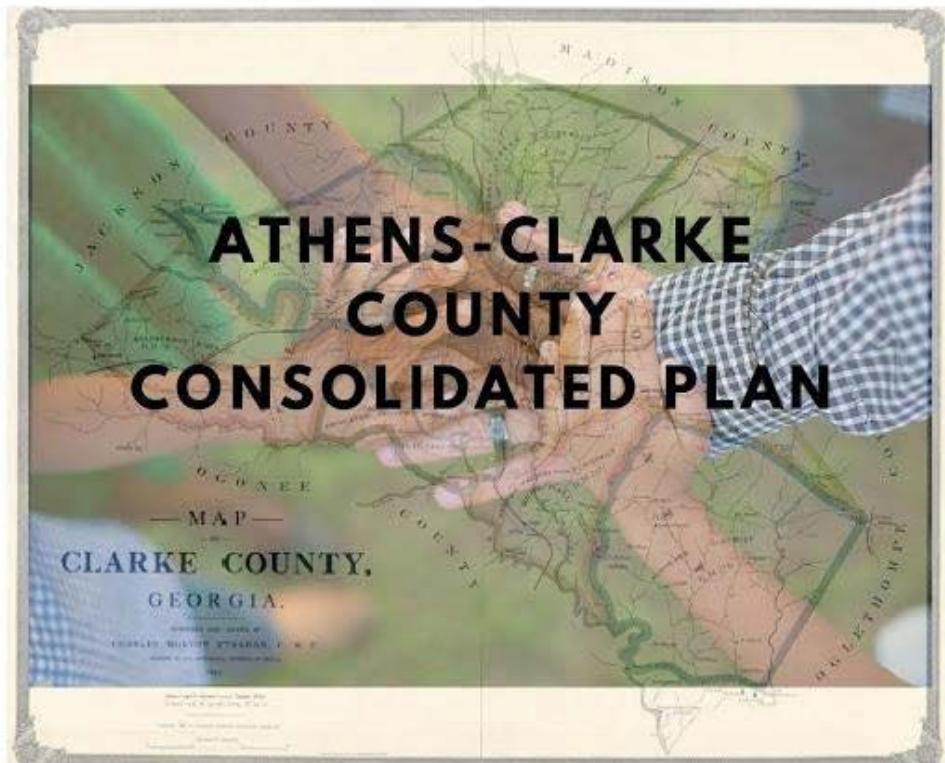


2021-2025



Annual Action Plan IV

2023

Annual Action Plan
2023

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Executive Summary

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

1. Introduction

The 2021-2025 ACC Consolidated Plan is a five-year plan that describes the Unified Government of Athens-Clarke County's (ACC) community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions, and resources available to the community. The Athens Metropolitan Statistical Area (MSA) comprises the following counties and all of the incorporated municipalities within them: Clarke, Oconee, Madison, and Oglethorpe. ACC is a consolidated government located in Northeast Georgia. The jurisdiction covers approximately 122 square miles. Athens-Clarke County is a HUD Entitlement Community and as such is required to prepare a Consolidated Plan and Annual Action Plans as a prerequisite for receiving HUD funding. The ACC Housing and Community Development Department (HCD) is responsible for administering Housing and Urban Development (HUD) funded Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs along with other federal, state, and local funds to support and assist community development efforts to sustain viable neighborhoods by providing decent housing, a suitable living environment, and expanding economic opportunities for low to moderate income residents. CDBG and HOME funded programs assist housing and community development activities. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan's strategic plan. Following is a summary of the funds available to assist Action Plan IV activities. HUD released CPD Notice 22-05 on March 25, 2022 providing guidance and extension of Annual Action Plan submission until July 2022. HCD was notified of FY23 CDBG award on June 2, 2022. The Financial Information for Annual Action Plan IV (July 1, 2023-June 30, 2024) is: \$1,220,765 CDBG, \$78,721 CDBG Funds Available for Reprogramming, and \$852,608 HOME Investment Partnership (HOME). The achievement of HCD's mission requires a focus on socially and economically distressed areas for neighborhood revitalization. Revitalization involves a comprehensive delivery of housing and community development services and investment in fragile neighborhoods to improve social and economic conditions and ultimately re-establish a viable self-sustaining neighborhood. ACC has two HUD approved neighborhood revitalization plans; one for East Athens and another for the Hancock Corridor. Each neighborhood revitalization plan area is considered to be low or moderate income with 70% or more of its residents earning low to moderate incomes. It is for these reasons that Census Tracts 301, 302, 6, and 9 have been designated as focus areas for CDBG and HOME investments. Along with the establishment of neighborhood revitalization areas, ACC works to improve the capacity of non-profit organizations to deliver programs in the revitalization areas. Athens-Clarke County's two

HUD approved Neighborhood Revitalization Plans are part of the Consolidated Plan. The East Athens and Hancock Corridor Neighborhood Revitalization Plans were approved by the Mayor and Commission in 1995 and 2000 respectively. ACC plans to continue neighborhood revitalization efforts in East Athens and the Hancock Corridor for the duration of this Consolidated Plan. These strategies allow ACC to allocate CDBG for public services, economic development and neighborhood revitalization activities, for the exclusive benefit of residents of these plan areas, which are not subject to the annual 15% public service cap.

2. Summarize the objectives and outcomes identified in the Plan

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

Government housing assistance programs, including those provided by HUD, significantly reduce housing needs and homelessness, but are not available for all those who need assistance. CDBG, HOME, and other funding opportunities will assist local partners with activities to assist business expansion programs through partnerships with non-profit corporations, private developers, small businesses, and lenders. Housing strategies include infill development, real estate acquisition, construction of single-family and multi-family housing, historic preservation, owner-occupied home repairs, accessibility improvements, and rehabilitation of single-family houses and multi-family developments to expand housing choices and increase the availability of safe, decent, affordable housing. The plan also includes strategies to improve neighborhoods such as the identification and demolition of burned-out and dilapidated structures blighting neighborhoods through court-orders and through a voluntary program designed to assist low-income owners of dilapidated and dangerous properties. The plan also includes public services benefiting seniors, youth, those in need of medical assistance, counseling, and educational and training assistance. Consolidated Plan partners will use a variety of objectives to address plan goals. Affordable Housing Development and Redevelopment is the priority goal in the strategic plan, with the goal to increase the amount of affordable housing for low to moderate income ACC residents and to provide access to services that help households access and maintain affordable housing. Objectives to address the goal include property acquisition, construction of single-family homes and multifamily developments, housing rehabilitation, and owner-occupied home repairs to remove hazards. Economic Development and Workforce Development goals are designed to promote the upward economic mobility of low- and moderate-income ACC residents' small business, worker owned cooperatives, entrepreneurship, and workforce development support through the provision of job skills training, GED preparation, business planning assistance, capital loans for small businesses, and job placement programs to reduce barriers to employment. Housing Services objectives include provision of shelter and re-housing financial assistance for the homeless, housing counseling, financial literacy, fair housing services, and demolition assistance. Special populations' objectives are to enhance quality of life for individuals with mental illness, substance use disorder, individuals with disabilities, formerly

incarcerated and seniors. Public infrastructure objectives aim to foster public infrastructure improvements that enhance the lives of low- and moderate-income residents of ACC.

Athens-Clarke County's goals for the 2021-2025 planning period are addressed through:

- Affordable Housing Development and Sustainability programs
- Microenterprise activities, Economic Development projects, and Neighborhood Revitalization Public Services beyond the 15% cap
- Public Services to assist housing counseling, youth development, senior services, homeless shelter, job training and employment
- Public Infrastructure projects
- CDBG Administration and Planning
- HOME Administration and Planning
- CHDO Set-aside
- CHDO Operating

3. Evaluation of past performance

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

According to the 2022 Year Consolidated Annual Performance and Evaluation Review, HUD's assessment has included reviews of Athens-Clarke County's consolidated planning process, management of grant funds, progress in carrying out local policies and program activities, compliance with program requirements, the accuracy of performance reports, and accomplishments in meeting Departmental objectives. HUD has determined that Athens-Clarke County's overall progress is satisfactory and the Housing and Community Development Department has the capacity to continue implementing and administering Athens-Clarke County's Consolidated Plan program activities in accordance with the applicable statutory requirements. Last fiscal year partners used CDBG funds to assist 32 homeowners repair[ML1] their homes with minor to moderate rehabilitation assistance. Athens Area Habitat for Humanity assisted 2 homeowners with handicap accessibility enhancements. In addition, Habitat completed the remaining six non-HOME rental rehab units on Magnolia Terrace. A single-family housing unit is being converted to four affordable rental units, and two homebuyer units are nearing construction completion with the support of CDBG and HOME funds. CDBG funds assisted 3 new homebuyers with downpayment homeownership assistance. CDBG funds served eighty-four extremely low-income households, ninety low-income households, and sixty-five very low-income persons. Low income of 155 includes both low income and very low persons and is the majority income group served at 58% of the CDBG low income reported. HOME funds served ten low-income persons and one extremely low-income person with new homebuyer units. CDBG assisted Microenterprise programs with entrepreneurship, vendor development classes, and business coaching for new and existing businesses in Athens through the twelve-week GoodBiz program, for vendors at the West Broad Farmers Market through an eight-week program "Grow Your Business", for at-risk youth (ages 16-24) through the ongoing Young Urban Farmer Development Program at the West Broad Market Garden and Farmers Market, and job coaching and business assistance services in East Athens. Hundreds of citizens were assisted through various public service programs that support accessing housing and expanded economic opportunities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

ACC relies on existing planning and needs identification at the community, departmental, and other stakeholder level to inform the ConPlan Goals & Objectives. The planning approach utilized to develop the ConPlan included a thorough review of indicators, both economic & demographic, a review of housing supply & need, and reviews of community needs by geographic area & subpopulations. Focus group meetings were held to identify resources and citizen concerns regarding housing & community development needs. The focus groups were: East Athens Neighborhood Revitalization Area, Latinx Community, Vision Advisory Committee, Hancock Corridor Neighborhood Revitalization Area, Homeless Population, and Elderly and Disabled Individuals. The focus groups were made up of community leaders, non-profit organizations, residents, and program consumers, totaling 80 participants. HCD also held a series of seminars for the public on Fair Housing, Economic Development, Affordable Housing, and Information/Input on ConPlan 5 Year Goals and Objectives. HCD sorted participant comments & concerns into 4 topics: social services, business & employment services, housing related services, community improvements, identified ConPlan goals and examples of CDBG eligible objectives from information gathered. HCD staff met with the citizen advisory committee AKA the Vision Committee (VC), to identify ConPlan goals and to get their views on community needs. The VC is a 10-member committee appointed by Mayor and Commission to assist HCD in recommending Action Plan activities. HCD actively participated in the following initiatives to obtain public input and produce reports and/or recommendations used in developing the ConPlan: A year-long community planning & assessment process that developed community goals and strategies for future land use, housing, economic development, education, social services, and infrastructure. Partners included ACC Planning & Economic Development Departments, UGA, Clarke County School District and local corporations; the Envision Athens process; Athens Wellbeing Project (Partners in this process were: ACC Police, Athens Area Community Foundation, Athens Housing Authority, ACCGov, United Way, Piedmont Athens Regional Health System, Family Connection Communities in Schools, and Envision Athens); ACC Comprehensive Plan (developed in partnership with Envision Athens' community wide process); Network for Southern Economic Mobility(includes representatives from the Clarke County School District, ACC Departments of HCD, Economic Development, UGA, CarrierTransicold, Chess & Community, and HW Creative Marketing); GICH (made up of representatives from ACCGov, AHA, ALT, AAHFH, local realtors, ABHS, AAHS, and UGA). During a M&C Work Session regarding the ConPlan, HCD staff presented proposed FY22 CDBG-CV & FY22 CDBG activities. On 09/04/2019, the Mayor and Commission approved the FY21-FY25 ConPlan goals and objectives.

On October 20, 2022, HCD released the FY24 CDBG funding application, receiving 23 CDBG applications seeking \$2,570,775. On January 23, 2023, HCD met with the VC to review and rate each CDBG application respectively. On March 14, 2023, HCD staff presented recommendations for CDBG funding to the Mayor and Commission for the FY24 Annual Action Plan IV. The March 21, 2023 agenda setting meeting, and the voting meeting on April 4, 2023 included a public hearing seeking citizen comment

about AAP IV recommendations. The ConPlan and AAP were available for review and comment for 30-days. According to the Citizen Participation Plan, copies were available at: accgov.com/hcd, East Athens Development Corporation, and the ACC Housing and Community Development Department.

5. Summary of public comments

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

The Department received (number of comments here) during the review period of the Consolidated Plan. Annual Action Plan IV public comment period ended May 10, 2023.

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

Not applicable for the 21-25 Consolidated Plan, as no comments were received. Annual Action Plan IV public comment period ended May 10, 2023.

