

# County Council of Howard County, Maryland

2024 Legislative Session

Legislative Day No. 4

## Resolution No. 39 -2024

Introduced by: The Chairperson at the request of the County Executive

Short Title: Adopting – Annual Action Plan

Title: A RESOLUTION adopting Howard County’s Annual Action Plan for housing and community services to qualify for the receipt of federal Community Development Block Grant and Home Investment Partnership Program funds.

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Introduced and read first time \_\_\_\_\_, 2024.

By order \_\_\_\_\_  
Michelle Harrod, Administrator

Read for a second time at a public hearing on \_\_\_\_\_, 2024.

By order \_\_\_\_\_  
Michelle Harrod, Administrator

This Resolution was read the third time and was Adopted\_\_\_, Adopted with amendments\_\_\_, Failed\_\_\_, Withdrawn\_\_\_, by the County Council on \_\_\_\_\_, 2024.

Certified By \_\_\_\_\_  
Michelle Harrod, Administrator

NOTE: [[text in brackets]] indicates deletions from existing law; TEXT IN SMALL CAPITALS indicates additions to existing law; ~~Strike-out~~ indicates material deleted by amendment; Underlining indicates material added by amendment

1           **WHEREAS**, the Department of Housing and Urban Development ("HUD") has  
2 determined that Howard County qualifies as an Urban County and is eligible to receive funds  
3 under the Community Development Block Grant ("CDBG") and Home Investment Partnership  
4 Program ("HOME"); and  
5

6           **WHEREAS**, the primary objective of HUD in awarding CDBG and HOME funds is to  
7 develop viable urban communities by providing funding and programs to ensure decent housing,  
8 suitable living environments, and expanded economic opportunities, principally for persons of  
9 low and moderate incomes; and  
10

11           **WHEREAS**, in order to keep Howard County eligible to receive Entitlement Grants, the  
12 County Council approved a Consolidated Housing Plan by adopting Council Resolution No. 54-  
13 2020 on May 4, 2020; and  
14

15           **WHEREAS**, in order to obtain the yearly entitlement of CDBG and HOME funds, the  
16 County must adopt an Annual Action Plan that implements the Strategic Plan as required under  
17 the Consolidated Housing Plan.  
18

19           **NOW, THEREFORE, BE IT RESOLVED** by the County Council of Howard County,  
20 Maryland this \_\_\_\_\_day of \_\_\_\_\_, 2024 that it adopts the Howard County Annual  
21 Action Plan Federal Fiscal Year 2025 in substantially the form as attached hereto for purposes of  
22 qualifying for Community Development Block Grant and Home Investment Partnership Program  
23 funds.

# FFY2024 Annual Action Plan

**DRAFT**

## Howard County, MD



Howard County Department  
Of  
Housing and Community Development  
9820 Patuxent Woods Drive, Suite 224  
Columbia, MD 21046

Director, Kelly A. Cimino



**Howard County Department of Housing and Community  
Development (DHCD)  
Annual Action Plan (July 1, 2024 – June 30, 2025)**

**AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

**1. Introduction**

In accordance with federal requirements for jurisdictions receiving funds from the United States Department of Housing and Urban Development (HUD) for housing and community development programs, Howard County has prepared its FFY2024 Annual Action Plan (Draft), as the fifth and final year of the five-year Consolidated Plan (FFY2020-2024). In alignment with the goals of the Consolidated Plan, this Action Plan outlines how the County will use and leverage federal resources to address current and anticipated housing and community development needs of Howard County’s low- to moderate-income population.

The most common housing problem in Howard County, as reported by community partners and stakeholders, is housing affordability. This persistent need, noted in previous years, is exacerbated by the ongoing direct and indirect impacts of the COVID-19 pandemic. A year and nine months after the federally declared end of the Public Health Emergency, residents of Howard County continue to experience adverse impacts, including loss of jobs, evictions, lack of affordable housing, homelessness, food instability, substantial rent arrears, lack of reliable transportation, insufficient resources to repair or rehabilitate rented or owned properties, and needs for housing to accommodate residents with disabilities and special needs. At the same time, the County is experiencing a shortage of affordable housing units. The Self-Sufficiency Indicators Report published by the Association of Community Services of Howard County (ACS) states that, “in 2022, there were no affordable apartments in the county for about 7,567 households. The shortage was particularly acute for those with annual incomes between \$30,000 and \$50,000 and for seniors with incomes below \$30,000.”

The combined effect of these impacts, and an ongoing affordable housing shortage, increases vulnerability, while simultaneously decreasing the capacity and resources to endure hardship, which in turn makes moving towards stability either extremely difficult or unattainable for low- and moderate-income households.

The Howard County Department of Housing and Community Development (DHCD) has leveraged its role as federal grantee and local funder to distribute funding and resources where they are needed most to serve Howard County’s most vulnerable families and households.

The FFY2024 Action Plan is a continuation of and builds off the four previous annual action plans and the 5-Year Consolidated Plan goals. There are two major updates to note: 1) A new, three-person team is in place, including the Division Chief, HOME Specialist, and Grant Specialist for COVID-related funding programs. One team member has worked with Howard County for four years, of which fifteen months has been with this department. Two team members relocated: one from Florida, one from California. All are grants professionals who bring complementary skills, experience, and knowledge to the Grants Division. Over the course of this fifth and final year, the team is developing and implementing a strategic work plan to strengthen and integrate the work of the agencies who provide direct assistance to Howard County residents.

With a fully staffed division working strategically to address the needs of the County's most vulnerable populations, we are adding two projects under the Section 108 Loan program that will preserve and significantly expand affordable housing opportunities by replacing two aging complexes with higher density, modern, mixed income communities.

As needs have been identified throughout the FFY2024 Action Plan process, DHCD plans to fund a wide range of services and programs to include affordable housing acquisition, rehabilitation, preservation, emergency shelter, transitional housing, affordable housing for persons with disabilities, special needs populations, victims of domestic violence and human trafficking, and working families earning between 30-60% AMI throughout the County. Services include housing advisory services, community outreach and advocacy, and educational programming.

To encourage low- and moderate-income households to pursue homeownership, DHCD is working with income eligible households to move towards this goal by providing access to down payment assistance that makes a home purchase more affordable, plus financial literacy education to make the process and ongoing responsibility of owning a home more understandable, and therefore, more manageable.

#### **PR-05 Lead & Responsible Agencies**

Howard County's Department of Housing and Community Development is the administrating agency for the CDBG and HOME programs. DHCD prepares the Five-Year Consolidated Plan, Annual Action Plans, Environmental Review Records (ERRs), the Consolidated Annual Performance Evaluation Reports (CAPER). DHCD also performs monitoring and oversight of the funding programs on an ongoing, day to day basis. DHCD also leverages CDBG and HOME funds with local county funds to assist non-profit agencies providing essential needs to low- and moderate-income households.

#### **AP-10 Consultation**

The Citizen Participation Plan calls for holding five (5) public forums for interested and/or impacted residents, and the nonprofit agencies that serve them, to learn, comment, and ask questions about the funding programs and propose future program priorities. To date, the DHCD has advertised and held four (4) public forums. Needs Hearing #1 (Dec. 14, 2023) and

Needs Hearing #2 (Jan. 4, 2024) were advertised in the *Baltimore Sun* on Nov. 30 and Dec. 7, 2023, and The *Howard County Times* on Dec. 7 and Dec. 14, 2023. The Public Notices were posted on the County website page on the same date as the first newspaper advertisements and remain posted on the internet until the forums concluded.

In the *Howard County Times*, DHCD published a Notice of the 30-day Public Comment Period and Public Hearing #3 on February 29, 2024. To more specifically reach residents impacted and/or interested in the CDBG and HOME programs, plus the new Section 108 Loan Program activities, DHCD is no longer publishing in the *Baltimore Sun*. Instead, DHCD is distributing the Public Notices to the six (6) branches of the County's public library, as well as posting the notices on the entrances to DHCD office, which are shared with other organizations that serve the County's extremely low, low-, and moderate-income residents and households.

Public Notice for the upcoming Public Hearing #4 at the meeting of the Howard County Housing and Community Development Board (April 11, 2024) and the subsequent County Council vote on funding recommendations at Public Hearing #5 (April 18, 2024), will post two weeks prior to these meetings. The Public Notices are posted on the County website on the same days as the first newspaper publication of the notices and remain on the internet until each public hearing concludes.

In addition to inviting input from the public, DHCD emails invitations to an internal stakeholder list for CDBG, HOME, and County funding programs. The list includes previous grantees, applicants who were not funded, and interested stakeholders.

The County maintains a stakeholder contact list for the CDBG and HOME programs. All stakeholders received notification emails about the public hearings and council meetings. These emails were sent at the same time of the publishing of the first newspaper posts. Immediately following Needs Hearing #2, when DHCD reviewed CDBG and HOME programs and the amounts of funding available for specific activities, the presentation was emailed to all attendees and, upon request, to stakeholders on the internal stakeholder list.

The Draft Annual Action Plan will be displayed at the Department of Housing and Community Development's office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046, and on the County's website at <http://www.howardcountmd.gov/DHCD-Grants> from Feb. 29, 2024 through April 1, 2024.

### **AP-12 Participation**

Representatives from twenty-eight (28) non-profit agencies attended Needs Hearing #1; Representatives from twenty-one (21) non-profit agencies attended Needs Hearing #2. Six (6) agencies accessed DHCD's Technical Assistance time slots for further guidance on application submission. A total of 14 funding applications were received: thirteen (13) for CDBG funds and one (1) for HOME funds. An additional six (6) applications for County funds were received. A grant scoring panel, comprised of five County employees with specific expertise (budgets, procurement, nonprofit experience, housing/homelessness) used a scoring rubric to rate

applications. Through this process, DHCD identified the need for future technical assistance in packaging effective grant proposals (narratives, budgets, supplementary material), as well as revisiting DHCD's paper-intensive process.

In the effort to increase public awareness and participation, DHCD will distribute all Public Notices of Hearings and Meetings to the County library's administrative office and six (6) branches for display to the public, in addition to posting in the *Howard County Times*. DHCD is also posting public notices on its office entrance to its offices, which is shared with other agencies and County departments serving low- to moderate-income households in Howard County.

### **AP15 – Expected Resources**

Based on the previous four fiscal years, the County anticipates level, or close to level, funding allocations from HUD for the upcoming fiscal year (July 1, 2024 - June 30, 2025) for \$1,310,347,000 in CDBG funds and \$573,996 in HOME funds. After the Howard County Council votes on DHCD's funding recommendations in May 2024, conditional award letters will go to potential sub-recipients. Following the receipt of HUD's funding award letter, Howard County will adjust the subaward amounts to the nonprofit agencies in alignment with the HUD allocations. Funding award levels may increase or decrease without notice, and DHCD will work to meet overall needs as equitably as possible.

### **AP20 – Annual Goals and Objectives**

This fifth and final year of the Department of Housing and Community Development's 5-Year Consolidated Action Plan, will leverage its CDBG and HOME funds to complete the following affordable housing goals during FFY 2024.

- Rehab fifty-five (55) existing affordable housing units - incomes below 80% AMI;
- Acquire three (3) existing units to provide affordable family housing for households below 60% AMI;
- Add 4 homeownership units with Downpayment Assistance – incomes below 80% AMI;
- Provide rental assistance to 58 households, preventing homelessness; and
- Provide safe sheltering, through emergency and transitional shelters, for 110 households experiencing homelessness.

As noted in the summary, Howard County plans to fund a wide range of services and programs to include affordable housing acquisition, rehabilitation, preservation, emergency shelter, transitional housing, affordable housing for persons with disabilities, special needs populations, survivors of domestic violence and human trafficking, and working families earning between 30-60% AMI throughout the County. In addition to the services stated above, funding will support housing advisory services, community outreach and advocacy, and educational programming.

## **AP35 – Projects**

### **Community Development Block Grant Projects (CDBG)**

In addition to DHCD Program Planning and Administration, CDBG funds will support these vitally important projects (full descriptions found in the AP-35 Chart):

#### **1. REBUILDING TOGETHER, HOWARD COUNTY**

As part of the national nonprofit organization dedicated to providing rehabilitation of residential structures to provide decent, safe, and affordable housing for low- to moderate-income households, Rebuilding Together of Howard County has provided free home repairs to residents for 32 years. The average income of a client is \$29,000/year. With CDBG funds, Rebuilding Together will provide free home repairs for 50 low-income homeowners.

