



**ANNUAL ACTION PLAN  
HUD FISCAL YEAR 2018-2019**

**Community Development Block Grant (CDBG)  
HOME Investment Partnership (HOME)  
Emergency Solutions Grant (ESG)**

**Lee County Board of County Commissioners**  
Human and Veteran Services  
Cecil Pendergrass, Chair, Board of County Commissioners  
Roger Desjarlais, County Manager  
Christine Brady, Assistant County Manager  
Roger Mercado, Director, Human and Veteran Services  
Julie Boudreaux, Program Manager, Human and Veteran Services  
Jeannie Sutton, Grants Coordinator, Human and Veteran Services



## Executive Summary

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

#### 1. Introduction

The Program Year 2018 Annual Action Plan has been completed in compliance with Federal regulations and through consultation with stakeholders and program staff. A variety of projects have been identified throughout the plan, which are intended to assist in the provision of housing, community development, economic development, assistance for individuals and families experiencing homelessness, and neighborhood revitalization. These projects are being undertaken in accordance with the objectives, outcomes, and goals specified in Lee County's 2013-2018 Consolidated Plan.

In the event of a Presidentially-declared disaster, Lee County may designate funds from existing projects to address damages in the Presidentially-declared disaster area(s). Specific projects and activities to be undertaken will be determined based on immediate and long term recovery needs. Amendments made to the Annual Action Plan as a result of a Presidentially-declared disaster will be made in accordance with Lee County's Citizen Participation Plan (Administrative Code 15-2) or HUD provided guidance.

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

Goals include the provision of housing rehabilitation, down payment assistance, increased economic opportunities, homeless housing and services, development of CHDO and Non-CHDO housing, and revitalization of neighborhoods. These goals will be met through a number of projects, and subsequently, a number of activities within each project. The beneficiaries/outcomes are identified in the Goals and Projects sections, and include benefits to people, households, housing units, and businesses.

In the event of a Presidentially-declared disaster, Lee County may designate funds from existing projects to address damages in the Presidentially-declared disaster area(s). Specific projects and activities to be undertaken will be in accordance with the applicable regulation, and will be determined based on immediate and long-term recovery needs. Before making assistance available, Lee County will verify that the proposed activity will not be funded by FEMA or the SBA, and that advance payments from these or

other sources will not duplicate CPD assistance in accordance with Section 312 (42 U.S.C. 5155) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (42 U.S.C 5121 et seq.).

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

Staff and others consulted during the planning process evaluated past project outcomes. Through this consultation, it was determined that the continuation of the previous year's projects was necessary. In addition, staff and the public recommended that affordable housing development be a high priority in this plan. Projects such as HOME CHDO and Non-CHDO Housing Development and CDBG Non-profit Capital Improvement are being allocated additional funds in this plan to facilitate the development of additional affordable housing units.

Staff also identified slow spending for owner occupied rehabilitation and down payment assistance programs. Multiple explanations are available for this slow spending, including, but not limited to: improved economic conditions, rising home purchase prices, and increasing lending restrictions from private banks. Based on these evaluations, funding for HOME Down Payment Assistance is being reduced and no funding will be allocated for CDBG Owner Occupied Rehab in this plan. The CDBG Owner Occupied Rehab program will continue to operate using remaining program year 2016 and 2017 CDBG funds.

Additionally, due to long waiting lists at homeless service providers throughout the county, there is a need for additional staff to provide case management associated with the HOME Tenant Based Rental Assistance program. A separate CDBG Housing Services Delivery (14J) activity is being created to address this need.

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

Lee County encourages residents to participate in the development of the Annual Action Plan by providing two public hearings during Community Action Agency/Neighborhood District Committee (CAA/NDC) meetings throughout the year. The CAA/NDC serves as the advisory body to the Lee County BoCC and participates in planning, performance evaluation, and public comment on the Community Services Block Grant Action Plan, Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, and the Consolidated Annual Performance Evaluation Report (CAPER). The committee's comments, as well as comments from the public, were considered during the development of this plan. To encourage resident participation, Lee County publishes a draft version of the Plan on the Human and Veteran Services' website, which may be reviewed for 30 days.

Lee County also consults with various entities throughout the development of the plan, including other municipalities, the Continuum of Care, and the Public Housing Authority. Details on participation and consultation are contained here within.

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

Public input received during the January 18, 2018, public meeting included discussion regarding the basic needs gap for the local Haitian population, career development needs for youth up to age 24, senior housing needs, long housing waiting lists and lack of affordable housing stock, and economic development needs such as job training and small business development, youth homelessness, and fair housing.

Comments received at the March 8, 2018 public meeting included suggestions to develop additional affordable housing using a single-room occupancy model. Questions were also asked regarding the different funding sources available for CHDO's and Non-CHDO's.

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

All comments were accepted and considered in the planning process.

## **7. Summary**

Based on the comments received during the public participation process, additional funds are being allocated for CDBG Economic Development, CDBG Non-Profit Capital Improvement, and HOME Non-CHDO housing development activities.

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	LEE COUNTY	Human and Veteran Services
HOME Administrator	LEE COUNTY	Human and Veteran Services
ESG Administrator	LEE COUNTY	Human and Veteran Services

Table 1 – Responsible Agencies

### Consolidated Plan Public Contact Information

Jeannie Sutton, Grants Coordinator  
Lee County Human and Veteran Services  
2440 Thompson St  
Fort Myers, FL 33901  
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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

**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(I))**

Lee County enhances coordination between housing providers, health providers, mental health providers, and service agencies by periodically hosting community wide planning and consultation meetings. Additional coordination takes place through the Continuum of Care, which meets regularly to discuss community wide collaboration efforts to address homelessness and affordable housing. Lee County also directly participates with each of these contributing agencies to send and receive client referrals, address service gaps, and develop funding priorities.

**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.**

Lee County is the Lead Agency for the Continuum of Care, and has spearheaded the local effort to ensure compliance with the HEARTH Act provisions. There is continuous coordination between Lee County, the Lee County Homeless Coalition, and the Continuum as a whole, to address the needs of persons who are homeless or at risk of homelessness. This includes discharge planning, identifying needs and gaps in the community, evaluating system and project performance, establishing system-wide written standards, and researching project models and funding sources.

Lee County also lead the Zero:2016 initiative, and successfully achieved functional zero status for veteran homelessness in 2016. The County continues allocate more than \$1.3 million in HUD Continuum of Care funds to provide rapid re-housing assistance to families with children. Remaining Continuum of Care funds are allocated for Permanent Supportive Housing projects, which are prioritized for individuals who are chronically homeless. State Emergency Solutions Grants, Temporary Assistance for Needy Families - Prevention, and Challenge grants funds are used to provide homelessness prevention assistance for persons at risk of homelessness. Additionally, the Lee County Continuum of Care is currently working to complete a new strategic plan based on the goals and framework of the federal strategic plan, "Opening Doors".

**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**

As previously noted, Lee County is the Lead Agency for the Continuum of Care, and is in continuous consultation with the Continuum, including consulting on ESG Planning. Continuum members continue to support the current ESG program structure, in which Human and Veteran Services administers a portion of the ESG allocation to provide outreach and rapid re-housing assistance to eligible households and allocates remaining funds for shelter operations.

In 2017, the Continuum of Care Governing Board established new project performance targets and approved continuum-wide written standards. In January 2018, the Board also approved the Coordinated Entry policies and procedures in accordance with CPD Notice 17-01. ESG projects are monitored annually, and outcomes are included in system performance measures.

**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	<b>Agency/Group/Organization</b>	CITY OF BONITA SPRINGS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Needs other than housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was consulted through letter and email correspondence. Consultation was solicited on the goals, projects, and activities to be implemented with funds received for Urban County partnership.
2	<b>Agency/Group/Organization</b>	CITY OF SANIBEL
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was consulted through letter and email correspondence. Consultation was solicited on the goals, projects, and activities to be implemented with funds received for Urban County partnership.
3	<b>Agency/Group/Organization</b>	TOWN OF FORT MYERS BEACH
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town was consulted through letter and email correspondence. Consultation was solicited on the goals, projects, and activities to be implemented with funds received for Urban County partnership.
4	<b>Agency/Group/Organization</b>	Housing Authority of the City of Fort Myers
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The PHA was completed through email correspondence. Consultation was solicited on the goals, projects, and activities to be implemented by the PHA in the upcoming year, as well as to obtain status on existing projects and vacancy status.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

None.

