

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	25,988,523.00	0.00	0.00	25,988,523.00	103,954,092.00	DLG expects to fund projects in non-entitlement areas of the state. Priorities include

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	12,173,105.26	116,337.78	0.00	12,289,443.04	52,692,421.04	HOME funds address affordable housing needs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	
			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	1,442,662.00	0.00	0.00	1,442,662.00	5,770,648.00	Grant from U.S. Department of Housing and Urban I

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	
			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	2,666,606.00	0.00	0.00	2,666,606.00	10,666,424.00	Grant from U.S. Department of Housing and Urban I

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	
			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	3,134,373.20	0.00	0.00	3,134,373.20	12,537,492.80	Housing Trust Fund, multifamily housing for extremely low income

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

Federal funds will be leveraged with other resources to achieve the objectives of this plan. Matching requirements will be achieved through a variety of methods. Kentucky is fortunate in that most of our recipients—nonprofits, private developers, and units of local government—have contributed a large amount of matching funds with their projects. In the past, HOME, Affordable Housing Trust Fund, and Rural Housing Trust Fund recipients have provided enough matching funds annually to allow the state to carry match forward to future years. In addition, KHC will continue to provide matching funds, if needed. Periodically, the amount of HOME matching funds required is reduced due to high unemployment rates, natural disasters, or other factors determined by HUD.

There are several block grant programs that are allocated by the state through a competitive system. This system provides an incentive for applicants to include leverage and matching funds in the project that count toward federal match requirements. Some programs award points to applicants that propose more than the required leverage and matching funds. This encourages applicants to blend funds with other programs to provide for affordable housing opportunities. Other programs require a set amount of proposed match or leverage to be eligible for funding. For example, KHC encourages all HOME Program applicants match their total HOME request with at least 10 percent of HOME-eligible matching sources, and points awarded to applications may be based in part on matching funds and leverage. Applicants are also encouraged to contribute additional funds to their project, including, but not limited to, bank loans and other state and federal grants and loans.

KHC and DLG encourage applicants to utilize several sources of funds from the private sector, state programs and local programs to assist in meeting HUD matching requirements to increase the amount of funds available to provide affordable housing.

Each ESG recipient must match the funding provided by ESG with an equal value of contributions from other sources. These funds must be provided after the date of the grant award. In calculating matching funds, recipients may include the value of any donated material or building, the value of the lease of a building, staff salaries paid by the grantee and volunteer time. The recipient may not include funds used to match any previous ESG grant or any other grant. It is anticipated that matching funds will come from a variety of sources, both public and private. Each sub-recipient of ESG funds will be required to match their allocation at a one-to-one level or higher. Since many agencies can use in-kind donations of both goods and services as well as cash contributions, the Kentucky State ESG program may access enough matching funds.

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

In general, CDBG applicants receive higher priority for funding if they provide matching funds. Kentucky's CDBG Small Cities Small Program is fortunate that most recipients contribute some amount of matching funds.

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 most recipients contribute some amount of matching funds. Guidelines for the Recovery Housing program are in progress. There is no matching funds requirement for National HTF (NHTF) 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 higher than the amount of HTF funding allocated to the project.

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.

HOME: HOME funds are used in conjunction with the Commonwealth's Affordable Housing Trust Fund and Rural Housing Trust Fund dollars. KHC also tracks other eligible match sources allowed by program regulations.

ESG: Funds are matched in an amount that equals the fiscal year grant amount for ESG.

These match practices will be continued through the duration of the 2025 to 2029 Consolidated Planning period.