#### **2. HOPE WORKS**

Providing a wide range of services to people who have experienced domestic violence, Hope Works is an integral member of the County's Continuum of Care. CDBG funds will support the Transitional Housing Program for approximately 30-40 clients who are experiencing homelessness because of Domestic or Intimate Partner Violence.

#### **3. COMMUNITY ACTION COUNCIL**

Howard County residents, at or below 80% AMI, who are at risk of becoming homeless due to eviction, or who need assistance with first month's rent, are served by this longstanding organization. This program will maintain housing for 41 households, including veterans, families with children below five, single parents, persons over the age of 65, and individuals who identify as Black or African American. The program ensures housing stability and reduces the need for cost-intensive homelessness programs.

#### **4. GRASSROOTS CRISIS INTERVENTION CENTER**

The most vulnerable residents are served by the Grassroots Emergency Shelter including those with a mental health diagnosis, substance abuse problem, serious physical health condition, and/or who fall in the Extremely Low to Low CDBG Income Limits Range (0-50%). CDBG funds will support the Family Shelter Program that will serve 40 households (90 individuals) and the Men's Shelter Program (50 individuals).

#### **5. THE ARC OF HOWARD COUNTY**

The Arc will use CDBG funds for renovations to seven locations that provide safe, healthy, and affordable housing for vulnerable County residents with intellectual and/or developmental disabilities (I/DD) who income-qualify. The project will benefit approximately sixteen (16) residents with I/DD in six (6) residential houses, 200 individuals with I/DD supported by a variety of day programs, and a staff of 70 working throughout the six sites in rotating shifts around the clock.

#### **6. COLUMBIA HOUSING CENTER**

Through housing advisory and educational programming, Columbia Housing Center champions the original vision of founding developer James Rouse for integrated neighborhoods that are welcoming and attractive to all. The Affirmative Marketing Program furthers fair housing in Columbia, Maryland, in accordance with the Federal Fair Housing Act.

Also, DHCD maintains multi-year commitments of CDBG funding to these vitally important projects:

### **1. ROGER CARTER COMMUNITY CENTER**

In collaboration with the Howard County Housing Commission, DHCD invests annual CDBG funds under an approved pre-award strategy to support this key facility for neighborhood revitalization, while meeting HUD's National Objective for Low-Mod Area Benefit. DHCD is invested for forty (40) years (06/01/03 - 06/01/2043) in the Roger Carter community Center to ensure the continued well-being of the residents of Burgess Mill Station and surrounding Ellicott City neighborhoods. The Center includes a swimming pool, splash pad, gymnasium, dance room, meeting rooms, fitness rooms, rock climbing wall, walking track & more.

### **2. HOWARD COUNTY HOUSING COMMISSION**

Established in 1990 as the public housing authority for Howard County, the Howard County Housing Commission operates a 'safe house' on several acres of land in a "campus-like" setting that provides housing for low- and moderate-income women and mothers who are victims of domestic violence. The facility houses a maximum of 10 individuals and one (1) on-site residential director.

### **3. BALTIMORE METROPOLITAN COUNCIL (BMC)**

DHCD is a member of the BMC, a consortium of Regional Participating Jurisdictions and Public Housing Authorities that contribute to the total funding of BMC's Housing Policy Coordinator position, an essential position for carrying out the Baltimore Regional Fair Housing Action Plan and in developing an Analysis of Impediments (AI) Report. DHCD contributes 7.5% annually to BMC for this purpose.

### **In response to the persistent need for affordable housing in Howard County, DHCD is leveraging funds from the Section 108 Loan Program to support these critically important projects, Waverly Winds and Ranleigh Court Apartment Complexes:**

Ranleigh Court and Waverly Winds are part of a 300-unit portfolio known as Community Homes (the "Portfolio"). The properties were developed in the late 1960's and early 1970s and are nearly identical in appearance, consisting of 2- and 3-story townhomes and 1-bedroom flats. The properties are supported by a Housing Assistance Payment ("HAP") Contract through HUD (Contract Number MD06L000006) and are subject to a HUD Use Agreement that requires 40% of units to be made affordable to households at 50% AMI, and the remaining units to be restricted to households at 80% AMI or less. At approximately 50 years of age, the properties are functionally obsolete. After extensive consultation with the existing resident community, the communities are proposed to be demolished and replaced with new, higher density, multifamily structures.

Ranleigh Court currently consists of 41 apartment units. The community is proposed to be redeveloped by replacing the existing structures with a new 82-unit multifamily building with

new amenity spaces and onsite leasing office. The new community will preserve all existing affordability and add new workforce and market rate units.

Waverly Winds consists of 62 units currently and is proposed to be 123 units in two new multifamily buildings. In both redevelopments, the affordability and unit types will be preserved, and additional workforce and market rate housing will be added.

Ranleagh Court and Waverly Winds are owned, through an affiliate, by Enterprise Community Development, Inc. (“ECD”), a non-profit organization with extensive experience as an owner and developer of affordable housing. ECD will continue to own the properties after redevelopment, and to execute the transactions before the properties will be transferred to new single purposes entities controlled by ECD (additional ownership information can be found in Exhibit C). Ranleagh Court will be financed primarily with 4% LIHTC equity, a Section 221(d)(4) HUD-insured loan, and soft debt from the State of Maryland DHCD, Community Homes Housing Inc., and Howard County. The Community Homes HAP Contract will be bifurcated and allow for 29 project-based rental assistance units. Waverly Winds is a “twin” project consisting of two separately financed components. One building, with 55 units (including 28 HAP-assisted units), will be financed primarily with 9% LIHTC equity and is referred to herein as the “9% Project.” The second building, with 68 units (including 14 HAP-assisted units), will be financed primarily with 4% equity and soft debt from the State of Maryland DHCD, Community Homes Housing Inc., and Howard County. As a result of construction cost increases and interest rate hikes, the projects face a funding shortfall for which Howard County wishes to provide Section 108 assistance. Specifically, Section 108 funds will be used to support costs associated with relocation, demolition and remediation, and site preparation.

The redevelopments are squarely in alignment with the Howard County HUD Consolidated Plan (see Exhibit A for details) and meet the CDBG national objective of “activities benefitting low- and moderate-income persons” (§570.208(a)).

**HOME Partnership Funds will support these vitally important projects:**

**1. iHOMES/HUMANIM**

iHomes is a part of the Howard County Continuum of Care system and a private, non-profit Community Housing Development Organization (CHDO). With HOME Funds, iHomes will acquire two (2) properties to accommodate six (6) residents. iHomes residents are adults with incomes at or below 30% of area median income and who are diagnosed with a developmental or psychiatric disability. A majority are Medicaid recipients with an average annual income of \$12,552.

**2. SETTLEMENT/DOWNPAYMENT LOAN PROGRAM (SDLP)**

With HOME funds, DHCD will provide Settlement and Downpayment Loan Payment assistance for four (4) income eligible, prospective homebuyers in Howard County.

### **AP50 – Geographic Distribution**

Howard County will direct CDBG and HOME funds countywide. It is the policy of Howard County that activities will not be qualified based on service area benefit. On June 4, 2014, Howard County passed Bill No. 18-2014, an Act amending the Rehabilitation Loan Program to allow loans for renovations and expansions; amending the moderate income housing unit provisions to prohibit certain alternatives in certain areas; requiring the use of fee in lieu funds for homeownership opportunities in certain areas; prohibiting the Department of Housing and Community Development and the Housing Commission from participating in certain housing projects; and generally related to moderate income housing units and the Rehabilitation Loan Program in Howard County. Specific to CDBG and HOME funds, the Bill restricted the County from providing funding for the construction of housing in Census Tracts and Block Groups if the poverty level is 10% or greater. The purpose of the Bill was to address concentration of subsidized housing and to encourage future affordable housing development outside of areas of concentration thus affirmatively furthering fair housing.

The County has allocated its CDBG and HOME Program funds for FFY2024 based on which activities will principally benefit low- and moderate-income persons.

The Public Facilities activities serve a low- and moderate-income clientele or presumed benefit.

The Housing activities have an income eligibility criterion; therefore, the income requirement restricts funds to only low- and moderate-income households throughout the County.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects. The most recently completed program year is FFY2023. The 2022 Consolidated Annual Performance and Evaluation Report (CAPER) contained the following observations:

**Howard County made good progress towards its Consolidated Plan goals over this last fiscal year:**

- **Homeowner Rehabilitation:** The County assisted 27 homeowner units (CDBG)
- **Renter-Occupied Rehabilitation:** The County assisted 9 renter households (CDBG)
- **Facilities & Improvement Rehabilitation:** The County assisted 3 units which serve persons with severe disabilities, and created affordable childcare services (CDBG) that benefitted 59 low-income households.
- **Affordable Housing Acquisition:** The County assisted 2 units (CDBG)
- **First Time Homebuyer Assistance:** The County assisted 4 households (HOME)

During FFY2023, the County was able to rehabilitate seventeen (17) homeowner and thirty-two (32) rental housing units to increase safety and help preserve affordable housing for low-income families living in them.

CDBG was also used to create one (1) additional unit of affordable housing for low-income families working in Howard County and in need of affordable housing.

In addition, CDBG was used to rehabilitate three (3) public facilities to preserve access to programs for persons with severe disabilities; and, to provide affordable daycare services for income eligible Howard County households. HOME Program funds were used to assist four (4) moderate-income families to achieve homeownership with down payment and closing cost assistance.

Through CDBG public service funding, 797 individuals were diverted from homelessness through housing stabilization funding; 118 homeless individuals accessed critical social and support services for both the sheltered and unsheltered homeless; 10 households which were victims of domestic violence/human trafficking were provided safe sheltering after fleeing situations of violence.

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

The Citizen Participation Plan calls for holding five (5) public forums for interested and/or impacted residents, and the nonprofit agencies that serve them, to learn, comment, and ask questions about the funding programs and propose future program priorities. To date, the County has: advertised and held four (4) public forums. Needs Hearing #1 (Dec. 14, 2023) and Needs Hearing #2 (Jan. 4, 2024) were advertised in the *Baltimore Sun* on Nov. 30 and Dec. 7, 2023, and The *Howard County Times* on Dec. 7 and Dec. 14, 2023. The Public Notices were posted on the County website on the same date as the first newspaper advertisements and remain posted on the internet until the forums concluded.

In the *Howard County Times*, DHCD published a Notice of the 30-day Public Comment Period and Public Hearing #3 on February 29, 2024. To more specifically reach residents impacted and/or interested in the CDBG and HOME programs, plus the new Section 108 Loan Program activities, DHCD is no longer publishing in the *Baltimore Sun*. Instead, DHCD is distributing the Public Notices to the six (6) branches of the County's public library, as well as posting the notices on the entrances to the DHCD office, which are shared with other organizations that serve the County's extremely low, low-, and moderate-income residents and households. The rationale for this change is that residents most impacted by CDBG and HOME programs who live in Howard County are more likely to read the *Howard County Times* and/or to frequent the public library.

Public Notice for the upcoming Public Hearing #4 at the meeting of the Howard County Housing and Community Development Board (April 11, 2024) and the subsequent County Council vote on funding recommendations at Hearing #5 (April 18, 2024), will post two weeks prior to these meetings. The Public Notices are posted on the County website on the same day as the first newspaper publication of the notices and remain on the internet until each public hearing concludes.

In addition to inviting input from the public, the DHCD emails invitations to an internal stakeholder list for CDBG, HOME, and County funding programs. The list includes previous grantees, applicants who were not funded, and interested stakeholders.

DHCD maintains a stakeholder contact list for the CDBG and HOME programs. All stakeholders received notification emails about the public hearings and council meetings. These emails were sent at the same time of the publishing of the first newspaper posts. Immediately following Needs Hearing #2, when DHCD reviewed CDBG and HOME programs and the amounts of funding available for specific activities, the presentation was emailed to all attendees and, upon request, to stakeholders on the internal stakeholder list.

