

Expected Resources

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

Introduction

In addition to newly allocated block grant funds, estimates of program income and recaptured funds from prior years are included in each year's allocation plan. Please note there is no Program Income expected for CDBG, HOPWA, ESG, HTF, and "Other - RHP".

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	26,514,357	0	0	26,514,357	106,057,428	DLG expects to provide funding to projects in non-entitlement areas of the state. Priorities including; CDBG Housing, Public Services, Economic Development, and Other Housing and/or Service Needs

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	13,850,006	489,147	9,845,511	24,184,664	55,400,024	Grant from U.S. Department of Housing and Urban Development to address affordable housing needs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	891,658	0	0	891,658	3,566,632	Grant from U.S. Department of Housing and Urban Development dedicated to the housing needs of people living with HIV/AIDS.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,574,466	0	1	2,574,467	10,297,864	Grant from U.S. Department of Housing and Urban Development to address needs and services for persons experiencing homelessness or persons at risk of homelessness.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,152,170	0	2,700,000	5,852,170	12,608,680	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.
Other	public - federal	Other	1,116,000	0	0	1,116,000	4,464,000	Grant from U.S. Department of Housing and Urban Development to help individuals in recovery from a substance use disorder become stably housed.

Table 1 - Expected Resources – Priority Table

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

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

Cities and Counties may contribute public land to a CDBG project.

Discussion

Continued information about match requirements:

In general, CDBG applicants receive higher priority for funding if they provide matching funds. Kentucky's CDBG Small Cities Small Program is fortunate that the majority of recipients contribute some amount of matching funds. Guidelines for the Recovery Housing program are in a development stage.

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.

Finally, The Commonwealth of Kentucky adheres to the match requirements for CDBG, HOME and ESG. The match requirements by program are as follows:

- CDBG: After the first \$100,000, the Commonwealth matches, dollar for dollar, all eligible administrative expenses. CDBG administrative expenses for program year 20 are anticipated at \$895,430.
- HOME: HOME funds are used in conjunction with the Commonwealth's Affordable Housing Trust Fund Dollars, which are anticipated to be \$7,165,104 for program year 2020, exceeding the \$3,462,502 HOME match requirement.
- ESG: Funds are matched in an amount that equals the fiscal year grant amount for ESG. For program year 2020 the total ESG match is \$2,574,466.

These match practices will be continued through the duration of the 2020 to 2024 Consolidated Planning period.

KHC is the designated administrator of the federal Low-Income Housing Tax Credit (LIHTC) program, governed by Section 42 of the Internal Revenue Code of 1986, as amended (Code), and all Treasury regulations, for the Commonwealth of Kentucky. This program is coordinated with HOME and other funding, including state Affordable Housing Trust Fund, National Housing Trust Fund and KHC Housing Assistance Funds to produce and rehabilitate the maximum number of affordable rental units possible. Entities applying for tax credits apply for other forms of funding/financing through KHC by way of a consolidated application.

Additional affordable housing and economic development programs are currently 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:

- Kentucky Small Business Development Centers
- Kentucky 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	2020	2024	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing	HOME: \$3,322,721	Homeowner Housing Added: 45 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit
2	HOME Rental Assistance	2020	2024	Affordable Housing	Non-Entitlement Geographic Area	Rental Assistance Permanent Supportive Housing	HOME: \$1,661,360	Tenant-based rental assistance / Rapid Rehousing: 240 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	HOME Multifamily Activities	2020	2024	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing Permanent Supportive Housing	HOME: \$8,860,589	Rental units constructed: 24 Household Housing Unit Rental units rehabilitated: 20 Household Housing Unit
4	Emergency Shelter Grant Activities	2020	2024	Homeless	Non-Entitlement Geographic Area	Rental Assistance Permanent Supportive Housing Rapid-Rehousing Emergency Shelter Homelessness Outreach Prevention of Homelessness Other Housing and/or Service Needs	ESG: \$2,574,466	Tenant-based rental assistance / Rapid Rehousing: 850 Households Assisted Homeless Person Overnight Shelter: 4200 Persons Assisted Homelessness Prevention: 500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	HOPWA Activities	2020	2024	Non-Homeless Special Needs	Non-Entitlement Geographic Area	Rental Assistance Other Housing and/or Service Needs	HOPWA: \$891,658	Tenant-based rental assistance / Rapid Rehousing: 35 Households Assisted Other: 360 Other
6	CDBG Housing	2020	2024	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing Homebuyer Rehabilitation and Development	CDBG: \$2,900,000	Homeowner Housing Rehabilitated: 30 Household Housing Unit
7	CDBG Economic Development	2020	2024	Non-Housing Community Development	Non-Entitlement Geographic Area	Economic Development	CDBG: \$5,532,783	Businesses assisted: 7 Businesses Assisted
8	CDBG Public Facilities	2020	2024	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Facilities Other Housing and/or Service Needs	CDBG: \$5,793,503	Other: 35000 Other
9	CDBG Services	2020	2024	Recovery Kentucky Services	Non-Entitlement Geographic Area	Public Services	CDBG: \$3,100,000	Other: 1100 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	CDBG Public Improvements/Infrastructure	2020	2024	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Improvements/Infrastructure	CDBG: \$8,292,309	Other: 30000 Other
11	Housing Trust Fund Multifamily Activities	2020	2024	Non-Housing Community Development	Statewide	Rehabilitation of Affordable Housing	HTF: \$3,152,170	Rental units rehabilitated: 24 Household Housing Unit

Table 2 – 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
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	Emergency Shelter Grant 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 childcare, 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	To improve local economies and the economic well-being of the people of Kentucky while protecting the environment. Encourage private investment that will result in the creation of new jobs, primarily for the unemployed and underemployed. Discourage the out migration of businesses that employ and serve the local population.
8	Goal Name	CDBG Public Facilities
	Goal Description	To improve the quality of life through funding community projects requested by individual communities to enhance community pride and involvement and perpetuate local identity. Enable local communities to provide services they have determined are important but generally cannot afford. Foster a revitalization of community structure to help communities help themselves. Promote energy efficiency in new construction and rehabilitation projects especially the use of Energy Star qualified products.