**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	Lee County	Goals and objectives identified in the 10 Year Plan to End Homelessness are consistent with Annual Action Plan goals and objectives. Both aim to provide housing and services for individuals who are homeless.

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

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

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

Lee County encourages residents to participate in the development of the Annual Action Plan by conducting two public hearings throughout the year. Lee County also publishes a draft version of the Plan and posts it on the Human and Veteran Services' website. The public can review and comment on the draft for 30 days. Public notices are published in the New-Press (the local newspaper) and include statements about making reasonable accommodations for hearings and the format of the plan, and offering translations services. In an effort to broaden resident participation, notifications regarding the January 18, 2018 public meeting was also posted on the Lee County Human and Veteran services Facebook page, and distributed via email to many local service providers. These actions are designed to encourage further participation by all residents in Lee County. Affidavits of publication and minutes from the January 18, 2018 and March 8, 2018 public meetings are attached to this plan.

### **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	The public hearing was held during the Community Action Agency/Neighborhood District Committee (CAA/NDC) meeting on January 18, 2018. There were five residents, and eight committee members in attendance. The meeting was publicly noticed in the Fort Myers New-Press (affidavit is attached to this plan), and posted on the Human and Veteran Services Facebook page.	Public input received during the January 18, 2018, public meeting included discussion regarding the basic needs gap for the local Haitian population, career development needs for youth up to age 24, senior housing needs, long housing waiting lists and lack of affordable housing stock, economic development needs such as job training and small business development, youth homelessness, and fair housing.	All comments were accepted and considered.	<a href="https://www.facebook.com/Lee-County-Human-and-Veteran-Services-908647605936502/">https://www.facebook.com/Lee-County-Human-and-Veteran-Services-908647605936502/</a>

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 Hearing	Non-targeted/broad community	The public hearing was held during the Community Action Agency/Neighborhood District Committee meeting on March 8, 2018. There were five residents and ten committee members in attendance. The meeting was publicly noticed in the Fort Myers New-Press (affidavit is attached to this plan).	Comments received at the March 8, 2018 public meeting included suggestions to develop additional affordable housing using a single-room occupancy model. Questions were also asked regarding the different funding sources available for CHDO's and Non-CHDO's.	All comments were accepted and considered.	

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	Newspaper Ad	Non-targeted/broad community	The availability of the draft Annual Action Plan was publicly notice in the Fort Myers New-Press (affidavit is attached to this plan) for 30 days. The draft was made available on the Human and Veteran Services website from June 27, 2018 through July 27, 2018.	There were no comments received regarding the draft plan.	Not applicable.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### 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	3,008,725	50,000	0	3,058,725	3,028,725	

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	983,519	50,000	0	1,033,519	1,033,519	Program Income is estimated based an amount currently receipted plus the amount anticipated to be receipted prior to the end of the 2017 program year.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	238,555	0	0	238,555	238,555	

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: \$		
Continuum of Care	public - federal	Rapid re-housing (rental assistance) Rental Assistance Services	1,739,532	0	0	1,739,532	1,739,532	Lee County is the Collaborative Applicant for Continuum of Care. Legacy Shelter Plus Care and Supportive Housing Program (now Continuum of Care funds) will be utilized by Community Assisted & Supported Living to provide permanent supportive housing, and The Salvation Army to provide rapid re-housing in the community.
Other	public - federal	Admin and Planning Economic Development Financial Assistance Services	467,152	0	0	467,152	467,152	Community Services Block Grant funds are used for homeless prevention, re-housing programs and job training.

Table 5 - Expected Resources – Priority Table

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

Federal funds will leverage other funds by referring identified at-risk households or homeless households to appropriate programs for prevention or re-housing. Services provides are funded through County General funds, Continuum of Care programs, HOPWA and CSBG. Additionally, State SHIP funds are used to assist low income persons with down payment assistance, and provide match for HOME funded projects. ESG will be matched with County General funds, as well as other resources documented by sub-recipients. Some CDBG funds will be concentrated on neighborhood revitalization, and will be used in the targeted areas noted in the Consolidated Plan. These funds will be leveraged with private funds gathered by neighborhood organizations through fundraising.

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

There are no publicly owned lands or properties that are currently identified for projects in this 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	Housing Rehabilitated	2013	2017	Affordable Housing	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Affordable Housing	CDBG: \$200,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	Down Payment Assistance Provided	2013	2017	Affordable Housing	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Affordable Housing	HOME: \$142,373	Direct Financial Assistance to Homebuyers: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Revitalized Neighborhood Districts	2013	2017	Non-Housing Community Development	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Neighborhood Revitalization Public Improvements and Infrastructure	CDBG: \$1,240,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12420 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 12420 Persons Assisted Housing Code Enforcement/Foreclosed Property Care: 3243 Household Housing Unit
4	CHDO Housing Development	2013	2017	Affordable Housing	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Affordable Housing	HOME: \$150,000	Homeowner Housing Added: 1 Household Housing Unit
5	Increased Economic Opportunities	2013	2017	Non-Housing Community Development	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Economic Development	CDBG: \$770,734	Public service activities other than Low/Moderate Income Housing Benefit: 30 Persons Assisted Businesses assisted: 2 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Increased Homeless Housing and Services	2013	2017	Homeless	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Homeless Services Housing for the Homeless	CDBG: \$85,000 HOME: \$372,795 ESG: \$238,555	Public service activities for Low/Moderate Income Housing Benefit: 471 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 60 Households Assisted Homeless Person Overnight Shelter: 475 Persons Assisted
7	Non-CHDO Housing Development	2013	2017	Affordable Housing	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor	Affordable Housing	HOME: \$270,000	Rental units constructed: 1 Household Housing Unit Rental units rehabilitated: 1 Household Housing Unit

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Housing Rehabilitated
	<b>Goal Description</b>	In program years 2013 and 2014, housing rehabilitation was completed using CDBG and HOME funds. Beginning in program year 2015, only CDBG funds were used. During program year 2018, rehabilitations will continue to be completed in target areas, as well as non-target areas, of Lee County, but no 2018 funding will be budgeted. Remaining program year 2016 and 2017 CDBG funds will be used to continue the CDBG Owner Occupied Rehab program through the 2018 program year.
2	<b>Goal Name</b>	Down Payment Assistance Provided
	<b>Goal Description</b>	Down payment assistance will be provided to eligible homebuyers using HOME funds. Funds will be used in target areas as well as non-targeted areas of Lee County.
3	<b>Goal Name</b>	Revitalized Neighborhood Districts
	<b>Goal Description</b>	<div>This overall project will consist of concentrated code enforcement services, provision of public services, and improvements to public facilities in five low to moderate income neighborhoods of the County. The population totals in each low to moderate income area were taken from the 2010 US Census.</div>
4	<b>Goal Name</b>	CHDO Housing Development
	<b>Goal Description</b>	CHDO funds will be used by an eligible organization to provide affordable housing. Location has not been determined at the time of submission of the plan, but projects may be completed in target areas as well as non-targeted areas of Lee County.
5	<b>Goal Name</b>	Increased Economic Opportunities
	<b>Goal Description</b>	Increased economic opportunities will be made available through special economic development projects and/or nonprofit capital improvement projects in Lee County, and will be completed in target areas as well as non-targeted areas of Lee County.
6	<b>Goal Name</b>	Increased Homeless Housing and Services
	<b>Goal Description</b>	Projects to provide homeless housing and projects to provide homeless services will include CDBG, HOME, and ESG funds. Projects may be completed in target areas as well as non-targeted areas of Lee County.

<b>7</b>	<b>Goal Name</b>	Non-CHDO Housing Development
	<b>Goal Description</b>	Development of affordable housing using HOME and CDBG entitlement funds. Activities may include acquisition, rehabilitation, and/or new construction (HOME only) of affordable housing units in target areas as well as non-targeted areas of Lee County.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Lee County anticipates completing 19 projects in Program Year 2018-2019.