7. Summary

The Athens-Clarke County 2021-2025 Consolidated Plan is designed to develop a viable urban community by providing decent housing, a suitable living environment, expanded economic opportunities principally for low and moderate-income persons, and programs that address the needs of homeless and near homeless persons. An approved Citizen Participation Plan was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public, a housing market and demographic analysis, and data provided by HUD was used to identify goals and the activities in this Consolidated Plan. The planning approach included a thorough review of community indicators and a series of focus group meetings to identify community resources and neighborhood needs. Findings from the community meetings were presented to the Athens-Clarke County Mayor and Commission which formally approved the Consolidated Plan Goals and strategies.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Athens	Housing and Community Development Department
HOME Administrator	Athens	Housing and Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The Athens-Clarke County Department of Housing and Community Development (HCD) is responsible for administering the Housing and Urban Development (HUD) funded Community Development Block Grant and HOME programs. HCD is the lead agency responsible for planning and implementing the Consolidated Plan.

Consolidated Plan Public Contact Information

The ACC Housing and Community Development Department is located at 375 Satula Avenue, Athens GA 30601 and the HCD website is <https://accgov.com/hcd>. Physical copies of the FY2021-FY2025 Consolidated Plan may be requested Monday through Friday, 8:00am to 5:00pm, by phone at 706-613-3155 or email at andrea.livingston@accgov.com. Physical copies can be picked up or HCD staff will mail them to requesters. Downloaded copies may be obtained through the HCD website at <https://accgov.com/DocumentCenter/View/77608/ACC-ConPlan-FY21-FY25>.

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

1. Introduction

During the preparation of the Consolidated Plan, HCD solicited input from governmental agencies as well as various public and private agencies providing housing, public services, and economic development.

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

Athens-Clarke County completed the three-year program of technical assistance and cross-community sharing with community housing teams to improve the quality of life and economic vitality through the development of locally-driven housing and revitalization strategies. The ACC Georgia Initiative for Community Housing (GICH) alumni team/committee will continue to meet quarterly to plan and discuss housing issues, activities and solutions. GICH will actively work to identify and prioritize objectives to create affordable (and/or workforce) rental housing, research voluntary inclusionary zoning and seek funding options for the housing trust fund. On February 12, 2019, the Athens GICH Team presented a proposal to improve Housing Affordability in Athens, Georgia to the Mayor and Commissioners. The GICH team prepared an Affordable Housing proposal for the 2020 special purpose local option sales tax (SPLOST) campaign that would set the table to redevelop for a multi-site mixed-income development in the county. On November 5, 2019, ACC residents voted and passed the SPLOST 2020 programs which included \$44.5 million for a designated Affordable Housing project. Through its various iterations, the committee is composed of representatives from the Athens Housing Authority, (the host of the meetings), Athens Land Trust (the local Community Housing Development Organization), Athens Area Habitat for Humanity, all are non-profit organizations focusing on housing development, or maintenance and sustainability of affordable housing. Representatives from Athens Area Homeless Shelter, the local government, and academics from the University of Georgia also participate in meetings to share ideas and discuss collaborative projects. The purpose of the committee is to improve inter-agency collaboration and planning for the development of affordable housing. Athens-Clarke County is a consolidated city/county government. In March 2022, Mayor and Commission designated the Georgia Initiative for Community Housing (GICH) Committee as the advisory group to make recommendations on how to increase and expand housing affordability options. In coordination with ACCGov staff and a consultant, GICH would also assist in the development and prioritization of affordable housing goals and strategies with \$11 million allocated from the American Rescue Plan Act (ARPA). Other initiatives include the county coordinating with the State of Georgia Department of Community Affairs (DCA) through non-profit partners in the Continuum of Care that receive CDBG and Homeless Assistance grants through Athens-Clarke County and DCA. The Mayor and Commission also designated the Athens-Clarke County Homeless Coalition: Continuum of Care as its advisory group to make recommendations on how to increase and expand homeless housing and services options. In a coordinated effort with

ACCGov staff and a consultant, the Athens Homeless Coalition will also assist in the development and prioritization of homeless goals and strategies. They allocated \$5M from American Rescue Plan Act (ARPA) funds to begin this action. The Mayor and Commission (M&C) have designated the GICH Committee as the advisory group to make recommendations on how to increase and expand housing affordability options. The Mayor and Commission have allocated \$11 million ARPA to efforts related to this process. In coordination with ACCGov staff and consultant, a Housing Affordability Investment Strategy will be developed.

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.

As the Collaborative Applicant, Athens-Clarke County coordinates closely with Continuum of Care members to address the needs of individuals and families who are homeless, at-risk of homelessness, and individuals who recently obtained housing after experiencing homelessness in ACC. HCD provides support to the CoC and participates in monthly meetings to facilitate interagency collaboration and planning for CoC services. The CoC works closely with the school district, family service providers, and veterans' affairs case manager to quickly identify these populations. In developing this Consolidated Plan and Annual Action Plan, HCD held a focus group with CoC providers to identify needs related to homelessness and potential strategies to address those needs. Representatives from the Salvation Army, Athens Area Homeless Shelter, Live Forward, Advantage Behavioral Health Systems, Athens-Clarke County Library, The Ark, and the Department of Veterans Affairs were some of the partners present. The meeting was open to the public; local religious organizations and individuals not affiliated with an organization were in attendance. Collaboration with these and other local, regional, and national agencies ensures that housing and services reflect local needs and are offered in a manner that best serves people who are homeless or at risk of homelessness. ACC has a successful, long-standing history of collaborative planning and coordination to reduce and end homelessness.

From a regional perspective, Athens-Clarke County collaborates with the Georgia Department of Community Affairs to facilitate service coordination, client referrals and the collection of data through a shared Homeless Management Information System (HMIS). In addition, Athens-Clarke County participates in the state's HMIS Steering Committee. The purpose of the GA HMIS Steering Committee is to collaboratively manage the implementation and administration of the shared HMIS in accordance with the requirements established by the U.S. Department of Housing and Urban Development (HUD), its federal partners, and the shared priorities of the GA HMIS Collaborative. Additionally, the Steering Committee strives to identify ways to help provider agencies record, report, and improve their services through the shared HMIS by serving as a conduit between CoC's and the HMIS Lead. The coalition is a non-profit organization that coordinates agencies providing services and assistance for the homeless population and conducts the annual point in time count to help area shelters and soup kitchens determine the needs of the homeless population in Athens. The Coalition's Executive Committee includes representation from Athens Area Homeless Shelter, Advantage Behavioral Health Systems, and HCD. This body has been significant in the planning and coordination of homeless services in ACC. The

Homeless Coalition Committees reflect the changing needs in the community; sub-committees and ad-hoc committees are added as needed. The committees include (1) Housing Solutions (2) Landlord Engagement and Retention (3) HMIS Performance (4) Communications (5) Encampment Engagement and Planning, and (6) Homelessness - Domestic Violence and Sexual Assault. These committees are the foundation of community efforts to implement the Athens Homeless Coalitions 2022 - 2024 Strategic Plan. In addition to this plan, ACCGOV approved funds for a consultant to create a comprehensive plan to end/address homelessness in Athens.

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

HCD, in collaboration with the CoC and Governing Board, establishes priorities for ESG funding which correspond to the needs of the county. All agencies receiving ESG funding are required to adhere to CoC Coordinated Entry policies and procedures and follow federal guidelines in the implementation of the ESG program. ESG and CoC recipients must assure compliance with all HUD record keeping provisions, including use of the HMIS (with the exception of Victim Service Providers). The continuum uses HMIS data to evaluate agency performance and housing destination outcomes. The ACC Homeless Coalition Executive Committee meets routinely to handle the organizational aspects of the Coalition and is responsible for developing and updating policies and procedures. The Coalition, with assistance from HCD, has continued to recruit active community members and organizations into the planning process. Members of this collaborative planning body attend monthly meetings and participate in the CoC planning sessions. The County also participates in state efforts and meetings related to HMIS. The HMIS steering committee collaboratively manages the implementation and administration of the shared HMIS in accordance with the requirements established by HUD, its federal partners, and the shared priorities of the GA HMIS Collaborative. The HMIS Data Standards are adopted by the HMIS Steering Committee. The CoC Governance Board approved the Georgia DCA to serve as the HMIS lead.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Advantage Behavioral Health Systems
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Employment Other government - State Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Advantage provided information about homeless and mental health care services and housing for the Con Plan. Anticipated outcomes include better collaboration and alignment with shared goals.

2	Agency/Group/Organization Agency/Group/Organization Type	Live Forward Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	LiveForward provided information about HOPWA and HIV/AIDS services and housing for the Con Plan. The Homeless Coalition has facilitated one-on-one discussions with LiveForward to better assist the project goals. The anticipated outcomes include better collaboration, planning, and alignment with shared goals.

	Agency/Group/Organization	ATHENS HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Other government - Federal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	AHA provided information about Affordable Housing and PHA services and housing for the Con Plan. Anticipated outcomes include better collaboration and alignment with shared goals.

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

Participation in planning and assessment meetings for Athens-Clarke County is publicly announced and all meetings and processes are open to the public. HCD makes every effort to include all agencies and stakeholders in processes and meetings. Agencies not participating in local planning and consultation processes did not have the staffing available or capacity to participate because of serving clients and delivering services.

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	Athens-Clarke County Homeless Coalition	The plan supports the national objectives to end chronic homelessness and reduce the number of homeless individuals through prevention, shelter, and rapid rehousing programs.
Envision Athens	ACC Planning Dept., ACCGov, ACC HCD, CCSD, Private businesses, nonprofits, ACC elected officials	A multiyear initiative and process involving all ACC residents to develop a community and economic development strategic plan to lead ACC forward in the next 10 years. Envision Athens supports the Con Plan goal of a viable community with diverse housing options, economic opportunity and services.
Athens Wellbeing Project	UGA, CCSD, ACCGov	This project gathered data from the community regarding development of a viable community with economic opportunity, diverse housing options, and quality of life. Data was collected in each school district to inform future educational and programmatic initiatives. AWP provided essential support and date for the ConPlan goal of education and enrichment support and improvement of quality of life for special populations.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Georgia Initiative for Community Housing (GICH)	DCA, ACC HCD, ALT, AHA, AA Habitat for Humanity, ABHS, AAHS, local realtors	DCA's multi-year initiative with local governments to assist them in developing housing strategies. The GICH report informs and supports the Con Plan goal to increase the amount of affordable housing and assist individuals with accessing housing. The ACC GICH Committee adopted measures to increase affordable housing: create an affordable housing special revenue fund; incentivize inclusionary development, solidify code enforcement practices, and combat displacement of existing neighborhood groups.
Network for Southern Economic Mobility (NSEM)	ACC HCD, CCSD, nonprofit agencies serving youth	A local and regional initiative focused on creating a pathway to successful education and a meaningful career path for Athenæus youth. This resulted in a strategic plan adopted by the ACC elected officials to support NSEM's priority actions to improve the education and overall quality of life for Athenæus youth.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
ACCGov Comprehensive Plan	ACC Planning Dept., ACCGov, ACC residents and neighborhood groups, Envision Athens Steering Comm.	The Georgia Department of Community Affairs requires local governments to develop a plan every 10 years to plan for and prepare for housing, economic development and quality of life. Specific policies are included in the plan to guide the ACC government in planning and zoning, development, land use, economic development and quality of life issues. This process was guided by the Envision Athens input and collaboration initiative, resulting in a plan to govern people, place, prosperity, and quality of life.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

HCD uses a variety of methods to involve citizens in the decision-making process for the Consolidated Plan. The purpose is to encourage citizen participation, with particular emphasis on participation by persons of low and moderate income and residents of slum and blighted areas and areas in which community development funds are proposed to be used. All aspects of citizen participation are conducted in an open manner and every reasonable effort is made to include low- and moderate-income people, residents of neighborhood revitalization target areas, minorities, Latinx, and those with limited English Proficiency, the elderly, handicapped, project area residents, civic groups and nonprofit organizations who serve low-income people. Notices of all public hearings are published as a block ad in the nonlegal section of the newspaper of general circulation (in this case, the Athens Banner-Herald) at least 14 days prior to the time of any public hearing. Public hearings are also advertised on the ACCGOV website, email, the HCD Facebook page, and other social media. The Athens-Clarke County Consolidated Plan Citizen Participation Plan can be found at the end of this document. Approximately eighty people participated in the focus group meetings. Community input meetings were also held as part of HCD's annual Lunch & Learn series. All meeting participant comments and concerns were documented. Almost 200 people participated in the Athens Wellbeing Project and Envision Athens community input meetings. Draft goals and strategies were then developed from the information gathered. Information from the community needs and resource assessment meetings and a proposed Annual Action Plan schedule was presented to the Mayor and Commission for formal approval at an advertised meeting on October 13, 2019.