9	Goal Name	CDBG Services
	Goal Description	To improve the lives of citizens by helping them overcome chemical addictions and avoid the risk of homelessness. Provide operational costs to support new and existing residential substance abuse centers. Provide support to educational programs for at-risk or LMI persons with substance abuse issues.
10	Goal Name	CDBG Public Improvements/Infrastructure
	Goal Description	To provide public facilities to eliminate conditions which are detrimental to the public health and safety and which thus detract from further community development or which are necessary to meet other essential community needs. Improve existing public facilities. Provide new facilities when warranted by recent population growth or when essential needs exist.
11	Goal Name	Housing Trust Fund Multifamily Activities
	Goal Description	New construction or rehab of affordable rental properties.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Kentucky's block grant funds will be distributed throughout the state on a competitive basis for eligible activities through several methods described in the individual program guidelines for each program. Units of local government, nonprofit and for-profit entities will be able to apply for funding to carry out eligible activities. This distribution system allows eligible agencies to apply for funding for activities that will address the priority needs for their local community, as housing and community development needs vary widely across Kentucky. In addition, funds awarded to local communities will also address the needs addressed in the state's Consolidated Plan. In addition to local community needs, DLG and KHC have identified the following needs that will be addressed with funding via Kentucky's formula allocation funds: the need to increase the supply of affordable homeownership and rental units; the need to preserve the existing supply of subsidized rental units; the need to identify permanent housing solutions for persons experiencing homelessness; the need to support local government's efforts to increase their job/tax base, improve and expand public facilities, and offer services tailored to local needs. The allocation distribution in the table below is an estimate. Depending upon the types of applications received, DLG and KHC may reallocate funding between eligible activities. The distribution in the table below does not include administrative costs, contingencies for disasters, CHDO operating, and HMIS. CHDO set-aside has been included in homeowner activities, although CHDOs are eligible to apply for funding for all activities.

Funding Allocation Priorities

	HOME Homeowner Activities (%)	HOME Rental Assistance (%)	HOME Multifamily Activities (%)	Emergency Shelter Grant Activities (%)	HOPWA Activities (%)	CDBG Housing (%)	CDBG Economic Development (%)	CDBG Public Facilities (%)	CDBG Services (%)	CDBG Public Improvements/Infrastructure (%)	Housing Trust Fund Multifamily Activities (%)
CDBG	0	0	0	0	0	11	24	22	12	31	0
HOME	24	12	64	0	0	0	0	0	0	0	0
HOPWA	0	0	0	0	100	0	0	0	0	0	0
ESG	0	0	0	100	0	0	0	0	0	0	0
HTF	0	0	0	0	0	0	0	0	0	0	100
Other RHP	0	0	0	0	0	0	0	0	0	0	0

Table 3 – Funding Allocation Priorities

Reason for Allocation Priorities

Housing priorities are considered equal.

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

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

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

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

CDBG Housing (11% of CDBG); CDBG Economic Development (24% of CDBG); CDBG Public Facilities (22% of CDBG); CDBG Services (12% of CDBG); CDBG Public Improvements/Infrastructure (31% of CDBG) - CDBG distributions seeks to optimize the impact of CDBG funds across the Balance of State and to address demand across priorities that far outstrips available CDBG.

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

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

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 4 - Distribution Methods by State Program

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

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The HUD CDBG Program provides assistance to communities for use in revitalizing neighborhoods, expanding affordable housing and economic opportunities, assisting with community emergency relief, providing infrastructure, improving community facilities, and providing operational costs for Recovery Kentucky substance abuse centers. With the participation of their citizens, communities can devote these funds to a wide range of activities that best serve their own development priorities. 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.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>All cities and counties in Kentucky are eligible for participation in the CDBG Program except for the cities of Ashland, Bowling Green, Covington, Elizabethtown, Henderson, Hopkinsville, Owensboro, the City of Lexington/Fayette County and City of Louisville/Jefferson County Metro Government which receive a direct allocation of CDBG funds from the federal government. Applications are reviewed based on the following criteria: need, necessary and reasonable expenditures of funds, and project effectiveness.</p>

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The CDBG Program Guidelines, including detailed information about each eligible activity, are available at: https://kydlgweb.ky.gov/FederalGrants/CDBG_cities.cfm.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<ul style="list-style-type: none"> • Public Facilities - \$8,292,309 • Economic Development - \$5,532,783 • Housing - \$2,900,000 • Community Projects - \$5,793,503 • Public Services (Recovery Kentucky) - \$3,100,000 • Community Emergency Relief Fund - TBD based on need