#### Projects

#	Project Name
1	CDBG Housing Delivery
2	CDBG Program Administration
3	CDBG Urban County Administration
4	CDBG Owner Occupied Housing Rehabilitation
5	CDBG Homeless Services
6	CDBG Fort Myers Beach Public Services
7	CDBG Bonita Springs Public Facilities
8	CDBG Sanibel Rental Rehabilitation
9	CDBG Neighborhood Infrastructure
10	CDBG Neighborhood Code Enforcement
11	CDBG Neighborhood Public Services
12	CDBG Economic Development
13	CDBG Non-Profit Capital Improvement
14	HOME Project Delivery
15	HOME Down Payment Assistance
16	HOME CHDO Project
17	HOME Non-CHDO Housing Development
18	HOME Tenant Based Rental Assistance
19	ESG Program

**Table 7 - Project Information**

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

Lee County determined the allocation for each project through the evaluation of past program performance, staff recommendations, and public input received during the citizen participation and consultation process.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated, and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required.

Additionally, public comments suggested a need for economic development activities such as job training or assistance to small businesses. Lee County intends to undertake an economic development activity to meet this need.

## **AP-38 Project Summary**

### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Housing Delivery
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Housing Rehabilitated
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	The project is in support of the owner occupied housing rehabilitation program.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Beneficiaries will be reported in the activities for the owner occupied housing rehabilitation program.
	<b>Location Description</b>	This project will be undertaken in association with the owner occupied housing rehabilitation program in target areas, as well as in unincorporated areas of Lee County.
	<b>Planned Activities</b>	This activity is in support of the owner occupied housing rehabilitation program.
<b>2</b>	<b>Project Name</b>	CDBG Program Administration
	<b>Goals Supported</b>	Housing Rehabilitated Revitalized Neighborhood Districts Down Payment Assistance Provided CHDO Housing Development Increased Economic Opportunities Increased Homeless Housing and Services Non-CHDO Housing Development
	<b>Needs Addressed</b>	Affordable Housing Neighborhood Revitalization Public Improvements and Infrastructure Economic Development Housing for the Homeless Homeless Services
	<b>Funding</b>	CDBG: \$300,000

	<b>Description</b>	This project is for the administration of the CDBG program.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is for the administration of the CDBG program, and does not result in beneficiaries.
	<b>Location Description</b>	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL.
	<b>Planned Activities</b>	This project will include activities for the administration of the CDBG program.
3	<b>Project Name</b>	CDBG Urban County Administration
	<b>Goals Supported</b>	Revitalized Neighborhood Districts Increased Economic Opportunities
	<b>Needs Addressed</b>	Neighborhood Revitalization Public Improvements and Infrastructure Economic Development
	<b>Funding</b>	CDBG: \$30,636
	<b>Description</b>	This project is for the administration of the Urban County program.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will not result in beneficiaries.
	<b>Location Description</b>	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL.
<b>Planned Activities</b>	This project will include activities for the administration of the Urban County program.	
4	<b>Project Name</b>	CDBG Owner Occupied Housing Rehabilitation
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Housing Rehabilitated

	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	\$0
	<b>Description</b>	Rehabilitation of owner occupied housing units in Lee County. Rehabilitations will continue to be completed in target areas, as well as non-target areas, of Lee County during program year 2018, but no 2018 funding will be budgeted. Remaining program year 2016 and 2017 CDBG funds will be used to continue the CDBG Owner Occupied Rehab program through the 2018 program year.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 20 low to moderate income families will benefit from the proposed activities.
	<b>Location Description</b>	This project will be undertaken in target areas, as well as other areas of unincorporated Lee County.
	<b>Planned Activities</b>	Rehabilitation of owner occupied housing units in Lee County.
5	<b>Project Name</b>	CDBG Homeless Services
	<b>Goals Supported</b>	Increased Homeless Housing and Services
	<b>Needs Addressed</b>	Housing for the Homeless Homeless Services
	<b>Funding</b>	CDBG: \$85,000
	<b>Description</b>	This project consists of public services and housing support for persons who are homeless in Lee County.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 471 persons will benefit from the public service activities within this project. An additional 60 persons will benefit from the housing services supported by this project.
	<b>Location Description</b>	The public service activities undertaken in this project will be carried out by the Lee County Homeless Coalition in Fort Myers, FL. The housing services undertaken in this project will be carried out by Lee County Human and Veteran Services in Fort Myers, FL.

	<b>Planned Activities</b>	This project consists of public services and housing services supporting persons who are homeless in Lee County. The public services portion of this project includes support for the Lee County Homeless Coalition. The housing services portions of this project includes support of the HOME program, as eligible in accordance with 570.201(k).
6	<b>Project Name</b>	CDBG Fort Myers Beach Public Services
	<b>Goals Supported</b>	Increased Economic Opportunities
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$24,668
	<b>Description</b>	This project will include the provision of public services to youth in Fort Myers Beach.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The town estimates 30 youth will benefit from the planned activities.
	<b>Location Description</b>	This project will be undertaken within the limits of the Town of Fort Myers Beach.
	<b>Planned Activities</b>	This project will include the provision of after school and summer camp programs for youth in Fort Myers Beach.
7	<b>Project Name</b>	CDBG Bonita Springs Public Facilities
	<b>Goals Supported</b>	Revitalized Neighborhood Districts
	<b>Needs Addressed</b>	Neighborhood Revitalization Public Improvements and Infrastructure
	<b>Funding</b>	CDBG: \$354,230
	<b>Description</b>	This project will involve construction or rehabilitation of public facilities in Bonita Springs.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The city estimates 1000 low to moderate income persons will benefit from the planned activities.
	<b>Location Description</b>	This project will be undertaken within low- to moderate-income areas within the city limits of Bonita Springs.

	<b>Planned Activities</b>	Activities for this project will include public facility and infrastructure improvements within the city limits of Bonita Springs.
<b>8</b>	<b>Project Name</b>	CDBG Sanibel Rental Rehabilitation
	<b>Goals Supported</b>	Housing Rehabilitated Revitalized Neighborhood Districts
	<b>Needs Addressed</b>	Affordable Housing Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$28,125
	<b>Description</b>	This project will consist of the rehabilitation of rental housing in Sanibel.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 5 housing units will benefit from the proposed activities.
	<b>Location Description</b>	The project will be undertaken within the city limits of the City of Sanibel.
	<b>Planned Activities</b>	Activities will consist of the rehabilitation of affordable rental units.
<b>9</b>	<b>Project Name</b>	CDBG Neighborhood Infrastructure
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Revitalized Neighborhood Districts
	<b>Needs Addressed</b>	Neighborhood Revitalization Public Improvements and Infrastructure
	<b>Funding</b>	CDBG: \$885,000
	<b>Description</b>	This project will consist of infrastructure improvements in low to moderate income areas of Lee County.
	<b>Target Date</b>	9/30/2019

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 12,420 persons will benefit from this project.
	<b>Location Description</b>	This project will be undertaken in targeted low to moderate income areas of Lee County.
	<b>Planned Activities</b>	This project will include infrastructure improvement in low to moderate income areas of Lee County.
<b>10</b>	<b>Project Name</b>	CDBG Neighborhood Code Enforcement
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Revitalized Neighborhood Districts
	<b>Needs Addressed</b>	Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$45,000
	<b>Description</b>	This project will consist of concentrated code enforcement in low to moderate income areas of Lee County.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 3242 housing units will be included.
	<b>Location Description</b>	This project will be undertaken in targeted low to moderate income areas of Lee County.
	<b>Planned Activities</b>	This project will consist of concentrated code enforcement in low to moderate income areas of Lee County.
<b>11</b>	<b>Project Name</b>	CDBG Neighborhood Public Services
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Revitalized Neighborhood Districts

	<b>Needs Addressed</b>	Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$310,000
	<b>Description</b>	This project will consist of the provision of public services in low to moderate income targeted areas.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 12,420 persons will benefit from this project.
	<b>Location Description</b>	This project will be undertaken within targeted low to moderate income areas of Lee County.
	<b>Planned Activities</b>	This project will consist of public services in low to moderate income targeted areas.
<b>12</b>	<b>Project Name</b>	CDBG Economic Development
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increased Economic Opportunities
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$96,066
	<b>Description</b>	This project will consist of economic development activities. Activities types and locations will be determined upon receipt of applications, but may be undertaken in target areas or other areas of unincorporated Lee County.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that this project will benefit one business.
	<b>Location Description</b>	Activities types and locations will be determined upon receipt of applications, but may be undertaken in target areas or other areas of unincorporated Lee County.
	<b>Planned Activities</b>	This project will consist of economic development activities. Activities types and locations will be determined upon receipt of applications, but may be undertaken in target areas or other areas of unincorporated Lee County