For Annual Action Plan IV, the Mayor and Commission March 21, 2023 agenda setting meeting and voting meeting on April 4, 2023 provided a public hearing seeking citizen comment about the Annual Action Plan IV recommendations. The Consolidated Plan and Annual Action Plan were available for review and comment for 30-days. According to the Citizen Participation Plan, copies were available at: accgov.com/hcd, East Athens Development Corporation, and the ACC Housing and Community Development Department. Hard copies were available upon request.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Residents of Public and Assisted Housing East Athens residents and service providers	30 people participated in this focus group. HCD sorted participant comments on priority needs: Social Services: improved access to social services, more youth & children services; Small & Microbusiness Assistance: Job training for youth, more grocery stores & access to healthy food, link job training & entrepreneurship; employment for ex-offenders; Affordable Housing: emergency home repair; affordable rental housing, discourage housing displacement	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		

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)
			Public Infrastructure: more sidewalks & lighting; neighborhood cleanup & beautification. Other priorities: more & better police presence.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Residents of Public and Assisted Housing Minorities	15 people participated in this focus group, including housing partners and the HCDC Executive Director. Social Services: youth activities & employment to prepare for the workplace, job skills training, health services; Public Infrastructure: street lighting, crosswalks, traffic calming & pedestrian safety; Small & Microbusiness: Credit counseling, startup loans, small business counseling; Affordable Housing: more emergency home repair, fix code violations, increase	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		

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)
3	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish	25 people participated in this focus group, including Latinx advocacy group representatives and stakeholders. Social Services: Spanish GED, financial literacy, more interpreters in law enforcement, more service providers for Latinx community; more publicity for Latinx services; Small & Microbusiness: more access to small & microbusiness in ACC; need more outreach to Latinx by Goodwill; more translation. Affordable Housing: more outreach to Latinx by affordable housing	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Citizen Participation Committee (Vision Committee)	5-6 participants, which is approximately half of the committee. Social Services: more mental health services, more services for the homeless, improved transportation, early childhood education, more Head Start. Small & Microbusiness: small business loans for startup daycare centers; stipends for youth job training, support for youth internships, workforce partnership with Athens Tech. Affordable Housing & Shelter: reform of zoning for multifamily housing;	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		

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)
5	Public Meeting	Minorities Persons with disabilities Elderly/Seniors	Approximately 30 people attended this focus group meeting.	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		
6	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities	HCD annually holds Lunch and Learn sessions available to all ACC residents. These sessions featured guest speakers from Athens nonprofits and included open discussions.	All comments were accepted during the focus group & public input meetings. No comments were received during the 30-day review period.		

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)
7	Public Meeting	Non-targeted/broad community	Interested Local Residents	All comments were accepted during the focus group & public input meetings. No comments were received during the 30 day review period.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,220,765	0	34,388	1,255,153	1,255,153	Public Services: \$183,000; Neighborhood Revitalization and Economic Development: \$294,000; Affordable Housing Development: \$534,000; Public Facilities and Improvements: \$0; CDBG Administration and Planning: \$244,153; Reprogrammable CDBG Funds: \$34,388

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	852,608	0	0	852,608	852,608	Affordable Housing: \$596,827 Administration and Planning: \$85,260 CHDO Set-aside: \$127,891 CHDO Operating: \$42,630
Other	public - federal	Other	0	0	0	0	0	

Table 1 - Expected Resources – Priority Table

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

Matching requirements are met by Public Service subrecipients awarded CDBG funds. General funds will assist the Housing and Community Development Department plan and administer the housing and community development department.

The HOME allocation for the fiscal year is \$852,608. The 25% match requirement will be fulfilled through eligible sources of match for HOME funds for future HOME-eligible projects. The matching contribution adds to the resources available and come in the form of a permanent

contribution to affordable housing.

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

At this time, there is no publicly owned property in Athens-Clarke County that can potentially be used to address needs identified in the plan.

Discussion

General funds, match for public services, and HOME matching funds will assist in delivering services identified in the Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development and Redevelopment	2020	2024	Affordable Housing	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan	Affordable Housing	CDBG: \$534,000 HOME: \$767,347	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Economic Development & Workforce Development	2020	2024	Non-Housing Community Development	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan	Non-housing Community Development	CDBG: \$294,000	
3	Education and Enrichment	2020	2024	Non-Housing Community Development	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan	Non-housing Community Development	CDBG: \$30,000	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Services	2020	2024	Homeless	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan	Homelessness	CDBG: \$93,000	
5	Special Populations	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan		CDBG: \$30,000	
6	Public Infrastructure	2020	2024	Non-Housing Community Development			CDBG: \$1	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	HCD Administration and Planning	2020	2024	Administration and Planning	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan	Affordable Housing Homelessness Non-housing Community Development	CDBG: \$260,618 HOME: \$85,893	Other: 1 Other

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development and Redevelopment
	Goal Description	To increase the amount of affordable housing for low and moderate income Athens-Clarke County residents and to provide access to services that help households access and maintain affordable housing.

	Goal Name	Economic Development & Workforce Development
	Goal Description	To promote the upward economic mobility of low and moderate income Athens-Clarke County residents through, small business, worker-owned cooperative, entrepreneurship, and workforce development support.
3	Goal Name	Education and Enrichment
	Goal Description	To support the educational development and growth of children in Athens- Clarke County through educational, enrichment, and supportive services.
4	Goal Name	Homeless Services
	Goal Description	To prevent and end homelessness through emergency shelter, permanent housing, prevention, street outreach, and other homeless services.

	Goal Name	Special Populations
	Goal Description	To enhance quality of life for: individuals with mental illness, individuals with a substance use disorder, individuals with disabilities, individuals who are formerly incarcerated, and seniors.
6	Goal Name	Public Infrastructure
	Goal Description	To foster public infrastructure improvements that improve the lives of low and moderate income residents in Athens-Clarke County.
7	Goal Name	HCD Administration and Planning
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

The Strategic Plan outlines Six priority goals identified during the community resources and needs assessment planning process and the strategies for addressing these goals. The following is a summary of the goals:

Affordable Housing Development and Redevelopment, Economic Development and Workforce Development, Education and Enrichment, Homeless Services, Special Populations, Public Infrastructure.

CDBG will assist: Affordable Housing development, repair, and rehabilitation, demolition, Neighborhood Revitalization and economic development projects, public services, public facilities and CDBG administration and planning activities. HOME will assist: HOME administration and planning, HOME affordable housing activities, CHDO set-aside and CHDO operating activities.

Projects

#	Project Name
1	Affordable Housing Development and Redevelopment
2	Economic Development and Workforce
3	Education and Enrichment
4	Homeless Services
5	Special Populations
6	Public Infrastructure
7	HCD Administration and Planning

Table 3 - Project Information

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

All approved applications meet priority goals and objectives designated in the 2021-2025 Consolidated Plan, and are related to Affordable Housing, Economic Development, Education and Enrichment, Homeless Services, Special Populations, and Public Infrastructure. Awarded agencies have demonstrated the ability to provide community services and meet community needs through former performance success. A primary obstacle to addressing underserved needs is the lack of funding to meet the overall demand, especially for affordable housing and public service concerns. Community need is high, but the

funding is not adequate to respond and meet/overcome the demand. American Rescue Plan Act (ARPA) funding has been allocated to the following activities: Affordable Housing (11 million), Homelessness (\$5 million), and Youth Enrichment & Violence Prevention (\$7 million). An Affordable Housing Strategic Plan and Homeless Strategic Plan are in process and will assist in the allocation of ARPA funds. The HOME-ARP award totaling \$2,506,309 will be dedicated to homelessness activities once the HOME-ARP plan is completed, submitted to, and approved by, HUD.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing Development and Redevelopment
	Target Area	East Athens Neighborhood Revitalization Plan Hancock Corridor Neighborhood Revitalization Plan
	Goals Supported	Affordable Housing Development and Redevelopment
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$534,000 HOME: \$767,347
	Description	To increase the amount of affordable housing for low and moderate income Athens-Clarke County residents and to provide access to services that help households access and maintain affordable housing. Funding sources are CDBG and HOME funds. HOME funded activities include Affordable Housing development and redevelopment activities: \$127,891 CHDO Set-aside, \$42,630 CHDO Operating
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added: 9 Household Housing Unit Homeowner Housing Rehabilitated: 38 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted Buildings Demolished: 4 Buildings
	Location Description	Scattered sites throughout Athens-Clarke County.

	Planned Activities	Homeowner occupied rehabilitation; acquisition, disposition, and demolition for future development of affordable housing units; support of HOME-funded activities for the development of affordable housing units
2	Project Name	Economic Development and Workforce
	Target Area	East Athens Neighborhood Revitalization Plan
	Goals Supported	Economic Development & Workforce Development
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$294,000
	Description	To promote the upward economic mobility of low and moderate income Athens-Clarke County residents through, small business, worker-owned cooperative, entrepreneurship, and workforce development support.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 260 Persons Assisted Jobs created/retained: 55 Jobs Businesses assisted: 105 Businesses Assisted
	Location Description	Scattered sites throughout Athens-Clarke County.

	Planned Activities	Microenterprise activities and CDBO public service activities carried out as economic development projects.
3	Project Name	Education and Enrichment
	Target Area	East Athens Neighborhood Revitalization Plan
	Goals Supported	Education and Enrichment
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$30,000
	Description	To support the educational development and growth of children in Athens- Clarke County through educational, enrichment, and supportive services.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Chess and Community anticipates 60 students to participate and enroll in programming activities.
	Location Description	Scattered sites throughout Athens-Clarke County.
	Planned Activities	STEM-related services targeted to youth
4	Project Name	Homeless Services
	Target Area	
	Goals Supported	Homeless Services
	Needs Addressed	Homelessness
	Funding	CDBG: \$93,000

	Description	To prevent and end homelessness through emergency shelter, permanent housing, prevention, street outreach, and other homeless services.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 440 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 47 Households Assisted
	Location Description	Scattered sites throughout Athens-Clarke County.
	Planned Activities	Case management, financial assistance for housing placement (childcare payments, deposit and rental payment assistance), and direct assistance to include showers, hygiene kits, work clothes and identification.
5	Project Name	Special Populations
	Target Area	
	Goals Supported	Special Populations
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$30,000
	Description	To enhance quality of life for: individuals with mental illness, individuals with a substance use disorder, individuals with disabilities, individuals who are formerly incarcerated, and seniors.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 50 individuals assisted
	Location Description	Scattered sites throughout Athens-Clarke County.
	Planned Activities	Workforce development training, including soft skills training and case management support.
6	Project Name	Public Infrastructure
	Target Area	
	Goals Supported	
	Needs Addressed	Homelessness Non-housing Community Development
	Funding	:
	Description	To foster public infrastructure improvements that improve the lives of low and moderate income residents in Athens-Clarke County.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Future projects will serve hundreds of Athens-Clarke County residents currently experiencing homelessness and food insecurities.
7	Location Description	Scattered sites throughout Athens-Clarke County.
	Planned Activities	Public facilities and improvements eligible activities.
	Project Name	HCD Administration and Planning
	Target Area	

Goals Supported	HCD Administration and Planning
Needs Addressed	
Funding	CDBG: \$244,152 HOME: \$85,893
Description	To support CDBG administration and planning activities.
Target Date	6/30/2024
Estimate the number and type of families that will benefit from the proposed activities	2 Other
Location Description	Athens-Clarke County
Planned Activities	Planning and Administration of CDBG activities carried out by subrecipient agencies.

AP-50 Geographic Distribution – 91.220(f)

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

According to federal regulations, 70% of CDBG funds must benefit residents with low to moderate incomes (less than 80% of the median income for the county). Eighty percent of CDBG funding will assist low to moderate income census tracts in Athens-Clarke County. The remaining twenty percent will be used for administration and planning. Ninety percent of HOME funds will assist low to moderate income census tracts in Athens-Clarke County. The remaining ten percent will be used for administration and planning. ACC has focused on 2 areas for revitalization: East Athens and the Hancock Corridor. East Athens is identified as Census Tracts 301 and 302. Census Tracts 301 and 302 have 9,029 residents. 78% of the residents were considered to be of low or moderate incomes and over 60% are reported as minorities. Census Tracts 6 and 9, the Hancock Corridor, have 5,887 residents and approximately 58% are reported as minority. When the percentage is averaged between the two census tracts over 86% of the residents of Census Tracts 6 and 9 have low to moderate incomes. These Census Tracts have large public housing complexes and significant concentrations of low-income residents. Many of the homes are older and a large percentage of the residents are renters. Each Census Tract is considered to be low or moderate income since 70% or more of its residents earn low to moderate incomes. It is for these reasons that Census Tracts 301, 302, 6, and 9 have been designated as focus areas for CDBG and HOME investments.

Geographic Distribution

Target Area	Percentage of Funds
East Athens Neighborhood Revitalization Plan	25
Hancock Corridor Neighborhood Revitalization Plan	25

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Investments are allocated based on project needs, on high priorities in this plan, and in fragile neighborhoods with a disproportionate concentration of low-income and minority populations. Projects in neighborhood revitalization are given priority over projects in other areas of the jurisdiction.

