

State of Hawaii

DRAFT ANNUAL ACTION PLAN

Fifth Program Year
(July 1, 2019 - June 30, 2020)

March 2019

Hawaii Housing Finance and Development Corporation

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Draft - Annual Action Plan
2019

This Draft PY2019 Annual Action Plan contains estimated funding amounts for the ESG, HOME, HOPWA, and HTF programs. The final version of the PY2019 AAP will contain actual funding amounts for PY2019 under these programs.

Executive Summary

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

1. Introduction

The ConPlan is a planning document that ensures that jurisdictions receiving federal assistance plan for the housing and related needs of low-income and moderate-income families to improve the availability and affordability of decent, safe and sanitary housing in suitable living environments. The Annual Action Plan (Plan) identifies the objectives targeted to address priority needs for the program year. It is also an application for funds under HUD's formula grant programs: HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) programs.

The HOME and HTF programs are administered by the state's Hawaii Housing Finance and Development Corporation (HHFDC) and the ESG and HOPWA programs are administered by the state's Homeless Programs Office (HPO) of the Department of Human Services' Benefit, Employment and Support Services Division (DHS-BESSD). The HOME, ESG and HOPWA programs described in this plan will focus on the neighbor island counties of Hawaii, Kauai and Maui. HTF funds will serve the neighbor island counties as well as the City and County of Honolulu. Development of this plan involved consultation with government housing agencies, continuum of care planning groups, working group meetings with public and private service providers, public hearings to solicit input on housing needs and priorities, and the publication of notices in a newspaper of general circulation and on HHFDC's website to solicit public comments on the draft Plan.

2. Summarize the objectives and outcomes identified in the Plan

HHFDC may use the annual HOME allocation to promote decent, affordable housing, strengthen communities, and increase homeownership opportunities, via the construction of new or rehabilitation of existing affordable rental and for-sale housing, TBRA, transitional housing, various county homebuyer loan programs, and for homebuyer education and counseling sessions.

For PY2019, the State will receive approximately \$3,008,138 in HOME funds. Ten percent will be reserved for administrative costs, and 15% will be set aside for CHDO activities. The County of Kauai will receive the PY2019 HOME allocation under HHFDC's annual rotation. The State allows the counties to retain HOME Program Income for additional eligible activities, including up to 10% for administration. The State will permit pre-awards of up to 25% of a county's current program year's allocation for HOME-eligible activities to avoid interruption of projects and/or services. Pre-awards must be authorized in writing by the State before costs are incurred. Pre-award costs greater than 25% will require approval by the local HUD Field Office before the costs are incurred.

HHFDC will use the annual HTF allocation to promote decent, affordable housing and strengthen communities through the production of new or rehabilitation of existing affordable rental housing serving extremely low-income households earning 30% or less AMI; the State anticipates receiving HTF of \$3,000,000. HHFDC will retain 5% of the allocation for administration, and allocate the balance to the counties as Subgrantees. Fifty percent will be allocated to the City and County of Honolulu. The

remaining 50% will be allocated to the neighbor island counties on the same rotation as the HOME rotation. The County of Kauai will receive the PY2019 HOME funds, so it will also receive the PY2019 HTF allocation. HHFDC will allow pre-award costs for planning activities and preparation of the HTF allocation plan of up to 5% of the minimum allocation amount of \$3 million. HHFDC's PY2019 HTF Allocation Plan is shown in HTF Attachment A, and is subject to HUD's approval.

For PY2019, the State will receive approximately \$437,933 in ESG and \$258,770 in HOPWA funds. DHS-BESSD anticipates requesting pre-award authority from HUD in order to continue the implementation of ESG and HOPWA projects without interruption. ESG and HOPWA funds will be used in Hawaii, Kauai and Maui to meet the objectives of promoting decent affordable housing and strengthening communities. In collaboration with HPO, Bridging The Gap (BTG) has determined that PY2019 ESG funds will be allocated at approximately 1% for costs to manage and operate the Homeless Management Information System (HMIS), and 5% for administrative costs for DHS-BESSD. The remainder of the grant will be allocated to emergency shelter operations (40%) and homelessness prevention (HP) and rapid rehousing (RR) activities (60%). This formula reflects a greater emphasis on HP and RR and helping people to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. These activities include financial assistance for rents, security deposits and utilities, and housing relocation and stabilization services. Agencies awarded funding will be allowed a maximum of 2.5% for administrative costs.

For PY2019, the State will use its HOPWA funds in the Counties of Hawaii, Kauai and Maui to promote decent, affordable housing and suitable living environments for persons with HIV/AIDS. Its focus will be on providing housing information, rent or deposit assistance, and other supportive services to persons with HIV/AIDS who are homeless or at risk of homelessness.

3. Evaluation of past performance

HHFDC and DHS-BESSD, through their administration of the State's HOME, ESG and HOPWA programs, have assisted many communities, families and individuals in the State. HHFDC acts as the pass-through agency of HOME funds to the Counties of Hawaii, Kauai and Maui, overseeing the appropriate use of HOME funds and ensuring compliance with HOME regulations. In the past, HHFDC divided the annual HOME allocation between the three neighbor island counties. Due to the limited amount of HOME funds available, counties had to "save up" several years' allocations to proceed with a project, resulting in red flags from HUD to improve compliance with expenditure deadlines. In response, HHFDC implemented a rotating allocation between the neighbor island counties, giving each county an entire year's allocation of HOME funds (less HHFDC's retention of 5% for administrative purposes). The rotation between the three neighbor island counties gives each county two years between allocations to plan for HOME projects and programs; this strategy appears to help the counties meet the recent and more stringent HOME regulations relating to commitment deadlines.

The County of Hawaii received the PY2018 HOME allocation, and planned to use these funds for the Kaloko Heights affordable rental project, for its TBRA program, for a to-be-determined CHDO project, and for its administration. The County of Kauai will receive the PY2019 HOME allocation, and plans to use HOME for its Pua Loke affordable rental project and for its administration of the HOME program. The County of Kauai also anticipates using HOME program income for its Pua Loke project. The County of Kauai is in the process of soliciting an eligible CHDO activity for PY2019, and intends to utilize HOME CHDO funds for the development of affordable homeownership housing in Waimea; these funds may provide approximately 10 affordable homeownership units. Once selected, the PY2019 AAP will be amended to include the specific CHDO activity. The County of Hawaii does not anticipate receiving program income in PY2019, but any program income received will be used for its TBRA program. The County of Maui does not anticipate receiving program income in PY2019 but any program income received will be used for its Kahoma Residential Self Help Housing project.

PY2016 was HHFDC's first year to administer HUD's new National Housing Trust Fund program. HHFDC will run its HTF program as follows: retain 5% of the annual allocation for HTF administration; distribute 50% of the remaining allocation to the City and County of Honolulu; and distribute the final 50% of the allocation to one of the neighbor island counties, on the same rotation as the HOME program. In accordance with the neighbor island HOME rotation, the County of Kauai will receive the neighbor island portion of HTF for PY2019.

DHS-BESSD administers the ESG and HOPWA programs and awards funds to service providers in the neighbor island counties through a competitive selection process. It oversees the use of ESG and HOPWA to ensure the appropriate, efficient, and timely use of funds.

HUD has evaluated the State as having met its communities' needs and the goals of the HOME, HTF, ESG and HOPWA programs through its implementation of its Consolidated Plan and Annual Action Plan.

4. Summary of Citizen Participation Process and consultation process

Development of this Plan involved consultation with government housing agencies, continuum of care planning groups, working group meetings with public and private service providers, public hearings to solicit input on housing needs and priorities, and the publication of notices in newspapers of general circulation and on HHFDC's website to solicit public comments on the draft Plan.

Public hearing notices were published in regional newspapers and in the Honolulu Star-Advertiser (a newspaper of general circulation). A series of public hearings were held in September, 2018 through November 2018 in each of the counties to solicit input on the State's and County's housing needs and priorities. Public hearings were held in Kailua-Kona and Hilo, County of Hawaii; Lihue, County of Kauai; Wailuku, County of Maui; and Honolulu, City and County of Honolulu. Each of the counties also held public hearings, first to gather input on the need and priorities of the Plan, and subsequently to accept public comments on their respective draft Annual Action Plans. Comments received at public hearings attested to the need for affordable rental and homeownership housing statewide. Testimony was received from several attendees advocating for affordable housing for people with intellectual and developmental disabilities. Written comments and HHFDC's responses are attached.

On March 22, 2019, HHFDC published a public notice to solicit comments on the draft PY2019 Annual Action Plan (AAP). The public notice and copies of the draft AAP were available for review at regional libraries throughout the state, the neighbor island counties' housing offices, the City and County of Honolulu's Department of Community Services, the offices of DHS-BESSD and HHFDC, and on HHFDC's website at www.hawaii.gov/dbedt/hhfdc. Comments received during the 30-day public comment period will be reported in the final AAP.

5. Summary of public comments

Public comments received at public hearings across all counties evidenced the need for more affordable housing, both rental and homeownership, and more support for persons with special needs. All counties reported an unmet need for affordable rentals for seniors and families.

A summary of the comments received at public hearings follows:

- affordable housing is needed in all counties, especially rental housing, both single-family and multi-family rental housing. The lack of affordable rental housing for families and seniors continues to be a major problem for Hawaii's residents.

- there is a need for affordable housing for people with special needs. There is a shortage of care homes in communities for people with intellectual or developmental disabilities. This population cannot access market-based homes, and are at great risk for becoming homeless. Care homes exist predominantly in central or west Oahu, but have wait lists of 10+ years. Care homes are scarce in Honolulu and east Honolulu. There is a need for permanent residential solutions, such as group homes and apartments, to support this population.

- the number of homeless people in the neighbor island counties appears to be increasing, even though the Point-in-Time homeless count indicates a decrease. More resources are needed for the chronically homeless and the mentally ill who are homeless. Youth aging out of foster care into homelessness is increasing as well. There is a need for emergency shelters for homeless families with children.

- Landlord education is needed, to increase the number of landlords participating in the Section 8 program. Many Section 8 vouchers are unused because there is a lack of available rental units, and landlords do not want to participate in the Section 8 program. Landlord education could explain how Section 8 benefits the landlord in terms of guaranteed and on-time payments. Tenant education is needed too, so that tenants will maintain their units.

HHFDC published a Notice of Public Comment on March 22, 2019, soliciting comments on this draft PY2019 Substantial Amendment. Comments received during the 30-day public comment period will be reported in the final version of this AAP.

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

7. Summary

PR-05 Lead & Responsible Agencies - 91.300(b)

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

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

Agency Role	Name	Department/Agency
Lead	Hawaii Housing Finance and Development Corporation (HHFDC)	Department of Business, Economic Development and Tourism (DBEDT)
ESG Administrator	Homeless Programs Office (HPO)	Department of Human Services – Benefits, Employment and Support Services Division (DHS-BESSD)
HOME Administrator	HHFDC	DBEDT
HOPWA Administrator	HPO	DHS-BESSD
HTF Administrator	HHFDC	DBEDT

Table 1 – Responsible Agencies

Narrative

HHFDC administers HUD's HOME Investment Partnerships and National Housing Trust Fund programs and is the lead on the Consolidated Plan for the State of Hawaii. HPO administers HUD's Emergency Solutions Grant and Housing Opportunities for Persons with AIDS programs.

Consolidated Plan Public Contact Information

Craig Hirai is the Executive Director of HHFDC and contact person for the Consolidated Plan, HOME and HTF programs. His contact phone number is (808) 587-0641 and email address is craig.k.hirai@hawaii.gov.

Harold Brackeen, III is the Administrator for the Homeless Programs Office of DHS-BESSD and contact person for the ESG and HOPWA programs. His contact phone number is (808) 586-7072 and email address is HBrackeenIII@dhs.hawaii.gov.

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

HHFDC, DHS-BESSD and the county housing agencies formed a core working group to coordinate the development and implementation of the Consolidated Plan. The core group utilized the 2018 Homeless Point-In-Time Count Report, the 2011 and 2016 Hawaii Housing Planning Study, the 2014 Rental Housing Study Update, and the 2010 and 2016 Analysis of Impediments to Fair Housing Choice to aid in the development of the Consolidated Plan Annual Action Plan.

The State's HHFDC oversees the affordable housing finance and development in Hawaii, for sale or rent to qualified residents. The State's DHS-BESSD administers federal and state programs that provide housing and services for the homeless and other persons with special needs. Together, the HHFDC and DHS-BESSD have established an extensive network of public and private organizations involved with the provision of housing or supportive services.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

Pursuant to 24 CFR Part 91-110, HHFDC consulted with its network of organizations including HUD, DHS-BESSD, and county housing agencies, state health and human services departments, and nonprofit entities involved with financing, developing and managing housing, and providing supportive services. DHS-BESSD and the county housing agencies augmented the state's network by outreaching to stakeholders at the local level (e.g., nonprofit housing advocacy groups, shelter and service providers, local government agencies). The Counties of Hawaii and Maui conducted surveys of its residents to measure housing needs, as well as the elderly need for supportive services such as personal care, transportation, meals and chore services.

DHS-BESSD/HPO, in conjunction with the Office of the Governor's Coordinator on Homelessness and the Hawaii Interagency Council on Homelessness (HICH), has continued its work on the State's Plan to End Homelessness. This plan was adopted in 2012 and mirrors the Federal Opening Doors plan in its major objectives, among which is a re-tooling of the Crisis Response System. The HICH is chaired by the Governor's Coordinator on Homelessness and consists of 27 members representing federal, state, and county government agencies, as well as the continua of care, faith-based community, and the business sector.

In 2019, the HICH will continue work on its 10-year plan to end homelessness. The plan has resulted in the expansion of Housing First and Rapid Rehousing programs, the establishment of new programs to address diversion from the healthcare and criminal justice systems, and supported amendments to the State's 1115 Medicaid waiver that will provide additional tenancy supports for chronically homeless individuals. A work group is currently reviewing the State's 10-year plan and strategic framework, including the progress in implementing the plan. Based on its review, the group will report back to the full HICH with recommendations.

In addition, a State plan entitled "Pressing the Levers of Change: Hawaii State Framework to Address Homelessness," strategically focuses on affordable housing; health and human services; and public safety. The framework is based on the Department of Human Services' and Department of Health's "Ohana Nui" model, a multi-generational approach that invests early and concurrently in children and families to improve health, education, employment and other outcomes. The goal for this plan is to implement a housing first approach on a system-wide scale by 2020 and aims to reach functional zero, which is described as Hawaii having: 1) sufficient housing for all homeless individuals; and 2) appropriate services to transition individuals to permanent housing, regardless of their levels of need. (See PDF document of "Pressing the Levers of Change: Hawaii State Framework to Address Homelessness" at: <https://humanservices.hawaii.gov/wp-content/uploads/2018/02/Hawaii-State-Framework-to-Address-Homelessness-July-2016.pdf> .)

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

DHS/HPO contractually requires all homeless provider agencies funded by State and/or Federal resources to participate in their respective county's Continuum of Care (CoC) for collaboration and input into the community planning efforts. The contracted agencies include those providing outreach, emergency/transitional shelters, assessment centers, permanent supportive housing (PSH), rapid re-housing (RRH), homeless prevention, housing first, and/or support services programs. Participants include chronically homeless and at-risk individuals and families; veterans; severely mentally ill; chronic substance abusers; persons with HIV/AIDS; victims of domestic violence; and unaccompanied youth.

Bridging the Gap (BTG) is the union of all three rural county chapters which comprise the Hawaii balance-of-state CoC representing the counties of Hawaii, Kauai and Maui. BTG is a geographically-based group of relevant stakeholder representatives that carries out the planning responsibilities of the CoC programs. Community Alliance Partners (Hawaii County), Kauai Community Alliance, and the Maui Homeless Alliance are the neighbor island chapters which strive to end homelessness in their geographic areas. Additionally, neighbor islanders are well-represented on the Hawaii Interagency Council on Homelessness and have adopted its strategic plan as its standard.

BTG continues to make progress in coordinating homeless services through the Coordinated Entry System (CES) and case conferencing (CC) process. (See the BTG Coordinated Entry System Policy and Procedures Manuals for Singles and Families at: https://www.hawaiihomelessprogramshmis.org/media/uploads/btg_ce_policy_and_procedures_manual_2018_june_revisions_3.pdf .)

Recent advancements in HMIS has allowed for the implementation of an automated BTG CES referral system:

- In 2018, BTG streamlined the By Name List (BNL) prioritization scheme and eligibility requirements for its housing resources to improve the overall effectiveness of the CES.

- BTG has developed CES automation in the HMIS database to more effectively match clients on the BNL to vacancies in housing resources. This has enabled clients to be referred to transitional housing, RRH and PSH programs in real-time, decreased the length of time from referral to housing placement, and reduced subjectivity in the matching and referral processes.
- In 2019, BTG will continue to refine CES processes and reports to remove system redundancies and improve the flow of CES referrals. All efforts will focus on increasing permanent housing exit rates and expanding permanent housing capacity throughout the CoC.

In preparation for the implementation of the CES automated system, BTG's HMIS Administrator traveled to each county to provide training. Topics included:

- An overview of the CES process;
- Data quality fundamentals - best practices for effective referrals, and updates to referral and assessment records;
- How to update referrals and assessments as they become placed/housed in program resources;
- Review of the NEW HMIS Referral Report – Main and sub-reports, and using system contact and case note functionality to enhance communication among providers;
- New consent update report;
- An overview of upcoming changes to the referral process based on system automation;
- Review of current CES related reports in HMIS;
- Review of client document readiness;
- Review of updated VI SPDAT and BNL prioritization and policies;
- Step by step instructions on requesting referrals to TH, RRH & PSH programs in HMIS; and
- Discussion regarding re-assignments and manual referrals.

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

BTG works closely with the State's Homeless Programs Office, the ESG program administrator, to ensure that the Consolidated Plan and Annual Action Plan are completed accurately and represent local efforts in each rural county jurisdiction. As the responsible party for the homeless and special needs sections of the ConPlan, this planning consortium discusses subgrantee resource utilization, funding prioritization, and performance standards. The CoC consistently partners with HPO to provide assistance to all jurisdictions with regard to the ConPlan development process. Annual Point In Time (PIT) data is used to supplement and add context to the reporting along with performance, demographic, and subpopulation characteristics of specific counties and over the entire CoC. Each year, the HMIS Administrator and representatives from HPO provide PIT training in Maui, Kauai, Hilo and Kona to ensure that a consistent, accurate methodology is used in each geographic location.

Data-driven performance standards are continually being updated and refined. These enhancements will allow the CoC to utilize outcome measures to determine funding levels for applicants. HPO persists in its efforts to develop a means to transform State funding determinations to more closely reflect performance standards and performance based funding as does HUD. While these systemic changes are ongoing, the mechanisms to achieve and maintain progress have been executed. In 2018, BTG and its HMIS Administration Team, in collaboration with HPO, made significant modifications in HMIS to streamline the data collection and reporting requirements for homeless service programs, including:

- creating new timeliness and data quality reports to help organizations quickly identify and remedy areas of deficiency. These reporting tools have helped BTG to achieve high data quality standards and reduced the referral to housing placement ratio.

- working to create HUD System Performance Measure (SPM) dashboards to provide visual cues regarding performance. These dashboards interactively convey performance data at the CoC, county, and project levels.

Data committee meetings with representatives from BTG and Oahu's CoC, Partners In Care (PIC), are convened on a monthly basis. BTG and PIC continue their collaboration to accomplish the system's full potential, and being in compliance with HUD's data standards.

The BTG board has scheduled all-day strategic planning workshops for 2019 which will include updating written standards for providing ESG and CoC Program assistance, BTG Charter, BTG Policies and Procedures, funding application strategies, HMIS enhancements, and refining the coordinated entry system in each county.

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

Sort	Agency/ Group/ Organization	Agency / Group / Organization / Type	What Section of the Plan was addressed by Consultation?	Action
1		<input checked="" type="checkbox"/> Housing <input checked="" type="checkbox"/> PHA <input checked="" type="checkbox"/> Services - Housing <input checked="" type="checkbox"/> Services – Children <input checked="" type="checkbox"/> Services – Elderly Persons <input checked="" type="checkbox"/> Services – Persons with Disabilities <input checked="" type="checkbox"/> Services – Victims of Domestic Violence <input checked="" type="checkbox"/> Services – Homeless <input checked="" type="checkbox"/> Services – Health <input checked="" type="checkbox"/> Services – Education <input checked="" type="checkbox"/> Services – Employment <input checked="" type="checkbox"/> Services – Fair Housing <input type="checkbox"/> Services – Victims <input checked="" type="checkbox"/> Services – Health Agency <input type="checkbox"/> Services – Child Welfare Agency <input type="checkbox"/> Services – Publicly-Funded Institution/System of Care <input checked="" type="checkbox"/> Other Government – Federal <input checked="" type="checkbox"/> Other Government – State <input checked="" type="checkbox"/> Other Government – County <input type="checkbox"/> Other Government – Local <input type="checkbox"/> Regional Organization <input type="checkbox"/> Planning Organization <input checked="" type="checkbox"/> Business Leaders <input checked="" type="checkbox"/> Civic Leaders <input type="checkbox"/> Business & Civic Leaders <input type="checkbox"/> Other Optional Designation(s) <input type="checkbox"/> Community Dev. Fin. Institution <input type="checkbox"/> Foundation <input type="checkbox"/> Grantee Department <input type="checkbox"/> Major Employer	<input checked="" type="checkbox"/> Housing Need Assessment <input checked="" type="checkbox"/> Public Housing Need <input checked="" type="checkbox"/> Homeless Needs – Chronically Homeless <input checked="" type="checkbox"/> Homeless Needs – Families With Children <input type="checkbox"/> Homeless Needs – Veterans <input checked="" type="checkbox"/> Homeless Need - Unaccompanied Youth <input checked="" type="checkbox"/> Homelessness Strategy <input checked="" type="checkbox"/> Non-Homeless Special Needs <input checked="" type="checkbox"/> HOPWA Strategy <input checked="" type="checkbox"/> Market Analysis <input checked="" type="checkbox"/> Economic Development <input checked="" type="checkbox"/> Lead-Based Paint Strategy <input type="checkbox"/> Anti-Poverty Strategy <input type="checkbox"/> Other	

Sort	Agency/ Group/ Organization	Agency / Group / Organization / Type	What Section of the Plan was addressed by Consultation?	Action
		<input type="checkbox"/> Neighborhood Commission <input type="checkbox"/> Private Sector Banking/Financing		

Table 2 – Agencies, groups, organizations who participated

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 - Other local / regional / federal planning efforts

Narrative

County agencies, in collaboration with the local CoC chapters and service providers, contribute greatly to the plan to end homelessness in their jurisdictions. Major efforts are described in ESG Attachment A, County Plans to Address Homeless and Other Special Needs Populations and Partner Agencies (Facilities and Services).

AP-12 Participation - 91.115, 91.300(c)

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

In developing the PY2019 Annual Action Plan, a series of public hearings were held in each of the counties to solicit input on housing and homeless needs and priorities. Public hearing notices were published in regional newspapers and in the Honolulu Star-Advertiser (a newspaper of general circulation) in August and October, 2018. Public hearings were held in September and November 2018 in Kailua-Kona and Hilo (County of Hawaii), Wailuku (County of Maui), Lihue (County of Kauai), and in Honolulu (City and County of Honolulu). Each of the counties also held public hearings, first to gather input on the needs and priorities of the Consolidated Plan and PY2019 Annual Action Plan, and subsequently to accept public comment on their respective draft PY2019 Annual Action Plans. A summary of comments received at the hearings is shown in Table 4, below.