<b>13</b>	<b>Project Name</b>	CDBG Non-Profit Capital Improvement
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Housing Rehabilitated Increased Economic Opportunities Increased Homeless Housing and Services
	<b>Needs Addressed</b>	Affordable Housing Economic Development Housing for the Homeless Homeless Services
	<b>Funding</b>	CDBG: \$650,000
	<b>Description</b>	This project will consist of capital improvements for non-profit organizations that serve low to moderate income clientele and/or persons who are homeless. Improvements may include acquisition or rehabilitation of rental units or other service buildings owned by non-profit organizations.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that one rental unit will be rehabilitated and/or one business will be assisted. Beneficiaries will be determined upon receipt of applications.
	<b>Location Description</b>	This project will consist of capital improvements for non-profit organizations that serve low to moderate income clientele and/or persons who are homeless. Project location will be determined on receipt of applications, but may be undertaken in target areas or other areas of unincorporated Lee County.
	<b>Planned Activities</b>	This project will consist of capital improvements for non-profit organizations that serve low to moderate income clientele and/or persons who are homeless. Activities and beneficiaries will be determined upon receipt of applications.
<b>14</b>	<b>Project Name</b>	HOME Project Delivery
	<b>Target Area</b>	

	<b>Goals Supported</b>	Down Payment Assistance Provided CHDO Housing Development Increased Homeless Housing and Services Non-CHDO Housing Development
	<b>Needs Addressed</b>	Affordable Housing Housing for the Homeless Homeless Services
	<b>Funding</b>	HOME: \$98,351
	<b>Description</b>	This project supports the administration of the HOME program.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project does not result in beneficiaries.
	<b>Location Description</b>	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL
	<b>Planned Activities</b>	Administration of the HOME program.
<b>15</b>	<b>Project Name</b>	HOME Down Payment Assistance
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Down Payment Assistance Provided
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$142,373
	<b>Description</b>	This project includes the provision of down payment assistance to eligible home buyers in Lee County.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated 10 low- to moderate-income household will benefit from the proposed activities.
	<b>Location Description</b>	This project will be undertaken in all areas of Lee County.

	<b>Planned Activities</b>	Provision of down payment assistance to eligible homebuyers in Lee County.
<b>16</b>	<b>Project Name</b>	HOME CHDO Project
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	CHDO Housing Development
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$150,000
	<b>Description</b>	This project will consist of CHDO acquisition and rehabilitation or new construction of housing units.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is estimated to result in the acquisition and rehabilitation, or construction of one housing unit to benefit one eligible household.
	<b>Location Description</b>	The location of this project will be determined by the CHDO, and may be completed in target areas as well as non-targeted areas of Lee County.
	<b>Planned Activities</b>	This project will consist of CHDO acquisition and rehabilitation, or construction of one housing unit.
<b>17</b>	<b>Project Name</b>	HOME Non-CHDO Housing Development
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Non-CHDO Housing Development
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$270,000
	<b>Description</b>	This project will consisted of the development of affordable housing through acquisition or new construction.

	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that at least two affordable housing units will be developed from this project.
	<b>Location Description</b>	The specific location for this project has not yet been determined, but the project may be indentified in targeted, as well as, non-targeted areas of Lee County.
	<b>Planned Activities</b>	This project will consisted of the development of affordable housing through acquisition or new construction.
<b>18</b>	<b>Project Name</b>	HOME Tenant Based Rental Assistance
	<b>Target Area</b>	Charleston Park Suncoast Estates Page Park Palmona Park Pine Manor
	<b>Goals Supported</b>	Increased Homeless Housing and Services
	<b>Needs Addressed</b>	Housing for the Homeless
	<b>Funding</b>	HOME: \$372,795
	<b>Description</b>	This project consists of using HOME funds for a tenant based rental assistance program for household who are homeless.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 29 households will be renewed for a second 12 month lease term and an additional 40 new households will benefit from this activity.
	<b>Location Description</b>	This project will be administered by the Lee County Human and Veteran Services, located in Fort Myers, Florida. Assistance will be provided throughout the county.
	<b>Planned Activities</b>	This project consists of using HOME funds for a tenant based rental assistance program for households who are homeless. Eligible costs will include security and utility deposits as well as rental assistance. Clients will also receive case management.
<b>19</b>	<b>Project Name</b>	ESG Program
	<b>Target Area</b>	

<b>Goals Supported</b>	Increased Homeless Housing and Services
<b>Needs Addressed</b>	Housing for the Homeless Homeless Services
<b>Funding</b>	ESG: \$238,555
<b>Description</b>	Project will consist of the program administration, rapid re-housing, outreach, and shelter activities at the Bob Janes Triage Center and Low Demand Shelter.
<b>Target Date</b>	9/30/2019
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 20 households will benefit from rapid re-housing and 475 will benefit from shelter activities.
<b>Location Description</b>	The project will take place at the Lee County Human and Veteran Services, located in Fort Myers, Florida, as well as at the Bob Janes Triage Center and Low Demand Shelter, also located in Fort Myers, Florida.
<b>Planned Activities</b>	Project will consist of the program administration, rapid re-housing, outreach, and shelter activities at the Bob Janes Triage Center and Low Demand Shelter.

## **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**

CDBG funds will be used in unincorporated Lee County, the City of Bonita Springs, the City of Sanibel, and the Town of Fort Myers Beach. Some CDBG funds will be concentrated on neighborhood revitalization, and therefore, will be used in the targeted areas noted in the Consolidated Plan. HOME and ESG funds will be used countywide. Maps indicating the low income and minority, including Hispanic, concentrations are attached to this plan.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Charleston Park	
Suncoast Estates	
Page Park	
Palmona Park	
Pine Manor	

**Table 8 - Geographic Distribution**

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

In order to provide assistance to as many residents as possible, the County dedicates only a portion of the funds to specific areas. These designations are based on the partner municipalities' urban county agreement requirements in the case of Bonita Springs, Sanibel, and Fort Myers Beach. In other locations, funds are allocated to areas meeting the low to moderate income designations as issued by HUD. Those areas have been designated by the County as target areas, and each has a revitalization plan that is used for project planning purposes.

### **Discussion**

## Affordable Housing

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

#### Introduction

Affordable housing will be provided through CDBG and HOME assistance. Additional funding sources for affordable housing will include NSP and State Housing Initiative Partnership (SHIP) funding (state funding). NSP program income funds will be used to purchase, rehabilitate, and sell foreclosed properties to income eligible homebuyers. SHIP funds will be used to provide down payment assistance for qualified buyers. Lee County will also continue to search for additional resources available for the development of affordable housing units.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	89
Non-Homeless	38
Special-Needs	0
Total	127

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	89
The Production of New Units	2
Rehab of Existing Units	23
Acquisition of Existing Units	13
Total	127

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

An estimated 20 homeless households will be assisted with the ESG rapid re-housing program, 40 new and 29 renewal homeless households will be assisted with the Tenant Based Rental Assistance program. Additionally, an estimated 20 owner occupied housing rehabilitations will be completed using CDBG, and 3 will be completed using NSP funds. Approximately 2 new units will be acquired and rehabilitated, or constructed through CDBG and/or HOME funds. Down Payment Assistance will be provided for approximately 10 acquisitions using HOME funds and 3 using SHIP funds.

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

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

Due to a lack of affordable housing options, there is a great demand for public housing units and housing choice vouchers. This has resulted in a significant waiting list for both types of housing, which is regularly closed. The Public Housing waitlists opens one (1) time per year for a two (2) week period. During this two (2) week period it is likely that over 2000 names will be placed on the waitlists. Waitlists are monitored throughout the year to ensure they are opened as often as needed.

The Housing Authority of the City of Fort Myers' (HACFM) affiliate, Southwest Florida Affordable Housing Choice Foundation, SWFLAHCF, Inc. will be converting its 82 NSP units to Project Based Voucher units. This will allow a larger clientele base creating more housing opportunities to not only the Very Low Income clients but also to the Extremely Low Income clients whose income falls at or below 30% of the AMI.

HACFM added an additional 72 units to its inventory stock at The Homes at Renaissance Preserve which completes the projects development.

HACFM continues to promote a safe living environment for all residents. HACFM continues to partner and works with the local police department to add enhanced security at all properties. HACFM will add several security enhancements to Southward Village, a public housing development with 200 units. Such enhancements include but are not limited to added security lighting, high definition cameras, road closures to create a one way in and one way out of the development and the installation of a guard rail on the outer perimeter of the development. HACFM and Fort Myers Police Department (FMPD) are working to open a Police Substation at Southward Village, The Landings at East Pointe, and The Homes at Renaissance Preserve.