Discussion

Neighborhood Revitalization and Public Services funds were allocated by analyzing local housing and community development information, utilizing Census Data, Comprehensive Housing Affordability Strategy Housing Problem data, input provided by citizens and the Vision Committee, through the

planning process, and community organizations through the application for funding.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	45
Non-Homeless	360
Special-Needs	50
Total	455

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	6
Rehab of Existing Units	3
Acquisition of Existing Units	2
Total	17

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

During the planning process, unaffordable rental and single-family homebuyer units was a constant theme. The greatest needs are: renters with very low incomes and low-income families. As a result, affordable housing program activities include affordable housing construction, acquisition, rehabilitation, homeowner repairs, in-fill housing, emergency shelter, permanent supportive housing, first-time home buying opportunities, fair housing guidance, and housing counseling support. In addition to Community Development Block Grant (CDBG) and HOME funding, HUD offers opportunities for communities to compete nationally for Homeless Assistance Grant Program funding to alleviate homelessness. As part of the Homeless Assistance Grant Application, HUD requires communities to develop or have already developed a Continuum of Care Plan, which outlines the activities, and services a community offers to assist homeless individuals move from homelessness to self-reliance. Annually, the Athens-Clarke County Continuum of Care updates its plan through a public process coordinated by the Homeless Coalition and HCD. The Homeless Assistance Grant funds the development of supportive services and housing that help homeless persons transition from homelessness to independent living through permanent supportive housing. The Homeless Assistance Grant also provides funding for rental assistance, which gives applicants flexibility in obtaining appropriate housing. HCD administers these grants and service areas include case management, rapid rehousing, and permanent supportive housing.

assistance for homeless individuals and families.

AP-60 Public Housing – 91.220(h)

Introduction

The Athens Housing Authority (AHA) continually refines all areas of its operation to promote the best possible service to its customers. The Authority utilizes a combination of Capital Fund Program (CFP) and Operating Budget funds to achieve these positive outcomes. AHA provides 1291 dwelling units within its public housing portfolio with the recent addition of 30 units in Comer Georgia. The Athens Housing Authority meets the needs of individuals and families searching for affordable rental options. However, it is important to note that the AHA is unable to provide immediate, emergency assistance housing. In addition, although many housing authorities manage the Section 8 Housing Choice Voucher Program in their communities, the Athens Housing Authority does not. The Section 8 Housing Choice Voucher Program is administered by the Georgia Department of Community Affairs for the Athens area. The demand and need for affordable rental housing far outweigh the availability. Relating to 504 accessible units, of the 1,725 families on the waiting list of the Athens Housing Authority, approximately 7% have indicated their need for a 504 handicapped unit on their pre-application and 3.5% are requesting accessible features for the hearing and visually impaired.

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

Homeownership Initiative: The Athens Housing Authority continues a comprehensive approach to promote affordable homeownership in Athens-Clarke County through various partnerships with Athens-Clarke County government, local lenders, and private organizations. Athens-Clarke County assists the Authority with funding through the CDBG and HOME programs. With these funds, the AHA buys vacant properties, some with dilapidated structures, and builds homes for sale to first time homebuyers. Athens-Clarke County continues to provide financial resources to the housing authority to help manage and support their homeownership initiative. AHA programming focuses on jobs, economic development, financial management, and homeownership readiness skills to prepare a larger portion of its resident population for participation in these programs. Action Plan IV allocates \$75,000 to the Athens Housing Authority to assist with acquisition of 1 lot and demolition of 1 dilapidated structure to clear spot slum and blight and allow for future redevelopment of affordable single-family homes. AHA was awarded HOME funds to build two new ACT I Program homes this year. Construction began in July 2021 with both homes completed and sold to first time homeowners in March 2022. **Public Housing Units:** The Athens Housing Authority will continue to modernize and improve its housing stock through the Capital Funding Program. A variety of roofing, siding, HVAC and plumbing projects are projected at a cost of nearly \$1.8 million per year.

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

Athens Housing Authority residents remain actively involved in the management of their public housing.

Several years ago, the Inter-Community Council consisted of representatives of all AHA neighborhoods incorporated as a separate 501c3 organization. The AHA provides office space for this organization. The ICC provides a number of resident services and opportunities including scholarships and resident computer access and works closely with AHA staff. A Resident Advisory Board appointed by the ICC assists in the development of the Athens Housing Authority Five-Year and Annual Plans. Finally, a resident serves as a member of the AHA Board of Commissioners.

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

The Athens Housing Authority is recognized by HUD as a "Standard Performer" under the Public Housing Assessment System. Therefore, no major plans are necessary to improve the management and operation of public housing.

Discussion

Actions planned to improve the quality of affordable housing in Athens: The Athens Housing Authority is looking to leverage the success of Columbia Brookside, a 370 unit mixed-income community built on the site of the former Jack R Wells Homes. AHA purchased the Bethel Midtown Village Apartments in December 2021 with SPLOST 2020 funds provided by ACCGOV. Working with a Partnership consisting of Columbia Residential and the Jonathon Rose Company, both proven affordable multi-family development partners, AHA developed a master plan for the transformation of the North Downtown Athens area (bound by Dougherty St, Hull St, Hoyt St and College Ave). ACCUG SPLOST 2020 funding is also being used for the necessary infrastructure improvements to support an increase in affordable housing and a total transformation of this property and surrounding area. As of May 2020, the Partnership has relocated over 70 families, demolished 6 buildings, and completed the mass grading for the first phase of this transformational project. It is anticipated that construction of the Phase I buildings (120 mixed-income dwelling units) will begin in November 2022 with anticipated completion in fall 2024.

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

Introduction

The ACC Housing and Community Development Department (HCD) is working with Continuum of Care service providers and other nonprofits to provide homelessness prevention and rapid-rehousing services and funds. Advantage Behavioral Health Systems (ABHS), Athens Area Homeless Shelter (AAHS), Live Forward, and Project Safe's domestic violence shelter are providing rapid rehousing and prevention using ESG funds and CDBG funds to provide financial assistance and follow-up case management to homeless individuals and families moving into permanent housing.

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

In the upcoming year, the Continuum's goal of establishing an ACC Landlord Partnership Program, will continue with support from the local government. The Homeless Coalition is currently researching the best evidence-based practices which have been successful in other communities. Although still in the developmental stage, these efforts will significantly decrease homelessness in ACC over the next five years. PIT count and extensive community-level data has highlighted the barriers to renting in ACC. Many landlords work solely with the college-students in the community. In addition, homeless individuals are typically not permitted to rent due to criminal history, poor credit or evictions, and lack of consistent employment. This immediately puts individuals in an unstable housing situation with an inability to rent or own housing. The hopes of the ACC Landlord Partnership Program is to build personal relationships with landlords, incentives for housing at-risk and formerly homeless individuals, educate the community, and mitigate the perceived risk of renting to vulnerable populations. A government sanctioned encampment has been opened to swiftly provide shelter to individuals experiencing homelessness. This year Athens-Clarke County will finalize the development of a strategic plan to reduce and prevent homelessness this year. This effort includes focused outreach with homeless populations with lived experience to ensure accurate and useful information to inform the plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

There are 142 emergency shelter beds available in Athens year-round. Bigger Vision, previously a winter shelter, is now open year-round providing an additional 35 emergency shelter beds. Athens Area Homeless Shelter transitioned 28 emergency shelter beds into transitional housing which is now considered permanent supportive housing. The Athens-Clarke County Mayor & Commission approved funding to support a sanctioned homeless encampment that provides low barrier, secure shelter for up to 55 individuals. The encampment is open and fully operational.

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 number of rapid rehousing vouchers available for single adults and families has increased each year for the last two years to assist homeless individuals and families from exiting shelters to transition to permanent housing and to prevent people who are at risk of homelessness from becoming homeless. In addition, the VA has provided additional VASH vouchers to assist homeless veteran families. As a result, Athens agencies have been able to shorten the period of time that people are homeless and lessen the number of people who become homeless. Continuum of Care providers intend to continue to seek ESG, CDBG, VASH, and other funding to provide additional rapid rehousing vouchers. The Athens-Clarke County Continuum of Care implemented the Coordinated Entry partnership in 2017. Coordinated Entry assists local agencies in rapidly identifying, assessing, and appropriately referring individuals experiencing homelessness to the most appropriate provider. Coordinated Entry fosters collaboration between local agencies and Athens-Clarke County Housing and Community Development Department. The Coordinated Entry community partners include Advantage Behavioral Health, Athens Area Homeless Shelter, Project Safe, LiveForward/AIDS Athens, Salvation Army, Family Promise of Athens/Interfaith Hospitality Network, and the Athens-Clarke County School District. The Athens-Clarke County Coordinated Entry partner agencies hold weekly meetings which allows clients to be staffed and prioritized in a client-focused manner. Coordinated Entry provides a forum for agencies to elaborate on current barriers they are facing in the implementation process and collectively strategize on ways to improve the process. These meetings have also proved to be useful in the monitoring and sharing of additional resources in the community which are utilized by agencies to assist individuals and families experiencing homelessness. The Continuum of Care uses Homeless Management Information System (HMIS) to coordinate care, manage operations, share information, and monitor performance on a community-level. The Department of Community Affairs is implementing the Emergency Housing Voucher program using American Rescue Plan (ARP) funding, which will provide Housing Choice Vouchers in connection with Emergency Solutions Grant funding to support homeless housing activities.

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 local hospitals, jail, and regional mental health care providers are active members of the Athens-

Clarke County Continuum of Care with representatives attending regular meetings, serving on the coalition's committees, and coordinating discharge placement.

Discussion

In addition to Community Development Block Grant (CDBG) and HOME funding, HUD offers opportunities for communities to compete nationally for Homeless Assistance Grant Program funding with the intent to alleviate homelessness. As part of the Homeless Assistance Grant Application, HUD requires communities to have a Continuum of Care Plan that outlines the activities and services a community offers to assist homeless individuals move from homelessness to self-reliance. The Homeless Assistance Grant funds supportive services and housing that help homeless persons transition from homelessness to independent living. The Homeless Assistance Grant provides funding for rental assistance that gives applicants flexibility in obtaining appropriate housing. Homeless services are implemented by AIDS Athens Supportive Housing Leasing Program and Advantage Behavioral Health Systems' Supportive Housing Leasing Programs, rapid rehousing program, and Shelter Plus Care Programs. The agencies utilize the grant funds to provide the eligible activities of case management, rapid Rehousing assistance, prevention assistance, and permanent supportive housing assistance to target chronically homeless persons.

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

Introduction:

The primary barrier to affordable housing in Athens-Clarke County, as cited through the citizen participation and review process, is the lack of affordable rental and homeownership units. Many low- and moderate-income persons and households, especially the very low-income ones, homeless, those physically and mentally disabled, frail elderly, and other persons with special needs, have problems locating and obtaining affordable, habitable housing. Athens-Clarke County's primary goal is to increase the amount of affordable housing for low- and moderate-income Athens-Clarke County residents, and to provide access to services that help households access and maintain affordable housing. Strategies to achieve this goal are as follows: Create nodal development tied to transportation, healthcare, schools, jobs, workforce, and housing. Target challenged multi-family developments for major redevelopment and identified other opportunities for redevelopment. Create mixed-income affordable housing developments. Expand housing rehabilitation through: rehabilitation of dilapidated vacant residential properties, repair or rehabilitation of existing housing occupied by low- and moderate-income households, and support of conversion and acquisition of existing structures. Promote homeownership through new construction of affordable housing, homebuyer assistance and housing counseling services. Acknowledge and develop strategies to address issues related to gentrification and combat displacement of existing neighborhood groups. Provide more affordable housing options for the homeless. Create quality housing for seniors using innovative techniques like accessory dwelling units. Preserve existing housing through Code Enforcement practices and housing repairs to ensure older units remain safe and attractive. Educate tenants about their rights and responsibilities. Develop zoning standards and incentives to develop and/or redevelop quality multi-family options for a diverse group. Establish incentives for new development to incorporate environmentally sustainable standards including, but not limited to, material reuse, responsible management of construction waste, etc.

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

The Housing and Community Development Department conducted an Analysis of Impediments to Fair Housing Choice (AI) for Athens-Clarke County (ACC) in 2020 to affirmatively further fair housing and meet federal fair housing regulations. The AI analyzes and develops strategies to overcome any impediments to fair housing choice. The AI further examines the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. An AI that identifies local impediments to fair housing choice and recommends action steps that address and/or alleviate those impediments meets the federal mandate to affirmatively further fair housing. Impediments identified within the AI for ACCGOV are based upon an analysis of ACCGOV's zoning codes, fair housing complaints, interviews with nonprofit and for-profit housing developers and responses from

fair housing surveys completed by ACCGOV housing developers, nonprofit organizations, ACCGOV employees, and private citizens. ACC's Housing and Community Development Department partnered with the Athens Wellbeing Project to commence creation of its Analysis of Impediments submission in compliance with the fair housing planning process that promotes housing choice and fosters inclusive communities free from housing discrimination.