<p>Describe threshold factors and grant size limits.</p>	<ul style="list-style-type: none"> • Economic Development (Traditional) - \$1,000,000 Individual; \$2,000,000 Multi-Jurisdiction • Economic Development (Non-Traditional) - \$250,000 Individual; \$500,000 Multi-Jurisdiction • Public Facilities - \$1,000,000 Individual; \$2,000,000 Multi-Jurisdiction • Self-Help - \$250,000 Individual; \$500,000 Multi-Jurisdiction • Housing - \$1,000,000 Individual • Community Projects - \$500,000 Individual • Community Emergency Relief Fund (CERF)- Determined on need • Public Services (Recovery Kentucky) Existing Facilities - \$200,000 • Public Services (Recovery Kentucky) New Facilities - \$300,000
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Recipients must acknowledge that they will be required to submit performance measure information to DLG to meet this reporting requirement. As part of this process, each recipient will be required to complete a Program Completion Report at closeout. Some recipients, due to the nature of their projects (housing rehab and job creation), will report annually. There are three main components of the Performance Measurement System: Objectives, Outcomes and Indicators. Each component relates to a project activity. DLG will assign one of three objectives related to the type of activity, funding source and goal/program intent.</p> <p>Objectives include:</p> <ul style="list-style-type: none"> • Suitable Living Environment • Decent Housing • Economic Opportunity • Improved Availability/Accessibility • Improved Affordability • Improved Sustainability

2	State Program Name:	Emergency Solutions Grant Program
	Funding Sources:	ESG
	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.	In 2017, KHC implemented a new process whereby annual ESG funding would be awarded through a competitive application process every two years. KHC will again use a competitive two-year funding round to award 2019 and 2020 ESG funds. Applicants selected for funding through the 2019 competition will be eligible for renewal in 2020, assuming funds are available. Applicants will be evaluated on such areas as: local needs, applicant experience/capacity/performance, project design, community coordination, and other factors. Recipients receiving renewal funding in 2019 and 2020 will be required to address Impediments to Fair Housing and how they will address and help eliminate fair housing impediments. In 2019, KHC will most heavily consider an applicant’s capacity, project design, and community collaboration efforts. In the event recipients funded in 2019 elect not to renew funding in 2020 or if the 2020 allocation is larger than the 2019 allocation, KHC reserves the right to award excess funds proportionately to the remaining renewal projects or to other special initiatives, such as Coordinated Entry, to meet Continuum of Care established goals and objectives.
	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

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

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

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The distribution of funds is intended to allow partners to most effectively make progress towards the CoC’s goal of homelessness being rare, brief, and non-recurring in the Balance of State. The primary outcomes KHC will monitor will be those established by HUD as part of the CoC System Performance Measures that are relevant to ESG programs, which includes:</p> <ul style="list-style-type: none"> • Reduction in the average and median length of time persons remain homeless; • Reduction in the percent of persons who return to homelessness; • Reduction in the number of persons who are homeless; • Number of persons who become homeless for the first time; • Successful placement from Street Outreach; and • Successful placement in or retention of Permanent Housing
3	<p>State Program Name:</p>	HOME Investment Partnerships Program
	<p>Funding Sources:</p>	HOME
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Possible activities eligible for funding include, but are not limited to:</p> <ul style="list-style-type: none"> • Rehabilitation for homeowner, home buyer or rental properties • Acquisition, including down payment and closing cost assistance • New construction or preservation of rental or home buyer properties • Tenant-based rental assistance • Demolition in conjunction with rehabilitation or new construction • Reconstruction housing • Adaptive reuse • Homeless assistance (restricted to housing development activities for transitional or permanent housing, and tenant-based rental assistance

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Eligibility to apply for HOME funds will be no more restrictive than that required by HUD regulations. In addition to meeting basic eligibility criteria, additional minimum threshold requirements may be set by KHC during each funding round. These thresholds will be outlined in specific funding round application guidelines. Applications may be submitted for homeownership, tenant-based rental assistance and rental activities. Announcements of funding availability will be announced via KHC's eGram web service. Applications may be evaluated on factors such as: performance measures; project need/demand; financial design and feasibility; project design; capacity of the development team; and readiness to proceed. KHC will make every effort to work with applicants and offer technical assistance when completing an application. After an application is given a conditional commitment of funding, the applicant must submit necessary technical submission items to receive a full release of funds. In the event a recipient has not satisfactorily performed under the terms of a prior written agreement with KHC, KHC reserves the right to not accept subsequent applications. 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. KHC will fully comply with the 95 percent median purchase price limits established annually by HUD. 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.</p>
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>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 FFY2019 funds will be distributed approximately as follows (as of the date of publication for comment, HUD had not announced funding):</p> <ul style="list-style-type: none"> • Homeowner activities, including new construction, rehabilitation, and acquisition/rehabilitation/resale - \$4,000,000. This includes CHDO set-aside funds. • Tenant-Based Rental Assistance - \$1,750,000 • Rental Production/Rehab - \$7,000,000.