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

The Housing Authority of the City of Fort Myers (HACFM) continues to promote current Housing Choice Voucher (HCV) participants to join the HCV Family Self Sufficiency (FSS) program and Homeownership program. The FSS program was designed to connect families receiving subsidized housing assistance with access to community services and resources such as employment training, job-readiness, homeownership education, etc. necessary to advance families toward self-sufficiency. HACFM also continues to offer a Community Supportive Services (CSS) program for relocated residents of the revitalized Michigan Court, Renaissance Preserve and Horizons communities. The purpose of the CSS program is to provide support services such as job-skills training, childcare, transportation, and adult/youth education programs. Support services are vital in transitioning families into self-sufficiency.

HACFM continues to grow its number of HCV Homeownership Vouchers. HACFM continues to encourage interested residents to participate in the HCV FSS program offered at HACFM.

HACFM continues to offer strategies to encourage homeownership, as well as financial literacy and

budget classes to all HCV clients. HACFM continues to believe that families with more education and control over money will be able to provide more for themselves, while potentially moving toward homeownership. As a HUD certified housing counseling agency, HACFM provides an array of housing counseling services for public housing and Section 8 residents. Counseling services include but not limited to: Home Buyer Education classes, debt reductions, budgeting, credit restoration, mortgage qualifications, foreclosure prevention, pre & post purchase counseling, in addition to assistance to renters. HACFM has a certified Senior Credit Counselor on staff to assist tenants with getting their credit repaired to be eligible for homeownership.

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

HACFM is not designated as troubled.

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

**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**

Much of the outreach to homeless persons is conducted at community events such as the Point in Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, the Lee County Homeless Coalition, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services are more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human and Veteran Services recently implemented an ESG funded street outreach program that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

There are also specific events held throughout the year to raise awareness and promote outreach to persons who are homeless. Such events include the annual Candlelight Vigil, Homeless Challenge, and Community Conversations. In addition, the Lee County Homeless Coalition and Lee County Continuum of Care work together to facilitate ongoing community engagement through one-on-one meetings with elected officials and other community leaders.

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

The provision of emergency shelter, funded by the Emergency Solutions Grant, at the Bob Janes Triage Center and Low Demand Shelter helps to address some of the needs of individuals who are homeless. The HOME Tenant Based Rental Assistance program also supports the housing needs of individuals and families who are homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter and transitional housing needs may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

**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 plan's goals of providing homeless housing and services will help to prevent homelessness, re-house, or otherwise permanently house persons who are homeless. The Lee County Continuum of Care has established written standards for prioritization to ensure that persons with especially high needs are linked with adequate housing and supportive services. Additionally, the implementation of the coordinated entry process ensures that persons who are homeless are rapidly linked with appropriate housing resources and support. Ongoing collaboration between service providers and the Continuum of Care, and frequent reviews of HMIS data facilitate the implementation of strategies to reduce the length of time a person experiences homelessness.

These goals will be supported through the use of ESG funding which is used to engage and rapidly re-house persons who are homeless, and to support the Bob Janes Triage Center. Other than the funds available through this process, permanent housing needs may be addressed through other resources identified elsewhere in this plan, and through other grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

**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.**

Human and Veteran Services and other local agencies provide many programs and services aimed at preventing homelessness and stabilizing clients. These programs include job training, job readiness, financial management courses, and active case management. Several homelessness prevention programs, active throughout the County, provide assistance with rent and utilities to ensure that persons who are extremely low-income do not become homeless. These programs have streamlined the application, assistance, and referral process for persons who are homeless by participating in the coordinated entry process implemented by the Continuum of Care.

In addition, discharge planning agreements are in place with the local foster care agency, mental health and substance abuse provider, jail, and hospital. These agencies refer clients to appropriate service and housing providers to ensure that they are not discharged into homelessness.

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

**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**

At this time, there are no identified public policies that create barriers to affordable housing. Lee County recently implemented affordable housing incentives as part of the 2017-2020 Local Housing Assistance Plan in an effort to encourage the development of additional affordable housing. Lee County continues to invest NSP program income to create additional affordable housing through the rehabilitation and sale of foreclosed homes to eligible homebuyers.

In addition, quarterly reports are collected from regional partners to evaluate the actions taken toward addressing barriers to fair housing, as noted in the Analysis of Impediments. Actions taken toward eliminating these barriers will include providing accessibility and modifications in housing units. Lee County will also be collaborating with other local governments and the public housing authorities to update the Analysis of Impediments to Fair Housing Choice.

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

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

Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as substandard housing conditions, public services, infrastructure, economic development, and non-profit capital improvements. Projects and activities such as these are not anticipated to encounter obstacles during completion.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated, and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required.

Additionally, public comments suggested a need for economic development activities such as job training or assistance to small businesses. Lee County intends to undertake an economic development activity to meet this need.

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

Actions planned include using CDBG, HOME, and state funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant based rental assistance and CHDO and Non-CHDO housing development to facilitate the development of additional affordable housing units. Lee County has implemented the HOPWA Tenant Based Rental Assistance Program (TBRA), which is projected to house about 10-15 of the most vulnerable HIV/AIDS households. Partnerships with the Public Housing Authorities and other local housing providers will provide additional resources to foster and maintain affordable housing through new construction, rehabilitation, and referral to currently available units.

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

Homes built prior to 1978 where painted surfaces will be disturbed will be inspected for lead based paint. If lead is detected during the inspection, an assessment will be completed, followed by abatement.

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

There are many antipoverty programs implemented by numerous agencies in Lee County. Antipoverty impacts are inherent in the county's programs in housing, neighborhood development and elimination of homelessness. The goal of Lee County's antipoverty strategies is to help individuals and families rise above the poverty level, become self-sufficient, and eliminate systemic barriers to success. To achieve this goal, Lee County, in conjunction with city, state, regional and federal agencies, and with non-profit

agencies and private organizations, has coordinated, designed and implemented strategies and programs to overcome barriers to success.

Lee County Human and Veteran Services supports anti-poverty programs of non-profit social service agencies with county general funds through the Partnering for Results Program. Lee County has budgeted \$3,600,000 to support programs, which provide a variety of anti-poverty services in the following categories: Activities for Children & Youth, Supportive Living and Emergency Assistance. All programs address issues to assist in reducing poverty and assisting low/moderate income households. In FYE 9/30/17, 39 programs were funded within 27 agencies in the following categories: 20 programs under the Activities for Children & Youth category; 15 under the Supportive Living category and 4 under Emergency Assistance.

Human and Veteran Services provides anti-poverty action in its neighborhood building program area by working with the neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Self-Sufficiency program area consist of homeless programs, emergency assistance (rental, mortgage and utility payments), housing and financial counseling, case management, and educational services. Such programs include a financial literacy education program for families participating in homeless prevention and rehousing programs, and a soft skills employment training program. Educational services are funded by the Community Services Block Grant, and aim to increase self-sufficiency and upward job mobility for low-income households. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs and long term self-sufficiency. Additional antipoverty efforts include funding state mandated programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Drug and Veteran's Mental Health Courts.

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

Institutional structure is not deemed lacking. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation. Continued coordination will help to ensure an effective institutional structure.

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

Lee County works to bring together different groups and agencies, including private housing and social service agencies, when appropriate for both specific projects and for overall planning. In addition, the county works with local housing agencies to leverage resources to meet housing, infrastructure, and other service needs throughout the County. Human and Veteran Services is currently partnering with the Public Housing Authorities and local service providers to apply for HUD Mainstream Vouchers, which

will facilitate enhanced collaboration among service providers.

Lee County, the Housing Authority of the City of Fort Myers, Veterans Affairs, and the Lee County Homeless Coalition also participated in the Zero: 2016 initiative, which effectively ended Veteran homelessness in Lee County. As the lead agency for the Continuum of Care, Human and Veteran Services continues to work with these and other agencies to coordinate the delivery of housing and services for persons who are homeless.

## Program Specific Requirements

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

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	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
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	99.00%

**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:

Not applicable

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:

Lee County has elected to use Recapture as the primary method of ensuring affordability for low-to-moderate income homebuyers; however, resale provisions will be used when HOME funds are provided directly to a developer to reduce the development costs thereby making the price of the home affordable to the buyer. Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County. The full version of the Lee County Resale and Recapture Policy is available at Human and Veteran Services.