Discussion:

Community partners involved in reducing barriers to affordable housing in Action Plan IV include Historic Athens with funding to provide minor to moderate homeowner rehabilitation activities to 18 historic and historic eligible homes; Athens Area Habitat for Humanity with funding for acquisition, construction, minor to moderate rehabilitation of 24 homes, handicap accessibility improvements for 6 homes, and new construction of 2 single-family home activities; the Athens Housing Authority with funding for acquisition of 2 lots and demolition of 1 dilapidated structure activities; and the Athens Land Trust with funding for acquisition, support of new construction/rehabilitation of 10 new single-family homes, homebuyer down payment assistance to 3 households, and with maintaining operations of 170 affordable housing rental units and single family properties activities. The primary impediment is an inadequate supply of affordable Housing in Athens-Clarke County due to the percentage of residents considered cost burdened as a result of high market rates for rental and homebuyer properties. ACCGOV will continue efforts to address the need of residents being cost burdened through the allocation of federal grant resources that assist in lowering the cost of housing and by forging strong partnerships with for profit & non-profit housing developers and other private entities that provide resources to reduce the cost of housing. ACCGOV will also continue efforts to assist the Economic Development Department with its recruitment of major employers with higher paying jobs that present more opportunities to earn increased wages and raise the average household income. ACC will also collaborate with local industries and Athens Technical College to offer viable training options to increase skill levels of workers. Land use and zoning also contributes to housing impediments regarding the zoning definition for a "family" that restricts more than two unrelated individuals from residing in any single dwelling unit located within Single Family-RS; and Agriculture-AR zoning districts. ACCGOV zoning practices were evaluated in terms of exclusions/acceptability of certain types of single-family housing, i.e. group homes, shelters, and family size. The definition for family limits the ability of residents to live with roommates or personal aides. This provides difficulties for those seeking to offset household and medical care costs by sharing resources. HCD will continue to review the Zoning Ordinance definition and work to streamline processes for the issuance of zoning and building permits (such as voluntary inclusionary zoning) and variances that will remove constraints to building affordable housing and increase housing choice for ACC residents.

AP-85 Other Actions – 91.220(k)

Introduction:

Athens-Clarke County continues to face challenges regarding those less fortunate. . As of the 2021 Census Quick Facts, ACC has a poverty rate of 26.6%. In 2021 ACS data, 21% of people were in poverty. An estimated 25.8% of children under the age of 18 were below the poverty level, compared with the 11.1% of people 65 years old and over. An estimated 29.5% of people 18 to 64 years were below the poverty level. In 2021, 9.7% of households received SNAP (the Supplemental Nutrition Assistance Program), with an understanding that a large portion of the population eligible for this assistance aren't utilizing it. An estimated 48.6% of households that received SNAP had children under 18, and 35.6% of households that received SNAP had one or more people 60 years and over. ACCGOV continues to experience a large population within the federal poverty guidelines, suggesting an ongoing need for expanded affordable housing options and availability and need for higher paying, living-wage jobs. Therefore, the primary obstacles to overcoming ACCGOV's underserved housing and community development needs is the lack of household income and the lack of affordable housing options. Approximately 21 % of the county population lives in poverty. With the sales prices for single family homes in ACC averaging \$ \$199,300 and rents averaging \$\$939, the need for more affordable housing options is an ongoing issue. Despite the rate of increased construction over the past ten years, only 11% of the multifamily units erected are for non-students and meet affordability standards. From 2019-2021, renter occupied units account for 61.5% of the housed population. This reveals the lack of affordable single-family homes for purchase in the county, and may be indicative of the difficulties many encounter in securing mortgages after the 2008 housing subprime lending crisis. Single-family housing construction has decreased, while surrounding counties are experiencing an increase. Workforce housing is needed as home sale prices are beyond the ability for a median income family to afford. ACC also has a 0% vacancy rate for senior housing, indicating a largely underserved, fixed income population that is growing annually. This type of housing is a valuable commodity, but also one in need of additional supply.

Actions planned to address obstacles to meeting underserved needs

The primary mission of the Athens-Clarke County Consolidated Plan for Housing is to create, foster and maintain affordable housing in the community. ACC's plan includes increasing affordable housing activities and production through an ongoing and continuously updated strategic planning process that will result in greater funding opportunities, adequate supply of reasonably priced housing in target areas and better community awareness of all housing programs and services. The Athens Housing Authority, the Athens Land Trust, Athens Area Habitat for Humanity, and Historic Athens (formerly the Athens-Clarke Heritage Foundation) all work to improve affordable housing (to build new low-cost homes, repair deteriorating ones, and create affordable rental units). The Athens Housing Authority has created a new affordable senior housing facility, and two mixed housing multifamily units for mostly LMI persons. AHA completed construction of 2 single family, affordable homebuyer HOME-assisted units.

Athens Land Trust constructed 2 new homebuyer units at one location. ALT continues rental rehabilitation for seven affordable housing projects. ALT will soon start the construction phase of 8 single family, affordable homebuyer units. Athens Area Habitat for Humanity has completed construction of 2 new affordable single-family homes (2 HOME-assisted units) in the current year, and are in the development phase for two single family, affordable homebuyer units. Fair, unbiased access to housing is also a priority, and HCD funds housing counseling services to assist LMI persons in securing successful pathways to home ownership choices. Consolidated Plan housing activities for Action Plan I-III foster and maintain affordable housing options to include new construction, acquisition, rehabilitation, homeowner repair, in-fill housing, first-time home buying, down payment assistance, fair housing, and housing counseling services.

Actions planned to foster and maintain affordable housing

The Housing and Community Development Department conducted an Analysis of Impediments to Fair Housing Choice (AI) for Athens-Clarke County (ACC) in 2020 to affirmatively further fair housing and meet federal fair housing regulations. The AI analyzes and develops strategies to overcome any impediments to fair housing choice. The AI further analyzed the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. An AI that identifies local impediments to fair housing choice and recommends action steps that address and/or alleviate those impediments meet the federal mandate to affirmatively further fair housing. Impediments identified within the AI for ACC are based upon an analysis of ACC's zoning codes, fair housing complaints, interviews with nonprofit and for-profit housing developers and responses from fair housing surveys completed by ACC housing developers, nonprofit organizations, ACC employees, and private citizens. HCD maintains a link on the Athens-Clarke County web page to HUD's Office of Fair Housing: <https://www.acgov.com/4524/Fair-Housing-Choice>. Individuals may also contact HUD's Office of Fair Housing and Equal Opportunity or file a housing discrimination complaint online. HUD's online complaint form is linked from ACC's webpage and is prominently featured. ACC will thoroughly review any allegation to determine if the claims raised are jurisdictional under the Fair Housing Act. April is Fair Housing month and the Housing and Community Development Department partners annually to raise awareness of Fair Housing rights and responsibilities. Notices are placed in visible county locations to ensure the public is aware of Fair Housing rights. HCD recently appointed Community Development Specialist, Hannah Savard as HCD's Fair Housing Specialist. ACC will host Fair Housing events and partner with other events to promote Fair Housing, Affordable Housing, Economic Development, Community Development, and Consolidated Plan.

Actions planned to reduce lead-based paint hazards

Athens-Clarke County has coordinated efforts for lead paint identification and abatement with local housing agencies that include the Athens Housing Authority, Athens Area Habitat for Humanity, Athens Land Trust, and Athens-Clarke Heritage Foundation dba Historic Athens. For all properties built prior to 1978, a presumption of Lead Based Paint requires safe work practices be adopted for any rehabilitation

project. Households receiving assistance are provided with the Lead Hazard Information pamphlet, and a signed form is placed in the client file indicating receipt. If a project repair disturbs any lead-based paint surfaces, the following criteria will not be exceeded: Minor maintenance or repair activities where less than six square feet of lead-based paint is disturbed in a room or where less than 20 square feet of lead-based paint is disturbed on the exterior. Window replacement is not minor maintenance or repair, and therefore, is not an allowable project activity. Projects conducted on homes constructed after 1978, or activities that do not disturb lead-based paint surfaces, will complete an exemption form and place it in the client file. Any project exceeding services above the \$5,000 threshold requires the consultation and services of a Qualified Environmental Professional for recommendations of the management or abatement of lead-based paint surfaces according to all EPA and HUD guidelines. Prior to initiating any housing activity involving CDBG or HOME funds, an assessment of the home must be performed by a Qualified Environmental Professional to determine the presence and/or level of lead-based paint. The QEP assessment determines the level of work required to provide necessary protection against all lead-based paint exposure, including interim controls and abatement procedures. A clearance exam is also required to ensure all lead-based paint surfaces have been properly controlled or abated before any rehabilitation services are provided.

Actions planned to reduce the number of poverty-level families

The Athens-Clarke County anti-poverty strategy is to create an atmosphere conducive to employment as the vehicle through which those who are impoverished can best achieve self-sufficiency. Athens-Clarke County's top five industry sectors are Education, Healthcare, Retail, Hospitality, and Manufacturing; growth was seen in all sectors. The goal is to create an economic climate that leads to the availability of a wide range of possible jobs available for area residents including those living in poverty and to provide services to help those living in poverty overcome barriers to employment. ACC is in the process of developing a Homeless Strategic Plan and an Affordable Housing Strategic Plan that will guide future funding allocations for anti-poverty and affordable housing activities. ACC conducted extensive citizen outreach to develop its HOME-ARP Allocation Plan and will incorporate all data, information and comments into the Homeless and AH strategies.

Actions planned to develop institutional structure

The Department of Housing and Community Development partners with a variety of community groups to provide essential services to very low, low, and moderate-income households in Athens-Clarke County to improve the delivery system through the network of working relationships established with other not-for-profit organizations and units of government. The institutional structure includes private industry, nonprofit organizations, and public institutions. The ACC Housing and Community Development Department (HCD) is responsible for identifying problems and needs that exist in the community as well as identifying and securing resources needed to effectively address them. HCD encourages efforts to enable, empower, and involve the disadvantaged, address the causes of crime, work to enhance the quality of life of all citizens, and to help ensure that the ACC government will be

responsive to the needs of all citizens. HCD supports the mission to provide affordable housing, economic opportunities, and a suitable living environment. HCD contracts with various nonprofit and faith-based organizations to carry out their mission. HCD also works with private businesses for the development and creation of jobs and for housing construction, rehabilitation, and repairs. Contracts for the delivery of housing and community development services are performance-based and adhere to HUD regulatory guidelines. In addition, HCD administers CDBG to assist low-mod income ACC residents in demolishing dangerous structures.

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

Athens-Clarke County will continue to participate in the Homeless Coalition planning processes for the Continuum of Care and to participate as alumni of the Georgia Initiative for Community Housing (GICH) Athens Team.

Discussion:

Basic public service needs including health care, home health care, transportation, childcare, senior services, homeless services, and other types of assistance were identified through community assessments and surveys conducted in Athens-Clarke County. Housing needs include affordable rental and owner-occupied housing, housing rehabilitation, weatherization, and lead-based paint hazard control. The development of new affordable housing continues to be limited to the availability of land near community resources and necessary infrastructure. Each activity in the Action Plan addresses obstacles to meeting underserved needs. ACC will continue to support non-profit agencies, the local housing authority, homeless service providers, and special needs groups to meet the needs of the underserved persons in the community. Consolidated Plan housing activities for Action Plan I will foster and maintain affordable housing projects that include new construction, acquisition, rehabilitation, home repair, in-fill housing, first-time home buying, down payment assistance, fair housing education, and housing counseling services. With the partnership of several non-profit partners to assist with this mission, new and rehabilitated rental and homeownership opportunities will continue to be focused in low to moderate income areas and marketed to low- and moderate-income people. Many LMI families who rent are significantly cost burdened, so Athens-Clarke County will continue to assist with the development of affordable rental opportunities along with homeownership opportunities. The East Athens and Hancock Corridor Neighborhood Revitalization areas will be given priority regarding housing developments, while home rehabilitation will focus on the neighborhood revitalization areas and LMI homeowners county-wide.

Program Specific Requirements

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

Introduction:

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

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

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

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

Athens-Clarke County does not perform any activities not included in 92-205.

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

Athens-Clarke County Unified Government HOME Program or its Subrecipients, CHDOs, Owners, Developers or Sponsors utilize the resale/recapture methods for HOME homebuyer programs in accordance with 24 CFR 92.254(a)(5). Specifically, all HOME-assisted homebuyer housing must have an initial purchase price that does not exceed 95% of the median purchase price for the area, be the principal residence of an owner whose family qualifies as low-income at the time of purchase, and be subject to either resale or recapture provisions. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability. Athens-Clarke County has defined Development Subsidy, Direct Subsidy and Net Proceeds within the written resale/recapture provisions.

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:

HOME rule at 24 CFR 92.254(a)(4) establishes a period of affordability for homebuyer housing. ACC calculates the amount of HOME assistance per unit and the applicable period of affordability depending on whether the unit is under resale or recapture provisions. Under resale, the period of affordability is based on the total amount of HOME funds invested. Any HOME program income used to assist the project is included when determining the period of affordability. The resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. For HOME-assisted homebuyer units, under the recapture option, the period of affordability is based upon the HOME funded Direct Subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. The recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. Sale during the affordability period results in repayment of the subsidy. The amount is limited to the proceeds from the sale. The original buyer is not required to sell the unit to a low-income buyer. If insufficient equity exists in the unit to allow for return on investment and recapture, the amount may be reduced based on the length of

occupancy and the affordability period. If there are insufficient proceeds at sale, ACC is not required to repay the difference between the subsidy and the recaptured amount. A written agreement imposes the requirements in HOME-assisted projects under recapture provisions. If the unit is not the principal residence during the affordability period and is sold the subsidy minus principal payments is due. If the event of foreclosure the attempt to recoup proceeds may be available through the foreclosure sale. Recaptured funds must be used to assist other HOME program beneficiaries. If the unit is no longer the principal residence it will be available for sale. The subsequent purchaser must be income eligible and buy the unit at a reasonable price, occupy the property as a principal residence, and assume the remainder of the affordability period. The repayment of the loan does not end the affordability period. The requirement ensures the price at resale provides the original owner a fair return on investment and ensures the housing will remain affordable. Resale provisions are waived during the affordability period if the owner defaults on the mortgage and foreclosure proceedings are initiated. Appreciation during the term of ownership is shared by ACC and the owner. Fair Return on Investment: ACC's Resale Provisions shall ensure that, if a property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and any capital improvement).