On March 22, 2019, HHFDC published a public notice to solicit comments through April 21, 2019 on the draft PY2019 Annual Action Plan. The public notice and copies of the draft Annual Action Plan were available for review at regional libraries, the county housing offices, the offices of DHS-BESSD and HHFDC, and on HHFDC's website at www.hawaii.gov/dbedt/hhfdc. Comments received during the 30-day public comment period will be reported in the final AAP.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted / broad community	Public hearings in each county were well-attended by members of the public, nonprofits, government agencies, council representatives, and interested parties.	Members of the public attending the public hearings provided the following comments: Affordable housing is needed in all counties, especially rental housing, both single-family and multi-family rental housing. The lack of affordable rental housing for families and seniors continues to be a major problem for Hawaii's residents. There is a need for affordable housing for people with special needs. There is a shortage of care homes in communities for people with intellectual or developmental disabilities. This population cannot access market-based homes and are at great risk for becoming homeless. Care homes exist predominantly in central or west Oahu but have wait lists of 10+ years. Care homes are scarce in Honolulu and east Honolulu. There is a need for permanent residential solutions (e.g., group homes and apartments) to support this population. The number of homeless people in the neighbor island counties appear to be increasing, even though the PIT homeless count indicates a decrease. More resources are needed for the chronically homeless and the mentally ill who are homeless. Youth aging out of foster care into homelessness is increasing as well. There is a need for emergency shelters for homeless families with children. Landlord education is needed, to increase the number of landlords participating in the Section 8 program. Many Section 8 vouchers are unused because there is a lack of available rental units, and landlords do not want to participate in the Section 8 program. Landlord education could explain how Section 8 benefits the landlord in terms of guaranteed and on-time payments. Tenant education is needed too, so that tenants can maintain their units.		
2	News-paper Ad	Non-targeted / broad community		Comments received on the draft AAP will be included in the final AAP.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

HHFDC and its neighbor island partners will use the annual HOME allocation to promote decent, affordable housing, strengthen communities, and increase homeownership opportunities. HOME funds may be used for the construction of new or rehabilitation of existing affordable rental housing and for-sale housing, for tenant based rental assistance, for the development of transitional housing for the homeless, provide development funds for affordable homeownership projects using a self-help building method, provide downpayment/closing cost assistance and gap loans through various county homebuyer loan programs, and provide homebuyer education and counseling sessions. HOME program income may be used for HOME-eligible activities. The County of Kauai intends to use HOME program income for the Pua Loke Affordable Housing Development project. The County of Hawaii estimates receiving approximately \$50,000 in HOME program income which, if received, will be used for its Tenant Based Rental Assistance program; the County of Maui doesn't anticipate receiving program income but if received will be used for the Kahoma Residential Subdivision, an affordable self-help homeownership project.

DHS-BESSD/HPO and its partners will strengthen communities through its use of annual ESG and HOPWA funds. ESG will be used for operations funding for emergency shelters, and for homelessness prevention and rapid re-housing activities. HOPWA funds will be used to provide housing information and rent/deposit assistance services and support services, and to fund a portion of the market rental unit costs for homeless and homeless-at-risk persons with HIV/AIDS.

HHFDC will continue implementation of HUD's HTF program in PY2019, and anticipates the receipt of \$3,000,000, the state minimum under the HTF program for PY2019. Given the low funding levels for Hawaii, HHFDC will focus its HTF solely on rental housing activities for households with incomes at or below 30% AMI. After retaining 5% of the allocation for administration, HHFDC will allocate 50% annually to the City and County of Honolulu. The remaining 50% will be rotated between the three neighbor island counties on the same rotation being implemented for the HOME program. For PY2019, since the County of Kauai is scheduled to receive the HOME allocation, it will receive the neighbor islands' PY2019 HTF allocation as well.

Anticipated Resources

Pro-gram	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	3,008,138	0	0	3,008,138	3,000,000	The County of Kauai (CoK) will receive the PY2019 HOME allocation and plans to use it to fund its Pua Loke affordable rental housing project and its administration of the HOME program. CoK is in the process of soliciting a PY2019 CHDO activity and intends to utilize its CHDO funds for an affordable homeownership project in Waimea to provide approximately 10 affordable home ownership units. Once identified, the PY2019 AAP will be amended to include the selected CHDO activity. The County of Kauai anticipates using PI for its Pua Loke Affordable Housing Development. The County of Hawaii anticipates receiving approximately \$50,000 in HOME program income which, if received, will be used for its TBRA program. The County of Maui doesn't anticipate program income but, if received, will utilize it for its Kahoma Residential Subdivision, a self-help home ownership project in Lahaina.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	258,770	0	0	258,770	258,770	HOPWA funds will be utilized for tenant based rental assistance, short term rent, mortgage, utility assistance, supportive services, housing placement and administrative costs.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	437,933	0	0	437,933	437,933	ESG funds will be utilized for shelter operation costs and homelessness prevention and rapid re-housing activities, including rent, security deposit and utility assistance, and support services.

Pro-gram	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	0	0	3,000,000	3,000,000	After retaining 5% for administration, HHFDC will allocate 1/2 of the remaining PY2019 HTF to the County of Kauai, which intends to use HTF funds for its administration of the HTF program and for its Pua Loke Affordable Housing Development project. The City & County of Honolulu will receive the other 1/2 of the PY2019 HTF allocation and is in the process of soliciting an eligible activity to use these funds. It anticipates using its HTF funds in the downtown Honolulu or east Honolulu areas to provide approximately 7 affordable rental housing units for extremely low-income families. The City will also use its HTF for administration of the program.
Continuum of Care	public - federal	Permanent housing in facilities Permanent housing placement Rental Assistance Services Supportive services TBRA	0	0	0	0	0	In 2018, DHS requested HUD's approval to change the Continuum of Care (CoC) grant recipients from the DHS to each applicable provider. As the CoC for Hawaii, Kauai and Maui counties, the BTG Board approved this change. BTG understood that this request to change recipients would ultimately result in the providers becoming the direct grantees of HUD, rather than sub-recipients of DHS. The request was subsequently approved by HUD and grant amendments were processed and completed.
Other	public - state	Financial Assistance Permanent housing placement Rental Assistance Services	2,400,000	0	0	2,400,000	2,400,000	The State will provide funds through its Housing Placement Program to assist eligible families and housing voucher holders to secure and retain permanent housing.
Other	public - state	Financial Assistance Permanent housing placement Supportive services	500,000	0	0	500,000	500,000	Contracted agencies will provide emergency grants to benefit homeless and at-risk individuals and/or families to obtain or retain housing. Assistance includes rental deposits, rents, utility deposits and costs, and immediate needs such as food/supplies, medical needs, child and dependent care costs.

Pro-gram	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: \$		
Other	public - state	Overnight shelter Permanent housing placement Rapid re-housing (rental assistance) Services Supportive services Other	2,200,000	0	0	2,200,000	2,200,000	The State Homeless Outreach Program contracts with various agencies to provide comprehensive geographic coverage of the State's four counties Oahu, Maui, Kauai and Hawaii.
Other	public - state	Overnight shelter Permanent housing placement Services Short term or transitional housing facilities	13,500,000	0	0	13,500,000	13,500,000	Contracted agencies for emergency and/or transitional shelters provide a secure environment where homeless individuals and families can stabilize their lives, address their needs and strengthen their economic situation.
Other	public - state	Permanent housing placement Rental Assistance Services Supportive services	1,500,000	0	0	1,500,000	1,500,000	Following the Housing First approach, rural county agencies will provide services and financial assistance for those who are unsheltered, most vulnerable, and chronically homeless to move into sustainable, permanent housing with necessary support services to maintain housing and prevent recidivism back into homelessness.
Other	public - state	Rapid re-housing (rental assistance) Services Supportive services	1,500,000	0	0	1,500,000	1,500,000	The State's Rapid Re-housing Program requires contracted agencies to provide services and financial assistance that will enable individuals or families residing in emergency or transitional shelters who have been assessed and determined to be housing ready to live independently in affordable market rental units.

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

HOME program funds may be used for TBRA and to assist in the development of affordable rental housing and affordable homeownership housing. Projects utilizing HOME funds have historically leveraged HOME to secure other state and federal funding such as USDA, Low-Income Housing Tax Credits, and Rental Housing Revolving Funds, in addition to forgone taxes, fees and charges. It is anticipated that projects will continue to seek other local, state and federal funding to satisfy the matching funds requirement of the HOME program; the State Recipients have banked more than \$27.8M in match as of 06/30/2018.

To satisfy the anticipated matching funds requirement under the ESG program, DHS/HPO will provide state funds to agencies in the Counties of Hawaii, Kauai and Maui by contracting for services under the State Homeless Shelter Program, Outreach, Emergency Grants Programs, Housing First, Rapid Re-housing and State TANF funded Housing Placement Program.

Given the extremely low-income households targeted by HHFDC's HTF program, it is anticipated that HTF activities will be used in projects leveraging other funds, such as HHFDC's Low-Income Housing Tax Credits or Rental Housing Revolving Funds.

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

n/a

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HP-1 Emergency Shelter Operations	2015	2019	Homeless	Rural Counties	Coordinated Entry System Rapid Re-housing Transition to Permanent Housing Unsheltered Homeless	ESG: \$138,807 State Homeless Shelter Program: \$3,444,715	Homeless Person Overnight Shelter: 1760 Persons Assisted
2	HP-2 Domestic Violence Emergency Shelter	2015	2019	Non-Homeless Special Needs	Rural Counties	Coordinated Entry System Victims of Domestic Violence	ESG: \$25,855	Other: 620 Other
3	HP-3 HOPWA Support Services	2015	2019	Non-Homeless Special Needs	Rural Counties	Services for Persons with HIV/AIDS	HOPWA: \$51,556	Public service activities other than Low/Moderate Income Housing Benefit: 480 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	HP-4 Transition to Permanent Housing	2015	2019	Homeless	Rural Counties	Coordinated Entry System Transition to Permanent Housing Unsheltered Homeless Victims of Domestic Violence	ESG: \$164,662 Housing First Program: \$1,500,000 Housing Placement Program: \$1,000,000	Other: 360 Other
5	HP-4a Rapid Re-housing Financial Assistance	2015	2019	Homeless	Rural Counties	Coordinated Entry System Rapid Re-housing Transition to Permanent Housing Unsheltered Homeless Victims of Domestic Violence	ESG: \$147,707 State Rapid Re-housing Program: \$411,373	Tenant-based rental assistance / Rapid Rehousing: 56 Households Assisted
6	HP-4b Rapid Re-housing Support Services	2015	2019	Homeless	Rural Counties	Coordinated Entry System Rapid Re-housing Unsheltered Homeless Victims of Domestic Violence	ESG: \$46,124 State Rapid Re-housing Program: \$376,450	Tenant-based rental assistance / Rapid Rehousing: 81 Households Assisted
7	HP-4c Homelessness Prevention Financial Assistance	2015	2019	At Risk of Homelessness	Rural Counties	Coordinated Entry System Homelessness Prevention	ESG: \$36,962 State Homeless Emergency Grants Program: \$500,000 State Rapid Re-housing Program: \$274,249	Homelessness Prevention: 30 Persons Assisted
8	HP-4d Homelessness Prevention Support Services	2015	2019	At Risk of Homelessness	Rural Counties	Homelessness Prevention	ESG: \$16,202 State Rapid Re-housing Program: \$184,300	Homelessness Prevention: 30 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	HP-4e Homeless Management Information System	2015	2019	Homeless Non-Homeless Special Needs	Rural Counties	Coordinated Entry System HIV/AIDS Housing Assistance Homelessness Prevention Rapid Re-housing Services for Persons with HIV/AIDS Transition to Permanent Housing Unsheltered Homeless	ESG: \$4,379	Other: 0 Other
10	HP-5 HOPWA Housing Financial Assistance	2015	2019	Non-Homeless Special Needs	Rural Counties	Coordinated Entry System Services for Persons with HIV/AIDS Transition to Permanent Housing	HOPWA: \$181,951	Tenant-based rental assistance / Rapid Rehousing: 16 Households Assisted Other: 18 Other
11	HP-6 Administration	2015	2019	Homeless Non-Homeless Special Needs	Rural Counties	HIV/AIDS Housing Assistance Homelessness Prevention Rapid Re-housing Services for Persons with HIV/AIDS Transition to Permanent Housing Unsheltered Homeless Victims of Domestic Violence	HOPWA: \$25,263 ESG: \$21,897	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	HP-7 Coordinated Entry System	2015	2019	Homeless Non-Homeless Special Needs	Rural Counties	Coordinated Entry System HIV/AIDS Housing Assistance Homelessness Prevention Rapid Re-housing Services for Persons with HIV/AIDS Transition to Permanent Housing Unsheltered Homeless Victims of Domestic Violence	ESG: \$0 Continuum of Care: \$0 Housing First Program: \$7,416 Housing Placement Program: \$3,955 State Homeless Emergency Grants Program: \$989 State Homeless Shelter Program: \$13,625 State Outreach Program: \$6,658 State Rapid Re-housing Program: \$4,944	Other: 1800 Other
13	HR-1 New Construction/Rehab - Rental Hsg	2018	2019	Affordable Housing	Rural Counties	Rental Housing	HOME: \$2,256,104	Rental units constructed: 6 Household Housing Unit
14	HA-1 Program Administration	2015	2019	Administration	Rural Counties Statewide	Fair Housing Planning and Administration	HOME: \$300,813 HTF: \$300,000	Other: 0 Other
15	HR-4 New Construction/Rehab - Rental Housing	2016	2019	Affordable Housing	Statewide	Rental Housing	HTF: \$2,700,000	Rental units constructed: 11 Household Housing Unit
16	HR-2 Tenant Based Rental Assistance	2015	2019	Affordable Housing	Rural Counties	Rental Housing	HOME: \$50,000	Tenant-based rental assistance / Rapid Rehousing: 2 Households Assisted
17	HO-2 Self Help Housing	2015	2019	Affordable Housing	Rural Counties	Affordable Homeownership Opportunities	HOME: \$451,221	Homeowner Housing Added: 10 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	HP-1 Emergency Shelter Operations
	Goal Description	The State also provides funding for rural county shelters through the State Shelter Program. Contracted agencies provide secure environments where homeless individuals and families can stabilize their lives, address their needs and strengthen their economic situations. Of the Statewide total of \$13,500,000, the rural counties receive approximately \$2,900,000.
2	Goal Name	HP-2 Domestic Violence Emergency Shelter
	Goal Description	Provide operations funding to emergency shelters for victims of domestic violence in the counties of Hawaii, Kauai and Maui.
3	Goal Name	HP-3 HOPWA Support Services
	Goal Description	Persons with HIV/AIDS need services to achieve housing stability. Provide housing information and rent/deposit assistance and other supportive services to persons with HIV/AIDS in the counties of Hawaii, Kauai and Maui.
4	Goal Name	HP-4 Transition to Permanent Housing
	Goal Description	The homeless are not able to find affordable rentals. Agencies funded by ESG Shelter Operations will include transitioning homeless persons to permanent housing as an integral activity (Hawaii, Kauai and Maui). The State has provided Housing First funding (\$1.5 million) to the rural counties. This unprecedented effort reflects the State's priority on permanent housing for chronically homeless individuals and families. Existing programs such as the State Housing Placement Program allocated \$1 million for the neighbor islands.
5	Goal Name	HP-4a Rapid Re-housing Financial Assistance
	Goal Description	Rapid Re-housing (RRH) funds will provide financial assistance to individuals and families who lack a fixed, regular and adequate nighttime residence to achieve housing stability in permanent housing. Sixty percent of the ESG HPRP funding will be allocated to RRH. In addition, the State has provided RRH funds (\$1.5 million) to the rural counties. The State program will provide financial assistance and support services for at-risk and homeless individual and families utilizing a Housing First approach. In alignment with the ESG HPRP, the State anticipates that it will allocate 60% of the total funds to RRH and 40% to prevention. Of the approximately \$900,000 dedicated to RRH, an estimated 60% will be allocated to financial assistance as indicated on the Funding Allocated table.
6	Goal Name	HP-4b Rapid Re-housing Support Services
	Goal Description	Rapid Re-housing (RRH) funds will provide housing relocation and stabilization services (case management, housing search and placement, legal services, landlord mediation, etc.) to achieve housing stability in permanent housing. In addition, the State has provided RRH funds (\$1.5 million) to the rural counties. The State program will provide financial assistance and support services for at-risk and homeless individual and families utilizing a Housing First approach. In alignment with the ESG HPRP, the State anticipates that it will allocate 60% of the total funds to RRH and 40% to prevention. Of the approximately \$900,000 dedicated to RRH, an estimated 40% will be allocated to support service activities (estimated amount indicated below).

7	Goal Name	HP-4c Homelessness Prevention Financial Assistance
	Goal Description	ESG HPRP funding helps prevent homelessness by providing eligible housing-related financial assistance to persons and families at risk of homelessness. In addition, the State has provided RRH funds (\$1.5 million) to the rural counties, which includes a Prevention component. The State program will provide financial assistance and support services for at-risk and homeless individuals and families utilizing a Housing First approach. In alignment with the ESG HPRP, the State anticipates that it will allocate 60% of the total funds to RRH and 40% to Prevention. Of the approximately \$600,000 dedicated to Prevention, an estimated 60% will be allocated to financial assistance (as indicated below). The State also funds \$500,000 for the State Homeless Emergency Grants (SHEG) program in which contracted agencies provide emergency grants to obtain or retain housing. Assistance includes rental and utility deposits and costs and immediate needs including food, supplies, child and dependent care costs.
8	Goal Name	HP-4d Homelessness Prevention Support Services
	Goal Description	ESG HPRP funds will assist in preventing homelessness by providing housing relocation and stabilization services (i.e., case management, legal services, mediations, etc.). In addition, the State has provided RRH funds (\$1.5 million) to the rural counties, which includes a Prevention component. The State program will provide financial assistance and support services for at-risk and homeless individuals and families utilizing a Housing First approach. In alignment with the ESG HPRP, the State anticipates that it will allocate 60% of the total funds to RRH and 40% to prevention. Of the approximately \$600,000 dedicated to Prevention, an estimated 40% will be allocated to support service activities as indicated on the Funding Allocated table.
9	Goal Name	HP-4e Homeless Management Information System
	Goal Description	Funding for the administration and operation of the Homeless Management Information System (HMIS).
10	Goal Name	HP-5 HOPWA Housing Financial Assistance
	Goal Description	Provide funds to pay a portion of the market rental unit costs of homeless and persons at risk of homelessness with HIV/AIDS through: <ul style="list-style-type: none"> • Tenant based rental assistance (TBRA) - 16 households targeted for assistance • short-term rent, mortgage, utility (STRMU) - 10 households targeted for assistance • Permanent Housing Placement (PHP) - 8 households targeted for assistance
11	Goal Name	HP-6 Administration
	Goal Description	Ensure appropriate, effective and efficient use of ESG and HOPWA funds.
12	Goal Name	HP-7 Coordinated Entry System
	Goal Description	Agencies funded by ESG and HOPWA will utilize VI-SPDAT, a common assessment tool to ensure those with greatest needs are prioritized for assistance.
13	Goal Name	HR-1 New Construction/Rehab - Rental Hsg
	Goal Description	Rental housing for low-income households is a high priority need. HOME funds will be used with other rental housing development resources to increase the inventory of rentals for this target population. It is anticipated that PY2019 HOME funds will be used for the development of six affordable rental housing units.
14	Goal Name	HA-1 Program Administration
	Goal Description	HOME and HTF funds will be used to support the provision of effective program administration.

15	Goal Name	HR-4 New Construction/Rehab - Rental Housing
	Goal Description	Rental housing for extremely low-income households is a high priority need. HTF funds will be used with other resources to increase the inventory of affordable rentals for this target population. It is anticipated that \$2,700,000 in PY2019 HTF funds will be used in the County of Kauai and the City and County of Honolulu for their development of approximately 11 affordable rental housing units serving households with incomes at or below 30% AMI.
16	Goal Name	HR-2 Tenant Based Rental Assistance
	Goal Description	Tenant Based Rental Assistance is a high priority need. The County of Hawaii anticipates receiving HOME program income of approximately \$50,000 which, if received, will be used by the County of Hawaii for its TBRA program to assist two low- and very low-income households by subsidizing their rent payments, similar to the Housing Choice Voucher (Section 8) program.
17	Goal Name	HO-2 Self Help Housing
	Goal Description	Affordable for sale units are a high priority need. HOME funds may be used to construct new affordable for-sale housing, or for the acquisition/rehabilitation of existing affordable for-sale housing, using a self-help building method. The County of Kauai is in the process of soliciting an eligible CHDO activity and intends to utilize HOME CHDO funds for the development of affordable self-help homeownership housing in Waimea; these funds may provide an estimated ten homeownership units for low-income families.

Table 7 – Goal Descriptions

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The State's HOME, ESG, and HOPWA funds will be used in the Counties of Hawaii, Kauai and Maui, to address the priority needs and objectives identified in the State's ConPlan. Although most projects and activities will benefit areas of minority concentration, funds will not be specifically targeted for that sole purpose. HHFDC gives preference in the allocation of its HOME funds to the counties of Hawaii, Kauai and Maui, as "State Recipients," under an annual rotation between the three counties. The County of Kauai will receive HOME funds for PY2019.

State Recipients do not allocate their HOME funds based on geographic areas. Generally, HOME funds are allocated through a Request for Proposal or application process, which ranks and rates projects for program eligibility, need, and meeting the ConPlan priorities, objectives, and performance measures. Should a State Recipient choose not to (or, based on the HHFDC's determination, is unable to) administer their HOME program funds, HHFDC may directly administer the funds or reallocate funds to other State Recipients. Any HOME funds returned to HHFDC, whether declined, released or recaptured, will be placed in eligible projects which best meet the HOME priority needs and objectives in the following order of priority: 1. Re-allocated to a State Recipient other than the one from which the funds are being released or recaptured; 2. Awarded through a competitive selection process, with preference given to projects located outside of the City and County of Honolulu; or 3. Invested in a HHFDC project located throughout the State.

HHFDC permits its State Recipients to accumulate PI, repayments and recaptured funds, in accordance with the HOME Interim final rule (Federal Register 81 No. 232 December 2, 2016), and to use these funds in eligible activities. Should HOME funds become available from cancelled or completed projects, or through the receipt of program income, such funds may be reprogrammed to any open HOME-

assisted Action Plan project in accordance with the State's Citizen Participation Plan.

HHFDC's HTF funds may be allocated in all four counties for rental housing activities serving households with incomes at or below 30% of the area median income. After retaining 5% of the annual allocation for administration, HHFDC will allocate 50% of the balance to the City and County of Honolulu, and rotate the remaining 50% to one of the neighbor island counties, in accordance with the HOME rotation. For PY2019, the County of Kauai will receive the HOME allocation, so it will receive 50% of the PY2019 HTF allocation as well. Should a designated county be unable to identify an eligible HTF activity and/or complete the tasks to meet the commitment requirements within a specified timeframe, HHFDC, in its sole discretion, shall seek alternate activities from the remaining three counties. Should the remaining three counties be unable to identify an eligible HTF activity and /or complete the tasks to meet the commitment requirements within a specified timeframe, HHFDC, in its sole discretion, shall seek alternate activities directly from eligible recipients.