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:

Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County, expanding the number of affordable housing units. Depending on the circumstances of recapture, the affordability of the units may be waived (such as the case in a foreclosure). In the case of resale, the unit will be resold to an eligible buyer, preserving affordability. The full version of the Lee County Resale and Recapture Policy is available at the Human and Veteran Services.

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:

Not applicable.

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

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

The existing Lee County Policy and Procedure manual and CoC Written Standards and Coordinated Entry Policies will be used to outline standards for the ESG rapid re-housing project. CoC Written Standards and Coordinated Entry Policies are attached to this plan.

In general, eligibility will be determined prior to providing assistance. Applicants must have incomes at or below 50% of the area median income. Households must meet the HUD's definition of homelessness under Category 1, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re-housing eligibility requirements, households are then prioritized by Lee County's target populations.

Income inclusions, income exclusions, and documentation standards can be found in the referenced manual. Verification and documentation of eligibility will be maintained in participant case files. Provided the requirements of each individual self-sufficiency plan are met, eligible households can receive 50 percent rent subsidies for six months. Exceptions may be made to the duration of assistance after management review and approval.

For the shelter operations component of ESG, standards for assistance will be detailed in the subrecipient provider contract and will stipulate eligible expenditures, beneficiary reporting requirements, and other procedural components of the program.

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

The Coordinated Entry System has three goals:

- 1) to help people move through the homeless service system faster,
- 2) reduce new entries into homelessness through prevention and diversion resources, and
- 3) improve data collection and quality to provide accurate information on what assistance consumers need.

The Lee County Continuum of Care (CoC) has developed a coordinated entry system, which uses the existing HMIS system. The process includes the use of a standardized assessment for all individuals, as well a coordinated referral and housing placement processes to ensure that people experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs. In addition, monthly meetings are held to ensure especially high risk clients are linked with the appropriate services. Quarterly planning workshops with outreach workers and

service providers are also held to obtain input on the design and help to secure buy-in for the system. Training for local agencies continues to be provided on an on-going basis as needed. The CoC Governing Board has reviewed and updated the Coordinated Entry Policies and Procedures in accordance with CPD Notice 17-01.

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

Lee County has determined the programs to receive assistance and their allocations based on comments received by the public and in consultations during the planning process, as well as staff review of program success to date. A portion of the ESG allocation is provided to SalusCare Inc., the community mental health and substance abuse service provider, to carry out shelter activities at the Bob Janes Triage Center and Low Demand Shelter.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

This requirement has been met.

5. Describe performance standards for evaluating ESG.

Overall evaluation of the ESG program will be undertaken by the Continuum of Care Governing Board. The Governing Board has established the following performance targets for all CoC and ESG funded projects:

1. 65% of persons in ES,SH, TH, or PH-RRH should be exited to permanent housing destinations
2. 45% of persons in CoC and ESG funded programs should maintain OR increase their income
3. No more than 35% of persons who were exited from CoC and ESG funded programs should return to homelessness within 1 year

Performance standards may be evaluated on a project-by-project basis and do not apply to the ESG funded shelter project. At minimum, Lee County expects to assist 20 households with re-housing, and the Triage Center and Low Demand Shelter has a 58 bed capacity, which is expected to have consistent beneficiary occupancy. Success of these programs will be measured by examining the beneficiaries served and system performance measures.

## Attachments

## Citizen Participation Comments

**LEE COUNTY  
COMMUNITY ACTION AGENCY  
AND  
NEIGHBORHOOD DISTRICT COMMITTEE  
REGULAR MEETING MINUTES  
January 18, 2018**

**Members Present:** Anne Gomez  
Rebecca Hines  
Kari Lefort  
Deb Reardon  
Frederick Richards  
George Saud  
Richard Sapp  
Keesha Wick

**Others Present:** Ronald Nelson  
Max Pierre  
Regina Touchstone  
Dianna Druding  
Chris Dowaliby

**Members Excused:** Lee Coleman  
Aimee McLaughlin

**Members Unexcused:** Ian Connell  
John Derrig  
Charles Garretson  
Melvin Lawson

**Staff Present:** Julie Boudreaux  
Kim Hustad  
Jeannie Sutton

### ITEM

#### 1. Call To Order/Establish Quorum

The meeting was called to order at 5:38 p.m. Ms. Gomez welcomed the members. Quorum present.

#### A. Members Present

##### 1. Members Absent/With Excuse

Ms. Aimee McLaughlin and Mr. Lee Coleman are absent with an excuse.

##### 2. Members Absent/Without Excuse

Mr. Ian Connell, Mr. John Derrig, Mr. Charles Garretson and Mr. Melvin Lawson are absent without an excuse.

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Page 1 of 5

**B. Approval of November 16, 2017 Minutes**

Ms. Gomez requested a motion to approve the minutes from the November 16, 2017 meeting.

**ACTION:**

Mr. George Sudd made a motion to approve the November 16, 2017 minutes and Mr. Richard Sapp seconded the motion, which passed unanimously.

**II. Public Comment**

No public comment made.

**III. Reports**

**A. Program Reports**

**1. IRMA – Recovery Report – Kim Hustad**

Ms. Hustad stated the Department of Human and Veteran Services hired a Long Term Recovery Case Manager. She mentioned the process is challenging. A decision was made to utilize the HMIS database to track all clients seeking long term recovery. It is important to track duplication of funding. The Federal Emergency Management Agency (FEMA) is behind in sending case managers to assist. Ms. Deborah Reardon inquired about the HMIS system. Ms. Hustad stated a Memorandum of Understanding must be signed by the interested agency and training is involved. Ms. Reardon stated there is a lack of shared information in the community. Ms. Boudreaux stated they could provide her with more information on HMIS.

**2. Assessment of Fair Housing – Jeannie Sutton**

Ms. Sutton stated The Department of Housing and Urban Development postponed the submission of any assessments until after 2020. For Lee County, this means the assessment will not be due until 2024. All meetings which were scheduled have been cancelled.

**B. Neighborhood Reports**

**1. Charleston Park – Julie Boudreaux**

Ms. Boudreaux stated the resident coordinator for Charleston Park is working diligently to bring back services to this community. Blanket and Blessings is assisting with reverse osmosis systems on some of the homes. The Lee County Health Department is testing wells. Some of the systems are not sanitized or have cracks.

**2. Page Park – Julie Boudreaux**

As of the December 2017, Page Park does not have a resident coordinator. A request for proposal was sent out without success. The neighborhood is wrapping up a water utility project.

**3. Palmona Park – George Sand**

Mr. George Sand wanted to thank everyone for the funding for the sidewalks. Some of the homes and empty lots continue to be of concern. Mr. Sand has called the fire department and they do not have jurisdiction over privately owned lots. Mr. Sand stated this maybe an issue to discuss with the commissioner. He stated they are changing their management format to an advisory board rather than a corporation. They are donating \$335.00 to CCMI as they close the corporation.

**4. Pine Manor – Anne Gomez**

Ms. Gomez reported the Harry Chapin Hunger Walk takes place on Saturday, January 20, 2018 at 8:30 at Miramar Outlets. An Easter egg hunt takes place on March 24, 2018 at Hunter Park from 10:00 a.m. to 12:00 p.m. Florida Gulf Coast continues with community service hours. The sewing club currently has 5 students learning how to hand sew and use a sewing machine. Teen Hope has 10 teens ages 11-18 attending regularly. The Children's Advocacy Center after school program has 30 children attending. Applications for ACCESS and Joblinks continues daily. The food bank is once a month. Healthy eating classes are also on a monthly basis. During the last quarter, the Children's Advocacy Center hosted their Thanksgiving Dinner with 300 people in attendance. Special guests included Heather Fitzengagen, Lizbeth Benequisto and Gregory Adkins. During Thanksgiving 75 turkeys and 200 gift cards were distributed. Over 200 children received Christmas presents and 250 people attended the Christmas dinner.

**5. Suncoast Estates – Julie Boudreaux**

Ms. Boudreaux reported there is not a resident coordinator in this neighborhood. They are looking to partner with a nonprofit to assist in the neighborhood. She stated all then neighborhood did a great job during the holidays. Ms. Rebecca Hines, Destiny Adult Diapers reported they are coordinating with Suncoast to provide services. She would like to coordinate with different communities.