The Draft Annual Action Plan will be displayed at the Department of Housing and Community Development's office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046 and on the County's website at <http://www.howardcountmd.gov/DHCD-Grants> from Feb. 29, 2024 through April 1, 2024.

HOME program application process, ranking and review, and in the writing of Howard County's Annual Action Plan to HUD.

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

Please reference the attached comments offered at Needs Hearing #1, where DHCD staff asked a series of questions and noted the comments from each attendee. An Excel spreadsheet captured the most pressing needs expressed by nonprofit organizational participants (included in attachments).

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

All comments and views were incorporated into this plan.

#### **7. Summary**

Under the FFY2024 CDBG Program, the County anticipates receiving a grant in the amount of \$1,310,347.00 and \$10,000.00 in Program Income for the year for a total budget of \$1,320,347.00. The County will budget \$28,242.00 for general program administration and \$110,000.00 for Fair Housing activities for a total Planning and Administration budget of \$138,242.00 (10%).

The balance of funds will be allocated to activities which principally benefit low- and moderate-income persons. The activities which principally benefit low- and moderate-income persons are divided between Public Facilities \$436,005 (33%), Housing Activities \$550,000.00 (42%), and Public Service \$196,100 (15%).

The County meets the HUD regulations for project caps by allocating the following FFY2023 CDBG funds:

- Planning and Administration \$138,242.00 or 10% allocation

- Public Services \$196,100.00 (15%)
- Demolition \$0.00 or 0.0%
- Urgent Need \$0.00 or 0.0%

Under the FFY2024 HOME Program, the County anticipates receiving a grant in the amount of \$573,996.00 and \$0.00 in program income for the year for a total FFY2024 budget of \$573,996.00. The County will use \$107,625.25 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY2024.

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

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

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	HOWARD COUNTY	Department of Housing and Community Development
HOME Administrator	HOWARD COUNTY	Department of Housing and Community Development

**Table 1 – Responsible Agencies**

**Narrative (optional)**

Howard County's Department of Housing and Community Development is the administrating agency for the CDBG and HOME programs. DHCD prepares the Five-Year Consolidated Plan, Annual Action Plans, Environmental Review Records (ERRs), the Consolidated Annual Performance Evaluation Reports (CAPER), provides monitoring, processes pay requests, contracting and oversight of the programs on a day-to-day basis.

**Consolidated Plan Public Contact Information**

**Kim Zanti, Chief of Community Planning and Grants**

Howard County Department of Housing & Community Development  
9820 Patuxent Woods Drive, Suite 224  
Columbia, MD 21046  
Phone: 410-313-6324  
Fax: 410-313-5960

Email: [kzanti@howardcountymd.gov](mailto:kzanti@howardcountymd.gov)

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

### **1. Introduction**

Howard County, in compliance with the County’s Citizen Participation Plan, will advertise and hold five (5) public hearings on the needs and goals of the County’s CDBG and HOME Programs. To date, the County has advertised and held four (4) public forums. Needs Hearing #1 (Dec. 14, 2023) and Needs Hearing #2 (Jan. 4, 2024) were advertised in the *Baltimore Sun* on Nov. 30 and Dec. 7, 2023, and The *Howard County Times* on Dec. 7 and Dec. 14, 2023. The Public Notices were posted on the County website on the same date as the first newspaper advertisements and remain posted on the internet until the forums concluded.

In the *Howard County Times*, DHCD published a Notice of the 30-day Public Comment Period and Public Hearing #3 on February 29, 2024. The County maintains a stakeholder contact list for the CDBG and HOME programs. All stakeholders received emails notifying the listees of the public hearings, meetings, and the survey. A “Draft Plan” was placed on display at the Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046 and the County’s website at <http://www.howardcountmd.gov/DHCD-Grants> from February 29, 2023 until April 1, 2023 at 11:59.9PM for review and comment. The draft plan review period was advertised in The *Howard County Times* on February 29, 2023. The advertisement was also published on the County’s website.

DHCD developed the Annual Action Plan based on the input received from stakeholders. All comments received during the needs assessment phase were considered in the CDBG and HOME program application process, ranking and review, and in the writing of Howard County’s Annual Action Plan to HUD.

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

Howard County’s Department of Housing and Community Development acts as the single point of contact to coordinate efforts between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. DHCD works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the area:

- **Howard County Department of Housing and Community Development** - oversees the County’s CDBG and HOME grant programs.
- **Howard County Housing Commission** - manages the HUD Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable, multifamily rental housing.
- **Social Services Agencies** - provides services to address the needs of low- and moderate-income persons.

- **Housing Providers** – preserves, rehabilitates and develops affordable housing for low- and moderate-income households.
- **Howard County Department of Community Resources and Services** - oversees the Continuum of Care (CoC) Network for Howard County, as well as public services utilized by low- and moderate-income households.

Collaboration and coordination with these entities will continue throughout the five-year period to capitalize on potential future funding opportunities, as well as potential project partnerships, that would result in increased benefits to low- and moderate-income households. Each year as a part of the CDBG and HOME application planning process, these stakeholders are contacted to identify the County's housing and community development needs and priorities. Stakeholders are encouraged to attend a public hearing or respond directly to consultation contacts. Stakeholders are also invited to apply for CDBG and HOME funding for eligible activities.

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

The Howard County Coalition to End Homelessness consists of twenty-three (23) members representing Howard County government, Howard County School System, non-profit agencies, the business and faith communities, citizen advocates, and individuals with lived experience. The Coalition fulfills the HUD requirement to have a planning body designed to promote a community-wide commitment to the goal of ending homelessness. The Coalition is responsible for and committed to creating and driving a system of housing and care that responds to the needs of homeless individuals and families in Howard County with the mission to make homelessness rare, brief, and non-recurring.

CDBG and HOME funds are used to financially support and leverage efforts of the Coalition, including but not limited to, supportive service programs and facilities for the homeless and persons at-risk of becoming homeless; and assistance efforts to provide emergency shelter transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities for the homeless and person at-risk of becoming homeless.

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

The Howard County Coalition to End Homelessness uses a Coordinated Entry System to address the needs of homeless persons and those at risk of homelessness. The Coordinated Entry System is designed to minimize barriers faced by individuals who are homeless in accessing the most appropriate and effective housing services to address their needs and incorporates a "housing first" philosophy in matching homeless individuals with services. The CoC uses Service

Point HMIS software for its coordinated entry system. Coordinated entry referrals prioritize all individuals and families who are the most vulnerable according to the VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Prescreen Tool), as well as those identified as meeting the HUD definition of chronically homeless.

The Coalition has four committees (Coordinated Entry, HMIS, Planning, and Rating and Ranking) that manage the administration of the CoC by determining how to allocate Emergency Solutions Grant (ESG) funds; developing performance standards and evaluate outcomes; and developing funding, policies, and procedures for the administration of HMIS. The CoC reviews projects funded by the Continuum of Care, EGS and other related activities for compliance, application, and performance and makes recommendations on the allocation of resources to projects. The Coalition ensures that there is a comprehensive and fair resource allocation process, as well as an effective system for addressing and monitoring the needs of people experiencing homelessness or who are at risk of becoming homeless.

The County's Department of Housing and Community Development is an active member of the Coalition and utilizes information from the Coalition to fund CDBG and HOME projects that address homelessness.

**2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities.**

AP-10

Table 2 – Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	Howard County Housing Commission
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Howard County Housing Commission was consulted to obtain information on the County's housing and community development needs.
2	<b>Agency/Group/Organization</b>	Howard County Department of Community Resources and Services
	<b>Agency/Group/Organization Type</b>	Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Howard County Department of Community Resources and Services was consulted to obtain information on the County's housing and community development needs.
3	<b>Agency/Group/Organization</b>	Maryland Department of Environment
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Maryland Department of the Environment was consulted to obtain information on the County's housing and community development needs.
4	<b>Agency/Group/Organization</b>	Association Of Community Services Of Howard County (ACS)
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Association of Community Services of Howard County was consulted to obtain information on the County's housing and community development needs.

5	<b>Agency/Group/Organization</b>	Bridges to Housing Stability, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-homeless Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bridges to Housing Stability was consulted to obtain information on the County's housing and community development needs.
6	<b>Agency/Group/Organization</b>	COMMUNITY ACTION COUNCIL OF HOWARD COUNTY, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Community Action Council of Howard County was consulted to obtain information on the County's housing and community development needs.
7	<b>Agency/Group/Organization</b>	Grassroots Crisis Intervention Center, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Grassroots Crisis Intervention was consulted to obtain information on the County's housing and community development needs.

8	<b>Agency/Group/Organization</b>	Heritage Housing Partners Corp.
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Heritage Housing Partners Corp. was consulted to obtain information on the County's housing and community development needs.
9	<b>Agency/Group/Organization</b>	Howard County Department of Social Services
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Howard County Department of Social Services was consulted to obtain information on the County's housing and community development needs.
10	<b>Agency/Group/Organization</b>	HUMANIM, INC.
	<b>Agency/Group/Organization Type</b>	Housing – Persons with Disabilities Services-Persons with Disabilities Services-Health Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Humanim was consulted to obtain information on the County's housing and community development needs.
11	<b>Agency/Group/Organization</b>	CHESAPEAKE NEIGHBORS, LLC
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Chesapeake Neighbors was consulted to obtain information on the County's housing and community development needs.
12	<b>Agency/Group/Organization</b>	Living in Recovery
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Living in Recovery was consulted to obtain information on the County's housing and community development needs.
13	<b>Agency/Group/Organization</b>	Rebuilding Together Howard County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Rebuilding Together Howard County was consulted to obtain information on the County's housing and community development needs.
14	<b>Agency/Group/Organization</b>	Howard County Department of Corrections
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Howard County Department of Corrections was consulted to obtain information on the County's housing and community development needs.

15	<b>Agency/Group/Organization</b>	The Arc of Howard County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Arc of Howard County was consulted to obtain information on the County's housing and community development needs.
16	<b>Agency/Group/Organization</b>	Hope Works of Howard County
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	We Are Hope Works of Howard County was consulted to obtain information on the County's housing and community development needs.
17	<b>Agency/Group/Organization</b>	Howard County Health Department
	<b>Agency/Group/Organization Type</b>	Health Agency

	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Howard County Health Department was consulted to obtain information on the County's housing and community development needs.
18	<b>Agency/Group/Organization</b>	Making Change, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Making Change was consulted to obtain information on the County's housing and community development needs.
19	<b>Agency/Group/Organization</b>	Luminus Network, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Luminus Network was consulted to obtain information on the County's housing and community development needs.
20	<b>Agency/Group/Organization</b>	Columbia Housing Center
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Columbia Housing Center was consulted to obtain information on the County's housing and community development needs.
21	<b>Agency/Group/Organization</b>	Laurel Advocacy and Referral Services
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Laurel Advocacy and Referral Services was consulted to obtain information on the County's housing and community development needs.
22	<b>Agency/Group/Organization</b>	Howard County Office of Workforce Development
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Howard County Office of Workforce Development was consulted on the County's housing and community development needs.

23	<b>Agency/Group/Organization</b>	United Way of Central Maryland
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The United Way of Central Maryland was consulted to obtain information on the County's housing and community development needs.
24	<b>Agency/Group/Organization</b>	Maryland Legal Aid
	<b>Agency/Group/Organization Type</b>	Services - Housing Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Maryland Legal Aid was consulted to obtain information on the County's housing and community development needs.
25	<b>Agency/Group/Organization</b>	Accessible Resources for Independence
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Accessible Resources for Independence was consulted to obtain information on the County's housing and community development needs.

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

All agencies were consulted.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Howard County Coalition to End Homelessness	The Path Home, Howard County's Strategic Plan to End Homelessness, Five-Year Plan 2020 to 2025. The CoC is the primary provider of housing and supportive services for the area's homeless and those at risk of becoming homeless. The goals of the County and the CoC are complementary.
Five Year Annual Action Plan	Howard County Housing Commission	The Howard County Housing Commission is the lead agency providing housing choice vouchers and affordable rental housing in the County. The goals of the County and Howard County Housing Commission are complementary.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Howard County General Plan	Howard County Planning & Zoning	Howard County Plan Howard 2030 is an update of the 2000 Howard County General Plan and was developed for guiding decisions related to development, land preservation, changing demographic and employment trends, neighborhood sustainability, capital projects, County services and other key issues. The goals of the County's Consolidated Plan and Plan Howard 2030 are complementary.
Regional Analysis of Impediments	Baltimore Metropolitan Council (BMC)	Howard County is a participating member in the Baltimore Metropolitan Council's Regional Analysis of Impediments to Fair Housing Choice. The goals of the County's Consolidated Plan and the AI are complementary.

