance (both logistical and financial), housing location services, and monthly rental assistance. Kentucky Transitions is a program administered by the state Cabinet for Health and Family Services tasked with transitioning Medicaid-eligible persons from state-run settings to independent living. KHC employs transition coordinators under an agreement with the state who assist person with locating and moving to existing affordable housing in their community of choice.

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 KHC with funding from the state Cabinet for Health and Family Services. The program provides household setup funds and short term rental assistance to assist this population in transitioning from foster care to independence.

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

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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 particular 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, NSP, ESG 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 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

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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 in the course of 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 in an effort 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

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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. Microenterprise development is designated to provide funds to local communities and community-based organizations for the purpose of providing assistance and technical services to low- to moderate-income persons who either currently own a small business or are interested in starting one.

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.

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 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 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 in order 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

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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 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 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 250 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 and perform the following functions and duties: 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 Homeless. 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

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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 also 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:

Program Specific Requirements

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

Introduction:

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.	70.00%

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 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

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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 submitting an application:

- 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.

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 is in the initial phases of establishing the Centralized or Coordinated Assessment System. A committee is in place comprised of representatives from each of the CoC regions as well as staff from KHC, ESG recipients, and HMIS staff. The committee is investigating a three-phase approach that will begin with the roll-out of a 211-type hotline accessible toll-free to the full state. This number will be listed on the CoC Web page and other sites that clients in need of homeless services frequent. The second phase includes a provision under which the HMIS vendor has developed a vulnerability assessment that will aid in prioritizing clients based on their level of need and current physical condition. The third phase includes an eligibility assessment from the HMIS vendor that allows prioritized clients to be quickly linked to the most appropriate housing/services program in their area. Forms for each assessment will be available for completion manually by non-HMIS agencies across the state.

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. Funds will be awarded using a competitive application process where applicants will be evaluated on such areas as: local needs, applicant experience/capacity, project design, community coordination, and other factors. Applicant capacity and project design will be most heavily weighted in the scoring criteria.

   Applications will be ranked based on score and allocations will be made based on applicant ranking and overall request. Because funding priorities have been established for rapid re-housing, KHC reserves the right to fund portions of an applicant's request.

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 is able to 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

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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. These performance measures are attached to this Plan.

Discussion:

Attachments

Citizen Participation Comments

Consultation, Citizen Participation, Public Comments, and Surveys

February 10, 2015 Consolidated Plan, PHA Plan and AI Public Hearing

The public hearing was held at KHC's offices on February 10, 2015 and was advertised in advance via newspaper and eGram service. Twenty-seven persons attended, including 14 KHC staff members and 13 persons representing the public

The public hearing was opened by J. Kathryn Peters, executive director of Kentucky Housing Corporation. Ms. Peters welcomed all in attendance and asked that everyone sign the attendance roster, indicating if they wished to speak. All persons on the agenda for the hearing introduced themselves.

Stacie Sutton, managing director of tenant assistance programs at KHC presented the five-year PHA plan, followed by Karen Quinn, assistant general counsel at KHC, who presented the current Analysis of Impediments to Fair Housing Choice.

Bernie Hillman, policy analyst and grant developer at KHC, discussed the Consolidated Plan process, timelines, and encouraged those in attendance to provide data and comments. In addition, Ms. Hillman noted that the early draft versions of the Needs Assessment and Market Analysis sections, were available on KHC's Web site as well as two active needs surveys. The partner survey is focused on obtaining information from those entities that assist clients in the same socio-economic groups that are eligible for housing and services assistance from KHC's programs as well as other agencies who are interested in coordination of programs. The second survey is focused on obtaining information from the citizens of Kentucky and is available as a direct link and in pdf file form. Partners are encouraged to provide the citizen survey to their clients.

Lynn Littrell, manager of the office of grants with the Department for Local Government, presented information on the CDBG program, including a discussion of CERF and advised that the Section 108 program is still available.

Davey King, managing director of Housing Contract Administration with KHC, discussed the HOME program, including that funding has been drastically reduced over the past few years. Because KHC is discussing how to allocate the limited resources among activities, it is important that partner agencies provide feedback.

Jill House, program specialist with KHC, presented information on the ESG program. Ms. House stated that there will be a continued emphasis on rapid rehousing and that the funding round for ESG would be soon. There is expected to be no significant changes to ESG for the coming fiscal year.

Heather Harvey, program specialist with KHC, presented information on the HOPWA program. Ms. Harvey stated that HOPWA is funded on a three-year continuation cycle and that the program is

currently in the second year of this cycle. The program is expected to change this year to allow short-term housing assistance which can be used to pay for hotel and motel vouchers.

Mary O'Dougherty with the Kentucky Commission Against Domestic Violence (KCADV) spoke in support of KHC continuing to fund the HOME TBRA program, stating that the program is vital in serving families, and allows them to assist those not eligible for a Housing Choice Voucher. Many DV agencies use TBRA as a lynchpin to provide housing when the agency provides supportive services to those with special needs. In a time when the state needs more supportive housing, eliminating TBRA will reduce the number of persons served.