KHC is the designated administrator of the federal 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, state Rural 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 and financing through KHC by way of a consolidated application.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOME Homeowner Activities	2025	2029	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing	HOME: \$3,350,000.00	Homeowner Housing Added: 35 Household Housing Unit Homeowner Housing Rehabilitated: 1 Household Housing Unit
2	HOME Rental Assistance	2025	2029	Affordable Housing	Non-Entitlement Geographic Area	Rental Assistance	HOME: \$2,000,000.00	Tenant-based rental assistance / Rapid Rehousing: 450 Households Assisted
3	HOME Multifamily Activities	2025	2029	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing PSH	HOME: \$5,891,638.00	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Emergency Shelter	2025	2029	Homeless	Non-Entitlement Geographic Area	Rental Assistance Rapid Rehousing Emergency Shelter Grant Activities Homelessness Outreach Prevention of Homelessness Other Housing or Service Needs	ESG: \$2,666,606.00	Tenant-based rental assistance / Rapid Rehousing: 177 Households Assisted Homeless Person Overnight Shelter: 2500 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 75 Beds
5	HOPWA Activities	2025	2029	Non-Homeless Special Needs	Non-Entitlement Geographic Area	Rental Assistance Other Housing or Service Needs	HOPWA: \$1,442,662.00	Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted Other: 150 Other
6	CDBG Housing	2025	2029	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing Homebuyer Rehabilitation and Development	CDBG: \$3,353,572.00	Homeowner Housing Rehabilitated: 30 Household Housing Unit
7	CDBG Economic Development	2025	2029	Non-Housing Community Development	Non-Entitlement Geographic Area	Economic Development	CDBG: \$4,516,930.00	Businesses assisted: 50 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	CDBG Public Facilities	2025	2029	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Facilities Other Housing or Service Needs	CDBG: \$8,834,662.00	Other: 35000 Other
9	CDBG Services	2025	2029	Recovery Kentucky Services	Non-Entitlement Geographic Area	Public Services	CDBG: \$2,600,000.00	Other: 1100 Other
10	CDBG Public Improvement/Infrastructure	2025	2029	Non-Housing Community Development	Non-Entitlement Geographic Area	Public Improvements/Infrastructure	CDBG: \$5,803,703.00	Other: 30000 Other
11	Housing Trust Fund Multifamily Activities	2025	2029	Affordable Housing	Non-Entitlement Geographic Area	Production of New Affordable Housing Rehabilitation of Affordable Housing	HTF: \$3,134,373.00	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 0 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	TBRA
3	Goal Name	HOME Multifamily Activities
	Goal Description	Rehabilitation of rental housing with or without acquisition; new construction.
4	Goal Name	Emergency Shelter
	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. TBRA 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 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	Enhance economic stability and prosperity by increasing economic opportunities for residents through job creation and other strategies to assist businesses.

8	Goal Name	CDBG Public Facilities
	Goal Description	Eligible CDBG public facilities (i.e., Senior Centers).
9	Goal Name	CDBG Services
	Goal Description	Eligible CDBG public services for Recovery Kentucky.
10	Goal Name	CDBG Public Improvement/Infrastructure
	Goal Description	Water, wastewater and drainage projects.
11	Goal Name	Housing Trust Fund Multifamily Activities
	Goal Description	New construction or rehab of affordable rental properties

Projects

AP-35 Projects – 91.220(d)

Introduction

N/A

Projects

#	Project Name

Table 3 – Project Information

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

Kentucky’s block grant funds will be distributed statewide 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 can 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.

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

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate number of fa will the activ
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AP-50 Geographic Distribution – 91.220(f)

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

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

HOME: Based upon demand for available funds, KHC will work 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 BoS CoC 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. A competitive application was conducted in Summer 2024 to allocate ESG funds on a two-year basis with proportional renewals based on the changes in ESG entitlement funding in the second year of the grant. The next ESG competitive application will be held in Spring/Summer 2026.

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 BoS to be covered by HOPWA funding. The FFY2024 allocation of HOPWA formula funding will be awarded to current HOPWA subrecipients on a renewal basis resulting from a competitive application held in Spring 2023 for FFY2022 funds as the third year of a three-year grant cycle. FFY2024 funds will be awarded on a renewal basis in Spring 2025 with allocations made proportionally to subrecipients based in changes to formula funding from FFY2023. The next HOPWA competitive application will be conducted in Spring/Summer 2026.

HTF: Based upon demand for available funds, KHC will work 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	90

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In general, investments are not allocated geographically. KHC will continue to try 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 10% 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 – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 5 - One Year Goals for Affordable Housing by Support Requirement

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

Table 6 - One Year Goals for Affordable Housing by Support Type
Discussion

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

One-year goals include:

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

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

AP-60 Public Housing – 91.220(h)

Introduction

The KHC Tenant Assistance Program (TAP) does not manage any public housing. The TAP continues to administer the HCV Program in areas of the state that are not served by a local PHA. KHC aggressively pursues any new voucher funding opportunities to add to the current capacity of the HCV program. There are 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 32,000 families statewide.