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

## AP-12 Participation – 91.105, 91.200(c)

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

Howard County, in compliance with the Citizen Participation Plan, has advertised three (3) of five (5) public hearings on the needs and goals of the community in relation to the CDBG and HOME Programs and to inform and educate community members and nonprofit providers of each program’s purpose and how these connect to national objectives and eligible activities.

Howard County, in compliance with the County’s Citizen Participation Plan, will advertise and hold five (5) public hearings on the needs and goals of the County's CDBG and HOME Programs. To date, the County has advertised and held four (4) public forums. Needs Hearing #1 (Dec. 14, 2023) and Needs Hearing #2 (Jan. 4, 2024) were advertised in the *Baltimore Sun* on Nov. 30 and Dec. 7, 2023, and The *Howard County Times* on Dec. 7 and Dec. 14, 2023. The Public Notices were posted on the County website on the same date as the first newspaper advertisements and remain posted on the internet until the forums concluded.

In the *Howard County Times*, the Department published a Notice of the 30-day Public Comment Period and Public Hearing #3 on February 29, 2024. The County maintains a stakeholder contact list for the CDBG and HOME programs. All stakeholders received emails notifying the listees of the public hearings, meetings, and the survey. A “Draft Plan” was placed on display at the Department of Housing and Community Development’s office, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046 and the County’s website at <http://www.howardcountmd.gov/DHCD-Grants> from February 29, 2024, until April 1, 2024 at 11:59.9PM for review and comment. The draft plan review period was advertised in The Howard County Times. Public Notices were posted in six branches of the Howard County Library on February 29, 2024, and the draft plan was posted on the County website.

DHCD developed the Annual Action Plan based on the input received from stakeholders. All comments and surveys received during our needs assessment phase were considered in our CDBG and HOME program application process, ranking and review, and in the writing of Howard County’s Annual Action Plan to HUD.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments <i>not</i> accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Needs Hearing # 1 on December 14, 2023. 28 non-profit agency reps attended.	All comments can be found in the Citizens Participation Backup.	N/A	
2	Public Hearing	Non-targeted/broad community	Public Hearing # 2 on January 4, 2024. 21 non-profit agency reps attended.	All comments can be found in the Citizens Participation Backup.	N/A	
3	Public Meeting	Non-targeted/broad community	Public Meeting # 3 on March 18, 2024.	All comments can be found in the Citizen Participation Backup.	N/A	
4	Public Hearing	Non-targeted/broad community	Public Hearing # 4 on April 11, 2024.	All comments can be found in the Citizens Participation Backup.	N/A	
5	Public Hearing	Non-targeted/broad community	Public Hearing # 5 on, April 18, 2024.	All comments can be found in the Citizen Participation Backup.	N/A	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Howard County completed the planning and writing of the FFY2024 Annual Action using estimated amounts that the County received in FFY2023 for both CDBG and HOME programs. The County anticipates receiving \$1,310,347 in CDBG and \$573,996 in HOME funds for the FFY2024 program year. To maintain compliance with requirements and timing for submission of the Annual Action Plan to HUD, the County chose to move forward with the planning, writing, and 30-day public comment period with the anticipated amounts for these programs.

The County's FFY2024 CDBG and HOME program year starts on July 1, 2024 and concludes on June 30, 2025. The County projects its CDBG and HOME allocations to remain level for the remaining year of the five -year period.

In the event the FFY2024 CDBG and HOME Program awards vary from the FFY2023 award, Howard County intends to adjust the

amounts equally among the CDBG and the HOME projects.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,310,347	10,000	0	1,320,347	0	The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons. The County anticipates funding eleven (11) CDBG projects in FFY2024.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	573,996	0	0	573,996	0	The HOME entitlement program allocates annual grants to larger cities and urban counties to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-and moderate-income people. The County anticipates funding five (5) HOME projects in FFY2024.

**Table 5 - Expected Resources – Priority Table**

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

For the sixth year, the County’s MIHU Fee-In-Lieu Program, (\$1,194,050) will further support the goals set within this FFY2024 Annual Action Plan. A proposed combined budget of \$6,110,000 for the Housing Initiative Program within the DHCD’s Community Renewal Fund has been requested for County Fiscal Year 2025. The County will use \$107,625.25 for the 25% match contributions from the County’s Banked Match from prior projects as HOME match for FFY2024.

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

The following publicly owned lands and properties within the jurisdiction are available for future development to address the needs identified in the Plan:

- West Watersville Road, Mt. Airy (Tax ID 04-333217)
- Southeast side of Beetz Road, Mt. Airy (Tax ID 04-333195)
- 589 Woodbine Road, Woodbine (Tax ID 04-313089)
- Woodbine Road, Woodbine (Tax ID 04-374355)
- Route 40 at Pine Orchard, Ellicott City (Tax ID 02-258714)
- 3420 Martha Bush Drive, Ellicott City (Tax ID 02-218488)
- Rogers Avenue, Ellicott City (Tax ID 02-265729)
- Adjacent to MD Route 100, Ellicott City (Tax ID 01-291483)
- 12201 Hall Shop Road, Clarksville (Tax ID 03-351995)
- Mayfield Avenue, Elkridge (Tax ID 01-159496)
- 9770 and 9790 Washington Boulevard, Laurel (Tax ID 06-407846)

### **Discussion**

The County's CDBG and HOME program year runs from July 1, 2024, through June 30, 2025. These funds will be used to address the following priority needs set within the FFY2020 to FFY2024 Consolidated Plan:

- Housing
- Homeless
- Other Special Needs
- Community Development
- Administration, Planning, and Management

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HS-1 Housing Support	2020	2024	Affordable Housing	Howard County Target Area	Housing Priority	CDBG: \$473,731 HOME: \$160,000	Rental units rehabilitated: 3 Household Housing Unit Direct Financial Assistance to Homebuyers: 4 Households Assisted
2	HS-3 Housing Rehabilitation	2020	2024	Affordable Housing	Howard County Target Area	Housing Priority	CDBG: \$215,014	Rental units rehabilitated: 6 Household Housing Unit Homeowner Housing Rehabilitated: 20 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	HO-1 Housing	2020	2024	Homeless	Howard County Target Area	Homeless Priority	HOME: \$80,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1 Households Assisted
4	HO-2 Operation/Support	2020	2024	Homeless	Howard County Target Area	Homeless Priority	CDBG: \$150,236	Public service activities for Low/Moderate Income Housing Benefit: 103 Households Assisted
5	SN-1 Housing	2020	2024	Non-Homeless Special Needs		Other Special Needs Priority	CDBG: \$24,000	Homeless Person Overnight Shelter: 50 Persons Assisted
6	SN-2 Social Services	2020	2024	Non-Homeless Special Needs	Howard County Target Area		CDBG: \$38,858	Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted
7	CD-1 Community Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Howard County Target Area	Community Development Priority	CDBG: \$412,085	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 558 Persons Assisted
8	AM-1 Overall Coordination	2020	2024	Administration, Planning, and Management	Howard County Target Area	Administration, Planning, and Management Priority	CDBG: \$278,798 HOME: \$48,526	Other: 4 Other

**Table 6 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	HS-1 Housing Support
	<b>Goal Description</b>	Assist low-and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling and down payment/closing cost assistance.
2	<b>Goal Name</b>	HS-3 Housing Rehabilitation
	<b>Goal Description</b>	Preserve and rehabilitate affordable housing units occupied by owners and renters by addressing code violations, emergency repairs and handicap accessibility.
3	<b>Goal Name</b>	HO-1 Housing
	<b>Goal Description</b>	Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
4	<b>Goal Name</b>	HO-2 Operation/Support
	<b>Goal Description</b>	Support social services programs and facilities for the homeless and persons at-risk of becoming homeless.
5	<b>Goal Name</b>	SN-1 Housing
	<b>Goal Description</b>	Support an increase in the supply of descent, safe and sanitary housing that is affordable and accessible for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation and new construction of housing units.

6	<b>Goal Name</b>	SN-2 Social Services
	<b>Goal Description</b>	Support social services and programs and the facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
7	<b>Goal Name</b>	CD-1 Community Facilities and Infrastructure
	<b>Goal Description</b>	Improve the County's public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
8	<b>Goal Name</b>	AM-1 Overall Coordination
	<b>Goal Description</b>	Provide program management and oversight, for the successful administration of federal, state, and local funded program, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

In order to address the identifiable needs of Howard County, the proposed FFY 2021 One-Year Action Plan proposes the following activities:

#### Projects

#	Project Name
1	CDBG Program Planning and Administration
2	Fair Housing Regional AI Coordinator
4	Columbia Housing Center Affirmative Marketing Program
5	Roger Carter Recreation Center Redevelopment
6	Emergency Public Facility
7	Rebuilding Together - Homeowner Rehab
8	Community Action Council - Housing Stability
9	Grassroots Shelter Program
10	Hope Works of Howard County - Transitional Housing
11	The Arc of Howard County- Rehab
12	Enterprise- Waverly Winds- Section 108
13	Enterprise- Ranleigh Court- Section 108
14	HOME Program Planning and Administration
15	Down Payment Assistance
16	iHomes - Acquisition
17	CHDO Set Aside Project

#### Table 7 - Project Information

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

The allocations and priorities were established through discussions with County decision makers, meetings with stakeholders, and public meetings. The largest obstacle to addressing the County's underserved needs are financial in nature. There is a need for additional federal, state, and local funding to undertake additional housing and community development projects.

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

<b>1</b>	<b>Project Name</b>	CDBG Program Planning and Administration
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	AM-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Priority
	<b>Funding</b>	CDBG: \$18,242
	<b>Description</b>	Howard County will use CDBG funds towards the administration of the CDBG program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. The staff member is responsible for performing program related duties, such as financial, environmental, and program eligibility according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with the funding agency, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, preparing and submitting performance reports.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - Planning
	<b>Location Description</b>	Howard County Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046
	<b>Planned Activities</b>	Matrix Code: 21A General Program Administration
<b>2</b>	<b>Project Name</b>	Fair Housing Regional AI Coordinator
	<b>Target Area</b>	Howard County Target Area

	<b>Goals Supported</b>	AM-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Priority
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	Howard County along with Baltimore City, Anne Arundel, Baltimore, and Harford County fund a portion of the salary for a Regional AI Coordinator. Howard County, in cooperation with these jurisdictions, contracted with a consultant to complete a regional and jurisdiction specific Analysis of Impediments to Fair Housing (AI) which was formally accepted in April 2020. The AI Coordinator works to guide the implementation of the regional initiatives to address identified potential impediments to Fair Housing Choice. This activity is funded out of the 20% Administration cap for FFY22.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A Planning
	<b>Location Description</b>	Baltimore Metropolitan Council, Baltimore MD
	<b>Planned Activities</b>	Matrix Code: 21A General Program Administration
<b>3</b>	<b>Project Name</b>	Columbia Housing Center Affirmative Marketing Program
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	AM-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Priority
	<b>Funding</b>	CDBG: \$110,000

	<b>Description</b>	The Columbia Housing Center, a 501 (c)(3) nonprofit organization, in response to new residential segregation patterns that are forming in parts of Columbia, will use CDBG funding to create a program based on the successful Oak Park Regional Housing Center. This project will help landlords find tenants and tenants finds homes while promoting racial integration. This effort helps Howard County carry out our duty to affirmatively further fair under the federal Fair Housing Act. This activity is funded out of the 20% Administration cap.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A Planning
	<b>Location Description</b>	Howard County, MD
	<b>Planned Activities</b>	Matrix Code 21A General Program Administration
4	<b>Project Name</b>	Roger Carter Recreation Center Redevelopment
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	CD-1 Community Facilities and Infrastructure
	<b>Needs Addressed</b>	Community Development Priority
	<b>Funding</b>	CDBG: \$196,984
	<b>Description</b>	The Howard County Housing Commission, a public body corporate and politic, and a Howard County Housing and Community Development Organization, invests annual CDBG funds under an approved pre-award strategy for this project. The Roger Carter Recreation Center Re-development is a key vehicle for neighborhood revitalization. This activity will benefit the residents of Burgess Mill Station and surrounding Ellicott City area in the community located on Burgess Mill Way, Ellicott City, MD 21043.
	<b>Target Date</b>	6/1/2043

