

Bill No. 5171

Ordinance No. \_\_\_\_\_

Requested by: Michael Hurlbert

Sponsored by: Nancy Schneider

AN ORDINANCE RELATING TO HOUSING AND COMMUNITY ASSISTANCE AND (1) APPROVING THE 2023 ANNUAL ACTION PLAN FOR ST. CHARLES COUNTY, MISSOURI, IN ITS CAPACITY AS AN URBAN COUNTY FOR FY 2021-2025 UNDER THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM OF THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), AND AUTHORIZING THE COUNTY EXECUTIVE TO EXECUTE ALL DOCUMENTS OR CERTIFICATIONS REQUIRED FOR SUBMITTAL TO HUD WITH THE ACTION PLAN AND (2) FURTHER AUTHORIZING THE COUNTY EXECUTIVE TO EXECUTE THE FUNDING APPROVAL/AGREEMENTS THAT HUD SHALL REQUIRE UPON APPROVING THE 2023 ANNUAL ACTION PLAN

WHEREAS, St. Charles County Ordinance 22-045 authorized intergovernmental agreements with the cities of Cottleville, Lake Saint Louis, New Melle, St. Peters, St. Paul, Weldon Spring, and Wentzville to support an application by St. Charles County to the United States Department of Housing and Urban Development for qualification as an “Urban County” under the Department’s Community Development Block Grant Programs, pursuant to “The Housing and Community Development Act of 1974,” and that application was approved for FY 2023-2025;

WHEREAS, St. Charles County Ordinance 17-055 authorized intergovernmental agreements with City of St Charles for City of St Charles' joining Urban County for FY 2018-2019 and administering Urban County CDBG Program; and

WHEREAS, the City of St. Charles has developed a 2023 Annual Action Plan consistent with the St. Louis County HOME Consortium's Five Year, 2021-2025 Consolidated Plan; and

WHEREAS, the St. Louis HOME Consortium is composed of contiguous units of local government including St. Louis County, the City of Florissant, the City of O'Fallon, the City of St. Charles, Jefferson County and St. Charles County that have joined together for FY 2021-2025 for the purpose of receiving a HOME allocation and administering a HOME Program as a single grantee; and

WHEREAS, the Department of Community Development recommends that the governing body of St. Charles County approve the 2023 Action Plan for this jurisdiction's submittal to HUD pursuant to 24 Code of Federal Regulations Part 91; and

WHEREAS, the Department of Community Development further recommends approval of the 2023 Action Plan by ordinance of the governing body of St. Charles County because, like this County's Transportation Improvement Plan or this County's Master Plan which are also adopted or authorized by ordinances, the Action Plan – if approved by the United States

Department of Housing and Urban Development – will guide future decisions by St. Charles County, particularly decisions to apply Community Development Block Grant funds to housing and community development activities in the County and participating cities, as provided in 24 Code of Federal Regulations Part 91; and

WHEREAS, upon approving the County’s Action Plan for 2023 and funding for programs identified therein, HUD shall require execution of Funding Approval/Agreements for those amounts; and

WHEREAS, Section 70.220 of the Revised Statutes of Missouri authorizes execution of intergovernmental agreements between political subdivisions of this state and duly authorized agencies of the United States for the purposes herein set out.

NOW, THEREFORE, BE IT ORDAINED BY THE COUNTY COUNCIL OF ST. CHARLES COUNTY, MISSOURI, AS FOLLOWS:

Section 1. The St. Charles County 2023 Annual Action Plan attached hereto as Exhibit A is hereby approved for submission to the United States Department of Housing and Urban Development or “HUD” in connection with the County’s activities as an Urban County under HUD’s Community Development Block Grant Programs.

Section 2. The County Executive or his designee is hereby authorized to execute all documents or certifications, including the “SF 424” and the “CPMP Non-State Grantee Certifications” attached hereto as **Exhibits B**

**and C**, which are required for submittal with **Exhibit A** to the United States Department of Housing and Urban Development or HUD.

Section 3. The County Executive is further authorized to execute the Funding Approval/Agreements that HUD shall require upon approving the 2023 Annual Action Plan.

Section 4. This ordinance shall be in full force and effect from and after the date of its passage and approval.