Myralee Smith-Cowley with the Federation of Appalachian Housing Enterprises (FAHE) expressed concern for continued funding for Community Housing Development Organizations (CHDOs). Ms. Cowley stated that CHDO funding allows for increase in capacity, which in turn allows CHDOs to access additional funding. She also urged KHC to coordinate HOME funding with other initiatives serving Appalachia, including SOAR and Promise Zones, including providing additional scoring points for applications serving these areas. Lynn Littrell commented that the CDBG application includes Promise Zones, although there are no points associated, rather applications receive priority and special consideration. Rob Ellis noted that KHC supports SOAR, but may not be able to with HOME funds.

Curtis Stauffer with the Housing and Homeless Coalition of Kentucky (HHCK) provided comment on many item. Mr. Stauffer lauded the job that KHC staff did on the Analysis of Impediments to Fair Housing Choice, including the inclusion of attainable goals. The implementation of the Uniform Landlord Tenant Act statewide was introduced to the state legislature and HHCK is actively working in support of this bill. He also spoke about development capacity, especially non-profit CHDO developers who may not have the capacity to undertake large projects, but who are focused on single family homeownership. Affordable rental housing is a great need, and if CDBG and HOME funds can be used to increase capacity building for non-profit developers who can provide affordable rental housing in certain communities, it would be welcome. Mr. Stauffer was troubled that the initial HOME program application guidelines this year are restricted to applicants who received funding in prior years and felt it was a disincentive for innovation and the development of new partnerships and would hinder development of capacity among other negative effects. He urged DLG to explore using CDBG funds to provide technical assistance and capacity building to designating Community Based Development Organizations (CDBOs) and would like to see it used in conjunction with HOME funding to develop capacity. Mr. Stauffer made mention of the new Housing Trust Fund and how that funding, when it comes, will be used for rental housing for the lowest income households, and would give the flexibility to continue HOME TBRA. He stated that HOME TBRA is one of the few resources available to house homeless persons who are not designated as chronically homeless or disabled – the population that is the focus of CoC funding.

Michael Kociolek with Next Step Network provided comment on the interests of owners of manufactured housing, stating that housing policy in Kentucky must address the needs of this population segment, as it is a critical housing resource in the nation's most impoverished regions and for many low-income homeowners and elderly persons. In rural, high poverty areas, it may be the only viable housing option. Next Step urged that manufactured housing be recognized as an important

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source of unsubsidized housing and that data in the plan differentiate between manufactured housing and boats and RVs. Next Step also requests that the state direct resources in the plan toward policy that supports manufactured housing and manufactured homeowners, including directing HOME and CDBG funds toward replacement of pre-HUD code mobile home replacement. In addition, it was recommended that KHC contribute to both in-kind and financial resources toward the Central Appalachian Mobile Home Research Coalition being led by FAHE and Next Step.

Scott McReynolds with the Housing Development Alliance spoke about the importance of continuing to build CHDO capacity, stating that existing nonprofits are fearful of being able to continue to provide housing. There is a huge need for homeownership and homeowner rehab although they acknowledge that rental preservation is also a need. Mr. McReynolds urged the CDBG program to fund housing in Promise Zones, by providing water and sewer infrastructure first. He stated there is a crisis between the short-term and long-term needs if we don't build new housing to solve the problem. He stated that Census data is good at determining cost burden, but bad at determining actual housing condition. The Census asks questions that drastically understate the number of substandard housing units. Based on his data, there are 7,900 substandard housing units in his service area and 130,000 in Appalachian Kentucky. Homeownership is a high priority for the families in his area – they buy a manufactured home so they can be a homeowner. One-fourth of manufactured housing originations in Kentucky are in his are. Half of those loan originations are likely to be turned down and 19 percent of loans are high-cost loans. Homeownership is needed in his area. Mr. McReynolds summed up his request by stating that 300,000 persons in Appalachian Kentucky live in poverty – pay attention to them. With 500,000 households with incomes less than $25,000 per year, it is very difficult to house them.

Tom Manning-Beavin with Kentucky Highlands Investment Corporation echoed Mr. McReynolds' comments. The housing crisis in Appalachia is difficult to tackle. Homeownership in rural areas is critical culturally and it's scalable more often than multifamily housing. In rural areas, it is easier to manage a 15-unit project than a 150-unit project. In addition, a lot of people who are renters could be homeowners. Homeownership creates a positive economic impact in communities. USDA programs, including the 502 direct loan program, are valuable to housing – however, some programs still require HOME subsidy to make them work. There exists a gap between the appraised value of property and the cost to develop which must be filled. There also continues to be a growing waiting list of those in need. Mr. Manning-Beavin also urged KHC to continue CHDO operating support as existing housing knowledge is in danger of being lost. CHDOs can be the lynchpin that makes things happen in communities.

Blake Enlow with COAP spoke about retaining capacity, stating that staff with his organization are energy experts, BPE and HERZ-certified, and they have created capacity at nonprofits in partnership with KHC and FAHE. He explained that it is hard to develop affordable rental housing in rural areas, especially those serving lower incomes as they do not meet the debt-to-income ratio. Families in rural areas want to stay where they live now and they want to be homeowners. It is less expensive to create single family homes and he believes there must be an emphasis on purchase and rehabilitation of homes. This activity can house persons of lower incomes, and also creates a tax base. Mr. Enlow stated that it is hard to re-establish capacity if nonprofits go away.