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:

ACC has no plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. Resale/Recapture continued: The value of capital improvements is defined by the County as the actual, documented costs of permanent structural improvements or the restoration of some aspect of a property that either will enhance the property value or will increase the useful life of the property. To be considered by the County in determining fair return on investment, the actual costs of the capital improvements must be documented with receipts, canceled checks, or other documents acceptable to Athens-Clarke County. The Fair return will be based upon an objective standard or publicly available index. The objective standard will be a percentage of the change in median sales prices over the period of ownership or the appraisal-based resale method. The public available index is the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency and will be used to calculate the percentage of change. Due to the stability of the housing market, the resale provisions reflect a market approach allowing the seller to receive a fair market return, and presumes a buyer will be able to afford the market price without subsidy. Since the seller will obtain the proceeds, they are receiving a fair return. If adjustments are necessary to maintain the property as affordable to a new buyer, it will be ACC's responsibility. The buyer will receive a return based on the market value at sale minus outstanding indebtedness, including the subsidy. The assumption in stable markets is that the market allows the unit sale to proceed without subsidy. Should the property not be affordable at sale, ACC will reduce the subsidy due from the seller by the amount necessary to make the new mortgage principal, interest, taxes,

and insurance affordable to the buyer. This market approach provides a high level of encouragement for homeowners to maintain and upgrade their property in order to obtain maximum return on investment. The forgiveness of some interest and/or principal and interest is more efficient for Athens-Clarke County to implement than committing new HOME funds for the subsequent purchaser. If new HOME dollars are provided to the subsequent purchaser to render the PITI affordable it would require that the affordability period start again. An updated analysis is not warranted by any changes in the community's market conditions. In the absence of significant changes to the housing market, ACC will continue its use of the presumption of affordability based on the housing market analysis in the Annual Action Plan.

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

Under the Athens-Clarke County HOME program, the Housing and Community Development Department (HCD) accepts applications from eligible non-profit organizations and select for-profit organizations to undertake affordable housing development projects that will provide decent, affordable housing for low-income residents. All projects must be located within the geographic boundaries of Athens-Clarke County, GA. ACC (HCD) must use 100% percent of its HOME funds to assist families who are below 80% of the area median income based on HUD's Adjusted HOME median income limits for Athens-Clarke County. HCD strives to target its HOME resources to provide affordable housing

to low-income and very low-income families and individuals. The eligibility of households for HOME assistance varies with the nature of the funded activity, additional targeting requirements apply for rental housing. HOME dollars are allocated to qualified Community Housing Development Organizations (CHDOs), Public Housing Agencies (PHAs), Owners, Developers, and Sponsors (For-Profit and Nonprofit), Subrecipients, and Others, subject to homebuyer or rental projects. HCD Outreach efforts include but not limited to informational sessions, non-profit meetings, civic events, contacting developers, CHDO's and owners interested in increasing affordable housing for lower income households in Athens-Clarke County. HOME dollars are allocated in support of homebuyer activities, homeowner rehabilitation projects, and rental housing projects. Examples of these activities include but are not limited to acquisition, new construction, subdivision development, reconstruction and demolition. Applications are now accepted once a year, and available funds are announced publicly through newspaper postings and website posting. Applications are subject to threshold requirements and a review process. Awards are based on fund availability and will be granted to the applicant or applicants that receive the highest score based on published scoring criteria found on HCD's website at <https://www.accgov.com/5553/HOME-Program>.

Attachments

Citizen Participation Comments

ACC HCD Citizen Participation Comments at Public Hearings: 03/21/2023 and 04/04/2023

Public Input Received during March 21, 2023 Agenda Setting Meeting:

- Danielle Bonanno – Supports CDBG funding for Athens Pride and Queer Collective
- Stephanie Whit – Supports CDBG funding for Athens Pride and Queer Collective
- Jenny Wares, M.D. – Supports CDBG funding for Athens Pride and Queer Collective
- Cameron J. Harrelson – Supports CDBG funding for Athens Pride and Queer Collective

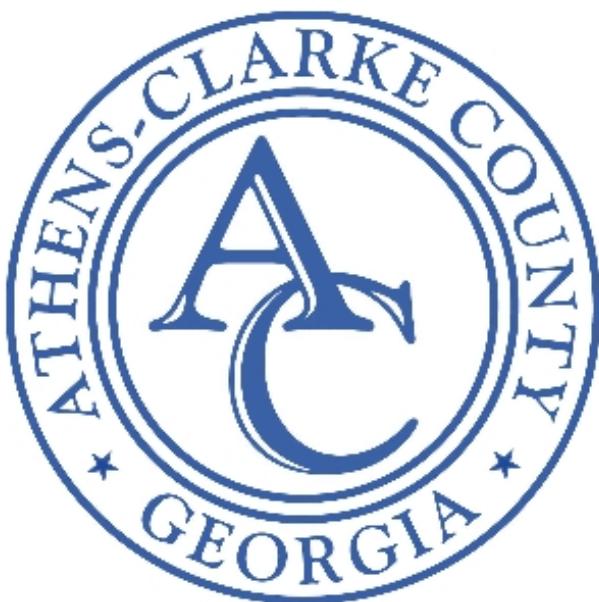
Public Input Received during April 4, 2023 Voting Meeting:

- Kathryn Fowler- concerned about funding for senior transportation not being recommended for funding for CDBG funding

Public Input Received during 30-day posting of Annual Action Plan IV from April 10 through May 10, 2023:

No public comments were received during the 30-day public review period for the ACC HCD Annual Action Plan IV draft posted from April 10, 2023 through May 10, 2023.

Athens-Clarke County
Annual Action Plan IV
2023 – 2024



Appendix

1

Contents

Annual Action Plan IV Advertisements and Public Notices

 Athens Banner Herald ACC RFP and Public Notice Advertisement 10/02/2022

 ACC HCD Website RFP and Public Notice 10/03/2022

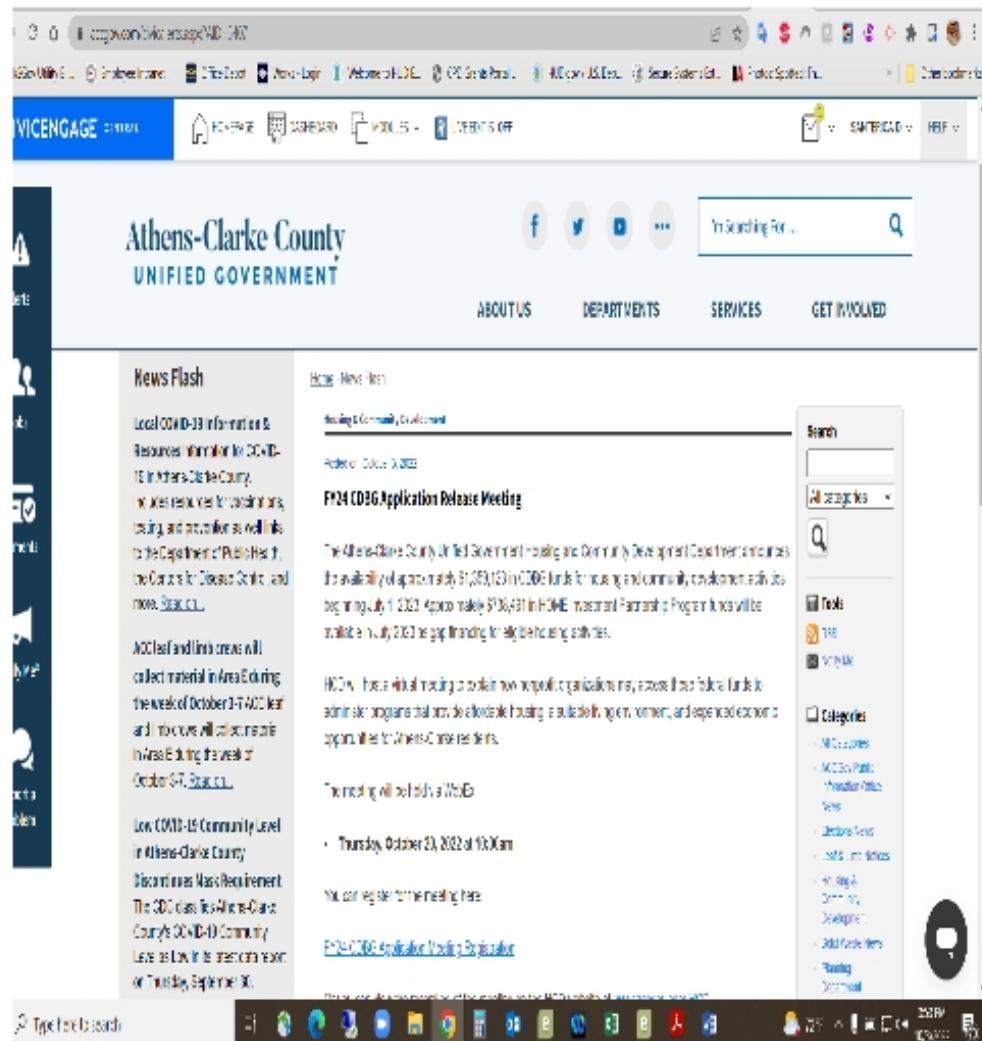
 ACC HCD Website AAP IV CDBG Funding Recommendations Public Hearings Notice 03/10/2023

 Athens Banner Herald AAP IV CDBG Public Notice 04/09/2023

 Athens-Clarke County HOME Resale/Recapture Provisions

 Affirmatively Furthering Fair Housing Public Participation

ACC HCD Website RFP and Public Notice 10/03/2022



The screenshot shows the homepage of the Athens-Clarke County Unified Government website. The header features the ACC logo and navigation links for About Us, Departments, Services, and Get Involved. A search bar and social media icons are also present. The main content area includes a news flash about COVID-19 information and resources, and a section about the P24 CDBG Application Release Meeting. A sidebar on the right contains a search bar, filters for news type (Local, State, National), and a category list including ACC News, ACC Events, ACC Press Releases, ACC Photo, ACC Video, ACC News, ACC Events, ACC Press Releases, ACC Photo, and ACC Video.

News Flash

[Local COVID-19 Information & Resources](#) [Information & Resources](#) [COVID-19](#) [Athens-Clarke County](#)

With resources in positions, testing and activities as well as the Department of Public Health, the County of Athens-Clarke, and now, [Georgia](#).

ACC staff and citizens will collect material in [Area B](#) during the week of October 1-7, 2022, and to cover all other areas in [Area B](#) during the week of October 8-14, 2022.

[Low COVID-19 Community Level in Athens-Clarke County](#)

[Discusses New Requirement](#)

The ACC has [Revised](#) [Athens-Clarke County COVID-19 Community Level](#) to [Low](#) on [Wednesday, October 5, 2022](#).

P24 CDBG Application Release Meeting

The Athens-Clarke County Unified Government Housing and Community Development Department announces its availability of approximately \$1,050,000 in CDBG funds for housing and community development activities beginning July 1, 2023. Approximately \$106,000 in HOME Investment Partnership Program funds will be available in July 2023 for gap funding for eligible housing activities.

HCD will be holding a virtual meeting to inform non-profit organizations, area foundations, funds, administrative agencies, and local housing authorities of government, and regional economic opportunities to Athens-Clarke residents.

The meeting will be held on [Thursday, October 20, 2022 at 10:00am](#).

You can register for the meeting [here](#).

[P24 CDBG Application Release Meeting](#)

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ACC HCD Website AAP IV CDBG Funding Recommendations Public Hearings Notice 03/10/2023

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Athens Banner Herald AAP IV Public Notice 04/09/2023

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Athens-Clarke County HOME Program Resale/Recapture Provisions

Athens-Clarke County HOME Program Resale/Recapture Provisions

I. BACKGROUND

Section 215 of the HOME statute establishes specific requirements that all HOME-assisted homebuyer housing must meet in order to qualify as affordable housing. Specifically, all HOME-assisted homebuyer housing must have an initial purchase price that does not exceed 95% of the median purchase price for the area, be the principal residence of an owner whose family qualifies as low-income at the time of purchase, and be subject to either resale or recapture provisions. The HOME statute states that resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including any improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The HOME statute also specifies that recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. The Athens-Clarke County Unified Government HOME Program utilizes the resale/recapture methods for HOME homebuyer programs in accordance with 24 CFR 92.254(a)(5).

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME PJs must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, *including projects funded with HOME program income*, the Athens-Clarke County Unified Government (ACC) HOME Program must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that ACC submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the County will enforce the provisions.

II. DEFINITIONS

Development Subsidy – a development subsidy is defined as financial assistance provided by the County to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.

