
1 Homelessness

Strategy for Developing a System to Address Homelessness

The District of Columbia is committed to being a national model in its approach to homelessness by preventing homelessness whenever possible and addressing the needs of our homeless neighbors by creating an individualized approach that improves well-being while moving people out of homelessness as rapidly as possible. The District will develop strategies that will allow it to be successful in federal funding competitions and that incorporate HEARTH Act requirements. It will be critical to align all possible resources, including local, federal, and private funds to be successful in achieving the goals. The Plan outlines the following three policy objectives:

- Reduce the overall number of homeless individuals and families.
- Redesign the Continuum of Care to develop an appropriate mix of services and interim and permanent housing options.
- Design an evaluation strategy and mechanism to track the District's progress in preventing and reducing homelessness.

The Plan includes ten outcome measures that the District will track to evaluate the extent to which we have been successful in preventing homelessness as well as helping people move out of homelessness more quickly through the implementation of this strategic plan. The plan includes an initial Work Plan which will be updated annually.

Key elements of the plan are defined as follows:

PREVENTION AND DIVERSION

Related to preventing people from becoming homeless by addressing their needs before they have to leave their current housing and/or diverting them as they apply for shelter. People may be able to maintain their current housing if they can get short-term financial assistance or assistance with mediation with landlords or family members. Some may need to relocate to housing that they can afford or maintain on a long-term basis. The goal is to prevent people from entering the shelter system, which can have negative impact on mental health, can be hard to leave, and is often costly.

INTERIM HOUSING

Interim housing is used as a larger category to define housing that is time-limited. In this area, there are several subsets of housing:

- *Low-barrier shelter* is usually primarily short-term shelter for individuals. Low-barrier shelter is designed to keep people safe, is often open only 12 hours a day, and is often in a congregate setting. This type of program is provided, on a first come, first served basis, to any adult presenting as homeless. It is sometimes also referred to as emergency shelter.
- *Temporary shelter* is also short-term shelter and is open 24 hours a day. Temporary shelter often has more services located on site than in low barrier shelter. This type of shelter applies to both families and individuals. It is sometimes also referred to as emergency shelter.

- *Transitional housing* is longer-term housing, usually for less than two years, that provides intensive support services, geared toward increasing a household's self-sufficiency and helping it move towards permanency, often specializing in particular areas of client needs.

AFFORDABLE HOUSING

Affordable housing differs from interim housing in that it is not time-limited. It should also be affordable over the long-term. The Homeless No More Plan describes this as "housing, either ownership or rental, for which a household will pay no more than 30% of its gross annual income." There is a large need in the District of Columbia for generally affordable housing for all levels of income. Agencies such as the DC Department of Housing and Community Development are mandated to help produce this type of housing. For purposes of this plan, the focus, however, is on housing that meets the need of people who have such low incomes that they are vulnerable to becoming homeless. In the larger category of permanent affordable housing, therefore, the focus is on the following two subsets:

- *Permanent supportive housing* is long-term, permanent housing for people with disabilities that also comes with long-term supportive services. Permanent supportive housing can either be scattered sites, based at a single site or at multiple sites. In either case, clients have leases in their own names.
- *Permanent housing* is long-term housing where people can stay as long as they wish and which they can afford. There may or may not be short-term supportive services, depending on the need of the individual or family. For purposes of this plan, the focus is on for people with incomes who are eligible for public benefits, usually from 0 to 200% of the federal poverty level, or who are vulnerable to becoming homeless, from about 200% to 300% of the federal poverty level.

Mayor Adrian Fenty and the community are committed to achieving the following three goals in the next five years, each of which has three key initiatives.

1. *Reduce the overall number of individuals and families who are homeless, including significant efforts at prevention and rapid re-housing.*
 - a. End homelessness for those already homeless, as quickly as possible, and assure that people remain housed.
 - b. Prevent homelessness for as many people as possible who are at imminent risk, and assure that people remain housed.
 - c. Improve the odds that people can remain housed by increasing income and other resources, through employment or benefits receipt.
2. *Redesign the Continuum of Care to develop an appropriate mix of services, interim housing, and permanent housing options in order to help people move out of homelessness as rapidly as possible.*
 - a. Ensure there is sufficient low-barrier shelter to keep people safe.
 - b. Ensure that there are sufficient, appropriate interim housing options (temporary and transitional) that address specific needs.
 - c. Develop and/or subsidize units to reach the goal of at least 2,500 units of permanent supportive housing.
3. *Develop a mechanism and an evaluation strategy to track the District's progress in preventing and reducing homelessness.*
 - a. Develop benchmarks for key client outcomes based on national data and data from local providers.
 - b. Develop a system of performance-based contracts that rewards providers for successful outcomes and ensures accountability.

- c. Track and analyze outcomes annually to assess improvement, areas of needed resources, areas for better interagency coordination, etc.

Annual Work Plans will lay out concrete steps to be taken annually, given budget realities and changing circumstances, to meet these key initiatives. The outcomes identified in this document are also tied to ensuring that these goals and initiatives are achieved.

Critical Success Factors

In order for these redesigned systems to be successful in meeting client needs, three factors are critical and need to be tracked regularly.

1. *SUPPLY OF PERMANENT HOUSING AND PERMANENT SUPPORTIVE HOUSING*

In both systems of care, it is critical that families and individuals have permanent housing to move into. Success will rely both on creating rental subsidies as well as producing units that are affordable. The Permanent Supportive Housing Program Unit Generation Report, the implementation roadmap for the permanent supportive housing section of the District's Homeless No More Plan, recommended a mix of approximately 65% scattered site/leased units and 35% newly constructed and/or renovated units. Key partners include the DC Department of Human Services (DHS), the Housing Authority (DCHA), and the DC Housing Finance Agency (DCHFA). The Department of Mental Health has also made funds available to DHCD, as well as the Office of Aging. Strategies to ensure the supply will include:

- Continue to develop memorandums of understanding between District agencies to provide frameworks for production.
- DHCD will work with DHS to continue to monitor and report on funding for housing that meets the needs of this population, using existing key performance indicators and HUD's Consolidated Annual Plan Evaluation Report (CAPER) process.
- Build upon a pilot Consolidated Request for Proposal process to help projects reach completion more quickly.
- Work closely with DCHA and HUD to make sure housing vouchers are available for people who are homeless.
- Collaborate with the Office of the Deputy Mayor for Planning and Economic Development (DMPED) to ensure the inclusion of a substantial number of extremely affordable and accessible housing units in the development at the Walter Reed Army Base.
- Ensure coordination and collaboration between all relevant agencies. Examples include DHCD and DCHA continuing to work together on each other's review boards, having regular conversations, and coordinating efforts with DHS, DMH, Office on Aging and DOH. The Interagency Council on Homelessness (ICH) can also play a role in ensuring that there is communication in these areas.

In order to monitor progress in this area, the ICH has created a Permanent Supportive Housing Production Committee, co-chaired by the Director of DHCD, to include representatives of both public and private service and housing agencies that will report at least annually and preferably quarterly to the ICH on progress made. Tasks will include developing an annual strategy to include recommended set-aside resources for production, developing a consolidated application process and monitoring progress on past consolidated applications awarded, and monitoring PSH production accomplishments. The committee should review information on what is in the DHCD pipeline for approved and pending projects as well track the Local Rent Supplement Program

(LRSP) under the DC Housing Authority, both of which will be critical to ensure sufficient permanent supportive housing and permanent housing units.

2. *FINANCIAL RESOURCES AVAILABLE AND STRATEGICALLY LEVERAGED*

Redesigning these systems will require the District to leverage funding in the local budget, from federal funding opportunities, and from private philanthropy. Some local resources will need to be re-allocated. The District will also be aggressive in applying for HUD funding and other federal funding for subpopulations. It appears that additional funding will be available for housing vouchers through HUD. DC will also make it a priority to incorporate HEARTH Act requirements into its activities. The District also has a wide range of private funders that are invested in ending homelessness and would like to create structures that would encourage partnership as well as an alignment of goals and outcomes.

In order to monitor progress in this area and per the Homeless Services Reform Act (HSRA), District agencies will report annually on their budgets at ICH meetings. ICH will also convene a subcommittee to work on creating funding vehicles for a public-private partnership and to encourage investment by private philanthropy.

3. *TRACK OUTCOMES REGULARLY*

As the systems are redesigned, it will be critical to monitor progress and, if something is not working, to make adjustments. A long-term data collection strategy will need to be developed. Key areas to look at will include the number of people prevented from becoming homeless as well as the length of stay in various parts of the system. Mechanisms need to be in place to ensure that everyone is tracking the same data and a software system where data can be easily collected and evaluated. There also needs to be a universal assessment strategy and instrument that enables the system to capture necessary data. Performance based contracting will require setting baseline numbers as well as appropriate benchmarks and targets.

Outcomes

In order to track the effective use of resources, the District is proposing to track the outcomes identified below to ensure effective, quality services for clients. For each area, it will be important to identify baseline numbers so that progress can be measured, as well as benchmarks that are appropriate for various types of programs and clients. As discussed in Critical Success Factors above, it is critical that data collection and evaluation systems are in place for impact of the proposed redesigns to be measured. Note that nine of these goals measure how well the system of care helps those who interact with it. That last goal is more system focused, to analyze the effectiveness of interventions in reducing the cost burden on the public and emergency service systems.

This Plan envisions that these goals will be monitored and reported on to the Interagency Council on Homelessness at least annually, but preferably quarterly. Significant improvements in outcomes will take time, but data will allow all stakeholders to be on top of trends, things that are working, and areas for improvement.

TABLE 3.4: HOMELESSNESS MIGRATION GOALS

Goal	Measure	Relevant Components/Partners	Comments
1. Reduce length of homelessness for families and individuals.	% of families/individuals placed in permanent housing within 30/60/90 days	Prevention, temporary housing, low barrier programs	• Over time, the proportion returning to housing within 30 days should increase. • Pertinent only to households remaining in shelter at least 14 days. • Standard-setting for components requires benchmarking. • Providers will need training and resources.
2. Reduce return to homelessness.	% of families/individuals returning to homelessness within 6/12/18/24 months of program exit	Interim housing, permanent housing, permanent supportive housing	• Over time, the percentage in shorter time frames should shrink and percentage in longer time frames should increase. • Needs better data system to track, including openness/sharing.
3. Increase income from employment.	% of families/individuals who increase income from employment between program entry and exit	Prevention, interim housing, permanent supportive housing Partners: Dept of Employment Services (DOES), employment assistance providers	• Put DOES terminals and staff in Resource Centers, shelters. • Need to assess for employment and track employment in system. • Could also do over time after program exit; requires follow-up survey.
4. Increase income and supports from public benefits and services.	% of eligible families/individuals who gain access to benefits/services between program entry and exit	Prevention, interim housing, permanent supportive housing Partners: DHS, DMH, DOH, Social Security Administration, Veterans Administration, DC Housing Authority	• Includes cash, in-kind, health, and behavioral health benefits/services. • Ultimate goal is financial independence for those who can. Benefits receipt would be for as long as is needed, reducing dependence over time. • Could also do over time after program exit; would require follow-up survey.
5. Prevent homelessness following institutional exit or release.	% of relevant exiters going to stable housing with appropriate supports	Prevention and Diversion, permanent supportive housing Partners: Dept. of Corrections (DOC), DMH, APRA, and	• This is the single most effective step a system can take for <i>preventing</i> chronic homelessness. • Mental health, corrections, child welfare, substance abuse, hospitals/primary health care

TABLE 3.4: HOMELESSNESS MIGRATION GOALS

		possibly also private Emergency Rooms, hospitals, primary health care centers	would each need to look to their own systems, and change to be able to identify formerly and/or imminently homeless clients.
			• Would require significant new structures and data collection. Would also require extensive outreach and training efforts. • Start with one agency, possibly DOC, which is already working to improve discharge for those with disabilities. • Over time, percentage in shorter time frames should shrink and percentage in longer time frames should increase. • Needs better data system to track, including openness and sharing of data.
6. Reduce individuals/ families that become homeless through eviction or ejection.	% avoiding eviction/ejection after receiving mediation, rent/utility assistance, family/friend negotiation, etc., within 6/12/18/24 months after assistance ends	Diversion, prevention	
7. Reduce second prevention requests.	% returning for assistance within 6/12/18/24 months after assistance ends	Diversion, prevention	Over time, percentage in shorter time frames should shrink and percentage in longer time frames should increase.
8. Increase stability in permanent housing.	% placed in PH/PSH who remain 6/12/18/24 months	Permanent housing, permanent supportive housing	Length of stay should increase over time. Should still track and report as continuing success if a person leaves for more independent or more appropriate housing that is stable.
9. Tenants experience improved quality of life.	Improvements on Quality of Life scale	Permanent housing, permanent supportive housing	Would require new data collection. Could also compare situation before homelessness, while in program, and after.
10. Reduce cost burden on DC's public and emergency service systems.	Change in average cost to "system X" or "all crisis public systems" from 1 or 2 years before housing placement to 1 or 2 years after	Permanent housing, permanent supportive housing	Would require new data collection, cross-system records matching.

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Chronic Homelessness

Ending chronic homelessness was the major impetus for the development of the District of Columbia's ten year plan to end homelessness. Data for shelter users in the District mirrored the national trends which motivated HUD to call for the development of such plans. A relatively small proportion of the overall homeless population

consumed a significant portion of resources because of the chronic use of homeless shelters and other publicly funded services

For the past five years since the development of the ten year plan to end homelessness, the primary focus of the District's Continuum of Care has been shifted from shelter to housing. Permanent supportive housing now makes up the largest share of the resources in the District of Columbia's continuum of Care. In fiscal year 2008, permanent supportive housing represented 36% of the total resources spent in the District for homeless housing and services.

As of January 2010, the District's Permanent Supportive Housing Program has provided housing and supportive services to 1,007 individuals and families who are extremely vulnerable and have experienced long episodes of homelessness. This focus on the chronically homeless has resulted in a significant decrease in the number of chronically homeless living in shelters or on the streets.

President Obama has expressed his commitment to supporting programs in the District of Columbia. \$17 million has been allocated to provide additional permanent supportive housing for approximately 150 homeless families and 350 homeless individuals. This will allow even more of the chronically homeless population to be housed.

3

Homelessness Prevention

Homeless Programs

New federal resources available under the American Recovery and Reinvestment Act (ARRA) for the prevention of homelessness and for helping people move out of homelessness quickly will be used in conjunction with the Emergency Shelter Grant's (ESG) prevention resources. Most recently, the District has received \$7.5 million in funds through the Homelessness Prevention and Rapid Re-Housing Program (HPRP). Under this Presidential Administration, the US Department of Housing and Urban Development is continuing its trend of putting more funds into prevention and rapid re-housing. The following is a description of the HPRP as implemented in the District of Columbia by DHCD and DHS. Coordination of prevention efforts across agencies and sub-recipients is ongoing to prevent gaps in service and to eliminate duplicative service provision. Likewise, targeting resources is critical across the spectrum of prevention, re-housing, and more intensive permanent supportive housing options to ensure that the needs of individuals and families are met in the most cost effective way.

HOMELESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)

HPRP is aimed at preventing families or individuals from becoming homeless and helping people who have become homeless regain housing, through one-time supports or short-term subsidies.

Homelessness prevention.

- One-time payment of rent arrearages
- One-time payment of utility arrearages
- Case management services
- Legal services (landlord / tenant issues)

Rapid re-housing.

- Security deposit and first month's rent
- Short term rent subsidy (3 months extendable up to 18 months if necessary)
- Housing counseling and location assistance
- Case management services

Homelessness prevention resources provide short term assistance to those who are currently housed and at risk of losing housing Prevention assistance is available to District of Columbia residents who meet the following criteria.

- Household income is at or below 50% of the area median income (AMI),
- The household lacks the financial resources and support networks needed to obtain immediate housing or remain in existing housing;
- Household is at imminent risk of homelessness and would become homeless without this assistance;
- No appropriate subsequent housing options have been identified, AND
- Households demonstrates the ability to obtain and/or maintain stable housing through supportive services and direct financial assistance offered by the program, and be able to independently maintain housing at the conclusion of HPRP assistance

Rapid Re-housing Rapid re-housing provides temporary assistance to those who are homeless to obtain housing Re-housing assistance is available for District of Columbia residents who meet the following criteria.

- Household income is at or below 50% of AMI,
- Currently homeless (coming from street, shelter, or Transitional Housing/Treatment Programs), AND
- Demonstrated ability to obtain stable housing through supportive services and direct financial assistance offered by the program, and independently maintain housing at the conclusion of HPRP assistance.

Organizations providing HPRP assistance are the Community Partnership, the Community of Hope, Housing Counseling Services, and Catholic Charities Emergency assistance programs operated by the Community Partnership are co-located at the Virginia Williams Family Resource Center (the point of intake for homeless families) to maximize the opportunities to prevent homelessness

EMERGENCY SHELTER GRANT (ESG)

ESG funds are used in conjunction with ARRA funds and locally appropriated funds to provide a robust array of prevention services Historically, the District of Columbia's Department of Housing and Community Development (DHCD) has been the designated agency recipient of the Emergency Shelter Grant (ESG) and Shelter Plus Care Grant (S+C), administered annually by the United States Department of Housing and Urban Development (HUD). In this Consolidated Plan period and going forward, the District of Columbia designates the District's Department of Human Services (DHS) as the agency recipient of both grants. As a result, DHS will assume responsibility for all aspects of both grants including all reporting, tracking, monitoring, commitment and expenditure of funds in HUD's Integrated Disbursement Information System (IDIS) and other

applicable federal reporting systems DHS will also assume responsibility for the ESG and S+C portion of the consolidated planning and reporting process, but will coordinate with DHCD to ensure timely submission to HUD

EMERGENCY RENTAL ASSISTANCE PROGRAM (ERAP)

ERAP helps low-income District residents facing housing emergencies The program provides funding for overdue rent if a qualified household is facing eviction (including late costs and court fees). The program also supports security deposits and first month's rent for residents moving to new homes ERAP serves low-income DC households with children, elderly households (age 60 or older), and people with disabilities The amount paid on behalf of eligible families depends on a household's income and available resources, and is subject to certain limitations ERAP payments can only be used once per year for each eligible household There are four ERAP Providers The Community Partnership for the Prevention of Homelessness, Housing Counseling Services, Catholic Charities and the Salvation Army

Chronic Homelessness Priorities Please see above for further detail on the priority to assist chronically homeless individuals and families

3

Institutional Structure

DHCD collaborates closely with the Department of Human Services (DHS), the District government entity with overall responsibility for policy and programming on homelessness DHCD and DHS together administer Homelessness Prevention and Rapid Re-Housing Program (HPRP) for the District, and work in concert with numerous other agencies and stakeholders through the Interagency Council on Homelessness As discussed earlier, in this Consolidated Plan period and going forward, DHS will assume responsibility for ESG and S+C, a move which will enhance the coordination of resources to serve homeless individuals and families, and those at risk of homelessness

Interagency Council on Homelessness

The Interagency Council on Homelessness (ICH) is a group of cabinet-level leaders, providers of homeless services, advocates, homeless and formerly homeless leaders that come together to inform and guide the District's strategies and policies for meeting the needs of individuals and families who are homeless or at imminent risk of becoming homeless in the District of Columbia This body will be used to carry out the District's homeless strategy and is responsible for the implementation of the strategic plan

The ICH was established by the Homeless Service Reform Act of 2005 for the purpose of facilitating interagency, cabinet-level leadership in planning, policymaking, program development, provider monitoring, and budgeting for the Continuum of Care of homeless services.

AGENCY DIRECTORS AND DISTRICT OFFICIALS

- Neil O Albert, Office of the City Administrator (OCA)
- Leila F Edmonds, Department of Housing and Community Development (DHCD)
- Roque R Gerald, Child and Family Services Agency (CFSA)
- Stephen T Baron, Department of Mental Health (DMH)
- Devon Brown, Department of Corrections

- Millicent Williams, Homeland Security and Emergency Management Agency (HSEMA)
- Joseph P. Walsh, Jr., Department of Employment Services (DOES)
- Kerri L. Briggs, Office of the State Superintendent of Education (OSSE)
- Adrienne Todman, DC Housing Authority (DCHA)
- Robin-Eve Jasper, Office of Property Management (OPM)
- Dr. Pierre Vigilance, Department of Health (DOH)
- Cathy L. Lanier, Metropolitan Police Department (MPD)

COMMUNITY MEMBERS

- Cheryl K. Barnes, Homeless Advocate
- Michael Ferrell, Coalition for the Homeless
- Sue Marshall, The Community Partnership to End Homelessness
- Scott McNeilly, Washington Legal Clinic for the Homeless
- Kelly Sweeney McShane, Community of Hope
- Nan Roman, National Alliance to End Homelessness
- E. Schroeder Stribling, N Street Village
- Chapman Todd, Catholic Charities
- Joshua Greenberg, Pathways to Housing
- Brian Watson, Transgendered Health Empowerment
- Hilary Espinosa, Miriam's Kitchen
- Polly Donaldson, THC
- Jean Michele Giraud, Community Council for the Homeless at Friendship Place
- Donald Brooks, Homeless Advocate
- Gregory Faulkner, Advocate

NON-VOTING MEMBERS

- Vincent Gray, Chairman of Council of the District of Columbia (Non-Voting Member)
- Tommy Wells, Committee on Human Services (Non-Voting Member)

4**Discharge Coordination Policy**

The District of Columbia has a comprehensive Discharge Coordination Policy that comprised of policies and protocols for the discharge of persons from publicly funded institutions and systems of care, including foster care, health care, mental health, and corrections

Institutions***FOSTER CARE***

The foster care system is managed by the Child and Family Services Agency (CFSA). Twelve months prior to exiting the foster care system, an individual emancipation plan is written for each child. The emancipation plan includes: 1) a reason for discharge, 2) a summary of services that were provided during care, 3) a summary of the youth's education and medical history, 4) the estimated date of discharge, 5) anticipated living arrangements-including expected address and telephone number, 6) estimated personal budget, 7) sources of income and debts/assets, 8) aftercare services arranged and 9) youth specific plans to facilitate a successful and

stable discharge This emancipation plan is reviewed at a quarterly conference that includes the youth, their social worker, an adolescent coordinator, foster parent/caregiver/biological parent (as applicable), community based after care representative and any other significant individuals requested by the youth. The objective of the emancipation conference is to address any concerns the youth has about their imminent discharge, difficulties with transitioning to independence, expectations regarding the continuation with any services within the system, public benefits and additional aftercare services that may be needed to prepare for a successful discharge.

If youth exiting the foster care system have not found an independent housing option through the emancipation planning process, they are automatically referred to the CFSA funded Rapid Exit program. Through the assistance of eight Neighborhood Based Collaboratives located throughout the city, youth receive housing search assistance, supportive services and a short term flexible financial subsidy in the amount of \$4,000 to assist the youth in obtaining and maintaining their housing. Together with a Collaborative Case Manager, the youth creates a spending plan that determines the best way to allocate these funds and an action plan for maintaining their housing once the short term subsidy ends. In addition, the youth is encouraged to continue to engage the Collaborative after the subsidy ends to ensure that he/she is able to maintain housing stability. Through this coordinated and comprehensive discharge process that assists youth in preparing for independent living before and after discharge, CFSA in collaboration with Neighborhood Based Collaboratives ensure that youth do not enter the homeless Continuum of Care. The CFSA Rapid Exit program is modeled after the nationally recognized Community Care Grant program operated by the Community Partnership that is designed to prevent families at risk of becoming homeless from entering the Continuum of Care. In 2009, the CFSA Rapid Exit Program assisted approximately 150 youth with obtaining housing. Through this program these youth were diverted from entering the Continuum of Care for shelter and housing services.

HEALTH CARE

The Department of Health (DOH) has begun preliminary discussions on effective discharge planning for the homeless population. The agency does have some strategies in place to assist homeless persons exiting the hospital system who are deemed eligible for Medicaid. Hospitals serving homeless persons who are eligible for Medicaid are required to provide health related case management and create a discharge plan for the individual by a case manager. Physicians are not allowed to discharge a homeless person from a hospital without a discharge plan. Even if a discharge plan has been developed, physicians are not allowed to discharge homeless persons if in the physician's opinion, discharge would pose an unreasonable risk to the treatment or safety of the individual. Additionally, if a homeless person is in need of a Recuperative Care Facility they are to be transferred to one immediately. If a Recuperative Care Facility is not immediately available, a homeless person cannot be discharged until a space in the facility is made available.

The Department of Health has expressed challenges in developing a comprehensive discharge plan as hospitals can only bill limited case management services for homeless individuals and families. Homeless persons frequently have case management needs that are more intensive than discharge planning. The Department of Health has indicated that a community-based model of case management involving the coordination of health and social services would be more beneficial for homeless clients who often suffer from chronic health problems. These needs will continue to be assessed as a formal and expansive protocol is developed.

Since so many clients are shared, DOH plans to work closely with the Department of Mental Health (DMH), the hospital system and Medicaid to develop a formal discharge planning protocol. In the interim, the Community Partnership has trained providers at Contractors' Meetings and during site visits on HUD's policy of preventing individuals discharged from institutions from participating in McKinney-Vento homeless programs.

MENTAL HEALTH

The Department of Mental Health's (DMH) discharge protocol focuses on a close partnership with its contracted private, nonprofit Core Services Agencies (CSAs). Every consumer of the Department of Mental Health is connected to a CSA as their "clinical home" for DMH services. The CSA enters into a Human Care Agreement to provide treatment and rehabilitative services within the community. Before a patient is released from the city's mental health care hospital, St. Elizabeth's, he or she is evaluated by his or her doctor and connected to a CSA. At such time, a conference is scheduled with the consumer's CSA community support specialist and appropriate treatment and follow-up are arranged. Consumers must be discharged with enough medication until their next scheduled CSA appointment.