Consultation and Comments

During the drafting period for the Consolidated Plan, many emails and letters were received in addition to comments made at the public hearing. Comments were also received in response to a presentation of the Consolidated Planning process at a meeting of the Housing Policy Advisory Committee.

Wilma Kelly with Beattyville Housing and Development Corporation submitted comments in support of the HOME TBRA program as well as asking for funding to operate homeless shelters. Ms. Kelly stated that ESG funding is very competitive and the likelihood of receiving funding is slim. She also stated that they have at least 30 clients on their waiting list for homeowner rehabilitation and it continues to be a high need in her area.

David Kreher with People's Self-Help Housing submitted written comments in support of the TBRA program during the drafting phase and written public comment period for the Consolidated Plan.

Letters and comments in support of the TBRA program and providing needs information during the drafting phase of the Consolidated Plan include:

- Kentucky Coalition Against Domestic Violence
- Lexington-Fayette Urban County Government Office of Homeless Prevention
- Kentucky River Community Care
- Neighborhood Construction and Housing Services
- Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties
- Safe Harbor of Northeast Kentucky
- Mountain Comprehensive Care Center
- Individual letters from five persons served by the TBRA program in eastern Kentucky
- Kentucky Equal Justice Center
- Adanta
- Green House17
- FAHE
- Women's Crisis Center Buffalo Trace
- Gateway Community Action
- Irwin Cutler, Louisville
- DOVES of Gateway
- LKLP Safe House
- Family Life Abuse Center
- Daniel Boone Community Action Agency
- New Beginnings, Bluegrass, Inc.
- Hope's Wings Domestic Violence Program
- Merryman House Domestic Crisis Center
- Hazard Perry County Community Ministries, Inc.
- OASIS, Inc.

- Sandy Valley Abuse Center

Surveys

During the drafting phase of the Consolidated Plan, both KHC and DLG provided the opportunity for citizen participation and agency/government input through online surveys. DLG received more than 200 responses to the CDBG survey, while KHC's partner and citizen surveys received fewer responses.

The Citizen Survey received 68 responses. Most respondents were households without children (34%), non-elderly households (78%), and were homeowners (75%) living in single family detached homes (74%). Those who didn't own their home cited lack of down payment funds (75%), poor credit (50%), and unstable employment (38%) as the top reasons delaying them from purchasing a home. Eighty-five percent of those polled did not have difficulty making their rent or mortgage payment, while 15 percent did, with 6 percent stating they were currently in default of their mortgage or rent payments. Twenty percent stated that the cost of their rent or mortgage payments affected their ability to pay for other personal or household expenses.

When asked about their satisfaction level with their current housing, 39 percent were very satisfied, 44 percent were satisfied but thought there were things that could improve their housing, and 17 percent were not satisfied with their housing. The top housing issues that respondents would change in order to improve their satisfaction are: condition of the home, size of the home, lack of public transportation, lack of quality jobs, community amenities, and privacy.

Nineteen percent of respondents stated that there was a person in their household with special needs, with the highest disability rate being hearing impairment. Several also listed physical mobility problems.

When asked about whether certain types of housing and assistance were needed in their communities, the highest-ranked answers were: energy efficiency improvements (97%), shelters and services for the homeless (89%), help with rent payments (88%), housing for the elderly (85%), emergency housing repairs (86%), handicapped accessibility (86%), and down payment and closing cost assistance (86%). Comments submitted by respondents included concern about the poor condition of owner-occupied housing and lack of affordable rental housing and tenant-based rental assistance.

KHC's partner survey garnered only 32 responses although it was widely promoted. While there didn't seem to be a high response rate to the survey, many partners were actively engaged during the planning process by attending the preservation summit, committee meetings, and the public hearing. Many written comments were received during the months-long planning and drafting process. Respondents to the written survey included nearly every group outlined in the Consolidated Plan consultation guidance:

Housing Developer – 17	Services – Homeless – 9	Services – Elderly Persons – 7	Services – Children – 6
Services – Persons with Disabilities – 5	Services – Education – 5	Services – Fair Housing – 4	Services – Victims of Domestic Violence – 3
Services – Employment – 3	State Government – 3	Local Government – 3	Neighborhood Organization – 2
Community Development Financial Institution - 1	Public Housing Agency – 1	Services – Persons with AIDS – 1	Services – Health – 1
Federal Government – 1	Regional Organization – 1	Business Leaders – 1	Civic Leaders – 1

Many of those who responded were statewide organizations, and many areas of the state were represented by survey responses. When asked about the top three affordable housing activities that should be prioritized to address the most critical needs of households in Kentucky, the prevailing theme included energy efficiency, affordable rental housing/rental assistance, and preservation/rehab of both rental and homeowner housing. When asked about housing cost burden and its rank as compared to other housing problems, 27 percent felt that housing cost burden is the single most important issue, 47 percent believe housing cost burden is a problem, but the condition of housing is a greater problem, and 27 percent felt that the greater issues are that persons are not ready to own a home, accessibility for the aging population is a need, substandard housing is uninsurable or there are high insurance costs and energy costs, and the lack of affordable housing contributes to housing cost burden.

Partners stated that their overall funding has decreased (as has the state's), while the number of clients they are serving has increased over the past few years. Government loans and grants are their top source of funding. The top categories of assistance provided by respondents were rental assistance, homeless services, and counseling/other services (77%); and home purchase, home rehab, and homeless prevention (69%).