DHS-BESSD's Homeless Programs Office (HPO) receives annual formula allocations of the ESG and HOPWA grants, and administers both programs for the counties of Hawaii, Kauai and Maui. In PY2019, the State anticipates receiving \$437,933 in ESG funds, to meet the Consolidated Plan objectives of strengthening communities and promoting decent affordable housing. In addition, the State anticipates receiving \$258,770 in HOPWA funds which will be utilized to promote decent, affordable housing and suitable living environments for persons with HIV/AIDS.

Funding Allocation Priorities

	HP-1 Emergency Shelter Operations (%)	HP-2 Domestic Violence Emergency Shelter (%)	HP-3 HOPWA Support Services (%)	HP-4 Transition to Permanent Hsg (%)	HP-4a Rapid Re-housing Financial Assistance (%)	HP-4b Rapid Re-housing Support Services (%)	HP-4c Homelessness Prevention Financial Assistance (%)	HP-4d Homelessness Prevention Support Services (%)	HP-4e Homeless Management Information System (%)	HP-5 HOPWA Hsg Financial Assist. (%)	HP-6 Administration (%)	HP-7 Coordinated Entry System (%)	HR-1 New Constr/Rehab - Rental Hsg (%)	HA-1 Program Administration (%)	HR-4 New Constr/Rehab - Rental Hsg (%)	HR-2 Tenant Based Rental Assistance (%)	HO-2 Self Help Housing (%)	Total (%)
HOME	0	0	0	0	0	0	0	0	0	0	0	0	74	10	0	1	15	100
HOPWA	0	0	20	0	0	0	0	0	0	70	10	0	0	0	0	0	0	100
ESG	32	6	0	10	30	8	2	2	1	0	7	2	0	0	0	0	0	100
HTF	0	0	0	0	0	0	0	0	0	0	0	0	0	10	90	0	0	100
Continuum of Care	0	0	0	86	0	0	0	0	4	0	7	3	0	0	0	0	0	100
Other Housing First Program	0	0	0	60	0	25	0	0	3	0	10	2	0	0	0	0	0	100
Other Housing Placement Program	0	0	0	0	27	28	18	18	2	0	6	1	0	0	0	0	0	100
Other State Homeless Emergency Grants Program	0	0	0	0	30	25	20	17	1	0	6	1	0	0	0	0	0	100

	HP-1 Emergency Shelter Operations (%)	HP-2 Domestic Violence Emergency Shelter (%)	HP-3 HOPWA Support Services (%)	HP-4 Transition to Permanent Hsg (%)	HP-4a Rapid Re-housing Financial Assistance (%)	HP-4b Rapid Re-housing Support Services (%)	HP-4c Homelessness Prevention Financial Assistance (%)	HP-4d Homelessness Prevention Support Services (%)	HP-4e Homeless Management Information System (%)	HP-5 HOPWA Hsg Financial Assist. (%)	HP-6 Administration (%)	HP-7 Coordinated Entry System (%)	HR-1 New Constr/Rehab - Rental Hsg (%)	HA-1 Program Administration (%)	HR-4 New Constr/Rehab - Rental Hsg (%)	HR-2 Tenant Based Rental Assistance (%)	HO-2 Self Help Housing (%)	Total (%)
Other State Homeless Shelter Program	44	4	0	19	9	9	0	0	3	0	9	3	0	0	0	0	0	100
Other State Outreach Program	40	5	0	20	3	10	0	0	7	0	5	10	0	0	0	0	0	100
Other State Rapid Re-housing Program	0	0	0	0	38	17	26	11	1	0	6	1	0	0	0	0	0	100

Table 8 – Funding Allocation Priorities

Reason for Allocation Priorities

Testimony at public hearings supports the need for affordable housing, both rental and homeownership, statewide. HHFDC's 2016 Hawaii Housing Planning Study cited the need for more than 64,600 housing units statewide by 2025. Of these, more than 43,800 housing units will be needed for families earning 80% or less of the area median income. The HOME program may fund affordable rental units for families and special needs populations, tenant based rental assistance, affordable homeownership opportunities, county homebuyer loan programs, and homebuyer education, all serving families with incomes of 80% or less AMI.

The Continuum of Care (CoC) for the rural counties, Bridging the Gap (BTG), and the DHS/HPO have determined that Emergency Solutions Grant funds for PY2019 will be allocated at approximately one percent for Homeless Management Information System (HMIS) costs and allowable five percent for administrative fees for DHS/HPO. BTG elected to allocate the remaining ESG grant funds by apportioning forty percent (40%) to emergency shelter operations and sixty percent (60%) to homelessness prevention and rapid re-housing activities. Within the HPRP component, approximately forty percent (40%) will be apportioned to homeless prevention and sixty percent (60%) to rapid re-housing. This allocation formula reflects the CoC's deep commitment to providing financial assistance and support services to retain or obtain permanent housing. Preference will be given to rapid re-housing activities targeted to individuals and families living on the street or in shelters. Homelessness prevention and rapid re-housing activities include financial assistance for rents, security deposit and utilities, and housing relocation and stabilization services. Agencies that are awarded funding will be allowed a maximum of 2.5% in administrative fees.

One hundred percent (100%) of the ESG funds for emergency shelters will be allocated to operational costs. These funds are instrumental in supplementing the State's Shelter Program grants. The State has revised its contractual requirements for agencies providing emergency shelters in an effort to reflect a

Housing First modality. For example, tracking the length of stay for clients, promoting (and eventually incentivizing) shorter lengths of stay, focusing services on permanent housing and housing stability as the goal.

One provider will serve as a centralized administrative agency to provide HOPWA-funded activities, such as tenant-based rental assistance (TBRA), short-term rental, mortgage and utility (STRMU) payments, permanent housing placement, and supportive services, for persons living with HIV/AIDS in the Counties of Hawaii, Kauai and Maui. Maui AIDS Foundation will serve as the lead agency and sponsor in collaboration with Malama Pono and Hawaii Island HIV/AIDS Foundation. The State will retain three percent (3%) of the grant for administration. Of the remainder, approximately seventy-two percent (72%) of the funds will be allocated to financial assistance for housing through TBRA, STRMU, and permanent housing placement support. Roughly twenty-one percent (21%) of the funds will be allocated to supportive services, and seven (7%) for the agency's administrative costs. This apportionment reflects the priority of permanent housing through prevention and rapid re-housing assistance.

HHFDC plans to allocate its HTF funds to the counties, as Subgrantees. Unlike the HOME program, the City and County of Honolulu will not receive its own allocation of HTF; therefore, after retaining 5% for administration, HHFDC plans to annually subgrant 50% to the City and County of Honolulu, and rotate the remaining 50% between the Counties of Hawaii, Kauai and Maui, to coincide with the HOME rotation. The County of Kauai will receive the PY2019 HTF neighbor island allocation. HHFDC's PY2019 HTF Allocation Plan is shown in HTF Attachment A.

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

In accordance with HHFDC's annual rotation, its PY2019 HOME funds will be distributed to the County of Kauai (CoK). CoK will use \$2,256,104 for affordable rentals in the Pua Loke Affordable Housing project and \$150,406 for its administration of the HOME program. CoK was initially unable to identify an eligible CHDO activity for PY2019, but has since issued a new solicitation for eligible CHDO activities. CoK intends to utilize HOME CHDO funds for the development of affordable homeownership housing units using the self-help building method in Waimea. Once selected, the PY2019 AAP will be amended to include the CHDO activity.

In PY2019, CoK intends to use HOME program income for its Pua Loke project. The County of Hawaii anticipates HOME program income of approximately \$50,000 which, if received, will be used for its TBRA program. The County of Maui does not anticipate receiving program income, but any received will be used for its Kahoma Residential project in Lahaina, currently under construction. HHFDC will retain five percent (\$150,407) for its HOME administration.

HHFDC will continue to administer HTF in PY2019 and focus these funds on the development and preservation of affordable rental housing in all four counties for extremely low-income households. For PY2019, HHFDC will retain 5% for HTF administrative costs, distribute 50% of the remaining balance to the City and County of Honolulu, and the final 50% to the CoK.

One of the State's objectives in expending ESG funds is to strengthen communities through homelessness prevention at risk of homelessness and rapid re-housing activities targeted to individuals and families living on the streets or in homeless shelters. Under a Request for Interest (RFI) process, the DHS-BESSD/HPO awarded approximately \$246,994 in anticipated ESG funds to agencies to provide homelessness prevention and rapid re-housing activities in the neighbor island counties of Hawaii, Kauai and Maui.

The remaining anticipated ESG funds of approximately \$164,663 will be used for operations of

emergency shelters for the unsheltered homeless and victims of domestic violence. To achieve DHS-BESSD/HPO's second objective of promoting decent, affordable housing, providers will include transitioning homeless persons to permanent housing as an integral activity. The State will retain one percent (approximately \$4,379) for HMIS, and five percent (\$21,896) for its administrative costs.

The State anticipates receiving approximately \$258,770 in HOPWA funds for PY2018. HOPWA funds will both strengthen communities and promote decent, affordable housing by providing housing information, rent or deposit assistance, and other supportive services to persons with HIV/AIDS who are homeless or at risk of homelessness.

In collaboration with BTG, DHS-BESSD/HPO issues an RFI for one provider to serve as a centralized administrative agency to provide HOPWA-funded activities, such as TBRA, short-term rental, mortgage and utility payments (STRMU), permanent housing placement, and supportive services, for persons living with HIV/AIDS in the Counties of Hawaii, Kauai and Maui.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

The State's HHFDC administers the HOME and HTF programs. The state's Homeless Programs Office of the Department of Human Services - Benefits, Employment and Support Services Division (HPO) administers the ESG and HOPWA programs.

The City and County of Honolulu (City) receives its own allocations of HOME, ESG and HOPWA, so HHFDC and HPO distribute the state's HOME, ESG and HOPWA funds to the neighbor island counties of Hawaii, Kauai and Maui through their respective processes. The City does not receive a HTF allocation, so HHFDC allocates a part of its HTF funds to the City as well as the neighbor island counties.

Distribution Methods

1	State Program Name:	HAWAII
	Funding Sources:	HOPWA HOME ESG HTF

	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>HHFDC distributes its HOME allocation annually on a rotating basis between the counties of Hawaii, Kauai and Maui. In prior years, the three neighbor island counties annually received a pro-rated share of the HOME allocation, requiring them to "save up" before enough funds were available to proceed. This resulted in slow or delayed expenditures of HOME funds, and "red flags" from HUD. To address the issue, HHFDC instituted a rotation of the annual allocation between the three neighbor island counties. The County of Kauai will receive the PY2019 HOME allocation, the County of Maui will receive it in PY2020, and the County of Hawaii will receive it in PY2021. HHFDC will retain 5% of the HOME allocation for program administration, and 15% will be set aside for CHDO activities in the designated county.</p> <p>Under the HTF program, HHFDC will focus its resources on rental housing activities serving households with incomes at or below 30% AMI. After retaining 5% of the allocation, HHFDC will annually distribute 50% of the balance to the City and County of Honolulu, and rotate the remaining balance of 50% to one of the neighbor island counties, as Subgrantees, on the same rotation as HHFDC's HOME funds. In PY2019, the County of Kauai will receive the HOME allocation, so it will also receive the neighbor island share of 50% of the HTF allocation. Pre-award costs will be allowed for planning activities and preparation of the HTF allocation plan of up to 5% of the minimum allocation amount of \$3M.</p> <p>The State's DHS/HPO annually issues a Request for Information (RFI) for its ESG and HOPWA program funds, soliciting providers to serve the Counties of Hawaii, Kauai and Maui. The RFI requires ESG and HOPWA applicants to submit work plans that identify clear goals, objectives and outcomes for the respective programs.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>HHFDC does not select applicants for the HOME program, but rotates its HOME funds to one of the three neighbor island counties, or State Recipients, who do. In general, State Recipients issue Requests for Proposals or applications in their county to solicit entities that can help meet its goals and objectives - the two main objectives are the development or preservation of affordable rental housing and affordable homeownership housing. Criteria generally used to select applicants include the housing need being met by the proposal, the applicant's specialized experience, capacity and budget reasonableness, the project's readiness to proceed, and a project's leveraging of other resources. HHFDC intends to annually subgrant its HTF funds to the City and County of Honolulu and one of the neighbor island counties (the County of Kauai for PY2019). Like HOME, HTF activities will be selected by the counties, using an RFP or other county-approved application process. Selection criteria includes factors such as timeliness, readiness to proceed, the extent to which an activity meets the priorities of the Consolidated Plan, developer experience and financial capacity, financial feasibility of the project, and leveraging.</p> <p>The CoC and HPO provide assistance to ESG recipients across all entitlement jurisdictions. DHS/HPO administers ESG funding procured through an objective RFI process on behalf of all rural chapters. Each local chapter is represented in the decision-making process through designated chairs and county government personnel on the BTG leadership team. Embedded in the RFI evaluation process is a number of performance criteria that aid the CoC in maximizing the ESG funding allocation, including BTG's emphasis on permanent housing and helping people quickly regain stability after experiencing a housing crisis. Additionally, ESG applicants are evaluated based on completeness of the application, experience, expenditure rates, monitoring findings, performance data, financial feasibility, CoC participation, and clear goals/objectives/outcomes. HMIS data and national best practices are being examined more frequently by the CoC to determine appropriate ESG funding allocations.</p> <p>The PY19 RFI required that services be provided in a manner that is consistent with a Housing First (HF) model. The RFI stated that providers shall support a low barrier approach to program entry and ongoing program participation by offering households immediate access to outreach, shelter, and permanent housing as appropriate without unnecessary prerequisites (i.e, sobriety, participation in services, etc.). In addition, providers were required to offer households experiencing homelessness ongoing access to services until they secure permanent housing by not establishing arbitrary time limits on length of program participation, and limiting program rules to a brief list of requirements that are necessary to ensure program participants' and staffs' health and safety. RFI applicants were also required to provide information that demonstrate its history of coordinating with the DHS and other agencies/community resources to meet the needs of the target population. Other RFI conditions included coordination of services through applicants' participation in their local Coordinated Entry System (CES), CoC, Point-in-Time Count, assisting in maintaining a current by-name list that includes all sheltered and unsheltered Homeless people, using the VI-SPDAT as determined by their CoC, and compliance with all CoC and CES final written standards, policies, and procedures.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The DHS posts a RFI on the State Procurement Office (SPO) website. Publication on a public website allows the State to reach a wide variety of interested stakeholders including nonprofit, private community and faith-based organizations. Additionally, the notice of publication is delivered through each local CoC chapter listserv. The RFI is created in such a way that does not preclude applications by providers that have no previous history of CoC funding. The RFI requires work plan forms to identify clear goals, objectives and outcomes for two distinct programs: ESG Shelter Operations and ESG Homelessness Prevention and Rapid Rehousing. Applications are competitive and evaluated by a team consisting of individuals with no conflict of interest, representing each of the three CoC county chapters and the State. In general, applications are scored based on the criteria listed above. The evaluation committee selects the awardees with satisfactory scores of 70% or higher. HPO submits a combined proposal on behalf of the ESG/HOPWA awardees through the related sections of the Annual Action Plan to the HHFDC. After a grant agreement is executed with HUD, DHS/HPO executes contracts with the selected provider agencies. The award list is posted on the SPO website as contracts are executed.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>The HOPWA RFI is simultaneously posted with the ESG RFI, and follows the same process. Eligible applicants (provider agencies) submit their project information in strict accordance to the RFI requirements within the specified deadline. Maui AIDS Foundation has been selected as the project sponsor and administrative lead for the counties of Hawaii, Maui and Kauai to provide services and assistance to persons with HIV/AIDS.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>HOME funds will be allocated by State Recipients, to eligible HOME activities in all categories. HTF funds will be allocated by HHFDC's Subgrantees, to eligible rental housing projects. BTG, in collaboration with DHS/HPO, elected to allocate the ESG grant by dedicating one percent (1%) to HMIS, five percent (5%) for State administrative costs, and apportioning the remaining 40% to ESG shelter operations and 60% to homelessness prevention and rapid re-housing (HPRP) activities. Within the HPRP program, funding is allocated at minimally 60% to rapid re-housing and 40% to homelessness prevention. These allocation decisions reflected BTG's greater emphasis on permanent housing and helping people quickly regain stability after experiencing a housing crisis. HOPWA funds will be dispersed in the counties of Hawaii, Kauai and Maui. Approximately 60% will be used for market rental unit costs for homeless and at-risk persons with HIV/AIDS, and roughly 30% for housing information and rent/deposit assistance services and other supportive services to persons with HIV/AIDS. The project sponsor receives 7%, and the State 3%, for administration of the programs.</p>

<p>Describe threshold factors and grant size limits.</p>	<p>In general, HHFDC's State Recipients under the HOME Program issue Requests for Proposals or applications to solicit eligible activities. Selected proposals are limited to the aggregate total that does not exceed the annual HOME allocation. Fifteen percent of the HOME allocation is set aside for Community Housing Development Organizations, and ten percent of the HOME allocation may be used for administration of the program. Each of the State Recipients establishes their threshold factors. Generally, proposals competing for HOME funds are evaluated on the extent to which a proposal meets the needs and objectives of the HOME program and community needs, experience and capacity of the applicant, and leveraging.</p> <p>Like the HOME program, HHFDC's Subgrantees under the HTF program will, in general, issue RFPs or applications to solicit eligible activities. Selected proposals are limited to the aggregate total that does not exceed the annual HTF allocation. Ten percent of the HTF allocation may be used for administration of the program. In selecting HTF activities, subgrantees will consider factors such as timeliness and readiness to proceed, the extent to which a proposal meets rental housing objectives for both the county and HHFDC; developer experience and capacity; financial feasibility; and use of non-federal funding sources.</p> <p>Limited, existing ESG and HOPWA awards are insufficient to meet demand. The CoC saw a reduction in both the total and unsheltered PY18 Point in Time (PIT) count for Hawaii, Kauai and Maui. Results from the 2018 Neighbor Islands Homeless PIT count conducted on January 22, 2018 revealed a 10 percent overall decrease in one-day homelessness from 2,261 persons in 2017 to 2,035 persons in 2018. The Neighbor Islands decrease was led by overall decreases on Hawaii (9%), Maui (3%), and Kauai (29%). The 2018 PIT overall decrease was fueled by a 10 percent decrease in unsheltered homelessness to 1,330 persons compared to 1,476 in 2017. Unsheltered homelessness declined on all three rural counties led by Kauai (37%), Maui (5%), and Hawaii (1%). This continues a two-year downward trend, using 2016 as the baseline year. The count of homeless persons living in emergency or transitional shelters decreased ten percent from 785 to 705 persons with reductions on Hawaii and Kauai, while Maui reported a slight increase. Despite the overall decrease, each county still faces huge challenges with the homeless population, and funding for ESG has not increased in proportion to need. DHS distributes funds throughout the neighbor island counties, generally based on need and population size. HOPWA funds are allocated based on geographic need, unmet housing needs, and the acuity levels of program participants. The HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) identifies multiple eligible households that have unmet housing subsidy assistance needs.</p>
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<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>HHFDC expects that the use of its HOME funds will produce or preserve affordable housing in the neighbor island counties, for both rentals and homeownership; provide affordable rentals under TBRA programs; provide transitional housing for homeless individuals and families; provide affordable homeownership opportunities under homebuyer loan programs, and promote homeownership through homebuyer education and counseling. HHFDC anticipates that its PY2019 HOME funds will be used in the County of Kauai to support the production of 50 new affordable rental units, six of which will be HOME-assisted, for families in the Pua Loke project. The County of Kauai is in the process of identifying its PY2019 CHDO activity and anticipates using its CHDO funds for the development of affordable for-sale units in Waimea. The County of Hawaii anticipates the receipt of program income of approximately \$50,000 which, if received, will assist two households with TBRA.</p> <p>Under its PY2019 HTF program, HHFDC will retain 5% of its allocation for administration, and distribute 50% of the balance to the City and County of Honolulu and the remaining 50% to the County of Kauai. The County of Kauai intends to use its PY2019 HTF to support four units serving households with incomes at or below 30% AMI, in its 50-unit Pua Loke project in Lihue. The City & County of Honolulu is in the process of soliciting an eligible PY2019 HTF activity and anticipates using its HTF funds to provide seven rental housing units in downtown Honolulu or the east Honolulu regions of Oahu that will serve households with incomes at or below 30% AMI (extremely low-income households).</p>
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Table 9 - Distribution Methods by State Program

Discussion:

AP-35 Projects – (Optional)

Introduction:

HOME funds may be used to provide decent, affordable housing and strengthen communities through the production and development of affordable rental housing, tenant-based rental assistance, and affordable homeownership opportunities and education. A summary of the PY2019 HOME funding and activities is attached as HOME Attachment A, PY2019 HOME Funds and Activities.

National Housing Trust Fund program funds will provide decent, affordable rental housing and strengthen communities through the production or preservation of affordable rental housing serving extremely low-income households. PY2019 HTF funds will be sub-granted to the County of Kauai and the City and County of Honolulu. The County of Kauai has identified its PY2019 HTF activities, subject to HUD's approval of its HTF Allocation Plans. The City and County of Honolulu is in the process of identifying its PY2019 HTF activity; the City anticipates that \$1,350,000 in PY2019 HTF will be used to provide seven affordable rental housing units in the downtown Honolulu or east Honolulu areas serving extremely low-income households with incomes at or below 30% AMI. Once the City selects its PY2019 HTF activity, the PY2019 AAP will be amended to include the activity. A summary of the PY2019 HTF funding and activities is attached as HTF Attachment B, HTF Funding and Activities.

The Emergency Solutions Grant was authorized by Section 1503 of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, signed into law on May 20, 2009. Formerly known as the Emergency Shelter Grant program, the program was re-named to signify a shift to permanent housing goals by funding homelessness prevention and rapid re-housing activities, in addition to emergency

shelters.

HOPWA funds will both strengthen communities and promote decent affordable housing by providing housing information, rent or deposit assistance, and other supportive services to persons with HIV/AIDS who are homeless or at risk of homelessness.

#	Project Name
1	ESG19 Hawaii
2	HOPWA19
3	HOPWA19 Hawaii DHS Admin
4	HOME 2019 - HHFDC Admin
5	HOME 2019 - Kauai County Admin
6	HOME 2019 - Pua Loke Affordable Housing Development
7	HOME 2019 - CHDO Activity, TBD
8	HTF 2019 - Pua Loke Affordable Housing Development
9	HTF 2019 - HHFDC Admin
10	HTF 2019 - Kauai County Admin
11	HTF 2019 - City and County of Honolulu Admin
12	HTF 2019 - City and County of Honolulu
13	HOME 2019 - TBRA

Table 10 – Project Information

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

Since the City and County of Honolulu receives its own HOME program allocation, HHFDC has elected to distribute the State's HOME funds in the neighbor island counties of Hawaii, Kauai, and Maui, on an annual rotating basis. HOME funds will be utilized to address the priority needs and objectives identified in the State's Consolidated Plan. The Counties of Hawaii, Kauai and Maui have assigned a high priority to housing for all types of households with incomes under 80% of the area median income. Such priorities include activities that expand or preserve the supply of safe, decent and sanitary affordable rental housing, particularly rental housing for very low- and low-income families and special needs populations. Priorities also include the provision of TBRA, new construction or acquisition and/or rehabilitation of housing for first-time homebuyers, and county homebuyer loan programs.