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity is anticipated to benefit approximately 500 low- to moderate-income Howard County residents.
	<b>Planned Activities</b>	Low-Mod Clientele - LMC - 570.208(a)(2)
	<b>Location Description</b>	
5	<b>Project Name</b>	Emergency Public Facility
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	SN-1 Housing
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG: \$24,000
	<b>Description</b>	The Howard County Housing Commission, a public body corporate and politic, and a Howard County Housing and Community Development Organization, invests annual CDBG funds under an approved pre-award strategy for this project. This activity will allocate funds to support the property acquired by long-term leasing of a public facility being utilized as a provision of emergency housing. This activity ensures the safety of Howard County residents who are struggling with domestic abuse. Eligibility requirement: Howard County residents fleeing domestic violence situations.
	<b>Target Date</b>	06/30/25
	<b>Estimate the number and type of families that will benefit from the proposed activities.</b>	Eligibility requirement: Howard County residents fleeing domestic violence situations. This Project will serve approximately <b>50</b> Howard County residents in FFY24.
	<b>Location Description</b>	Confidential Location
	<b>Planned Activities</b>	Low-Mod Housing - LMH - 570.208(a)(3)
<b>Project Name</b>	Rebuilding Together - Homeowner Rehab	
<b>Target Area</b>	Howard County Target Area	

6	<b>Goals Supported</b>	HS-3 Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Priority
	<b>Target Date</b>	
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Rebuilding Together, Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide free home repairs to Howard County low- to moderate-income homeowners to preserve the stock of safe, affordable single-family homes in Howard County. Rebuilding Together clients include veterans, people with disabilities, families with small children and the elderly.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities.</b>	Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore-Columbia -Towson Metropolitan Statistical Area (MSA) adjusted by family size, as established by HUD.  This Project will serve approximately <b>20</b> households in Howard County in FFY24.  Eligible Activity: Rehabilitation
	<b>Location Description</b>	To be determined: Howard County Target Area
	<b>Planned Activities</b>	Eligibility requirement: Rehabilitation of existing dwelling units
7	<b>Project Name</b>	<b>Community Action Council - Housing Stability</b>
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	HO-2 Operation/Support
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG: \$109,500

	<b>Description</b>	The Community Action Council of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide housing stability for low- and moderate-income Howard County residents through eviction prevention . Direct payment to landlords will be made based on an eviction judgment.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Income eligibility: Howard County residents between 0% - 80% Area Median Income for the Baltimore-Columbia -Towson Metropolitan Statistical Area (MSA) adjusted by family size, as established by HUD.  Eligibility requirement: Direct payments based on eviction judgement/proceedings.  This Project will serve approximately <b>63</b> households in Howard County in FFY24.
	<b>Location Description</b>	Howard County
	<b>Planned Activities</b>	Public Service Low Mod Clientele - LMC - 570.208(a)(2)
8		
	<b>Project Name</b>	Grassroots Crisis Intervention Center, Inc.
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	HO-2 Operation/Support
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	\$50,000

	<b>Description</b>	Grassroots Crisis Intervention Center, Inc. (Grassroots), a 501 (c)(3) nonprofit, will use CDBG funds for utility expenses associated with their Crisis Intervention Center / Homeless Shelter location. This public facility is a multi-service crisis intervention center providing 24-hour crisis intervention services, emergency and transitional shelter, and community education. Grassroots operates a 24-hour general crisis hotline and walk-in counseling program and is the first point of contact in the County for homeless services. The agency operates the Mobile Crisis Team, in partnership with Humanim, to respond with the Police to psychiatric emergencies and family crises in the community. Special youth services include the Maryland Crisis Hotline, the Runaway Intervention Program, outreach, and educational programs. Staff also respond to requests from the community for crisis intervention services following a traumatic event. The Crisis Intervention Service is certified by the American Association of Suicidology.
	<b>Target Date</b>	6/30/25
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This Project will serve approximately <b>40</b> Howard County households in FFY24. Eligible Activity: Public Service
	<b>Location Description</b>	Howard County
	<b>Planned Activities</b>	Public: Service: Low-Mod Clientele - LMC - 570.208(a)(2)
9	<b>Project Name</b>	Hope Works of Howard County
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	SN-2 Social Services
	<b>Needs Addressed</b>	Other Special Needs Priority
	<b>Funding</b>	CDBG: \$36,600

<b>Planned Activities</b>	Eligibility requirement: Howard County residents fleeing domestic violence situations. This Project will serve approximately <b>40</b> households in Howard County in FFY24.
<b>Description</b>	Hope Works of Howard County, Inc., a 501 (c)(3) nonprofit, will use CDBG funding to provide partial salary and fridge for the Transitional Housing Program Case Manager and partial utility payments for their transitional houses to operate their program. The Transitional Housing Program provides housing to Howard County residents that are made homeless due to sexual and intimate partner violence and allows victims to be housed for up to one (1) year. Clients have access to all Hope Works services such as legal advocacy/representation, clinical counseling and case management. Referrals for employment training, education and other community services are also available. Hope Works is the sole provider of comprehensive domestic violence and rape crisis and recovery services in Howard County. Specifically, Hope Works is the only residential program in the county that has the experience, expertise and internal capacity necessary to address the multiple, interlocking needs of domestic violence victims, and their families.
<b>Target Date</b>	6/30/25
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eligibility requirement: Howard County residents fleeing domestic violence or intimate partner violence situations. This Project will serve approximately 40 households in Howard County in FFY2024.
<b>Location Description</b>	Howard County
<b>Planned Activities</b>	Low-Mod Clientele – LMC – 570.208 (a)(2)
<b>Project Name</b>	The Arc of Howard County
<b>Target Area</b>	Howard County Target Area
<b>Goals Supported</b>	HS-3 Housing Rehabilitation
<b>Needs Addressed</b>	Other Special Needs Priority

	<b>Funding</b>	CDBG: \$215,021
	<b>Description</b>	The Arc of Howard County will use CDBG funds for renovations to six (6) housing units that provide safe, healthy, and affordable housing for vulnerable County residents with intellectual and/or developmental disabilities (I/DD) who income-qualify.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately sixteen (16) residents with I/DD in six (6) residential houses, 200 individuals with I/DD supported by a variety of day programs, and a staff of 70 working throughout the six sites in rotating shifts around the clock.
	<b>Location Description</b>	Various, Howard County
	<b>Planned Activities</b>	Eligibility requirement: Rehabilitation of existing dwelling units
10	<b>Project Name</b>	Enterprise- Waverly Winds
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	ED-2 Redevelopment
	<b>Needs Addressed</b>	Community Development: CD-1 Housing Need: HS2, Other Special Needs, SN-1
	<b>Funding</b>	CDBG: \$175,000 – Section 108 Loan
	<b>Description</b>	Waverly Winds is a “twin” project consisting of two separately financed components. One building, with 55 units (including 28 HAP-assisted units), will be financed primarily with 9% LIHTC equity and is referred to herein as the “9% Project.” The second building, with 68 units (including 14 HAP-assisted units), will be financed primarily with 4% equity and soft debt from the State of Maryland DHCD, Community Homes Housing Inc., and Howard County.
	<b>Target Date</b>	6/30/2046

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	43 of 123 units will be Low-Mod Housing Below 60% AMI
	<b>Location Description</b>	Howard County
	<b>Planned Activities</b>	Low-Mod Housing – LMH – 570.208 (a) (3)
11		
	<b>Project Name</b>	Enterprise- Ranleigh Court
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	ED-2 Redevelopment
	<b>Needs Addressed</b>	Community Development: CD-1 Housing Need: HS2, Other Special Needs, SN-1
	<b>Funding</b>	CDBG: \$175,000- Section 108 Loan
	<b>Location Description</b>	Ranleigh Court currently consists of 41 apartment units. The community is proposed to be redeveloped by replacing the existing structures with a new 82-unit multifamily building with new amenity spaces and onsite leasing office. The new community will preserve all existing affordability and add new workforce and market rate units.
	<b>Target Date</b>	6/30/2046
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	46 of 82 units will be Low Mod Housing for under 50% AMI
	<b>Planned Activities</b>	Low-Mod Housing - LMH - 570.208(a)(3)
12	<b>Project Name</b>	HOME Program Planning and Administration
	<b>Target Area</b>	Howard County
	<b>Goals Supported</b>	AM-1 Overall Coordination

	<b>Needs Addressed</b>	Administration, Planning, and Management Priority
	<b>Funding</b>	HOME: \$57,399.60
	<b>Description</b>	Howard County will use HOME funds towards the administration of the HOME program. Activities performed by County staff ensure that all aspects of the program requirements are met as the grant is being administered. Staff members are responsible for performing program related duties, such as financial, environmental, and program eligibility review according to the grant award terms and conditions. Relevant duties include, but are not limited to, working with project partners and developing partnerships, developing a working relationship with funding agencies, developing a project work plan, documenting project activities, overseeing grant procurement activities, supervising progress of the project, managing the project budget, tracking match, monitoring program rents and incomes and preparing and submitting performance reports. Howard County HOME program during the FFY24 program year.
	<b>Target Date</b>	6/30/25
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Department of Housing and Community Development, 9820 Patuxent Woods Drive, Suite 224, Columbia, MD 21046
	<b>Planned Activities</b>	Program Planning and Administration

15	<b>Project Name</b>	Down Payment Assistance
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	HS-1 Housing Support
	<b>Needs Addressed</b>	Housing Priority
	<b>Funding</b>	HOME: \$160,000

<b>Description</b>	The Department of Housing and Community Development will provide down payment and /or closing cost assistance to eligible homebuyers for the purchase of one dwelling unit in Howard County. Howard County is a fair housing lender. The Fair Housing Act (FHA) makes it illegal to discriminate against someone because of race, color, religion, sex, familial status, national origin, or disability at any stage of the mortgage process. The FHA prohibits discrimination in loans that are secured by residential real estate or that are for the purchasing, constructing, improving, repairing, or maintaining a dwelling. This includes mortgages, refinancing, home equity loans and home improvement loans. Howard County intends to use the HUD Homeownership Affordability Value Limits (95% of median area purchase price).
<b>Target Date</b>	6/30/2025
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Income eligibility: Howard County residents that earn between zero and <b><u>eighty percent</u></b> . The project will <b>create 4 units</b> of affordable housing in FFY25.
<b>Location Description</b>	To be determined.
<b>Planned Activities</b>	Eligibility requirement: Homebuyer activity.

<b>16</b>	<b>Project Name</b>	iHomes
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	HS-1 Housing Support
	<b>Needs Addressed</b>	Housing Priority; Other Special Needs Priority
	<b>Funding</b>	HOME: \$225,000
	<b>Description</b>	iHomes is a part of the Howard County Continuum of Care system and a private, non-profit Community Housing Development Organization (CHDO).
	<b>Target Date</b>	6/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Housing for 2 residents with disabilities and/or special needs with incomes below 30% AMI
	<b>Location Description</b>	Howard County
	<b>Planned Activities</b>	Acquire 2 housing units to serve the housing needs of residents with disabilities and/or special needs

<b>17</b>	<b>Project Name</b>	CHDO Set Aside Project
	<b>Target Area</b>	Howard County Target Area
	<b>Goals Supported</b>	HS-1 Housing Support
	<b>Needs Addressed</b>	Housing Priority
	<b>Funding</b>	HOME: \$86,099.40
	<b>Description</b>	CHDO set-aside finds may be used for projects that are owned, developed, or sponsored by a nonprofit that qualifies as a CHDO as defined at 24 CFR 92.2. Previously, these roles were limited to development activities that is, projects that involved acquisition, rehabilitation, and/or new construction of housing for sale or rent to low-income families. However, the 2013 HOME Final Rule amended the definitions of these roles and now nonprofits can also own and manage HOME-assisted housing that it does not develop
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<u>Anticipated Income eligibility:</u> Howard County residents with severe disabilities that earn between zero and <b>sixty percent</b> . <u>Anticipated Eligibility requirement:</u> Creation of <b>1 unit</b> of affordable housing.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	<u>Anticipated Eligibility requirement:</u> Creation of <b>1 unit</b> of affordable housing.