\_\_\_\_\_  
DATE PASSED

\_\_\_\_\_  
DATE APPROVED BY COUNTY EXECUTIVE

\_\_\_\_\_  
CHAIR OF THE COUNCIL

\_\_\_\_\_  
COUNTY EXECUTIVE

ATTEST:

\_\_\_\_\_  
COUNTY REGISTRAR

# EXHIBIT A

## Executive Summary

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

#### 1. Introduction

The Community Development Block Grant (CDBG) is funded by the U.S. Department of Housing and Urban Development, (HUD). St Charles County is a Grantee of the CDBG. HUD CDBG regulations require grantees to submit to HUD for approval a 3- or 5-year Consolidated Plan, and an Annual Action Plan, (AAP) for each year. St Charles Urban County elected a 5-year Consolidate Plan cycle which runs from 2021-2025. This document represents year three (3) of the Consolidated Plan cycle and is the Annual Action Plan for January 1, 2023 – December 31, 2023.

#### 2. Summarize the objectives and outcomes identified in the Plan

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

The County's CDBG funds will be allocated toward projects with the objective of providing decent housing and a suitable living environment. The outcome will be to make these programs available and accessible for low-income eligible residents. Programs were developed based on needs identified through the public hearing process, comments received, and jurisdiction experiences regarding needs. Below is a list of identified projects and the outcome and objectives associated with each program for FY2023.

- Urban County Home Improvement Program - Availability/Accessibility for decent housing
- Urban County Affordable Rental Program - Availability/Accessibility for decent housing
- Urban County Transportation Program - Availability/Accessibility for the purpose of creating economic opportunities
- St Peters Transportation Program - Availability/Accessibility for the purpose of creating economic opportunities
- St Peters Meals on Wheels - Affordability for the purpose of creating economic opportunities
- Public Services Coordinated Entry Program - Accessibility for the purpose of creating economic opportunities
- Urban County Public Services Program - Availability/Accessibility for the purpose of creating economic opportunities
- St Peters Home Improvement Program - Availability/Accessibility for decent housing

- St Peters Community Services Program - Availability/Accessibility of suitable living environments
- St Charles Code Enforcement - Availability/Accessibility of suitable living environments
- St Charles Continuum of Care - Suitability for the purpose of creating economic opportunity
- Urban County Homeless Prevention Program - Availability/Accessibility for decent housing

### **3. Evaluation of past performance**

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

This plan covers the third year of the five-year CDBG Consolidated Plan period for the St. Louis County HOME Consortium. During FY22 the County continued programs developed during prior years based on unmet needs. St Charles County is not reprogramming any unspent funds during this planning process. St Charles County will continue to focus on better communication with the public on the availability of the programs to include advertising the programs in the participated jurisdictions monthly newsletters to their residents and doing presentations with all of the different municipalities Community Development Departments.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The process for the development of this plan includes posting the notice about the public hearing and plan availability on the County's website, sending the notice to the participating jurisdictions for posting and notification to their residents, and utilizing the Community Council of St Charles to hold a public hearing and solicit any comments and/or suggestions at a monthly Continuum of Care (COC) meeting. A list of existing or unmet needs will be discussed with the attendees to see how existing programs are necessary to continue in meeting the needs and addressing homelessness, coordination intake, mobile home repairs, and transportation. The draft plan will be made available for a 30-day comment period.

### **5. Summary of public comments**

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

Staff spent time describing existing programs and answering questions about the Urban County's CDBG programs with the members of the Continuum of Care. Many agencies were represented and shared comments on needs they are experiencing. The identified needs include: affordable and accessible housing.

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

The County took all comments into consideration. The County uses the St Charles County Community Assistance Board to select a subrecipient to expend homelessness funds each year. This was relayed during the public hearing.

## **7. Summary**

The County will fund 15 existing projects during FY2023.

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

Agency Role	Name	Department/Agency
Lead Agency	ST. CHARLES COUNTY	
CDBG Administrator	ST. CHARLES COUNTY	Department of Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative**

St Charles County contracts with the City of St Charles for program administration of the CDBG funds. Robert Myers, Planning & Zoning Division Director, St Charles County is the primary contract and Kathleen Thompson, CDBG Administrator, City of St Charles is the secondary contact.

**Consolidated Plan Public Contact Information**

Interested parties can send their comments to Ms. Kathleen Thompson, CDBG Administrator St Charles Urban County 200 N 2nd Street, Ste 303, St Charles, MO 63301 or by email to [Kathleen.thompson@stcharlescitemo.gov](mailto:Kathleen.thompson@stcharlescitemo.gov).



## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The County does not receive ESG funds. Staff participates in the Continuum of Care meetings, receiving updates on the Homeless Management Information System (HMIS). This process is handled through the Community Council which applied for funding directly to assist with the administration of the system. The HMIS system allows the Community Council to generate data to assist the County with completing CDBG plans.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The County coordinates with public and assisted housing providers through its representation at the Continuum of Care meetings. Staff promotes CDBG & HOME programs and gives updates on what programs may be available throughout the year to eligible residents of the participating jurisdictions. The Continuum meetings provide an excellent opportunity for networking and sharing of information regarding programs. These agencies can then take the program information back to their clients to share the opportunities that are available.

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

Staff participates in the Continuum of Care meetings to get updates on the Continuum's efforts to address the needs of homeless persons. Many of the agencies participating in the meetings are working with these homeless populations. Assistance to the residents at risk of homelessness was an identified need during the 5-year Con Plan period and continues to be acknowledged by the County as a need. St Charles County has previously funded Sts. Joachim and Ann Care Services and Community Council of St Charles County, who are participants in the Continuum of Care, with CDBG money to fund homeless programs such as providing rent and or utility assistance for those in jeopardy of becoming homeless. This use falls under the 15% public service cap so funds are limited as transportation, another identified priority need, is also funded with a portion of this cap.

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

The County does not receive ESG funds. Staff participates in the Continuum of Care meetings, receiving updates on the Homeless Management Information System (HMIS). This process is handles through the Community Council which applied for funding directly to assist with the administration of the system. The HMIS system allows the Community Council to generate data to assist the County with completing CDBG plans.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	COMMUNITY COUNCIL ST CHARLES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders

<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  Market Analysis  Anti-poverty Strategy  Lead-based Paint Strategy</p>
<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Agencies were notified via the Community Council to attend a public hearing to help identify needs within the community. St Charles Urban County hosted a joint public hearing in an effort to attract area agencies and public participation in the process. There were approximately 40 individuals that attended the virtual public hearing. The agencies were given an opportunity to discuss all topics of need to be considered. Discussion included the need for affordable rental housing, housing rehabilitation, transportation, home-ownership, rent and utility assistance. The County, either through its website, through the Continuum of Care contact list, mailings, or direct email and phone calls made an effort to contact all area agencies to encourage participation.</p>

2	<b>Agency/Group/Organization</b>	St. Charles Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Other government - Federal Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The CDBG Administrator continuously meets with the PHA Director to discuss working together on the issues above. CDBG and PHA will work together to improve participation in programs for the residents of the PHA, and to encourage the PHA participation in the Family Self Sufficiency Program to inform them about Homeownership Assistance Program as well as other programs for job mentoring and training.

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

Through assistance from the St Charles Community Council and Continuum of Care, the County provided outreach to St. Charles County organizations. There were no agencies purposefully left out of the public hearing process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	St Charles Community Council	The Continuum of Care provides a networking opportunity for area agencies to gather to discuss the state of the community in regards to their clients, programs, and assistance. The Continuum of Care also leads the charge to end homelessness. The County coordinates with the Continuum agencies in an effort to provide assistance in reaching their goals to assist those in need within the community.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

The County and the Continuum of Care coordinate efforts to host public hearings within the County for its planning processes. The communities acknowledge that while some of their needs may vary, there are also some that overlap. Staff representing St Charles County also shared information on programs and their guidelines to assist in helping eligible residents.

**AP-12 Participation - 91.401, 91.105, 91.200(c)**

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

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities  Non-English Speaking - Specify other language: Various  Persons with disabilities	On January 13, 2023, met with members of the St Charles County Housing Team	Comments and ideas on the lack of affordable housing in the County. Team members will be holding a Housing Resource Fair in May for empower the general community with resources they need to find housing.	There were no unaccepted comments	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	On January 5, 2023, attended the University of Missouri Extension Council monthly board meeting.	Comments on the programs that are offered through the Extension Council and their broadband initiative.	There were no unaccepted comments	
3	Public Meeting	Non-targeted/broad community	On February 8, 2023, attended the University of Missouri Extension Council monthly board meeting, topic of conversation was the university's broadband initiative. Presented the estimated budget and activities to members to solicit comments for proposed activities	There were no comments received	There were no unaccepted comments	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Meeting	Minorities  Non-English Speaking - Specify other language: Various  Persons with disabilities	On February 16, 2023, attended the Human Relations Commission monthly meeting. Presented the estimated budget and activities to members in order to solicit comments for proposed activities	There were no comments received	There were no unaccepted comments	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

#### 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	1,064,950	30,000	0	1,094,950	0	The County will continue to allocate 15% to admin, 15% to public service, and the remaining dollars to fund various programs for eligible low-income families through the participating jurisdictions of St Charles Urban County. The County anticipates to receive \$30,000 of program income and will use 90% of the funds on low-moderate income participants.