The State's HTF funds will focus on the production and preservation of affordable rental housing for extremely low-income (30% AMI) families, in all four counties including the City and County of Honolulu (Honolulu). PY2019 HTF funds will be sub-granted to the County of Kauai and the City and County of Honolulu for the production or preservation of affordable rental housing.

While emergency shelters continue to provide essential services, obtaining permanent housing for the homeless and retaining housing for at-risk individual and families feature prominently in BTG's decision to place more emphasis on ESG HPRP. Rapid re-housing and prevention activities include financial assistance for rents, security deposits and utilities, and housing relocation and stabilization services. BTG elected to allocate HPRP funds to one agency each in Maui, Kauai and Hawaii counties. ESG funds for each component (Shelter and HPRP) are distributed based on population ratios: Hawaii (50%); Maui (34%); and Kauai (16%). These ratios are followed as closely as possible, but the allocation is ultimately determined by the number of applicants who are selected from each county through the State's procurement process.

The Maui AIDS Foundation (MAF) is the HOPWA project sponsor/lead agency and will provide administrative management and accountability for the agencies which comprise the Neighbor Island

HIV/AIDS Coalition (NIHAC): Maui AIDS Foundation, Malama Pono (MP), Health Services (Kauai), and Hawaii Island HIV/AIDS Foundation (HIHAF). HOPWA funds were distributed equitably throughout the counties based on geographic need, unmet needs and acuity levels of individuals/households.

Major barriers in Hawaii include scarcity of living wage jobs and the overall high cost of living, especially for housing. Demand for affordable housing in the CoC jurisdictions exceeds the supply of such units making Hawaii one of the most expensive states in which to reside. Housing costs, for purchase or rent, are not reasonable for most middle income wage earners, much less for extremely low income persons who often have other challenges. Additionally, the lack of dependable public transportation in the rural counties makes client access to services and jobs more difficult.

AP-38 Project Summary

Project Summary Information

1	Project Name	ESG19 Hawaii
	Target Area	Rural Counties
	Goals Supported	HP-1 Emergency Shelter Operations HP-2 Domestic Violence Emergency Shelter HP-4 Transition to Permanent Housing HP-4a Rapid Re-housing Financial Assistance HP-4b Rapid Re-housing Support Services HP-4c Homelessness Prevention Financial Assistance HP-4d Homelessness Prevention Support Services HP-4e Homeless Management Information System HP-6 Administration HP-7 Coordinated Entry System
	Needs Addressed	Unsheltered Homeless Victims of Domestic Violence Transition to Permanent Housing Rapid Re-housing Homelessness Prevention Coordinated Entry System
	Funding	ESG: \$437,933 Continuum of Care: \$2,146,702 Housing First Program: \$1,500,000 Housing Placement Program: \$2,400,000 State Homeless Emergency Grants Program: \$500,000 State Homeless Shelter Program: \$13,500,000 State Outreach Program: \$2,200,000 State Rapid Re-housing Program: \$1,500,000
	Description	ESG Shelter Operations funds will be utilized for emergency shelter operation costs including maintenance/repair, food, security, supplies, utilities and insurance; shelter providers will include, as an integral part of their activities, transitioning homeless people into permanent housing. ESG HPRP funds will provide financial assistance and supportive services to prevent homelessness among at-risk individuals/families, and rapidly re-house those who are literally homeless and ensure stability after the ESG assistance ends. Five percent of ESG funds will be used for the State Department of Human Services' administrative costs, 2.5% for sub-recipients' administrative costs, and 1% will be utilized for the maintenance and operations of HMIS.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Shelter Operations: 1,760 homeless persons and 620 victims of domestic violence will be provided refuge and a safe place to sleep. ESG Rapid Re-housing: 56 homeless households will achieve housing stability with financial assistance for placement in permanent housing. 81 households will receive housing re-location and stabilization services. ESG Homelessness Prevention: 30 households will receive financial assistance to remain in their homes. 30 households will receive support services to remain in their homes.
	Location Description	ESG services will be provided in the counties of: Hawaii: Child and Family Services (Administrative Office), 91-1841 Fort Weaver Rd., Ewa Beach, HI, 96706; HOPE Services Hawaii, 296 Kilauea Kauai: Family Life Center Kauai (Administrative Office), 95 South Kane St., Kahului, HI, 96732. Maui: Family Life Center Maui (Administrative Office), 95 South Kane St., Kahului, HI, 96732; Ka Hale A Ke Ola Homeless Resource Centers, 670 Waiale Rd., Wailuku, HI, 96793.
	Planned Activities	Emergency Shelter Operations: ESG shelter funds will provide for operational costs including maintenance, utilities, security, food, supplies and insurance; and transitioning homeless people into permanent housing. Homelessness Prevention and Rapid Re-housing activities include financial assistance for short and medium term rents, security deposits and utilities; and housing relocation and stabilization services, including case management, outreach, housing search and placement, legal services, mediation and credit repair. The State will retain 1% for the Homeless Management Information System. The State will retain 5% for costs related to the effective administration of the ESG program, including overall program management, sub-recipient monitoring, fiscal oversight, and preparing reports and other documents for HUD.
2	Project Name	HOPWA19
	Target Area	Rural Counties
	Goals Supported	HP-3 HOPWA Support Services HP-4 Transition to Permanent Housing HP-5 HOPWA Housing Financial Assistance HP-6 Administration HP-7 Coordinated Entry System
	Needs Addressed	Services for Persons with HIV/AIDS HIV/AIDS Housing Assistance Planning and Administration
	Funding	HOPWA: \$251,008 ESG: \$437,933 Continuum of Care: \$2,146,702 Housing First Program: \$1,500,000 Housing Placement Program: \$2,400,000 State Homeless Emergency Grants Program: \$500,000 State Homeless Shelter Program: \$13,500,000 State Outreach Program: \$2,200,000
	Description	Provide tenant based rental assistance (TBRA); short term rental, mortgage and utility (STRMU); permanent housing assistance; and supportive services to those living with Human Immunodeficiency virus (HIV)/Acquired Immunodeficiency syndrome (AIDS).
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	<p>TBRA: Provide funds to pay a portion of the market rental unit costs for homeless and at-risk persons with HIV/AIDS, projected to serve 16 households.</p> <p>Short-term rent, mortgage and utility (STRMU): Provide short-term financial assistance, paid on the participant's behalf as an intervention to help households maintain their current housing to prevent homelessness, projected to serve 10 households.</p> <p>Permanent housing placement services: Provide housing information and financial assistance, including security deposits which may be used to help eligible persons establish a new residence where ongoing occupancy is expected to continue, projected to serve 8 households.</p> <p>Supportive Services: Provide supportive services such as health care accessibility, transportation, housing information, with or without housing activities, to those living with HIV/AIDS, projected to serve 450 households.</p>
	Location Description	<p>HOPWA funds will be utilized to serve the Counties of Hawaii, Kauai and Maui. Maui AIDS Foundation will serve as the lead agency and project sponsor: 1935 Main St., Suite 101, Wailuku, HI, 96793.</p> <p>Sub-recipient agencies:</p> <p>Malama Pono Health Services, Kauai: 4366 Kukui Grove Street, Suite 207/PO Box 1950, Lihue, HI, 96766.</p> <p>Hawaii Island HIV/AIDS Foundation: 74-5620 Palani Road, Suite 101, Kailua-Kona, HI, 96740.</p>
	Planned Activities	<p>Activities planned under the PY19 HOPWA project include:</p> <p>Tenant-based rental assistance (TBRA): Provide funds to pay a portion of the market rental unit costs for homeless and at-risk persons with HIV/AIDS. Maui AIDS Foundation, as the administrative lead, has determined that using each county's Section 8 payment standard is advantageous to identifying available market units for rent. Since rents on the neighbor islands are prohibitive to low income HOPWA clients, the voucher payment standards provided more flexibility than the HUD Fair Market Rent system.</p> <p>Short term rent, mortgage and utility (STRMU): Provide short term financial assistance, paid on the participant's behalf as an intervention to help households maintain their current housing to prevent homelessness.</p> <p>Permanent housing placement services: Provide housing information and financial assistance, including security deposits which may be used to help eligible persons establish a new residence where ongoing occupancy is expected to continue.</p> <p>Supportive Services: Provide supportive services such as health care accessibility, transportation, housing information, with or without housing activities, to those living with HIV/AIDS. Other services include counseling and referrals for physical and mental health; assessment; drug and alcohol abuse treatment and counseling; personal assistance; nutritional services; intensive care, when required; and assistance in gaining access to local, State, and Federal government benefits and services. Health services shall only be provided to individuals with HIV/AIDS or related diseases.</p> <p>Administration: Project Sponsor will utilize administrative funds for overall program management, coordination, evaluation, record-keeping and reporting by the staff assigned to the HOPWA Program. Program administration activities include monitoring program compliance, preparing HUD reports and documents, program budget, and evaluating program results.</p>
3	Project Name	HOPWA19 Hawaii DHS Admin
	Target Area	Rural Counties
	Goals Supported	HP-6 Administration
	Needs Addressed	Services for Persons with HIV/AIDS Planning and Administration
	Funding	HOPWA: \$7,763
	Description	The Hawaii State Department of Human Services (DHS), the HOPWA Administrator, will support the provision of effective program administration.

	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	DHS-BESSD, Homeless Programs Office, 1010 Richards St., Suite 312, Honolulu, HI, 96813.
	Planned Activities	Administration.
4	Project Name	HOME 2019 - HHFDC Admin
	Target Area	Rural Counties
	Goals Supported	HA-1 Program Administration
	Needs Addressed	Fair Housing Planning and Administration
	Funding	HOME: \$150,407
	Description	The Hawaii Housing Finance and Development Corporation (HHFDC) will utilize HOME funds to administer and coordinate the State's HOME program to ensure effective and timely project implementation in accordance with all applicable HUD rules and regulations. For PY2019, HHFDC will retain 5% of the annual HOME allocation for its administration of the HOME program.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	n/a
	Planned Activities	Administration of the HOME Program.
5	Project Name	HOME 2019 - Kauai County Admin
	Target Area	
	Goals Supported	HA-1 Program Administration
	Needs Addressed	Fair Housing Planning and Administration
	Funding	HOME: \$150,406
	Description	The County of Kauai will utilize HOME funds to administer its HOME allocation to ensure effective and timely project/program implementation in accordance with all applicable HUD regulations.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	Kauai County Housing Agency, 4444 Rice Street, Suite 330, Lihue, Hawaii, 96766
	Planned Activities	Administration of the HOME program.
6	Project Name	HOME 2019 - Pua Loke Affordable Housing Development
	Target Area	Rural Counties
	Goals Supported	HR-1 New Construction/Rehab - Rental Hsg
	Needs Addressed	Rental Housing
	Funding	HOME: \$2,256,104
	Description	Development of approximately 50 unit rental project consisting of 1, 2 & 3 bedroom units on a 1.5 acre parcel of County-owned land. HOME units will have a 20-year affordability period.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	6 HOME assisted units are estimated for the project.
	Location Description	TMK (4) 3-8-005, Parcels 28 and 29 Lihue, Hawaii
	Planned Activities	HOME funds to be utilized for development of 50 unit rental project consisting of 1, 2 & 3 bedroom units. Six of the units will be HOME-assisted.
7	Project Name	HOME 2019 - CHDO Activity, TBD
	Target Area	Rural Counties
	Goals Supported	
	Needs Addressed	Affordable Homeownership Opportunities

	Funding	HOME: \$451,221
	Description	HHFDC's HOME funds are rotated annually between the neighbor island counties of Hawaii, Kauai and Maui. The County of Kauai (CoK) is scheduled to receive HHFDC's PY2019 HOME funds, but was initially unable to identify a CHDO activity. The CoK is in the process of identifying an eligible CHDO activity to utilize the CHDO funds. Once selected, the PY2019 AAP will be amended to include the CHDO activity.
	Target Date	7/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	The number and type of units will be determined at a future date.
	Location Description	TBD
	Planned Activities	TBD
8	Project Name	HTF 2019 - Pua Loke Affordable Housing Development
	Target Area	Rural Counties
	Goals Supported	HR-4 New Construction/Rehab - Rental Housing
	Needs Addressed	Rental Housing
	Funding	HTF: \$1,350,000
	Description	Development of approximately 50 unit rental project consisting of 1, 2 & 3 bedroom units on a 1.5 acre parcel of County-owned land. HTF units will have a 30-year affordability period.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 HTF assisted units
	Location Description	TMK (4) 3-8-005, Parcels 28 and 29 Lihue, Kauai, Hawaii
	Planned Activities	HTF funds to be utilized for development of 50 unit rental project consisting of 1, 2 & 3 bedroom units. Four of the units will be HTF-assisted.
9	Project Name	HTF 2019 - HHFDC Admin
	Target Area	Statewide
	Goals Supported	HA-1 Program Administration
	Needs Addressed	Fair Housing Planning and Administration
	Funding	HTF: \$150,000
	Description	HHFDC will use HTF to administer and coordinate the State's HTF program to ensure the production or preservation of affordable housing in accordance with HHFDC's HTF Allocation Plan and regulations provided in 24 CFR Part 93.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	HHFDC, 677 Queen Street, Suite 300, Honolulu, HI, 96813
	Planned Activities	Program administration.
10	Project Name	HTF 2019 - Kauai County Admin
	Target Area	Rural Counties
	Goals Supported	HA-1 Program Administration
	Needs Addressed	Fair Housing Planning and Administration
	Funding	HTF: \$75,000
	Description	The County of Kauai's Kauai County Housing Agency will utilize HTF to administer and coordinate the County's HTF program to ensure effective and timely project implementation in accordance with all applicable HUD rules and regulations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	County of Kauai, Kauai County Housing Agency, 4444 Rice St., Suite 300, Lihue, HI, 96766.

	Planned Activities	Program administration.
11	Project Name	HTF 2019 - City and County of Honolulu Admin
	Target Area	Statewide
	Goals Supported	HA-1 Program Administration
	Needs Addressed	Fair Housing Planning and Administration
	Funding	HTF: \$75,000
	Description	The City & County of Honolulu will use HTF grant funds to administer its HTF allocation to ensure effective and timely project/program implementation.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	City and County of Honolulu, Department of Community Services, 925 Dillingham Boulevard, Suite 200, Honolulu, HI, 96817
	Planned Activities	Program Administration
12	Project Name	HTF 2019 - City and County of Honolulu
	Target Area	Statewide
	Goals Supported	HR-4 New Construction/Rehab - Rental Housing
	Needs Addressed	Rental Housing
	Funding	HTF: \$1,350,000
	Description	Fifty percent of HHFDC's HTF funds are awarded annually to the City and County of Honolulu (the City). The City was initially unable to identify an eligible HTF activity for PY2019 but is currently in the process of another solicitation for an eligible HTF activity. The City anticipates using its PY2019 HTF funds in the amount of \$1,350,000 to provide approximately seven rental housing units in the downtown Honolulu or east Honolulu regions of the City & County of Honolulu, serving extremely low-income households with incomes at or below 30% AMI. Once selected, the PY2019 AAP will be amended to include the City's PY2019 HTF activity.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that its HTF activity will produce or preserve seven affordable rental units serving extremely low-income households with incomes at or below 30% AMI. The actual number of units will be determined at a later date.
13	Location Description	TBD
	Planned Activities	Production or preservation of affordable rental housing.
	Project Name	HOME 2019 – TBRA
	Target Area	Rural Counties
	Goals Supported	HR-2 Tenant Based Rental Assistance
	Needs Addressed	Rental Housing
	Funding	HOME: \$50,000
	Description	The County of Hawaii anticipates receiving approximately \$50,000 in HOME program income which, if received, will be used in its TBRA program to assist approximately two low- and very low-income households.
	Target Date	09/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately two low- and very low-income households.
	Location Description	County of Hawaii
	Planned Activities	TBRA vouchers could assist low- and very low-income households by subsidizing their rent payments.

Table 11 – Project Summary Information

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

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

No

Available Grant Amounts

Not applicable.

Acceptance process of applications

Not applicable.

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

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

No

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

Not applicable.

AP-50 Geographic Distribution – 91.320(f)

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

The HOME, ESG and HOPWA program funds will be used in the State of Hawaii, particularly in the Counties of Hawaii, Kauai and Maui. Although most projects and activities will benefit areas of minority concentration, funds will not be specifically targeted for that sole purpose.

The HTF program funds will be used statewide in all four counties of the State of Hawaii.

Geographic Distribution

Target Area	Percentage of Funds
Rural Counties	100
Statewide	100

Table 12 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The HOME, ESG and HOPWA program funds will be used in the State of Hawaii, focused on the rural counties of Hawaii, Kauai and Maui. The City and County of Honolulu receives its own allocation of HOME, ESG and HOPWA funds. Although most projects and activities will benefit areas of minority concentration, funds will not be specifically targeted for that purpose.

The HTF program funds will be rotated and used in all counties of the State, including the City and County Honolulu, for rental housing projects serving households with incomes at or below 30 percent

AMI. Like the HOME funds, projects and activities will likely benefit areas of minority concentration, but funds will not be specifically targeted for that purpose.

Discussion

The State distributes its annual HOME allocation among the Counties of Hawaii, Kauai and Maui, as "State Recipients," and will distribute its annual HTF allocation to the City and County of Honolulu and one of the neighbor island counties, as "Subgrantees." State Recipients and Subgrantees will not allocate their HOME or HTF funds based on geographic areas. In general the HOME and HTF funds will be allocated through a Request for Proposals process or application process, which ranks and rates proposals for program eligibility, the extent to which a proposal meets the needs of the community, and meeting the Consolidated Plan priorities, objectives and performance measures.

Affordable Housing

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

Introduction:

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

Table 13 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2
The Production of New Units	17
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	19

Table 14 - One Year Goals for Affordable Housing by Support Type

Discussion:

The County of Kauai (CoK) will use its PY2019 HOME funds and HOME program income to produce six new HOME-assisted units for families in the 50-unit Pua Loke Affordable Housing Project in Lihue. CoK will also use its HTF funds in the Pua Loke project for four HTF-assisted units, serving households with incomes at or below 30% AMI.

The CoK was initially unable to identify an activity for its PY2019 HOME CHDO funds of \$451,221, but has since issued another application seeking eligible CHDO activities. The CoK intends to utilize HOME CHDO funds for the development of affordable homeownership housing in the Waimea area; these funds may provide approximately 10 affordable homeowner units.

The City and County of Honolulu is in the process of soliciting an eligible HTF activity and anticipates using its PY2019 HTF funds to provide seven rental housing units in the downtown Honolulu or the east Honolulu regions of Oahu that will serve households with incomes at or below 30% AMI (extremely low-

income families).

The County of Hawaii anticipates the receipt of approximately \$50,000 in HOME program income which, if received, will be used to assist two households with TBRA. The County of Maui does not anticipate the receipt of program income but if received, will be used for its Kahoma Residential project in Lahaina.

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

Updated information on Public Housing will be provided in the final PY2019 AAP.

Introduction:

Demand for public housing units remains high in Hawaii. As of March 31, 2018, the Hawaii Public Housing Authority's waitlist for federal public housing units totaled more than 9,594. Of these, more than 8,887 were families with extremely low income, 30% or less of AMI. Waitlisted families with children totaled 3,508, while elderly families and families with disabilities totaled nearly 1,937 and 1,824, respectively. Families on HPHA's waitlist for Section 8 as of March 31, 2018 totaled more than 5,719; of these, families with extremely low incomes totaled 4,661. More support and assistance are clearly needed for this segment of the population.

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

HPHA's waitlist for public housing units as of March 31, 2018 totaled 9,594; HPHA continues to turnover vacant units as quickly as possible by employing effective maintenance and management policies and outsourcing labor where appropriate, to minimize the number of off-line housing units. The HPHA is also seeking to increase the number of affordable housing units by applying for additional section 8 units, should they become available; by leveraging affordable housing resources through the creation of mixed-financing housing; and by pursuing housing resources other than public housing or section 8 tenant based rental assistance.

To offset decreases in federal program funding, HPHA is also requesting Capital Improvement Project funding from the State Legislature in order to address the physical needs of the agency's public housing properties. The HPHA continues to provide training to all employees with regard to Fair Housing and Limited English Proficiency laws to better assist its residents.

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

The HPHA continues to operate the Tenant Aide Program for federal low-income public housing residents, and continues to fill vacant positions in the Property Management and Maintenance Services Branch to assist residents in accessing resident services and case management.

The HPHA also works with resident associations and the Resident Advisory Board for input on its Five-Year and Annual Public Housing Agency Plan.

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

provided or other assistance

HPHA is not designated as Troubled.

Discussion:

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

Introduction

HHFDC's PY2019 HTF will be used in the City and County of Honolulu and the County of Kauai, for the development or preservation of affordable rental housing serving households with incomes at or below 30% AMI, including homeless households.

In addition, through the collaborative efforts of the Hawaii Interagency Council on Homelessness (HICH) and numerous interested stakeholders, a unified, robust plan for the State of Hawaii has been developed. From this strong foundation emerged a clear direction for Bridging the Gap and DHS/HPO to frame the 5 Year Consolidated Plan, and the subsequent Annual Action Plans.

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

The State's Outreach Program agencies are considered access points to the CoC's coordinated entry process which begins with the use of the VI-SPDAT, the common triage tool. An important goal of the CoC is to create a by-name list with corresponding VI-SPDAT score so that, based on vulnerability and other prioritization factors, all homeless individuals can be matched with the resources most appropriate to their needs. Assertive community outreach is conducted to identify and engage the homeless.

A cohesive, coordinated outreach effort continues in the rural counties to ensure that the individuals and families assessed via VI-SPDAT with the highest acuity are prioritized for a permanent supportive housing level of care. The State Homeless Outreach Program provides comprehensive geographic coverage of the State's four counties: Oahu, Maui, Kauai and Hawaii.

The outreach agencies contracted by the State seek out the unsheltered homeless on beaches, in parks, on the streets, and other places where the homeless congregate. The unsheltered homeless and at-risk population who might not otherwise receive assistance are provided with basic intake and assessment to identify their individual needs and barriers.

In November, 2016, DHS/HPO issued a RFP (valid for four years) seeking outreach and civil legal services. Agencies funded under this opportunity are required to use a Housing First (HF) approach. The goals of the HF approach are to help homeless individuals and families access permanent housing as rapidly as possible by assisting with quickly locating and accessing housing options and connecting them to services and supports that will support housing stabilization. In the HF approach, staff uses assertive engagement strategies and assist individuals and families to develop housing plans, obtain needed documents for the housing application process, obtain income through public benefits and employment, identify and locate suitable housing options and provide support through the housing location and

access processes. DHS/HPO continues to fund legal services in association with its Outreach Program.

In PY17, DHS/HPO implemented a new legal service in association with its Outreach and Shelter Programs. The primary focus is to provide assistance to resolve legal problems that prohibit program Participants from obtaining permanent housing or will likely result in the loss of permanent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The ESG Shelter Operations and the State Homeless Shelter Program will fund emergency and/or transitional shelters with the intent to achieve broad geographic accessibility throughout the state. Hawaii's shelters provide a secure environment where individuals and families can stabilize lives, address needs and strengthen economic situations. These facilities provide a broad spectrum of services, or referral to services, to address the multiple needs of homeless clients, including substance abuse, mental health and educational services; job and life skills training; and family support.