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

The TAP is focused on program utilization during 2025, with a minimum of 98% of housing assistance funds received from HUD expended for the calendar year. The TAP HCV Waiting List is currently closed due to the high volume of applicants. TAP will continue to monitor the need to open the HCV waiting list and offer new vouchers as utilization becomes available. KHC will increase outreach to potential owners to maintain an adequate supply of affordable housing for the HCV program.

KHC has been 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 NOFA opportunities.

KHC, through its HCV program available in 87 counties, created the Kentucky Moving On initiative in 2017. The program is a partnership with the KY BoS CoC, whereby persons currently in CoC-funded PSH 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. Via competitive grants awarded in 2019 and 2020, KHC also received 300 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. CoC partner agencies refer clients with a history of homelessness to KHC for these vouchers.

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

The FSS Program, administered by KHC, provides supportive services to participants who possess a HCV when they sign a five-year contract of participation. The goal of this program is to help participants become self-sufficient by obtaining employment and becoming free of government assistance, including

public housing.

FSS participants receive employment skills training, budget and credit counseling, money management tips and homeownership education. KHC also establishes a savings account with monthly deposits based on the participant's increased earnings. FSS graduates are encouraged to use the escrow funds as a down payment on a home, but this is not mandatory.

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

KHC, as the BoS PHA, is currently designated as a Standard performer.

Discussion

KHC's HCV program continues to administer 74 Family Unification Program (FUP) vouchers awarded in 2019 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 children in out-of-home care or the delay in returning children 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, assistance for youth may be extended for an additional 24 months with FSS participation.)

Case workers with the CHFS refer clients to KHC for Family Unification Program vouchers.

In July 2021, KHC's HCV program was awarded 257 new Emergency Housing Vouchers (EHV) through the American Rescue Plan (ARP) of 2021.

EHV Vouchers are a time limited program. Vouchers currently leased will maintain assistance through September 30, 2030.

EHV vouchers were created to address the continued impact of COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. The program assists the following Individuals and families:

- Experiencing homelessness.
- At risk of experiencing homelessness.
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

In June 2023, KHC's HCV program was awarded 25 Housing Stability Vouchers. The program can assist the following individuals and families:

- Individuals and families who are currently experiencing homelessness;
- Individuals and families at risk of homelessness;
- Individuals and families fleeing or attempting to flee domestic violence, dating violence, stalking, sexual assault; and

- Veterans and families that include a veteran family member that meet one of the preceding criteria.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

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, 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 10-Year Plan to End Homelessness.
 - Monitor and oversee implementation of Kentucky's 10-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

As was discussed in SP-55, 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 identified local people in each county most likely to know of rural homeless locations (i.e., police officers, mail carriers, school bus drivers, etc.). Working with the ESG recipients, KHC also encourages inclusion of street outreach as an eligible use for the state ESG allocation. Training on the eligible uses of ESG street outreach was made available across the state.

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

See the appendix in AD-26 for the entirety of AP-65.

Helping homeless persons (especially chronically homeless individuals and families, families

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

By prioritizing ESG funds for use with RRH programs and by working with the CoC to identify agencies to apply for new CoC RRH and PSH projects, resources are becoming better aligned with the need to reduce the time individuals and families remain homeless as well as giving them access to sustainable, permanent housing options. Kentucky has various services and housing that assist homeless veterans. Collaborations with the Kentucky Interagency Council on Homelessness have been successful in identifying resources and gaps in veterans' assistance.

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

Under the ESG, the state continues to allow funds to be allocated to Homelessness Prevention. The CoC collaborates with 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.

Discharge planning efforts from health-care facilities in Kentucky takes place according to the healthcare venue or program. Kentucky participates in Medicaid and Medicare programs and is required to adhere to all applicable standards of care, including discharge. CMS, which hospitals must have in effect, offer 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.

Discussion

AP-70 HOPWA Goals - 91.220 (I)(3)

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

KHC completed the development of an updated AI in 2024-2025. Please see AD-25, Administration, Unique Appendices for a copy of the full document.