A consumer may only be discharged from a CSA if: 1) they have relocated out of state, 2) they are deceased; 3) they have refused all mental health services and the consumer's refusal has been documented in their clinical record that is verified by a psychiatrist, 4) they have been incarcerated or sentenced for incarceration more than one year; 5) they do not have a mental health diagnosis verified by a psychiatrist, and if they have not been located for ninety (90) days following numerous documented outreach efforts to locate them.

DMH also has a policy that any enrolled consumer that receives hospitalized care is able to apply for housing through their CSA. This means that any patient discharged from the city's public mental health facility has the opportunity to obtain housing and avoid entry into the shelter system. Housing services available to DMH include transitional beds, bridge rental subsidies and limited bridge loan funding. To expedite the housing process it is critical for each benefit application for consumers who want housing to be completed while the consumer is still in the hospital.

While DMH housing options are available, homeless clients' access to these housing solutions has not always been consistent. Therefore, the DMH Housing Division aims to approve completed housing applications for patients in the hospital within 48 hours. To improve patient access of these housing options in the future, the DMH Housing Division also plans to provide a bi-weekly vacancy list of available housing resources including CRFs and supported independent housing options to community providers. DMH also plans on creating more housing for its population over the next five years, and under its MOU with DHCD, 181 net new units are under development as of March 2010.

CORRECTIONS

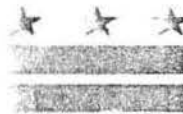
The management of the District of Columbia's corrections system is one of the most unique collaborations in the country. The city, which is defined as a federal district, has no state corrections system. Under the National Capitol Revitalization Act of 1997, the responsibilities of managing the D.C. Criminal Justice system were formally split between the Federal and District government. Offenders convicted of a felony are sent to distant prisons across the country. This prisoner distribution system is managed by the Federal Bureau of Prisons. The Federal Bureau of Prisons makes the sole determination as to whether a prisoner is returned to DC after serving his or her sentence. Like other states in the country, the DC municipal government has no authority or representation in the policy determinations of the Federal Bureau of Prisons. According to the Federal Bureau of Prisons Discharge Assistance document produced in April 2002, Corrections social workers are encouraged to direct prisoners exiting the Federal Prison System to HUD funded shelters (See p 3 Federal Bureau of Prisons Discharge Assistance Community Assistance). Possible changes to the Federal Bureau of Prisons discharge planning process would assist in ensuring that felony ex-offenders are not discharged from federal prisons to shelters.

Offenders that have not committed felonies are incarcerated through the District Department of Corrections. Locally, the DC Department of Corrections works closely with the Court Services and Offender Supervision

Agency (CSOSA), the federal agency that supervises men and women on probation, parole, and supervised release in the city. One of CSOSA's major policy priorities is to operate a comprehensive re-entry strategy to ensure public safety and reduce recidivism for prisoners returned to DC from Federal Prisons and offenders exiting the District Department of Corrections. The city's Discharge Planning Committee and CSOSA acknowledge that both unmet mental health needs and homelessness are two major causes for recidivism. Therefore, CSOSA developed the Transitional Intervention for Parole Supervision unit (TIPS). This office is dedicated to ensuring the successful return of ex-offenders to the community. Preparation for discharge begins with pre-release planning managed by a TIPS case manager. Each offender's discharge plan addresses critical areas of need from incarceration, through community supervision, to independent living in the community. The plan focuses on 1) Housing, 2) Education/Employment, 3) Substance Abuse, 4) Mental Health, 5) Identification and Benefits, 6) Life Skills and 7) Family/Community Support. TIPS staff attempt to ensure that Ex-offenders have a stable housing placement prior to exiting the halfway house. According to CSOSA about 25% of ex-offenders exiting the halfway houses return to family/friends. Those that do not return to family and friends often stay at halfway houses. One of the hallmarks of the Reentry Strategy is the Offender Reentry and Sanctions Center known as the RRC. This 102-bed halfway house, located on Massachusetts Avenue SE opened in September 2006. It is a 28 day residential program designed to serve persons that do not have a housing option in place at discharge. Residents without a place to stay after 28 days can request an extended length of stay at any half-way house facility of up to 120 days. According to CSOSA about 50% of all ex-offenders transition through RRC and five other halfway houses located throughout the city.

In addition to providing initial housing stability, the halfway houses provide crisis intervention, referrals, counseling, employment and substance abuse intervention. Since affordable housing options have become increasingly more difficult to access, TIPS has formed relationships with faith-based organizations. These faith-based organizations provide mentoring, employment assistance and occasional housing options to ex-offenders residing in halfway houses without support systems. According to CSOSA, hundreds of ex-offenders have taken advantage of faith-based partnerships to access ongoing supportive services. In addition the Department of Corrections has entered into a number of Memorandums of Agreement with Supportive Services Agencies throughout the city to provide medical care, pharmaceutical entitlements and housing search assistance to ex-offenders that have exited halfway houses. However, because funding is limited one of these Supportive Service Agencies, Unity Healthcare has applied for additional discharge planning assistance from the Robert Wood Johnson Foundation to provide among other things, housing options for ex-offenders with special medical needs.

The Discharge Planning Committee, a subcommittee of the Interagency Council is working with CSOSA to find reliable housing options to avoid homelessness for these ex-offenders. The subcommittee produced *A Comprehensive Public Sector Discharge Planning Policy to Prevent Homelessness in the District of Columbia*, which includes a zero tolerance policy on discharging offenders to the homeless system. However, dedicated funding for affordable housing options for ex-offenders has not been identified. In the interim, the Community Partnership has trained providers at Contractors' Meetings and during site visits on HUD's policy of preventing individuals discharged from institutions from participating in McKinney-Vento homeless programs.



Emergency Shelter Grants (ESG)

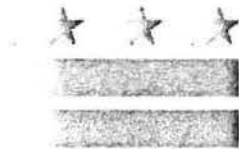
(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

3-5 Year Strategic Plan ESG response:

Historically, the District of Columbia's Department of Housing and Community Development (DHCD) has been the designated agency recipient of the Emergency Shelter Grant (ESG) and Shelter Plus Care Grant (S+C), administered annually by the United States Department of Housing and Urban Development (HUD). In this Consolidated Plan period and going forward, the District of Columbia designates the District's Department of Human Services (DHS) as the designated agency recipient of both grants. As a result, DHS will assume responsibility for all aspects of both grants including all reporting, tracking, monitoring, commitment and expenditure of funds in HUD's Integrated Disbursement Information System (IDIS) and other applicable federal reporting systems. DHS will also assume responsibility for the ESG and S+C portion of the consolidated planning and reporting process, but will coordinate with DHCD to ensure timely submission to HUD.

This change will ensure that ESG resources are closely aligned with the prevention and permanent housing goals articulated in the District's ICH 5 Year Plan, detailed within the Homeless chapter.

CHAPTER FOUR: COMMUNITY DEVELOPMENT



Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1 Priority Community Development Needs

The District's core community development needs are those activities which help improve the quality of life of residents through neighborhood revitalization and employment, promote economic opportunities for residents and business owners, residential empowerment, and support the District's overarching objective in creating complete sustainable neighborhoods. With these conceptual goals in mind, the District anticipates using Community Development Block Grant (CDBG) funding to support programs to:

1. Help the District develop complete sustainable neighborhoods, especially for those who have limited resources available to them. CDBG and other funds will be used to support acquisition, disposition, construction, rehabilitation, and de-leading of housing and property. Additionally, funds will be used toward fair housing activities, rental housing subsidies, homeownership assistance, and energy efficiency improvements. Funds will be used toward physical improvement to encourage sustainable neighborhoods within the District.
2. Bring federal, nonprofit and private partners together to expand the District's tax base, attract and retain businesses of all sizes, strengthen the business climate, and bring good-paying jobs to residents, particularly those residents who are low to moderate incomes.
3. Create vibrant and stable neighborhoods, rebuild retail corridors and ensure every District investment yields real benefits for residents and local businesses. The use of these funds will help the District preserve, enhance, and strengthen the physical character and quality of District neighborhoods. Priorities will be placed on projects that strengthen neighborhood identity, create more housing choices, guide growth, and improve environmental health. Finally, homeownership programs will be supported to help improve community stability by increasing homeownership rates in the District.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City and neighborhood. Public service activities that strengthen neighborhood organizations, provide employment, skills, and homebuyer training, and offer leadership opportunities to youth will be emphasized.

Section 108 Loan Activities

Section 108 loan guarantees remain a tool in the economic development toolkit of DHCD. However, in view of the fact that entitlements are shrinking while affordable housings and community facility needs continue unabated, DHCD is unlikely to use the Section 108 program as future entitlements could be put at risk.

2 **Basis for Assigning Priorities**

Priority levels for individual Community Development needs were derived from consulting with DHCD program managers and other DC agencies and through a community survey. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, and the anticipated formula grant funding levels.

Activities labeled as “High” priority in the tables below and elsewhere in the plan are those projects that will receive Consolidated Plan funding, assuming level funding of the City’s formula grants over the next five years. Activities identified as “Medium” priority are under those projects likely to receive Consolidated Plan funding if the applicable formula grants to the District are increased during the next five years. These projects could also receive outside funding if there is an extra need or push for the project. Activities that receive a “Low” priority are not likely to receive Consolidated Plan funding over the next five years.

A label of “Low” priority does not indicate there is no need for these activities in the District; only that funding for these activities is not actively contemplated by this Consolidated Plan. Many activities assigned as “Low” priority for CDBG funding are important needs for the community or high priorities for other sources of funding.

TABLE 4.1: COMMUNITY DEVELOPMENT PRIORITY NEEDS FUNDING

ACTIVITY	IDIS MATRIX CODE	PRIORITY
Acquisition of Real Property	01	H
Disposition	02	H
Public Facilities and Improvements	03	H
Senior Centers	03A	H
Homeless Facilities (not operating)	03C	H
Youth Centers	03D	M
Neighborhood Facilities	03E	H
Parks, Recreational Facilities	03F	L
Parking Facilities	03G	L
Street Improvements	03K	L
Sidewalks	03L	L
Child Care Centers	03M	M
Health Facilities	03P	L
Abused and Neglected Children Facilities	03Q	M
Asbestos Removal	03R	L
Operating Costs of Homeless/AIDS Patients Programs	03T	H
Clearance and Demolition	04	H
Senior Services	05A	H
Handicapped Services	05B	H
Legal Services	05C	H
Fair Housing Activities	05J	H
Tenant/Landlord Counseling	05K	H

TABLE 4.1: COMMUNITY DEVELOPMENT PRIORITY NEEDS FUNDING

Child Care Services	05L	L
Health Services	05M	L
Homeownership Assistance	05R	H
Rental Housing Subsidies	05S	H
Security Deposits	05T	L
Relocation	08	H
Loss of Rental Income	09	H
Removal of Architectural Barriers	10	H
Construction of Housing	12	H
Direct Homeownership Assistance	13	H
Rehab (Single Unit Residential)	14A	H
Rehab (Multi Unit Residential)	14B	H
Rehab (Commercial/Indu)	14E	M
Energy Efficiency Improvements	14F	H
Acquisition for Rehab	14G	M
Lead Based/Lead Hazard Test/Abate	14I	H
Code Enforcement	15	H
Residential Historic Preservation	16A	H
Non Residential Historic Preservation	16B	H
ED Technical Assistance	18B	H
Micro Enterprise Assistance	18C	M
CDBG Nonprofit Organization Capacity Building	19C	L
CDBG Operation and Repair of Foreclosed Property	19E	H
Planned Repayment of Section 108 Loan Principal	19F	H
Facility Based Housing-dev (HOPWA)	31J	H
Facility Based Housing-oper (HOPWA)	31K	H
Short Term Rent Mortgage Utility Payments (HOPWA)	31G	H
Tenant Based Rental Assistance (HOPWA)	31F	H
Supportive Service (HOPWA)	31E	H
Housing Information Services (HOPWA)	31I	H
Resource Identification (HOPWA)	31H	H

3 **Obstacles to Meeting Underserved Needs**

The primary obstacle to meeting underserved needs is funding. The lack of available funds which has been discussed elsewhere in this plan constrains activities and, in many cases, forces the District to choose among competing priorities, addressing only those that can be successfully accomplished using the available funds.

As discussed previously, while the District has ample federal employment opportunities, many jobs are held by non-residents, and the District has a high overall unemployment rate. Economic Development activities are often measured in terms of job creation, which in the District is meeting the needs of non-residents but not the needs of many lower-skilled residents. Meeting all of the employment needs in any community including the District can be compromised by factors and trends in the global, national, and regional economies that are beyond the control of the local jurisdiction. This is especially the case in today's economic downturn.

Not only have economic institutions suffered through this recession, but public service activities have been particularly hard hit due to funding cuts at the federal and state government levels. When combining this phenomenon with regulatory mandates that restrict program activities, these can pose obstacles to the success of public service and capacity building activities. Overall, the District understands the current federal budget restrictions, as well as limitations on local funding, and therefore is strategic in prioritizing programs and activities that make a significant impact on communities with demonstrated need.

4 **Specific Community Development Objectives**

The following table represents the specific community development objectives of the CDBG program. These objectives are funded specifically with CDBG resources, in congruence with other allocated resources, in order to create complete neighborhoods and a more sustainable city. The goals established are through the five year Consolidated Planning period FY 2011-2015.

TABLE 4.2: COMMUNITY DEVELOPMENT OBJECTIVES OF CDBG PROGRAM			
PRIORITY OBJECTIVE	HUD REFERENCE	MEASUREMENT	GOAL
Homeownership Assistance (direct)	DH-3.1, DH-3.2, EO-1.1	People	3,570
Homeownership Assistance (indirect)	DH-1.3, DH-1.4	Housing Units	900
Property Acquisition, Reclamation, Rehabilitation and Disposition	SL-3.3, SL-3.4, SL-3.5, SL-3.6	Properties	569
Rehabilitation (Single and Multi-family)	SL-1.1, SL-1.2, SL-1.3	Housing Units	1,740
Special Needs (Elderly, Disabled, Homeless) Housing	DH-1.2, SL-1.4, EO-1.2	Housing Units	895
Preservation Assistance (indirect)	DH-1.5	Housing Units	1,000
Inclusionary Zoning	DH-2.1	Housing Units	TBD
Affordable Housing Created-Reclamation	SL-2.1	Housing Units	285

Priority Community Development Projects

DHCD's community development primary objective is focused on implementing a community development plan that enhances the sustainability of the District within the regional context and holistically completes the fabric of the neighborhoods. Priority community development projects throughout the five year Consolidated Plan include

HOUSING RESOURCE CENTER

To build a more inclusive neighborhood and increase the number of District residents who utilize DHCD services, DHCD opened a Housing Resource Center in 2009. This center serves the community as a one-stop shop for housing services and referrals, including providing access to DHCD's searchable affordable housing database, dchousingsearch.org. Community access to the facility's services will continue throughout the five year plan.

INTERAGENCY COORDINATION

Through a recent partnership with the Department of Mental Health (DMH), DHCD is responsible for meeting a goal of financing the development of 300 affordable housing units for the exclusive use of DMH consumers. Through an additional partnership with the Department of Human Services (DHS), DHCD is responsible for meeting its goal of providing 45 units of permanent supportive housing to serve the District's homeless population.

HOUSING COOPERATIVES

Access to homeownership opportunities has become more difficult due to the national economic downturn. DHCD will leverage investments already made into housing cooperatives by coordinating with financial institutions in order to structure housing cooperative pools. These pools will enable tenant association members that have already purchased their buildings within a cooperative structure to reduce their cost of housing preservation, obtain new rehabilitated housing units and preserve their ability to reside within the District.

FORECLOSURE TECHNICAL ASSISTANCE

DHCD will provide technical assistance to borrowers who face financial difficulty or are nearing foreclosure due to current market conditions and require DHCD loan restructuring in order to preserve the affordable housing units.

COMMUNITY FACILITIES

Neighborhoods across the District rely on the development of community facilities for services such as childcare, healthcare, food provisions, job training, etc. Such facilities can be difficult to develop in the current economic climate, since many private lenders will not make loans for such projects, since loan repayment can be uncertain. As a result, DHCD will coordinate with local financial institutions that have been awarded New Market Tax Credit allocations, so that a modest investment from DHCD can catalyze a larger investment from equity providers – all with the goal of financing the development of much needed community facilities in specific District neighborhoods.

HOUSING ASSISTANCE

DHCD will continue to develop housing assistance programs throughout the five year plan. Recently, in an effort to assist and encourage employees to live and work in the District of Columbia, DHCD added a non-traditional affordable housing assistance incentive program, the Negotiated Employee Housing Assistance Program (NEAHP), to its two existing programs, HPAP and EAHP. It is a long-term goal of DHCD to partner

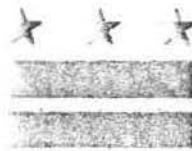
with other District agencies to establish homeownership for employees to live near their place of work in the District

SMALL BUSINESS ASSISTANCE

It is the goal of DHCD to improve small business development in the District. Through community-based, nonprofit organizations, project goals will help to support and strengthen existing businesses, broaden the commercial mix of stores, restaurants, and services, provide technical assistance to small businesses, and provide greater access to capital for small, neighborhood-based businesses

COMMERCIAL IMPROVEMENTS

DHCD will continue its efforts to provide grants, through community-based nonprofit partners, to retail and commercial property owners for the enhancement of retail and commercial facades in targeted commercial corridors of the District



Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.
2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic Plan Antipoverty Strategy response:

1 Antipoverty Programs and Policies

DHCD provides affordable housing in the District by subsidizing the financing of housing projects in order to designate a portion of units as affordable. Additionally, DHCD funds housing for extremely low, very-low and low-income residents, providing a stable home, as well as a means to build equity for the future, in the case of homeownership. DHCD also works with its network of Community-Based Organizations (CBOs) to provide housing counseling services such as home management and maintenance, improving credit, and household budgeting. These classes are geared toward improving residents' opportunities to obtain and retain decent housing with the prospect of moving toward ownership and the development of equity. Residents of buildings with expiring Section 8 protections are provided targeted assistance in locating housing options and are introduced to the DHCD-sponsored Tenant First Right to Purchase Program to move toward ownership.

The Tenant First Right to Purchase Program provides technical assistance, seed funds and earnest money to tenant groups to assist them in organizing so that they are prepared to take advantage of their first right of refusal when a building is for sale. The program also provides new tenant owner groups with management and technical assistance. Converted buildings are also eligible to apply to DHCD for rehabilitation funding. During FY2009, DHCD provided 1,248 tenant households with these services through technical service contracts with University Legal Services.

DHCD provides education and outreach to ensure that Fair Housing Laws are understood and that all residents are provided with information on their rights of access to housing in the District of Columbia. Assistance is provided in several languages. In addition, DHCD also contributes to the District's anti-poverty strategy by requiring developers to meet Section 3 requirements which provide employment opportunities for low income residents and business concerns.

District Coordination

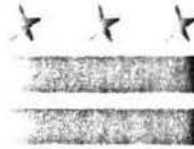
Partnerships across District agencies further assist in the reduction of poverty. For instance, the Department of Human Services (DHS) administers income support, welfare to work and a range of programs to support families and individuals. The Office of Tenant Advocacy (OTA) advocates for, educates, and provides outreach for tenants in the District of Columbia. The Office on Aging provides support services to seniors and partners with DHCD in the development of senior housing. The Department of Employment Services (DOES) provides extensive job training opportunities through its city-wide "One Stop Service Centers." The Workforce Investment Council (WIC) brings together private and public sector stakeholders to develop strategies to increase employment opportunities for DC residents and to support and to assist DOES in its employment mission. The DC Public School Administration has created career-oriented high schools in a number of specialized areas, including the Technology and Hospitality Industries to facilitate students progressing from school to real jobs in the District.

Additionally, DMPED manages the New Communities and Great Streets initiatives that address both physical and socio-economic educational needs of targeted areas by combining government resources with those of private and nonprofit developers or organizations to bring long-term and comprehensive revitalization to the designated area. "New Communities" is a comprehensive partnership to improve the quality of life for families and individuals living in distressed neighborhoods. DHCD administers one of the key resources for New Communities--the Housing Production Trust Fund. The companion program to New Communities is "Great

Streets.” Great Streets is a strategy to revive the local commercial corridors bordering the new communities so that the balance of services that neighborhoods need are restored along with the housing and social fabric.

2 Strategy for Reducing Poverty

Due to high poverty levels and limited resources, the District’s anti-poverty strategy is targeted at specific communities. To combat the underlying conditions that contribute to poverty and crime, the District will refocus its resources in “New Communities” and “Great Streets” initiatives. The initiatives are aimed at interrupting cycles of joblessness, crime, and physical deterioration by re-building the physical, educational, social and economic underpinnings of an entire geographic area, with the participation of the local residents. The goal is to retain current residents while bringing in new residents in a mixed-income environment. These initiatives are initially funded through securitization of \$6 million from the District Housing Production Trust Fund.



Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:



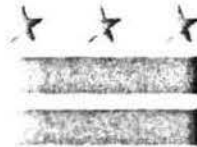
1 Low Income Housing Tax Credit

The District of Columbia Department of Housing and Community Development (“DHCD”) is the Agency assigned the authority and responsibility of administering Low Income Housing Tax Credits in the District of Columbia (“District”) by Mayor’s Order #87-72. The Portfolio Management Division of DHCD has the primary responsibility for managing LIHTC within DHCD. The Division allocates 9% Tax Credit to Developers for production of affordable rental Housing in the District. DC Housing Finance Agency, through delegated underwriting authority from DHCD, oversees the Tax Exempt Bond 4% tax credits. The allocation of the Low Income Housing Tax Credit (LIHTC) is done in accordance with the Internal Revenue Code Section 42, Treasury Regulation 1.42 and the District’s Qualified Allocation Plan (QAP). Federal law requires the District to adopt a plan to allocate the LIHTC to projects based on federally mandated requirements and priority needs determined by the District. The District’s QAP ensures that only those projects that comply with Federal law and address, on a priority basis, the housing needs of the District.

The LIHTC program was enacted by Congress in 1986 to provide owners of qualified properties with Federal tax incentives through the Internal Revenue Code for providing rental housing at affordable rents for households at low or moderate income levels. The income limits and rent restrictions for LIHTC properties are based on the Area Median Income for the District of Columbia published by the United States Department of Housing and Urban Development. Owners of tax credit developments have the responsibility to ensure that residents comply with the income restrictions and that the rents charged are within tax credit limits.

All Projects receiving allocation of tax credits after December 31, 1989 are required to enter into a Restrictive Covenant with the agency. The Restrictive Covenant adds an additional 15 years to the 15-year tax credit compliance period. DHCD monitors the ongoing compliance of LIHTC properties in the District by conducting physical inspections of tax credit buildings and reviewing tenant files to determine compliance with the rules and regulations of the LIHTC program.

CHAPTER FIVE: NON-HOMELESS SPECIAL NEEDS



Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Non-homeless Special Needs Analysis response:

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1 Priorities and Specific Objectives

Priorities and Specific Objectives for Special Needs Populations

DHCD's role in serving the needs of special needs populations is mainly financing housing for older individuals and persons with other special needs, and financing physical modifications that make single family homes accessible to persons with mobility impairments. DHCD also collaborates with other District agencies to ensure the full spectrum of special needs populations' requirements are addressed. In the District, five percent of all new housing units developed must be accessible to persons with mobility impairments, and another two percent must be accessible to persons with visual or hearing limitations. DHCD enforces this requirement for all of the projects that it finances. Adding accessible housing is particularly needed in the District because the vast majority of its housing stock was built before the Americans with Disabilities Act went into effect. Additionally, DHCD has partnered with the Department of Mental Health (DMH) to develop 300 units of housing for DMH consumers which includes individuals with severe mental illness, mentally and developmentally disabled individuals, former homeless persons, and graduates of the District foster care system.

In Fiscal Years 2011 to 2015, DHCD will continue to target the development of housing units for special needs population. Additionally, DHCD will continue to administer the following programs that aid in the development of special needs housing:

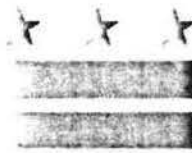
- Single Family Residential Rehabilitation Program,
- Multi-Family Housing Construction and Rehabilitation Program,
- First Right Purchase Program; and
- Handicapped Accessibility Improvement Program.

2 Use of Available Resources

DHCD anticipates a similar level of HUD funding as in recent years and will continue to support affordable housing for special needs populations with HOME and CDBG funding in Fiscal Years 2011-2015. As with its other housing and community development needs, the District's special needs housing programs require, whenever possible, maximum use of private financial resources. Because DHCD uses its funds to "close the gap" of needed financing for its selected projects, the private financing sector provides the bulk of each project's funds. Banks and other financial institutions serve as the private financing sources of all housing production, rehabilitation, or capital improvements and ongoing operations.

Many banks have special community lending operations, partly in response to the provisions of the Community Reinvestment Act, which encourages local lenders to invest in affordable housing and other community support projects. Several local banks have been active in supporting nonprofit affordable housing development. The District's public dollars leverage these private funds.

DHCD also works in tandem with nonprofit and semi-governmental development organizations to leverage funds for affordable housing and economic opportunity. In addition, the District government and nonprofit developers have actively reached out to capture foundation grants. Many nonprofit organizations seek foundation funding to provide social support services, especially to special needs populations. Among the organizations that are active in this area are the Fannie Mae, Meyer Foundation, Local Initiatives Support Corporation, and Enterprise Community Partners.



Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.
3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.
5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

1 **Non-Homeless Population Estimate**

Non-Homeless Populations Requiring Housing or Supportive Services

The housing needs of the District's most vulnerable populations vary with each group. Some require housing with specific physical attributes, such as wheelchair ramps or bathrooms with grab bars. Some require housing with on-site support services, such as meal service or job counseling. Most simply need housing that is safe, secure, and affordable. The table below contains estimated numbers of persons in categories identified as having particular housing and supportive service needs.

ELDERLY AND FRAIL ELDERLY

In the District, 26 percent of low and moderate income households are elderly, as described in the "Housing Needs" section in Chapter Two: Housing. As is true across the country, the population of seniors in the District is expected to increase dramatically as the Baby Boomer generation ages and life spans continue to increase. There will be a need for a broad range of senior living environments, serving residents across the income spectrum. This will be accompanied by a need for new programs, ranging from those that help seniors "age in place" through home retrofits to those that provide on-site nursing and health care in a congregate environment.

PERSONS WITH DISABILITIES

Data on the number of persons with disabilities in the District is limited. However, according to the 2000 U.S. Census, 21.9 percent of District residents over the age of five are disabled. Nationally, 19.3 percent of the U.S. population over the age of five is disabled. In terms of workforce, 21.1 percent of "working age adults" (ages 16 to 64) in the District are disabled, many of whom are unable to work.⁶² A quarter of those disabled adults earn incomes below the poverty line. Housing for disabled persons is not only limited by lower than average incomes, but also by the need for special design features such as wheelchair accessibility or supportive service, that are not readily available in the area.⁶³ Additionally, many elderly households have at least one disabled resident residing in the home. Table 5.1 shows the income breakdown of disabled elderly households. The majority of disabled elderly households make less than 30 percent of MFI.

TABLE 5.1: DISABLED ELDERLY HOUSEHOLDS⁶⁴			
Income		Current %	Current Number
<=30% MFI	Number of households	100.0	4,765
	Any housing problems	72.4	3,449
>30 to <=50% MFI	Number of households	100.0	882
	Any housing problems	57.1	504
>50 to <=80% MFI	Number of households	100.0	955
	Any housing problems	18.1	173
TOTAL <=80% MFI	Number of households	100.0	6,602
	Any housing problems	62.5	4,126

⁶² 2000 U.S. Census Bureau Washington, DC. Web. 03 Feb. 2010. <<http://census.gov/>>.

⁶³ Pettit, Kathryn, Leah Hendey, G. Thomas Kingsley, Mary Cunningham, Jennifer Comey, Liza Getsinger, and Michel Grosz. Housing in the Nation's Capital 2009. Rep. Urban Institute and Fannie Mae, 2009. Web. <http://www.urban.org/UploadedPDF/1001340_housingnationscapital09.pdf>.

⁶⁴ 2006-2008 American Community Survey Washington, D.C. U.S. Census Bureau IPUMS file. Prepared for DC DHCD by NeighborhoodInfo DC. 26 Feb. 2010.

PERSONS LIVING WITH HIV/AIDS

There are approximately 19,424 people living with HIV/AIDS in the District. This is more than three percent of the District's population, which according to United Nations definitions, makes it a severe epidemic⁶⁵. In fact, the District has the highest incidence of AIDS in the United States, with a rate nearly double that of New York or San Francisco. Many persons with AIDS require special housing suitable for long-term care, yet a recent District survey found that the local need was double the number of units available. For more information, see the "HOPWA" section later in this chapter.

The table below outlines approximate housing and supportive service needs, as well as units of housing and supportive services currently available to particular special needs populations.

TABLE 5.2: SPECIAL NEEDS HOUSING NEEDS⁶⁶

Special Needs Housing Needs		Needs	Currently Available	GAP	Priority Need	Plan to Fund?	Fund Source
Housing Needed	52. Elderly	22337	7549	14788	High	Y	TBD
	53. Frail Elderly	TBD*	TBD*	TBD	High	Y	TBD
	54. Persons w/ Severe Mental Illness	977	300	677	High	Y	TBD
	55. Developmentally Disabled	2322	1256	1066	Medium	TBD	TBD
	56. Physically Disabled	1066	TBD*	TBD	High	Y	TBD
	57. Alcohol/Other Drug Addicted	TBD*	150	TBD	Medium	TBD	TBD
	58. Persons w/ HIV/AIDS & their families	11,022	8537	2485	High	Y	TBD
	59. Public Housing Residents	48,748	8430	40318	High	Y	TBD
	Total	TBD	TBD	TBD			
Supportive Services Needed	60. Elderly	TBD*	53190	TBD	High	Y	TBD
	61. Frail Elderly	TBD*	TBD*	TBD	High	Y	TBD
	62. Persons w/ Severe Mental Illness	TBD*	12000	TBD	High	Y	TBD
	63. Developmentally Disabled	TBD*	2030	TBD	Medium	TBD	TBD
	64. Physically Disabled	TBD*	TBD*	TBD	High	Y	TBD
	65. Alcohol/Other Drug Addicted	12,700	8500	4200	High	Y	TBD
	66. Persons w/ HIV/AIDS & their families	1212	516	696	High	Y	TBD
	67. Public Housing Residents	16451	6322	10129	Medium	TBD	TBD
	Total	TBD	TBD	TBD			

*Data not available.

⁶⁵ "Encouraging News in the District's HIV/AIDS Epidemic" Washington Post. Washington Post, 10 Mar. 2010. Web. <<http://www.washingtonpost.com/wp-dyn/content/article/2010/03/29/AR2010032902984.html>>.

⁶⁶ Data for this table was obtained during discussion and coordination with a variety of District agencies and other entities as discussed earlier in the Plan. Specifically, information for elderly and frail elderly populations came from the District of Columbia Office of Aging (DCOA), particularly their FY2011-2013 State Plan available at <http://dcoa.dc.gov>, as well as CHAS. Information for persons with severe mental illness came from the District of Columbia Department of Mental Health (DMH), particularly their 2009 Housing Plan Recommendations, prepared by the Corporation for Supportive Housing's Mid-Atlantic Office. Information for developmentally and physically disabled came from the District of Columbia Department on Disability Services (DDS), and the District of Columbia Department of Health Care Finance (DHCF). Information for persons addicted to drugs or alcohol came from the District of Columbia Department of Health's Addiction Prevention and Recovery Administration. Information for persons living with HIV/AIDS and their families came from the District of Columbia HIV/AIDS, Hepatitis, STD, and TB Administration (HAHSTA), who collected in from each jurisdiction within the Washington, DC EMSA (Eligible Metropolitan Statistical Area), as required by HUD. Finally, information on public housing residents came from the District of Columbia Housing Agency.

2 Priority Housing and Supportive Service Needs

Priority Housing and Supportive Service Needs for Non-Homeless Populations

The table above indicates DHCD's identified relative housing and supportive services priorities for particular special needs populations. DHCD's reasoning for level of priority can be found in Section 3 below.

3 Level of Priority Special Needs Justification

Ideally, each of the above categories would receive enough funding to fully meet their unique and important needs. DCHD recognizes the critical importance of each category and that many District of Columbia residents rely on each type of housing and supportive service provision. DCHD also recognizes that there exists much overlap between categories and in many cases, these services are interdependent. However, resource limitations exist and therefore require tough financial decision-making. In determining priorities for special needs housing and supportive services, DHCD consulted broadly with District residents, advocates, nonprofit organizations, and other District agencies as discussed further in the "Managing the Process" and "Citizen Participation" sections in Chapter One. Other factors that went into determining priority include other known resources available to each population, dependency on DHCD for well-being, and linkages to related District priorities.

4 Obstacles to Meeting Underserved Special Needs

The largest obstacle to meeting underserved special needs in the District of Columbia is of course limited resources. Beyond limited funds, distributing special needs facilities across the District in an equitable manner constitutes a challenge due to high land costs in more affluent geographic areas. According to the District's Comprehensive Plan, one of the basic premises of the city's Vision is that special needs housing should be accommodated in all neighborhoods of the city and not concentrated in a handful of areas. While it would be unrealistic to propose that each neighborhood should have an identical number of such facilities, more can be done to avoid over-concentration. Steps can also be taken to reduce the stigma associated with special needs housing, and to improve its compatibility with the surrounding community. This will become even more important in the future, as displacement pressures in the downtown area and elsewhere threaten some of the city's emergency shelters and special needs service providers. Given limited budgets, the rising cost of land tends to drive special needs housing to the most affordable areas of the city, the very places where these uses already are concentrated.

Additional obstacles include the high cost of construction, a lack of land available for building new housing facilities, and the fact that a large proportion of the housing stock in the District was built before 1950 and is not accessible to physically disabled residents. For more information on obstacles to meeting underserved housing needs in the District, please refer to 'Barriers to Affordable Housing' section in Chapter Two: Housing.

5 Existing Facilities and Services

The table above describes existing housing and supportive services available and appropriate for special needs populations. Data for this table was obtained during discussion and coordination with a variety of District

agencies, and other entities as discussed in the “Managing the Process” section in Chapter One: General Information ”

6 Tenant-Based Rental Assistance Need Justification

As stated in Appendix B: HOPWA Consolidated Plan for the Washington, DC EMSA, federal funding has not kept pace with the HIV epidemic in the greater Washington, DC area. While the number of people living with HIV/AIDS continues to rise, reduced funding in other federally and locally funded housing programs has decreased. Additionally, the area has experienced a lack of affordable housing, a decrease in employment, along with a related prolonged client usage in long-term programming and decreased client movement into other federally funded long-term housing programs. These factors have resulted in exceptionally long waiting lists.

The use of HOPWA-funded tenant-based rental assistance has been critical in maintaining the health of this vulnerable population, the Washington EMSA would like to continue to use HOPWA funds to reduce homelessness in this population by supporting the tenant-based rental assistance program (Please see Appendix B for further information)

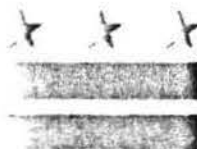


Housing Opportunities for People with AIDS (HOPWA)

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response:

All HOPWA funded facilities and services are directly administered by the District HIV/AIDS, Hepatitis, STD, and TB Administration (HAHSTA). Please refer to Appendix B for detailed information on this topic.



Specific HOPWA Objectives

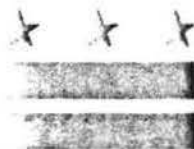
1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Specific HOPWA Objectives response:

[REDACTED]

All HOPWA funded facilities and services are directly administered by the District HIV/AIDS, Hepatitis, STD, and TB Administration (HAHSTA). Please refer to Appendix B for detailed information on this topic.

CHAPTER SIX: OTHER NARRATIVE



Other Narrative

Include any Strategic Plan information that was not covered by a narrative in any other section.

**DHCD has included a discussion on its Fair Housing Program in this chapter.*

Fair Housing

DHCD's Fair Housing program, launched in February 2001, addresses the growing need for fair housing education among the city's stakeholders and the need for agency policy and procedure to ensure agency programs are compliant with all civil rights regulations pertaining to fair housing and accessibility. Stakeholders include DHCD's Residential and Community Services and Development Finance Division grant sub-recipients, the nonprofit and for-profit sector partners, the various components of the housing industry, and District residents in general. The program promotes fair housing and equal opportunity in housing and ensures compliance with federal and local fair housing and equal opportunity laws, rules, and regulations by community nonprofit organizations, housing developers, other government agencies and individual residents who receive program and project funding through DHCD. The Fair Housing program achieves these goals through the following:

EDUCATION AND OUTREACH

The Fair Housing program aims to educate city residents—particularly underserved populations such as immigrant communities, people with disabilities, and the elderly—about their fair housing rights in rental, sales, financing or home insurance transactions

PARTNERSHIPS

The Fair Housing Program partners with other governmental agencies, nonprofit and private sector housing advocates and practitioners to affirmatively further fair housing and provide greater education coverage of housing and fair housing issues to a diverse community

AFFIRMATIVE MARKETING

As a recipient of HUD funding, DHCD follows HUD's regulations for the Affirmative Fair Housing Marketing Plan (AFHMP). DHCD has instituted and continues to enforce a certification process for all of its housing projects (new construction and rehabilitation) as well as acquisition. The certification process ensures compliance with federal and local laws and regulations and ensures that housing construction projects and programs are affirmatively marketed and accessible to all protected populations. The process of certifying projects and programs is educational for the sub-recipient, as their knowledge of fair housing compliance is enhanced thereby affirmatively furthering fair housing.

Through the AFHMP, DHCD aims to (1) bring greater diversity to areas that have been subjected to housing discrimination based on the residents' protected class, and (2) provide information about the availability of housing to persons not likely to apply for the housing without special outreach efforts due to (a) self or forced segregation, (b) linguistic isolation, (c) neighborhood racial or ethnic composition and patterns, (d) location, and (e) price of housing

DHCD has also instituted a certification process for all its program and service grants. The certification process for programs, singular in the metropolitan area, ensures that non-housing activities associated with new construction and rehabilitation projects, and programs providing services also abide by the affirmative marketing principle. As such, DHCD requires completion of an 'Affirmative Marketing Plan (AMP)' certification form for those types of projects. For housing projects, the AFHMP certification is submitted with

accompanying information on residential housing projects of five units or more, whether these are located in one parcel or a scattered multi-family project.

LANGUAGE ACCESS ACT

The Language Access Act of 2004 (LAA) is designed to provide greater access and participation by Limited or No-English Proficiency (LEP/NEP) persons to public services, programs, and activities. The District's implementation and monitoring of the LAA supports the Fair Housing Act's requirement of affirmatively furthering fair housing by ensuring equal opportunity and accessibility of program and services to all District residents. Since 2001, DHCD has partnered with both the Mayor's Office on Latino Affairs and the Mayor's Office on Asian and Pacific Islander Affairs, and subsequently with the Mayor's Office of African Affairs to ensure the agency's programs of concern to these communities were available in the appropriate languages.

The agency implemented the current Biannual Language Access Action Plan (BLAP) for 2009-2010 by adhering to the LAA's five action objectives. (1) a thorough review of each agency's mechanisms for data collection in order to design better outreach programs for target LEP communities, (2) the use of oral language (interpretation) services to ensure the agency's message on how to access programs and services reaches and is understood by these communities, (3) the translation of vital documents in the appropriate language of the community targeted which depicts agency information on how services are acquired or vital information which could have a direct impact to health or safety; (4) the training of staff on cultural competency, awareness and sensitivity, and (5) the creation of targeted (LEP/NEP) community educational outreach material to ensure language barriers do not impede District residents from accessing programs and services. Each District agency reports on its LAA advances to the Office of Human Rights (OHR) on a quarterly basis. These results are analyzed yearly and are the basis for the agency's bi-annual plans and changes as recommended by OHR. The next BLAP is currently being planned and will be produced for 2011-2012.

DHCD holds an annual diversity training to ensure its public contact personnel is well apprised of the law and compliance measures. For the past two years, the Agency has partnered with the Office of Human Rights to offer this training to its combined staff, and is expected to further training throughout this planning period.

Currently, DHCD ensures that all LEP communities have the agency's information through its sub-recipients and directly through the agency's website where a fact sheet about the pertinent programs can be found for easy download. The program information is available in Amharic, Chinese, Spanish, and Vietnamese. DHCD has also ensured that a bilingual interpreter is available at its public hearings, when needed.

The Housing Regulation Administration formerly located within the District Department of Consumer Regulatory Affairs (DCRA) joined DHCD in Fiscal Year 2008. This addition has brought new opportunities to further engage and outreach to the LEP community on DHCD programs and housing services.

DHCD aims to ensure that prospective buyers or tenants in the housing market area, regardless of their protected category—racial or ethnic groups—are given an opportunity to be informed about prospective housing development(s) across the city and feel welcome to apply. For example, DHCD's bilingual housing locator tool, DCHousingSearch.org is available free of charge online and over the phone.

SECTION 3

Section 3 of the Housing and Urban Development Act of 1968 (Section 3) provides training, employment and contracting opportunities for low and very-low income residents in jurisdictions receiving housing and community development program funding from the Department of Housing and Urban Development (HUD). DHCD is the District's point agency for applying and enforcing this regulation. DHCD implements this policy.

through: (1) projects funded by and through DHCD which awards funding grants to developers and its contractors; (2) partnerships with government agencies and community based organizations to facilitate or create training opportunities; and (3) the creation of employment and business opportunities for residents of and other qualified low- and very low-income persons residing in the District.

DHCD fully implemented its Section 3 program in Fiscal Year 2009 and the agency continues to expand the awareness of the Section 3 program through outreach and monitoring of all applicable projects. In 2009, all applicable Section 3 projects were monitored for Section 3 compliance. Implementation of the Section 3 policy included compliance monitoring of projects, data collection and developing awareness of the program. Additionally, implementation of the Section 3 Business Concern certification continued in order to facilitate compliance with the program. DHCD continued to partner with the DC Housing Authority, the Office of Small and Local Business Development, and the Department of Employment Services to create greater awareness of Section 3 among residents and businesses. DHCD continued to provide an annual training to all of its sub-recipients to ensure full compliance.

The Section 3 program within DHCD is aimed at creating greater opportunities for recruitment and employment of low- and very low-income residents and business interests by DHCD funded developers working on contracts partially or wholly funded through HUD. To further support the intent and letter of the Section 3 regulations, DHCD has extended the Section 3 provisions to its locally funded projects; all projects funded through the agency must abide by the Section 3 policy. DHCD is also creating a data bank of all Section 3 Business Concerns registered and certified through DHCD.

Before being awarded a DHCD grant, all contractors and businesses seeking Section 3 preference must complete a Section 3 Opportunities Plan as acknowledgement of the contracting and employment provisions required by Section 3.

Affirmatively Furthering Fair Housing

As an entitlement jurisdiction, the District must adhere to Section 808(e)(5) of the Fair Housing Act which requires DHCD to Affirmatively Further Fair Housing (AFFH) in the administration of its programs and activities. As part of this requirement, and in addition to this five year Consolidated Plan, DHCD must conduct an Analysis of Impediments to Fair Housing Choice (AI) in five-year intervals as mandated by the regulation. According to the HUD Fair Housing Planning Guide, an AI should include a comprehensive review of the District's "rules, regulations, business practices, administrative policies practices, and procedures, laws, legislation, and other factors created by the private and government sectors" which could directly or indirectly affect or create an impediment to "fair housing choice" in the District of Columbia. In addition, Section 104 of the Housing and Community Development Act of 1974 (24CFR Part 570.496(a) requires that each state to certify that it will affirmatively further fair housing.

ANALYSIS OF IMPEDIMENTS (AI)

To Affirmatively Further Fair Housing, the District is required to: (1) Conduct an analysis to identify impediments to fair housing choice within the jurisdiction; (2) take appropriate actions to overcome the adverse effects of any impediments identified through the analysis; and (3) maintain records reflecting the analysis and actions taken in this regard.

In December 2005, DHCD completed the most recent AI. This analysis looked at private and government sectors' actions, omissions, or decisions that may have an ultimate effect of restricting housing choice. The District

continues to address the four (4) major areas of impediments to fair housing choice found in the 2005 AI. These were:

- A lack of compliance of fair housing laws by the real estate and housing industry (real estate, lending/mortgaging, insurance/appraisals, etc);
- Decreasing number of affordable housing units for low and moderate-income households and special needs residents in target neighborhoods;
- Information on full range of housing available across many District neighborhoods offering affordable housing is not made available to individuals and families seeking homes due to segregated residential patterns; and
- Low levels of home buying literacy among particular protected classes and high levels of home seekers with no or poor credit history.

In 2007, DHCD added a supplement to the 2005 AI by providing further guidance on the implementations of recommendations, thus assisting DHCD to increase fair housing choice among the city's residents.

DHCD is in the process of completing the next five year AI, for FY 2011-2015. As part of this process, DHCD is conducting a series of roundtable discussions with selected advisory group participants. The advisory group(s), composed of key stakeholders, will ensure that the analysis reflects a cross-section of constituent views. In addition to these advisory group meetings, DHCD is conducting an investigative report that will provide a comprehensive analysis of the District's fair housing impediments. It is the goal of DHCD to have the AI completed early in FY2011; it will focus on addressing the impediments to fair housing choice found in the upcoming Consolidated Plan period FY 2011-2015.

Efforts to Remove Barriers to Affordable Housing

The District maintains support of measures to remove potential barriers to fair housing choice. Throughout the last five year planning period, the District worked to remove these barriers, some of which are identified below. Throughout this Consolidated Planning period, DHCD will continue to work toward these goals, and any newly identified goals, to remove barriers to affordable housing.

RENTAL HOUSING CONVERSION AND SALE AMENDMENT ACT OF 2005

The city continues to enforce the "*Rental Housing Conversion and Sale Amendment Act of 2005*" (Bill 16-050). This Act narrowed the 95 percent/5 percent loophole in the Rental Sale Conversion Act of 1980 which allowed rental property owners to circumvent the First Right of Refusal law thereby bypassing the tenant right to purchase their building once it was advertised for sale.

INCLUSIONARY ZONING (IZ)

Inclusionary Zoning (IZ) is a land use technique for developing diverse mixed-income communities by requiring each new residential development to make a percentage of the new units affordable to targeted incomes. IZ in the District began with a set of public hearings held by the Zoning Commission starting in 2005. The Zoning Commission divided the hearing process into three parts covering 1) the design of program, 2) where it would apply in the District, and 3) how IZ requirements would interact with existing zoning overlays. At roughly the same time, the Council of the District of Columbia passed both the Comprehensive Plan for the National Capital and the Inclusionary Zoning Act of 2006, which gave policy guidance and empowered the Mayor to administer the program. In August of 2009, the District implemented the District's

Inclusionary Zoning program, which affords private sector development companies the right to additional density for their projects in exchange for making at least 8 percent of the units in the project affordable.

OFFICE OF THE TENANT ADVOCATE (OTA)

Tenants often don't know their legal rights as renters, frequently can't pay for legal representation and usually don't know how to use lower cost court mediation and adjudication services. The OTA was started to respond to these needs of District tenants. For its first two years, OTA was housed within the Department of Consumer and Regulatory Affairs (DCRA). As of October 2007, the OTA is fully independent. The Chief Tenant Advocate advocates for, educates, and provides outreach for tenants in the District of Columbia.

HOUSING REGULATION ADMINISTRATION

In 2008, the Housing Regulation Administration which includes the Rental Accommodations Division, the Rental Conversion and Sale Division and the Rental Housing Commission—moved from the Department of Consumer and Regulatory Affairs (DCRA) to DHCD. This was, in part, an effort by the District to reduce barriers to fair housing by providing quicker response to apartment building conversion concerns which can affect low income and disenfranchised tenants.

COMMUNITY SERVICES

DHCD has improved processes in its Community Services programs to effectively address the needs of the underserved. It also continues to provide an annual training program for staff and funding recipients on fair housing and accessibility compliance for construction projects. DHCD continues to monitor all its sub-recipients to ensure compliance with fair housing and equal opportunity laws and regulations. Fair Housing staff is also available as a resource for constituents and service providers.

FAIR HOUSING SYMPOSIUM

In April of 2009, DHCD partnered with the DC Office of Human Rights and the Equal Rights Center to hold its Eighth Annual Fair Housing Symposium. The theme for the symposium was "Yes We Can! Prevent Housing Discrimination.", the symposium brought together experts from various housing arenas to discuss the most prevalent housing issues and their effect on District residents. The Symposium, a one-day free event for District residents, community based organizations, local government service providers, and industry professionals, was divided into three main panels as well as a presentation by a Keynote Speaker. The Ninth Annual Symposium took place on April 6, 2010.

REQUEST FOR PROPOSALS (RFPS)

DHCD's biannual RFPs solicit proposals from community development corporations (CDCs) and private sector firms interested in creating affordable housing or community development projects. During this process, DHCD holds several community meetings to educate developers about providing equal access opportunity to housing and building housing that is accessible to persons with mobility disabilities.

EDUCATION AND OUTREACH

The Department partners with nonprofit and private sector housing advocates and practitioners to affirmatively further fair housing and to provide greater education coverage of housing and fair housing issues to a diverse community. One method is to fund community based organizations (CBOs) to provide outreach and education for tenants on purchase programs, comprehensive homeownership and housing counseling, and assistance for relocation and location of apartments. DHCD has contracted with University Legal Services, Latino Economic Development Corporation, Lydia's House, and Housing Counseling Services, among others, to provide housing to provide these services.

ACCESSIBILITY EDUCATION AND ENFORCEMENT

DHCD continues to hold an annual mandatory Section 504 accessibility compliance training program for all sub-recipients. The training covers practical and regulatory actions concerning accessible housing according to local building codes and its parallels to federal regulations and laws, multifamily projects compliance with the Sec. 504 accessibility rules and regulations of the Rehabilitation Act of 1973 and the Fair Housing Act as Amended.

OFFICE OF HUMAN RIGHTS

The DC Office of Human Rights is an agency of the District of Columbia government that seeks to eradicate discrimination, increase equal opportunity, and protect human rights in the city. The Office enforces the DC Human Rights Act of 1977 and other laws and policies on nondiscrimination and fair housing. The Office is also the advocate for the practice of good human relations and mutual understanding among the various racial ethnic and religious groups in the District of Columbia.

DEPARTMENT OF INSURANCE SECURITIES AND BANKING (DISB)

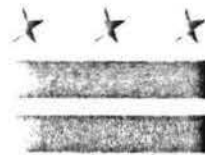
Part of DISB's mission is to protect District residents from financial fraud and abuse by providing fair and efficient supervision of financial-service entities. Through education, training and outreach, DISB works to protect the interests of District consumers from unfair and abusive practices, including predatory lending practices.