Partners were asked to rank the highest rental activity need in their area and the overwhelming highest need was rental assistance (71%). Partners were asked to rank the highest homeowner activity in their area and the highest need was pre-purchase counseling and education (64%). Partners were asked to rate the need for single family rehab activities and the highest need noted was emergency repairs (71%). When asked to rank the need for homeless services, partners listed supportive services (57%) and prevention/rapid rehousing (50%) as highest needs. When asked to rank the need for activities to serve persons with special needs or HIV/AIDS in their areas, they ranked housing for persons with alcohol/drug addiction (69%) and housing for persons with disabilities (62%) as the highest needs.

DLG undertook a survey of local governments and received 268 responses. Community needs were prioritized in this order: economic development (57%), housing (16%), public facilities (16%), and other

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community projects (11%). The highest infrastructure need was road and sidewalk improvements (79%). The highest community project needs were youth activity facilities (55%) and park and recreation facilities (50%). The highest economic development needs were job creation (78%) and infrastructure (58%). The greatest obstacles to addressing needs were lack of funding, jobs, and infrastructure.

Written Comments During 30-Day Comment Period:

David Kreher with People's Self-Help Housing and Tom Manning-Beavin with Southern Tier Housing Corporation and Kentucky Highlands Investment Corporation provided written comments during the 30-day comment period.

Mr. Kreher commended KHC's extra effort to gather statewide input from a wide range of organizations over the past several months. He also raised concerns about KHC's recent focus on preservation and was relieved to see that funding for programs over the next five years as outlined in the plan remains consistent. Mr. Kreher also provided support for the HOME TBRA program, stating that as funding decreases, TBRA becomes more important for tenants. It also guarantees landlords who serve the lowest income populations will receive guaranteed rent as long as the housing continues to meet HQS requirements. TBRA assists families at the lowest income levels and assists those who may not qualify for a Housing Choice Voucher. As federal funding shrinks, low-income households' ability to find affordable housing will become even more dependent on TBRA.

Mr. Manning-Beavin's letter lends support to three programs – development of newly constructed homebuyer units, HOME TBRA, and CHDO operating support. He stated that new construction, especially in rural areas, achieves a triple bottom line – affordable housing, local employment, and additional tax base and stated that these units also leverage financing from the USDA/RHS Section 502 Direct Loan program and noted with leveraging power of this program. He also stated his support of the TBRA program, noting that the Consolidated Plan points out that cost-burden is in high occurrence in Kentucky. Mr. Manning-Beavin also stated his support of the CHDO operating support program, noting that it is an important piece of funding which helps CHDOs do good work in their communities.

There were no comments that were not accepted.

ESG Written Standards 2015 Action Plan

a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG).

The Hearth Act includes new definitions for *At Risk of Homelessness* and *Homelessness* as they pertain to the Emergency Solutions Grants program. Complete definitions are found at §576.2 Definitions.

Sub-recipients must implement written agency policies and procedures to determine client eligibility based on being *At Risk of Homelessness* or *Homeless* as defined by HUD. In addition, sub-recipient policies and procedures must identify acceptable forms of documentation as defined by HUD at §576.500 to accurately document individuals' or families' eligibility for ESG assistance. Sub-recipient policies and procedures must be established in writing and implemented by the sub-recipient to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable KHC and HUD to determine whether ESG requirements are being met.

Homeless status. Sub-recipients must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.

At Risk of Homeless status. For each individual or family who receives ESG Homelessness Prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the sub-recipient.

b. Policies and procedure for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

As part of the program requirements in implementing the Emergency Solutions Grants, sub-recipients must develop, when applicable, policies and procedures for coordination in order to ensure that emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers along with other

homeless assistance providers and mainstream service and housing providers are coordinating their activities with the objective of assisting individuals experiencing housing crisis and/or homelessness to **quickly** regain stability in permanent housing. To comply with the program requirements as defined by HUD at 576.400, sub-recipients must establish written policies and procedures for effective coordination.

Consultation. Sub-recipients must demonstrate through a written document approved by the Continuum of Care (COC) that the award is allocated according to the COC established priorities and policies (percentage use for clients stabilization needs, percentage use for staff salaries, etc). In addition, to demonstrate program performance, the sub-recipient must provide regular reporting through HMIS (or a comparable database for qualifying sub-recipients).

Coordination with other targeted homeless services. Sub-recipients must coordinate with existing homeless services providers and demonstrate to the maximum extent practicable that there is a written process for facilitating client access to other homeless programs as indicated in section 576.400 – b and c. The process must include the establishment of a coordinated assessment at intake that allows rapid referrals.

System and program coordination with mainstream resources. Sub-recipients must establish a coordinated case plan that includes client goals and measurable outcomes. Coordination will also include a needs assessment plan along with a mainstream service eligibility and access plan with existing programs that target youth, individuals and families at risk of homelessness.

Centralized or Coordinated Assessment. Sub-recipients must align the determination of eligibility based upon the definitions of *At risk of Homelessness* or *Homeless* as established by HUD (*576.2*). Any assessment, including screening and/or referral process must be:

- *Consistent* - All assessment, screening and referral protocols are clearly delineated by the COC and reprised in the grant agreement to ensure that it is binding. Sub-recipients will be trained on intake and screening policies before any grant execution.
- *Accurate* - To ensure accuracy of needs assessment, sub-recipients must demonstrate as much as possible that the assessment process is coordinated with other targeted homeless service providers.