## **AP-50 Geographic Distribution – 91.220(f)**

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

#### **Introduction**

Howard County will direct CDBG and HOME funds countywide. It is the policy of Howard County that activities will not be qualified based on service area benefit. On June 4, 2014, Howard County passed Bill No. 18-2014, an Act amending the Rehabilitation Loan Program to allow loans for renovations and expansions; amending the moderate income housing unit provisions to prohibit certain alternatives in certain areas; requiring the use of fee in lieu funds for homeownership opportunities in certain areas; prohibiting the Department of Housing and Community Development and the Housing Commission from participating in certain housing projects; and generally related to moderate income housing units and the Rehabilitation Loan Program in Howard County. Specific to CDBG and HOME funds, the Bill restricted the use of County funding for the construction of housing in Census Tracts and Block Groups if the poverty level is 10% or greater. The purpose of the Bill was to address concentration of subsidized housing and to encourage future affordable housing development outside of areas of concentration thus affirmatively furthering fair housing.

#### **Rationale**

The County has allocated FFY2024 CDBG and HOME Program funds for activities that will principally benefit low- and moderate-income persons.

The Public Facilities activities serve a low- and moderate-income clientele or presumed benefit.

The Housing activities have an income eligibility criterion, restricting funds to low- and moderate-income households throughout the County.

The Public Service activities serve a low- and moderate-income clientele or presumed beneficiaries.

Fair Housing Activities will be paid using remaining FFY2022 Funds.

#### **Discussion**

In FFY2024, The County expects receipt of a CDBG grant in the amount of \$1,310,347.00 and anticipates \$10,000.00 in Program Income for a total of \$1,321,347.00. From these funds, the County will budget \$138,242.00 (20%) for general program administration. Fair Housing activities will be paid for using available prior year funds. Funding will be allocated to activities which principally benefit low- and moderate-income persons in the amount of \$1,310,347.00 (100.0%) and \$0.00 for the removal of slums and blight (0.0%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities

\$436,005.00 (33%), Housing activities \$550,000.00 as part of Section 108 Loan Guarantee funds (42%), and Public Service activities \$196,100.00 (15%).

Under the FFY2024 HOME Program, the County expects to receive a grant in the amount of \$573,996.00 and anticipates \$0.00 in program income for the year for a total FFY2024 budget of \$573,996.00. From these funds, the County will budget \$57,399.00 (10%) for general program administration. The County will use \$107,625.25 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY2024.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Howard County will use its CDBG and HOME funds to address the County's affordable housing needs through the continuation of production of new housing units, rehabilitation of existing housing units, and acquisition of existing housing units.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	175
Non-Homeless	51
Special-Needs	16
Total	242

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through These Activities</b>	
Rental Assistance	41
The Production of New Units	205
Rehab of Existing Units	153
Acquisition of Existing Units	10
Total	409

**Table 9 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Howard County will utilize its CDBG and HOME funds to complete the following affordable housing goals during FFY 2024:

- Rehab thirty-six (36) existing affordable housing units - incomes below 80% AMI;
- Acquire two (2) existing units to provide affordable family housing for households below 60% AMI,
- Acquire four (4) existing affordable housing units with Downpayment Assistance – incomes below 80% AMI, and
- Provide rental assistance to 81 households, preventing homelessness.
- Provide safe sheltering, through emergency and transition shelters for 75 households experiencing homelessness.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Howard County has identified that there is a need for decent, safe, and sanitary housing that is affordable and accessible to households affected by housing problems, severe housing problems, and housing cost burdens. The largest income group affected by housing problems in the County are extremely low-income households. The Howard County Housing Commission is a vital part of the County's affordable housing strategy. The Housing Commission is the primary assisted housing provider of housing for extremely low income, very low income, and low-income residents of Howard County. Howard County no longer operates a Public Housing Program due to its conversion of 50 Public Housing Units to RAD Vouchers. While the units are still owned by the Housing Commission, tenants are free to take their tenant-based vouchers and relocate to any other area of opportunity that meets their individual needs.

### **Actions planned over the next year to address the needs for public housing**

The Housing Commission has developed partnerships with Bridges to Housing Stability, the Howard County Department of Corrections, and the Howard County Health Department to provide housing and supportive services for individuals with disabilities, homeless individuals, and returning citizens.

The Housing Commission will continue its participation in the Baltimore Regional Project-Based Voucher (PBV) Program that is designed to encourage new, quality, affordable rental housing in the metropolitan Baltimore area, particularly in safe neighborhoods with high quality public schools that are close to job growth. In 2019, the Housing Commission was awarded twenty (20) project-based vouchers for the Artist Flats complex at the new Cultural Center. In 2023, the Housing Commission was awarded 33 project-based vouchers for Orchard Meadows in Ellicott City.

The Commission and its partners received 9% Low Income Housing Tax Credits and other state funds for two developments in 2019:

- Artist Flats - the new construction of 174 mixed-income units, including 87 affordable housing units, as part of the new Howard County Cultural Arts Center. Closing is set for Summer, 2024.
- Ellicott Gardens II - construction of 70 affordable units adjacent to the Commission's Ellicott Gardens I development was completed in 2023 and is 100% occupied.

The Housing Commission is continuing to pursue funding for a multi-year demonstration project that would enable participants in the Housing Choice Voucher Program (HCVP) to relocate to neighborhoods with less poverty. The proposed voucher de-concentration plan would enable disadvantaged families to benefit from the opportunities that come with living in surroundings that are more economically diverse; at-risk neighborhoods to benefit from an infusion of families that have more moderate ranges of income lessening the concentration poverty and

stabilizing property values; stabilize neighborhoods; and support more racially and economically mixed neighborhoods.

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

The Howard County Housing Commission operates a Housing Choice Voucher for Homeownership Program. Program eligibility requirements are:

- Families participating in the Section 8 Homeownership Program must be in good standing, and must have participated in the Section 8 Program, or other Howard County or Housing Commission programs for at least 2 years prior to execution of the Contract of Sale. The family must also have participated in the Family Self Sufficiency Program for a period of at least 6 months prior to the date of settlement.
- The minimum income required for program participation is \$24,000. If the family meets the HUD minimum income requirements of the Federal Minimum hourly wage rate multiplied by 2,000 hours and has been pre-qualified for financing with a lending institution which meets the requirements of Section 25.7 of this plan, they are exempted from the \$24,000 minimum income requirement.
- Welfare assistance shall not be counted towards the \$24,000 minimum income requirement unless the head of household is elderly or disabled, as defined in the Administrative Plan.
- Eligible families must demonstrate that at least one adult member of the family who will own the home at commencement of homeownership is currently employed at least 30 hours per week and has been continuously employed for at least one year prior to commencement of homeownership. This requirement does not apply for families where the head of household is elderly or disabled.
- To qualify for participation in the Section 8 Homeownership Program, the family must qualify as a "first-time homeowner." A first-time homeowner is defined as a family of which no member owned or presently has any ownership interest in a unit during the three years before commencement of homeownership. A first-time homeowner also includes a single parent or displaced homemaker who while married, owned a home with his or her spouse, or resided in a home owned by his or her spouse.
- Eligible families shall not include any family with a member who has previously received assistance under the homeownership option and has defaulted on a mortgage securing debt incurred to purchase the home.
- Prior to commencement of homeownership assistance, the family must attend and satisfactorily complete pre-assistance homeownership counseling with a HUD approved counseling agency, or an equivalent program of counseling activities as designated by the Commission.

The Howard County Housing Commission operates a Family Self-Sufficiency Program. The Commission does not limit participation in the program if demand exceeds the HUD required size limit.

**Discussion**

Howard County has identified that there is a need for decent, safe, and sanitary housing that is affordable and accessible to households affected by housing problems, severe housing problems, and housing cost burdens. The largest income group affected by housing problems in the County are extremely low-income households. The Howard County Housing Commission is a vital part of the County's affordable housing strategy. The Housing Commission is the primary assisted housing provider of housing for extremely low income, very low income, and low-income residents of Howard County.

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

### **Introduction**

The Coordinated System of Homeless Services (CSHS) is a network of community services and supports designed to end homelessness in Howard County. CSHS is comprised of 23 members which offer resources to households in need, to prevent loss of stable housing or regain housing that has been lost. Financial assistance is available through multiple community partners. Households needing additional resources may contact the system's Single Point of Entry for assessment and connection to varying levels of support.

Intensive Case Management services assist households to identify and address barriers to housing stability, connect to resources and ongoing supports, and identify appropriate and affordable housing. CSHS also directly includes employment services, addiction and trauma treatment, and support for domestic violence survivors. Reentry services and supports for school-age children through Howard County's Public School System are also available.

A Housing Specialist provides expertise to locate housing for individuals and families whose past rental history is a barrier to securing new housing. The Housing Connections Program provides protection to landlords who rent to these households. Flexible Financial Assistance is available to help with security deposits, rent, and other items that support housing stability plans.

### **CSHS Partners:**

- Bridges to Housing Stability
- Community Action Council
- Springboard Community Services
- Grassroots Crisis Intervention Center
- Hope Works
- Howard County Department of Community Resources and Services
- Howard County Department of Corrections
- Howard County Health Department
- Howard County Housing Commission
- Howard County Office of Workforce Development
- Howard County Public School System
- Humanim
- Laurel Advocacy and Referral Services
- Making Change
- Luminus

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

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

Howard County adopted a local Plan to End Homelessness (PEH) in 2010 and updated the plan in February of 2020 known as The Path Home. The Path Home establishes strategic goals that will align resources and services within the homeless response system. The strategic goals will guide specific annual action plans. The goals and action plans will place emphasis on ensuring that the coordinated entry system includes necessary, appropriate, quality interventions and sufficient capacity to meet the needs of those presenting to the system. These interventions will be housing first, and housing resources focused.

Howard County uses a Coordinated Entry System to meet the individualized needs of homeless persons. It utilizes the following four (4) steps:

1. Access through entry points known to the community. Accomplished by hotline, crisis center, safe house, and street outreach.
2. Assess strengths, barriers, and vulnerabilities. Accomplished by triage and standard assessment VI-SPDAT and Prevention Targeting Tool.
3. Prioritize specific and defined set of criteria. Accomplished by a name list.
4. Refer connection to available resources. Accomplished by prevention, shelter, case management, rapid rehousing, and permanent supportive housing.

### **Addressing the emergency shelter and transitional housing need of homeless persons**

Howard County's Strategic Plan to End Homelessness's Goal #2 is to ensure that every person experiencing homelessness in Howard County has access to immediate, safe, and appropriate shelter. An effective homeless response system includes immediate access to low-barrier emergency shelter coupled with skilled, engaged street outreach. The Coalition is committed to ensuring that no person is forced to sleep in a place not intended for human habitation or loses their life because of their homeless experience. The Coalition will provide continuous outreach to unsheltered homeless individuals who otherwise might not seek out services and ensure sufficient emergency shelter capacity to meet the needs of the community. Howard County intends to meet this goal by:

- Ensuring adoption of a system-wide housing first approach by all Coalition members and eliminate policies and practices that do not embrace a housing first approach. This includes county residency requirements; participation in services; income requirements; and behavior requirements unrelated to health and safety.
- Establishing a housing-focused street outreach team whose primary responsibility is to identify and engage people experiencing unsheltered homelessness and connect them to shelter (if available and desired) and coordinated entry for permanent housing resources.
- The CoC should collect, review, and analyze key output and performance measure outcome data to ensure on-going effectiveness of street outreach services.
- Continue implementation of a low-barrier, housing first approach to accessing and staying in emergency shelter in Howard County and eliminate requirements unrelated to health and safety to access and remain in shelter.