**IV. New Business**

**A. \*Fiscal Year 2017 Organizational Assessment – Kim Hustad**

Ms. Hustad mentioned the organizational standards and assessments are required by federal regulation. The Federal Government wants a comprehensive Community Needs Assessment to development a strategic plan. The work plan would be developed from the information gathered from those plans to spend Community Services Block Grant (C.S.B.G.) dollars. The Community Action Plan for this year indicated the strengths included involvement from residents from Low Income Neighborhoods, and the delivery structure for the programs. The department has great collaboration with other agencies. The other strength is the policies and procedures. The challenges this year is the mission statement, which needs updating and a strategic plan needs to be developed. This allows for opportunities for new and creative things. Staff met and discussed combining efforts with the completion of other plans in the department. This is an extensive process. The director agreed to hire a consultant.

**ACTION:**

Mr. Frederick Richards made a motion to approve the Fiscal Year 2017 Organizational Assessment and Ms. Deborah Reardon seconded the motion, which passed unanimously.

**B. \*Community Services Block Grant (C.S.B.G) Work Plan -- Kim Hustad**

Ms. Hustad stated the Community Service Block Grant Work Plan would need to be tabled at this time.

**ACTION:**

Item tabled.

At this time, Ms. Gomez closed the CAA/NDC meeting and opened the Public Hearing.

**V. First Public Hearing U.S. Department of Housing and Urban Development (HUD) Annual Action Plan for (HUD) Fiscal Year 2018-2019 -- Jeannie Sutton**

Ms. Jeannie Sutton reviewed the eligible activities for each of the funding sources included in the plan. The Community Development Block Grants funds are used for community development needs; e.g. public facilities, housing, rehab to homes, economic development and code enforcement. HOME Funds are focused on affordable housing needs. This could include new construction, acquisition and rehab of housing units as well as tenant based rental assistance. The Emergency Solutions Grant is strictly for homeless services. The funding can be utilized for street outreach, shelter renovations, shelter operations and rapid rehousing. Currently it is utilized for shelter operations and rapid rehousing. This year they will also utilize the funding for street outreach. The Consolidated Plan is a five year plan to determine how to spend the money.

Mr. Max Pierre, Lee County Refugee discussed the struggles of the Haitian community. He is looking for funding for these individuals to assist with clothing, housing, food, etc. Ms. Sutton stated she could discuss with him the request for proposal process.

The Annual Action Plan is created each year to specify how funds will be spent for that year. A requirement of the Annual Plan process is to obtain public comment. Ms. Sutton reviewed the 2017 CDBG, HOME and ESG Projects and Budget for 2018 Consideration.

Ms. Deborah Reardon stated the out of school youth up to age 24 is a challenge for career development. She also mentioned affordable housing is an issue. Ms. Hines discussed seniors residing in facilities and their rent increased. Some seniors have no family. She is concerned for these individuals. Ms. Keesha Wick stated to contact United Way 211 or the Area Agency on Agency for referrals. Discussion took place regarding the wait list for low income housing and affordable housing. Mr. Frederick Richards mentioned economic development, job training and business development are also important. Mr. Kari Lefort stated there is concern regarding youth. Discussed youth homelessness, but there is a limited population of youth who are homeless.

Ms. Sutton said fair housing is primarily housing discrimination for minorities, persons with disabilities and discrimination based on sex, religion, race, color and ethnicity, etc. Affordable housing is based on whether you can afford the rent and if the rent is within 30% of the total monthly income. Ms. Sutton invited attendees to provide additional comments by e-mail, and visit the department website to review draft plans and provide comments.

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Page 4 of 5

**ACTION:**

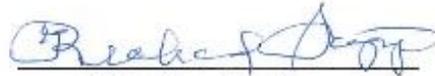
At this time, Ms. Gomez closed the Public Hearing and reconvened the CAA/NDC meeting.

**VI. Adjournment**

Meeting adjourned.



Lee Coleman, Chairman



Richard Sapp, Secretary

- C: Lee County Board of County Commissioners, District #1, #2, #3, #4, and #5  
Christine Brady, Assistant County Manager  
Roger Mercado, Director, Human & Veteran Services  
Ashley Fesperman, Assistant County Attorney  
Dorothea Austin, Department of Economic Opportunity

LEE COUNTY  
COMMUNITY ACTION AGENCY  
AND  
NEIGHBORHOOD DISTRICT COMMITTEE  
REGULAR MEETING MINUTES  
March 8, 2018

Members Present: Lee Coleman  
Ian Connell  
Charles Garretson  
Rebecca Hines  
Aimee McLaughlin  
Deb Reardon  
Frederick Richards  
George Sand  
Richard Sapp  
Keesha Wick

Others Present: Ronald Nelson  
Rasheka Fuller  
Tanya Sohlt  
Allarius Russ  
Joseph Redmon

Members Excused: Anne Gomez  
Melvin Lawson  
Kari Lefort

Members Unexcused: None

Staff Present: Julie Boudreaux  
Kim Hustad  
Jeannie Sutton

**ITEM**

**I. Call To Order/Establish Quorum**

The meeting was called to order at 5:34 p.m. Mr. Coleman welcomed the members. Quorum present.

**A. Members Present**

**1. Members Absent/With Excuse**

Ms. Anne Gomez, Mr. Melvin Lawson and Ms. Kari Lefort are absent with an excuse.

**2. Members Absent/Without Excuse**

None.

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Page 1 of 5

B. Approval of March 8, 2018 Minutes

Mr. Coleman requested a motion to approve the minutes from the January 18, 2018 meeting.

ACTION:

Ms. Rebecca Hines made a motion to approve the January 18, 2018 minutes and Ms. Deb Reardon seconded the motion, which passed unanimously.

II. Public Comment

No public comment made.

III. Reports

A. Program Reports

1. IRMA – Recovery Report – Kim Hustad

Ms. Hustad stated the Department of Human and Veteran Services reported Sunday, March 11, 2018 is the final day for temporary shelter for Hurricane IRMA victims. This would impact 45 households. Of the 45, 6 are currently working with the Long Term Recovery case manager, 2 are closed, 8 found housing, 11 were unable to be reached and 18 are on the wait list. There are 132 listed with FEMA. She mentioned the Department of Human and Veteran Services was approved to be a recipient of the list in which FEMA holds. There are another 132 on the list, which 68 are on the Human and Veteran Services list and another 64 were unable to be reached. The list helps tremendously for our department to plan for utilization of funding for the victims. One case manager is on board. They are anticipating hiring a case manager trainee. The United Way of Broward County applied for disaster case management. This is based on how many individuals applied for FEMA. This is a regional application for Broward, Collier and Lee Counties. This region was award 5 million for case management. Lee County will receive 1.5 million. Ms. Hustad discussed different scenarios of Hurricane Irma and the struggles they are facing. The case managers are there to assist with referrals to appropriate agencies. Construction managers will be hired to access the household, develop a scope of work, get the contractors to do the estimates and determine if they received FEMA and insurance funding. If there should be an unmet need, then the committee will determine whether it is an eligible expense. The partnership with United Way has been amazing. Ms. Rebecca Hines asked does this apply to hurricane victims only. Ms. Keesha Wick stated if there are victims from Hurricane Maria; please contact United Way at 211. Ms. Hustad mentioned the biggest challenge is affordable housing.

2. Homeless Services – Kim Hustad

Ms. Hustad reported there are 8 families utilizing Community Services Block Grant funds, 17 using county funds, 8 using Emergency Shelter Grant funds and 29 using Tenant Based Rental Assistance funds. There are another 40 seeking housing. This averages around 30 to 35 per case manager. There are 35 on a wait list. A new case manager will come on board working with TRBA funds. In 2016, staff interviewed 336 homeless households and housed 122. In 2017, they interviewed 356 and housed 140. For 2018, they interviewed 15 and housed 8, which is due to the wait list.

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Page 2 of 5

Since October 1, 2017 approximately \$300,000 was spent to house individuals.

## B. Neighborhood Reports

### 1. Charleston Park – Allarius Russ

Mr. Ross mentioned Charleston Park Day takes place on April 28, 2018 at 10:00 a.m. T-shirt sales begin in March. They currently have a teen outreach program with 20 kids attending, which is held at the community center. The Dr. Ella Piper Senior computer skills class averages 5 participants. A senior breakfast is held twice a month with 20 seniors in attendance. Family nutrition classes have approximately 20 participants. Food pantry is every 4<sup>th</sup> Thursday of the month serving 150 families. Basic learning skills tutoring began in February. Tutoring is every Monday and Wednesday for elementary, middle and high school students. There are an average of 17 students attending. The Charleston Park Neighborhood Association meeting is every 2<sup>nd</sup> Monday of the month. There are 15 board members. Coming up in July will be the summer feed program. The community garden is growing with collard greens and tomatoes. The children will start their own garden soon.