As best practice, sub-recipients are encouraged to secure and have on file a Memorandum of Understanding with targeted homeless service providers.

For the purposes of privacy and safety, victim service providers may choose not to use the centralized or coordinated assessment system.

To ensure consistency in providing assistance, each sub-recipient must follow the program component guidelines regarding:

- *Compliance* - All eligibility determination for individuals and families must be based upon HUD definition of *At Risk of Homelessness* or *Homeless* (*576.2)*. All eligibility must be documented according to policies and procedures as defined and established by HUD at 576.500.
- *Consistency* - All intake processes including assessment, screening, and referrals must have been centralized or coordinated to ensure consistency and accuracy. Sub-recipients will document and file all written coordinated assessments to comply with HUD requirements for area-wide systems coordination (Section 576.400 - e).
- *Long-term housing stabilization* - All outreach, emergency shelter assistance, prevention and housing must ensure that eligible individuals or families have a plan for stabilization and a long-term housing solution. The case plan must be written and consistent with the COC's priorities along with a coordinated process that leads to quick transition to permanent housing. The plan will include:
    - Amount of rent (based upon the eligible individual or family income and must not exceed 30 percent of the household's monthly income)
    - Utility costs (based upon the frequency of assistance within a time frame established by existing policies)
    - Length of stay (for a quick transition to stable and permanent housing, eligible individual or family must reside for the shortest possible period (but no more than 24 months) in a sheltered setting that includes both emergency and transitional housing)
    - Recertification and rent adjustments (to ensure long-term housing stabilization, eligible individual or family must demonstrate gained income at end of the stabilization phase; where applicable, eligible individual or family will secure public assistance benefits. Sub-recipient will implement agency policies and procedures to determine appropriate and consistent rental recertification and adjustments.
- *Habitability* - As a best practice, KHC recommends Housing Quality Standards (HQS) inspections. However, habitability inspection is required at a minimum. In addition, sub-recipients must ensure that available housing is safe and secure for households with special needs. Sub-recipients must comply with all federal

requirements as defined in *576.403 Shelter and housing standards*, as applicable.

- *HMIS* – One hundred percent data accuracy and/or zero errors on all applicable reports submissions. Accurate and complete Annual Performance Report. Quarterly Point-In-Time date bed coverage data, resulting in bed coverage that is above 65 percent and less than 105 percent as per HUD standards. Victim Service Provider will use comparable database and will produce unduplicated aggregate data.

c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Sub-recipients must implement written policies and procedures for determining which individuals and families who qualify as *at risk of homelessness* can receive homelessness prevention assistance and which of those individuals and families should be prioritized for that assistance.

Homelessness Prevention Assistance. ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the *homeless* definition in §576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the *at risk of homelessness* definition, <u>or</u> who meet the criteria in paragraph (2), (3), or (4) of the *homeless* definition in §576.2 <u>and</u> have an annual income below 30 percent of median family income for the area, as determined by HUD. Homelessness prevention should only be considered when the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

Sub-recipients must implement policies and procedures to determine client eligibility based on the program participant meeting the *homeless* and/or *at risk of homeless* definitions at §576.2. In addition, the policies and procedures must outline how the subrecipient will determine the program participant's household income does not exceed 30 percent of median family income for the area as determined by HUD.

Sub-recipients must implement written policies and procedures to ensure that homelessness prevention assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into

other permanent housing and achieve stability in that housing. In the event that the sub-recipient determines that homelessness prevention assistance could not help the program participant regain stability in permanent housing, the policies and procedures must ensure the program participant is informed that they do not qualify for assistance for this reason.

Sub-recipients must implement written procedures to outline what type of homelessness prevention assistance the program participant is qualified to receive and in what order of priority.

- Eligible homelessness prevention assistance:
    - Housing relocation and stabilization services requirements in §576.105
    - Short-term and medium-term rental assistance requirements in §576.106

At Risk of Homeless status. For each individual or family who receives ESG Homelessness Prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's *at risk of homelessness* status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the subrecipient.

Annual Income status. For each individual or family who receives ESG Homelessness Prevention assistance, the record must include documentation that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii)of the definition of *at risk of homelessness* in §576.2

Rapid Re-Housing Assistance. ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium- term rental assistance necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium- term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

Sub-recipients must implement policies and procedures to determine client eligibility to receive rapid re-housing assistance. An individual or family's ability to sustain housing should not be a threshold requirement. The written policies and procedures should identify how the program participant will receive services to overcome their immediate

housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-recipients must implement written policies and procedures to ensure that rapid re-housing assistance is necessary to help the program participant move as quickly as possible into permanent housing and achieve stability in that housing. In the event that the sub-recipient determines that rapid re-housing assistance could not help the program participant achieve stability in permanent housing, the policies and procedures must ensure the program participant is informed that they do not qualify for assistance for this reason.

Rapid re-housing assistance should be targeted to program participants who are closest to going into a shelter, car, or the street, if not those who are about to spend their first night there (referred to as "diversion"). Written policies and procedures should identify an effective targeting policy to prioritize those most in need of quickly moving into permanent housing as those being eligible to receive rapid re-housing assistance. Sub-recipients should ensure that their program priorities are consistent with the goals of the state plan to end homelessness and the Federal Strategic Plan.