All shelters provide access to basic needs, such as a safe and decent place to sleep, prepared meals and/or food/kitchen facilities, hygiene essentials, and clothing. The State's emergency shelters are considered access points and will be contractually required to utilize the VI-SPDAT and participate in each county's Coordinated Entry System (CES). The system is being further developed as a tool to help emergency and transitional shelter providers better assess level of care needed by clients, determining which individuals/families could best benefit from shelter services.

Some of the planned refinements in the State's homeless service system include helping homeless shelter providers develop the capacity to deliver services to individuals and families in permanent housing vs. in the traditional shelter setting. Service providers are also encouraged to practice diversion strategies so that individual and families may self-resolve and avoid entering the homeless system.

In January 2019, DHS/HPO issued a RFP which required that shelter services be provided in a manner that is consistent with the Housing First approach: providing low barrier to entry and ongoing program participation; focusing on housing access and retention; connecting community integration and recovery; ensuring participant choice in support services; and providing assertive engagement and housing-focused case management. For the first time, transitional shelter providers will be allowed to utilize beds or units for bridge housing. Providers will be required to follow its CoC CES process and obtain prior written authorization by HPO. The provider will also be required to work closely with a permanent supportive housing program to assist in obtaining permanent housing for the participant. Bridge housing will be used for a short-term stay, generally for up to 90 days, when an individual or family has been offered and accepted a permanent housing intervention (e.g., section 8 voucher, permanent supportive housing voucher, rent to work voucher), but is not able to immediately enter the permanent housing. Other first-time requirements and opportunities include 24-hour access 7 days per week for all emergency facilities, and aftercare case management services.

In February 2019, DHS issued a RFP for the existing Kakaako (Honolulu) Family Assessment Center (FAC) and a new FAC for any county statewide. The target population of the FAC are unsheltered homeless families transitioning to permanent housing. FAC services focus on helping families access permanent housing as rapidly as possible by removing barriers to program entry, assisting with quickly locating and accessing housing options, assisting to access income and benefits, and connecting to community services and supports to promote stability and prevent evictions and returns to Homelessness.

In the arena of affordable housing, HHFDC anticipates receiving the state minimum of \$3,000,000 under the HTF program for the production or preservation of affordable housing. HHFDC will subgrant its HTF funds to the counties for rental housing activities serving households with incomes at or below 30%

AMI, including homeless families.

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

The State's DHS-HPO will continue to strategically use state funds, which are less restrictive than federal funds, to create a system of care for needy individuals and families at a broad range of AMI. ESG HPRP funds are restricted to those at 30% of AMI, yet there are many people who earn between 30-50% of AMI who need and would benefit from assistance. The State's programs, including the existing Housing Placement Program and State Homeless Emergency Grant program are geared to address those who are in this income level.

The State's Housing First (HF) program, available statewide including to rural county applicants, requires compliance with HUD's definition in determining priority for permanent housing. However, there are those who do not reach the required level of chronicity, yet are extremely vulnerable and desperately need housing and supportive services. Hence, the DHS offered an alternative eligibility process in consideration of homeless individuals and families who do not quite meet the criteria of the "chronically homeless" definition. Services providers who recognize these attributes in their clients may request approval from the DHS for placement in permanent housing through the HF program and are expected to do their due diligence by completing the required paperwork. Each request is on a case by case basis, and utilized sparingly.

The State apportioned funding for the HF program based on population: Hawaii County – 50%; Maui County – 34%; and Kauai County – 16%, comparable to the distribution logic for ESG. One provider for each county was selected to provide HF services in its geographic area. The target population to be served by this program is the documented unsheltered (or sheltered in emergency shelters), most vulnerable, chronically homeless. The documentation of chronicity will be accomplished to the extent possible, via the HMIS, while the "level of care" determination will be established using the VI-SPDAT triage tool.

The State RRH program will provide financial assistance and support services for those imminently at-risk of losing their home within 14 days and homeless individuals and families. In alignment with the ESG HPRP, the State anticipates that it will allocate 60% of the total funds to RRH and 40% to prevention. RRH will provide access to financial assistance including rent, utility, and security deposits; and supportive services including housing location support; rent and move-in assistance; housing stabilization and case management services. At-risk and homeless individuals and families earning at or below 50% of the AMI are eligible for this program.

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

The State will continue the work of the Hawaii Interagency Council on Homelessness to create "common ground" solutions between large public systems such as hospitals, prisons and mental institutions

regarding resource allocation and discharge planning both for the homeless and non-homeless populations.

Strengthen intersection between healthcare and housing – In October 2018, the Center for Medicare and Medicaid Services (CMS) approved amendments to the State’s 1115 Medicaid waiver. This amendment enables the State to better utilize Medicaid in providing supportive services to assist homeless persons with maintaining tenancy following housing placement. DHS is working with the health plans and homeless service providers to implement the new waiver amendment. The implementation plan includes providing training to local health plans on housing-focused approaches to patient care, and training for homeless providers on billing for Medicaid services.

In late 2018, the State implemented two pilot programs in partnership with the Queen’s Medical Center on Oahu. The Medical Respite Pilot Program will provide short-term, temporary housing and supportive services to medically frail Homeless individuals upon being discharged from a hospital. The Emergency Department Pilot Program will provide high intensity care navigation for the homeless persons with the greatest medical needs and/or the highest Emergency Department utilization rates. The success of these pilot programs may potentially lead to the implementation of similar programs in the rural counties.

Pilot new models for Permanent Supportive Housing (PSH) – The State and the four counties continue to expand site-based permanent supportive housing with funding provided by Act 209, Session Laws of Hawaii 2019, for the Ohana Zone pilot program. In addition, the HICH has reviewed financial modeling data prepared by the Corporation for Supportive Housing (CSH) and, based on this modeling, adopted a set of priorities for the 2019 legislative session that include a request for \$75 million a year for the next ten years to be set aside for capital funding for site-based permanent supportive housing projects.

Address discharge planning and transition of inmates exiting from incarceration – The Department of Public Safety (PSD) executed Memorandums of Agreement (MOAs) with the Hawaii Department of Health and Department of Transportation to streamline the process for offenders to obtain birth certificates and state identification prior to discharge. In addition, a partnership between PSH, DHS, and a local homeless service provider has helped to ensure that offenders maxing out of the longest jail/prison sentences are enrolled in Medicaid programs for health coverage prior to discharge. Law Enforcement Assisted Diversion (LEAD) programs that provide pre-arrest diversion services are also being expanded beyond Oahu to include new programs in Hawaii and Maui counties.

Discussion

See ESG Attachment B (Outcome Measures) for State Outreach, Shelter, Rapid Re-housing and Housing First programs.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	10
Tenant-based rental assistance	16
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	26

Table 15 – HOPWA One-Year Goals

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

Many factors contribute to the shortage of housing and, consequently, the lack of affordability in housing in the State. Included are demographic changes, market forces, changes in federal housing policy, changes in federal tax policy, and development constraints (including lack of "reasonably priced," developable land, lack of infrastructure, high development costs, government regulations, community opposition, and growing environmental requirements).

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

Integral to any strategy to remove or ameliorate the barriers to affordable housing is collaboration through public-private partnerships. Partnerships are needed to educate decision-makers, be at the table to champion affordable housing, and find ways to incentivize the development of affordable housing.

Tax Policy Strategies - Continue to utilize Section 201H-36, Hawaii Revised Statutes (HRS), which authorizes HHFDC and the counties to approve and certify for exemption from general excise taxes any qualified person or firm involved with a newly constructed, or moderately or substantially rehabilitated, affordable housing project.

Provide lawmakers with information on the successes of Housing Bond and Low Income Housing Tax Credit programs and request increased credit resources to help combat the affordable housing crisis. Government regulation strategies - Continue to utilize Section 201H-38, HRS, which provides eligible affordable housing projects with an expedited process to obtain land use and zoning approvals. It also provides greater flexibility in the design of housing projects.

Continue to work to accelerate regulatory and building permits by supporting third-party reviews, eliminating duplicative reviews at the State and County levels, and creating design standards for workforce housing, as well as transit-oriented development. Participate in pilot projects, such as micro-apartment units or container housing, to find ways to reduce development costs.

Infrastructure strategies - Implement alternative financing mechanisms to fund infrastructure improvements including community facilities districts and tax increment financing. Explore mixed-use developments that incorporate affordable housing and other community services in close proximity to high quality public transit.

Resource strategies - Continue to make government land and financing resources (e.g., Rental Housing Revolving Funds, LIHTCs) available for affordable housing development. Explore alternative financing sources including a Transit Oriented Affordable Housing (TOAH) Funds, which is a public-private financing resource funded by government, philanthropic and financial entities for the development of affordable housing and community facilities near transit lines. In addition, HHFDC will apply for federal grant funds under the National Housing Trust Fund program, which provides funding for the production or preservation of affordable housing. HHFDC will subgrant its HTF allocation to the four counties, to use solely for rental housing serving households with incomes at 30% or below AMI, including homeless households. Continue to advocate for funding for the Rental Housing Revolving Fund and capital

improvement project funds for affordable rental housing projects.

Explore additional incentives for private development participation in the development of affordable housing. Also explore opportunities to collaborate with new public partners in the mixed-use residential development of government lands.

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

As a condition to receiving HUD Community Planning and Development funds such as the HOME program, grantees like HHFDC are required to affirmatively further the purposes of the Fair Housing Act. To help identify impediments to fair housing choice, grantees conduct an Analysis of Impediments to Fair Housing Choice (AI) that analyzes existing conditions affecting fair housing, identifies impediments to fair housing, and proposes an agency action plan outlining steps to reduce the impediments.

Generally, HHFDC has updated its AI every five years to coincide with the Consolidated Plan. HHFDC conducted a staff update in 2015, and collaborated in 2016 with other state and county agencies to contract with the University of Hawaii's Center on Disability Studies to conduct an AI focused on impediments facing people with disabilities. Participants were HHFDC, Department of Hawaiian Home Lands, the Homeless Programs Office of the Department of Human Services - Benefits, Employment and Support Services Division, Hawaii Public Housing Authority, the County of Hawaii, the City and County of Honolulu, the County of Kauai, and the County of Maui.

The 2016 AI identified substantial impediments to fair housing choice for people with disabilities in Hawaii: 1) a lack of knowledge on the part of people with disabilities, members of the general public, landlords and property managers about legal requirements for fair housing choice and available resources and programs that can support people with disabilities to obtain and retain suitable housing; 2) people with disabilities at lower income levels have tremendous difficulties obtaining affordable housing that is accessible; 3) many personnel lack attitudes, skills, and knowledge to serve and support people with disabilities in the housing, social services, medical, caretaking, and related fields; and 4) service systems are not well-coordinated with regard to supporting people with disabilities to obtain and retain suitable housing, particularly those with serious cognitive disabilities.

The 2016 AI identified three goals to address these impediments: 1) enhance public awareness of fair housing; 2) increase the availability of affordable housing that is accessible or visitable; and 3) enhance housing options for people with serious cognitive impairments. HHFDC plans to provide fair housing education for its staff and participate in such educational events when possible. HHFDC and other state and county housing agencies will strive to collaborate with advocacy groups such as the UH's Center on Disability Studies and the Hawaii Disability Rights Center to support goals 2 and 3.

HHFDC is committed to providing Hawaii's residents with affordable housing free from discrimination, and requires compliance with the Fair Housing Act, the Americans with Disability Act and Section 504. To ensure accessibility compliance and as required by Section 103-50, HRS, affordable housing projects that receive funds under HHFDC's state financing programs must submit their projects for accessibility review to the state's Disability and Communication Access Board (DCAB). In addition, HHFDC and DCAB maintain a cooperative agreement for DCAB's review of projects receiving rental assistance or federal and state low income housing tax credits from HHFDC, programs which are not subject to Section 103-

50, HRS. This cooperative agreement has been in place since 1992, and exemplifies the state's commitment to providing accessible, affordable housing.

Actions planned to address obstacles to meeting underserved needs

Major obstacles to meeting underserved needs are the severe shortage of affordable housing and the lack of funding. To address these obstacles, the State will pursue, or continue to pursue, the following: advocate for increases in State funding to support the development of affordable housing, homelessness prevention and rapid re-housing activities, and for homeless / shelter services and improvements; consolidate the CoC NOFA applications for funding to meet underserved needs and provide technical assistance to improve outcomes; continue HICH 10 Year Plan to End Homelessness; work with State Recipients to improve the administration of the HOME program; leverage federal resources such as HOME funds with other financing such as LIHTCs to increase the supply of rental housing for underserved low-income populations; invest federal sources such as HOME and HTF funds to provide low-cost rental units for transitional housing and supportive services to homeless populations and sheltered families who are at risk of becoming homeless; apply for competitive federal funds to acquire / build supportive housing to meet the housing and service needs of the chronically homeless and homeless families; continue programs to help homeless, Section 8 voucher holders, and at-risk families in securing private sector permanent housing with assistance in first month's rent, rental deposit, landlord intervention to foster good tenancy, landlord solicitation to increase the number of available units, budgeting classes, and other support services.

Actions planned to foster and maintain affordable housing

Part of the plans to foster and maintain affordable housing is to remove or ameliorate barriers to affordable housing. HHFDC plans to collaborate through public-private partnerships to educate decision-makers, be at the table to champion affordable housing, and find ways to incentivize the development of affordable housing. HHFDC will utilize its federal HOME and HTF funds to increase or preserve the state's supply of affordable rental housing for low-income populations.

HHFDC will continue to make government land and financing resources (e.g., Rental Housing Revolving Fund, LIHTCs) available to affordable housing development, and explore alternative financing resources, including Transit-Oriented Affordable Housing (TOAH) funds, which is a public-private financing resource funded by government, philanthropic and financial entities for the development of affordable housing and community facilities near transit lines. Additionally, HHFDC will apply for federal funding under the National Housing Trust Fund program, to produce and preserve affordable housing targeted to households with extremely low-incomes, including homeless households.

HHFDC will continue to advocate for funding for the Rental Housing Revolving Fund and capital improvement project funds for affordable rental housing projects, explore additional incentives for private development participation in the development of affordable housing; and explore opportunities to collaborate with new public partners in the mixed-use residential development of government land. In addition, HHFDC will continue to utilize Section 201H-38, HRS, which provides eligible affordable housing projects with an expedited process to obtain land use and zoning approvals, and greater flexibility in the design of housing projects. HHFDC will work to accelerate regulatory and building permits by supporting third-party reviews, eliminating duplicative reviews at the State and County levels, and creating design standards for workforce housing, as well as transit-oriented development. Participating in pilot projects, such as micro-apartment units or container housing, to find ways to reduce development costs, will also help to produce affordable housing.

Actions planned to reduce lead-based paint hazards

While almost all of HPHA's family projects have been tested and either encapsulated or abated, the Department of Health requires that with each modernization, updated test results must be provided that is no more than 2 years old. Therefore, when doing modernization, HPHA will include LBP testing as part of the scope and abate/encapsulate as required, or treat the entire project as under the assumption that it is lead-containing and monitor and abate/encapsulate as required in lieu of obtaining new test reports.

Actions planned to reduce the number of poverty-level families

The mission of the State's Department of Human Services (DHS) is to direct resources toward protecting and helping those least able to care for themselves and to provide services designed towards achieving self-sufficiency for clients as soon as possible. The production and preservation of affordable housing provide housing stability that assists families in their efforts to attain economic self-sufficiency. The HHFDC, DHS-BESSD/HPO, HPHA, and counties will continue to consult with DHS to coordinate and maximize program benefits to poverty-level families. The affordable housing strategy will assist to reduce the number of poverty-level families.

DHS will continue its implementation of 'Ohana Nui, a concurrent all-generation approach which addresses the needs of the whole family. This concept gives families the best chance of breaking the inter-generational cycle of poverty by addressing the highest need areas: housing; food/nutrition; health/wellness; economic self-sufficiency/education; and social capital.

Actions planned to develop institutional structure

HHFDC, DHS-BESSD/HPO, and the counties will continue to take the lead in implementing the state Consolidated Plan, in consultation with an extensive network of public and private organizations involved with providing affordable housing, special needs housing and supportive services. The strengths of the delivery system in the State are derived from the many different entities striving toward one common goal: to provide for more affordable and supportive housing in the State. State, federal and county agencies, private nonprofits, private social service providers, private lenders, and private for-profit developers are partnering to respond to the urgency of the housing situation in Hawaii. Each stakeholder in the delivery system contributes resources and expertise from its specific area of operation. In overcoming gaps in the delivery system, an integrated approach will be undertaken to achieve a common vision for housing. Commitment, coordination and collaboration among and within all levels of government, private sector, nonprofits and consumers are necessary. In the homeless arena, the Hawaii Interagency Council on Homelessness is achieving this integrated approach to increase the state's capacity to end homelessness, through collaborative efforts across governmental agencies and service providers. In addition, DHS/HPO has a goal to expand the 'Ohana Nui / Family Assessment Center (FAC) concept to the neighbor islands and rural Oahu. The FAC reflects a new approach to the traditional homeless shelter practice. This program emphasizes rapid placement into permanent housing while providing wrap-around services to stabilize families. The FAC in Honolulu utilizes a comprehensive network of service providers to help break the cycle of homelessness to find permanent housing placement.

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

HHFDC, DHS-BESSD/HPO, and the counties will solicit nonprofit developers and service providers to continue to provide affordable rental housing, self-help housing, and housing for special needs groups.

Private industry, including for-profit developers and financial institutions, will play a major role in expanding affordable housing opportunities for Hawaii's low- and moderate-income households. Private foundations will be a source of grants and other resources. Faith-based groups will provide grants, manpower, support services, and other resources, primarily for the most vulnerable populations, such as the homeless and persons with special housing needs. Government agencies involved with the "bricks and mortar" of housing and related infrastructure, including HHFDC, Department of Hawaiian Home Lands, county housing agencies, HUD and USDA-Rural Development, will facilitate the development of affordable housing by providing financing tools and other resources. Governmental agencies involved with the provision of human services and health, including the Departments of Health and Human Services, will provide resources either directly to clients or through nonprofit health and service providers to support low- and moderate-income households.

Discussion:

Program Specific Requirements

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

Introduction:

According to the 2016 Hawaii Housing Planning Study, more than 43,800 housing units will be needed by 2025 to fulfill the demand for low- and moderate-income households ($\leq 80\%$ AMI). In response to the decreasing availability of affordable units due to rapid growth in private sector housing sales, coupled with limited housing production, HOME funds will be used for families earning 80 percent or less of the area median income, through the construction of affordable rental units, tenant based rental assistance, and the development of affordable homeownership opportunities. HTF funds will be focused on the production or preservation of rental housing for households earning 30% or less AMI. These federal funds will leverage other government and / or private resources.

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

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

The forms of assistance provided under the State's HOME program will be consistent with 24 CFR 92.205. No other forms of investments will be provided.

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:

When HOME funds are used for homebuyer assistance or the development of homeownership housing, the HHFDC requires State Recipients (the Counties of Hawaii, Kauai and Maui) to establish and impose resale or recapture provisions in accordance with 24 CFR §92.254(a)(5) to ensure affordability in the event of a subsequent sale of a property during the period of affordability.

The County of Hawaii will recapture the total amount of HOME funds expended for a project when the recipient fails to comply with the terms of its agreement with the County, or refuses to accept conditions imposed by the County, HHFDC, or HUD, when the recipient sells or otherwise transfers any real or personal property purchased or constructed with the HOME funds within the applicable

period of affordability and when the recipient ceases to use the property constructed, rehabilitated and/or renovated with HOME funds for the applicable period of affordability, following the issuance of final payment for the project by the County.

The County of Kaua'i (CoK) will use either the resale or recapture provision, depending on land tenure and other programmatic considerations: Recapture will be applied to fee simple sales. If a borrower transfers or sells the HOME-assisted property prior to the end of the affordability period, the total amount of HOME funds provided shall be due to CoK from available net proceeds. A modified resale provision will be used for fee simple self-help programs that provide HOME assistance as a development subsidy. If a borrower transfers or sells the HOME-assisted property prior to the end of the affordability period, the property shall be sold to another HOME-eligible purchaser. The fair rate of return for resale is established by Promissory Note that allows a borrower to sell the property to a HOME-eligible purchaser and, following the payoff of any mortgage(s), be entitled to any equity gain realized from the sale. Resale will be used for leasehold sales. If a borrower transfers or sells the HOME-assisted property prior to the end of the affordability period, the property must be sold to another HOME eligible purchaser. The fair rate of return for resale will be set by an objective standard, using appraised value performed by a duly licensed appraiser at initial purchase and appraised value at time of resale. The seller's share will be equal to 25% of the increase in appraised value. To ensure that housing remains affordable under CoK's resale and modified resale provisions, the County has defined the reasonable range of low-income homebuyers for subsequent purchase as those with incomes between 70% and 80% AMI.

The County of Maui (CoM) will use either a recapture or resale provision, depending on land tenure. A resale provision will be applied for Community Land Trust properties and a recapture provision will be applied for all other properties. CoM provides for a recapture provision if the home is sold during the affordability period, requiring a recapture of the HOME direct subsidy, less the subsidy amount prorated for the time the homeowner owned and occupied the unit. The homeowner may recover its entire investment (down payment and capital improvements made since purchase) before any of the Direct Subsidy is recaptured. The recapture amount is limited to net proceeds: the sales price less the superior loan repayment (other than the Direct Subsidy) and any closing costs. CoM also allows for the assumption of recapture obligations by a subsequent HOME-eligible purchaser, with no additional HOME assistance provided. If the subsequent homebuyer does not assume the HOME recapture obligations, the homeowner must repay the prorated HOME investment from any net proceeds. The Direct Subsidy provided to the homebuyer is calculated using the difference, at the time of purchase, between the purchase price of the home and the appraised value of the home.

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:

HHFDC's State Recipient Agreement with each County requires all housing assisted with HOME funds to meet the affordability requirements of 24 CFR §92.252 (affordable rental housing) or 24 CFR §92.254 (affordable homeownership housing) of the HOME Program regulations, and requires the repayment of HOME program funds to HHFDC if the housing does not meet the affordability requirements for the specified time period. Each County shall require the maintenance of all affordability requirements by executing deed restrictions and lien recordations or through the filing of restrictive covenants running with the land.

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:

HHFDC does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

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

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

Subrecipient agencies providing ESG assistance are contractually required by the State, detailed in the Scope of Service, to follow standards in accordance with United States, 24 Code of Federal Regulations Part 576 (24CFR Part 576) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), Emergency Solutions Grant Interim Rule. Eligibility standards are written in DHS/HPO's ESG Policies and Procedures Manual. (See ESG Attachment C: Standards for Providing Assistance). Work on standardizing written eligibility requirements for all State and Federal programs has been initiated by Bridging the Gap and HPO, and will continue in 2019. The HMIS Administration team has implemented very specific eligibility criteria into all TH, RRH, and PSH project resources participating in the CES to enable system matching. This helps to ensure that referrals made to specific projects are matched with only clients meeting these program eligibility requirements.