Direct Subsidy – a direct subsidy is defined as financial assistance provided by ACC that reduces the purchase price for a homebuyer below market value or otherwise subsidizes the homebuyer [i.e., down-payment loan, purchase financing, assistance to Community Housing Development Organization (CHDO) to develop and sell unit below market or closing cost assistance]. A direct subsidy triggers recapture.

Net Proceeds – the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

III. PERIOD OF AFFORDABILITY

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How the County calculates the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded *Direct Subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods.

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:
Under \$15,000	5 years

Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

IV. RESALE PROVISIONS

Athens-Clarke County's Resale Provisions shall ensure that, when a HOME-assisted homebuyer sells or otherwise transfers his or her property, either voluntarily or involuntarily, during the affordability period:

- 1) The property is sold to another low-income homebuyer who will use the property as his or her principal residence;
- 2) The original homebuyer receives a fair return on investment, (i.e., the homebuyer's down payment plus capital improvements made to the house); and
- 3) The property is sold at a price that is "affordable for a reasonable range of low-income buyers."

a. Applicability

When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers Resale Provisions. ACC shall apply the Resale Provisions to projects receiving development subsidies only, with no direct subsidy to the homebuyer. In the event the County provides a development subsidy (i.e., the difference between the total cost of producing the unit and the fair market value of the property) to CHDOs or sub-recipients and a direct subsidy is subsequently provided to the homebuyer, only the direct subsidy shall be considered and the Recapture (not Resale) Provisions shall be applied.

b. Effect

The HOME rule at §92.254(a)(3) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the Period of Affordability. Under Resale Provisions, if the housing is transferred, voluntarily or otherwise, during the Period of Affordability, it must be made available for subsequent purchase *only* to a buyer whose household qualifies as low-income, and will use the property as its principal residence.

c. Fair Return on Investment

ACC's Resale Provisions shall ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and any capital improvement). The value of capital improvements is defined by the County as the actual, documented costs of permanent structural

improvements or the restoration of some aspect of a property that either will enhance the property value or will increase the useful life of the property. Capital improvements are generally non-recurring expenses, such as the cost of an addition, a remodel, or a new roof. Generally, replacing worn or dated components such as appliances or carpet or repairs and regular maintenance are not considered an improvement that adds value. To be considered by the County in determining fair return on investment, the actual costs of the capital improvements must be documented with receipts, cancelled checks, or other documents acceptable to Athens-Clarke County.

The definition of "Fair return on Investment" is the total homeowner investment which includes the total cash contribution plus the approved capital improvements credits as described below:

- a. The amount of the down payment;
- b. The cost of documented capital improvements, including but not limited to additions to the home such as bedroom, bathroom, or garage; replacement of heating, ventilation, and air conditioning systems; accessibility improvements such as bathroom modifications for disabled or elderly; outdoor improvements such as a new driveway, walkway, retaining wall, or fence.

Note: all capital improvements will be visually inspected to verify their existence.

- c. The Fair return will be based upon an objective standard or publicly available index. The objective standard will be a percentage of the change in median sales prices over the period of ownership or the appraisal-based resale method. The public available index is the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency. It will be used to calculate the percentage of change. The HPI calculator is currently located at

<https://www.fhfa.gov/DataTools/Tools/Pages/HPI-Calculator.aspx>

The calculator projects what a given unit would be worth today from the point of time it was purchased. The calculation is for the Metropolitan Statistical Area (MSA) for Athens-Clarke County, GA.

Median Sale Price Resale Method

Athens-Clarke County shall consider a fair return on investment achieved when the original homebuyer (now the seller) receives from the sale a percentage return on investment based on the change in the *Median Sale Price* for the Athens-Clarke County Metropolitan Statistical Area, as published periodically by HUD with the FHA Mortgage Limits (also known as the "203(b) limits"). The HOME units are 95 percent of the median purchase price for the area based on Federal Housing Administration (FHA) single family mortgage program. This method can be used in cases where appraisals are not available.

$$\begin{aligned} \text{Fair Return} = & \text{ (initial investment} \\ & + \text{ value of improvements}) \times \frac{\text{Median Sale Price}^c}{\text{Median Sale Price}^i} \end{aligned}$$

Where *Median Sale Price^c* is the current area median sale price at the time of resale and *Median Sale Priceⁱ* is the initial area median sale price at the time of the homeowner's original purchase transaction.

For example, in 2009 an eligible homebuyer purchases a house that has received a HOME development subsidy and is subject to Resale Provisions. The homebuyer provides \$5,000 for a down payment and in 2011 spends \$10,000 to remodel and upgrade the kitchen. In 2012 the homeowner sells the home. In 2009 the median sale price for the area was \$250,000 and in 2012 the figure is \$268,000. In this example, the fair return on investment is \$16,080.

$$\text{Fair Return} = (\$5,000 + \$10,000) \times \frac{\$268,000}{\$250,000}$$

Appraisal-based Resale Method

The resale price of the home must be based on the original purchase price plus the amount of the fair return on investment to the homeowner at the time of resale.

In order for an appraisal-based resale method to comply with HOME regulations, the process for determining fair return must include two appraisals: one appraisal at initial purchase to determine the fair market value of the home, and a second appraisal at the time of the resale. Both appraisals must be conducted by an independent, third-party appraiser.

The fair return will include the homebuyer's original investment in the property and the increase in market value attributable to homebuyer investments in the property or capital improvements to the property in accordance with 24 CFR §92.254(a)(5)(i), the PJ will:

- 1) Determine the amount of market appreciation, if any, realized over the ownership term by calculating the difference between the initial and resale appraisals. This figure represents the basis for calculating the fair return on investment. In depressed or declining markets, it is possible that the homeowner may not realize a return. A loss on investment can constitute a fair return.

Note: The value of any capital improvements made by the homeowner is included in the home value determined by the resale appraisal. Therefore, the PJ should not include a separate accounting and valuation of the homeowner's capital improvements as described in [Notice CPD12-003](#).

2) Multiply the basis (i.e., difference between initial and resale appraisals) by a reasonable, publicly accessible, clearly defined standard or index. In order to remain objective, the standard or index must be based on the PJ's market conditions.

(Resale Appraisal – Initial Appraisal) x Housing Price index = Fair return on investment to homeowner

Affordable price at sale + Fair return on investment to homeowner = Resale price

Example:

Initial Appraisal (Fair Market Value at Sale): \$200,000

Resale Appraisal (Fair Market Value at Resale): \$275,000

Standard or Index: 25%

Affordable Price at Sale: \$150,000

Increase in Market Appreciation: \$275,000 - \$200,000 = \$75,000

Fair Return on Investment: \$75,000 x .25 = \$18,750

Resale Price: \$150,000 + \$18,750 = \$168,750

Cost of the Appraisal The cost of the appraisals cannot be charged to the homeowner. The PJ can charge the initial appraisal cost as an administrative or project-related soft cost. The subsequent appraisal cost is restricted to a HOME administrative cost unless the subsequent homebuyer receives additional HOME assistance under 24 CFR 92.254(a)(9)(i)(D), in which case the appraisal cost may be charged as a project-related soft cost under 24 CFR 92.206(d)(2).

HUD's Written Approval Per §92.254(a)(5), a PJ must receive HUD's written approval of all resale requirements in a PJ's homeownership program. A PJ must also include the resale requirements in its Annual Action Plan or Consolidated Plan. Please see [Notice CPD-12-003, "Guidance on Resale and Recapture Provision Requirements under the HOME Program"](#) for additional information on requirements for HUD's written approval.

d. Continued Affordability

In addition to ensuring that the HOME-assisted homebuyer receives a fair return on his or her investment, the County's Resale Provisions shall ensure that the housing under a Resale Provision will remain affordable to a reasonable range of low-income homebuyers. Accordingly, ACC shall ensure that the sales price of a home resold under Resale Provisions is within the maximum mortgage capacity of a target population of potential buyers with incomes ranging from 50% to 80% of the Area Median Income (AMI). More specifically, ACC defines "affordable to a reasonable range of low-income homebuyers" as a price at which a family at 50 to 80% of area median income pays no more than 30% of their income for principal, interest, property taxes, and insurance.

In the event the resale price necessary to provide fair return is not affordable to the subsequent low-income homebuyer, the County will provide additional HOME assistance to the new low-income buyer in order to ensure that the price to the buyer is affordable, and the original owner gets a fair return on investment.

e. Presumption of Affordability

In certain neighborhoods, housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the County must complete a market analysis of the neighborhood in which the housing is located, and submit the analysis for HUD review and approval.

Athens-Clarke County makes no Presumption of Affordability regarding neighborhoods in its jurisdiction.

f. Imposing Resale Provisions

A clear, detailed written agreement, executed before or at the time of sale, ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If Athens-Clarke County provides HOME funds to a sub-recipient or CHDO to develop and sell affordable housing, the County must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

While mortgage and lien documents are used to secure repayment of the HOME subsidy, these documents are not sufficient to enforce the Resale Provisions. Separately recorded deed restrictions will be used to impose the Resale Provisions (§92.254(a)(5)(i)(A)) in HOME-assisted homebuyer projects under the resale option. The purpose of these enforcement mechanisms is to secure and retain the affordable re-use of the property, while providing a fair return to the seller.

g. Foreclosure

In HOME-assisted homebuyer projects, the affordability restrictions imposed by deed restrictions, covenants running with the land, or other similar mechanisms may terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. In such cases, the termination of the affordability restrictions does not satisfy the requirement that the property

remains qualified as affordable housing under §92.254 for the period of affordability.

Consequently, for HOME-assisted homebuyer housing under a Resale Provision, if the affordability is not preserved by a subsequent purchase at a reasonable price by a low-income homebuyer who will use the property as its principal residence, and who agrees to assume the remainder of the original affordability period, the County shall repay the full amount of the HOME investment.

h. Enforcement

In the event of non-compliance by the homebuyer which includes failure: to maintain property as principal residence, pay taxes, assessments or insurance premiums, failure to comply with any of the enforcement terms, the County will consider this as a breach of covenant and the County may, at its option and without notice, declare the entire indebtedness due.

V. RECAPTURE PROVISIONS

Unlike the resale approach, Athens-Clarke County's Recapture Provisions permit the original homebuyer to sell the property to any willing buyer, at any price the market will bear, during the period of affordability while the County is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

a. Applicability

Recapture Provisions are Athens-Clarke County's preferred mechanism for securing HOME Program investments and are generally applicable to all County homebuyer activities, unless circumstances otherwise require Resale Provisions be used. Specifically, Recapture Provisions are always used in cases involving a Direct Subsidy to a homebuyer. Recapture provisions cannot be used when a project receives only a Development Subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, Resale Provisions must be used in this case.

b. Effect

If a homeowner chooses to sell during the Period of Affordability, the full amount of the HOME Program Direct Subsidy (specifically excluding the amount of any Development Subsidy) shall be recaptured and repaid to the County provided that net proceeds are sufficient. Recaptured funds shall be returned to the Athens-Clarke County HOME Trust Fund to be reinvested in other affordable housing for low to moderate income persons. If net proceeds are insufficient to repay the total HOME investment due, only a pro-rata share of the net proceeds, as set forth in the formulas below, will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies, but there are no funds to recapture.

c. Imposing Recapture Provisions

A clear, detailed written agreement, executed before or at the time of sale, ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If Athens-Clarke County provides HOME funds to a sub-recipient or CHDO to develop and sell affordable housing, the County must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

The written agreement between the homebuyer and Athens-Clarke County, as well as mortgage and lien documents are all used to impose the Recapture Provisions in HOME-assisted homebuyer projects under the recapture option. The purpose of these enforcement mechanisms is to ensure that Athens-Clarke County recaptures the Direct Subsidy to the HOME-assisted homebuyer if the HOME-assisted property is transferred. Unlike the resale option, deed restrictions, covenants running with the land, or other similar mechanisms are not required by the HOME rule to be used in homebuyer projects under the recapture option.

As provided in §92.254 (a)(5)(ii)(A), there are several options that Athens-Clarke County may use that are acceptable to HUD to recapture funds and no option may capture more than the net proceeds, if any. The option that Athens-Clarke County has elected to use, in the event that the net proceeds are not sufficient to recapture the entire Direct HOME Subsidy amount, is the *Shared net proceeds option*:

Shared net proceeds. If the net proceeds are insufficient to recapture the full HOME investment, only a pro-rata share of the net proceeds, as set forth in the formulas below, will be recaptured.

Formula will include the sales price minus loan repayment (other than HOME funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

$$\begin{array}{c}
 \text{HOME Investment} \\
 \hline
 \text{recaptured} \\
 \text{-----} \\
 \text{(HOME Investment + homeowner investment)} \\
 \end{array}
 \quad
 \begin{array}{l}
 X \text{ Net Proceeds} = \text{HOME Amount to be} \\
 \text{-----} \\
 \text{(HOME Investment + homeowner investment)}
 \end{array}$$

$$\begin{array}{c}
 \text{Homeowner Investment} \\
 \hline
 \text{-----} \\
 \text{(HOME Investment + homeowner investment)} \\
 \end{array}
 \quad
 \begin{array}{l}
 X \text{ Net Proceeds} = \text{Amount to homeowner} \\
 \text{-----} \\
 \text{(HOME Investment + homeowner investment)}
 \end{array}$$

d. Foreclosure

Homebuyer housing with a Recapture Provision is not subject to the affordability requirements after Athens-Clarke County has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, the County shall attempt to recoup any net proceeds that may be available through the foreclosure sale. The County is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, the COUNTY may only recapture the actual net proceeds, if any. Upon distribution of proceeds, all obligations for continued affordability are satisfied.