FORECLOSURE PREVENTION

The District provides funding to the nonprofit sector to provide outreach and education to residents victimized or at risk of a home foreclosure. Foreclosure prevention is intended to help educate borrowers and used as mitigation tool between the lender and borrower. The CBOs funded through DHCD provide foreclosure prevention training to residents in need. The training, provided in English and Spanish by some CBOs, seeks to provide individualized counseling, access delinquency status, and provide options and a work plan to prevent foreclosure. To further foreclosure prevention, DHCD convened an interagency alliance on foreclosure to ensure that all relevant District agencies are aware of current trends and can work together to develop appropriate outreach.

HOMEOWNERSHIP ASSISTANCE

Likewise, other housing agencies and nonprofit community development corporations also offer tools for assisting first time homebuyers and persons in crisis. The D.C. Housing Finance Agency has a Home Resource Center dedicated to education and training to first time homebuyers on homeownership opportunities. Additionally, DHCD-funded community based organizations offer housing counseling and foreclosure education and mitigation services to DC residents.



APPENDIX A: THE ANNUAL ACTION PLAN, FY 2011





DISTRICT OF COLUMBIA

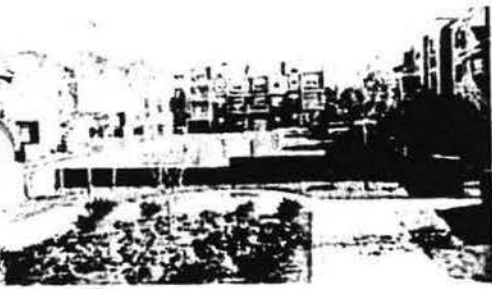
ANNUAL ACTION PLAN

October 1, 2010 TO September 30, 2011

Adrian M. Fenty, Mayor
Government of the District of Columbia

Valerie Santos, Deputy Mayor for
Planning and Economic Development

Leta Finucane Edmunds, Director
Department of Housing and Community Development
1800 Martin Luther King, Jr. SE, Washington, DC 20020, (202) 442-7200



Notice of Non-Discrimination

In accordance with the D.C. Human Rights Act of 1977, as amended, D.C. Official Code Section 2-1401.01 et seq., (Act) the District of Columbia does not discriminate on the basis of actual or perceived: race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, status as a victim of an intra-family offense, or place of residence or business. Sexual harassment is a form of sex discrimination which is prohibited by the Act. In addition, harassment based on any of the above protected categories is prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.

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ABBREVIATIONS

ADAP	AIDS Drug Assistance Program
ADDI	American Dream Down-payment Initiative
AFFH	Affirmatively Furthering Fair Housing
AFHMP	Affirmative Fair Housing Marketing Plan
AI	Analysis of Impediments (to Fair Housing Choice)
AMI	Area Median Income
ARRA	America Recovery and Reinvestment Act
CAPER	Consolidated Annual Performance Evaluation Report
CBDO	Community-Based Development Organization
CBO	Community-Based Organization
CDBG	Community Development Block Grant
CDC	Centers for Disease Control
CHDO	Community Housing Development Organization
CIP	Capital Improvement Program
CoC	Continuum of Care
CPP	Citizen Participation Plan
DCHA	D.C. Housing Authority
DCRA	Department of Consumer and Regulatory Affairs
DFD	Development Finance Division (DHCD)
DHCD	Department of Housing and Community Development
DHS	Department of Human Services
DMH	Department of Mental Health
DMPED	Deputy Mayor for Planning and Economic Development
DOES	Department of Employment Services
DOH	Department of Health
DSLBD	Department of Small and Local Business Development
EAHP	Employer Assisted Housing Program
EMSA	Eligible Metropolitan Statistical Area
ERAP	Emergency Rental Assistance Program
ESG	Emergency Shelter Grant
FHIP	Fair Housing Initiative Program
FRPAP	First Right Purchase Assistance Program
FY2011	Fiscal Year 2011
HAHSTA	HIV/AIDS, Hepatitis, STD, and Tuberculosis Administration
HAP	Homebuyer Assistance Program
HCVP	Housing Choice Voucher Program
HDS	Housing Development Software
HoDIF	Home Ownership Developers Incentive Fund
HoFEDD	Housing Finance for the Elderly, Dependent, and Disabled
HOME	HOME Investment Partnerships Program
HOPWA	Housing Opportunities for Persons with AIDS
HPAP	Home Purchase Assistance Program
HPRP	Homelessness Prevention and Rapid Re-Housing Program
HPTF	Housing Production Trust Fund
HQS	Housing Quality Standards
HRC	Housing Resource Center (DHCD)
HUD	U.S. Department of Housing and Urban Development
ICH	Interagency Council on Homelessness
IDIS	Integrated Disbursement and Information System
IZ	Inclusionary Zoning

LAA	Language Access Act of 2004 (District of Columbia)
LAHDO	Land Acquisition and Housing Development Organization
LBP	Lead-Based Paint
LEDC	Latino Economic Development Corporation
LIHTC	Low-Income Housing Tax Credit
LISC	Local Initiatives Support Corporation
LSDBE	Local, Small, and Disadvantaged Business Enterprise
LSW	Lead Safe Washington
MFI	Median Family Income
MOU	Memorandum of Understanding
NCRC	National Capitol Revitalization Corporation
NIF	Neighborhood Investment Fund
NOFA	Notice of Funding Availability
NRSAs	Neighborhood Revitalization Strategy Areas
OPM	Office of Program Monitoring (DHCD)
PADD	Property Acquisition and Disposition Division (DHCD)
P.A.R.T	Pre-Apprenticeship Readiness Training
QAP	Qualified Allocation Plan
RAD	Rental Accommodations Division
RCS	Residential and Community Services Division (DHCD)
RFA	Request for Applications
RFP	Request for Proposals
SAFI	Site Acquisition Funding Initiative
SFRRP	Single Family Residential Rehabilitation Program
TBRA	Tenant Based Rental Assistance
TPTAP	Tenant Purchase Technical Assistance Program
URA	Uniform Relocation Act
WASA	Waster and Sewer Authority
WIC	Workforce Investment Council

APPLICATION FOR FEDERAL ASSISTANCE (SF 424)

APPLICATION FOR FEDERAL ASSISTANCE (SF 424)

Application for Federal Assistance SF-424		Version 02
*1 Type of Submission	*2 Type of Application	* If Revision, select appropriate letter(s)
☐ Preapplication	☐ New	
☒ Application	☒ Continuation	*Other (Specify)
☐ Changed/Corrected Application	☐ Revision	
3 Date Received August 15, 2010	4 Applicant Identifier 53-6001131	
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 District of Columbia		
*b Employer/Taxpayer Identification Number (EIN/TIN) 53-6001131		*c Organizational DUNS 001367031
d Address		
*Street 1	1800 Martin Luther King Jr. Ave., SE	
Street 2	Suite 300	
*City	Washington	
*State	D.C.	
*Country		
*Zip / Postal Code	20020	
e Organizational Unit.		
Department Name Department of Housing & Community Development		Division Name Office of the Director
f Name and contact information of person to be contacted on matters involving this application		
Prefix.	Mr.	*First Name. Alan
Middle Name	R.	
*Last Name	Bray	
Title	Resource Management Specialist	
Organizational Affiliation	Employee	

APPLICATION FOR FEDERAL ASSISTANCE (SF 424)

*Telephone Number 202-442-7273		Fax Number 202-442-9280
*Email Alan.Bray@dc.gov		
*9 Type of Applicant 1 Select Applicant Type: D. Special District Government		
*Other (Specify)		
*10 Name of Federal Agency: U. S. Department of Housing & Urban Development		
11 Catalog of Federal Domestic Assistance Number		
FDAN	CFDA Title.	
<u>14-218</u>	<u>Community Development Block Grant (CDBG)</u>	
<u>14-239</u>	<u>HOME Investment Partnership Act Grant (HOME)</u>	
<u>14-231</u>	<u>Emergency Shelter Grant (ESG)</u>	
<u>14-241</u>	<u>Housing Opportunities for Persons with AIDS (HOPWA)</u>	
*12 Funding Opportunity Number _____		
*Title _____		
13 Competition Identification Number _____		
Title _____		
14 Areas Affected by Project (Cities, Counties, States, etc.) District of Columbia		
*15 Descriptive Title of Applicant's Project 		
16 Congressional Districts Of		
*a Applicant: District of Columbia		*b Program/Project: DC - all
17 Proposed Project:		
*a. Start Date 10/01/2010		*b End Date 09/30/2011

APPLICATION FOR FEDERAL ASSISTANCE (SF 424)

18 Estimated Funding (\$)						
	CDBG	HOME	ESG / Shelter Plus Care	HOPWA	Economic Stimulus	LOCAL
*a Federal	\$19,636,404	\$9,346,307	\$4,196,759	\$14,118,841	0	0
*b Applicant	0	0	0	0	0	0
*c State	0	0	0	0	0	0
*d Local	0	0	0	0	0	\$14,743,296
*e Other(Fund balance)	2,488,464	2,013,524	0	0	\$39,951,996	33,764,370
*f Program Income	10,000,000	1,000,000	0	0	0	0
*g TOTAL	\$32,124,868	\$12,359,831	\$4,196,759	\$14,118,841	\$39,951,996	\$48,507,666

*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)

☐ Yes ☒ No

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. Mrs. *First Name Lella

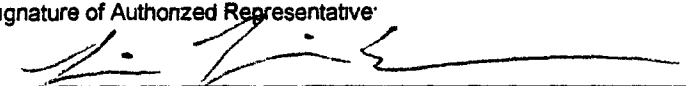
Middle Name Finucane

*Last Name. Edmonds

*Title Director

*Telephone Number. 202-442-7200 Fax Number 202-442-7078

* Email: Lella.Edmonds@dc.gov

*Signature of Authorized Representative:  *Date Signed 8/11/2010

Authorized for Local Reproduction

Standard Form 424 (Revised 10/2005)

Chapter One: General Information

Executive Summary

Fiscal Year 2011 (FY2011) will mark the first year of the District of Columbia's new Consolidated Plan. The Five Year Consolidated Plan Fiscal Year 2011 – 2015 includes specific objectives and priorities regarding how the District seeks to provide activities during the five-year period that promote a suitable living environment, decent housing and economic development. These objectives and priorities, designed to assist persons of low- and moderate-income, are carried out on a yearly basis through five Annual Action Plans, and they include:

- Preserve and increase the supply of quality affordable housing;
- Increase homeownership opportunities; and
- Revitalizing neighborhoods, promoting community development, and providing economic opportunities.

The Annual Action Plan is designed to guide housing, community development, homeless, and special population activities within the District of Columbia through the year 2011. The Action Plan is a collaborative process whereby a community establishes a unified vision for housing and community development during FY2011. Citizens, public agencies, and other interested parties, including those most affected, are provided opportunities to participate in every aspect of the consolidated planning process, e.g. identifying needs, setting priorities, recommending programs, developing proposals, and reviewing program accomplishments. The Department of Housing and Community Development (DHCD) is the District's agency responsible for preparing the Consolidated Annual Action Plan.

The FY2011 Action Plan is not only an application to the U.S. Department of Housing and Urban Development (HUD) for federal fiscal year 2010 funding; it is also a statement of the strategic activities that DHCD, as the District's designated program administrator, intends to undertake during FY2011 to implement the strategic goals set forth in the Five Year Consolidated Plan. The District will receive direct federal funding of over \$47 million from HUD for the Community Development Block Grant, (CDBG), HOME Investment Partnerships (HOME) program, Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Shelter Grant (ESG) / Shelter Plus Care (S+C) program. DHCD will also receive an additional \$40 million in Stimulus funding from HUD.

Fiscal Year 2011 Federal Entitlement Grant Allocations

Community Development Block Grant (CDBG) Allocation	\$19,636,404
HOME Investment Partnerships (HOME) Allocation	9,346,307
Emergency Shelter Grant (ESG) / Shelter Plus Care (S+C) Allocation	4,196,759
Housing Opportunities for Persons with AIDS (HOPWA) Allocation	<u>14,118,841</u>
Total:	\$47,298,311

The greatest single source of federal funding for DHCD's program and projects to be undertaken in FY2011 is CDBG. CDBG funding total, including the FY2011 allocation, anticipated program income, and FY2011 fund balance, is \$32,124,868.

Several projects will be funded through the use of HOME funds and anticipated program income, in the amount of \$12,359,831. Thirteen percent of the HOME funds are to be used for DHCD's "Home Purchase Assistance Program (HPAP)", which provides down-payment and closing cost assistance to qualified households. Shelter programs and certain homelessness prevention activities will be funded through the ESG/S+C program, with an allocation and fund balance of \$4,196,759, and administered through the D.C.

Department of Human Services. Lastly, the HOPWA program has an allocation of \$14,118,841, and the regional HOPWA allocation is administered through and monitored by the D.C. Department of Health, HIV/AIDS, Hepatitis, STD, and Tuberculosis Administration (HAHSTA).

The Department's funding will be used to accomplish numerous housing and community development activities, including, but not limited to, providing housing counseling to approximately 15,000 residents, assisting 400 residents in becoming homeowners, providing 800 businesses with technical assistance and/or façade improvements, and preserving or creating more than 900 units of affordable housing for low-to-moderate income residents.

Evaluation of Past Performance

During the past five years, DHCD subsidized thousands of units of affordable housing, homebuyer education and outreach, expanded homeownership opportunities to the District's increasingly diverse populations, and contributed to economic and community revitalization.

DHCD provided loans for down-payment and closing costs for new first-time homeowners through its Home Purchase Assistance Program (HPAP). DHCD also assisted tenants toward homeownership by assisting them in acquiring and converting their rental units for condominium or co-op ownership under the First Right Purchase Assistance and Tenant Purchase Technical Assistance Programs. DHCD also assisted single-family owner-occupants to remain in their homes by providing loans and grants for rehabilitation, including lead-based paint hazard control and replacement of lead water pipes.

DHCD increased the supply of affordable housing through funds provided for multi-family rehabilitation and/or for pre-development loans for new multi-family and single-family construction projects. DHCD also provided housing counseling to tenants, home buyers and new homeowners to increase access to affordable housing. Emergency Shelter Grant (ESG) / Shelter Plus Care (S+C) funds provided emergency assistance to prevent households from becoming homeless and to provide shelter for families.

DHCD's affordable housing construction projects spurred neighborhood revitalization and local economic development. As part of its neighborhood investments, DHCD funded technical assistance for small neighborhood businesses to assist in their retention and expansion. DHCD also provided funding for façade improvement projects for small businesses.

General Questions

Geographic Priority Areas

Through our city-wide citizen participation process, DHCD identified several areas for targeted investment. (Appendix D) These areas will remain a priority for DHCD through 2011.¹ The rationale for prioritizing investment in these areas is that these areas meet the characteristics of the priority areas outlined in the District's FY 2011-2015 Consolidated Plan.

The targeting of investment to these areas is anticipated to result in an increase in affordable housing opportunities for households that have experienced the pressure of rising housing costs. It also will leverage private investment to ensure that neighborhood-serving commercial opportunities and community facilities/services are created and maintained. DHCD will also support Administration initiatives to revitalize "New Communities" and to restore commercial corridors in the "Great Streets" program.

¹ For the purposes of describing its investments and activities, DHCD cannot identify the exact location of activities to be undertaken, but specifies the target area (in compliance with HUD guidelines), DHCD will not have made its development awards for FY2011 funding prior to the first quarter of the fiscal year.

DHCD will also continue to leverage its funds with financial vehicles such as the New Markets Tax Credit Program and a range of financial instruments and/or arrangements that help to increase affordable housing, home-ownership opportunities, jobs and economic opportunity, retention and attraction of neighborhood businesses, neighborhood revitalization, community and commercial facilities and improvements to the living environments of our residents.

In FY2011 DMPED will continue to promote the revitalization of District neighborhoods in order to create job opportunities, affordable housing, and vibrant and safe places to live and work and to improve the general quality of life of District residents. DMPED will continue to carry out activities to support the development and disposition of properties previously acquired with public funds (largely through the former urban renewal program), with the CDBG Program Income, the Great Streets Initiative projects, New Communities initiatives, Housing Production Trust Fund (New Communities) projects, and Neighborhood Investment Funds in targeted areas of the District.

Basis for Allocation of Funding

As in the past, DHCD will continue to allocate its funding to address the demographic changes and needs identified in the Censuses, in the Mayor's development priorities, and through DHCD's Needs Assessment Hearings and the concerns voiced by the community. DHCD's basis for allocation of resources is prioritized among specific target areas based on a four-tier system:

TIER ONE

Tier One focuses on projects that are currently in DHCD's pipeline and that tie into a regional vision of sustainability. These resources are meant to supplement DHCD's mission of creating complete neighborhoods and a more sustainable city. These resources will be focused primarily in Wards 5, 7, and 8, where development momentum has been or is being established, but where further investment is needed. The resources will extend throughout Ward 5 where focus will be on finishing development and continuing preservation, specifically in the Trinidad/Ivy City. In Wards 7 and 8, the resources will be distributed throughout specific corridors adjacent to Prince George's County, MD, where unemployment is high and resources are needed, specifically the Benning Road, Deanwood, Minnesota Avenue, Pennsylvania Avenue and Historic Anacostia corridors.

TIER TWO

Tier Two focuses on projects that are of high priority and develop coordination with other District agencies. These resources will be meant to provide finishing assistance to developing areas, continuing preservation and promoting economic viability through a more integrated approach. This tier will include working with the Deputy Mayors Office for Planning and Economic Development (DMPED) to finish the development of the Georgia Avenue corridor and specific area locations where development has been established, including Park Morton and the Bruce School. This tier will also prioritize resources in the Walter Reed development corridor and work with the Office of Planning (OP) in developing the St. Elizabeth's corridor.

TIER THREE

Tier Three focuses on areas of the city that are in general poverty and in need of development and revitalization. These tier resources will provide assistance to areas of the city that are not consistent with specific developing corridors, but will improve the livability of areas with underserved need.

TIER FOUR

Tier Four focuses on the entire city, to achieve economic integration of subsidized housing by providing mixed-income housing, or by locating affordable housing in neighborhoods that are not poverty impacted, or that are undergoing rapid gentrification. Mixed income housing would focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking

steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing.

These target areas include several neighborhoods where small area plans were conducted. Small area plans are conducted by the Office of Planning in cooperation with sister agencies to supplement the broad policy statement and public actions of the District's Comprehensive Plan. These plans are developed through a comprehensive process with the neighborhood residents and the District's agencies to provide detailed direction for the development of city blocks, corridors and neighborhoods with the goal of achieving complete neighborhoods. These small area plans help guide DHCD investment priorities through the 4 tier system, with each tier having a greater priority.

Obstacles to Meeting Underserved Needs

The major obstacle to meeting underserved needs, and all identified needs throughout the Action Plan, is the general lack of funding resources available, not only to DHCD, but to all public and private agencies who serve the needs of low-income and moderate-income residents. The current revenue forecast suggests the District was significantly affected by the national recession, with continued deterioration in local source revenues. However, unlike the rest of the nation, the economic forecasts through 2011 for the District have become slightly more optimistic.

In addition, the District's entitlement grants have not kept up with inflation and, in many cases, have been reduced, further limiting the funds available to address the needs in the community.

Sources of Funds

The Department relies on two sources of funding to finance housing and community development projects, programs, and project delivery costs. These include: 1) federal resources from HUD and program income; and 2) local resources composed of appropriated District funds and certain loan repayments. DHCD makes direct investments and uses funding to leverage private investments.

a. Federal Resources

FY2011 is the thirty-sixth year (CD-36) of the CDBG Program. HUD's Office of Community Planning and Development provided preliminary notice to DHCD that its FY2011 formula entitlement grant allocations were approximately \$47 million. (DHCD also anticipates an additional \$11 million in program income from these entitlements to be available in FY2011.) DHCD will also receive an additional \$40 million in Stimulus funding from HUD. The net available federal funds from these entitlement grants for FY2011 are shown in Table 1.

Table 1: FY2011 Federal Funding

	CDBG	HOME	ESG / S+C	HOPWA	Economic Stimulus
Allocation	\$19,636,404	\$9,346,307	\$4,196,759	\$14,118,841	0
Program Income	10,000,000	1,000,000	0	0	0
FY2010 Fund Balance	2,488,464	2,013,524	0	0	\$39,951,996
Total federal funds	\$32,124,868	\$12,359,831	\$4,196,759	\$14,118,841	\$39,951,996

DHCD and DMPED will serve as the administrator for the CDBG, HOME, and Economic Stimulus grants. The regional HOPWA allocation is administered through and monitored by the D.C. Department of Health, HIV/AIDS, Hepatitis, STD, and Tuberculosis Administration (HAHSTA). The Department of Human Services will administer the ESG / S+C grant allocation. Federal grant funds are distributed through DHCD's, DHS's and HAHSTA's various programs.

b. Program Income

There is a total of \$10,000,000 in program income dollars projected to be collected for the CDBG program and \$1,000,000 is projected to be collected in program income dollars for the HOME program. Program income is derived primarily from repayment of loans provided to citizens to assist in the purchase of homes within the District. Program income received in excess of the budgeted amount is reprogrammed for use with the respective program.

c. 2009 Recovery Act - Economic Stimulus Package

In February of 2009, President Obama signed the America Recovery and Reinvestment Act (ARRA) in an effort to stem a protracted and widespread recession in economic growth. These funds were made available during FY2009 and the utilization of these funds will be reported on as activities occurring in FY2010 and FY2011.

In FY2011, DHCD will approximately \$40 million dollars of these funds to modernize homes to make them energy efficient, support a broad range of housing and community development projects that are ready to go, and help the families and communities hardest hit by the economic crisis including people who are on the brink of homelessness or have recently become homeless.

d. Section 8

The D. C. Housing Authority (DCHA) receives, administers, and monitors funds for the Section 8 Program, known as the Housing Choice Voucher Program (HCVP). DCHA estimates that its budget for the HCVP program will be \$173.5 million, a 3% increase over the FY2010 budget. The Section 8 funds are used to increase affordable housing choices for very low-income households by allowing families to choose privately owned rental housing. The funds are not part of the DHCD budget, but may be used by low-income families to obtain affordable housing in projects funded by DHCD.

e. Low-Income Housing Tax Credits

The Low-Income Housing Tax Credit (LIHTC) Program was enacted by Congress in 1986 to provide owners of qualifying properties a federal tax incentive with the Internal Revenue Service for providing rental housing at affordable rents for individuals and families of low or moderate income levels. The income limits and rent restrictions for LIHTC properties are released annually by the United States Department of Housing and Urban Development. Residents of tax credit units are required to be within the income limits and owners of tax credit housing are required to meet the rent restrictions for tax credit units.

The Internal Revenue Service charged the administration of the LIHTC program in the District of Columbia to the Department of Housing and Community Development (DHCD). Final regulations for "Compliance Monitoring and Miscellaneous Issues Relating to the Low-Income Housing Credit" were released by the Internal Revenue Service in the Federal Register, Volume 65 – Number 10 on Friday, January 14, 2000 and as further amended.

Owners of rental housing receiving an allocation of tax credits from the District of Columbia DHCD *after* December 31, 1989 are required to enter into a Restrictive Covenant with the agency. The Restrictive

Covenant adds an additional 15 years to the 15-year tax credit compliance period. As mandated by the Internal Revenue Service, the DHCD is charged with insuring the on-going compliance of Low Income Housing Tax Credit properties in the District of Columbia by conducting monitoring. DHCD meets this requirement by conducting physical inspections of the project's buildings and tax credit units, as well as review of the tenant files to determine their status with the rules and regulations of the Low Income Housing Tax Credit Program.

The Low Income Housing Tax Credit Program estimated revenue from fees for FY2011 is \$704,580.

f. Local Resources

According to the Mayor's FY2011 proposed baseline budget, the funds projected from local resources total \$48,507,666. Appropriated and local funds are broken down in Table 2.

Table 2: FY2011 Proposed Local/Other Funds Allocations

	Intra-District / Miscellaneous	Local Appropriation	Loan Repayments	Unified Fund
FY2011 Revenue	\$24,358,000	\$12,063,777	\$2,183,535	0
Fund Balance	3,671,884	0	0	\$6,230,470
Net available funds	\$28,029,884	\$12,063,777	\$2,183,535	\$6,230,470

****Intra – District funds consist mostly of HPTF funds**

The Housing Production Trust Fund (HPTF or "Fund"), authorized by the Housing Production Trust Fund Act of 1988 as amended by the Housing Act of 2002, is a local source of money for affordable housing development. Capital for the Housing Production Trust Fund is supplied from the legislated share of DC deed recordation taxes and real estate transfer taxes, currently 15%. The Fund is designed to direct assistance toward the housing needs of the most vulnerable District residents—very low- and extremely low-income renters.

Pending the receipt of feasible project proposals, the statute requires that:

- A minimum of 40 percent of all Fund monies disbursed each year must benefit households earning up to 30 percent of the area median income (AMI);
- A second minimum of 40 percent of the Fund monies must benefit households earning between 31 and 50 percent of the AMI;
- The remainder must benefit households earning between 51 and 80 percent of the AMI; and
- At least 50 percent of the Fund monies disbursed each year must be used for the development of rental housing.

The remainder of the Funds may be used for, but are not limited to, for-sale housing development, single family housing rehabilitation, and loans and title-clearing costs associated with the Homestead Program.