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: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Housing	0	0	0	0	0	St Charles Continuum of Care anticipates receiving funding for the Homeless Management System
Housing Trust Fund	public - state	Housing Public Services	0	0	0	0	0	Funds emergency assistance and rental assistance to prevent homelessness for approximately 225 households, and assists with housing agency operating funds.
LIHTC	public - state	Housing	0	0	0	0	0	Low Income Housing Tax Credits received are both federal and state tax credits for housing development
Section 8	public - federal	Housing	0	0	0	0	0	Section 8 vouchers for low-income housing for eligible County residents. Vouchers will be allocated to St Charles County for rental housing subsidies.
Tax Credits	public - state	Housing	0	0	0	0	0	Will fund affordable rental housing and affordable home ownership

Table 5 - Expected Resources – Priority Table

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

The Community Development Block Grant will fund some similar receiving private, state, and local funds, such as rent and utility assistance but will also expand services to low-income families by funding additional programs not already funded by other resources. All of the funds received by the County are important to reach and assist as many in the community as possible. The CDBG programs help expand available services for low-income families and fill a gap in services. There have been no matching requirements identified at this time.

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

At this time, there is no publicly owned land or property to address the needs identified within the plan.

**Discussion**

While it appears that St Charles County has several financial resources available to assist low-income St Charles residents, these dollars do not fulfill all of the needs or fill in all of the service gaps experienced within the County. Community Development Block Grant funds are an important resource for the County and have assisted many families with needed programs and services over the last three years and will continue to be an important resource over the next 5 years.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development/Rehabilitation	2021	2025	Affordable Housing	St. Charles Urban County	Affordable Housing Development / Rehabilitation	CDBG: \$60,000	Rental units rehabilitated: 1 Household Housing Unit
2	Housing Rehabilitation	2021	2025	Affordable Housing	City of St. Peters St. Charles Urban County City of St. Charles	Housing Rehabilitation	CDBG: \$614,465	Homeowner Housing Rehabilitated: 65 Household Housing Unit
3	Program Administration	2021	2025	Administration	City of St. Peters St. Charles Urban County City of St. Charles	Program Administration	CDBG: \$159,742	
4	Transportation	2021	2025	Non-Homeless Special Needs	City of St. Peters City of St. Charles	Transportation	CDBG: \$63,243	Public service activities other than Low/Moderate Income Housing Benefit: 850 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Community Services	2021	2025	Non-Homeless Special Needs	City of St. Peters St. Charles Urban County City of St. Charles	Community Services	CDBG: \$71,500	Public service activities other than Low/Moderate Income Housing Benefit: 30 Persons Assisted
6	Homeless Prevention	2021	2025	Affordable Housing	St. Charles Urban County	Homeless Prevention	CDBG: \$25,000	Homelessness Prevention: 50 Persons Assisted
7	Code Enforcement	2021	2025	Affordable Housing	City of St. Charles	Code Enforcement	CDBG: \$70,000	Housing Code Enforcement/Foreclosed Property Care: 350 Household Housing Unit

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Development/Rehabilitation
	<b>Goal Description</b>	Affordable rental housing was identified as a priority need for the community. St Charles County provides 1 rental unit through the purchase of one house and the cost to rehab the home. This project was identified as a community need for affordable rental housing

2	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	Includes the City of St Charles and St Peters The Home Improvement Programs provide decent, safe, affordable housing for low-moderate homeowner occupants. The programs funded in the St Charles Urban County's participating jurisdictions provides services to this demographic that they would not otherwise be able to afford. A total of 65 units of service are projected which also includes funding of one full time staff person and one part time staff person to administer the Home Improvement Programs for St Charles County and the City of St Peters
3	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	The City of St Charles is under contract with the St Charles Urban County to administer CDBG activities. St Peters will provide their own oversight of the Home Improvement Program, Transportation Program, and other small projects specifically for St Peters residents
4	<b>Goal Name</b>	Transportation
	<b>Goal Description</b>	St Charles Urban County has essential transportation programs for the elderly and disabled. Residents of all participating jurisdictions (PJ's), are eligible to participate. The City of St Peters coordinates their own transportation program. The City of St Charles coordinates rides for the other PJ's.
5	<b>Goal Name</b>	Community Services
	<b>Goal Description</b>	The Community Services projects are divided amongst the participating jurisdictions. The City of St Peters also has public services projects such as transportation, Meals on Wheels, Lawn Mowing services, and General Community Services. All programs and activities provide such services to low-moderate income persons to include those with disabilities and who are elderly.
6	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	The Community Services projects are divided amongst the participating jurisdictions. Some community services are funded for homeless prevention within St Charles County municipalities. The services can include but not limited to Coordinated Entry, and the Point in Time homeless count.