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

- KHC shifted to a more digital approach to celebrate its work and to influence change. The corporation launched “Bringing It Home with KHC” in 2023, a podcast with an accompanying blog. There, KHC staff members interview partners, influencers, customers and program recipients to tell the story of affordable housing in Kentucky. It is a more powerful, interactive way to show the situation and where the state wants to go. The blog also serves as a warehouse for all the stories of KHC’s groundbreaking, ribbon-cuttings, home dedications, events and Success Stories. The website housing both the podcast and blog is searchable and shareable worldwide, making it more accessible to a broader audience.
- 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 and landlord recruitment.

Discussion:

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

KHC will continue to grow and expand its marketing efforts to communicate the need and benefits of affordable housing. It already has a robust social media presence, a widely attended Kentucky Affordable Housing Conference and a burgeoning blog and podcast. KHC aims to build on those efforts to make them even more effective in telling the story of not only the impact KHC’s programs and partners have, but also the effect affordable housing could have if fully funded and supported.

AP-85 Other Actions – 91.220(k)

Introduction:

The following are actions to address multiple community development issues.

Actions planned to address obstacles to meeting underserved needs

Existing rental housing is 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 experiencing homelessness will continue to be assisted under CoC grants initially awarded to an eight-county region in southeastern Kentucky under Round 1 of the Youth Homelessness Demonstration Project that are now in renewal status.

In February 2022, KHC launched the Housing Connector Team to provide services for specialized voucher holders experiencing homelessness who have been referred to the Emergency Housing Voucher, Mainstream Voucher, and, as of December 2023, Supportive Housing Voucher programs. Services include: client driven unit identification, landlord outreach and negotiation, HCV application assistance, housing search and placement services, and connection to mainstream benefits. The Housing Connector Team has tremendously increased lease up rates for these specialized vouchers and KHC was awarded a Rural "Special NOFO" award to continue Housing Connector Services in 99 rural Kentucky counties.

Actions planned to foster and maintain affordable housing

The 2025-2029 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 require 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 statewide on a competitive basis for eligible activities through several methods described in the program guidelines for each program. The purpose of this is to preserve existing affordable housing and foster new affordable housing opportunities. Units of local government, nonprofit and for-profit entities can 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 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 learn 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, HQS inspections are performed at rental properties statewide.

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 often, 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 structure to help communities.
- Enabling local communities to plan for future community development needs.

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

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

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

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

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 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, 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 are 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 HCV Program funds in counties where there is no local housing authority. Special

Purpose Vouchers such as Mainstream, Housing Stability Vouchers and Emergency Housing Voucher are administered in the BoS CoC jurisdiction.

- KHC works with HUD and the Federal Financing Bank in the administration of the Risk-Sharing Program to increase the number of safe, decent, and affordable rental units statewide. 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, HOME, and HTF programs as well as other federal and state housing programs for the development of affordable rental housing statewide. KHC continues to maintain relationships with several private developers who utilize HOME funds to provide homeownership opportunities for low-income Kentuckians.

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

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 Strategic Plan to End Homelessness. The policy subcommittees are supportive housing, services and prevention, public will, and data.

Serve Kentucky (formerly the 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. Serve Kentucky actively engages citizens in community service opportunities that enable volunteers, organizations, and businesses to share ideas and effectively collaborate to address Kentucky's needs. Serve Kentucky 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. The Kentucky Department for Behavioral Health, Developmental and Intellectual Disabilities 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 PSH as funds become available.

The network of 100-bed Recovery Kentucky Centers are 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 and addict regain a life of sobriety and to begin a journey toward permanent housing and self-sufficiency.

The FSS Provider Coordinating Committee 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 HCV Voucher program has 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 – 91.220(I)(1,2,4)

Introduction:

See below.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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
<TYPE=[text] REPORT_GUID=[A698417B4C924AE0218B42865313DACF] DELETE_TABLE_IF_EMPTY=[YES]>	
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.	91.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

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

- A description of the form of investment;
- Justification for the need for the form of investment; and
- A description of the proposed means of securing the investment, if any. KHC will not permit other forms of investment without prior HUD approval.
- Additionally, the only preferences applied to HOME funding are as follows:
 - o For homebuyer activities: Households earning at/below 80% AMI and with non-home assets below \$50,000.
 - o For rental activities: Households earning at/below 60% AMI and, when HOME is allocated along with Tax-Exempt Bond or LIHTC financing, projects that will create new rent-restricted multifamily units or 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).
 - o In NOFAs for individual formula allocation programs, KHC delineates in detail the eligible applicants and beneficiaries of each program. KHC also identifies funding priorities in individual program NOFAs as well as in the LIHTC Qualified Allocation Plan.