In FY2005, DHCD launched a new HPTF Site Acquisition Funding Initiative (SAFI), which combines HPTF money with money from private lenders to provide loans to non-profit housing developers to facilitate acquisition of sites for affordable housing. The rapid pace of escalation in the District of Columbia's real estate market makes this initiative necessary to retain land parcels for the housing needs of low-moderate-income residents.

DHCD also receives separate, local budget appropriations and repayments on loans originally funded with local dollars, for its Home Purchase Assistance Program, which it uses to make more homebuyer assistance loans. Under Other Funds, there will be an estimated \$6,230,470 in the Unified Fund, which are funds given to us by DCRA.

g. Private Funds and Leveraging

The grant award criteria for the District's housing and community development programs require the maximum use of private financial resources. Because DHCD uses its funds to "close the gap" of needed financing for its selected projects, private financing sector generally provides a significant portion of each project's funds. Banks and savings and loan institutions serve as the primary financing sources of all housing production, rehabilitation, or capital improvements. Many banks have special community lending operations, partly in response to the provisions of the Community Reinvestment Act, which encourages local lenders to invest in affordable housing and other community support projects. Several local banks have been active in supporting nonprofit affordable housing development. The District's public dollars leverage these private funds. DHCD also works in tandem with non-profit and semi-governmental development organizations to leverage funds for affordable housing and economic opportunity. In addition, the District government and nonprofit developers have actively reached out to capture foundation grants. Many nonprofit organizations seek foundation funding to provide social support services, especially to special needs populations. Among the organizations that are active in this area are the Fannie Mae Foundation, Local Initiatives Support Corporation (LISC), and the Enterprise Foundation.

h. Matching Funds

Three HUD programs require matching funds: HOME, ESG and Lead Hazard Control. Under 24 CFR 92.218 *et. seq.*, the District must provide a matching contribution of local appropriated funds to HOME-funded or other affordable housing projects as a condition of using HOME monies. The District's FY2011 contribution will not be less than 25 percent of our non-administrative HOME draws.

DHCD meets its HOME obligation through contributions from the Housing Production Trust Fund. Eighty percent of all HPTF funds must benefit households earning up to a true 50 percent of the area median income, which is below the HOME income eligibility maximum; moreover, HPTF-assisted rental projects must be affordable for 40 years, which exceeds the HOME affordability period requirement. In FY2011, the Department's HPTF budget is \$28,029,884. As the Department incurs HOME match-eligible expenses, it will ensure that adequate funding is provided for the matching contribution.

In addition to its federal ESG funds, the District of Columbia provides local match dollars to support outreach and prevention services; support shelter operations and fund renovation of shelter space. The District works to provide assistance for the homeless through community-based organizations, faith-based organizations and other non-profit service providers.

DHCD matches its Lead Hazard Control monies with local funds. This funding is used to abate lead-based hazards in single- and multi-family properties.

i. Capital Dollars

The District Capital Improvement Program ("Capital") funds various modernization, acquisition and improvement efforts. The Department of Housing and Community Development receives an annual allocation of Capital funds for activities in the Property Acquisition and Disposition Division. In FY2011 the proposed Capital allocation is \$4 million. These activities consist of acquisition, assemblage, site preparations, and demolition and stabilization of property to promote housing, affordable housing, and

economic development opportunities. Projects for acquisition are identified in areas where the District can make an investment to enhance and compliment development opportunities or projects being undertaken by the private or non-profit sectors, as well neighborhoods with substantial concentrations of vacant and abandoned property. Once the property is owned by the District, Capital funds pay for costs related to the rehabilitation and the stabilization of the real property.

In 2009, DHCD relocated to a new headquarters building in historic Anacostia, combining all of its divisions under one roof and featuring a new Housing Resource Center on the street level. The vision of the new resource center is to offer the public a one-stop shop for information and services on all DHCD programs, although DHCD's divisions do not share a common IT system for linking customers to similar programs and services across the Department.

In FY2011, DMPED will expend approximately \$9M of DMPED capital funds for New Communities initiatives, which will assist in continuing the redevelopment of older public housing development into revitalized communities for current and future residents; approximately \$3M will fund human capital efforts within the four identified communities. In addition to the capital and human capital expenditures, the New Communities Initiative will invest nearly \$50M in Housing Production Trust Fund bond proceeds in 'replacement housing' mixed-income projects that serve the redevelopment of the four identified New Communities neighborhoods. In addition, \$6.793M will be received in NIF funding for eligible projects in FY2011. The Neighborhood Investment Fund is an annual, non-lapsing fund to finance economic development and neighborhood revitalization in 12 targeted areas of the District.

Managing the Process

Lead Agency

The District of Columbia Department of Housing and Community Development (DHCD) is the lead agency for overseeing the development of the District's FY2011 Action Plan. DHCD will also administer the majority of program covered by this plan. Other major public and private agencies responsible for administering programs covered by the plan include the District Department of Health's HIV/AIDS, Hepatitis, STD, and TB Administration (HOPWA funded activities); the District of Columbia Housing Authority (public housing facilities and services); the Department of Human Services in partnership with the Community Partnership for the Prevention of Homelessness (ESG / S+C funded programs and other homeless facilities and services); the District Department of the Environment (lead-based paint assessments).

DHCD will continue to work closely with its five contracted housing services-focused Community-Based Organizations (Housing Counseling Services, Latino Economic Development Corporation, Lydia's House, University Legal Services, and the Central American Resource Center); non-profit developers (such as Manna Community Development Organization, Mi Casa, and Community Preservation and Development Corporation), as well as other community partners including Anacostia Economic Development Corporation; Development Corporation of Columbia Heights, and Jubilee Enterprise of Greater Washington.

Plan Development Process

In preparing its FY2011 Action Plan, DHCD broadly consulted with government agencies, non-profit developers, community stakeholders, and residents working in housing, social, fair housing, and homeless services; lead-based paint programs; metropolitan-wide planning; HOPWA activities; and providing public housing. A variety of methods was used to collect input from the community, including a 'Housing and Community Development' survey, several stakeholder meetings, public hearings, and focused meetings with specific housing, health, and social service providers.

DHCD held five Community Need Hearings in which residents, stakeholders, and activist were invited to provide input on the FY2011 Action Plan. Overall, there was broad participation by each sector of the community.

Interagency Coordination

In addition to specific outreach regarding the Consolidated Plan, DHCD is fortunate to have considerable access to District agencies with complementary missions. The Government of the District of Columbia is organized into clusters of agencies with allied missions. The City Administrator and the Deputy Mayors use periodic coordination meeting to align resources and activities to match mayoral administration priorities. Additionally, monthly Mayor's Cabinet Meetings are used to further coordinate among the clusters of agencies. This system provides for continuous consultation and coordination between agencies.

As described earlier, DHCD is part of the Planning and Economic Development (DMPED) cluster, and the Health and Human Services cluster. The Planning and Economic Development cluster is led by a Deputy Mayor and consists of the Departments of Housing and Community Development; Planning; Small and Local Business Development; Real Estate Services; Consumer and Regulatory Affairs; Employment Services; Insurance, Securities and Banking; as well as the Office of Motion Picture and TV Development, the Taxicab Commission and the DC Commission on the Arts & Humanities. The Health and Human Services cluster is led by the City Administrator and consists of the Department of Health, Department of Human Services, Child and Family Service Agency, and others. In these periodic cluster meetings, agency needs, upcoming plans, and recent accomplishments are discussed to coordinate efforts. DHCD used these cluster meetings to assist in creating its annual action plan.

DHCD also participates in regular Housing Agency cluster meetings. These meetings are led by the DMPED and attended by DHCD, DCHFA and DCHA. The agenda regularly includes coordination of pipeline projects and resources, addressing shared issues and information sharing.

Citizen Participation

DHCD has a thorough and extensive community process that will be employed for all projects. DHCD consistently seeks to include the input of District residents in all phases and aspects of its Annual Action Plan, from the initial planning, to project and program implementation to the reporting and assessment of accomplishments. The effectiveness of this process is key in delivering the proper services and programs to the District's residents, while ensuring that the overall direction of DHCD's work is consistent with residents' expectations and is responsive to neighborhood concerns. A more detailed assessment of this processes elements is as follows:

1. Participation Process

DHCD encourages citizen participation in all stages of the planning process. From the drafting of the Consolidated Plan to the filing of the annual Performance Evaluation Report, DHCD hosts Public Meetings, provides draft copies of the Plan before submission, accepts and incorporates citizen input and feedback, and holds special hearings whenever any substantial amendments are made.

DHCD also works in an on-going capacity with key non-profit organizations in encouraging the participation of the citizens they work with directly, including many of the low and moderate-income residents who are the primary targets of its HUD funded programs. Bi-lingual services are available for those who request them.

Additionally, DHCD works very closely with District's well-organized neighborhood groups in matters that have a particular interest and/or impact on a particular area or neighborhood. This relationship ensures maximum availability of DHCD staff to the residents and ensures transparency of DHCD policies and initiatives.

2. Public Meetings

The core of DHCD's Citizen Participation Plan is the Public Meeting. DHCD hosts a Public Meeting during each phase of the funding cycle, one in preparation for the Consolidated Plan and its annual update through the One-Year Action Plan, and one in conjunction with DHCD's preparation of the Consolidated Annual Performance Evaluation Report. These meetings give the residents an opportunity to comment on all aspects of DHCD's administration of federal dollars, as well as all substantial activities undertaken by the District. A Public Meeting is also held when any substantial amendments are made to the Consolidated Plan.

Meetings are well publicized and are held at centrally located facilities that are safe and fully accessible. The locations are also accessible by public transportation and are held on convenient days and times.

3. Access to Information

DHCD has all Consolidated Plan, Annual Action Plan and Consolidated Annual Reports available on its website in a manner convenient for on-line viewing, downloading and printing. Draft versions of all Plans are made available before they are submitted for citizens, public agencies and other interested parties to view and comment upon. Copies of final and draft Reports are available free of charge at DHCD's office.

Additionally, information that applies to these reports and the District's work in general is available. Requests for access to specific information must be made in advance and coordinated with DHCD personnel.

DHCD's staff is also available to persons or interested parties who require technical assistance in understanding the Plan, in the preparation of comments, and in the preparation for requests of funding. This availability and responsiveness is also employed in handling and responding to whatever reasonable complaints are made concerning the Plan and its undertakings.

4. Substantial Amendments

Should any substantial change to the stated Objectives of the Consolidated Plan become apparent, DHCD will involve the residents through its above described methods and practices. Such substantial changes would be understood as being new activities DHCD would undertake within a reporting cycle and does not include expected and actual changes to Goals as they relate to external factors and unexpected changes in available resources.

5. Citizen Comments

Citizens were given an opportunity to provide comments or views on the FY2011 Action Plan. Citizen comments on this draft will be compiled and added to the many comments already received on needs and priorities for housing and community development in the District. DHCD foresees accepting and responding to all citizen comments. A full list of comments and responses will be made available in subsequent drafts. A summary of comments can be found in Appendix G.

Efforts to Broaden Public Participation

DHCD facilitates broad-based participation in its planning process by providing:

- No less than two-week advance publication of a Notice of Public Hearings,
- No less than 30 days to review the draft documents,
- Two-week periods following hearings for the submission of additional comments,
- Direct mailings of Notices to a wide range of interested groups,
- Easy access to draft documents (hard copies and on-line) and hearing transcripts,
- Accommodation of special needs participation through sign-language interpreters and interpreters for Spanish-speaking constituents, and
- Holding hearings at convenient times and in barrier-free facilities that are easily accessible by public transportation.

The Director and senior DHCD staff members are present at public hearings to take the direct testimony, answer questions on the District's housing and community development needs, and receive comments on DHCD's program performance for prior periods as well as for the current year. The submission of written testimony for the record is encouraged, and Public Hearing records are kept open for at least 2 weeks after the hearing for the receipt of post-hearing written testimony. A court reporter provides written transcripts within 2 weeks of the date of the Public Hearing, and a record of the Public Hearing, including the written transcript, is made available for public viewing at DHCD. When preparing the final Consolidated Plan, DHCD will include a summary of the comments and views received from citizens orally and in writing at the Public Hearing, as well as a response to any comments not accepted.

Moreover, DHCD will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the FY2011 Action Plan and its use of assistance under the programs covered under the Consolidated Plan during the preceding five years. Requests may be made to the DHCD Public Information Specialist at (202) 442-7200.

Institutional Structure

In the District of Columbia, executive functions are organized under the Mayor, City Administrator and two Deputy Mayors who supervise clusters of agencies with like missions. The Deputy Mayors use weekly coordination meetings to align resources and activities to match administration priorities. Bi-weekly Cabinet Meetings with the Mayor are then used to coordinate between and among the clusters of agencies. DHCD reports to the Deputy Mayor for Planning and Economic Development along with the following agencies: the Office of Planning (OP), the Department of Consumer and Regulatory Affairs (DCRA), the Department of Employment Services (DOES), the Department of Small and Local Business Development (DSLBD), the Department of Insurance, Securities, and Banking (DISB), the Office of the Tenant Advocate (OTA), and the Office of Cable Television.

DHCD also works closely with the DC Housing Authority (DCHA) and the DC Housing Finance Agency (DCHFA) to maximize dollars available for housing opportunities for all income levels from extremely low to moderate income. A representative of DHCD attends the meetings of the Metropolitan Washington Council of Governments (COG) Committee of Housing Directors to participate in information sharing and initiatives of the Committee. The Director is also a member of the Comprehensive Housing Policy Task Force, which brings together diverse interest groups and experts to broadly analyze housing needs in the District of Columbia and recommend actions.

As part of its unified leveraging strategy, the District will continue to work with its non-profit, for-profit and semi-governmental development partners, and to coordinate DHCD's investments in the renewal of

affordable housing and community facilities with government agencies that fund infrastructure improvements and services needed to create self-sustaining neighborhoods.

Monitoring

Program and financial management staff conduct formal on site monitoring at least once every two years of CDBG and HOME funded projects implemented by sub-recipients (more frequently if the sub-recipient is new or is having difficulty meeting program or contract requirements). Review of monthly or quarterly reports, program evaluation forms, program visits and phone calls are also part of program monitoring procedures. Program participants are surveyed periodically to determine level of satisfaction with services and areas in need of improvement. Program monitoring ensures that the sub-recipient's performance is adequate and in compliance with Federal and local regulations, as determined by the contract agreement and scope of service.

Components of project monitoring include compliance with eligible activities and National Objectives, HUD program rules and administrative requirements; accessibility to all sites where federally-assisted programs are implemented; progress against production goals; needs for technical assistance; composition and activity of a sub-recipient's board; statements of non-conflict of interest by board members; compliance with equal employment opportunities and labor practices; reviewing client files where appropriate; reviewing program brochures and printed material to ensure compliance with language accessibility; and evidence of innovative or outstanding performance.

Financial monitoring ensures that sub-recipients comply with all of the Federal regulations governing their financial operations. This includes reviewing original supporting documentation for financial transactions, time sheets, independent audit reports and management letters, tracking expenditures into the general ledgers, check books and bank transactions, internal controls, reviewing financial transactions to ensure that they are within the approved budget, and that expenditures are eligible and reasonable. An overall monitoring schedule is established at the beginning of each program year, as well as an individual monitoring checklist for each activity.

Monitoring of a sub-recipient that results in significant findings will require a corrective action plan and repeated interim monitoring visits by DHCD staff. If corrective actions are not taken within a prescribed period or if the findings are egregious in nature, project reimbursement is immediately suspended until the deficiencies are corrected. Any financial malfeasance would be immediately reported to the CPD office of the Washington Field Office of the US Department of Housing and Urban Development as well as the HUD Inspector General.

Long term compliance with property management and disposition requirements are outlined in contracts with sub-recipients. DHCD interests in real property acquired with CDBG or HOME funds are required to be recorded as part of the deed.

Federally-assisted housing projects that have HOME or CDBG funds invested are monitored periodically. Some projects have a full code inspection by the Code Enforcement staff and Fire Marshal. An on-site compliance monitoring review examines all aspects regarding the leasing of an affordable unit. It begins with a review of the components of the affordable housing agreement with leasing and management staff to ensure that all parties understand the requirements. Additionally, the lease, the rental amounts and the rent roll, the tenant selection policy and process, the waiting list procedures, property marketing plan and fair housing notices are reviewed. Tenant files of households occupying affordable units are reviewed to ensure required procedures are followed, such as using HUD Handbook 4350.3 to identify and calculate income correctly, obtaining signatures of all adult household members on income certifications and renting at allowable amounts. Occupancy reports submitted by the owners are reviewed while on-site to verify that the information being reported is substantiated by the documentation in the file.

When discrepancies are noted, the owner is required to make corrections. Corrective action ranges from the owners making corrections on their report to providing a replacement affordable unit when the existing household is ineligible for the unit. Other changes might be preparing a more effective marketing plan or repayment of rent to tenants.

Lead-based Paint

DHCD is committed to producing affordable housing that is free from lead-based paint hazards in all of its development programs. Since 2002, DHCD has revised protocols for all single family and multi-family housing development programs to ensure that these programs comply with the Lead-Safe Housing Rule (24 CFR 35). DHCD requires that lead-based paint (LBP) hazards be addressed in every project it undertakes involving an existing residential building. DHCD's multi-family and single family housing project development operations finance more than 2,000 units of rehabilitated housing each year, and DHCD's commitment to lead safety requires that all of those housing units be rendered lead-safe by the completion of the construction phase of development.

Implementing DHCD's adaptation of the Lead-Safe Housing Rule involves approving and/or monitoring the full range of lead-hazard reduction activities, e.g., disclosure verification, risk assessment completion, lead scope-of-work development, finance for the lead-based paint reduction work, construction inspection, and verification of clearance. Once clearing testing is complete, the District's Department of the Environment (DDOE) reviews the particular project and issues Letter of Permit Completion to the property owner.

In addition to what are now routine requirements for lead safety in all DHCD housing rehabilitation activities, DHCD is also administering a Lead Hazard Reduction Demonstration Grant, awarded in 2009 on a competitive basis from HUD's Office of Healthy Homes and Lead Hazard Control. In May 15, 2009 DHCD was awarded \$2.6 million in lead grant funding under American Recovery and Re-investment (ARRA) for Lead-Based Paint Hazard Reduction and Demonstration. As of this writing, 31 units have been cleared as lead safe, with an additional 25 units currently in the pipeline to be cleared as lead safe. In addition, 130 Multi/Single family units have been committed for lead risk assessment inspection. DHCD is required to complete 170 units under the grant.

This grant will reduce lead-based paint hazards in housing built before 1978 that is occupied by or available for occupancy by low-income (< 80% Area Median Income) households with children under the age of 6 years. The products and services to be delivered in grant include:

- Lead-based paint hazard risk assessment in 250 housing units;
- Lead-based paint hazard control in 170 housing units;
- Community education on lead safety;
- Training in lead-safe work practices for District residents in the home repair and lead-based paint hazard abatement trades; and
- The hosting of an annual conference that brings together health organizations, lead-based paint abatement contractors, government agencies, and other entities involved in lead safety and children's health.

Previously, in March 2008, DHCD completed production requirements under its grant (Lead 2) for Lead Hazard Reduction Demonstration (182 units cleared for lead safety more than HUD requirement of 175 units). And in March of 2009, DHCD also completed and made lead safe 260 units under its Lead Hazard Control grant (Lead1- HUD requirement was 225).

DHCD is working in partnership with the District's Environment (DDOE), and Consumer and Regulatory Affairs (DCRA), as well as with the enforcement activities of the Office of the attorney General, to provide a seamless system of (1) identification of lead hazards in residential property, (2) enforcement actions against property owners, where applicable, and (3) opportunities for property owners to finance lead hazard reduction activities. Since August 2006, the Mayor of the District of Columbia has ensured that there is a single coordinator for all District programs dealing with lead-based paint hazards. That coordination has been instrumental in facilitating the development of seamless actions across the District agencies noted above.

DHCD is committed to meeting all HUD goals for lead-safe housing and expanding the District's capability for lead-safe financing even beyond HUD-financed grant opportunities.

Additional Lead Intervention:

As an accompaniment to the District's efforts to reduce lead hazards, DHCD's Single Family Residential Rehabilitation Program has been financing the replacement of the privately-owned portion of residential lead water service lines. The D C Water and Sewer Authority (WASA) will replace all of the District's residential lead water service lines by 2013. DHCD continues to offer its financing to eligible low-income households as they are scheduled to have the public portion of their lines replaced by WASA.

As part of the District's five-year goal to protect public health and safety from environmental hazards, including lead-based paint hazards, it will address the issue through a four-pronged strategy that includes collaboration, assessment and testing, public education; and enforcement of public health laws.

Collaboration: Enhance communication between District agencies to ensure identification and reduction in lead-based paint hazards.

Assessment/ Testing: Improve ability to test for lead-based paint in units where there is a risk or probable cause, such as a child with elevated blood levels. Continue testing children in all DHS public health clinics.

Public Education: Take steps to inform the public of the dangers of lead-based paint, methods for identifying it and behavior strategies for reducing contact (especially children) with lead dust and chips.

Enforcement/Correction: Inspect units and notify owners of the need to take corrective action regarding covering or abatement of lead-based paint in a dwelling unit. Refer to resources for correction and/or enforcement.

Chapter Two: Housing

Specific Housing Objectives

In FY2011, DHCD will focus on three specific objectives:

- 1) Preserving and increasing the supply of quality affordable housing,
- 2) Increasing homeownership opportunities, and
- 3) Revitalizing neighborhoods, promoting community development, and providing economic opportunities

Each division's initiatives work either towards one, two or all three objectives. Furthermore, each division has a set of measureable key performance indicators that include outcomes, outputs and efficiencies to allow the Department to work toward a more sustainable community and better serve District residents. The following tables represent the internal reporting, including past performance, for each division.

Table 3: FY2011 Summary of Specific Housing Objectives

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Outcome/ Objective*
1	Housing Regulation Administration				
1.1	Preserving and increasing the supply of quality affordable housing	HPTF, Local, Other	# of customers who utilize the HRC - Total # of inclusionary zoning units built	650 TBD	DH-1 DH-2
2	Development Finance Division				
2.1	Preserving and increasing the supply of quality affordable housing	CDBG, HOME, Stimulus, Other	- Total special needs housing units funded - Total affordable housing units preserved - Total # of affordable units funded % of renters spending greater than 30% on housing cost	150 200 900 45	DH-1 DH-2
2.2	Increasing homeownership opportunities	CDBG, HOME, Stimulus, Other	- Total new homeownership units funded - Total First Right Purchase units funded % of Owners spending greater than 30% on housing cost	80 100 35	DH-1 DH-2
3	Residential and Community Services				
3.1	Preserving and increasing the supply of quality affordable housing	CDBG, HOME, Stimulus, HPTF, Other	- Total affordable units funded by RCS - Total single family rehab - Total lead multi-family units	200 75 65	SL-1 SL-3

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Outcome/Objective*
			funded	15	
			• Total residential rehab special needs units funded • # of Elevated blood lead level cases	40	
3 2	Increasing homeownership opportunities	CDBG, HOME, Local, Other	• # of employee homebuyers funded by EAHP • # of qualified employee homebuyers funded by NEAHP • Total # of first time homebuyers funded by HPAP • Total HPAP special needs units funded	80	
				100	
				400	
				10	DH-3 EO-1
4	Property Acquisition and Disposition				
4 1	Preserving and increasing the supply of quality affordable housing	Capital, Other	• Total # of affordable units created or rehab through reclamation of abandoned properties • Average # of years of affordability for units created or rehab through reclamation of abandoned properties	45	
				15	SL-2

Needs of Public Housing

Public housing is funded by HUD and refers to housing subsidized by the federal government with the intent of providing safe, decent, and affordable housing for low and moderate-income persons. Services are delivered in two main fashions:

1. through public housing properties, and
2. through Section 8 housing vouchers whereby residents are allowed to find and select their own housing, either apartment-style or single-family residences, then pay a portion of the required rent based on their ability to pay.

The DC Housing Authority (DCHA) administers the Low-Rent Housing and Housing Choice Voucher Programs (formally Section 8), which are instrumental in preventing homelessness among extremely low-income families. At the present time, the DCHA provides an estimated 8,000 public housing units through its Low-Rent Housing Program. An estimated 3,000 Housing Choice vouchers are also being utilized in scattered-site housing within the city limits. Housing specifically geared for special needs populations such as the elderly or people with disabilities are also included in these figures.

Each of the DCHA's public housing developments has a resident management council through which residents can become involved in the decision-making that affects their public housing units. The DCHA facilitates the selection of the councils and encourages residents to participate in council activities and in the general management of their development. The DCHA will continue to promote involvement by the council in management of all facilities and will look at forming new partnerships with community agencies to provide services that encourage and assist residents with achieving self-sufficiency.

There has been an increasingly proactive effort to enable residents of the Housing Authority to break the cycle of poverty and move towards greater self-sufficiency. The role of the Housing Authority continues to evolve into one that addresses the needs of public housing residents in a holistic manner, taking into account their educational, employment, health, and social service needs. The Housing Authority either develops its own programs or coordinates services with other providers to meet these needs. The Housing Authority has moved forward and is flourishing with several full-time Housing Counselors. The Housing Counselors are responsible for the development and implementation of Homeownership programs for their residents. The hiring of these Housing counselors has been a smashing success. As of the date of hire, hundreds of families have become homeowners. In many cases, these essential services are already available in the community, and the role of the Housing Authority is to serve as the facilitator and coordinate the delivery of these services to the public housing property to make them more accessible for residents.

The Housing Choice Voucher Administrator provides homeowner opportunities to families who are currently utilizing the Housing Choice Voucher Program. In place of using the voucher as rent, the voucher is put toward the house payment. Of the 3,000 Housing Choice vouchers received 120 are being utilized by homeowners to make their monthly house payments.