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

BTG has adopted "housing first" (HF) as a philosophical premise to end homelessness. This approach emphasizes providing support for stable housing as an important first, rather than last, step in a transition to independently sustained permanent housing. Moreover, BTG has selected a common triage tool, the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), and completed a substantial number of assessments using this prescreening tool in each county. In its efforts to be in alignment with HUD's standards and nationwide best practices, DHS/HPO has contracted for Outreach, Shelter, State Homeless Emergency Grants, Rapid Re-housing and Housing First programs requiring adherence to the HF model and participation in a coordinated entry system.

BTG's CES process begins with assertive community outreach to identify and engage the homeless, then utilizing the VI-SPDAT to assign a vulnerability score. The CoC has reached its goal of creating a by-name list by county with corresponding VI-SPDAT scores so that, based on vulnerability and other prioritization factors, all homeless individuals can be matched with the resources most appropriate to their needs. When necessary, local representatives will then convene case conferencing (CC) meetings throughout all rural county jurisdictions. CC is the venue where client needs are discussed and services are offered to meet those needs. CC also provides the opportunity for communities to assess the needs of the homeless and begin to document the gaps that exist in the service system.

Within the CoC, it is known that the current supply of affordable housing does not meet the demand for those most in need, making the need for an efficient coordinated entry process that much more important. (See BTG Coordinated Entry System, Policy and Procedures Manual for Singles and Families at:

https://www.hawaiihomelessprogramshmis.org/media/uploads/btg_ce_policy_and_procedures_manual_2018_june_revisions_3.pdf.)

In 2018, the HMIS Administration team implemented a fully automated the CES referral process.

These enhancements in HMIS create efficiencies in the system in terms of placing/housing clients, expand autonomy for providers, and allow the CoCs to use system data more confidently to drive policy and funding decisions.

In addition, the State Shelter RFP (posted in January 2019) requires awarded providers to complete an assessment using the Service Prioritization Decision Assistance Tool (SPDAT). The SPDAT is an evidence-informed approach to assess an individual's or family's needs and identifies the areas in the person/family's life where support is most likely necessary in order to avoid housing instability. Service providers shall assess program participant's service needs within 7 days of program entry, update the assessment at least monthly, and ensure assessments are signed by the Participant, case manager, and supervisor and dated.

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

The Department of Human Services first posts a Request for Information (RFI) on the State Procurement Office (SPO) website. Publication on a public website allows the State to reach a wide variety of interested stakeholders including non-profit, private community and faith based organizations. Additionally, the notice of publication is delivered through each local chapter listserv. The RFI is created in such a way that does not preclude providers from applying that previously had not received ESG funding.

The RFI requires work plan forms to identify clear goals, objectives and outcomes for two distinct programs: ESG Shelter Operations and ESG Homelessness Prevention and Rapid ReHousing. The Housing Opportunities for Persons with AIDS (HOPWA) RFI is simultaneously posted and follows the same processes and procedures as ESG. Eligible applicants (provider agencies) submit their project information in strict accordance to the RFI requirements within the specified deadline.

DHS/HPO reviews the applications and may request additional information from the applicants, if necessary. Applications are competitive and evaluated by a team consisting of individuals with no conflict of interest, representing each of the three CoC county chapters and the State. In general, applications are scored according to completeness of the application; agency's qualifications; financial feasibility; past performance; and agency's participation in CoC activities. The evaluation committee selects the awardees (usually agencies scoring 70% or higher). HPO verifies that the awardee agencies and its principals are not suspended or disbarred or otherwise excluded from participating in the transaction per 2 CFR section 180.995. This verification is accomplished by running a report for each agency through the System for Award Management (SAM) website. Awardees are notified through written notices.

HPO submits a combined proposal on behalf of the ESG/HOPWA awardees through the related sections of the Annual Action Plan to the Hawaii Housing Finance and Development Corporation (HHFDC). HHFDC consolidates the HOME, ESG and HOPWA information and publishes a draft Annual Action Plan for a 30 day comment period. After the 30 day comment period, HHFDC seeks consideration and approval from the HHFDC Board. When approved, HHFDC submits the plan to HUD by the established deadline. After review by HUD, HHFDC is notified of the award and a grant agreement is executed. The grant agreement names the Department of Human Services as the department designated to administer the grant. (DHS and HHFDC maintain a memorandum of agreement for the administration of the ESG and HOPWA programs.) DHS executes contracts with the selected provider agencies. Award list is posted on the SPO website as contracts are executed.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with

homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Bridging the Gap governance charter stipulates that a minimum of nine individuals shall comprise the BTG Board. Each of the three county chapters (Maui, Kauai and Hawaii) shall name three individuals from their membership to participate on the BTG board. One out of the three selected people shall be a representative of the respective county government. The second representative shall be the chair of the local chapter or their designated representative. The remaining member of the counties' delegation shall be chosen from the chapters' general voting membership. If one of the nine does not meet the homeless or formerly homeless criteria, then an individual meeting those criteria will be selected from the general membership. While every attempt will be made to involve a homeless or formerly homeless person, since the State is the primary recipient of ESG funds, the homeless participation requirement does not apply.

5. Describe performance standards for evaluating ESG.

The McKinney-Vento Homeless Assistance Act established a set of selection criteria for HUD to use in awarding CoC funding that require CoCs to report to HUD their system-level performance. The intent of these selection criteria are to encourage CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD. Specifically, the System Performance Module assess the CoC's performance against the following measures:

1. Length of Time Persons Remain Homeless
2. The Extent to which Persons Exiting Homelessness to PH Destinations Return to Homelessness
3. Number of Homeless Persons
4. Employment and Income Growth for Homeless Persons
5. Number of persons who become homeless for the 1st time
6. Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition
7. Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

See also, BTG's System-Level Performance Measures Dashboard for Bridging the Gap is posted on the Hawaii HMIS website at: <https://www.hawaiihomelessprogramshmis.org/>.

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

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

☒ Subgrantees that are HUD-CPD entitlement grantees

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

See HTF Attachment A, HTF Allocation Plan.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

Yes.

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

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

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

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

HHFDC's maximum per-unit development subsidy amount is described in its PY2018 HTF Allocation Plan, attached as HTF Attachment A.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The

standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

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

HHFDC's rehabilitation standards are described in its PY2018 HTF Allocation Plan, attached as HTF Attachment A.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A.

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

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

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

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

HHFDC's HTF funds will be used for the production or preservation of rental units serving households with incomes at or below 30% AMI. HHFDC's SubGrantees of County of Kauai and the City and County of Honolulu are scheduled to receive HHFDC's PY2019 HTF. The County of Kauai plans to use its HTF in the Pua Loke Affordable Rental Housing Project which will produce fifty rental units, four of which will be HTF-assisted to serve households with incomes at or below 30% AMI. The City and County of Honolulu is in the process of identifying its PY2019 HTF activity. It anticipates using PY2019 HTF to provide an estimated seven affordable rental housing units in the downtown or east Honolulu areas, to serve extremely low-income households with incomes at or below 30% AMI.

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

N/A.

Discussion:

PUBLIC HEARINGS

on the

PY2019 AAP

Written Comments Received and HHFDC Responses

Fuller Lives

1075 Kamookoa Place
Honolulu, HI. 96825

September 19, 2018

HHFDC
677 Queen St.
Honolulu, HI. 96813

To: Hawaii Housing Finance and Development Corporation
Subject: Testimony for consideration in the Annual Action Plan for Program Year 2019 -2020

RECEIVED
HAWAII HOUSING FINANCE
DEVELOPMENT CORP
2018 SEP 20 A 10: 8

I provided testimony last year for the HHFDC hearing. This issue has not changed. We still have a dire shortage and a 10 year wait list for residential options for adults with Intellectual and Developmental disabilities.

Fuller Lives is a non-profit organization of parents who are searching for residential solutions such as group homes or apartments for our dependent adult children who have intellectual and/or developmental disabilities. Many of these adult children are in their 30's, 40's and 50's. Many live in their family home with parents. Some are living with concerned friends (special Olympics coaches, for example) who took them in when they noticed that they had nowhere to live and no one looking after them. This population is at great risk for ending up homeless. Their parents are aging. Some in their 80's needing care themselves. Parents are trying to plan for the future.

Some group homes and apartments exist but parents have been informed that the wait list is long and could be **10 years** before a vacancy comes up. Most of the homes are in central and west Oahu. Many families are in Honolulu and east Honolulu and would like to see their children living in that area where they have established networks and supportive church and community affiliations. And parents could visit them more easily as both groups continue to age.

Residential solutions for this population are currently insufficient. There is a need for permanent residential solutions to support the hundreds of adults with developmental and intellectual disabilities still living at home with aging parents. These adults must be included in your planning for housing and community development.

Mahalo,

Susan Berk
Fuller Lives Foundation
808-927-3458

Valery O'Brien
Resident Experience Coordinator
Holiday Retirement

As a parent of a Deaf Multi Handicapped Daughter (34 years old) it is important to me as a single parent that my daughter someday can live in a loving place in the neighborhood she has grown up in. The 10 year wait lists, the reality of adults with limited mental capacities being told they must locate and arrange for their own housing (on a total income of \$700 a month!) Over the past year, however, I and friends from the new 5013-c organization FULLER LIVES, have been researching the causes and possible solution of this housing dilemma.

Working at the Hawaii Kai Holiday Retirement, as the Resident Experience Coordinator, we have over 400 residents from Assisted to Regular Living from in the complex or in our cottages. One exciting glimmer to these residents are the days we have Special Ed Students come from Kaiser and Kalani High School. These Students help set tables, read to the seniors, play bingo, help them with arts and crafts and the lists on. Barbara Poole Street and we head up the largest Hawaii Special Olympics Group, called the Mighty Ducks – over 145 Special athletes. The word spread fast and our olde "Ducks" have come and attached themselves to the residents from walking with them, assisting them putting puzzles together, making a favor for a Holiday....and many other things! How wonderful!!!!!!

Could we review policies to increase the availability of housing for our citizens with IDD.

Many of the Senior Affordable Apartments do have rents that would be affordable; however, the age requirement prohibits our middle aged family member with IDD from living there, despite the well-known fact that generally folk with IDD age faster than the general population—so that someone with IDD in his 50's can have more age-related disabilities that his typical father in his 70's!

What about Senior Affordable Housing with our Special Population...I see it daily how wonderful this could work. Why not have model and put us on the Map!!

Sincerely,

Valery O'Brien
Resident Experience Coordinator
Holiday Retirement
808.395.9599

RECEIVED
HAWAII HOUSING FINANCE
DEVELOPMENT CORP
2018 SEP 20 A 10:58

DAVID Y. IGE
GOVERNOR



CRAIG K. HIRAI
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

19:PECB/08

January 22, 2019

Ms. Susan Berk
Ms. Valery O'Brien
Fuller Lives Foundation
1075 Kamookoa Place
Honolulu, Hawaii 96825

Dear Ms. Berk and Ms. O'Brien,

RE: Public Testimony, PY2019 Annual Action Plan

Thank you for your attendance at our public hearing, and for your testimony expressing the continued need for affordable housing options for persons with intellectual or developmental disabilities. A summary of your comments will be included in the State of Hawaii's PY2019-20 Annual Action Plan.

Under the state's Consolidated Plan Annual Action Plan, housing for special needs populations is eligible for consideration of funding under the HOME Investment Partnerships (HOME) program and the National Housing Trust Fund (HTF) program. HHFDC's HOME program funds are focused in the neighbor island counties and distributed by county housing agencies under a competitive process to owners or developers of eligible affordable rental or homeownership housing activities. HHFDC's HTF program funds are annually allocated to the City and County of Honolulu and one neighbor island county; each county housing agency distributes HTF funds under a process similar to the HOME program.

We appreciate your efforts to educate the community and stakeholders on the current and future housing needs of this population, and suggest further outreach to Legislators, the Department of Human Services' MedQUEST Division, and owners and developers of affordable housing.

Thank you for your input and support of affordable housing opportunities for Hawaii's residents.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig K. Hirai".

Craig K. Hirai
Executive Director



Chaminade University

O F H O N O L U L U

Testimony for Consideration in the Annual Action Plan for Program Year 2018-19

To the members of the HHFDC Planning and Evaluation Office

RECEIVED
HAWAII HOUSING FINANCE
DEVELOPMENT CORP.
2018 SEP 20 A 10:58

Last year I submitted testimony to this body, noting how the shortage of community housing for our adult children with Intellectual Developmental Disabilities (IDD) prevents the state from keeping their promises made to parents that their children have homes in their familiar communities when needed. I attach that testimony to this statement, as the situation largely remains the same. The 10 year wait lists, the reality of adults with limited mental capacities being told they must locate and arrange for their own housing (on a total income of \$700 a month!) because the social worker can find not one available place on this island, continues. And more aging parents are worrying about what will happen to their children.

Over this past year, however, I and friends from the new 5013-c organization FULLER LIVES, have been researching the causes and possible solution of this housing dilemma. Let me list some of our findings here:

1. Domiciliary homes are seen as quite difficult to start: the licensing requirements and regulatory oversight seem oppressive to people who are looking into in starting a home. I can testify to that firsthand, as I am seeking licensure to turn my family home into a IDD home. But these issues are outside of your scope of responsibilities, and need not be addressed in this venue.
2. Domiciliary Homes are not always the best placement for an adult with IDD, for the goal is to provide the least restrictive setting. Apartment living with appropriate and needed services is often a better fit.
3. There are very few apartments available that our adults with IDD, many of which live on \$700 a month plus food stamps, can afford. Programs that offer reduced rent (HUD programs, city and state programs, public housing) often have such lengthy wait lists that they are not accepting applications. "Affordable Housing" units available still are often unaffordable to our population. Calling around apartment complexes listed as "affordable on a government web site, I did find two that had units available. One was a two bedroom for \$1,500 a month. The other was a one bedroom for \$1,375 but with a MINIMUM income requirement of \$3,360 a MONTH!

4. Many of the Senior Affordable Apartments do have rents that would be affordable ; however, the age requirement prohibits our middle aged family members with IDD from living there, despite the well -known fact that generally folk with IDD age faster than the general population-- so that someone with ID in his 50's can have more age-related disabilities than his typical father in his 70's! As I spoke to apartment managers in my informal survey, one told me that he had a situation where an older family member was caring for a woman with IDD. When the older caregiver died, the manager had to evict the younger woman because she was only 58
5. The age restrictions HUD places upon units are largely non-negotiable and cannot be waived.
6. The restrictions regarding age and other factors in city and state provided housing, I was told, are generally determined by the HHFDC. Changing certain of these could improve the amount of housing available to people with Intellectual Developmental Delays.

With this limited knowledge and insight, I urge to review your policies to increase the availability of housing for our citizens with IDD . One simple change I would suggest would be to allow them to take advantage of programs available to seniors regardless of age. Logically, the reason to offer seniors preference in housing is because they have greater needs than younger, supposedly healthier individuals. But are their needs really greater than someone who has been disadvantaged intellectually since birth? Shouldn't they at least be treated equally?

Reading your criteria for evaluating proposals that come before you, I note that extra points are given for applicants who will advertise vacancies and take applications among the homeless and people who are on wait lists for public housing. Couldn't people with IDD be accorded the same status? So that applicants for your programs have an incentive to offer this overlooked population?

I understand that this is a complex issue, and that to resolve it will require the involvement and cooperation of many agencies, including DOH and HHS. But your agency has the opportunity to make some changes that will improve the situation, and hope you will seriously consider doing so. There are too many people who are being put at risk by the present lack of housing.

Sincerely,



Barbara Poole-Street, Ph.D.
Emeritus Professor of Economics
Chaminade University



Chaminade University

OF HONOLULU

Testimony for Consideration in the Annual Action Plan for Program Year 2018-19

To the members of the HHFDC Planning and Evaluation Office

I am a retired economics professor and the mother of a 41 year old son with Down Syndrome, who will have life-long dependency on others. I find that I share the same concern with other parents of adults with special needs: where will my child live when I am no longer able to care for him?

When my child was younger I was told that with the elimination of institutions, there would be homes in the community for our children when needed. However, that does not seem to be the case now that my child and others are reaching the age to need new living situations. Putting his name on the wait list of providers, I was told the average wait time is 10 years. My social worker tells me the scarcity of providers able and willing to serve our population means that they often place clients in non-licensed homes. My son's friend needed a place to live, but the social worker was unable to locate any home at all for her. Ultimately, I took the friend into my home until she was able to locate a suitable place to live. Two years later, she is now moving out, only because other kind people are taking her in out of the goodness of their hearts. I know of other individuals who are similarly sheltering those with no other options. This was not intended nor promised when the institutions were closed. Society has an obligation to provide them with a safe and secure place to live.

This cannot happen unless there are structures made available to meet this need. This population cannot access market based housing. We need the HHFDC to regard the needs of this population in their planning.

I would be glad to share more information with you if it would be helpful.

Sincerely,

Barbara Poole-Street, Ph.D.
Professor Emeritus
Chaminade University

808 358-4292

DAVID Y. IGE
GOVERNOR



CRAIG K. HIRAI
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM

HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300

Honolulu, Hawaii 96813

FAX: (808) 587-0600

IN REPLY REFER TO:

19:PECB/07

January 22, 2019

Barbara Poole-Street, Ph.D.
Emeritus Professor of Economics
Chaminade University of Honolulu
3140 Waialae Avenue
Honolulu, Hawaii 96816-1578

Dear Dr. Poole-Street:

RE: Public Testimony, PY2019 Annual Action Plan

Thank you for your attendance at our public hearing, and for your testimony expressing the continued need for affordable housing options for persons with intellectual or developmental disabilities. A summary of your comments will be included in the State of Hawaii's PY2019-20 Annual Action Plan.

Under the state's Consolidated Plan Annual Action Plan, housing for special needs populations is eligible for consideration of funding under the HOME Investment Partnerships (HOME) program and the National Housing Trust Fund (HTF) program. HHFDC's HOME program funds are focused in the neighbor island counties and distributed by county housing agencies under a competitive process to owners or developers of eligible affordable rental or homeownership housing activities. HHFDC's HTF program funds are annually allocated to the City and County of Honolulu and one neighbor island county; each county housing agency distributes HTF funds under a process similar to the HOME program.

One point you made in your written testimony, concerning HHFDC's ability to determine age restrictions in projects, is incorrect. Generally, one of three definitions of "elderly" for a senior project receiving federal or state funding is determined by the owner of a project, pursuant to 42 United States Code Section 3607(b)(2):

1. Any federal or state program for which the Secretary of HUD has issued a waiver: programs that currently have a waiver are Rural Development, public housing, and HUD 4350.3 elderly programs.
2. 62 and older: every member of the household must be 62 or older. No children or persons with disabilities under the age of 62 are eligible.


Barbara Poole-Street Ph.D.
January 22, 2019
Page 2

3. 55 and older: at least one person in 80% of the units at all times must be 55 and older.

We appreciate your efforts to educate the community and stakeholders on the current and future housing needs of this population, and suggest further outreach to Legislators, the Department of Human Services' MedQUEST Division, and owners and developers of affordable housing.

Thank you for your input and support of affordable housing opportunities for Hawaii's residents.

Sincerely,



Craig K. Hirai
Executive Director

HOME Investment Partnerships - ATTACHMENT A

PY2019 HOME Funds and Activities

Referenced in AP-35, Projects

PY2019 HOME FUNDS AND ACTIVITIES

HOME Resources	County of Hawaii	County of Kauai	County of Maui	HHFDC	Total
FY2019 HOME					
• Regular Project	\$0	\$2,256,104.00	\$0	\$0	\$2,256,104.00
• CHDO Set-Aside	\$0	\$451,221.00	\$0	\$0	\$451,221.00
• Administration	\$0	\$150,406.00	\$0	150,407.00	\$300,813.00
Subtotal – 2019 HOME Funds	\$0.00	\$2,857,731.00	\$0.00	\$150,407.00	\$3,008,138.00
Other HOME Funds					
• Program Income Balance	\$0	\$0	\$0	\$0	\$0.00
• Anticipated Program Income in PY2019	\$50,000	\$0	\$0	\$0	\$50,000.00
Subtotal – Other HOME Funds	\$50,000.00	\$0.00	\$0	\$0	\$50,000.00
Total Available	\$50,000.00	\$2,857,731.00	\$0.00	\$150,407.00.00	\$3,058,138.00

Italics = HOME Program Income

Anticipated HOME Activity	County of Hawaii	County of Kauai	County of Maui	HHFDC	TOTAL
HR-1: Construct New or Rehabilitate Existing Affordable Rental Housing	\$0	\$2,256,104.00 Pua Loke Aff. Rentals (Lihue)	\$0	\$0	\$2,256,104.00
CHDO Activity	\$0	\$451,221.00* (CHDO Project TBD)	\$0	\$0	\$451,221.00
HR-2: Tenant Based Rental Assistance (Anticipated PI)	\$50,000.00	\$0	\$0	\$0	\$50,000.00
HA-1: Administration	\$0	\$150,406.00	\$0	\$150,407.00	\$300,813.00
Total	\$50,000.00	\$2,857,731.00	\$0.00	\$150,407.00	\$3,058,138.00

Italics = HOME Program Income.

* Represents the PY2019 CHDO set-aside. At this writing, an eligible CHDO activity has not been determined. The County of Kauai is working to identify a CHDO activity for PY2019. Once selected, the PY2019 AAP will be amended to include the PY2019 CHDO activity.

NATIONAL HOUSING TRUST FUND - ATTACHMENT A

PY2019 HTF Allocation Plan

(subject to HUD's approval)

**Referenced in AP-05 Executive Summary,
AP-25 Allocation Priorities, AP-35 Projects, and
AP-90 Program Specific Requirements**

STATE OF HAWAII
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
HOUSING TRUST FUND PROGRAM
ALLOCATION PLAN

I. INTRODUCTION

The Housing Trust Fund (HTF) program was created by Title I of the Housing and Economic Recovery Act of 2008, Section 1131 (Public Law 110-289) and is administered by the U.S. Department of Housing and Urban Development. The regulations which govern the HTF are contained in 24 CFR Part 93, Housing Trust Fund. The purpose of the HTF is to provide grants to State governments to increase and preserve the supply of decent, safe, and sanitary affordable housing for primarily extremely low-income (30% AMI) households, including homeless families. The Hawaii Housing Finance and Development Corporation (HHFDC) is designated as the HTF Grantee for the State of Hawaii.

II. DISTRIBUTION OF FUNDS

The Consolidated Plan identifies a substantial need for affordable housing throughout the State of Hawaii. Consequently, the HHFDC will make its allocation of HTF funds available on a statewide basis. HHFDC will fund projects through subgrantees (a unit of general local government that is selected to administer all or a portion of the state HTF program). The annual distribution is described below:

- a. HHFDC will retain 5% of the HTF annual allocation for allowable administrative and planning expenses.
- b. The balance of the HTF annual allocation will be split (50/50) between the City and County of Honolulu and the designated neighbor island county that receives HHFDC's rotated HOME allocation, (Subgrantees); for PY2019, the City and County of Honolulu and the County of Kauai are anticipated to receive the HTF allocation; the next neighbor island allocation would be received by the County of Maui in PY2020.
- c. The HTF program requires HHFDC to commit funds within 24 months of HUD's execution of the HTF grant agreement. Should a Subgrantee be unable to identify an eligible HTF project(s) and/or complete the tasks to meet the commitment requirements within a specified timeframe, HHFDC, in its sole discretion, shall seek alternate activities from the remaining Subgrantees.
- d. Should the remaining Subgrantees be unable to identify an eligible HTF project(s) and/or complete the tasks to meet the commitment requirements within a specified timeframe, HHFDC, in its sole discretion, shall seek alternate activities from eligible recipients.