Sub-recipients must implement written procedures to outline what type of rapid re-housing assistance the program participant is qualified to receive and in what order of priority. Policies and procedures must include standards of determining the type, amount, and duration of housing stabilization and/or relocation service to provide to the program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

- Eligible rapid re-housing assistance:
  - Housing relocation and stabilization services requirements in §576.105
  - Short-term and medium-term rental assistance requirements in §576.106

d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.

The homelessness prevention and rapid re-housing assistance components allow caps and conditions to be set by the subrecipient agency as they pertain to short- and medium-term rental assistance at §576.106 (b). In the event that the subrecipient elects to set caps and/or conditions to the type of assistance being provided, they must be outlined in the agency's written policies and procedures and must apply to all program participants.

Sub-recipients may set a maximum amount or percentage of rental assistance that a program participant may receive a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. Sub-recipients may also require program participants to share in the costs of rent; however, the program participant should never be required to contribute more than thirty percent of the household income toward the cost of rent.

If the amount of assistance will be based on a percentage of the program participant's income, the policies and procedures must specify what the percentage will be used and how the income will be calculated. Under no circumstances should the percentage of the participant's income contributed toward rent exceed thirty percent of the household's monthly income.

e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

As part of the program requirements in implementing the Emergency Solutions Grants, the sub-recipients must develop consistent standards for determining the duration, the provision and the adjustment of rental assistance.

Prevention . ESG assistance funds may be used to provide housing relocation and stabilization services and short- and /or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place not meant for human habitation (see homeless definition 576.2). This type of assistance is referred to as *prevention* (see 576.103).

Sub-recipients must establish consistent standards regarding:
Eligibility - All determination of homeless prevention must meet the criteria under the *at risk of homelessness* definition which must be appropriately documented. All documentation must demonstrate that the assistance to an individual or family is necessary to help regain stability in the participant's current home. All participants must

have an annual income at or below 30 percent of area median income for the area as defined by HUD (see 576.105)

Duration of assistance - All short-term rental assistance must not exceed three (3) months of rent during any 24-month period.

Discretional capping/conditions – Sub-recipients must establish written policies that clearly state the maximum amount or percentage of rental assistance as well as the number of months that a program participant may receive assistance (*see 576.106b*). All rental assistance must not exceed the Fair Market Rent (FMR) established by HUD, as provided under *24 CFR part 888* and comply with HUD's standard of rent reasonableness as defined under *24 CFR 982.507*

Rental adjustment – Sub-recipients must re-evaluate the eligibility of the program participant and the amounts of assistance once every three months. All re-evaluation must be documented and establish that the program participant does not have an annual income that exceeds 30 percent of area median income. For the purposes of re-evaluation of eligibility, sub-recipients must document any changes in the program participant income or other circumstances such as changes in the participant's household composition.

Rapid re-housing. ESG assistance funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to help a homeless individual or family to move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing, may be provided to program participants who meet the criteria under the definition of homelessness (see homeless definition as defined by HUD under 576.2) Sub-recipients must establish consistent standards regarding the provision of this type of assistance (see 576.105 housing relocation and stabilization services).

Eligibility. All documentation must demonstrate that the assistance to an individual or family meet the definition of homelessness as defined by HUD. All participants must have an annual income at or below 30 percent of area median income as defined by HUD (see 576.105).

Duration of assistance. Eligible participants will be provided with no more than 24 months of rental assistance during any three-year period. Sub-recipients must establish written policies and procedures around this provision. If caps and/or conditions are applied, the written policies must clearly state the maximum amount or percentage of rental assistance as well as the number of months that a program participant may

receive assistance (*see 576.106b*). All rental assistance must not exceed the FMR established by HUD, as provided under *24 CFR part 888* and comply with HUD's standard of rent reasonableness as defined under *24 CFR 982.507.* Sub-recipients must ensure that all program recipients receiving project-based rental assistance must have a one-year lease regardless of the length of the rental assistance.

Rental adjustment. Sub-recipients must re-evaluate the eligibility of the program participant and the amount of assistance annually. All re-evaluations must be documented in writing and establish that the program participant does not have an annual income that exceeds 30 percent of area median income. For the purposes of re-evaluation of eligibility, sub-recipients must document any changes in the program participant income or other circumstances such as changes in the participant's household composition.

f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

Under housing relocation and stabilization services, financial assistance and services costs are subject to the general conditions under (576.103 and 576.104)

Housing relocation and stabilization services for homelessness prevention

Rental application fees. Must be based on the sub-recipient's written policies and must be in compliance with HUD requirements. All rental application fee assistance to eligible individuals or family program participants must be appropriately documented. *See 576.105 (1).*

Security deposits. Must be in compliance with HUD requirements. All deposits must be equal to no more than two months' FMR-based rent, appropriately documented and must have been calculated in the program participant's rental assistance. *See 576.105 (2).*

Last month's rent. Must be based on the sub-recipient's written policies and must be in compliance with HUD requirements. When last month's rent assistance is provided, it must not exceed one month of FMR-based rent, appropriately documented and must

have been calculated in the program participant's total rental assistance which cannot exceed three months during any 24-month period. *See 576.105 (3).*