- Provide housing-focused, rapid-exit services to quickly connect all households residing in emergency shelter to safe and appropriate permanent housing.
- Regularly review program level data on shelter outcomes relating to placement rates in permanent housing, timely exits, and cost-effectiveness to target system performance improvement strategies.
- Target limited transitional housing resources to the most vulnerable people experiencing homelessness by participating in the coordinated entry system and eliminate rules that screen people out due to perceived barriers.
- Shift the focus of supportive services in transitional housing programs to align with a housing-focused, rapid-exit approach.

(Source: The Path Home, Howard County’s Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 25)

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

Howard County’s Strategic Plan to End Homelessness’s Goal #3 is to increase access to permanent housing for people experiencing homelessness in Howard County. An effective homeless response system has an affordable and diverse supply of housing that meets the needs of the most vulnerable persons. Currently, households experiencing homelessness in Howard County struggle to access permanent housing in a timely manner. Challenges include limited landlord engagement and recruitment; limited affordable housing; and limited rapid re-housing program capacity. Howard County intends to meet this goal by:

- Ensuring that the most vulnerable households fleeing domestic violence, dating violence, sexual assault, and stalking are prioritized for all available housing resources within the CoC, and to come into compliance with federal and state requirements, Hope Works HSP (ESG) funded program should more fully participate in the coordinated entry system.
- Increasing permanent housing opportunities and decrease the time people experience homelessness in Howard County. The CoC Lead Agency should coordinate a systemwide landlord engagement strategy to create a pipeline of available units informed by data and the coordinated entry process.
- Adopting the National Alliance to End Homelessness’ Rapid Re-Housing Performance Benchmarks and Program Standards to fully incorporate the three core components and current best practices into CoC rapid re-housing projects.
- Scaling up rapid re-housing resources to make it the primary housing intervention in Howard County CoC.

- Assessing current permanent supportive housing projects and formalize a “move on” strategy to increase system flow and to ensure that this deep resource is serving the most vulnerable households using a dynamic prioritization approach.
- Ensuring that all permanent supportive housing adopts and implements a housing first approach in both policy and practice.

(Source: The Path Home, Howard County’s Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 27)

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

Howard County’s Strategic Plan to End Homelessness’s Goal #1 is to ensure that there are no new or repeat episodes of homelessness in Howard County. An effective homeless response system is one that safely and appropriately diverts households from homelessness and provides targeted homelessness prevention whenever possible. Howard County’s Coordinated Entry System will provide comprehensive, housing first services that apply a lens of racial equity, are culturally competent, and are guided by evidence-based best practices to minimize the duration and compounding impact of homelessness. This will include supportive pathways for those who do experience homelessness to achieve income maximization, exit to stable housing quickly, and prevent a repeat episode of homelessness in the future. Howard County intends to meet this goal by:

- Undertake a review and analysis of all prevention programs and prevention-type services that are both, operating in Howard County, and based on the goals of The Path Home.
- Determine which programs most appropriately align with the role of the homeless response system, and which may be better funded outside the system.
- Establish a system-wide homeless prevention program with written standards to include a standardized assessment and performance measure outcome benchmarks and goals.
- Develop and support a robust structure to implement diversion strategies and measure the impact on the homeless response system.
- To increase employment opportunities for households experiencing homelessness in Howard County, the CoC Lead Agency should coordinate a system-wide employment strategy informed by data and the coordinated entry process.
- The Coalition, led by the CoC Board, should explore and identify factors driving racial and ethnic disparities to determine who is experiencing homelessness and how different types of permanent housing resources are distributed by the homeless services system.

- The CoC Board should develop an action plan to reduce disparities and establish community-level performance measured outcome goals to track progress on these efforts.
- Re-assess and streamline current coordinated entry core elements — the ACCESS, ASSESS, PRIORITIZE and REFER processes — to achieve simplicity, clarity and transparency in system coordination and decision-making.
- Develop a dashboard using HMIS to track progress on system flow improvements and outcomes.

(Source: The Path Home, Howard County’s Strategic Plan to End Homelessness, The Five-Year Plan 2020 to 2025, pg. 23)

### **Discussion**

The Howard County Department of Housing and Community Development (DHCD) will fund the following FFY 2023 CDBG and HOME projects that will address homeless and other non-homeless special needs:

- Fair Housing Regional AI Coordinator
- Emergency Public Facility
- Bridges to Housing Stability Rehab to preserve affordable rental housing
- Bridges to Housing Stability Acquisition to increase affordable rental housing
- The Arc of Howard County Rehab preserving special needs housing
- The Howard County Housing Commission Rehab to preserve senior affordable housing
- Living in Recovery Rehab provides recovery housing
- Rebuilding Together Homeowner Rehab to preserve safe, decent affordable housing for homeowners
- Grassroots Crisis Shelter Program provides full spectrum sheltering for vulnerable residents
- Hope Works of Howard County provides transitional housing for victims of domestic violence
- Community Action Council Housing Stability provides eviction prevention assistance
- The Arc of Howard County provides tenant-based rental assistance (TBRA) for extremely low-income persons with disabilities.

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

### **Introduction**

The Howard County Human Rights Law states that Howard County shall foster and encourage growth and development so that all persons have an equal opportunity to pursue their lives free of discrimination. The ordinance states it is unlawful to discriminate against a person based on race, creed, religion, disability, color, sex, national origin, age, occupation, marital status, political opinion, sexual orientation, personal appearance, familial status, source of income, and gender identity or expression. Potential housing, law enforcement, employment, public accommodations, and financing complaints are accepted by the Howard County Office of Human Rights and Equity.

The Office of Human Rights and Equity is responsible for the following actions:

- Investigate and process complaints of unlawful discrimination in Employment, Housing, Public Accommodation, Law Enforcement and Financing (Lending Institutions).
- Resolve complaints by conference, conciliation or through mediation.
- Enforce the Howard County Human Rights Law.
- Conduct public hearings on issues affecting the protection and promotion of Human Rights.
- Conduct studies, surveys and publish reports.
- Recommend policies on Civil and Human Rights to the County Executive.
- Cooperate with other local, state, and federal agencies and officials to protect and promote better human relations.
- Serve as an advocate to address issues involving discrimination, human relations and diversity.
- Initiate and participates in outreach activities and events with governmental and community organizations.
- Serve as a liaison with the public, governmental agencies and community groups to develop educational programs, heighten public awareness of discrimination and methods of eliminating discrimination.

### **Actions it planned to remove or ameliorated the negative effects of public policies that serve as barriers to affordable such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investments:**

The following action items that correspond to the number (1-10) fair housing issues/impediments were identified in the RAI to address public policies that could discourage affordable housing and residential investment:

1. Explore existing County policies that may inhibit the creation of affordable housing, such as County Council Bill CB 28-2023.

2. Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of organizations such as Columbia Housing Center.
3. Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units, especially in areas along transportation routes.
4. Support efforts to nurture and sustain racially integrated communities in Howard County, such as the Columbia Housing Center.
5. Open new land use opportunities through zoning changes (e.g., commercial, and industrial zones could allow affordable units) and/or donated land.
6. Continue or increase funding for creating units and/or subsidizing tenant rents in opportunity areas. (e.g., dedicated funding source for affordable housing).
7. Explore increased FMRs and/or Increased exception payment standards and provide mobility counseling to encourage voucher location in Opportunity Areas.
8. Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that: a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population; b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas.
9. Engage lenders in discussions about homeownership and mortgage lending disparities and potential solutions. Seek investments in financial literacy programs (including in schools) and assistance in helping subprime loan holders refinance to conventional loans. Develop specific action steps to address disparities in the minority homeownership rate.
10. Ensure that people with disabilities have control in the choice of their service provider by prohibiting leases that require tenants to receive supportive services from the provider operating the housing. Ensure that tenants cannot be evicted or discharged for reasons connected to their services.

Link to the Baltimore Regional Analysis of Impediments Plan:

<https://www.howardcountymd.gov/housing-community-development/publications-reports>

**Discussion:**

The County will fund the following affordable housing projects with FFY2024 CDBG and HOME funds:

**1. REBUILDING TOGETHER, HOWARD COUNTY**

As part of the national nonprofit organization dedicated to providing rehabilitation of residential structures to provide decent, safe, and affordable housing for low- to moderate-income households, Rebuilding Together of Howard County has provided

free home repairs to residents for 32 years. The average income of a client is \$29,000/year. With CDBG funds, Rebuilding Together will provide free home repairs for 50 low-income homeowners.

**2. HOPE WORKS**

Providing a wide range of services to people who have experienced domestic violence, Hope Works is an integral member of the County's Continuum of Care. CDBG funds will support the Transitional Housing Program for approximately 30-40 clients who are experiencing homelessness because of Domestic Violence.

**3. COMMUNITY ACTION COUNCIL**

Howard County residents, at or below 80% AMI, who are at risk of becoming homeless due to eviction, or who need assistance with first month's rent, are served by this longstanding organization. This program will maintain housing for 41 households, including veterans, families with children below five, single parents, persons over the age of 65, and individuals who identify as Black or African American. The program ensures housing stability and the need for cost-intensive homelessness programs.

**4. GRASSROOTS CRISIS INTERVENTION CENTER**

The most vulnerable residents are served by the Grassroots Emergency Shelter including those with a mental health diagnosis, substance abuse problem, serious physical health condition, and/or who fall in the Extremely Low to Low CDBG Income Limits Range (0-50%). CDBG funds will support the Family Shelter Program that will serve 40 households (90 individuals) and the Men's Shelter Program (50 individuals).

**5. THE ARC OF HOWARD COUNTY**

The Arc will use CDBG funds for renovations to seven locations that provide safe, healthy, and affordable housing for vulnerable County residents with intellectual and/or developmental disabilities (I/DD) who income-qualify. The project will benefit approximately sixteen (16) residents with I/DD in six (6) residential houses, 200 individuals with I/DD supported by a variety of day programs, and a staff of 70 working throughout the six sites in rotating shifts, around the clock.

**6. COLUMBIA HOUSING CENTER**

7. Through housing advisory and educational programming, Columbia Housing Center champions the original vision of founding developer James Rouse for integrated neighborhoods that are welcoming and attractive to all. The Affirmative Marketing Program furthers fair housing in Columbia, Maryland, in accordance with the Federal Fair Housing Act.

Also, DHCD maintains multi-year commitments of CDBG funding to these vitally important projects:

**1. ROGER CARTER COMMUNITY CENTER**

In collaboration with the Howard County Housing Commission, DHCD invests annual CDBG funds under an approved pre-award strategy to support this key facility for neighborhood revitalization, while meeting HUD's National Objective for Low-Mod Area Benefit. DHCD is

invested for forty (40) years (June 1, 2003 - June 1, 2043) in the Roger Carter community Center to ensure the continued well-being of the residents of Burgess Mill Station and surrounding Ellicott City neighborhoods. The Center includes a swimming pool, splash pad, gymnasium, dance room, meeting rooms, fitness rooms, rock climbing wall, walking track & more.

## **2. HOWARD COUNTY HOUSING COMMISSION**

Established in 1990 as the public housing authority for Howard County, the Howard County Housing Commission operates a 'safe house' on several acres of land in a "campus-like" setting that provides housing for low- and moderate-income women and mothers who are victims of domestic violence. The facility houses a maximum of 10 individuals and one (1) on-site residential director.

## **3. BALTIMORE METROPOLITAN COUNCIL (BMC)**

DHCD is a member of the BMC, a consortium of regional Participating Jurisdictions and Public Housing Authorities that contribute to the total funding of BMC's Housing Policy Coordinator position. The coordinator is an essential position for carrying out the Baltimore Regional Fair Housing Action Plan and developing an Analysis of Impediments (AI) Report. DHCD contributes 7.5% annually to BMC for these purposes.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

Howard County has developed the following actions to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public, private housing and social service agencies.

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

Despite the County's best efforts and efforts of service providers, there are obstacles to meeting the underserved housing needs in Howard County. Some of these needs are the: high cost of housing; gap between incomes and housing costs; high cost of developable land; accessible housing needs; and cycle of poverty. Under the FFY2024FFY2024CDBG Program the County will take the following actions to better address underserved needs:

- Continue to leverage its financial resources and apply for additional public and private funds.
- Continue to provide financial assistance for new housing development and rehabilitation.
- Continue to provide funding for public service activities.
- Continue to provide public facility improvements.