<p>Describe threshold factors and grant size limits.</p>	<p>KHC imposed performance-based thresholds for HOME funds. Applicants will be required to meet annually-established expenditure and commitment thresholds as spelled out in application guidelines prior to application submission. In FFY2019, KHC will allow eligible applicants to request up to \$500,000 of HOME funds for multifamily activities unless the project was preapproved for additional funding, and \$400,000 for single-family activities. KHC will allow eligible applicants to request a maximum of \$400,000 of HOME funds during an application round. The amount may decrease depending on the amount of available HOME funds. KHC may impose a smaller amount for first time applicants, or applicants with limited experience. KHC may allow higher amounts for multifamily projects utilizing tax-exempt bonds or based on the size and complexity of projects. In addition, KHC reserves the right to allow single-family and TBRA activities to request higher amounts if it is necessary to fully distribute HOME funding. Additionally, KHC will review the capacity of applicants and may require applicants for HOME funds to meet a minimum capacity score to be eligible for funding. Consideration will be given to factors such as past performance, current debt obligation to KHC and compliance with past funding. KHC will reserve a minimum of 15 percent of the total amount of HOME funds received for Community Housing Development Organizations (CHDOs). CHDOs apply to KHC to develop, sponsor or own projects and will be eligible to undertake any eligible activity in accordance with 24 CFR Part 92 Subpart G. Due to the extensive network of nonprofit housing providers in the state, KHC anticipates that the annual participation of CHDOs will exceed 15 percent of total HOME funds. To apply for funds from the CHDO set-aside, an organization must be eligible to be a CHDO. KHC does not accept certifications of other participating jurisdictions. KHC will evaluate the performance of any eligible organization wishing to receive CHDO designation at the time of application. If the organization is successful in the application process and is deemed a CHDO, CHDO operating funds may be awarded. CHDO operating funds will be provided on a year-by-year basis provided funds are available and the CHDO has demonstrated acceptable performance. To document its performance and be eligible to receive operating funds, the CHDO must provide semi-annual progress reports. CHDO operating funds are awarded on a yearly basis coinciding with KHC's fiscal year. Draw requests for eligible expenditures may be made on a calendar quarter reimbursement. KHC has imposed a maximum direct homebuyer subsidy cap of \$40,000 per unit for and a maximum development gap subsidy cap of \$25,000 for HOME-funded homeownership activities. However, KHC reserves the right to allow subrecipients to exceed this maximum with prior written approval. All HOME funds used for homeownership activities will</p>
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		<p>be required at a minimum to meet the HOME affordability period as established in 24 Part 92.254. Additional guidance on maximum subsidy cap and affordability periods will be detailed in the 2019 Single Family Development and AHTF Home Repair NOFA Competitive Application Guidelines Scoring Criteria as well as the KHC 2019 KHC Single-Family Homebuyer Development Policy Manual.</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>KHC anticipates that due to the capacity and threshold requirements, there may be fewer applicants for funding, but by increasing the allocation amounts, applicants with greater capacity will be awarded funds. This will also allow KHC to meet newly imposed expenditure deadlines imposed with the new HOME regulations in effect after August 23, 2013. Outcome measures include availability/affordability/accessibility of decent affordable housing.</p>
4	<p>State Program Name:</p>	<p>Housing Opportunities for Persons with AIDS</p>
	<p>Funding Sources:</p>	<p>HOPWA</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Any activity that qualifies under the HOPWA federal program rules may be awarded by KHC through the federally funded state HOPWA Program, provided it is consistent with the Consolidated Plan and this Action Plan. Activities eligible for funding include Tenant-Based Rental Assistance; Short-Term Rent, Mortgage, and/or Utilities; Supportive Services; Resource Identification; Housing Information Services; Permanent Housing Placement; and Administrative Fees. KHC reserves the right to further restrict any of the HOPWA program guidelines, as approved by HUD.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The 2020 allocation of HOPWA formula funding will be awarded to current HOPWA subrecipients through a renewal process. KHC typically makes funds available every three years through a competitive application process. The last competitive application round was in 2017. Projects selected for funding in 2017 were eligible for renewal in 2018 and 2019. While 2020 would normally be a competition year, it will instead be a renewal year and KHC will hold a competition in 2021 instead. This will reduce the administrative burden on KHC and subrecipients during COVID-19 challenges, which will allow all entities more time to focus on CARES Act funding requirements. During the 2017 competition, applicants were reviewed based on project need and agency experience. 2020 funds will be distributed among the three current subrecipients based on current expenditure rates.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>As described earlier in this section relating to the how funds are allocated and the criteria used to select project sponsors, KHC utilizes a competitive application process every three years that is open to all eligible applicants, including grassroots faith-based organizations and other community-based organizations. To be eligible to apply for funding, an organization need only meet the eligibility criteria established by HOPWA statute and regulations. KHC advertises the availability of applications on its website and notifies the public via electronic newsletters. One of the three organizations currently funded with HOPWA funds and eligible for renewal through the 2019 allocation is Matthew 25 AIDS Services, which was established by the Zion United Church of Christ in Henderson, KY.</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>While KHC has not established minimum or maximum funding amounts by category, in general, most agencies request the largest amount of funding for STRMU, TBRA, and services. Housing assistance in the form of long- and short-term rent subsidies continues to be in high demand in all areas of the state.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>At this time, threshold limits are not restricted. The amount of funds allocated for each activity will be based on the nature of applications received by KHC. KHC will make every attempt to distribute funds geographically, contingent upon overall application submission scoring. KHC will utilize carryover funds from prior years and/or recaptured funds as necessary to meet the objectives of the state.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>HOPWA programs will be evaluated based on the outcome measures currently identified in the HUD 40110-D CAPER (Housing Status at program exit, reduced risk of homelessness and access to care and support), with emphasis on housing status at program exit. Because the housing portions of STRMU and TBRA are where most of the funds are utilized, the housing results will be most important.</p>
5	<p>State Program Name:</p>	<p>National Housing Trust Fund</p>
	<p>Funding Sources:</p>	<p>HTF</p>

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

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

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

AP-35 Projects – (Optional)

Introduction:

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

#	Project Name

Table 5 – Project Information

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

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. Allocation priorities, over the past few years, remain mostly the same as the allocation percentages relate to the number of applications received and amounts requested over time. If there are emergencies, the Commissioner of DLG has authority to move funds from other program areas at any time in an amount required to address the needs. Depending upon the types of applications received, DLG may reallocate funding between eligible activities.