- e. The HHFDC anticipates receiving \$3,000,000 in HTF funds for the Program Year 2019 – 2020, to be distributed as follows:

Program Year 2019 – 2020				
Fund Type	City and County of Honolulu	County of Kauai	HHFDC	Total
HTF Project Funds	\$1,350,000	\$1,350,000	\$0	\$2,700,000
Administration	\$75,000	\$75,000	\$150,000	\$300,000
Total HTF Funds	\$1,425,000	\$1,425,000	\$150,000	\$3,000,000

III. ELIGIBLE ACTIVITIES AND EXPENSES

Rental Housing - HHFDC will focus its HTF funds on providing affordable rental housing to 30% AMI households. HTF funds may be used for the production, preservation, and rehabilitation of affordable rental housing through the acquisition, new construction, reconstruction, or rehabilitation of nonluxury housing with suitable amenities.

Eligible activities and expenses include: real property acquisition, site improvements and development hard costs, related soft costs, conversion, demolition, financing costs, relocation assistance, operating cost assistance and reasonable administrative and planning costs for HTF program administration.

HHFDC does not intend to use HTF funds for refinancing of existing debt.

IV. ELIGIBLE RECIPIENTS

An organization, agency or other entity (including a public housing agency, or a for-profit entity or a nonprofit entity) is eligible to apply for HTF assistance as an owner or developer to carry out an HTF-assisted project. A recipient must:

- a. Make acceptable assurances to the Subgrantee/HHFDC that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
- b. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;

- c. Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and
- d. Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

V. APPLICATION AND AWARD PROCESS

Applications for the HTF are issued, accepted and selected by the applicable county housing agencies (Subgrantees) annually for funding consideration, subject to availability of funds. Should Subgrantees be unable to identify an eligible HTF project(s) within a specified timeframe, HHFDC shall seek alternate activities from eligible recipients. Applications are reviewed for eligibility and rated using the selection criteria. Each application must describe the eligible activity, in accordance with 24 CFR 93.200, to be conducted with HTF funds and contain a certification by each eligible recipient that housing units assisted with HTF will comply with the HTF requirements.

In addition, applications will include performance goals and bench marks that the Subgrantees/HHFDC will use to monitor efforts to accomplish the rental housing objectives.

STATE OF HAWAII SUBGRANTEES

City and County of Honolulu	County of Kauai
Department of Community Services	Kauai County Housing Agency
Kapalama Hale, Suite 200	Pi'ikoi Building
925 Dillingham Boulevard	4444 Rice Street, Suite 330
Honolulu, Hawaii 96817	Lihue, Hawaii 96766
County of Hawai'i	County of Maui
Office of Housing and Community Development	Department of Housing and Human Concerns
1990 Kinoole Street, Suite 102	2065 Main Street, Suite 108
Hilo, Hawaii 96720	Wailuku, Hawaii 96793

For PY 2019, the applicable Subgrantees to issue the HTF applications are the City and County of Honolulu and the County of Kauai.

Minimum Thresholds:

Applicants must meet all of the following Minimum Threshold requirements to receive consideration for an allocation or award of HTF.

Failure to meet any Minimum Threshold shall result in the immediate rejection of the application.

1. **Market Assessment**
A market assessment of the housing needs of extremely low income individuals to be served by the project must be submitted as a part of the application. The assessment should review the neighborhood and other relevant market data to determine that there is current demand for the type and number of housing units being developed.
2. **Site Control**
Evidence of site control shall be submitted with the application for HTF funds. Site control shall be substantiated by providing evidence in the form of an executed lease or sales option agreement, fee simple deed, executed land lease, or any other documentation acceptable to the County. Evidence of site control must be provided for all proposed sites.
3. **Capital Needs Assessment (For projects acquiring an existing property.)**
To ensure that the proposed rehabilitation of the project is adequate and that the property will have a useful life that exceeds the affordability period, a capital needs assessment of the property by a competent third party shall be submitted with the application. A capital needs assessment is a qualified professional's opinion of a property's current physical condition. It identifies deferred maintenance, physical needs and deficiencies, and material building code violations that affect the property's use, structural and mechanical integrity, and future physical and financial needs. The Capital Needs Assessment shall identify any work that must be completed immediately to address health and safety issues, violation of Federal or State law, violation of local code, or any work necessary to ensure that the building can continue to operate as affordable housing.
4. **Debt Service Ratio**
 - a. **Projects with hard debt service requirements:**
 - i. The Project is required to evidence a Debt Service Ratio of no less than 1.15x on all hard debt service requirements for the first 15 years.
 - b. **Projects with no hard debt service requirements:**
 - i. The Project is required to evidence positive Net Operating Income throughout the 30-year proforma period.
 - c. **Hard Debt Service:**
 - i. Defined as scheduled regular and periodic principal and/or interest payments of project loan obligations made for its direct benefit, as evidenced by a note and loan agreement.
 - ii. The Applicant is required to support all hard debt service loans and

terms with executed lenders' commitment letters, letters of interest, or term sheets.

d. Underwriting Criteria and Requirements:

- i. Applicants are required to use the following parameters and assumptions in the preparation of the project proforma:
 1. Annual Income Inflation Rate of 2.0% and Annual Expense Inflation Rate of 3.0% for the first 15 years or term of the first mortgage, whichever is greater.
 2. Annual Income Inflation Rate of 2.0% and Annual Expenses Inflation Rate of 2.0% for the remaining term of affordability.
 3. Vacancy Rate of no less than 5.0%
 4. Annual Replacement Reserve Allocation of no less than \$300 per unit per year.

5. Phase I Environmental Site Assessment

All proposed multifamily (more than four housing units) HTF projects require a Phase I Environmental Site Assessment.

For acquisition/rehabilitation projects, the Phase I Environmental Assessment should address lead based paint and asbestos.

6. Developer Fee

- i. New Construction – maximum developer fee of 15% of the total development costs or \$3,750,000 (whichever is less)
- ii. Acquisition/Rehabilitation – maximum developer fee of 10% of the acquisition costs and 15% of the rehabilitation costs or \$3,750,000 (whichever is less).

VI. SELECTION CRITERIA

- a. Timeliness and Readiness to Proceed (Max. 30 pts.) – The proposed project is feasible and will meet the required timelines to commit and expend HTF funds. Applicants need to demonstrate project “readiness.” Factors to be considered are site control, financial commitments, environmental factors, zoning, utilities and site and neighborhood standards;
- b. Consolidated Plan Priorities (Max. 10 pts.) - The extent to which the project proposes accomplishments that will meet the rental housing objectives for both the HHFDC and the County. The HTF is primarily a production program meant to add units to the supply of affordable housing for extremely low-income households. Merits of the application in meeting the priority housing needs of the County where the project is located such as accessible to transit or employment centers, housing that includes green building and sustainable development features or housing that serves special needs populations;

- c. Developer Experience and Financial Capacity (Max. 25 pts.) - Applicant's ability to obligate HTF dollars and undertake funded activities in a timely manner. Need to review evidence of experience in developing and managing projects of similar type and scope, staff qualifications, and fiscal soundness. In addition, applicants who have received federal funds in the past will be evaluated on the basis of their past performance. Qualifications of the proposed project team, personnel and /or contractors to carry out the proposed project including proven record of experience with comparable projects;
- d. Financially Feasible Project (Max. 25 pts.) – Project pro forma to cover a minimum 30 year HTF affordability period and include rents that are affordable to extremely low-income households. Priority to be given for projects with extended affordability periods and project based rental assistance; and
- e. Use of Non-Federal Funding Sources (Max. 10 pts.) – Given the 30% AMI income targeting requirements, viable projects will require other funding sources compatible with HTF. Priority consideration to the extent project will use non-federal funding sources.

A minimum score of 50 points (out of the 100 total points) must be scored in order to be recommended for the award of HTF funds.

Successful Recipient(s) will receive a Notice of Award, which will state that the Subgrantee's intent to award HTF funds is subject to approval of the applicable HTF Allocation Plan/Action Plan by the County Council/Approving Authority, HHFDC and HUD.

VII. MAXIMUM PER-UNIT DEVELOPMENT SUBSIDY LIMITS

Each year, HHFDC must establish maximum limitations on the total amount of HTF funds that may be invested per-unit for development of non-luxury rental housing projects. The Public Housing Development Cost Limits (TDCs) for elevator structures, as annually established by HUD, have been adopted for the HTF program. HUD's data is based on construction cost indices for the area and is published annually by HUD's Office of Public and Indian Housing. The development costs of affordable rental housing across the state are generally higher in comparison but the TDCs provide a reliable maximum subsidy limit which will produce a greater number of HTF assisted units throughout the state. The limits are applicable statewide but, in the future, should HUD's data indicate that costs vary significantly across the state, the limits may be adjusted accordingly.

The following table reflects the maximum per unit subsidy limits by bedroom size for housing assisted with HTF within the State of Hawaii, for PY 2019.

Bedrooms	PY2019 HTF Maximum Per-Unit Subsidy Limit
0	\$177,886
1	\$249,041
2	\$320,196
3	\$426,927
4+	\$533,659

VIII. REHABILITATION STANDARDS

Rehabilitation of multi-family projects that utilize HTF funds must comply with all applicable federal, state and local codes, ordinances, requirements, County HTF rehabilitation standards and the requirements of 24 CFR 93.301(b). At a minimum, the following property standards and requirements shall apply:

- 1) Health and Safety – If the housing is occupied at the time of initial inspection, all Life-Threatening Deficiencies must be identified and addressed immediately. See Appendix A which identifies all life-threatening deficiencies (Highlighted in yellow and bold) for the property site, building exterior, building systems, common areas and unit components.
- 2) Major Systems – All projects with 26 or more units are required to have the useful remaining life of the major systems determined with a capital needs assessment. Major systems include: structural support, roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; heating, ventilation, and air conditioning. If the useful life of one or more major system is less than the affordability period, it must be replaced or rehabilitated or a replacement reserve must be established and monthly deposits made to the reserve account to adequately repair or replace the systems as needed.
- 3) Lead Safe Housing Rule – All HTF-funded rehabilitation must meet the requirements of the Lead Safe Housing Rule at 24 CFR Part 35.
- 4) Accessibility – Assisted housing must meet the accessibility requirements at 24 CFR part 8 (implementing section 504 of the Rehabilitation Act of 1973) and Titles II and III of the Americans with Disabilities Act implemented at 28 CFR parts 35 and 36. For “covered multifamily dwellings,” as defined at 24 CFR 100.205, standards must require that the housing meets the design and construction requirements at 24 CFR 100.205. (Note that grantees may use HTF funds for other improvements that permit use by a person with disabilities, even if they are not required by statute or regulation.)

5) Disaster Mitigation – Housing must meet state and local requirements for disaster mitigation, or requirements established by HUD, where they are needed to mitigate the risk of potential natural disasters.

6) Local/state or national codes - All rehabilitation projects must meet all applicable federal, state and local codes, standards, ordinances, rules, regulations and requirements by project completion. In cases where standards differ, the most restrictive standard will apply. The State of Hawaii has adopted the 2006 International Building Code (2006 IBC) and the 2006 International Energy Conservation Code (2006 IECC). Should the adopted codes be modified or updated, the newly adopted code standard will apply. See local government agencies for additionally adopted codes. In the absence of local building codes, the housing must meet the International Existing Building Code of the International Code Council.

7) Uniform Physical Condition Standards (UPCS) – Upon completion, the project and units must be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation (“Appendix A”) identifies the type and degree of deficiencies that shall be addressed.

Uniform Physical Condition Standards (UPCS) for Multifamily Housing Rehabilitation

All projects funded with HTF will be required to meet HUD's UPCS to ensure housing will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. Standards include the UPCS inspectable items and observable deficiencies for the site, building exterior, building systems, common areas, and units.

Inspectable Item	Observable Deficiency	Type and Degree of Deficiency That Must Be Addressed
NOTE: Deficiencies highlighted in yellow are life-threatening and must be addressed immediately if the housing is occupied.		
Requirements for Site:		
Fencing and Gates	Damaged/Falling/Leaning	An exterior fence, security fence, or gate is damaged and does not function as it should or could threaten safety or security.
	Holes	Hole in fence or gate is larger than 6 inches by 6 inches
	Missing Sections	An exterior fence, security fence or gate is missing a section which could threaten safety or security
Grounds	Erosion/Rutting Areas	Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or threatens the safety of pedestrians or makes the grounds unusable or there is a rut larger than 8 inches wide by 5 inches deep.
	Overgrown/Penetrating Vegetation	Plants have visibly damaged a component, area or system of the property or has made them unusable or unpassable
	Ponding/Site Drainage	There is an accumulation of more than 5 inches deep and/or a large section of the grounds-more than 20%-is unusable for its intended purpose due to poor drainage or ponding
Health & Safety	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)

	Electrical Hazards - Water Leaks on/near Electrical Equipment	Water leaking, puddling, or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
Mailboxes/Project Signs	Mailbox Missing/Damaged	Mailbox cannot be locked or is missing
	Signs Damaged	The project sign is not legible or readable because of deterioration or damage
Parking Lots/ Driveways/Roads	Cracks	Cracks that are large enough to affect traffic ability over more than 5% of the property's parking lots/driveways/roads or pose a safety hazard

	Ponding	3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe
	Potholes/Loose Material	Potholes or loose material that have made a parking lot/driveway unusable/unpassable for vehicles and/or pedestrians or could cause tripping or falling
	Settlement/Heaving	Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles
Play Areas and Equipment	Damaged/Broken Equipment	Equipment poses a threat to safety and could cause injury

	Deteriorated Play Area Surface	More than 50% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk
Refuse Disposal	Broken/Damaged Enclosure-Inadequate Outside Storage Space	A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal
Retaining Walls	Damaged/Falling/Leaning	A retaining wall is damaged and does not function as it should or is a safety risk
Storm Drainage	Damaged/Obstructed	The system is partially or fully blocked by a large quantity of debris, causing backup into adjacent areas or runoffs into areas where runoff is not intended
Walkways/Steps	Broken/Missing Hand Railing	The hand rail for four or more stairs is missing, damaged, loose or otherwise unusable
	Cracks/Settlement/Heaving	Cracks greater than $\frac{3}{4}$ ", hinging/tilting, or missing section(s) that affect traffic ability over more than 5% of the property's walkways/steps
	Spalling/Exposed rebar	More than 5% of walkways have large areas of spalling-larger than 4 inches by 4 inches--that affects traffic ability
Requirements for Building Exterior:		
Doors	Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
	Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
	Damaged Surface (Holes/Paint/Rusting/Glass)	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
	Damaged/Missing Screen/Storm/Security Door	A security door that is not functioning or is "missing" (Security door should be there but isn't there)
	Deteriorated/Missing Caulking/Seals	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Missing Door	Any exterior door that is missing
Fire Escapes	Blocked Egress/Ladders	Stored items or other barriers restrict or block people from exiting

	Visibly Missing Components	Any of the functional components that affect the function of the fire escape--one section of a ladder or railing, for example--are missing
Foundations	Cracks/Gaps	Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart
	Spalling/Exposed Rebar	Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material—rebar or other

Health and Safety	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable/Combustible Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Outdoors	Too much garbage has gathered--more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects--including roaches and ants--throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk

Lighting	Broken Fixtures/Bulbs	20% or more of the lighting fixtures and bulbs surveyed are broken or missing
Roofs	Damaged Soffits/Fascia	Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible
	Damaged Vents	Vents are missing or so visibly damaged that further roof damage is possible
	Damaged/Clogged Drains	The drain is so damaged or clogged with debris that the drain no longer functions—as shown by ponding
	Damaged/Torn Membrane/Missing Ballast	Ballast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration
	Missing/Damaged Components from Downspout/Gutter	Drainage system components are missing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior
	Missing/Damaged Shingles	Roofing shingles are missing or damaged enough to create a risk of water penetration
	Ponding	Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials
Walls	Cracks/Gaps	Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration
	Damaged Chimneys	Part or all of the chimney has visibly separated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard
	Missing/Damaged Caulking/Mortar	Any exterior wall caulking or mortar deterioration that presents a risk of water penetration or risk of structural damage

	Missing Pieces/Holes/Spalling	Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage
	Stained/Peeling/Needs Paint	More than 50% of the exterior paint is cracking, flaking, or otherwise deteriorated. Water damage or related problems have stained the paint.
Windows	Broken/Missing/Cracked Panes	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane

	Damaged Sills/Frames/Lintels/Trim	Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness
	Damaged/Missing Screens	Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length
	Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure
	Peeling/Needs Paint	More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration
	Security Bars Prevent Egress	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks
Requirements for Building Systems		
Domestic Water	Leaking Central Water Supply	Leaking water from water supply line is observed
	Missing Pressure Relief Valve	There is no pressure relief valve or pressure relief valve does not drain down to the floor
	Rust/Corrosion on Heater Chimney	The water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from the chimney
	Water Supply Inoperable	There is no running water in any area of the building where there should be
Electrical System	Blocked Access/Improper Storage	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	Missing Breakers/Fuses	Any open and/or exposed breaker port
	Missing Outlet Covers	A cover is missing, which results in exposed visible electrical connections

Elevators	Not Operable	The elevator does not function at all or the elevator doors open when the cab is not there
Emergency Power	Auxiliary Lighting Inoperable (if applicable)	Auxiliary lighting does not function
Fire Protection	Missing Sprinkler Head	Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped
	Missing/Damaged/Expired Extinguishers	There is missing, damaged or expired fire extinguisher in any area of the building where a fire extinguisher is required

Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Water leaking, puddling, or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Elevator - Tripping	An elevator is misaligned with the floor by more than 3/4 of an inch. The elevator does not level as it should, which causes a tripping hazard
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury

	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards – Tripping Hazards	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
HVAC	Boiler/Pump Leaks	Evidence of water or steam leaking in piping or pump packing to the point that the system or pumps should be shut down.
	Fuel Supply Leaks	Evidence of any amount of fuel leaking from the supply tank or piping
	General Rust/Corrosion	Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticeable pit or crevice
	Misaligned Chimney/Ventilation System	A misalignment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable	The roof exhaust fan unit does not function
Sanitary System	Broken/Leaking/Clogged Pipes or Drains	Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding--a sign of leaks or clogged drains
	Missing Drain/Cleanout/Manhole Covers	A protective cover is missing
Requirements for Common Areas		
Basement/Garage/Carport	Baluster/Side Railings - Damaged	Any damaged or missing balusters or side rails that limit the safe use of an area

Closet/Utility/Mechanical	Cabinets - Missing/Damaged	More than 10% of cabinet, doors, or shelves are missing or the laminate is separating
Community Room	Call for Aid - Inoperable	The system does not function as it should
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long

Kitchen	Ceiling - Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 square foot
Lobby	Countertops - Missing/Damaged	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate-not a sanitary surface to prepare food
Office	Dishwasher/Garbage Disposal - Inoperable	The dishwasher or garbage disposal does not operate as it should
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel, or trim.
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks	A restroom door, entry door, or fire door that does not function as it should or cannot be locked because of damage to the door's hardware
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
Storage	Doors - Damaged/Missing Screen/Storm/Security Door	Any security door that is not functioning or is missing
	Doors - Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Doors - Missing Door	Any door that is missing that is required for the functional use of the space
	Dryer Vent - Missing/Damaged/Inoperable	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside
	Electrical - Blocked Access to Electrical Panel	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Electrical - Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Electrical - Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Electrical - Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire

	Electrical - Missing Breakers	Any open and/or exposed breaker port
	Electrical - Missing Covers	A cover is missing, which results in exposed visible electrical connections
	Floors - Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floors - Floor Covering Damaged	More than 50% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Floors - Missing Floor/Tiles	More than 50% of the flooring or tile flooring is missing
	Floors - Peeling/Needs Paint	Any painted flooring that has peeling, cracking, flaking, or missing paint if the affected area is more than 4 square feet
	Floors - Rot/Deteriorated Subfloor	Large areas of rot--more than 4 square feet--and applying weight causes noticeable deflection.
	Floors - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 square foot

	GFI - Inoperable	The GFI does not function
	Graffiti	Graffiti in 6 or more places
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans
	HVAC - General Rust/Corrosion	Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice
	HVAC - Inoperable	HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged
	HVAC - Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases
	HVAC - Noisy/Vibrating/Leaking	HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged
	Lavatory Sink - Damaged/Missing	The sink or associated hardware have failed or are missing. The sink cannot be used
	Lighting - Missing/Damaged/Inoperable Fixture	In more than two rooms, permanent lighting fixtures are missing or not functioning and no other switched light source is functioning in the room

	Mailbox - Missing/Damaged	The U.S Postal Service mailbox cannot be locked or is missing
	Outlets/Switches/Cover Plates - Missing/Broken	Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring
	Pedestrian/Wheelchair Ramp	A walkway or ramp is damaged and cannot be used by people on foot, in wheelchairs, or using walkers
	Plumbing - Clogged Drains	Drain is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Range Hood /Exhaust Fans - Excessive Grease/Inoperable	The exhaust fan does not function
	Range/Stove - Missing/Damaged/Inoperable	Two or more burners are not functioning or oven is not functioning
	Refrigerator - Damaged/Inoperable	The refrigerator does not cool adequately for the safe storage of food
	Restroom Cabinet - Damaged/Missing	Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Shower/Tub - Damaged/Missing	The shower or tub cannot be used for any reason. The shower, tub, faucets, drains, or associated hardware is missing or has failed.
	Sink - Missing/Damaged	The sink or hardware is either missing or not functioning
	Smoke Detector - Missing/Inoperable	Smoke detector is missing or does not function as it should
	Stairs - Broken/Damaged/Missing Steps	A step is missing or broken
	Stairs - Broken/Missing Hand Railing	The hand rail for 4 or more stairs is missing, damaged, loose or otherwise unusable
	Ventilation/Exhaust System - Inoperable	Exhaust fan is not functioning or window designed for ventilation does not open
	Walls - Bulging/Buckling	Bulging, buckling or sagging walls or a lack of horizontal alignment
	Walls - Damaged	Any hole in the wall greater than 2 inches by 2 inches
	Walls - Damaged/Deteriorated Trim	More than 50% of the wall trim has significant areas of deterioration

	Walls - Peeling/Needs Paint	Peeling, cracking, flaking, or otherwise deteriorated paint over more than 4 square feet on any wall
	Walls - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew--such as a common area--covering a wall area greater than 1 square foot
	Water Closet/Toilet - Damaged/Clogged/Missing	The bowl is fractured or broken and cannot take in water, water closet/toilet cannot be flushed, because of obstruction or another defect or there is a hazardous condition
	Windows - Cracked/Broken/Missing Panes	Missing or cracked panes of glass
	Windows - Damaged Window Sill	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness
	Windows - Inoperable/Not Lockable	Any window that is not functioning or cannot be secured because lock is broken
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure
	Windows - Peeling/Needs Paint	More than 10% of interior window paint is cracking, flaking or otherwise failing
	Windows - Security Bars Prevent Egress	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit

	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable/Combustible Materials - Improperly Stored	Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk

Pools and Related Structures	Fencing - Damaged/Not Intact	Any damage that could compromise the integrity of the fence
Trash Collection Areas	Chutes - Damaged/Missing Components	Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or components--chute, chute door, and other components--have failed
Requirements for Units:		
Bathroom	Bathroom Cabinets - Damaged/Missing	Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Lavatory Sink - Damaged/Missing	The sink cannot be used, because the sink or associated hardware is missing or has failed.
	Plumbing - Clogged Drains, Faucets	Drain or faucet is substantially or completely clogged or has suffered extensive deterioration

	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Shower/Tub - Damaged/Missing	The shower, tub, faucets, drains, or associated hardware is missing or has failed.
	Ventilation/Exhaust System – Absent/Inoperable	Exhaust fan is not functioning or window designed for ventilation does not open
	Water Closet/Toilet - Damaged/Clogged/Missing	The bowl is fractured or broken or the water closet/toilet is missing, hazardous or cannot be flushed
Call-for-Aid (if applicable)	Inoperable	The system does not function as it should
Ceiling	Bulging/Buckling/Leaking	Bulging, buckling or sagging ceiling or problem with alignment
	Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long
	Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 square foot
Doors	Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
	Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
	Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing
	Damaged Surface - Holes/Paint/Rusting/Glass/Rotting	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
	Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Missing Door	Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality
Electrical System	Blocked Access to Electrical Panel	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency

	Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components

		that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	GFI - Inoperable	The GFI does not function
	Missing Breakers/Fuses	Any open and/or exposed breaker port
	Missing Covers	A cover is missing, which results in exposed visible electrical connections
Floors	Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floor Covering Damage	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Missing Flooring Tiles	Missing or broken flooring causes a single safety problem
	Peeling/Needs Paint	Any painted flooring that has peeling, cracking, flaking, or missing paint if the affected area is more than 4 square feet
	Rot/Deteriorated Subfloor	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 square foot
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)

	Electrical Hazards - Water Leaks on/near Electrical Equipment	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
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	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
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	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
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	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk

Hot Water Heater	Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases
	Inoperable Unit/Components	Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly
	Leaking Valves/Tanks/Pipes	There is evidence of active water leaks from hot water heater or related components
	Pressure Relief Valve Missing	There is no pressure relief valve or pressure relief valve does not drain down to the floor

	Rust/Corrosion	Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice
HVAC System	Convection/Radiant Heat System Covers Missing/Damaged	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans
	Inoperable	HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged
	Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases
	Noisy/Vibrating/Leaking	The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged
	Rust/Corrosion	Deterioration from rust or corrosion on the HVAC system in the dwelling unit
Kitchen	Cabinets - Missing/Damaged	10% or more of cabinet, doors, or shelves are missing or the laminate is separating
	Countertops - Missing/Damaged	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate -- not a sanitary surface to prepare food
	Dishwasher/Garbage Disposal - Inoperable	The dishwasher or garbage disposal does not operate as it should
	Plumbing - Clogged Drains	Drain is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable	The exhaust fan does not function or you estimate that the flue may be completely blocked
	Range/Stove - Missing/Damaged/Inoperable	The unit is missing or 2 or more burners or the oven is not functioning
	Refrigerator- Missing/Damaged/Inoperable	The refrigerator is missing or it does not cool adequately for the safe storage of food
	Sink - Damaged/Missing	The sink or hardware is either missing or not functioning.
Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside
Lighting	Missing/Inoperable Fixture	A permanent light fixture is missing or not functioning, and no other switched light source is functioning in the room

Outlets/Switches	Missing	An outlet or switch is missing
	Missing/Broken Cover Plates	A cover plate is missing, which causes wires to be exposed
Patio/Porch/Balcony	Baluster/Side Railings Damaged	Any damaged or missing balusters or side rails that limit the safe use of an area
Smoke Detector	Missing/Inoperable	Smoke detector is missing or does not function as it should
Stairs	Broken/Damaged/Missing Steps	A step is missing or broken
	Broken/Missing Hand Railing	The hand rail for four or more stairs is missing, damaged, loose or otherwise unusable
Walls	Bulging/Buckling	Bulging, buckling or sagging walls or a lack of vertical alignment
	Damaged	Any hole in wall greater than 2 inches by 2 inches
	Damaged/Deteriorated Trim	10% or more of the wall trim is damaged
	Peeling/Needs Paint	10% or more of interior wall paint is peeling or missing
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew covering a wall area greater than 1 square foot
Windows	Cracked/Broken/Missing Panes	Missing or cracked panes of glass
	Damaged Window Sill	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness
	Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure
	Inoperable/Not Lockable	Any window that is not functioning or cannot be secured because lock is broken
	Peeling/Needs Paint	More than 10% of interior window paint is peeling or missing
	Security Bars Prevent Egress	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks

PY2019 HTF FUNDING AND ACTIVITIES
\$3,000,000

PY2019 HTF Allocation:

FY2019 HTF	County of Kauai	City & County of Honolulu	HHFDC	Total
Pua Loke Affordable Rental Housing Project	\$1,350,000		\$0.00	\$1,350,000.00
TBD		\$1,350,000	\$0.00	\$1,350,000.00
Administration	\$75,000.00	\$75,000.00	\$150,000.00	\$300,000.00
Total PY2018 HTF Funds	\$1,425,000.00	\$1,425,000.00	\$150,000.00	\$3,000,000.00

PY2019 HTF Activities:

HTF Activity	Location/County	HTF Funds	Est. Total Units	Est. HTF Units
Pua Loke Affordable Rental Housing Project	Lihue, Kauai	\$1,350,000	50	4
Honolulu Activity (TBD)	Honolulu, Oahu	\$1,350,000	Unknown	unknown
Admin. Kauai County	Countywide	\$75,000	n/a	n/a
Admin. C&C Honolulu	Countywide	\$75,000	n/a	n/a
Administration	Statewide	\$150,000	n/a	n/a
Total		\$3,000,000		

HTF activities are rental housing projects. HTF-assisted units will serve households with incomes at or below 30% AMI.

PY2019 HTF FUNDING AND ACTIVITIES
\$3,000,000

PY2019 HTF Allocation:

FY2019 HTF	County of Kauai	City & County of Honolulu	HHFDC	Total
Pua Loke Affordable Rental Housing Project	\$1,350,000		\$0.00	\$1,350,000.00
TBD		\$1,350,000	\$0.00	\$1,350,000.00
Administration	\$75,000.00	\$75,000.00	\$150,000.00	\$300,000.00
Total PY2018 HTF Funds	\$1,425,000.00	\$1,425,000.00	\$150,000.00	\$3,000,000.00

PY2019 HTF Activities:

HTF Activity	Location/County	HTF Funds	Est. Total Units	Est. HTF Units
Pua Loke Affordable Rental Housing Project	Lihue, Kauai	\$1,350,000	50	4
Honolulu Activity (TBD)	Honolulu, Oahu	\$1,350,000	Unknown	unknown
Admin. Kauai County	Countywide	\$75,000	n/a	n/a
Admin. C&C Honolulu	Countywide	\$75,000	n/a	n/a
Administration	Statewide	\$150,000	n/a	n/a
Total		\$3,000,000		

HTF activities are rental housing projects. HTF-assisted units will serve households with incomes at or below 30% AMI.

EMERGENCY SOLUTIONS GRANT - ATTACHMENT A

**County Plans to Address
Homeless and
Other Special Needs Populations**

And

**Partner Agencies
(Facilities and Services)**

**Referenced in
AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

COUNTY PLANS TO ADDRESS HOMELESS AND OTHER SPECIAL NEEDS POPULATIONS

County of Hawaii

Chronic homelessness is a priority of the County of Hawaii's (County) Administration. The County is a member with leadership standing in the Community Alliance Partners (CAP), the local chapter of the Continuum of Care (CoC). Additionally, the County representative actively participates in the Balance of State CoC (Bridging the Gap), and the Hawaii Interagency Council on Homelessness.

In 2017, working at the local level of the CoC, the County developed its Plan to Address Homelessness in the context of CAP's Strategic Plan. In 2018, the County continued to work the CAP membership in addressing the priority projects.

1. Worked with the CAP, BTG and its Homeless Management Information System Administrator to include Geographic Information System (GIS) mapping on the 2019 Point in Time survey. The Administrator is currently working with the County GIS representative on developing reports based on the information collected.
2. The County continues to actively work on its plans to create two (2) Assessment Centers, both with emergency shelter beds. One each will be located in West and East Hawaii. The County anticipates that the Assessment Centers (with emergency beds) will be in operations before the end of the calendar year 2019. The Assessment Centers will utilize the following:
 - a. Evidenced-based success of the current Kaka'ako Family Assessment Center, connecting people with services based on need through a one-stop center;
 - b. The village concept, creating a sense of belonging and 'ohana among the people living on the site;
 - c. Utilization of alternative shelter types that can serve as emergency shelters, as well as permanent housing.
 - d. Self-sufficiency for our homeless population is our goal.
3. The County continues to work the County and State lawmakers to increase funding for permanent housing supply: support tax-credit projects; revise property tax credits for affordable housing; facilitate accessory dwelling units; and regulate vacation rentals.

On May 3, 2018, the County began responding to the immediate needs of those impacted by the Kilauea Eruptions events. The County called upon the members of the local CoC to mobilize and activate a Resource Information and Assistance Center, to determine what needs could be met through the local and on-island voluntary and private resources. As part of the response, the County approved the construction of two (2) temporary housing sites to provide a safe place for displaced individuals who were residing in temporary emergency shelters. The first site, known as Sacred Hearts Emergency Shelter has a total of 19 residential units for single individuals, with preference given to those who are 60 years of age or older. The second site, known as Hale Iki, has a total of 10 residential units for families. Both locations provide space for community restroom and bathing facilities and cooking accommodations. The shelters have provided a safe and private space for individuals and families to work with case managers in finding permanent housing.

In 2018, the County continued with its Rural Outreach Services Initiative and partnered with monthly food distribution organizers to allow the delivery of services and resources to individuals and families who benefited from the food distributions.

In January 2018, the County submitted an application for HOME Funds for continued funding for its Tenant Based Rental Assistance (TBRA) program. The TBRA program is administered like the Housing Choice Voucher (Section 8) Program and offers application preference consideration for those experiencing homelessness, transitioning out of transitional housing or are at risk of becoming homeless. The TBRA application was approved, providing \$1M rental assistance funding during a three (3) year period.

County of Kauai

County agencies, in collaboration with local CoC and service providers, contribute greatly to the plan to end homelessness in their jurisdictions. Major efforts are described below:

The County's HOME program, in partnership with Kauai Community Alliance (KCA), continues its Tenant Based Rental Assistance (TBRA) program. This program provides rental subsidies to assist up to 15 homeless families with minor children for up to 24 months.

Kauai County, in partnership with KCA and the Kauai Board of Realtors, held a second landlord summit focusing on Fair Housing. The landlord summit focused on the following:

1. Panel: Fair Housing; Advertising Do's and Don'ts; Stigma of renting to HUD Recipients & Laws

Representation from HUD, HCRC and LASH

2. Presentation: Shared Housing: ARU's and ADU's: How to convert to legal long term rentals

Representation from County of Kauai Planning Department

3. Presentation: Low-Income Tax Exemption

Representation from County of Kauai's Real Property Tax Assessment

The Kauai County's CDBG Program has selected several agencies for award for the PY 2019 cycle. Programs include public services, acquisitions and rehabilitation work. The County's HOME Program has selected to fund its TBRA program. The County is currently in its comment period and is scheduled to go before the Council in April; all award selections are subject to Council and HUD appropriation/approval.

Kauai County's Section 8 Housing Choice Voucher (HCV) program will continue to issue vouchers to income qualifying families. The program established a new waitlist in Fall 2017 comprised of 450 families. It was anticipated that approximately 150 families would be drawn each quarter in 2018. HCV efforts will utilize revised preferences that were adopted in a revision to the HCV Administrative Rules on August 1, 2017. The revised preferences were adopted to contribute to the County's efforts to reduce homelessness and comprise (in order of hierarchy):

1. Any family that has been terminated from Kauai County's HCV program due to insufficient program funding.
2. Any family participating in Kauai County's TBRA program.
3. Any family who is considered to be living in place in an existing rental unit in Kauai County, but not currently on the HCV program.
4. Any family who is certified as being currently homeless in Kauai County by a homeless service provider, homeless shelter or participating agency in the CoC.
5. Any family who resides in Kauai County or includes a family member who works, or has been notified that they are hired to work in Kauai County.

Participating CoC agencies operate programs targeting homeless consumers, including Housing First, Rapid Re-Housing, Emergency Solutions Grant, Housing Placement Program, and Statewide Homeless Emergency Grants. Kaua'i County provides the linkages between most of these programs and consumers through the Coordinated Entry System.

County of Maui

The County of Maui (COM) is a member with leadership standing in the Maui Homeless Alliance (MHA), the local chapter of the Continuum of Care (CoC). Additionally, the COM representative actively participates in the Balance of State CoC (Bridging the Gap), and the Hawaii Interagency Council on Homelessness.

The COM attempts to provide a continuum of support for those who are at risk of homelessness and those who find themselves without housing. The County provides rental assistance funds through the county's Rental Assistant Program (RAP), to Family Life Center, Ka Hale A Ke Ola, Maui Economic Opportunity, Inc., and Women Helping Women (serving victims of domestic violence). This funding is geared toward homeless prevention and also helps to stabilize individuals and families who require security deposits and short term rental assistance. The COM also provides funding for Emergency Case Management, Hale Kau Kau (food service), and related support services programs.

Federal funding is often leveraged with state and County funding to create additional housing opportunities. Maui County's HOME and Housing Trust Fund (HTF) programs allocated funding for the 118 unit Kaiwahine Village rental housing project which broke ground in September 2018 and will be occupied by February 2020. The HTF funds target those below 30% Area Median Income Last program year, CDBG funds were awarded to Ka Hale A Ke Ola Homeless Resource Center for the rehabilitation of their homeless emergency shelter buildings.

In FY2018, Maui County's Section 8 Housing Choice Voucher program had issued 1,486 vouchers, had 257 on the waitlist, and had 1,816 call-ups. These vouchers are addressing income qualified families within the County.

The Maui County Homeless Programs Division is charged with the administration of the Coordinated Entry System (CES) within the county. Working closely with partnering non-profit agencies and governmental departments, the COM Homeless Programs Division acts as the hub, assigning homeless clients from a by-name list by priority to the appropriate agencies for housing resources and services.

The COM Homeless Programs Division has also created and implemented an interdepartmental eight (8) step Compassionate Action Plan (CAP) to address homeless encampments. COM Homeless Programs has also been working to create and implement an action plan with agencies that provide services to our homeless population, who are directly impacted by the CAP. COM Homeless Programs Division continues to seek support for our community's most vulnerable and chronically homeless families and individuals by building capacity throughout our county.

Plans are also in place to implement multiple initiatives, pending County Council's appropriations/approval for the following activities:

1. Ease restrictions on single family lots.
2. Upgrade zoning from single-family to multi-family residential usage in appropriate areas.
3. Enforce short-term rentals/transient vacation rental (TVR) codes.
4. Allow accessory dwellings on small lots for affordable rentals.

PARTNER AGENCIES (FACILITIES AND SERVICES)

HEALTH

Hawaii:

- Care Hawaii
- Bay Clinic, Inc.
- Hui Malama Ola Na Oihi
- Lokahi Treatment Centers
- Big Island Substance Abuse Council
- Hawaii County Fire Department, Emergency Medical Services Division
- Mental Health Kokua
- Hawaii State Department of Health
- Aloha Toxicology
- CHOW Project

Kauai:

- Kaua'i Community Health Center
- Malama Pono
- Department Of Health Public Nursing
- Kaua'i Medical Reserve Corps
- Aloha Care
- First Vitals Health and Wellness
- Wilcox Hospital (Pharmacy)
- CHOW Project
- Mental Health Kōkua
- Hale 'Opio

Maui:

- Aloha House
- Behavioral Health Services of Maui
- CHOW Program
- Community Clinic of Maui
- Department of Health, Dr. Lorrin Pang
- Family Health Services Division, Maui DHO
- Hana Health Center
- Hui No Ke Ola Pono
- Maui AIDS Foundation
- MCC Health Center
- Maui Public Health Nurse
- Mental Health Kokua
- Maui Memorial Medical Center
- Mental Health of America – Maui Branch

LAW ENFORCEMENT / LEGAL AID

Hawaii

- Hawaii County Community Police Officers
- Hawaii County Prosecutor's Office
- Hawaii County Parks and Recreation

Kauai

- Legal Aid Society
- Volunteer Legal Services Hawai'i
- Hawai'i State Judiciary – Fifth Circuit self-help center
- Limited legal information for self-represented parties for non-criminal cases from volunteer attorneys and Americorps volunteers.

Maui

- Child and Family Services
- County of Maui Parks and Recreations/Rangers
- Department of Public Safety
- Hawaii Paroling Authority
- Legal Aid Society
- Maui County Community Police Officers

EDUCATION SERVICES

Hawaii

- University of Hawaii, Hilo

Kauai

- Kaua'i Community College
- McKinley Community School for Adults

Maui

- Aloha Independent Living of Hawaii
- Kihei Library
- Maui Economic Opportunities, Inc. (MEO)
- Mental Health of America – Maui Branch
- University of Hawaii, Maui College

EMPLOYMENT SERVICES

Hawaii

- Hawaii County Research and Development
Hawaii County Economic Opportunity Council
Alu Like: Employment and Training
American Job Center – Hawaii Island

Kauai

- American Job Center-Kauai Branch.
- Alu Like: Employment & Training
- Department of Vocational Rehabilitation
- Disability Resource Center

Maui

- Goodwill Job Connections
- Maui Economic Opportunity, Inc
- Maui Job Corp
- People Ready (formerly Labor Ready)
- Vocational Rehabilitation

YOUTH SERVICES***Hawaii***

- Salvation Army Family Intervention Services

Kauai:

- Hale Opio
- ALU LIKE

Maui

- Lo'iloa
- Maui Youth and Family Services
- Maui Economic Opportunities, Inc. (MEO) Youth Program

FOOD***Hawaii***

- ICIA – Faith Based Community Action Group
- Hawaii Island Food Basket
- The Salvation Army

Kauai

- Kaua'i Independent Food Bank
- Hawai'i Food Bank, Kaua'i Branch
- The Salvation Army

Maui

- A Cup of Cold Water: Partnership of churches offering donated material goods, food, water to homeless and needy people in some of the more remote areas of Maui.
- Family Life Center
- Feed My Sheep: Food Pantry Program
- Food Pantry Program
- Hale Kau Kau (St. Theresa Church)

- Ka Hale A Ke Ola
- Maui Food Bank
- Salvation Army
- The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

VETERAN SERVICES

Hawaii

- Salvation Army Family Intervention Services
- Hilo VET Center

Kauai:

- Hale Opio
- Veteran's Affairs
- Catholic Charities Hawai'i
- Mental Health Kokua (in partnership with U.S. Vets)

Maui

- U.S. Department of Veteran Affairs
- Supportive Services for Veteran Families (SSVF) – Family Life Center
- Salvation Army

EMERGENCY SOLUTIONS GRANT - ATTACHMENT B

Outcome Measures for Outreach, Shelter, Rapid Re-housing and Housing First

Referenced in

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

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

Outcome Measures

Outcome measures for Homeless Outreach are as follows:

1. Provider is responsible for placing 20% of Participants into permanent housing and 50% into temporary housing annually.
2. Less than 15% of Participants return to Homelessness within 2 years.
3. At least 10% of Participants increase earned income during a one-year reporting period.
4. At least 15% of Participants increase non-employment cash income during a one-year reporting period.
5. At least 25% of Participants increase total income during a one-year reporting period.
6. Maintain average monthly program enrollment that is at least 90% of the contracted commitment.

Outcome measures Homeless Outreach, Legal Services are as follows:

1. 90% of all Participants who applied for ID cards within a one-year reporting period will obtain them.
2. Maintain average monthly program enrollment that is at least 90% of the contracted commitment.

Outcome measures for emergency shelters are as follows:

1. Occupancy/ bed utilization will average 80% of the point in time capacity during quarterly and one-year reporting periods.
2. 50% of the Participants will stay 90 days or less during a one year reporting period.
3. 30% of Participants, who exit during a one-year reporting period, will exit to a permanent housing location.
4. Less than 25% of Participants who exit to a permanent housing location return to Homelessness within 2 years.
5. 15% of Participants increase earned income during a one-year reporting period.
6. 15% of Participants increase non-employment cash income during a one-year reporting period.
7. 30% of Participants increase total income during a one-year reporting period.

Outcome measures for transitional shelters are as follows:

1. Occupancy/ bed utilization will average 80% of the point in time capacity during quarterly and one-year reporting periods.
2. 30% of the Participants will stay 90 days or less during a one year reporting period.
3. 60% of Participants, who exit during a one-year reporting period, will exit to a permanent housing location.

4. Less than 15% of Participants who exit to a permanent housing location return to Homelessness within 2 years.
5. 20% of Participants increase earned income during a one-year reporting period.
6. 320% of Participants increase non-employment cash income during a one-year reporting period.
7. 40% of Participants increase total income during a one-year reporting period.

Outcome measures for Rapid Re-housing are as follows:

1. 50% of all Participants are placed in a permanent housing unit within 45 days of program entry.
2. 80% of all Participants who exit during a one-year reporting period, will exit to a permanent housing location.
3. Less than 15% of all Participants return to Homelessness within 2 years.
4. 15% of residents increase earned income during a one-year reporting period.
5. 10% of all Participants increase non-employment cash income during a one-year reporting period.
6. 25% of all Adults increase total income during a one-year reporting period.
7. Maintain average monthly program enrollment that is at least 90% of the contracted commitment.

Outcome measures for Housing First are as follows:

1. 90% of all Participants are placed in a permanent housing unit within 30 days of program entry.
2. 85% of all Participants remained in or exited to other permanent housing within a one-year reporting period.
3. Less than 15% of all Participants return to Homelessness within 2 years.
4. 10% of all Adults increase earned income during a one-year reporting period.
5. 20% of all Adults increase non-employment cash income during a one-year reporting period.
6. 25% of all Adults increase total income during a one-year reporting period.
7. Maintain average monthly occupancy that is at least 90% of the program's unit capacity.

EMERGENCY SOLUTIONS GRANT - ATTACHMENT C

Standards for Providing Assistance

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

Emergency Solutions Grant Standards for Providing Assistance

ELIGIBLE PARTICIPANTS

- a. Participants of the ESG Program must meet one of the following definitions of homelessness:

Category 1 – Literally Homeless

(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2 – Imminent Risk Of Homelessness

(2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4 – Fleeing/Attempting To Flee Domestic Violence

Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing

- b. Eligibility by Component:

Emergency Shelter (ES):

Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects:

- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homeless
- Category 3 – Homeless Under Other Federal Statutes
- Category 4 – Fleeing/Attempting to Flee DV

Rapid Re-Housing (RRH):

Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)

Homelessness Prevention (HP):

Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:

- Category 2 –Imminent Risk of Homeless
- Category 3 – Homeless Under Other Federal Statutes
- Category 4 – Fleeing/Attempting to Flee DV

Individuals and Families who are defined as “At Risk of Homelessness” are eligible for assistance in HP projects.

HP projects have the following additional limitations on eligibility with homeless and at risk of homeless: must only serve individuals and families that have an annual income below 30% of AMI

c. Priority shall be given to eligible homeless families and persons in the following order:

First: Unsheltered homeless, including those staying at homeless shelters;

Second: At-risk homeless, including those staying at abuse shelters.