7	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	City of St Charles Only. Supports one full time inspector that works in CDBG eligible areas where the majority of the households are primarily low-moderate income. The Code Enforcement Officer conducts property maintenance inspections and rental inspections to ensure that a house is safe, decent, and habitable.



## AP-35 Projects - 91.420, 91.220(d)

### Introduction

St Charles Urban County will fund 15 projects during FY23. These projects will be funded based on priority needs identified during the FY-2021-2025 Consolidated Planning period and the FY23 Annual Planning process. These identified needs will be funded with CDBG monies and/or leveraged municipal funds.

#	Project Name
1	2023 UC Home Improvement
2	2023 STC Rehab Admin
3	2023 STC Code Enforcement
4	2023 STP Home Improvement
5	2023 STP Rehab Admin
6	2023 UC Affordable Rental
7	2023 STC Administration
8	2023 UC Admin
9	2023 UC Homeless Prevention (CAB)
10	2023 STP Meals on Wheels
11	2023 STP Community Services Lawn Mowing
12	2023 STP Transportation
13	2023 UC Transportation
14	2023 UC Coordinated Entry
15	2023 UC Community Services

**Table 7 – Project Information**

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

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	2023 UC Home Improvement
	<b>Target Area</b>	St. Charles Urban County
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$314,960
	<b>Description</b>	The Home Improvement Programs funded in the St. Charles Urban County's participating jurisdictions provides services this demographic would not otherwise be able to afford with home repairs.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The County anticipates assisting 65 low-income families within the Urban County
	<b>Location Description</b>	Available in the Cities of St Charles, Lake St Louis, Cottleville, Wentzville, Weldon Spring, Augusta, St Paul, Dardenne Prairie, and the unincorporated areas of St Charles County.
	<b>Planned Activities</b>	Provide financial assistance for home improvement projects including but not limited to siding, electrical repairs, plumbing, concrete improvements, and roof repair or replacement.
<b>2</b>	<b>Project Name</b>	2023 STC Rehab Admin
	<b>Target Area</b>	City of St. Charles
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$97,000
	<b>Description</b>	Funds are provided for staff salaries, benefits and other necessary insular items needed to manage the Home Improvement Programs on behalf of the County and its participating jurisdictions within the CDBG Urban County.
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Rehab admin review and support for 65 applicants in the Home Improvement Loan Program
	<b>Location Description</b>	Participants will reside within the participating jurisdictions of the Urban County. The administration office is located within the St Charles City Hall building
	<b>Planned Activities</b>	Staff to review and approve applications for the Home Improvement Loan Program. Work with clients in obtaining proposals, schedule inspections, process payments etc.
<b>3</b>	<b>Project Name</b>	2023 STC Code Enforcement
	<b>Target Area</b>	City of St. Charles
	<b>Goals Supported</b>	Code Enforcement
	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$70,000
	<b>Description</b>	Supports one full time inspector that works in CDBG eligible areas where the majority of the households reside in US Census tracts and block groups that IDIS determined have primarily low-moderate incomes. The Code Enforcement Officer conducts property maintenance inspections, and rental inspections to ensure that the house is safe, decent, and habitable.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Code Enforcement is estimated to provide 300 rental occupancy inspections, and 50 units of property maintenance code compliance. The program inspector also works with the Home Improvement clients to ensure that home rehab work is properly quoted and completed.
	<b>Location Description</b>	Within US Census tracts where the populations are at least 51% low-moderate income.
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	2023 STP Home Improvement
	<b>Target Area</b>	City of St. Peters
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation

	<b>Funding</b>	CDBG: \$202,505
	<b>Description</b>	Funds from Urban County's Entitlement provided to the City of St. Peters to make 5-year forgivable loans to low - moderate income owner occupied residential housing.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The County is anticipating assisting 27 low-income families living within the City of St Peters with home rehabilitation projects.
	<b>Location Description</b>	Low-income residents within the City of St Peters
	<b>Planned Activities</b>	Provide financial assistance for home improvement projects including, but not limited to siding, electrical repairs, plumbing, concrete improvements, and roof repair or replacement.
<b>5</b>	<b>Project Name</b>	2023 STP Rehab Admin
	<b>Target Area</b>	City of St. Peters
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$1,000
	<b>Description</b>	Funding provided to cover staff costs for management of the City of St. Peters Home Improvement Loan Program.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The County anticipates assisting 22 low-income families living within the City of St Peters
	<b>Location Description</b>	City of St Peters
	<b>Planned Activities</b>	Review applications, setup file, schedule inspection, close loans, process payments, prepare deeds and full deeds of release, and subordination deeds of trusts, and other clerical duties to support the program.
<b>6</b>	<b>Project Name</b>	2023 UC Affordable Rental
	<b>Target Area</b>	St. Charles Urban County
	<b>Goals Supported</b>	Affordable Housing Development/Rehabilitation

	<b>Needs Addressed</b>	Affordable Housing Development / Rehabilitation
	<b>Funding</b>	CDBG: \$60,000
	<b>Description</b>	Funds to purchase a home and rehabilitate and to provide one affordable rental housing unit.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Activity provides for 1 rental housing unit
	<b>Location Description</b>	Location is to be determined with in St Charles Urban County
	<b>Planned Activities</b>	Provide funding for one affordable rental unit
<b>7</b>	<b>Project Name</b>	2023 STC Administration
	<b>Target Area</b>	City of St. Charles
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$139,000
	<b>Description</b>	Funding for staff salaries, benefits, training, and office supplies necessary for administering the CDBG programs and activities.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Provides support for all programs and clients assisted
	<b>Location Description</b>	CDBG Administration Office is located within the St Charles City Hall
	<b>Planned Activities</b>	Provides CDBG Regulatory compliance as well as general administration for the Urban County including preparation of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance & Evaluation Report, Environmental Review and required reports and communications with the U.S. Department of Housing and Urban Development.
<b>8</b>	<b>Project Name</b>	2023 UC Admin
	<b>Target Area</b>	St. Charles Urban County

	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$20,742
	<b>Description</b>	Program delivery costs for all programs associated with Urban County CDBG
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Provide program administration for general planning activities
<b>9</b>	<b>Project Name</b>	2023 UC Homeless Prevention (CAB)
	<b>Target Area</b>	St. Charles Urban County
	<b>Goals Supported</b>	Community Services Homeless Prevention
	<b>Needs Addressed</b>	Community Services Homeless Prevention
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	Provides temporary assistance for rent & utility payments to prevent homelessness.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	St Charles County estimates assisting 50 residents who are low-moderate income
	<b>Location Description</b>	All residents that are assisted will live within one of the participating jurisdictions of the Urban County
	<b>Planned Activities</b>	Temporary rent and utility assistance through sub-recipients
<b>10</b>	<b>Project Name</b>	2023 STP Meals on Wheels
	<b>Target Area</b>	City of St. Peters

	<b>Goals Supported</b>	Community Services
	<b>Needs Addressed</b>	Community Services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Public service that provides hot meals to homebound seniors and the disabled
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 10 residents will be assisted.
	<b>Location Description</b>	Within the city limits of St Peters
	<b>Planned Activities</b>	the provision of hot meals delivered, 2 per day, to low-moderate income households that are homebound, elderly, and/or disabled.
<b>11</b>	<b>Project Name</b>	2023 STP Community Services Lawn Mowing
	<b>Target Area</b>	City of St. Peters
	<b>Goals Supported</b>	Community Services
	<b>Needs Addressed</b>	Community Services
	<b>Funding</b>	CDBG: \$6,500
	<b>Description</b>	Provides funds for lawn maintenance for elderly and disabled households
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 12 families will be assisted
	<b>Location Description</b>	Provides funds for lawn maintenance for elderly and disabled households
	<b>Planned Activities</b>	Property maintenance activity-prevent tall grass and weeds.
<b>12</b>	<b>Project Name</b>	2023 STP Transportation
	<b>Target Area</b>	City of St. Peters
	<b>Goals Supported</b>	Transportation