AP-38 Project Summary
Project Summary Information

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

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

Yes

Available Grant Amounts

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

Acceptance process of applications

Applicants must submit an original and one (1) copy of a program specific project application. Activities described in the application are reviewed to determine if they meet the fundability criteria as established in the Housing and Community Development Act. Project activities must meet one of the three National Objectives as referenced in Section II. CDBG program staff review applications and prepare a project summary/review. Staff submit their summary to a review committee designated by the Commissioner. The committee will meet and evaluate projects based on the review criteria and staff comments. The committee will determine approval, rejection, or deferral. In the event demand exceeds the amount of funds available, those projects with the greatest need and effectiveness are for funding.

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

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

Yes

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

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

AP-50 Geographic Distribution – 91.320(f)

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

CDBG: Statewide, Excluding Entitlement cities/areas. 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.

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 across the state. HOPWA funding application awards have been very consistent for several years with funding reaching the entire state. HOPWA-funded agencies cover large service areas, which allows for all counties within KHC's balance of state to be covered by HOPWA funding. A competitive application will be conducted in Spring 2020 to allocate HOPWA funds on a 3-year renewable basis.

HTF: Based upon demand for available funds, KHC will make every effort to ensure that the HTF funds are disbursed geographically.

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

Geographic Distribution

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

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Annual Action Plan
2020

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

Not applicable for CDBG funding.

Discussion

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

Affordable Housing

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

Introduction:

ESG shelter activities are included in the rental assistance goal.

One Year Goals for the Number of Households to be Supported	
Homeless	5,050
Non-Homeless	500
Special-Needs	150
Total	5,700

Table 7 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	1,125
The Production of New Units	69
Rehab of Existing Units	55
Acquisition of Existing Units	0
Total	1,249

Table 8 - 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 Tenant-Based 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.

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

Introduction:

The KHC Tenant Assistance Program (TAP) does not manage any public housing. The TAP continues to administer the Housing Choice Voucher (HCV) Program in areas of the state that are not served by a local public housing authority (PHA). KHC aggressively pursues any new voucher funding opportunities in order to add to the current capacity of the HCV program.

As of December 2019, TAP served 4,445 households through housing choice vouchers, including project-based vouchers. Of households served, several were for designated special populations: 75 Mainstream 5; 350 Non-Elderly Disabled; 43 VASH.

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 TAP is striving to increase HCV leasing to 100% utilization during 2020. The HCV team plans to work through the current waiting list applicants in order to increase offers of assistance. The high volume of voucher offers will result in the need to open the waiting list for a timeframe longer than in past years. KHC will increase outreach to potential owners to maintain an adequate supply of affordable housing for the HCV program.

KHC has been actively working with local PHA's as they pursue repositioning under HUD's Rental Assistance Demonstration (RAD) Program. KHC has encouraged the use of tax-exempt bond financing to assist with the RAD conversion process and have included preferences for PHA's pursuing RAD in recent Notification of Application of Funding (NOFA) opportunities.

KHC, through its Housing Choice Voucher program available in 87 counties, created the Kentucky Moving On initiative in 2017. The program is a partnership with the Kentucky Balance of State Continuum of Care whereby persons currently in CoC-funded permanent supportive housing units who are no longer in need of intensive case management and supportive services may transition out of the PSH-funded resource into a Housing Choice Voucher within the community. The program allows people who have achieved housing stability to transition into community-based housing and frees up limited PSH resources for persons with more severe needs, such as those experiencing chronic homelessness. Additionally, in 2019, KHC was also awarded 200 Mainstream Vouchers that can serve households with a non-elderly member with a disability. It is anticipated these vouchers can serve many persons experiencing or who have experienced homelessness in need of a permanent housing subsidy.

In 2019, KHC's Housing Choice Voucher program was also awarded 74 new Family Unification Program

vouchers to assist transition-age youth and families. The program can assist the following two household types:

- Families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child(ren) in out-of-home care or the delay in returning child(ren) to the family from out-of-home care. (No time limit on assistance for FUP families.)
- Youth 18-24 years of age who left foster care, or will leave foster care within 90 days, in accordance with a transition plan and are homeless or are at risk of becoming homeless. (Maximum of 36 months.)

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

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.

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

KHC, as the balance of state PHA, is currently designated as troubled as the result of an unsuccessful attempt to outsource program management to a private vendor. KHC has brought its Housing Choice Voucher Program back in-house and is supporting the program financially via net revenue realized from other programs and lines of business.