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

The County will fund the following affordable housing projects with FFY2024FFY2024CDBG, CDBG Section 108 Loan Program, and HOME funds:

- Columbia Housing Center Affirmative Marketing Program
- Community Action Council Housing Stability/Eviction Prevention
- Contribute to the Fair Housing Regional AI Coordinator position of the Baltimore Metropolitan Council
- Section 108 Loan Guarantees to fund redevelopment rehabilitation of two aging apartment complexes, Ranleagh Court and Waverly Winds
- Grassroots Shelter Program – operation of an emergency shelter
- Hope Works of Howard County, Transitional Housing for homeless persons and victims of Domestic Violence
- Howard County Housing Commission, Operation of Safe House for Domestic Violence Survivors
- Rebuilding Together, Year-Round Critical Repairs for low- and moderate-income homeowners
- Roger Carter Recreation Center, multi-year commitment to sustain operations of a Public Facility for use by low- and moderate-income residents
- Down Payment Loan Assistance for four (4) Moderate-income homeowners in Howard County

- The Arc of Howard County Residential Structure Rehabilitation

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

When the County aids homebuyers or homeowners, and if the houses were constructed prior to 1978, a visual lead-based paint inspection is conducted prior to the settlement on the property and appropriate action taken, if necessary. The following tasks are performed prior to the start of the actual rehabilitation or purchase of the property to ensure the health of residents:

- As part of a loan application the following facts are determined: the date of the dwelling's construction (or at least whether the dwelling was constructed prior to 1978); whether a child under the age of seven is a resident or frequent visitor to the dwelling; and whether the applicant is aware of any lead-based paint hazard and/or flaking or peeling paint on any surface.
- If the dwelling was constructed prior to 1978 and/or any of the other information solicited indicates the possibility of the presence of a lead-based paint hazard, the rehabilitation specialist will make a thorough inspection to determine whether a hazard exists or if there is good reason to believe that a hazard exists, and to what extent. Based on this inspection, a test by a licensed testing firm may be ordered to make a risk assessment. The costs of such a test as well as the cost of abatement or hazard reduction are eligible project costs.
- If test results indicate a significant lead hazard exists, and there are children under the age of seven in the property, it will be recommended that the applicant have the children tested by a health professional to determine if they have an elevated blood lead level.
- Each household applying to the program will be provided with a copy of the most recent edition of the informational pamphlet on lead-based paint published by the U.S. Department of Housing and Urban Development. The applicant must sign a receipt verifying that he/she has been given the pamphlet. This receipt becomes a part of the project file.
- If lead hazard reduction or lead abatement work is to be undertaken as a part of the scope of work, a state certified lead paint abatement contractor must be utilized. Program staff will provide a current list of certified contractors for use by the applicant in obtaining proposals.

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

Data aggregated in 2022 by the Association of Community Services of Howard County indicates that approximately 4.8% of the County's residents, including children, live in poverty, a decrease from 5.1% reported in 2020, and which is less than the State of Maryland's poverty rate of 10.0%.

The County's goal is to reduce the extent of poverty by working with our network of community partners to support identified need throughout the county and fund activities that directly and indirectly reduce poverty in Howard County.

During this program year, DHCD will fund the following activities with FFY2024FFY2024CDBG and HOME funds to reduce the number of poverty-level families:

- Fair Housing Regional AI Coordinator Activity
- Columbia Housing Center Affirmative Marketing Program
- Roger Carter Recreation Center Redevelopment
- Emergency Public Facility
- Bridges to Housing Stability Rehab
- Bridges to Housing Stability Acquisition
- The Arc of Howard County Rehab
- The Howard County Housing Commission Rehab
- Living In Recovery Rehab
- Rebuilding Together Homeowner Rehab
- Grassroots Shelter Program
- Hope Works of Howard County Transitional Housing
- Community Action Council Housing Stability
- The Arc of Howard County TBRA Program
- Down Payment Assistance

**Actions planned to develop institutional structure:**

DHCD coordinates activities among the public and private agencies and organizations in the County. This coordination will ensure that the goals and objectives outlined in the FFY 2020-2024 Five Year Consolidated Plan will be effectively addressed by more than one entity. The following entities will carry out the FFY2024FFY2024annual goals and objectives:

- Howard County Housing Commission – manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable multifamily rental housing.
- Howard County Department of Community Resources and Services oversees the County’s CoC and administers the County’s aging and disability services.
- Baltimore Metropolitan Council will provide fair housing education.
- Rebuilding Together will provide housing rehabilitation for qualified owner-occupied households.
- Bridges to Housing Stability will provide housing to a low-income family working in Howard County; and provide transitional housing.
- The Arc of Howard County will provide critically needed special needs housing.
- Grassroots Crisis Intervention Center will provide supportive services to homeless persons.
- Hope Works will provide transitional housing.
- Community Action Council will provide housing stability assistance to prevent eviction.
- Living in Recovery will provide recovery housing.

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

DHCD will continue to act as a coordinator between housing and social service activities provided by the County and activities provided by the Housing Authority, the Continuum of Care, private and non-profit housing providers, and social service agencies to address the housing and community development needs of the County. DHCD will accomplish this coordination by continuing to attend outside agency planning meetings, provide technical assistance for funding options and program compliance, participate in planning initiatives, and act as network connection between entities. DHCD will coordinate with the following entities to address the FFY2024FFY2024annual goals and objectives:

- Howard County Housing Commission – manages the Section 8 Housing Choice Voucher Program, administers the Family Self Sufficiency Program, and develops affordable housing.
- Howard County Department of Community Resources and Services oversees the County’s CoC and administers the County’s aging and disability services.
- Baltimore Metropolitan Council – will provide fair housing education.
- Rebuilding Together will provide housing rehabilitation to qualified owner-occupied households
- Bridges to Housing Stability will provide housing to low-income family working in Howard County; and provide transitional housing.
- The Arc of Howard County will provide critically needed special needs housing
- Grassroots Crisis Intervention Center will provide supportive services to homeless persons.
- Hope Works will provide transitional housing.
- Community Action Council will provide housing stability assistance to prevent eviction.
- Living in Recovery will provide recovery housing.

**Discussion**

DHCD has the primary responsibility for monitoring the County's Consolidated Plan and Annual Action Plan. DHCD maintains records on the progress toward meeting the goals and the statutory and regulatory requirements of each activity. DHCD has a monitoring process that is focused on analyzing and comparing projects and activities based on program performance, financial performance, and regulatory compliance. The accomplishments of the FFY2024FFY2024CDBG and HOME activities will be reported in the FFY 2023 Consolidated Annual Performance and Evaluation Report (CAPER) and be used as a basis for future funding decisions.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

Under the FFY2024 CDBG Program, the County anticipates receiving a grant in the amount of \$1,310,347 and \$10,000 in Program Income for the year for a total budget of \$1,320,347. The County will budget \$28,242 for general program administration and \$110,000 for Fair Housing activities for a total Planning and Administration budget of \$138,2420 (10%).

The balance of funds will be allocated to activities which principally benefit low- and moderate-income persons. The activities which principally benefit low- and moderate-income persons are divided between Public Facilities \$436,0050.00 (33%), Housing Activities \$550,000.00 (42%), and Public Service \$196,100.00 (15%).

The County meets the HUD regulations for project caps by allocating the following FFY 2023 CDBG funds:

- Planning and Administration \$138,242 or 10% allocation
- Public Services \$196,100 (15%)
- Demolition \$0 or 0.0%
- Urgent Need \$0 or 0.0%

Under the FFY2024FFY2024HOME Program, the County anticipates receiving a grant in the amount of \$573,996 and \$0.00 in program income for the year for a total FFY2024FFY2024budget of \$573,996. The County will use \$107,625.25 in contributions from the County's banked Match from prior housing projects as HOME Match for FFY 2024.

#### Other Federal requirements and nondiscrimination.

The Federal requirements set forth in 24 CFR part 5, subpart A, are applicable to participants in the HOME program. The requirements of this subpart include nondiscrimination and equal opportunity; disclosure requirements; debarred, suspended or ineligible contractors; drug-free work; and housing counseling.

The nondiscrimination requirements at section 282 of the Act are applicable. In addition:

- Howard County will not limit or give preference to students.
- Howard County will not limit beneficiaries or give preference to employees of this

jurisdiction.

**Community Development Block Grant Program (CDBG)  
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	10,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>10,000</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80-90%

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

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:  
*Howard County does not intend to use other forms of investments beyond those identified in Section 92.205.*
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

### **Recapture Guidelines**

The County (to ensure affordability) is required by the HOME program to impose either resale or recapture requirements, at its option. Howard County has previously used the recapture provision and will continue to do so during the next Consolidated Plan period. Recapture provides a mechanism to recapture all, or a portion, of the direct HOME subsidy from the net proceeds when the property is sold. If the HOME recipient decides to sell the house within the affordability period the homebuyer can resell the property to any willing buyer, but the sale during the affordability period triggers the repayment of the direct HOME subsidy. The recapture provision will be outlined in a Note and a Deed of Trust recorded within the land records of Howard County. The loan will be deferred until an event occurs which might trigger recapture. Any such recapture will be limited to the net proceeds. If the net proceeds of the sale are insufficient to pay the HOME investment, the County may only recapture an amount less than or equal to the net proceeds. For additional information, see attached HOME Policies and Procedures.

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

### **Recapture Guidelines**

The County (to ensure affordability) is required by the HOME program to impose either resale or recapture requirements, at its option. Howard County has previously used the recapture provision and will continue to do so during the next Consolidated Plan period. Recapture provides a mechanism to recapture all, or a portion, of the direct HOME subsidy from the net proceeds when the property is sold. If the HOME recipient decides to sell the house within the affordability period the homebuyer can resell the property to any willing buyer, but the sale during the affordability period triggers the repayment of the direct HOME subsidy. The recapture provision will be outlined in a Note and a Deed of Trust recorded within the land records of Howard County. The loan will be deferred until an event occurs which might trigger recapture. Any such recapture will be limited to the net proceeds. If the net proceeds of the sale are insufficient to pay the HOME investment, the County may only recapture an amount less than or equal to the net proceeds. For additional information, see attached HOME Policies and Procedures.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: Howard County will not use HOME funds to refinance existing debt.
5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

The County makes applications available to non-profits, for-profit agencies, and other public agencies/organizations for eligible CDBG and HOME funded activities. A percentage of the County's Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds are awarded on a competitive basis to applicants for eligible activities. The applications are reviewed by the Department of Housing and Community Development and finally submitted to the Howard County Council for approval.

#### **Howard County Affordable Rent Standards for the CDBG Program**

Howard County provides funds to project sponsors and clients to acquire, rehabilitate and otherwise assist with the development of housing, both owner-occupied and rental, for low- and moderate-income persons. For CDBG funds to be utilized to assist a rental project, rents must be affordable to comply with the low- and moderate-income housing national objective standard. Howard County has two separate definitions of affordable rents, one for projects funded exclusively with CDBG funds, and one for projects combining CDBG funds with other federal and/or State funding.

For rental projects where CDBG is the only source of federal funds and there are no State funds, affordable rents are defined as rents, excluding the utility allowance, which do not exceed the lesser of the Fair Market Rent, as determined by HUD from time-to-time, or that amount which would be equal to 30 percent of the gross monthly income of a household earning 80 percent of the area median income, adjusted by family size, for the area as defined and published by HUD. For this determination, it will be assumed that an efficiency unit will be occupied by a single person, a one-bedroom unit by two persons, a two-bedroom unit by three persons, a three-bedroom unit by four persons, and a four-bedroom unit by a five or more-person household.

For rental projects, utilizing CDBG funds with other federal and/or state funds, affordable rents are defined by the other programs' requirements if the project continues to serve persons at or below 80 percent of the area median income. The other programs, include but are not limited to, HOME, federal Low-Income Housing Tax Credits, housing mortgage revenue bonds, public housing capital funds or public housing operating subsidies, HOPE VI, Project Based Section 8,

Section 202 or Section 811 development funds, state rental housing development programs, and other similar government funded programs.