	<b>Needs Addressed</b>	Transportation
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	Essential transportation services for elderly, disabled, and low-income persons.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City of St Peters estimates that funding will assist residents with 250 rides or units of service
	<b>Location Description</b>	City limits of St Peters
	<b>Planned Activities</b>	Essential transportation to health care providers, grocery shopping, and other eligible places as necessary.
<b>13</b>	<b>Project Name</b>	2023 UC Transportation
	<b>Target Area</b>	City of St. Peters St. Charles Urban County City of St. Charles
	<b>Goals Supported</b>	Transportation
	<b>Needs Addressed</b>	Transportation
	<b>Funding</b>	CDBG: \$33,242
	<b>Description</b>	Essential transportation for low to moderate income households. Including the elderly and disabled
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The County estimates that funding will assist residents with 600 rides or units of service
	<b>Location Description</b>	
	<b>Planned Activities</b>	Countywide within participating jurisdictions
<b>14</b>	<b>Project Name</b>	2023 UC Coordinated Entry
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeless Prevention

	<b>Needs Addressed</b>	Homeless Prevention
	<b>Funding</b>	CDBG: \$45,000
	<b>Description</b>	Case management for HMIS and coordination of the HUD Annual PIT Homeless Count
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated at 20 units of service (Coordinated Entry services) to assist the homeless with resources and support the Continuum of Care
	<b>Location Description</b>	Countywide with participating jurisdictions
	<b>Planned Activities</b>	Connect homeless people to housing resources to end homelessness
<b>15</b>	<b>Project Name</b>	2023 UC Community Services
	<b>Target Area</b>	St. Charles Urban County
	<b>Goals Supported</b>	Community Services
	<b>Needs Addressed</b>	Community Services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Provide funding for eligible organizations to provide a variety of community services to low-income Urban County residents
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Will be estimated based on the applications that will be reviews by the selection board
	<b>Location Description</b>	Within St Charles County
	<b>Planned Activities</b>	Variety of eligible activities including but not limited to mental health, landlord counseling, food assistance, etc.

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

St Charles Urban County consists of the unincorporated areas of St Charles County in addition to 8 participating jurisdictions including the cities of St Charles, St Peters, Cottleville, Lake St Louis, Weldon Spring, Wentzville, St Paul, Dardenne Prairie and now Augusta. The cities of St Charles and St Peters are the only subrecipients of the Urban County for FY2023. All programs, except for the City of St Peters programs and the City of St Charles Code Enforcement, will be available for eligible residents within the participating jurisdictions of St Charles County.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City of St. Peters	23
St. Charles Urban County	33
City of St. Charles	44

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of St Charles and St Charles Urban County combined their Transportation and Home Improvement programs together. These programs continued to include existing CDBG funded programs for eligible City of St Charles and St Charles Urban County residents per its agreement with the County. City of St Peters will continue to provide 20% of the FY2023 allocation separately to St Peters residents for the home improvement loan, transportation, and community services. The City of St Charles will continue providing Code Enforcement services to the City of St Charles residents.

### **Discussion**

The City of St Charles and St Charles Urban County continue to administer programs on a county-wide basis related to housing, transportation, and community service assistance which were all identified as priority needs. The City of St Peters will continue to run their own home improvement program and public service programs. Some activities will receive new funding during FY23 while others will continue utilizing prior year remaining funds. The County will continue to promote all of the programs offered.

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

The availability of affordable rental units has been identified as a priority need within the Urban County. While this need is not a result of a community barrier, the County will make funding available during FY23 to assist with efforts to expand the affordable rental units within the Urban County jurisdictions. The County plans to identify and fund an agency or individual to purchase and rehab a property if necessary and rent as an affordable unit per the terms of the County agreement.

### **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**

The Analysis of Impediments identified several municipalities within the Urban County that have policies related to group homes to be an impediment. The County initiated communications with key community stake holders regarding individual policies. Several communities have revised policies based on the County initiated contact. The recent analysis of impediments to fair housing report highlighted that research is needed to evaluate municipal zoning codes to identify potential fair housing issues. There is still opportunity throughout the Urban County for the development of affordable housing on smaller lots via residential zoning and subdivision districts, cluster development, planned unit developments, and the rehabilitation of existing homes.