Discussion:

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

Introduction

The state has undertaken a multi-pronged approach to ensure that homelessness is rare, brief, and non-recurring. 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 Homelessness to ensure that accountability and results are consistent with the plan.
- Serve as a state clearinghouse for information on services and housing options for the homeless. Conduct other activities as appropriate.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

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

KHC will continue to work closely with KICH, CoC and ESG agencies, other state agencies, and other service providers to increase coordination of efforts to maximize limited resources focused on homeless and special needs populations in the following areas:

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

Addressing the emergency shelter and transitional housing needs of homeless persons

While the ESG funding application places a priority on Rapid Rehousing (RRH), programs serving both individuals and families with children, KHC is still allowing a large portion of the allocation to be requested and used in the Emergency Shelter Component. Since the BoS CoC is largely rural, there are very little, if any, resources available within communities to address the needs of people when they experience a crisis necessitating a temporary housing solution, which is why the ESG program is so critical to Kentucky’s homeless response system. Through coordinated entry, emergency shelters are working closely with permanent housing providers to move people as quickly as possible out of the crisis response system and into permanent housing. The KY BoS has been aligning its funding priorities with those expressed by HUD in recent years. One area that HUD has emphasized is reallocating funding from transitional housing programs to permanent housing. After this most recent CoC competitive funding round, the KY BoS CoC has no more stand-alone transitional housing projects funded, only new Joint Component awards. Over the past several years, our traditional transitional housing programs reallocated their resources to either permanent supportive housing or rapid rehousing. The KY BoS CoC still values transitional housing as an option for clients, especially programs for youth, persons in recovery, or survivors of domestic violence. There are other transitional housing options funded with resources besides CoC or ESG within the state that may be more appropriate for some people experiencing homelessness, such as substance use recovery programs or transitional housing programs for veterans.

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

In both the 2018 and 2019 CoC competitions,, the KY BoS CoC was also awarded funding through the Domestic Violence (DV) Bonus set-aside for two new projects. These projects are specifically for individuals and families with children that are victims of domestic violence, dating violence, and sexual violence and who are experiencing homelessness.

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

- Provision of essential services to homeless individuals and families. This includes services

concerned with employment, health, drug abuse, education, transportation and staff salaries necessary to provide these services.

- Provision of rental assistance for homeless individuals and families.
- Working closely with the Cabinet for Health and Family Services to ensure persons in need of services have access to them.

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

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

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

KHC, through its Housing Choice Voucher program available in 87 counties, created the Kentucky Moving On initiative in 2017. The program is a partnership with the Kentucky Balance of State Continuum of Care whereby persons currently in CoC-funded permanent supportive housing units who

are no longer in need of intensive case management and supportive services may transition out of the PSH-funded resource into a Housing Choice Voucher within the community. The program allows people who have achieved housing stability to transition into community-based housing and frees up limited PSH resources for persons with more severe needs, such as those experiencing chronic homelessness. Additionally, in 2019, KHC was also awarded 200 Mainstream Vouchers that can serve households with a non-elderly member with a disability. It is anticipated these vouchers can serve many persons experiencing or who have experienced homelessness in need of a permanent housing subsidy.

Please refer to the Appendix in AD-25 for the remainder of this narrative and more details on KHC's HCV program.

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. 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 requires that hospitals must have in effect a discharge planning process that applies to all patients. The evaluation process includes determining an appropriate discharge site. A very small percentage of persons exiting health-care facilities are discharged to homeless programs. The State has established a policy to prevent individuals with serious mental illness from being discharged into homelessness. Instead, the policy requires discharge from inpatient psychiatric hospital settings and other facilities to permanent community-based housing. Facility staff collaborate with family members, guardians, service providers and others to ensure that discharge planning begins upon admission, that the individual's preferences are honored through person-centered

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

The Department of Corrections' discharge policy and procedures ensure every effort to secure safe housing for offenders prior to release from incarceration. The first option is to determine if the individual can return to his/her home; then to consider housing options with family or friends. Many offenders recognize that returning home may not allow them to be successful, and they choose to secure a home placement in a transitional living facility. The transitional housing may have specific requirements and seeks to assist the offender in his/her reentry process. Offenders typically return to home placements with family or friends. The Department of Corrections works directly with contracted halfway houses (re-entry centers) when a family member or friend is not available to support the offenders' transition into the community. The Recovery Kentucky program assists persons who have substance abuse dependencies. The recovery centers are funded by the Department of Local Government, Kentucky Housing Corporation, the Department of Corrections, and other community funds and are expected to assist more than 1,400 persons this year. Community Development Block Grant (CDBG) funds provides program services funding and KHC rental assistance funding supports 13 Recovery centers across the state.

Discussion

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

HOME and HTF funds may be awarded to projects serving special needs and/or homeless 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	120
Tenant-based rental assistance	35
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	155

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

- Continue to promote and market the “Simply Home” exhibit to municipalities and institutions across Kentucky as a vehicle for fair housing education and outreach.
- Continue to collaborate with the Kentucky Commission on Human Rights and Lexington Fair Housing Council, Inc. to expand education and outreach efforts and to identify gaps in need of additional efforts.
- Continue to allocate LIHTC funding to projects that prioritize higher opportunity areas and avoid concentrations of affordable housing.
- Evaluate tools and methods to connect people to housing, such as housing service locator tools.

Discussion:

KHC will continue its efforts to create and expand housing opportunities in light of the above referenced barriers. It will attempt to do so through education and funding.