The DHCD continues to encourage the Housing Authority director to refer potential homebuyers presently residing in low rent housing to seek out the services of these different organizations. The main problem facing the DCHA continues to be the ever increasing demand for housing services with little or no increase in federal aid to support this demand. This reality is clearly represented in the growing number of individuals and families on the waiting lists maintained by the DCHA. According to the Mayor's recent consultations with DCHAs, there are approximately 29,000 individuals on local waiting lists in the District. This number was increasing but applications for Housing were closed in September 2009 and are not expected to open soon. This number illustrates that the current demand for housing assistance far exceeds the ability of the DC Housing Authority to meet this growing demand. Recent projections indicate that this gap will surely widen into the foreseeable future as the city's population growth outpaces the ability of government social service programs to respond to this growth.

The District is pleased to report that the DC Housing Authority is not designated as 'troubled' by HUD. In recent years, the DC Housing Authority continues to receive High Performer Awards for their endeavors. The DHCD continues to examine opportunities for leveraging its housing and community development funds with the DCHA to provide other public services and to expand homeownership opportunities.

Barriers to Affordable Housing

In the past decade, the District of Columbia housing market has experienced a sharp increase in housing prices making the District one of the least affordable in terms of housing. While home prices have declined since mid-2009, the rents and home prices remain far higher than a decade ago. Affordable rental units continue to be converted into luxury condominiums, although not at the same rate as the peak of the housing market. The lack of affordable housing has been particularly burdensome for low- and moderate- income residents, and is so severe for the District's lowest-income residents that most in this category now spend half or more of their income on housing.

The reasons for the high cost and limited stock of housing are complex, but government officials and policy experts have identified the following policies or lack of policies as major obstacles to affordable housing in the District.

- A lack of tax incentives in the D.C. Official Code to promote the development of affordable housing and homeownership opportunities;

- A rent control system which allows landlords to increase rents without many rules and regulations
- High rates of rental to condo conversion displacing low-income residents,
- The Uniform Height Act of 1910, which effectively limits building height in the District to 13 stories and requires a Act of Congress to repeal,

In FY2011, the District will take several steps to remove any barriers to affordable housing and ameliorate the impacts of the current housing market, but realizes that future resources will buy less in this competitive atmosphere. In order to achieve the vision of complete neighborhoods DHCD has taken 11 steps to address the need for affordable housing in the District

1. Housing Production Trust Fund

A DHCD-administered source of public funds focused on producing and preserving units of affordable housing for low- and moderate-income residents. The Trust Fund is targeted to serve residents with the greatest housing needs. At least 40 percent of all funds must be used to serve households with incomes below 30 percent of the area median income (AMI). At least 40 percent of funds must be used to serve households with incomes between 30 percent and 50 percent of AMI. The remaining 20 percent of funds may be used to serve families with incomes up to 80 percent of AMI. In addition, at least half of all Trust Fund funds must be used to produce or preserve rental housing.

2. Rental Housing Conversion and Sale Amendment Act of 2005

This act gives tenant associations in the District the right to purchase their housing units upon sale by the owner. DHCD now administers this program, which effectively aligns the purpose of the law with the Department charged with creating and preserving affordable housing opportunities. DHCD offers tenant purchase financing which assists in the preservation of affordable units across the city as a whole.

3. The Housing Regulation Administration (HRA)

HRA administers the District's rental housing regulations and implements the District's Inclusionary Zoning program. Inclusionary Zoning in the District requires an exclusive percentage of units in a new development or a substantial rehabilitation that increase the size of an existing building set aside affordable units in exchange for a bonus density. The goals of the program are to generate mixed-income neighborhoods, construct affordable housing for a diverse labor force; seek equitable growth of new residents, and augment homeownership opportunities for low and moderate income levels. HRA is able to provide faster response to apartment building conversion concerns which can affect low income tenants since the notification process is flexible within the agency and displacement can be avoided.

4. Residential and Community Services Division (RCSD)

RCSD administers the District's Home Purchase Assistance Program and Employee Assisted Housing Programs which provide financial assistance for low and moderate-income households and District Government employees for the purpose of first-time home purchase. The Division also provides rehabilitation resources, including grants for lead hazard remediation to eligible units and loans and grants to income-qualified owner-occupant District residencies in order to preserve homeownership in the District. RCSD also oversees the Single Family Residential Rehabilitation Program, which provides loans to help households finance home repairs that will address District housing code violations. Funding may be used to repair walls and floors, to replace windows, and to repair plumbing, electrical, and heating systems.

5. Community-Based Organization Partners

DHCD partners with non-profit and private sector housing advocates and practitioners to affirmatively further fair housing and provide greater education coverage of housing and fair housing issues to target communities. This is accomplished by funding community-based organizations to provide outreach and education to District residents who are tenants and homeowners on topics such as purchase programs for first

time homeowners, comprehensive homeownership and housing counseling, foreclosure prevention and assistance for relocation, and location of apartments

6. Targeted Spending of Scarce Resources

DHCD has partnered with community-based, private sector and nonprofit partners such as Fannie Mae and the Urban Institute to ensure effective analysis and targeting of scarce resources to maximize outreach and education to empower residents about their choices.

7. Recovery Act Grants

DHCD will distribute the funding toward single-family and multi-family redevelopment and preservation through the acquisition and sale of vacant and foreclosed properties; rehabilitation and homeownership opportunities through a “turnkey” program which will involve partnerships with the D C Housing Authority, and down payment assistance to low and moderate income homebuyers

8. Tax Abatement for lower income homeownership

Eligible homeowners, including non-profit organizations and shared equity investors, may receive a five-year tax abatement and be exempt from paying recordation and transfer taxes. To qualify, they must meet the following conditions

- The property must be owner-occupied,
- The owner must meet the income level requirement; and
- The property must be less than \$320,000 in value

9. Rental Control Reform Act of 2005

This act has placed a cap on how much rents can increase due to tenants complaining of unexplained rent increases and pricing them out of their apartments.

10. Housing Waitlist Elimination Act of 2008

This act requires the Mayor to submit a comprehensive plan that outlines a strategy for eliminating the District of Columbia Housing Authority’s current waiting list of individuals seeking housing choice vouchers and placement in public housing by January 1, 2012, and measures to prevent the waiting list from reaching such high levels in the future

11. DCHousingSearch.org

DCHousingSearch.org allows residents to quickly find housing that fits their needs and budget by providing up-to-date listings of available for rent and for sale properties. The site also connects people to housing resources through website links and provides helpful tools for renters such as an affordability calculator, rental checklist, and information about renter rights

HOME

Forms of Investment DHCD may invest HOME funds in all proposed uses as prescribed in 24 CFR 92.205(b). The District’s FY2010 HOME funds will be invested consistent with the purposes of this part and in accordance with HUD

Recapture and Resale

DHCD has selected to use the recapture and resale methods depending on the program.

Recapture:

Single-Family Homeownership Provisions When DHCD uses HOME funds for its homeownership programs, including both the Home Purchase Assistance Program (HPAP) and the Single Family Residential Rehabilitation Program, it will utilize the recapture provision of the program, pursuant to 24 CFR

92 254(a)(5)(i)(A)(1) The full amount of assistance is recaptured upon transfer of the property or upon the homebuyer's no longer using the property as a principal residence. This requirement is established as a covenant in the loan documents executed at settlement of the property. The resale provision would not be appropriate for the Department's single-family homeownership assistance program since it would impose an undue restriction on homes purchased in the private sector real estate market.

Resale.

Developer Assisted Homebuyer Provisions DHCD, through its Development Finance Division, uses HOME funds to assist *developers* in new construction, renovation and rehabilitation activities that will result in the creation of affordable single-family and multi-family (condominium) ownership units and multi-family rental units in the District of Columbia.

With regard to the ownership units, DHCD utilizes the RESALE provisions of the HOME Program pursuant to 24 CFR 92 254 (a)(5)(i)(A) by incorporating restrictive covenants running with the land and a silent second Deed of Trust that will require homebuyers to 1) Maintain the HOME-assisted unit as his/her principal place of residency during the Affordability Period, and 2) Sell the HOME-assisted unit to a subsequent HOME income-eligible buyer, if said sale occurs within the unit's Affordability Period.

The resale requirement must also ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The subsequent HOME income-eligible buyer will also have to maintain the unit as his/her principal place of residency throughout the remaining Affordability Period. If additional HOME funds are invested in the property at resale, the Affordability Period begins anew or has been effectively extended. Therefore, if the subsequent HOME income-eligible buyer also receives HOME funding, then the Affordability Period on the unit will be the total of the balance of the previous homebuyer's Affordability Period *plus* the Affordability Period as determined by the second HOME investment amount.

Refinancing DHCD does not use HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

Definition of Modest Housing DHCD defines 'modest housing' by following the method outlined in 24 CFR 92 254(a) (iii) for its homebuyer assistance and single family rehabilitation programs. Specifically, DHCD caps the allowable sales price or post-rehabilitation value at the Single Family Mortgage Limit under the Section 203(b) program, as permitted by 24 CFR 92 254 (a)(2)(iii). The limits for the District of Columbia as of February 25, 2009 are as follows:

House Size	1 family	2-family	3-family	4-family
203(b) Limit	\$729,750	\$934,200	\$1,129,250	\$1,403,400

These limits apply to one-to-four family units. DHCD does not presently finance manufactured housing. In addition, DHCD applies the one-family limit to the sales price or post-rehabilitation value to define modest housing in the case of condominium or co-operative units. In doing so, DHCD cites the following:

94 254(a)(2)(iii) If a participating jurisdiction intends to use HOME funds for homebuyer assistance or for rehabilitation of owner-occupied single-family properties, the participating jurisdiction may use the Single Family Mortgage Limits under Section 203(b) of the National Housing Act (12 U S C 1709(b), which may be obtained from the HUD Field Office) or it may determine 95 percent of the median area purchase price for single family housing in the jurisdiction as follows

DHCD uses the 203(b) limit rather than the 95 percent of the median area purchase price standard.

Affirmative Marketing DHCD follows HUD's regulations as prescribed in the Affirmative Fair Housing Marketing Plan form (AFHMP) [HUD 935-2] DHCD has produced an AFHMP Form in compliance with federal guidelines and it ensures the District's demographics are represented as categories for affirmative marketing. DHCD has also instituted a certification process to ensure that program services, facilities which provide services to the general public and housing rehabilitation projects also abide by the affirmative marketing principle, as such it has produced an 'Affirmative Marketing Plan' form for those types of projects. Through accurate document retention and monitoring, DHCD ensures that its recipients complete and submit the AFHMP with appropriate accompanying information on residential housing projects of five units or more, whether these are located in one parcel or a scattered multi-family project DHCD aims to ensure that prospective buyers or tenants in the housing market area, regardless of their Fair Housing Act or Human Rights Act protected category, know about the housing development(s) financed through DHCD, are attracted to the housing project, feel welcome to apply, and have an equal opportunity to buy or rent The AFHMP aims to (1) bring greater diversity to areas that have been subjected to housing discrimination based on the residents' race or color, ethnic background and culture, their perceived or actual disability, the presence of children in the household, their religious practices, or for being one gender versus the other, and (2) inform about the availability of housing to persons not likely to apply for the housing without special outreach efforts due to (a) self or forced segregation, (b) linguistic isolation, (c) neighborhood racial or ethnic composition and patterns, (d) location, and (e) price of housing

Outreach to Minority- and Women-Owned Businesses The District Government as a whole has an active program of contracting with and promoting Local, Small, and Disadvantaged Business Enterprises (LSDBEs), which include minority- and women-owned businesses The District's Department of Small and Local Business Development (DSLBD) monitors the efficiency and compliance of all District government agencies, including DHCD, in accordance with the legislative mandate of the "Equal Opportunity for Local, Small, and Disadvantaged Business Enterprises (LSDBE) Act of 1998 " DSLBD reviews and approves Affirmative Action Plans submitted by District agencies for public/private partnerships and for contractors with contracts in excess \$25,000 It also provides technical assistance to LSDBEs that wish to contract, or currently contract, with the District government, and helps those entities with outreach

DHCD's loan and grant agreements with developers require that the developers submit Affirmative Action Plans that set forth goals for the hiring of local, small and disadvantaged business enterprises and for hiring minorities and women for construction and non-construction jobs

Increasing Minority Ownership DHCD's HOME funded direct homebuyer assistance is projected to assist an average of 30-35 minority households each year of the Five-Year Plan, or 150 -175 households over the period Using all funding sources, DHCD estimates providing homebuyer assistance to at least 200 minority households per year or more than 1,000 households over the period of the Five-Year Plan

Under the DFD HOME-funded developer projects, DHCD funds the *developers* of affordable ownership housing, and not individual homebuyers

Chapter Three: Homeless

Specific Homeless Prevention Elements

1. Sources of Funds

In FY2011, Emergency Shelter Grant (ESG) funds will pay for homeless prevention, emergency assistance, administrative costs and shelter operations. The ESG funds are used in conjunction with ARRA funds and locally appropriated funds to provide a robust array of prevention services. The Community Partnership for the Prevention of Homelessness administers ESG funds under the direction of and pursuant to a grant agreement from the Department of Human Services. Funds are distributed through a network of community-based organizations for which the Foundation for the National Capital region serves as fiduciary agent. ESG funds are used to leverage funding from Fannie Mae through the annual Help the Homeless Walkathon. ESG prevention funds are used to cover eligible rental assistance for past due rent and utility assistance for utility bills that are significantly overdue and which are often an early warning sign of risk of homelessness. Table 4 describes the uses of ESG 2010 (FY2011) funds.

Table 4: FY2011 Proposed Emergency Shelter Grant Budget

ESG Eligible Activity	
1 Homeless Prevention	240,870
2 Shelter Operations	521,885
3 Administrative Costs	34,004
TOTAL ESG Program	\$796,759

*Served includes person, households, and families

In FY2011, Shelter Plus Care Grant (S+C) funds will also be used to support the homeless citizens of the District of Columbia. DHS will serve as the grantee for the Shelter Plus Care program (S + C program) and the Community Partnership for the Prevention of Homelessness (TCP) will serve as the sponsoring organization. DHS will work with TCP staff to administer this program and provide permanent housing to 397 program participants. DHS will continue to monitor TCP for compliance in administering the S + C Program. S + C funding total is \$3,400,000.

2. Homelessness

The District of Columbia is committed to being a national model in its approach to homelessness by preventing homelessness whenever possible and addressing the needs of our homeless neighbors by creating an individualized approach that improves well-being while moving people out of homelessness as rapidly as possible. The District will develop strategies that will allow it to be successful in federal funding competitions and that incorporate HEARTH Act requirements. It will be critical to align all possible resources, including local, federal, and private funds to be successful in achieving the goals. The plan outlines the following three policy objectives:

- Reduce the overall number of homeless individuals and families
- Redesign the Continuum of Care to develop an appropriate mix of services and interim and permanent housing options
- Design an evaluation strategy and mechanism to track the District's progress in preventing and reducing homelessness

The Plan includes ten outcome measures that the District will track to evaluate the extent to which we have been successful in preventing homelessness as well as helping people move out of homelessness more

quickly through the implementation of this strategic plan. The plan includes an initial Work Plan which will be updated annually. Key elements of the plan can be found in the 5-year Consolidated Plan.

3. Chronic Homelessness

The District's 10 Year Plan addresses the issues of chronically homeless individuals. Outreach services provided by several non-profit organizations under the supervision of DHS will continue to engage homeless individuals who are living on the streets and have a diagnosis of serious mental illness, chronic substance abuse, or dual diagnosis. Engagement services include a bagged meal food program, a drop in center, and mobile mental and substance abuse services. The drop in center provides additional services that assist with the engagement process that include but are not limited to shower services, access to toiletries, laundry services, access to medical services, and mail and phone services.

The Mayor has made a commitment to provide comprehensive services to meet the needs of homeless individuals. These services include case management services that are housing focused in nature, mobile mental health and substance abuse services, and weekly interdisciplinary meeting. This focus on the chronically homeless has resulted in a significant decrease in the number of chronically homeless living in shelters or on the streets.

The District's ultimate goal of serving the chronically homeless is to place them in permanent housing. The 10 Year Plan does focus on the development of permanent supportive housing programs that include "housing first" models. Most of the programs include a combination of a rental subsidy combined with supportive services. The 10 Year planning goals include the continued development of housing stock and the need to expand local rental subsidies and apply for other federal and state funding sources that support the development of permanent housing solutions.

Specific steps to be taken during FY 2011 are described in the Consolidated Plan and the District's Permanent Supportive Housing Plan.

4. Homeless Prevention

In partnership with the District, the Community Partnership provides an array of homeless prevention services, including:

- Case management (limited and short-term assessments and education, and home visits),
- Child abuse assistance (crisis intervention and immediate safety),
- Emergency assistance (overnight vouchers, utility assistance, security and utility deposits, food and clothing distribution, meals, use of shower and restroom facilities, health-related transportation, and referrals);
- Family violence assistance (crisis intervention and immediate safety),
- Information and referral (Info Line),
- Life skills classes (counseling center); and
- Tenant counseling, fair housing, discrimination, and housing assistance.

The Community Partnership's DC HMIS system also helps agencies better communicate and coordinate resources to provide homeless persons and persons at imminent risk of homelessness with better access to the region's network of homeless services and resources.

In FY2011, the American Recovery and Reinvestment Act of 2009, DC will receive additional funding under the Homelessness Prevention and Rapid Re-housing Program. This program will provide financial

assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly re-housed and stabilized. The funds will provide for a variety of assistance, including short-term or medium-term rental assistance, assistance with utility payments, credit counseling and case management.

5. Discharge Coordination Policy

As part of the 10 Year Plan to End Homelessness, The District adopted a comprehensive Discharge Coordination Policy that comprised of policies and protocols for the discharge of persons from publicly funded institutions and systems of care, including foster care, health care, mental health, and corrections. The purpose is to prevent these individuals from becoming homeless and requiring homeless assistance. Key elements of this policy can be found in the 5-year Consolidated Plan. In FY2011, the District will continue to review and update this policy as needed.

Chapter Four: Community Development

Community Development

The District's core community development needs are those activities which help improve the quality of life of residents through neighborhood revitalization and employment, promote economic opportunities for residents and business owners, residential empowerment, and support the District's overarching objective in creating complete sustainable neighborhoods. With these conceptual goals in mind, the District anticipates using Community Development Block Grant (CDBG) funding to support programs to

1. Help ensure the District can include complete sustainable neighborhoods, especially for those who have limited resources available to them. CDBG and other funds will be used to support acquisition, disposition, construction, rehabilitation, and de-leading of housing and property. Additionally, funds will be used toward fair housing activities, rental housing subsidies, homeownership assistance, and energy efficiency improvements. Funds will be used toward physical improvement to encourage sustainable neighborhoods within the District.
2. Bring federal, nonprofit and private partners together to expand the District's tax base, attract and retain businesses of all sizes, strengthen the business climate, and bring good-paying jobs to residents, particularly those residents who are low to moderate incomes. Additionally, the District wants to lead the charge to create jobs for residents by growing and supporting businesses currently in the District and attracting new businesses. Lastly, the District will emphasize resident job training for those of low to moderate incomes in order for them to successfully obtain the new higher level jobs being brought into the District.
3. Create vibrant and stable neighborhoods, rebuild retail corridors and ensure every District investment yields real benefits for residents and local businesses. The District hopes these funds help preserve, enhance, and strengthen the physical character and quality of District neighborhoods. Priorities will be placed on projects that strengthen neighborhood identity, create more housing choices, guide growth, and improve environmental health. Finally, homeownership programs will be supported to help improve community stability by increasing homeownership rates in the District.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City and neighborhood. Public service activities that strengthen neighborhood organizations, provide employment, skills, and homebuyer training, and offer leadership opportunities to youth will be emphasized.

Community Development Objectives

Table 5 shows the specific community development objectives of the CDBG program. These objectives are funded specifically with CDBG resources, in congruence with other allocated resources, in order to create complete neighborhoods and a more sustainable city. DHCD's community development primary objective is focused on implementing a community development plan that enhances the sustainability of the District within the regional context and holistically completes the fabric of the neighborhoods.

Table 5: FY2011 Specific Community Development Objectives

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Outcome/ Objective*
2	Development Finance Division				
2.3	Revitalizing neighborhoods, promoting community	CDBG, HOME,	• % of affordable housing developments that are highly	100	SL-3

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Outcome/ Objective*
	development, and providing economic opportunities	Stimulus, Other	sustainable and meet the Green Communities Criteria		
3	Residential and Community Services				
3 3	Revitalizing neighborhoods, promoting community development, and providing economic opportunities	CDBG, Stimulus	- Total # of storefront facades improved - Total # of technical assistance provided to small businesses	40 750	EO-3
4	Property Acquisition and Disposition				
4 3	Revitalizing neighborhoods, promoting community development, and providing economic opportunities	Capital, Other	- Total # of properties acquired - Total # of properties recaptured - Total # of properties for which disposition agreements were executed - Total # of properties investigated that result in rehab	25 10 55 10	SL-3

Priority Community Development Projects

DHCD's community development primary objective is focused on implementing a community development plan that enhances the sustainability of the District within the regional context and holistically completes the fabric of the neighborhoods. Priority community development projects throughout the FY2011 Action Plan includes

a. Housing Resource Center

To build a more inclusive neighborhood and increase the number of District Residents who utilize DHCD services, DHCD opened a Housing Resource Center in 2009. This center serves the community as a one-stop shop for housing services and referrals, including providing access to DHCD's searchable affordable housing database, dchousingsearch.org. Community access to the facility's services will continue throughout the five year plan.

b. Interagency Coordination

Through a recent partnership with the Department of Mental Health (DMH), DHCD is responsible for meeting a goal of financing the development of 300 affordable housing units for the exclusive use of DMH consumers. Through an additional partnership with the Department of Human Services (DHS), DHCD is responsible for meeting its goal of providing 45 units of permanent supportive housing to serve the District's homeless population.

c. Housing Cooperatives

Access to homeownership opportunities has become more difficult due to the national economic downturn. DHCD will leverage investments already made into housing cooperatives, by coordinating with financial institutions in order to structure housing cooperative pools. These pools will enable tenant association members that have already purchased their buildings within a cooperative structure to reduce their cost of housing preservation, obtain new rehabilitated housing units and preserve their ability to reside within the District.

d. Foreclosure Technical Assistance

DHCD will provide technical assistance to borrowers who face financial difficulty or are nearing foreclosure due to current market conditions and require DHCD loan restructuring in order to preserve the affordable housing units.

e. Community Facilities

Neighborhoods across the District rely on the development of community facilities for services such as childcare, healthcare, food provisions, job training, etc. Such facilities can be difficult to develop in the current economic climate, since many private lenders will not make loans for such projects, since loan repayment can be uncertain. As a result, DHCD will coordinate with local financial institutions that have been awarded New Market Tax Credit allocations, so that a modest investment from DHCD can catalyze a larger investment from equity providers – all with the goal of financing the development of much needed community facilities in specific District neighborhoods.

f. Housing Assistance

DHCD will continue to develop housing assistance programs throughout the five year plan. Recently, in an effort to assist and encourage employees to live and work in the District of Columbia, DHCD added a non-traditional affordable housing assistance incentive program, the Negotiated Employee Housing Assistance Program (NEAHP), to its two existing programs, HPAP and EAHP. It is a long-term goal of DHCD to partner with other District agencies to establish homeownership for employees to live near their place of work in the District.

g. Small Business Assistance

It is the goal of DHCD to improve small business development in the District. Through community-based, non-profit organizations, project goals will help to support and strengthen existing businesses, broaden the commercial mix of stores, restaurants, and services, provide technical assistance to small businesses, and provide greater access to capital for small, neighborhood-based businesses.

h. Commercial Improvements

DHCD will continue its efforts to provide grants, through community-based non-profit partners, to retail and commercial property owners for the enhancement of retail and commercial facades in targeted commercial corridors of the District.

Anti-Poverty Strategy

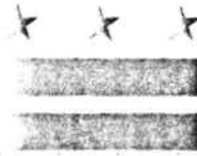
DHCD, along with other agencies, has played a major role in the District's direct efforts to reduce poverty, and the HUD entitlement program funds administered by DHCD is one of many sources of funds for anti-poverty activity by the District. By funding housing for extremely low, very-low and low-income residents, DHCD contributes to the City's anti-poverty strategy by lifting families out of poverty and providing them with stable lodging and a means to build equity for the future. DHCD also supports other DC Government initiatives in reducing poverty and utilizes its federal and local funds to help residents improve their financial stability through housing and financial counseling programs conducted by a network of non-profits. DHCD also provides funds to Community Based Organizations (CBO) to assist small businesses with technical assistance and to improve their physical appearance.

Other agencies play the key roles in the reduction of poverty. The Department of Human Services administers income support, welfare to work and a range of programs to support families and individuals. The Community Partnership for the Prevention of Homelessness provides emergency support from ESG funds to prevent eviction. The Office on Aging provides support services to seniors and partners with DHCD in the development of senior housing.

The Department of Employment Services (DOES) provides extensive job training opportunities through its city-wide “One Stop Service Centers.” The Workforce Investment Council (WIC) brings together private and public sector stakeholders to develop strategies to increase employment opportunities for DC residents and to support and to assist DOES in its employment mission. The DC Public School Administration has created career-oriented high schools in a number of specialized areas, including the Technology and Hospitality Industries to facilitate students progressing from school to real jobs in the DC market.