### **Discussion**

St Charles County will continue to preserve affordable housing and increase the affordable housing stock by implementing or funding activities that assist with home improvements, accessibility barriers, and down payment assistance by utilizing CDBG and HOME funds. The County will also support developers in bringing more affordable housing projects to St Charles County.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

The County makes allocations based on needs, but this does present an obstacle out of the County's control in trying to address all needs. During FY2023, the County will continue to fund existing programs to meet underserved needs. The County will also continue programs funded in previous years utilizing the prior year funding. The County will continue to assess the needs on an annual basis to determine the best way to address obstacles and the underserved needs.

### **Actions planned to address obstacles to meeting underserved needs**

During the 5-year Consolidated Plan and year three (3) planning process, several needs were identified through the public hearing and public comment period. The County has several existing programs to assist in meeting some of the underserved needs. As in the past, many if the identified needs are considered Public Services according to HUD guidelines and therefore must fall within the 15% public service cap. The County makes allocation based on needs but, this does present an obstacle that is out of the County's control in trying to address all needs. The County will continue to assess the needs on an annual basis to determine the best way to address obstacles and the underserved needs.

### **Actions planned to foster and maintain affordable housing**

During FY2023, the County has identified several housing programs to assist with the maintenance and or creating of new affordable units. The County and the City of St Charles will administer the home improvement program to provide funding to be used toward code violations or the repair or replacement of broken components within the home.

### **Actions planned to reduce lead-based paint hazards**

The County will continue to provide the Protecting your Family from Lead Brochure to all applicants of the housing rehabilitation programs and will require lead testing for any homes built prior to 1978 where a painted surface will be impacted. This will continue to be important as the housing stock continues to age. The County does not receive HOME funds directly but is part of the St Louis County HOME Consortia. St Louis County administers the funds.

### **Actions planned to reduce the number of poverty-level families**

To reduce poverty, area families need to have a steady income. The County will continue to support the efforts of the local career center and education institutions in their training programs and job placement efforts for all within the community including poverty level families. These families may also be eligible for County-wide CDBG programs ultimately free up their own funding to go toward essential needs. The County will also continue to support funding a local agency to provide rent and utility assistance to

those who may be in jeopardy of becoming homeless. The County is working with Sts. Joachim and Ann Care Service to purchase an affordable property that they can rehabilitate and rent out to a low-mod individual at or below market rent.

### **Actions planned to develop institutional structure**

The County and the City of St Charles have an excellent institutional structure with open communication regarding CDBG projects and plans. The County has and will also continue to communicate with the participating jurisdictions regarding projects to ensure participation from residents throughout the Urban County. Communication will continue to be the key in success of the programs. The urban County also relies on the St Charles Community Council and local social service agencies to relay and respond to the needs of the community and for the dissemination of program information. The County will continue to foster these relationships to improve the success rate of the CDBG programs.

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

St Charles County Housing Choice Vouchers funded by the US Department of Housing and Urban Development, (HUD) that are administered through NECAC. The Urban County has public housing units under the jurisdiction of the St Charles Public Housing Authority located within the City limits of St Charles. St Charles County agencies also work with landlords to facilitate the rental of available units for area low-income families. With funding available for housing, the County will communicate with local agencies to encourage the use of these funds to meet the housing needs within the Urban County. The county also continues to promote available programs within the County during meetings of the Continuum of Care of St Charles County and to area social service agencies working with low-income families within the participating jurisdictions.

### **Discussion**

During FY23, the County will continue several programs developed during the Consolidated Planning period to address the needs of the Urban County. The public service cap will continue to challenge the amount of funding and programs the County can administer with CDBG money to address the identified needs. The County will continue to spend down prior year dollars through existing programs and will continue with the Urban County jurisdictions, the St Charles County Community Council and area social service.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

The County's program will provide funding for 15 projects to total \$1,064,950

#### 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	30,000
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
<b>Total Program Income:</b>	<b>30,000</b>

#### 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.	90.00%

**Application for Federal Assistance SF-424**

**EXHIBIT B**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

\* c. Organizational DUNS:

**d. Address:**

\* Street1:

Street2:

\* City:

County/Parish:

\* State:

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

**e. Organizational Unit:**

DepartmentName:

DivisionName:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:

Fax Number:

\* Email:



**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

**11. Catalog of Federal Domestic Assistance Number:**

CFDA Title:

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

   

**\* 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

\* a. Federal

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes

No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:

Fax Number:

\* Email:

\* Signature of Authorized Representative:

\* Date Signed:

# EXHIBIT C

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) \_\_\_\_\_ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.



**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

---

Signature of Authorized Official

---

Date

---

Title

## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.