Utility deposits. Must be in compliance with HUD requirements. All utility deposit payments to eligible program participants shall not exceed more than three months within any 24-month period. *See 576.105 (4).*

Utility Payments. Must be in compliance with HUD requirements. All utility payments to determined eligible program participant shall not exceed more than three months within any 24-month period. Eligible utility services include gas, electric, water and sewage. *See 576.105 (5).*
Moving Costs. Must be in compliance with HUD requirements. All moving costs must be executed with consistency based upon the sub-recipient's written and documented policies. Eligible moving costs are truck rental, hiring a moving company, etc. In the case of the payment of temporary storage fees, no more than three months' payments are allowed. Eligible participants must have accrued the determined fees after the date of entry in the program and before entry in permanent housing. Payment of arrearages is not an eligible expense.

Housing search and placement. For all housing search and placement activities, sub-recipients must include: assessment of housing barriers, needs and preferences; development of an action plan for locating housing; housing search; outreach to and negotiation with owner; assistance with submitting rental applications and understanding leases; assessment of housing to ensure compliance with ESG requirements for habitability, lead-based and rent reasonableness; assistance with obtaining utilities and making moving arrangements; tenant counseling.

Housing stability case management - Must be in compliance with HUD requirements and must include all required activities to ensure and maintain stability in permanent housing. Permanent housing search and placement services cannot exceed 30 days. If the program participant is living in permanent housing, any housing stability case management activity cannot exceed 24 months.

To evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance, sub-recipients must use the centralized or coordinated assessment system (see 576.400(d)). Sub-recipients must include in all required initial evaluation (576.401(a)) a verification of eligibility of all individuals and families applying for homelessness prevention or rapid re-housing. All verification must be appropriately documented.

Other activities include counseling, developing, securing, coordinating and obtaining Federal, State and local benefits. Sub-recipients must also establish a system for monitoring and evaluating program participant progress. In addition, sub-recipients must establish a process for information sharing and referrals, developing an individualized housing and service plan for obtaining permanent housing and stability and a plan for conducting re-evaluation. (See 576.4019(b)).

Mediation. Sub-recipients must establish written policies and procedures that state clearly the terms of the mediation and all parties involved (program participant and the landlord). All documentations must establish that mediation was made necessary to prevent the loss of permanent housing in which the program participant resides and/or is the current lease holder.

Legal services. Sub-recipients must establish written policies and procedures that state clearly the terms of the legal services. All documentation must establish that the services were made necessary to resolve legal issues that prohibit the program participant from obtaining permanent housing or prevent the loss of permanent housing in which the program participant resides.

Credit repair. Sub-recipients must establish written policies and procedures based upon HUD's requirements. All documentation must establish that the services were made necessary to assist program participants to build critical skills related to budgeting, money management, accessing a free personal credit report and resolving legal issues that prohibit the program participant from obtaining permanent housing or prevent the loss of permanent housing in which the program participant resides. Debt payment and debt modification are not eligible services.

Housing relocation and stabilization services for rapid re-housing

Rental application fees. Sub-recipients must have established written policies determining the provision of this assistance. The policies must be in compliance with HUD requirements. All rental application fee assistance to eligible individual or family program participants must be appropriately documented. *See 576.105 (1).*

Security deposits. Must be in compliance with HUD requirements. All deposits must be equal to no more than 2 months' FMR based rent, appropriately documented and must have been calculated in the program participant's rental assistance. *See 576.105 (2).*

Last month's rent. Must be based on sub-recipient written policies and must be in compliance with HUD requirements. When last month's rent assistance is provided, it

must not exceed one month FMR-based rent, appropriately documented and must have been calculated in the program participant's total rental assistance which cannot exceed 24 months in any three-year period. *See 576.105 (3).*

Utility deposits. Must be in compliance with HUD requirements. All utility deposit payments to eligible program participants shall not exceed 24 months within any three-year period. *See 576.105 (4).*

Utility Payments. Must be in compliance with HUD requirements. All utility payments to eligible program participants shall not exceed more than 24 months within any three-year period. If needed, sub-recipients can make up to six months of utility payment arrearages per program participant. A partial payment of a utility bill must be considered as one month's assistance. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water and sewage. *See 576.105 (5).*

Moving Costs. Must be in compliance with HUD requirements. All moving costs must be executed consistent with sub-recipient written and documented policies. Eligible moving costs are truck rental, hiring a moving company, etc. In case of the payment of temporary storage fees, payments up to three months' costs are eligible. Eligible participants must have accrued the determined fees after the date of entry in the program and before entry in permanent housing. The payment of arrearages is not eligible.

Housing search and placement. For all housing search and placement activities, sub-recipients must include: assessment of housing barriers, needs and preferences; development of an action plan for locating housing; housing search; outreach to and negotiation with owner; assistance with submitting rental applications and understanding leases; assessment of housing to ensure compliance with ESG requirements for habitability, lead-based and rent reasonableness; assistance with obtaining utilities and making moving arrangements; tenant counseling.

Housing stability case management. Must be in compliance with HUD requirements and must include all required activities to ensure and maintain stability in permanent housing. Permanent housing search and placement assistance cannot exceed 30 days. If the program participant is living in permanent housing, any housing stability case management activity cannot exceed 24 months.