With respect to the Simply Home exhibit, KHC curated it to showcase the faces of affordable housing and how affordable housing creates good neighbors. Organizations serving partner and public audiences may request this exhibit for showings in an accessible place by the public. Civic organizations, libraries, museums, and other places that can accommodate the floor space for the 24-foot by 34-foot exhibit and consider the 4-foot accessibility for compliance with ADA are great showcases for the exhibit. KHC staff will deliver and set up the exhibit onsite, free of charge, as a service to the Commonwealth. This educational effort serves in part to reduce resistance to affordable housing.

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

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

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

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

Actions planned to foster and maintain affordable housing

The Consolidated Plan addresses a variety of needs for affordable housing and community development that were derived from input at local levels across the state and utilizing housing data. The plan represents a wide array of needs. While one community may need rental housing production at a specific site, another community may need homeowner rehabilitation over a scattered site. For the state to address its community needs, the block grant programs need a level of flexibility for eligible activities to be undertaken. The state will support any application for funding under both federal and private sources that will assist the state in meeting any category of need for affordable housing and community development. The Housing Policy Advisory Committee consists of 10 ex officio state government members, 17 at-large members appointed by the chairman of the Board of Directors of KHC, a member of the Senate and a member of the House of Representatives. The advisory committee

submits an annual report of activities and recommendations to the governor. The Housing Policy Advisory Committee includes numerous subcommittees, including a data subcommittee. This subcommittee reviews needs data annually and makes recommendations to KHC on priorities, which are considered when drafting each annual action plan.

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

Actions planned to reduce lead-based paint hazards

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

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

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

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

Actions planned to reduce the number of poverty-level families

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

Long-term anti-poverty CDBG objectives include:

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

Actions planned to develop institutional structure

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

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

- KHC administers Housing Choice Voucher Program funds in counties where there is no local

housing authority.

- KHC works directly with HUD in the administration of the Risk-Sharing Program to increase the number of safe, decent and affordable rental units throughout the state. When funding is available, KHC processes and underwrites the loan applications and, in the event of default, the mortgage insurance risk is shared between KHC and HUD.
- The Governor's Local Issues Conference is held annually and is attended by local officials from cities and counties throughout the Commonwealth.
- The annual Kentucky Affordable Housing Conference will be attended by representatives of various housing and related service organizations.
- KHC and DLG work with the Recovery Kentucky Task Force that advocates for substance abuse recovery services through long-term supportive housing, recovery programs aimed at addressing homelessness and recovery from addiction within the commonwealth.
- KHC coordinates the state's Housing Policy Advisory Committee and participates on the Kentucky Interagency Council on Homelessness.
- KHC works with nonprofit organizations across the state through the various programs offered at KHC.
- Many private housing developers utilize the Housing Credit Program and HTF program as well as other federal and state housing programs for the development of affordable rental housing across the state. Likewise, KHC continues to maintain relationships with several private developers who utilize HOME funds to provide homeownership opportunities for low-income Kentuckians.
- KHC works with over 120 private lending institutions in the origination and processing of KHC mortgages. The statewide lender network enables lower income families the opportunities to access KHC's loan products.

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

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

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

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

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

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

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

Discussion:

Continued from above: Recipients of federal funds from DLG and KHC are required to adhere to federal Section 3 regulations that provide economic opportunity to low-income residents of the neighborhoods affected by the project and businesses owned by persons of low income. KHC's multifamily production programs include incentives to de-concentrate poverty for new construction projects. The state's Analysis of Impediments to Fair Housing discusses de-concentrating poverty as well. KHC's housing choice voucher program is adapting materials in the briefing process to educate families about seeking housing that is not in a racial or ethnic area of concentrated poverty or concentrated area of housing vouchers.

Program Specific Requirements

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

Introduction:

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.	0.00%

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 be provided to private developers, nonprofit organizations, CHDOs, and governmental agencies.

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

- A description of the form of investment;
 - Justification for the need for the form of investment; and
 - A description of the proposed means of securing the investment, if any. KHC will not permit other forms of investment without prior HUD approval.
 - For homebuyer activities: Households earning at/below 80% AMI and with non-home assets below \$50,000.
 - For rental activities: Households earning at/below 60% AMI and, when HOME is allocated along with Tax-Exempt Bond financing, projects that will preserve rent-restricted and/or rent-assisted multifamily properties. KHC will permit HOME-assisted homebuyer units to be acquired via lease-purchase as allowed under 24 CFR 92.254(a)(7).
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

See the HOME Recapture Provisions attached to this Action Plan.

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

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

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

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

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

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

ESG Written Standards are attached to this plan.

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

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

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

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

In 2019, KHC used a two-year competitive funding process whereby applicants awarded ESG formula funding in 2019 will be eligible for renewal in 2020. Applications were ranked based on score and allocations will be made based on applicant ranking, overall request, and expenditure rates from the 2017 and 2018 allocations.

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

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR

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

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

5. Describe performance standards for evaluating ESG.

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

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

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

Applications submitted by eligible recipients

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

N/A

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

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

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

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

Application submissions will be in response to the 2021 Tax-Exempt Bond Notice of Funding Availability and/or 2021 Low Income Housing Tax Credit (LIHTC) application round (and any successor notice if NHTF funds remain unallocated). Notification that applications are being accepted will be made via KHC's eGram service.