In FY2011, DHCD will continue to play an important role in the District’s new set of anti-poverty initiatives that directly target neighborhoods with high poverty and crime rates. The New Communities Initiative and the Great Streets Initiative have been planned to address both physical and socio-economic-educational needs of the targeted areas—by combining government resources with those of private and non-profit developers or organizations to bring long-term and comprehensive revitalization to the designated area. “New Communities” is a comprehensive partnership to improve the quality of life for families and individuals living in distressed neighborhoods. The companion program, “Great Streets” is a strategy to revive the local commercial corridors bordering the new communities so that the balance of services that neighborhoods need are restored along with the housing and social fabric.

These two initiatives are an aggressive approach to fighting poverty that includes current residents and businesses in the planning for an inclusive neighborhood that attracts a mixture of incomes and families, singles, and elders into the revitalized neighborhoods.



**APPENDIX B: HOPWA 5-YEAR CONSOLIDATED PLAN,
FY 2011-2015 AND HOPWA FY 2011 ACTION PLAN**



Chapter Five: Non-Homeless Special Needs

Non-Homeless Special Needs Priorities and Objectives

As indicated in the FY2011 – 2015 Consolidated Plan, there are several populations who require more focused attention beyond their emergency shelter needs. These populations have “special needs” and they oftentimes fall into multiple special needs categories. These include the following:

- Elderly and frail elderly,
- People with severe mental illnesses,
- People with disabilities (mental, physical, and developmental),
- People with alcohol or other drug addictions,
- People with HIV/AIDS or other related diseases,
- Youth and,
- Victims of domestic violence

The following special needs populations have been identified as the District’s highest priorities for non-homeless special needs housing and supportive service assistance for the FY2011 Action Plan:

- Elderly and frail elderly,
- People with disabilities (mental, physical, and developmental),
- People with HIV/AIDS or other related diseases

DHCD’s role in serving the needs of special needs populations is mainly financing housing for older individuals and persons with other special needs, and financing physical modifications that make single family homes accessible to persons with mobility impairments. In the District, five percent of all new housing units developed must be accessible to persons with mobility impairments, and another two percent must be accessible to persons with visual or hearing limitations. DHCD aids in the enforcement of this requirement. Adding accessible housing is particularly needed in the District because the vast majority of its housing stock was built before the Americans with Disabilities Act went into effect, and is not accessible to disabled individuals. Additionally, DHCD has partnered with the Department of Mental Health (DMH) to develop 300 units of housing for DMH consumers, which includes individuals with severe mental illness, mentally and developmentally disabled individuals, formerly homeless persons, and graduates of the District foster care system.

In FY2011, DHCD will fund the development of 150 units of housing for special needs population. Additionally, DHCD will continue to administer the following programs that aid in the development of special needs housing:

- Single Family Residential Rehabilitation Program
- Multi-Family Housing Construction and Rehabilitation Program
- First Right Purchase Program
- Handicapped Accessibility Improvement Program

Source of Funds

Various resources exist to address the identified housing and supportive service needs of non-homeless special needs populations. Two major sources of federal funding assist DHCD in its efforts to address their housing and supportive service needs for the non-homeless special needs population: CDBG and HOME funds from the U.S. Department of Housing and Urban Development. The CDBG Program funds a variety of

housing and community development activities, including housing rehabilitation, acquisition, and predevelopment costs; public facilities and improvements; clearance and demolition, public services, and planning and administration. The HOME Program funds a variety of eligible affordable housing activities, including new construction, rental rehab, and homeownership assistance, (both direct and indirect), as well as administration for its HOME programs.

DHCD anticipates a similar level of HUD funding as in recent years, therefore, plans to spend approximately \$20 million on affordable housing for special needs populations in FY2011. As with its other housing and community development needs, the District's special needs housing programs require, whenever possible, maximum use of private financial resources. Because DHCD uses its funds to "close the gap" of needed financing for its selected projects, the private financing sector provides the bulk of each project's funds. Banks and other financial institutions serve as the private financing sources of all housing production, rehabilitation, or capital improvements and ongoing operations.

Many banks have special community lending operations, partly in response to the provisions of the Community Reinvestment Act, which encourages local lenders to invest in affordable housing and other community support projects. Several local banks have been active in supporting nonprofit affordable housing development. The District's public dollars leverage these private funds.

DHCD also works in tandem with non-profit and semi-governmental development organizations to leverage funds for affordable housing and economic opportunity. In addition, the District government and nonprofit developers have actively reached out to capture foundation grants. Many nonprofit organizations seek foundation funding to provide social support services, especially to special needs populations. Among the organizations that are active in this area are the Fannie Mae Foundation, Meyer Foundation, Local Initiatives Support Corporation, and the Enterprise Foundation.

HOPWA

DHCD is the HOPWA Formula Grantee for the Washington, DC Eligible Metropolitan Statistical Area (EMA). The District's, Department of Health, HIV/AIDS, Hepatitis, STD, and TB Administration (HAHSTA) is the sub-recipient of the HOPWA funds received by the District. The regional HOPWA allocation is administered and monitored by the DC Department of Health, HAHSTA. Funds are distributed through HAHSTA's various program. For further information, please see HOPWA FY2011 Annual Action Plan.

Chapter Six: Other

Fair Housing

DHCD's Fair Housing program, launched in February 2001, addresses the growing need for fair housing education among the city's stakeholders. Stakeholders include DHCD's Residential and Community Services and Development Finance Division grant sub-recipients, the non-profit and for-profit sector partners, the housing industry, and District residents in general. The program promotes fair housing and equal opportunity in housing and ensures compliance with federal fair housing and equal opportunity laws, rules, and regulations by community non-profit organizations, housing developers, and individual residents who receive program and project funding through DHCD. The Fair Housing program achieves these goals through

1. Education and Outreach

The Fair Housing program aims to educate city residents—particularly underserved populations such as immigrant communities, people with disabilities, and the elderly—about their fair housing rights in rental, sales, financing or home insurance transactions.

2. Partnerships

The Fair Housing Program partners with other governmental agencies, non-profit and private sector housing advocates and practitioners to affirmatively further fair housing and provide greater education coverage of housing and fair housing issues to a diverse community.

3. Affirmative Marketing

As a recipient of HUD funding, DHCD follows HUD's regulations for the Affirmative Fair Housing Marketing Plan (AFHMP). DHCD has instituted and continues to enforce a certification process for all of its housing projects (new construction and rehabilitation) as well as acquisition. The certification process ensures compliance with federal and local laws and regulations and ensures that housing construction projects and programs are affirmatively marketed and accessible to all protected populations. The process of certifying projects and programs is educational to the sub recipient, as their knowledge of fair housing compliance is enhanced thereby affirmatively furthering fair housing.

DHCD aims to ensure that prospective buyers or tenants in the housing market area, regardless of their protected category—racial or ethnic groups—are given an opportunity to be informed about prospective housing development(s) across the city and feel welcome to apply. For example, DHCD's bilingual housing locator tool, DCHousingSearch.org is available free of charge online and over the phone. Through the AFHMP, DHCD aims to (1) bring greater diversity to areas that have been subjected to housing discrimination based on the residents' protected class, and (2) inform about the availability of housing to persons not likely to apply for the housing without special outreach efforts due to (a) self or forced segregation, (b) linguistic isolation, (c) neighborhood racial or ethnic composition and patterns, (d) location, and (e) price of housing.

DHCD has also instituted a certification process for all its program and service grants. The certification process for programs, singular in the metropolitan area, ensures that non-housing activities associated with new construction and rehabilitation projects, and programs providing services also abide by the affirmative marketing principle. As such, DHCD requires completion of an 'Affirmative Marketing Plan (AMP)' certification form for those types of projects. For housing projects, the AFHMP certification is submitted

with accompanying information on residential housing projects of five units or more, whether these are located in one parcel or a scattered multi-family project

4. Language Access Act

The Language Access Act of 2004 (LAC) is designed to provide greater access and participation by Limited or No-English Proficiency (LEP/NEP) persons to public services, programs, and activities. The District's implementation and monitoring of the LAC supports the Fair Housing Act's affirmatively furthering fair housing by ensuring equal opportunity and accessibility of program and services to all District residents. Since 2001, DHCD has partnered with both the Mayor's Office on Latino Affairs and the Mayor's Office on Asian and Pacific Islander Affairs, and subsequently with the Mayor's Office of African Affairs to ensure the agency's programs of concern to these communities were available in the appropriate languages.

The agency has implemented the approved 2006 bi-annual Language Access Action Plan (2007-2008) by adhering to the LAC's five action objectives, these are: (1) a thorough review of each agency's mechanisms for data collection in order to design better outreach programs for target LEP communities, (2) the use of oral language (interpretation) services to ensure agency's message on how to access the programs and services reaching and being understood by these communities, (3) the translation of vital documents in the appropriate language of the community targeted which depicts agency information on how services are acquired or vital information which could have a direct impact to health or safety; (4) ensure cultural competency, awareness and sensitivity training is provided to staff, and (5) create targeted (LEP/NEP) community educational outreach material to ensure language barriers do not impede District residents from accessing programs and services. Each District agency reports on its LAC advances to the Office of Human Rights (OHR) on a quarterly basis. These results are analyzed yearly and are the basis for the agency's bi-annual plans and changes as recommended by OHR.

DHCD holds an annual diversity training to ensure its public contact personnel is well apprised of the law and compliance measures. For the past two years, the Agency has partnered with the D.C. Office to Planning to offer this training to its combined staff.

Currently, DHCD ensures that all LEP communities have the agency's information through its sub-recipients and directly through the agency's website where a fact sheet about the pertinent programs can be found for easy download. The program information is available in Amharic, Chinese, Spanish, and Vietnamese. DHCD has also ensured that a bilingual interpreter is available at its public hearings, when needed.

The Housing Regulation Administration formerly located within the District Department of Consumer Regulatory Affairs (DCRA) joined DHCD in Fiscal Year 2008. This addition has brought new opportunities to further engage and outreach the LEP community on DHCD programs and housing services.

5. Section 3

Section 3 of the Housing and Urban Development Act of 1968 (Section 3) provides for the training, employment and contracting opportunity of low and very-low income residents in a participating jurisdiction receiving housing and community development program funding from the Department of Housing and Urban Development (HUD). In particular, the Act dictates that priority in hiring should be given to public housing Section 3 residents. DHCD is the District's point agency for applying and enforcing this regulation. DHCD implements this policy through (1) projects funded by and through DHCD which awards funding grants to developers and its contractors; (2) partnerships with government agencies and community base organizations to facilitate or create training opportunities, and (3) the creation of employment and business opportunities for residents of and other qualified low- and very low-income persons residing in the geographical funded project area.

DHCD fully implemented its Section 3 program in Fiscal Year 2009 and the agency continues to expand the awareness of the Section 3 program through outreach and monitoring of all applicable projects. In 2009, all applicable Section 3 projects had Section 3 requirements. Implementation of the Section 3 policy included compliance and monitoring of projects, data collection and developing awareness of the program. Additionally, implementation of the Section 3 Business Concern certification continued in order to facilitate compliance with the program. DHCD continued to partner with the DC Housing Authority, the Office of Small and Local Business Development, and the Department of Employment Services to create greater awareness of Section 3 among residents and businesses. DHCD continued to provide an annual training to all of its sub-recipients to ensure full compliance.

The Section 3 program within DHCD is aimed at creating greater opportunities for recruitment and employment of low- and very low-income residents and business interests by DHCD funded developers working on contracts partially or wholly funded through HUD. To further support the intent and letter of the Section 3 regulations, DHCD has extended the Section 3 provisions to its locally funded projects; all projects funded through the agency must abide by the Section 3 policy. DHCD is also creating a data bank of all Section 3 Business Concerns registered and certified through DHCD.

Before being awarded a DHCD grant, all contractors and businesses seeking Section 3 preference must complete a Section 3 plan and be certified as a Section 3 Business Concern, as appropriate, as acknowledgement of the contracting and employment provisions required by Section 3.

Affirmatively Furthering Fair Housing

As an entitlement jurisdiction, the District must adhere to Section 808(e)(5) of the Fair Housing Act which provides for Affirmatively Further Fair Housing (AFFH). As part of this requirement, in addition to this five year Consolidated Plan, DHCD must conduct an Analysis of Impediments to Fair Housing Choice (AI) on a five-year interval as mandated by regulation. According to the HUD Fair Housing Planning Guide, an AI should include a comprehensive review of the District's "rules, regulations, business practices, administrative policies practices, and procedures, laws, legislation, and other factors created by the private and government sectors" which could directly or indirectly affect or create an impediment to "fair housing choice" in the District of Columbia. In addition, Section 104 of the Housing and Community Development Act of 1974 (24CFR Part 570.496(a) requires that each state to certify that it will affirmatively further fair housing.

a. Analysis of Impediments

To Affirmatively Further Fair Housing, the District is required to (1) Conduct an analysis to identify impediments (AI) to fair housing choice within the jurisdiction, (2) take appropriate actions to overcome the adverse effects of any impediments identified through the analysis, and (3) maintain records reflecting the analysis and actions taken in this regard.

In December 2005, DHCD completed the most recent AI. This analysis looked at private and government sectors' actions, omissions, or decisions that may have an ultimate effect of restricting housing choice. The District continues to address the four (4) major areas of impediments to fair housing choice found in the 2005 AI. These were:

- A lack of compliance of fair housing laws by the real estate and housing industry (real estate, lending/mortgaging, insurance/appraisals, etc),
- Decreasing number of affordable housing units for low and moderate-income households and special needs residents in target neighborhoods;

- Information on full range of housing available across many District neighborhoods offering affordable housing is not made available to individuals and families seeking homes due to segregated residential patterns, and
- Low levels of home buying literacy among particular protected classes and high levels of home seekers with no or poor credit history

In 2007, DHCD added a supplement to the 2005 AI by providing further guidance on the implementations of recommendations, thus assisting DHCD to increase fair housing choice among the city's residents

DHCD is in the process of completing the next five year AI, for FY 2011-2015. As part of this process, DHCD is conducting a series of roundtable discussions with selected advisory group participants. The advisory group(s), composed of key stakeholders, will ensure that the analysis reflect a cross-section of constituent views. In addition to these advisory group meetings, DHCD is conducting an investigative report that will provide a comprehensive analysis of the District's fair housing impediments. It is the goal of DHCD to have the AI completed by December of 2010, and focus on addressing the impediments to fair housing choice found, in the upcoming Consolidated Plan period FY 2011-2015.

b. Efforts to Remove Barriers to Affordable Housing

The District maintains support of measures to remove potential barriers to fair housing choice. Throughout the last five year planning period, the District worked to remove these barriers, some of which are identified below. Throughout this Consolidated Planning period, DHCD will continue to work toward these goals, and any newly identified goals, to remove barriers to affordable housing.

Rental Housing Conversion and Sale Amendment Act of 2005: The city continues to enforce the "*Rental Housing Conversion and Sale Amendment Act of 2005*" (Bill 16-050). This Act narrowed the 95 percent/5 percent loophole in the Rental Sale Conversion Act of 1980 which allowed rental property owners to circumvent the First Right of Refusal law thereby bypassing the tenant right to purchase their building once it was advertised for sale.

Inclusionary Zoning (IZ): Inclusionary Zoning (IZ) is a land use technique for developing diverse mixed-income communities by requiring each new residential development make a percentage of the new units affordable to targeted incomes. IZ in the District began with a set of public hearings held by the Zoning Commission starting in 2005. The Zoning Commission divided the hearing process into three parts covering 1) the design of program, 2) where it would apply in the District, and 3) how IZ requirements would interact with existing zoning overlays. At roughly the same time, the Council of the District of Columbia passed both the Comprehensive Plan for the National Capital and the Inclusionary Zoning Act of 2006, which gave policy guidance and empowered the Mayor to administer the program. In August of 2009, the District implemented the District's Inclusionary Zoning program, which affords private sector development companies the right to additional density for their projects in exchange for making at least 8 percent of the units in the project affordable.

Office of the Tenant Advocate (OTA): Tenants often don't know their legal rights as renters, frequently can't pay for legal representation and usually don't know how to use lower cost court mediation and adjudication services. The OTA was started to respond to these concerns about District tenants. For its first two years, OTA was housed within the Department of Consumer and Regulatory Affairs (DCRA). As of October 2007, the OTA is fully independent. The Chief Tenant Advocate advocates for, educates, and provides outreach for tenants in the District of Columbia.

Housing Regulation Administration: In 2008, the Housing Regulation Administration which houses the Rental Accommodations Division, the Rental Conversion and Sale Division and the Rental Housing

Commission—formerly located in the District Department of Consumer and Regulatory Affairs, moved to DHCD. This was, in part, an effort by the District to reduce barriers to fair housing by providing quicker response to apartment building conversion concerns which can affect low income and disenfranchised tenants

Residential and Community Services: DHCD has improved processes in its Residential and Community Services programs to effectively address underserved needs. It also continues to provide an annual training program for staff and funding recipients on fair housing and accessibility compliance for construction projects. As well, DHCD continues to monitor all its sub-recipients to ensure compliance with fair housing and equal opportunity laws and regulations. Fair Housing staff are also available as a resource for constituents and service providers.

Fair Housing Symposium: The District held its Seventh Annual Fair Housing Symposium in April 2008. This year, DHCD commemorated the 40th Anniversary of the passage of the FHA. As such, DHCD with its partners the DC Office of Human Rights and the National Fair Housing Alliance held a celebration of the milestones gained up until now. One key highlight was the presentation of the first fair housing case filed by the Department of Justice after passage of the law. The case was filed in the District of Columbia for race discrimination. The Eighth Annual Symposium is scheduled to take place on April 6, 2010.

Request for Proposals (RFPs): The bi-annual RFPs solicit proposals from community development corporations (CDCs) and private sector firms interested in creating affordable housing or community development projects. During this process, DHCD holds several community meetings to educate the developers about providing equal access opportunity to housing and building housing that is accessible to person with mobility disabilities.

Education and Outreach: The Department partners with non-profit and private sector housing advocates and practitioners to affirmatively further fair housing and to provide greater education coverage of housing and fair housing issues to a diverse community. One method is to fund community based organizations to provide outreach and education for tenants on purchase programs, comprehensive homeownership and housing counseling, and assistance for relocation and location of apartments. DHCD has contracted with University Legal Services, Latino Economic Development Corporation, Lydia's House, and Housing Counseling Services, among others, to provide housing to provide these services.

Accessibility Education and Enforcement: DHCD continues to hold an annual mandatory Section 504 accessibility compliance training program for all sub-recipients. The training covers practical and regulatory actions concerning accessible housing according to local building codes and its parallels to federal regulations and laws, multifamily projects compliance with the Sec. 504 accessibility rules and regulations of the Rehabilitation Act of 1973 and the Fair Housing Act as Amended.

Office of Human Rights: The DC Office of Human Rights is an agency of the District of Columbia government that seeks to eradicate discrimination, increase equal opportunity, and protect human rights in the city. The Office enforces the DC Human Rights Act of 1977 and other laws and policies on nondiscrimination and fair housing. The Office is also the advocate for the practice of good human relations and mutual understanding among the various racial ethnic and religious groups in the District of Columbia.

Department of Insurance Securities and Banking (DISB): Part of DISB's mission is to protect District residents from financial fraud and abuse by providing fair and efficient supervision of financial-service entities. Through education, training and outreach, DISB works to protect the interests of District consumers from unfair and abusive practices, including predatory lending practices.

Foreclosure Prevention: The District provides funding to the non-profit sector to provide outreach and education to residents victimized or at risk of a home foreclosure. Foreclosure prevention is an educational

tool highly utilized during as this housing crisis continues to evolve. The CBOs funded through DHCD discussed above provide foreclosure prevention training so that residents can be salvaged from losing their home. The training, provided in English and Spanish by some CBOs, seeks to provide individualized counseling, assess the delinquency status, and provide options and a work plan to alleviate the situation.

Homeownership Assistance: Likewise, other housing agencies and non-profit community development corporation also offer tools for assisting first time homebuyers and person in crisis. The D.C. Housing Finance Agency has a Home Resource Center dedicated to education and training to first time homebuyers on homeownership opportunities. Manna, Inc., a non-profit housing corporation which builds affordable housing also has its own first time home buyer training program and mortgage assistance program, through a sister organization, for low income residents citywide.

Economic Development

In FY2011, DHCD along with DMPED will continue to promote the revitalization of District neighborhoods in order to create job opportunities, affordable housing, commercial revitalization, public facilities (including parks, recreation centers, and multi-use facilities) and vibrant and safe places to live and work and to improve the general quality of life of District residents. In addition, DMPED will use a portion of FY2011 CDBG funds to carry out activities that support the development and disposition of properties previously acquired with public (largely through the former urban renewal program) and federal funds. DMPED will carry out these activities through individual development and facilities projects and through implementation of the Great Streets, New Communities, and Neighborhood Investment Fund programs.

Listing of Projects and Programs (Table 3c)

The following pages contain the U.S. Department of Housing and Urban Development-defined "Table 3's" that describes each of the District's programs and activities. The Tables 3 are grouped according to the District's major uses of HUD funds.

- **Residential Services** These DHCD program areas meet the HUD priority need of *Owner-Occupied Housing* by providing financial assistance to increase home purchases and for home rehabilitation.
 - Home Purchase Assistance Program
 - Employer Assisted Housing Program
 - Single Family Rehabilitation Program
 - Lead Safe Washington Program
- **Project Financing** This DHCD program area meets the HUD priority needs of *Owner-Occupied Housing, Rental Housing, Public Facilities, Infrastructure* and *Non-Homeless Special Needs* by providing financial support for owner-occupied and rental housing projects for both general and special needs populations, infrastructure for community development projects; and commercial and community facilities.
 - Property Acquisition and Disposition Program
 - Tenant Opportunity to Purchase Assistance Program
 - Community Facilities Program
 - Affordable Housing Program
- **Community Services** These DHCD program areas meet the HUD priority needs of *Economic Development, Public Services, Owner-Occupied Housing, and Rental Housing* by providing financing to community-based organizations for program delivery costs in the areas of small business technical assistance, housing counseling and other services.
 - Commercial Revitalization Program
 - Housing Counseling and Development Program

- Community Housing Development Organization (CHDO) Program
- Economic and Commercial Revitalization This District program area meets the HUD priority need of *Economic Development* by providing support for business and job development through financing mechanisms, for property management, acquisition (through condemnation), relocation services, demolition and clearance, environmental remediation and disposition services.
 - Skyland Shopping Center Program
 - Economic and Community Revitalization Program
- Public Facilities and Improvements This District programs are used to make public improvements and renovate public facilities in support of redevelopment. The projects may include, but are not limited to, improvements to or construction of walking trails, parks, playgrounds, flood and drainage systems, and utility lines (park lighting). Funds may also be used to enhance the aesthetics of public properties by providing such things as trees, sculptures, fountains, or works of art. This project may also include investments in public facilities that are either publicly owned (or traditionally provided by the government), or owned by a nonprofit, and operated for use by the general public.
 - Public Facilities & Improvements Program
- Agency Management This DHCD program area supports the Department's planning and administration efforts.
 - Agency Management Program
- Program Monitoring and Compliance This DHCD program area supports all HUD priority needs by ensuring that activities are carried out in compliance with federal and local regulations.
 - Program Monitoring and Compliance Program
 - Portfolio Management Program
- Homeless Support and Prevention This program area is overseen by DHS but carried out by the Community Partnership for the Prevention of Homelessness. In FY2011 starting with the HUD grant year 2010 funds, the oversight and administration of ESG funds by DHCD was transferred to DHS. Programs and activities support the HUD priority need of *Homeless/HIV/AIDS* through the delivery of Emergency Shelter Grant program funds for any or all of the following: homeless prevention, outreach and support, shelter renovation, rehabilitation and operations, and program administration.
 - Homelessness Prevention and Rapid Re-housing Program
 - Homeless Prevention Program
 - Shelter Operations Program
 - ESG Administrative Costs Program

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Owner-Occupied Housing

Project Title

Homebuyer Assistance (Home Purchase Assistance and Employer Assisted Housing Programs)

Project Description

The Home Purchase Assistance Program (HPAP) provides financial assistance in the form of interest-free loans to qualified District residents to enable them to purchase homes, condominiums or cooperatives units. Qualified households are eligible for loans to meet down payment and closing cost requirements. Assistance levels are determined by the Department each year based on (1) prevailing real estate market prices; (2) available budget, (3) levels of household income and size, and (4) each household's mortgage "financing gap", assistance provided to any individual household is further subject a to program-wide per-client caps determined each year. Loans are subordinate to private first trust mortgages. The D C Employer-Assisted Housing Program (EAHP) provides special home purchase assistance benefits to District government employees, including loans for down payment assistance, matching fund grants for closing costs, and credits toward District property and income taxes.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

Community-wide

Objective Number 41	Project ID FY2011 HPAP	
HUD Matrix Code 13	CDBG Cit 570 201(n)	HOME Cit 92 205(a)(1)
Type of Recipient Individuals & sub- recipients (for admin)	CDBG National Objective LMH	
Start Date 10/1/2010	Completion Date 9/30/2011	
Performance Indicator Housing units funded	Annual Units 400	
Local ID 6010	Units Upon Completion 400	

Funding Sources:

CDBG	\$4,738,200
CDBG Program Income	\$661,800
ESG	0
HOME	\$1,600,000
HOPWA	0
Economic Stimulus	\$2,883,333
Total Formula	\$9,883,333
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$8,379,431
Other Funding – private	0
Total	\$18,262,764

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs *Local appropriated funding & repayment of local appropriated funds (HPAP Repay)

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Owner-Occupied and Rental Housing

Project Title
Residential Rehabilitation Programs

Project Description

This project includes two program functional units The Single Family Residential Rehabilitation Program and the Multifamily Lead-Safe Program