Performance Standards

Measures include how KHC will evaluate each ESG service provider's effectiveness in:

A. Targeting those who need the assistance most,
B. Reducing the number of people living on the streets or in emergency shelters
C. Shortening the time people spend in homelessness
D. Reducing each program participant's housing barriers or housing stability risks.
E. Analyzing Program Outcomes

All standards are aligned with the HEARTH Act standards

HOME Program Recapture Provisions

HOME funds are administered by Recipient Agencies statewide. Recipient Agencies will advise clients prior to committing HOME funds that Recapture Provisions will apply. KHC requires Recipient Agencies to utilize Recapture Provisions for any application that is received through the competitive funding process and the GAP pool. The HOME funding agreement, which is executed with each Recipient Agency, contains the following language:

Recapture Provisions -

All Recipient Agencies receiving an allocation of HOME funds to undertake homebuyer activities will be required to utilize the recapture provision as described by the HOME regulations at *24 CFR 92.254(a)(ii)(A)(2) - Reduction During the Affordability Period*. This provision will be enforced by including appropriate language in the HOME written agreement with the homebuyer, mortgage documents, and lien documents. The initial homebuyer must reside in the home as his/her principal residence for the duration of the period of affordability.

In the event the homebuyer transfers the property, either voluntarily or involuntarily, during the period of affordability, KHC or the Recipient Agency recaptures all or a portion of the "direct" HOME assistance provided to the homebuyer from the available net proceeds.

The direct HOME assistance is the total amount of HOME assistance that enables the buyer to purchase the unit, including: downpayment and closing cost assistance, interest subsidies, and other assistance provided directly to the homebuyer (e.g., soft second mortgage), and if applicable, the amount that reduces the purchase price from fair market value to an affordable price.

The portion recaptured by KHC or the Recipient Agency will be a pro-rata amount if the direct HOME assistance. The total amount of the loan will be reduced for each year that the owner occupies the unit. For instance, for each year of a five-year affordability period, one-fifth of the amount of the HOME assistance will be forgiven.

To make the determination of what is forgiven:

(Number of years the buyer occupied the home/period of affordability) X total amount of direct HOME assistance originally provided to the homebuyer = amount forgiven.

Total amount of direct HOME assistance – the amount forgiven = Recapture Amount.

In the event net proceeds of the sale are insufficient to repay the amount owed, recaptured funds will be equal to net proceeds, and the loan will be considered satisfied. Net proceeds are defined as the sales price of the home minus superior loan repayment (not including HOME loans) and any closing costs.

The recapture provision is in effect for a period of affordability that is based on the amount of direct HOME assistance to the buyer, as follows:

Amount of Direct Assistance to Buyer	Period of Affordability
Under $15,000	5 years
$15,000 to $40,000	10 years
Over $40,000	15 years

Recapture Example - Ms. Mary Smith purchases a home for $105,000 in June of 2011 and received $20,000 in direct HOME assistance from ABC nonprofit (who is a Recipient Agency using HOME funds from KHC). Ms. Smith sells the house in August 2016, after the fifth year of affordability. As a result, 50 percent of her loan is forgiven and a balance of $10,000 is to be repaid from the net proceeds. However, if the net proceeds of the sale are insufficient to repay the balance, the amount subject to recapture will be equal to the net proceeds.

Noncompliance

During the affordability period, noncompliance occurs when an owner (1) vacates the property or rents the property to another household, or (2) sells the home without KHC receiving recaptured funds due at time of sale. KHC will monitor its homebuyer properties at least annually to confirm that owners continue to reside in the units as their principal residence. In the event of noncompliance, the owner is subject to repay any outstanding HOME funds invested in the housing. This is based on the total amount of HOME funds invested, including both development funds and direct subsidy to the buyer minus any HOME loan repayments.

Appendix - Alternate/Local Data Sources

1	**Data Source Name** Survey Data
	List the name of the organization or individual who originated the data set. KHC and DLG
	Provide a brief summary of the data set. Online surveys were provided for completion by citizens, local governments, agencies, and other interested parties.
	What was the purpose for developing this data set? To provide needs information and comments.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Statewide
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Consolidated Plan drafting phase
	What is the status of the data set (complete, in progress, or planned)? Complete
2	**Data Source Name** Balance of State CoC Facilities Data
	List the name of the organization or individual who originated the data set. Kentucky Housing Corporation
	Provide a brief summary of the data set. Housing inventory data from the Balance of State CoC.
	What was the purpose for developing this data set? Also used for the CoC application
	Provide the year (and optionally month, or month and day) for when the data was collected. 2014
	Briefly describe the methodology for the data collection. All available homeless beds

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	Describe the total population from which the sample was taken. Shelters, transitional housing, permanent housing
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. All CoC units
3	**Data Source Name** HOPWA CAPER Reports
	List the name of the organization or individual who originated the data set. Kentucky Housing Corporation
	Provide a brief summary of the data set. Data from the 2013 CAPER Reports, HOPWA Formula Funding, NonEntitlement
	What was the purpose for developing this data set? CAPER reports as required annually by HUD
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Persons with HIV/AIDS assisted under the nonentitlement formula Kentucky allocation of HOPWA
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? FY2013
	What is the status of the data set (complete, in progress, or planned)? Complete

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