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

Respondents must meet the requirements of the 2021-2022 Qualified Allocation Plan (QAP) located at: <http://www.kyhousing.org/Development/Multifamily/Pages/Applications-Guidelines-Scoring.aspx>

Projects utilizing tax-exempt bond financing must engage an attorney or attorneys who can demonstrate a comprehensive understanding of legal and procedural issues related to bond issuances and KHC's general bond policies and procedures. Applicants must present a project timeline demonstrating the ability to close on all funds requested, including the bond transaction, within the timeframe set forth in the Notice of Funding Availability. Bond funds will only be available to projects that have not yet received or applied for an allocation of Tax-Exempt Bonds.

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

Application submissions will be in response to the 2021 Low Income Housing Tax Credit (LIHTC) Funding Round or through a Tax-Exempt Bond Notification of Funding. Notification that applications are being

accepted will be made via KHC's eGram service. The development team information received will be reviewed to ensure the development team has the capacity and financial strength to develop, construct and manage an LIHTC or tax-exempt bond project. Projects will also need to meet market absorption and market capture rate requirements as outlined in <http://www.kyhousing.org/Development/Multifamily/Documents/MarketStudyRequirements.pdf>.

The required documentation received with each Tax-Exempt Bond NOFA response will be reviewed and evaluated for completeness, accuracy and detail. After all NOFA responses have been reviewed, KHC's credit committee will meet to discuss and prioritize each response according to the number of funding preferences the proposed project will meet. Projects which will address most of the preferences will be invited to submit a full application until all available KHC funds have been allocated. Preferences include, but are not limited to; equitable geographic distribution of KHC resources, projects with some form of rental assistance, projects repositioning under HUD's Rental Assistance Demonstration (RAD) Program, projects who submitted a 9% Low Income Housing Tax Credit application to KHC and were rerouted to utilize tax-exempt bond financing, and innovative projects addressing the affordable housing needs of the commonwealth.

The 2021 LIHTC application is competitive. Projects scoring the greatest number of points in their pool will be awarded first. Ten percent of the annual allocation will be awarded first to projects in which a nonprofit is materially participating as defined in Section 469 of the IRC. In addition to the housing credits allocated, successful applicants may be funded from other available sources for multifamily housing, including HOME and state Affordable Housing Trust Fund. KHC's credit committee reviews final scoring prior to award announcements.

To see a full breakdown of applicant scoring please see the 2021-2022 Qualified Allocation Plan located at: <http://www.kyhousing.org/Development/Multifamily/Documents/2021-2022%20Qualified%20Allocation%20Plan.pdf>

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

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

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

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

LIHTC projects must place in service no later than the close of the second calendar year following the calendar year in which the allocation is made in accordance with IRC Section 42(h)(1)(E)(i).

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

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

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

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

A thorough review of the project's underwriting is completed prior to the funding award, which includes a review of a proposed 30-year proforma. KHC's underwriting model requires an appropriate vacancy rate, DCR requirements, cash flow requirements, and required reserve for replacement deposits to ensure the long-term sustainability and financial feasibility for every project.

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

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

Application submissions will be in response to the 2021 Low Income Housing Tax Credit (LIHTC) Funding Round or through a Tax-Exempt Bond Notification of Funding. The preferences or scoring criteria for each of these funding rounds compliments KHC's Overarching Strategies, which are updated annually. One of KHC's 2021 Overarching Strategies is to provide holistic housing solutions by using data and analytics to shape policy and decision making. The 2021-2022 Qualified Allocation Plan uses data in many scoring items, including the percentage of units in the proposed development as compared to the number of units in the county (supply), the percentage of households at or below 60% AMI in the county (demand) and scores from Enterprise's Opportunity 360 tool on Housing Stability, Education, and Economic Security.

Another KHC 2021 Overarching Strategy is to align our programs, resources, and partnerships for optimal impact. KHC understands the backlog of capital improvements in public housing throughout the Commonwealth, so a preference for projects repositioning under HUD's Rental Assistance Demonstration (RAD) Program has been included in the Tax-Exempt Bond Notification of Funding Availability.

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

Application submissions will be in response to the 2021 Low Income Housing Tax Credit (LIHTC) Funding Round or through a Tax-Exempt Bond Notification of Funding. A substantial amount of private equity is created from the investors buying the credits and borrowers buying the bonds.

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

Yes

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

Yes

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

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.

Enter or attach the grantee’s maximum per-unit development subsidy limits for housing assisted with HTF funds.

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

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

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

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

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

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

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

There is no maximum award amount associated with this program.

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

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

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

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

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

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-

time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

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

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

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

N/A

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

N/A

Discussion:

HOPWA Specific:

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

HOUSING TRUST FUND ADDITIONAL INFORMATION:

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

- 0 Bedroom - \$147,074
- 1 Bedroom - \$168,600
- 2 Bedroom - \$205,018
- 3 Bedroom – \$265,229
- 4+ Bedroom – \$291,137
- Lead-Based Paint – pages 46, 51-53, 70
- Accessibility – page 109
- Disaster Mitigation – state building codes address earthquake resistant construction in higher risk zones; pages 30 and 46 of Multifamily Guidelines address flood plain
- State and local Codes, Ordinances, and Zoning Requirements – Minimum Design requires compliance with State and Local codes. Page 109 of Multifamily Guidelines addresses building codes; zoning is addressed on pages 26, 47, and 50
- Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing – page 96
- Capital Needs Assessment – pages 30, 46, 91, 92, and 109-111 of Multifamily Guidelines address PCNA assessments and reserve accounts