The Single Family Residential Rehabilitation Program provides low-cost financing for the rehabilitation of owner-occupied single-family housing Eligible home improvements include (1) items to correct building code violations (items necessary to ensure that the home is decent, safe and sanitary), (2) modifications needed to make the home accessible to residents with mobility impairments (through the Handicapped Accessibility Improvement Program, or HAIP), and grant funding to control lead hazards related to lead-based paint and lead water service lines The program provides low- or no-interest amortized or deferred loans, or grant funds, depending on the financial circumstances of the borrower and the amount and type of rehabilitation required Single Family Rehab loans made to senior citizens have the first \$10,000 of assistance routinely deferred. HAIP provides up to \$30,000 in grant funding for improvements for handicapped accessibility Grant funds are also available for lead-based paint hazard remediation, replacement of lead water service lines, and emergency roof repair

The Multifamily Lead Safe Program provides grant funds to property owners to render their housing units (both owner-occupied and rental) safe from lead-based paint hazards

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location
Community-wide

Objective Number 43	Project ID FY2011 SFRRP	
HUD Matrix Code 14A & 14B	CDBG Citation 570 202	HOME Citation 92 205(a)(1)
Type of Recipient Individuals	CDBG National Objective LMH	
Start Date 10/1/2010	Completion Date 9/30/2011	
Performance Indicator Housing Units Assisted	Annual Units 145	
Local ID 6040	Units Upon Completion 145	

Funding Sources:

CDBG	0
CDBG Program Income	\$1,338,200
ESG	0
HOME	0
HOPWA	0
Economic Stimulus	\$1,753,285
Total Formula	\$3,091,485
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$3,048,529
Other Funding – private	0
Total	\$6,140,014

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs *Estimated leverage, public, Housing Production Trust Fund

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need

Owner-Occupied and Rental Housing

Project Title

Property Acquisition and Disposition

Project Description

The Property Acquisition and Disposition Division (PADD) consolidate the Homestead Housing Preservation Program, the Home Again Program, the Land and Housing Disposition Opportunities Program and other property acquisition and disposition functions into one division. The goal of PADD is to stabilize neighborhoods by (1) decreasing the number of vacant and abandoned residential properties in the District, and (2) transforming vacant and/or abandoned deteriorated properties into homeownership opportunities for District of Columbia residents at all income levels. PADD has three main functions that include encouraging property owners to rehabilitate and/or occupy their vacant and abandoned residential property, acquiring vacant, abandoned and deteriorated properties through negotiated friendly sale, eminent domain, donation or tax sale foreclosure when owners are unwilling or unable to maintain their properties, and disposing of properties in the PADD inventory by selling the properties to individuals or developers to be rehabilitated into high quality low- and moderate-income and market-rate for-sale or rental housing units.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

Community-wide

Objective Number 4 6	Project ID FY2011 PADD
HUD Matrix Code 01 & 02	CDBG Citation 570 201(a), 570 201(b)
Type of Recipient Sub-recipients (for technical assistance)	CDBG National Objective LMC
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator Property Acquired	Annual Units 45
Local ID 6030	Units Upon Completion 45

Funding Sources

CDBG	0
CDBG Program Income	0
ESG	0
HOME	0
HOPWA	0
Economic Stimulus	\$1,333,333
Total Formula	\$1,333,333
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$2,548,338
Other Funding – private	0
Total	\$3,881,671

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs *Represents HOME AGAIN local appropriated dollars

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Non-Homeless Special Needs

Project Title
Development Finance Division Project Financing, Acquisition for Rehab

Project Description

This portion of the Development Finance Project Financing for FY2011 (HUD 2010) finances sites acquired by for-profit and non-profit applicants to develop housing, including community-based residential facilities, for households with special needs, including the elderly, disabled, and individuals undergoing treatment for substance abuse. DHCD provides assistance for acquisition and acquisition/rehab project activities in the form of deferred or amortized loans to qualified organizations for eligible activities. The specific project activities that will receive funding are selected during our Request for Proposals (RFP) process that DHCD/Development Finance Division conducts to solicit project proposals. Selected projects are funded after completion of underwriting which takes 90 to 120 days following date of selection. A list of projects selected from the RFP is shown in Appendix H. When they complete underwriting, many of these projects will be executed and funded during FY2011.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location
Community-wide

Objective Number	Project ID
4.3	FY2011 DFDPF
HUD Matrix Code	CDBG Citation, 570.202
14G	HOME Citation, 92.205(a)(1)
Type of Recipient	CDBG National Objective
For-profit and non-profit organizations	LMH
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
Housing units acquired	550
Local ID	Units Upon Completion
2010	550

Funding Sources:	
CDBG	\$7,634,888
ESG	0
HOME	\$835,364
HOME Program Income	\$1,000,000
HOPWA	0
Economic Stimulus	\$18,260,574
Total Formula	\$27,730,826
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$10,060,437
Other Funding – private ±	0
Total	\$37,791,263

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs. * Other public funding includes primarily Housing Production Trust Funds, O-Type and LEAD Program Funds.
± Private funds include bank loans, developer equity and/or bond financing.

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need

Owner Occupied and Rental Housing / Community Facility

Project Title

Development Finance Division Project Financing, Rental Housing

Project Description

This portion of the Development Finance Project Financing for FY 2011 (HUD2010) provides low-cost project financing for the rehabilitation and new construction of affordable residential property containing five or more units. The specific project activities that will receive funding are selected during our Request for Proposals (RFP) process that DHCD/Development Finance Division conducts to solicit project proposals. Selected projects are funded after completion of underwriting which takes 90 to 120 days following date of selection. A list of projects selected from the RFP is shown in Appendix H. When they complete underwriting, many of these projects will be executed and funded during FY2011.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

Community-wide

Objective Number	Project ID
31	FY2011 DFDPF
HUD Matrix Code	CDBG Citation 570 202
14B	HOME Citation 92 205 (a)
Type of Recipient	CDBG National Objective
For-profit and non-profit organizations	LMH
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
Housing Units Financed	350
Local ID	Units Upon Completion
2010	350

Funding Sources:

CDBG	\$634,887
CDBG Program Income	\$3,000,000
HOME	\$6,033,419
HOPWA	0
Economic Stimulus	\$10,260,574
Total Formula	\$19,928,880
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$12,060,437
Other Funding – private ±	0
Total	\$31,989,317

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs * Other public funding includes primarily Housing Production Trust Funds, O-Type and LEAD Program Funds ± Private funds include bank loans, developer equity and/or bond financing

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Economic Development

Project Title
Community Services – Commercial Revitalization

Project Description

The purpose of this activity is to enhance the image and overall economic viability of neighborhood business districts by improving the function and appearance of individual commercial façades. Under the Storefront Façade Development activity, the Department will provide grants, through non-profit partners, to retail and commercial property owners for the enhancement of retail and commercial façades in targeted areas of the District. Generally, the Department will provide a grant of up to 80% of construction costs for façade improvements. An additional 20% is provided to the non-profit for administrative and management costs including outreach efforts, design fees, project management, and construction administration. All costs are for the direct delivery of services or completion of projects. Façade development projects may run more than one year, stretching from 18 months to two years for completion. Some funds allocated may be used to complete prior year projects.

Objective category ☐ Suitable Living Environment ☐ Decent Housing ☒ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☐ Affordability ☐ Sustainability

Location
Community-wide

Objective Number 9 2	Project ID FY2011 NBA NFD
HUD Matrix Code 14E, 14H	CDBG Citation 570 202
Type of Recipient Non-profit organization	CDBG National Objective LMA
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator Businesses assisted	Annual Units 40
Local ID 3000	Units Upon Completion 40

Funding Sources:	
CDBG	\$1,089,413
ESG	0
HOME	\$4,967
HOPWA	0
Economic Stimulus	\$550,000
Total Formula	\$1,644,380
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	\$1,704,967
Other Funding – private	0
Total	\$3,349,348

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Public Services

Project Title
Community Services – Housing Counseling and Development

Project Description

Through nonprofit community-based organizations, DHCD supports a broad range of housing services, including outreach, application intake and general counseling for several of the DHCD's programs. The emphasis in counseling is on homeownership, general home management and foreclosure counseling. The DHCD programs served include HPAP, LSW, First Right to Purchase Program, Homestead and Single Family Residential Rehabilitation program.

Objective category ☐ Suitable Living Environment ☐ Decent Housing ☒ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☐ Affordability ☐ Sustainability

Location
Community-wide

Objective Number	Project ID
33	FY2011 NBA HC
HUD Matrix Code	CDBG Citation
05	570 201(e)
Type of Recipient	CDBG National Objective
Non-profit	LMC
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
People/households	15,000
Local ID	Units Upon Completion
3000	15,000

Funding Sources:

CDBG	\$4,289,452
ESG	0
HOME	\$15,400
HOPWA	0
Economic Stimulus	\$55,000
Total Formula	\$4,359,852
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	\$32,989
Other Funding – private	0
Total	\$4,392,841

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Economic Development

Project Title
DMPED - Skyland Shopping Center

Project Description

In an effort to remain consistent with the approved plans for the area, DMPED plans to provide additional funds to support the redevelopment of the Skyland Shopping Center. The revitalization of the site is expected to provide over 300,000 square feet of retail and some residential housing. In FY11, activities may include, but are not limited to, acquisition of property (through condemnation), property maintenance pending redevelopment, demolition and clearance, environmental remediation, and relocation services and payments to existing businesses/ commercial tenants.

Objective category ☐ Suitable Living Environment ☐ Decent Housing ☒ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☐ Affordability ☒ Sustainability

Location

Good Hope Road at Naylor Road and Alabama Avenue, SE (Ward 7)

Objective Number 51	Project ID FY2011 DMPED
HUD Matrix Code 1 Acquisition 2 Disposition 4 Clearance and Demolition 8 Relocation	CDBG Citation 570 201 (a), 570 201(b), 570 201(i), 570 203
Type of Recipient Local Businesses	CDBG National Objective LMA
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator Businesses/Individuals	Annual Units 5 Businesses
Local ID 5030	Units Upon Completion 5 Businesses

Funding Sources:

CDBG	0
CDBG Program Income	\$1,800,000
ESG	0
HOME	0
HOPWA	0
Total Formula	\$1,800,000
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$1,800,000

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Economic Development

Project Title
DMPED - Economic Redevelopment and Revitalization

Project Description

The Economic Redevelopment and Revitalization Project is used to acquire, rehabilitate, construct and to provide services related to the creation of affordable housing, disposition, urban renewal completion, property management, demolition, clearance and redevelopment of District-owned properties in support of planned redevelopment and economic development projects or programs. The funds cover analyses, and other work product including, but not limited to, relocation related activities/services, appraisals, property maintenance, legal services, architectural and engineering services, environmental reviews and property acquisitions. Specific redevelopment projects on which funds may be expended include, but are not limited to: 6925 Georgia Avenue, NW, New Communities Initiative projects in the Barry Farm, Lincoln Heights, Northwest One, and Park Morton communities, Parcel 42 (7th and Rhode Island Avenue, NW), the redevelopment of The Strand Theater (5131 Nannie Helen Burroughs Avenue, NE), and the Parkside redevelopment project in Southeast.

In addition to CDBG federal funding, aforementioned activities may be funded through NIF, New Communities, Great Streets and other program funding DMPED receives.

Objective category ☐ Suitable Living Environment ☐ Decent Housing ☒ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☐ Affordability ☒ Sustainability

Location
Community-wide

Objective Number	Project ID
9.2	FY2011 DMPED
HUD Matrix Code	CDBG Citation
02, 04, 07, 08, 14B	570.201(a)(d)(h)(i), 570.205
Type of Recipient	CDBG National Objective
Local Businesses	LMA / LMH
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
Properties assisted	TBD
Local ID	Units Upon Completion
5030	1BD

Funding Sources:

CDBG	0
CDBG Program Income	\$3,200,000
ESG	0
HOME	0
HOPWA	0
Total Formula	\$3,200,000
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$3,200,000

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need

Planning/Administration/Financial Services

Project Title

Agency Management Program

Project Description

Community Development Block Grant (CDBG) funds may be used to pay reasonable program administration costs and carrying charges related to the planning and execution of community development activities assisted in whole or in part with funds provided under the CDBG or HOME programs. Up to 10% of the HOME fund allocation may be used to pay reasonable administrative and planning costs. Program administration costs include staff and related expenditures required for overall program management, coordination, monitoring, reporting, and evaluation. A separate function of program administration is financial services, whereby financial and budgetary information is provided to department program/administrative units in order to ensure the appropriate collection/allocation, utilization and control of city resources. Other activities eligible under this category include:

- ☐ Citizen participation costs,
- ☐ Fair housing activities,
- ☐ Indirect costs charged using an accepted cost allocation plan,
- ☐ Development of submissions or applications for Federal programs, and
- ☐ Certain costs of administering the HOME program or a federally designated Empowerment Zone or Enterprise Community

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

DHCD – 1800 Martin Luther King, Jr Avenue, SE, Washington, DC

Objective Number 10.2	Project ID FY2011 ADM
HUD Matrix Code 21A	CDBG Citation 570.206 HOME Citation 92.207 ESG Citation 576.21(a)(5)
Type of Recipient Government	CDBG National Objective N/A
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator Various	Annual Units Various
Local ID 1000	Units Upon Completion Various

Funding Sources:

CDBG	\$3,185,487
ESG	0
HOME	\$448,527
HOPWA	0
Economic Stimulus	\$955,056
Total Formula	\$4,589,070
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	\$6,559,720
Other Funding – private	0
Total	\$11,148,790

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
Planning/Administration

Project Title
Program Monitoring and Compliance / Portfolio Management

Project Description

The purpose of the Program Monitoring and Compliance activity is to provide oversight and monitoring services of DHCD projects to ensure the Department's use of project funds fully complies with HUD and District regulations. This particular activity ensures that federally-funded projects meet environmental requirements. It includes a Quality Assurance activity that provides program review and performance evaluation to DHCD and sub-recipients/contractors so they can operate in full compliance of regulations in the most effective and efficient manner possible. Program Monitoring and Compliance includes a fair housing compliance component to ensure subrecipients are abiding by local and federal fair housing and accessibility statutes. As well it includes a Section 3 component to ensure projects with a minimum of 100K provide employment opportunities and contracting to Section 3 individuals and businesses, respectively.

The Portfolio Management Division manages the Low Income Housing Tax Credit allocations including compliance requirements and other activities, it will also compile the DHCD expenditures to identify loans and grants created by the expenditures. The unit will complete and maintain an inventory of assets created by the DHCD expenditures from the Housing Production Trust Fund, CDBG funds, HOME funds, and other DHCD funds. The Unit will also be responsible for monitoring the recipients of the loans and grants for compliance with the terms and conditions of the transactions.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

DHCD – 1800 Martin Luther King, Jr Avenue, SE, Washington, DC

Objective Number 10.1	Project ID FY2011 PMC
HUD Matrix Code 21A	CDBG Citation 570.206 HOME Citation 92.207 ESG Citation 576.21(a)(5)
Type of Recipient Government	CDBG National Objective N/A
Start Date 10/1/2010	Completion Date 9/30/2011
Performance indicator Site visits / reports	Annual Units TBD
Local ID 7000	Units Upon Completion TBD

Funding Sources.

CDBG	\$552,542
ESG	0
HOME	\$552,906
HOPWA	0
Total Formula	\$1,105,448
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	\$1,167,118
Other Funding – private	0
Total	\$2,272,566

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need

Owner-Occupied and Rental Housing

Project Title

Neighborhood Based Activities – Affordable Housing Development

Project Description

In this activity, the Department provides grants to non-profit partners to conduct predevelopment activity (i.e. securing financing, obtaining permits and pre-marketing of housing units, etc.) for affordable housing for selected development projects in distressed areas of the District. In order to be eligible for this funding, organizations must have an approved HOME funded project. These projects are funded using HOME/CHDO funds in the form of operating grants.

Objective category ☐ Suitable Living Environment ☐ Decent Housing ☒ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

Community-wide

Objective Number	Project ID
44	FY2011 NBA AHD
HUD Matrix Code	HOME Citation
211	92 208
Type of Recipient	National Objective
Non-profit organization	LMH
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
Housing units assisted	0
Local ID	Units Upon Completion
3000	0

Funding Sources:

CDBG	0
ESG	0
HOME	\$467,300
HOPWA	0
Total Formula	\$467,300
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	0
Other Funding – private	0
Total	\$467,300

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs * Estimate of DFD funding for NBA Projects

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need

Owner-Occupied and Rental Housing

Project Title

Community Housing Development Organization (CHDO)

Project Description

The HOME program mandates 15% of the annual allocation be set-a-side for housing development activities undertaken by non-profit housing development organizations which have achieved the necessary requirements to be designated as a Community Housing Development Organization (CHDO). The Development and Finance Division, through a competitive process will solicit CHDO's to make applications for affordable housing development.

In this activity, the Department provides grants to non-profit partners to conduct development activity for affordable housing for selected development projects in distressed areas of the District. These projects are funded using HOME/CHDO funds in the form of loan or grants. All costs are for the construction of affordable housing.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

Community-wide

Objective Number	Project ID
4 5	FY2011 CHDO
HUD Matrix Code	HOME Citation
12	92 300
Type of Recipient	CDBG National Objective
Non-profit organizations	LMH
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units
Housing units financed	N/A
Local ID	Units Upon Completion
3000	N/A

Funding Sources*	
CDBG	0
ESG	0
HOME	\$1,401,946
HOPWA	0
Total Formula	\$1,401,946
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public*	0
Other Funding – private	0
Total	\$1,401,946

The primary purpose of the project is to help ☐ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☒ Housing Needs * Other public funding includes Housing Production Trust Fund

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
The Homeless

Project Title
Homelessness Prevention and Rapid Re-housing Program

Project Description

The District of Columbia proposes to administer the Homeless Prevention and Rapid Re-Housing program (HPRP) to prevent new episodes of homelessness and reduce the length of homelessness for those who have become homeless. Under HPRP, financial assistance will be provided to prevent individuals and families from becoming homeless. Services will be provided to help those experiencing homelessness to be rapidly re-housed and stabilized. The District will do so through community outreach efforts; conducting uniform assessments; providing prevention assistance; and through Rapid Re-housing efforts. The District will work through community based organizations and government intake offices to reach out to those at risk of homelessness before they become homeless.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location
Community-wide.

Objective Number	Project ID
1.1	FY2011 HPRP HP
HUD Matrix Code	Citation
05Q	576.21(a)(4)
Type of Recipient	CDBG National Objective
Families & individuals	N/A
Start Date	Completion Date
10/1/2010	9/30/2011
Performance Indicator	Annual Units:
People Assisted	TBD
Local ID	Units Upon Completion
4000	TBD

Funding Sources:	
CDBG	0
ESG	0
HOME	0
HOPWA	0
Economic Stimulus	\$3,900,841
Total Formula	\$3,900,841
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$3,900,841

The primary purpose of the project is to help: ☒ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☐ Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
The Homeless

Project Title
Emergency Shelter Grant Program – Homeless Prevention

Project Description

In partnership with the D.C. Emergency Assistance Fund ("DCEAF"), the Partnership will make emergency homeless prevention assistance available for approximately 109 families averaging \$1,530 of assistance per family and 56 single adults at an average of \$1,325 each. The funds will be used in accordance with ESG regulations.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location (See Table 6 for exact locations)

Community-wide. The intake sites for emergency assistance will be the Virginia Williams Family Resource Center, Change, Inc., Catholic Charities Family Centers, All Faith Consortium, Bread for the City, the Near NE Community Improvement Corporation, Community Family Life Services, United Planning Organization, Plymouth Congregational Church, Refuge of Hope, Capitol Hill Group Ministries, Salvation Army, Capitol Hill Group Ministries, Emmaus Services for the Aging, Greater Washington Urban League, Mother's Dear's Community Center, My Sister's Place

Objective Number 1.1	Project ID FY2011 ESG HP
HUD Matrix Code 05Q	ESG Citation 576.21(a)(4)
Type of Recipient Families & individuals, through nonprofits.	CDBG National Objective LMC
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator People Assisted	Annual Units: 165
Local ID 4000	Units Upon Completion 165

Funding Sources:

CDBG	0
ESG	\$240,870
HOME	0
HOPWA	0
Total Formula	\$240,870
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$240,870

The primary purpose of the project is to help: ☒ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☐ Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
The Homeless

Project Title
Emergency Shelter Grant Program – Shelter Operations

Project Description

ESG funds will be used to pay operating costs for the Park Road Family Shelter (45 units), 1448 Park Rd., N.W., Washington, D.C. and shelter operating costs (not including personnel) for additional emergency shelter capacity at sites to be determined.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☒ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location
1448 Park Road NW, Washington, DC 20010

Objective Number 1.2	Project ID FY2011 ESG - ESSO
HUD Matrix Code 03T	ESG Citation 576.21(a)(3)
Type of Recipient Homeless families	CDBG National Objective LMC
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator Families sheltered	Annual Units 45 Units
Local ID 4000	Units Upon Completion 45 units

Funding Sources:

CDBG	0
ESG / S+C	\$3,921,885
HOME	0
HOPWA	0
Total Formula	\$3,921,885
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$3,921,885

The primary purpose of the project is to help. ☒ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☐ Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name District of Columbia

Priority Need
The Homeless

Project Title
Emergency Shelter Grant Program – Administrative Costs

Project Description

ESG funds will be used towards the costs of Partnership staff involved in carrying out ESG-eligible administrative activities, to include, program and fiscal monitoring of the ESG-funded activities. Administrative funds may also be passed to fund the administrative functions of the Foundation for the National Capital Region (for DCEAF) and/or the Family Support Collaboratives and the Virginia Williams Family Resource Center.

Objective category ☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity
Outcome category ☐ Availability/Accessibility ☒ Affordability ☐ Sustainability

Location

801 Pennsylvania Avenue, SE, #360, Washington, DC 20003

Objective Number 1.0	Project ID FY2011 ESG - SO
HUD Matrix Code 21A	ESG Citation 576.21(a)(5)
Type of Recipient Nonprofit	CDBG National Objective N/A
Start Date 10/1/2010	Completion Date 9/30/2011
Performance Indicator N/A	Annual Units N/A
Local ID 4000	Units Upon Completion N/A

Funding Sources:

CDBG	0
ESG	\$34,004
HOME	0
HOPWA	0
Total Formula	\$34,004
Prior Year Funds	0
Assisted Housing	0
PHA	0
Other Funding – public	0
Other Funding – private	0
Total	\$34,004

The primary purpose of the project is to help: ☒ the Homeless ☐ Persons with HIV/AIDS ☐ Persons with Disabilities ☐ Public Housing Needs

Chapter Seven: 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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace,
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

Chapter Seven: Certifications

- (c) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6

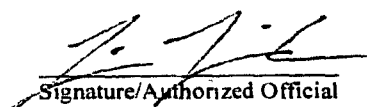
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

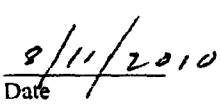
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the 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 sub-recipients 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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.


Signature/Authorized Official


Date

Director, DHCD

Title

Specific CDBG 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 housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 certifies that 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 activities which the grantee certifies are designed to meet other community development needs having a 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);
- 2 **Overall Benefit.** The aggregate use of CDBG funds including Section 108 guaranteed loans during program year(s), (a period specified by the grantee consisting 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.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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:

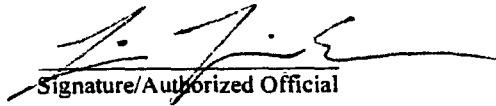
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility 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 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations

Chapter Seven: Certifications

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/Authorized Official

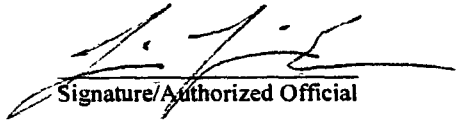
2/11/2010
Date

Director, DHCD
Title

OPTIONAL CERTIFICATION
CDBG

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 a 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 a 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/Authorized Official

2/11/2010
Date

Director, DHCD
Title

Specific HOME Certifications

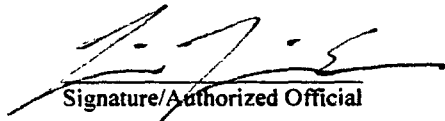
The HOME participating jurisdiction certifies that:

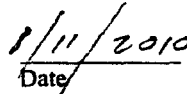
Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

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.

Appropriate Financial Assistance -- 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/Authorized Official


Date

Director, DHCD
Title

Specific ESG Certifications

The Emergency Shelter Grantee certifies that:

Major Rehabilitation/Conversion -- It will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 10 years. If the jurisdiction plans to use funds for rehabilitation (other than major rehabilitation or conversion), the applicant will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 3 years.

Essential Services and Operating Costs -- Where assistance involves essential services or maintenance, operation, insurance, utilities and furnishings, it 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 as long as the same general population is served.

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

Supportive Services -- It will assist homeless individuals in obtaining appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living, and other Federal State, local, and private assistance.

Matching Funds -- It will obtain matching amounts required under 24 CFR 576.51.

Confidentiality -- It will develop and implement 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, it will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, operating facilities, and providing services assisted through this program.

Consolidated Plan -- It is following a current HUD-approved Consolidated Plan or CHAS.

Discharge Policy --- It has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS -- It will comply with HUD's standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.



Signature/Authorized Official

8/11/10

Date

Director, DHS

Title

Specific HOPWA Certifications

The HOPWA grantee certifies that:

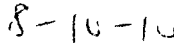
Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

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

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature/Authorized Official



Date

Senior Deputy Director, HAHSTA
Title