E. Enforcement

In the event of non-compliance by the homebuyer which includes failure to maintain property as principal residence, pay taxes, assessments or insurance premiums, the County will consider this as a breach of covenant and the County may, at its option and without notice, declare the entire indebtedness due.

VI. REFINANCING POLICY

Athens-Clarke County shall carefully review all requests for subordination on a case-by-case basis in order to protect its interests and the interests of the homebuyer. The conditions under which Athens-Clarke County will agree to subordinate to new debt are as follows:

- 1) The refinancing must be necessary to reduce the owner's overall housing costs, or
- 2) The refinancing must otherwise make the housing more affordable, AND
- 3) Refinancing for the purpose of taking out equity is not permitted.

Upon receipt of a subordination request from a lender or homebuyer, the County will review the terms of the refinancing to determine whether the above criteria are met. The County may require additional documentation from the homeowner or lender in order to make its determination. Once complete information is received, a subordination decision is made within 15 business days.

VII. MONITORING RESALE & RECAPTURE PROVISIONS

For HOME-assisted homebuyer projects, Athens-Clarke County shall require its CHDOs and sub-recipients, through written CHDO or Sub-recipient agreements, to perform ongoing monitoring of the principal residency requirement during the period of affordability. Confirmation that the buyer is using the property as his or her principal residence may be accomplished by verifying that the buyer's name appears on utility company records or insurance company records for the home. In addition, postcard or letters mailed with "do not forward" instructions may demonstrate whether the buyer is receiving mail at the home.

Failure to comply with the resale or recapture requirements means that:

- 1) the original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or
- 2) the home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced.

In cases of noncompliance under either resale or recapture provisions, Athens-Clarke County must repay to its HOME Investment Trust Fund in accordance with §92.503(b), any *outstanding HOME funds* invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy to the developer plus any HOME down payment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount.

Affirmatively Furthering Fair Housing Public Participation

On July 16, 2015, the Department of Housing and Urban Development published Affirmatively Furthering Fair Housing: Final Rule (24 CFR Parts 5, 91, 92, et al.), effective August 17, 2015. The major provisions of the Final Rule include:

1. Preparation of an Assessment of Fair Housing (AFH) by identifying and evaluating local and regional fair housing issues and factors contributing to fair housing issues;
2. Establishment of fair housing goals to address these issues and contributing factors;
3. Incorporation of fair housing planning into existing planning process and the Consolidated Plan, which, in turn, incorporate fair housing priorities and goals into housing and community development decision making;
4. Participation in regional collaboration to address fair housing issues; and

5. Provision of an opportunity for public participation and input.

As required per 24 CFR 91.105(a)(1) and (a)(2)(i) through (iii), 91.501(a)(4), (b), (c), (e)(1), (f) through (j) and (l), the Housing and Community Development (HCD) Department will complete the following items:

1. Efforts will be made to encourage participation of local institutions, Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, and community-based and faith-based organizations in the process of developing and implementing the Assessment of Fair Housing (AFH).
2. In consultation with the Athens Housing Authority, their residents as well as the public, will be encouraged to participate in the process of developing and implementing the AFH.
3. HUD provided data and any other supplemental information the Housing and Community Development Department plans to incorporate into the AFH, will be made available to the public as soon as feasible following the start of the public participation process.
4. At least one public hearing will be held, inviting community input on the draft AFH, with reasonable steps made to provide language assistance to ensure meaningful access to participation by non-English-speaking and limited English proficiency residents of the community. Notice of the public hearing will be published at least 45 days prior to the time of the meeting. All meetings and public hearings will be held in locations accessible to people with disabilities.
5. Comments or views of residents received in writing, or orally at the public hearing in preparation of the final AFH will be considered and summarized in the AFH. A summary of comments not accepted and the reasons why will be attached to the AFH.
6. Notice of the public hearing will be published in the Athens Banner-Herald newspaper and on the HCD website, 45 days prior to the public hearing date.
7. A summary of the proposed AFH will be published in the Athens Banner-Herald newspaper in a manner that affords residents, public agencies and other interested parties a reasonable opportunity to examine its contents and to submit comments. The summary will include a list of all locations the proposed AFH document may be freely and publicly viewed. The public review and comment period will be no less than 45 days.

- 8 The draft AFH will be published on the Unified Government of Athens-Clarke County Housing and Community Development Department website, at the Housing and Community Development Department office, the Athens Housing Authority office, the two Athens-Clarke County Library locations (Baxter St. and 1465 Hwy 29 North), the East Athens Development Corporation, and the Hancock Community Development Corporation. If requested, a reasonable number of free copies may be provided by HCD and the AHA to local residents and groups.
- 9 The AFH will be submitted to HUD for review and approval 270 days prior to submission of the Consolidated Plan.
- 10 Final adoption of the AFH is the responsibility of the Unified Government of Athens-Clarke County Mayor and Commission.

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>		
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>		
State Use Only:			
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>		
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text"/> United Government Athens-Clarke County			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/>		* c. UEI: <input type="text"/>	
d. Address:			
* Street1: <input type="text"/>	Street2: <input type="text"/>		
* City: <input type="text"/>	County/Parish: <input type="text"/>		
* State: <input type="text"/>	Province: <input type="text"/>		
* Country: <input type="text"/>			
* Zip / Postal Code: <input type="text"/>			
e. Organizational Unit:			
Department Name: <input type="text"/>	Division Name: <input type="text"/>		
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: <input type="text"/>	* Middle Name: <input type="text"/>	* First Name: <input type="text"/>	
* Last Name: <input type="text"/>		Suffix: <input type="text"/>	
Title: <input type="text"/>			
Organizational Affiliation: <input type="text"/>			
* Telephone Number: <input type="text"/>		Fax Number: <input type="text"/>	
* Email: <input type="text"/>			

Application for Federal Assistance SF-424				
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p><input type="text" value="X: Other (Specify)"/></p> <p>Type of Applicant 2: Select Applicant Type:</p> <p><input type="text"/></p> <p>Type of Applicant 3: Select Applicant Type:</p> <p><input type="text"/></p> <p>* Other (specify):</p> <p><input type="text" value="United City-County Government"/></p>				
<p>* 10. Name of Federal Agency:</p> <p><input type="text" value="US Department of Housing and Urban Development"/></p>				
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p><input type="text" value="14.210"/></p> <p>CFOA Title:</p> <p><input type="text" value="Community Development Block Grant (CDBG) Entitlement Grant"/></p>				
<p>* 12. Funding Opportunity Number:</p> <p><input type="text" value="B-23-HC-13-0007"/></p> <p>* Title:</p> <p><input type="text" value="Community Development Block Grant (CDBG) Entitlement Grant"/></p>				
<p>13. Competition Identification Number:</p> <p><input type="text"/></p> <p>Title:</p> <p><input type="text"/></p>				
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p><input type="text"/></p> <p><input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></p>				
<p>* 15. Descriptive Title of Applicant's Project:</p> <p><input type="text" value="FY24 CDBG Entitlement Grant"/></p>				
<p>Also: supporting documents as specified in agency instructions.</p> <p><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></p>				

Application for Federal Assistance SF-424				
16. Congressional Districts Of:				
* a. Applicant	GA-010			
* b. Program/Project				
GA-010				
Attach an additional list of Program/Project Congressional Districts if needed.				
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>				
17. Proposed Project:				
* a. Start Date:	07/01/2023			
* b. End Date:				
06/30/2024				
18. Estimated Funding (\$):				
* a. Federal	1,220,765.00			
* b. Applicant				
* c. State				
* d. Local				
* e. Other				
* f. Program Income				
* g. TOTAL	1,220,765.00			
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?				
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .				
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.				
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.				
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)				
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
If "Yes", provide explanation and attach				
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>				
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)				
<input checked="" type="checkbox"/> ** I AGREE				
** The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.				
Authorized Representative:				
Prefix:	<input type="text"/> Ms.	* First Name:	<input type="text"/> Kelly	
Middle Name:	<input type="text"/>			
* Last Name:	<input type="text"/> GILDED			
Suffix:	<input type="text"/>			
* Title:	<input type="text"/> Mayor			
* Telephone Number:	<input type="text"/> 706-613-3610		Fax Number:	<input type="text"/>
* Email:	<input type="text"/> kelly.gilded@bluegreen.com			
* Signature of Authorized Representative:				* Date Signed: <input type="text"/> 5-13-2023

Application for Federal Assistance SF-424			
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="checkbox"/> Other (Specify) _____	
*3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>		
5a. Federal Entity Identifier: <input type="text"/> GA120160	5b. Federal Award Identifier: <input type="text"/>		
State Use Only:			
6a. Date Received by State: <input type="text"/>	6b. State Application Identifier: <input type="text"/>		
B. APPLICANT INFORMATION:			
*a. Legal Name: <input type="text"/> Unified Government Athens-Clarke County			
*b. Employer/Taxpayer Identification Number (EIN/TIN) <input type="text"/> 50-151116	*c. DIB: <input type="text"/> 0XLY3A9v965		
d. Address:			
* Street1: <input type="text"/> 375 Sartell Avenue	Street2: <input type="text"/>		
* City: <input type="text"/> Athens	County/Parish: <input type="text"/>		
* State: <input type="text"/> GA: Georgia	Province: <input type="text"/>		
* Country: <input type="text"/> USA: UNITED STATES			
* Zip / Postal Code: <input type="text"/> 30601-1731			
e. Organizational Unit:			
Department Name: <input type="text"/> Housing & Community Development	Division Name: <input type="text"/> Housing & Community Development		
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: <input type="text"/> Mr.	* First Name: <input type="text"/> Rodriguez		
Middle Name: <input type="text"/>			
* Last Name: <input type="text"/> Wallace			
Suffix: <input type="text"/>			
Title: <input type="text"/> Director			
Organizational Affiliation: <input type="text"/>			
* Telephone Number: <input type="text"/> 706-513-3155	Fax Number: <input type="text"/> 706-513-3156		
* Email: <input type="text"/> roderick.wallace@acgov.org			

Application for Federal Assistance SF-424				
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p><input type="text"/> Other (specify)</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p><input type="text"/></p> <p>Type of Applicant 3: Select Applicant Type:</p> <p><input type="text"/></p> <p>* Other (specify):</p> <p><input type="text"/> United City-County Government</p>				
<p>* 10. Name of Federal Agency:</p> <p><input type="text"/> US Department of Housing and Urban Development</p>				
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p><input type="text"/> 16.239</p> <p>GFDA Title:</p> <p><input type="text"/> HOME Investment Partnerships Program (HOME) Entitlement Grant</p>				
<p>* 12. Funding Opportunity Number:</p> <p><input type="text"/> R-23-002-13-0103</p> <p>* Title:</p> <p><input type="text"/> HOME Investment Partnerships Program (HOME) Entitlement Grant</p>				
<p>13. Competition Identification Number:</p> <p><input type="text"/></p> <p>Title:</p> <p><input type="text"/></p>				
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p><input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></p>				
<p>* 15. Descriptive Title of Applicant's Project:</p> <p><input type="text"/> FY21 HOME Entitlement Grant</p>				
<p>Attach supporting documents as specified in agency instructions.</p> <p><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></p>				

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
* a. Applicant	CA-010		
* b. Program/Project			
* b. Program/Project Congressional Districts if needed.			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
17. Proposed Project:			
* a. Start Date:	07/01/2023		
* b. End Date: 05/30/2024			
18. Estimated Funding (\$):			
* a. Federal	852,868.00		
* b. Applicant			
* c. State			
* d. Local			
* e. Other			
* f. Program Income			
* g. TOTAL	852,868.00		
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on			
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.			
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.			
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", provide explanation and attach:			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)			
<input checked="" type="checkbox"/> ** I AGREE			
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.			
Authorized Representative:			
Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Kelly"/>
Middle Name:		<input type="text"/>	
* Last Name:	<input type="text" value="Giralt"/>		
Suffix:	<input type="text"/>		
* Title:	<input type="text" value="Mayor"/>		
* Telephone Number:	<input type="text" value="706-613-3010"/>	Fax Number:	<input type="text"/>
* Email:	<input type="text" value="kelly.giralt@scgov.gov"/>		
* Signature of Authorized Representative:			
		* Date Signed:	

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1942 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-546) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11580 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§488a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
Unified Government Athens-Clarke County		5-10-2023	

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 1040-0009
Expiration Date: 02/28/2026

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. Those include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1685, and 1686-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd. 3 and 290 ee. 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-616) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§278a to 278a-7), the Copeland Act (40 U.S.C. §278c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11986; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470). EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§460a-1 et seq.).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7704) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
Unified Government Athens-Clarke County		5/17/2023	

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