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

For homeownership activities, KHC requires all HOME funds to be repaid at the time the property is transferred to another owner.

If the property is sold, leased, refinanced, or no longer used as the primary residence of the assisted homeowner; KHC may recapture the AHTF or HOME funds. In the event the net proceeds from a sale are insufficient to repay KHC the HOME or AHTF investment, KHC will recapture the net proceeds. In the event of foreclosure, if the shared net proceeds are insufficient to repay the HOME funds, the HOME affordability may be terminated, subject to 24CFR Part 92.254(a)(5)(ii)(A).

Additional guidance on the resale and recapture provisions is available in the HOME Homebuyer Development Program Recapture/Resale Provisions guidance document appended to the corporation's Consolidated 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 Homebuyer/Home Repair Programs Application Guidelines and the KHC Single-Family Homebuyer Development Policy Manual.

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.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)). <TYPE=[text] REPORT_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

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

See 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 (KY BoS CoC) has fully implemented its Coordinated Entry System (CES) in accordance with the HUD requirements. The KY BoS 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 regional bodies called Local Prioritization Communities (LPCs), which mirror existing Area Development Districts (ADDs). All areas are utilizing a common assessment tool and are following policies and procedures adopted by the Ky BoS CoC Advisory Board. The KY BoS 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. KHC serves as the CCES oversight entity. In November 2020, additional improvements were made to the CES based on lessons learned from multiple years of implementation, including feedback from participating organizations and participants. KHC now serves as the entity responsible for the provision of referrals to available permanent housing resources in each Local Prioritization Community via the KY Homeless Management Information System (KYHMIS). KHC has a dedicated staff member assigned to overseeing coordinated entry implementation. Four KY BoS CoC member agencies continue to receive CoC Supportive Services Only (SSO) grants to support their work as Coordinated Entry leads in their regions, and in the HUD 2021 CoC Competition, the KY BoS CoC was awarded a coordinated entry grant to support BoS-wide housing navigation services and two new regional Coordinated Entry lead grants. The KY BoS CoC Advisory Board has established a coordinated entry committee, which is charged with overseeing the implementation of coordinated entry in conjunction with KHC. 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 2024, KHC held a competitive application to award FFY2024 ESG dollars. Funds were awarded on

a 2-year basis which will also governs the allocation of FFY2025 ESG funds.

FFY2024 applications were be ranked based on score and allocations will be made based on applicant ranking, overall request, and expenditure rates from the FFY 2020, FFY2021, FFY2022. And FFY2023 ESG awards.

2024 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 and adhere to Equal Access Rules.

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. KHC is also engaging persons with lived experience of homelessness via a subcommittee of the CoC Advisory Board

5. Describe performance standards for evaluating ESG.

KHC has implemented ESG Performance Standards for all subrecipient agencies. The primary outcomes KHC will monitor will be those established by HUD as part of the CoC System Performance Measures that are relevant to ESG programs, which includes:

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

KHC will also focus on outcomes established in All In: The Federal Strategic Plan to Prevent and End Homelessness, which calls for coordinated efforts to end homelessness for veterans, youth, families, and chronically homeless in addition to persons experiencing homelessness overall.

CDBG Specific: 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: 2022, 2023, and 2024.

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

HTF Additional Information: There is no maximum award amount associated with the HTF program.

Additionally, information regarding the following can be found on the specified pages of the 2023-2024 Multifamily Guidelines attached to this Action Plan:

- Lead-Based Paint: pages 47, 53-54, 70
- Accessibility: page 112
- Disaster Mitigation: state building codes address earthquake resistant construction in higher risk zones; pages 31 and 47 of Multifamily Guidelines address flood plain
- State and local Codes, Ordinances, and Zoning Requirements: Minimum Design requires compliance with State and Local codes. Page 111 of Multifamily Guidelines addresses building codes; zoning is addressed on pages 27, 48, and 51
- Inspectable Areas and Observable Deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing: page 100
- Capital Needs Assessment: pages 32, 48, 93, 109, and 112-114 of Multifamily Guidelines address PCNA assessments and reserve accounts