### 2. Page Park – Lee Coleman

Mr. Coleman reported January and February they wrote grants for funding. They received \$1,000.00 from the fire department. They have 4 other grants out for requests for funds. On Tuesday and Thursdays, sweets and produce are distributed. The food bank is on the 1<sup>st</sup> and last Wednesdays of the month. Approximately 140 to 150 families served. Mr. Coleman thanked all the sponsors personally for their support to Page Park. Easter is March 31, 2018 and they expect are 100 children. The spaghetti dinner is April 18, 2018. In May they will look for donations for book bags then begin the feed program for the summer. He is looking to obtain a pavilion at Lakes Park to have a party for the kids once they get out of school.

### 3. Palmona Park – George Sand

Mr. George Sand mentioned the North Fort Myers Fire department installed 5 new hydrants and repaired others. He mentioned they contacted the property owners of who own vacant lots and now they can proceed to remove downed trees. They are planning a community yard center. He mentioned there is plenty of open land in Palmona Park. He would like to see a low-income housing complex built. Two drug houses were shut down. The sidewalk project is complete.

### 4. Pine Manor – Lee Coleman

Mr. Coleman mentioned they are working together with their gardens. They applied for grant for a well. Ms. Boudreaux mentioned the culinary class graduated.

### 5. Suncoast Estates – Charles Garretson

Mr. Garretson reported the education program continues. The Girl Scouts troop is going well. The feeding program assists 40 – 50 individuals.

Housing is an issue. He inquired about buying homes that need to be rehabed for low-income housing. Ms. Boudreaux mentioned the Housing Rehabilitation Program with the Department of Human and Veteran Services. This is for homeowners who need repairs to their homes.

IV. New Business

A. Community Action Agency Neighborhood District Committee (CAA/NDC) Member Update – Kim Hustad

Ms. Hustad mentioned Mr. John Derrig resigned and there was a previous vacancy. There are 2 people who have expressed interest with the board.

B. \*Community Services Block Grant (C.S.B.G) Work Plan -- Kim Hustad

Ms. Hustad stated the Community Services Block Grant Work Plan would need to be tabled at this time.

At this time, Mr. Coleman closed the CAA/NDC meeting and opened the Public Hearing.

V. Second Public Hearing U.S. Department of Housing and Urban Development (HUD) Annual Action Plan for (HUD) Fiscal Year 2018-2019 – Jeannie Sutton

Ms. Jeannie Sutton stated this is the second public hearing for the U.S. Department of Housing and Urban Development Annual Action Plan. She reviewed the eligible activities for each of the funding sources included in the plan. The Community Development Block Grants funds are used for community development needs; e.g. public facilities, housing, rehab to homes, economic development and code enforcement. HOME Funds are focused on affordable housing needs. This could include new construction, acquisition and rehab of housing units as well as tenant based rental assistance. The Emergency Solutions Grant is strictly for homeless services. The funding can be utilized for street outreach, shelter renovations, shelter operations and rapid rehousing. Currently it is utilized for shelter operations and rapid rehousing. This year they will also utilize the funding for street outreach. The Consolidated Plan is a five year plan to set goals and spend funds and the annual plan lists specific annual projects that will be undertaken to accomplish those goals.

Deb Reardon inquired about developing SRO model housing, where there are multiple rooms with one main living central area. Is this a model that can be replicated?

Ms. Sutton mentioned a request for proposal went out involving CDBG and HOME funds. Any non-profit can apply for funds for a capital project.

Ms. Tonya Soholt, Habitat for Humanity asked what the difference was in applying for funding with CHDO requirements. Ms. Sutton said HOME requires 15% be set aside for Community Home Development Organization (CHDO). The organization applies for a specific verification through HUD. The CHDO set aside is approximately \$105,000. There is also a non-CHDO housing development activity, which is funded with HOME. Last year it was about \$120,000. It is available for any non profit to apply. Same applies to Community Development Block Grant funds. To apply let Ms. Sutton know, you can be added to the distribution list. This is also advertised in the NewsPress and on the Department's website.

The assessment of Fair Housing has been delayed.

ACTION:

At this time, Mr. Coleman closed the Public Hearing and reconvened the CAA/NDC meeting.

VI. Adjournment

Meeting adjourned.

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Lee Coleman, Chairman

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Richard Sapp, Secretary

C: Lee County Board of County Commissioners, District #1, #2, #3, #4, and #5  
Christine Brady, Assistant County Manager  
Roger Mercado, Director, Human & Veteran Services  
Amanda Swindle, Assistant County Attorney  
Dorothea Austin, Department of Economic Opportunity

## Grantee Unique Appendices

### Attachments

Affidavit of Publication, January 2018 Public Hearing

Affidavit of Publication, March 2018 Public Hearing

Affidavit of Publication, June 2018 Public Comment Period

2018 Annual Action Plan County Project Location Map

2018 Annual Action Plan Low Income Areas and Hispanic Concentration Map

2018 Annual Action Plan Low Income Areas and Minority Concentration Map

Written Standards for CoC and ESG Projects

**THE NEWS-PRESS**  
*Published every morning*  
*Daily and Sunday*  
*Fort Myers, Florida*  
**Affidavit of Publication**

STATE OF FLORIDA  
 COUNTY OF LEE

Before the undersigned authority, personally appeared **Sue Bridges** who on oath says that he/she is an **Assistant** of the News-Press, a daily newspaper, published at Fort Myers, in Lee County, Florida; that the attached copy of advertisement, being a

**DISPLAY**  
 in the matter of:  
**Notice of Public Hearing**  
**Development of 2018 Action**  
 in the court was published in said newspaper in the issues of

**January 5, 2018**

Affiant further says that the said News-Press is a newspaper of general circulation daily in Lee, Charlotte, Collier, Glades, and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County, Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or reward for the purpose of securing this advertisement for publication in the said newspaper.

*Sue Bridges*

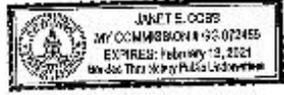
Sworn to and subscribed before me this 5th day of January, 2018.

By **Sue Bridges**  
 personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public *Janet E Cobb*

Print Name: **Janet E Cobb**  
 My commission Expires: February 13, 2021



### Notice of Public Hearing

In accordance with U.S. Department of Housing and Urban Development (HUD) regulations governing Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME programs, Lee County hereby notifies the public that public hearings will be held to take comment related to the development of the 2018 Annual Action Plan. Lee County will use 2017 budgeted figures for planning purposes, as the 2018 amounts have not been announced. In general, housing, community development, and projects to assist the homeless will be undertaken.

Lee County encourages residents to participate in the development of this plan. Lee County will hold two public meetings, the first on January 18, 2018 at 5:30 pm and the second on March 8, 2018, at 6:30 pm at Lee County Human and Veteran Services, 2440 Thompson Street, Fort Myers. All comments from residents will be considered in preparing the final plan and reported in the document.

In accordance with the Americans with Disabilities Act, Lee County will not discriminate against individuals with disabilities in its services, programs, or activities. To request an auxiliary aid or service for effective communication or a reasonable modification to participate, contact Joan LaGuardia, (239) 533-2214, Florida Relay Service 711, or jaguardia@leegov.com. Accommodation will be provided at no cost to the requestor. Requests should be made at least five business days in advance.

Persons needing translation services should contact Jeannie Sutton at 239-533-7958, by email at jsutton@leegov.com, or in person at Lee County Human and Veteran Services, 2440 Thompson Street, Fort Myers, Florida 33901. Requests should be made 48 hrs in advance. Accommodation will be provided at no cost to the requestor.

De acuerdo con el Acto de Americanos Discapacitados, el Condado de Lee no discriminará contra individuos con discapacidades en sus servicios, programas o actividades. Para solicitar una ayuda auxiliar o servicio para la comunicación efectiva o una modificación razonable para participar, póngase en contacto con Joan LaGuardia por teléfono al 239-533-2214; a través del Servicio de Relación al Ciudadano de Florida, llamando al 711; o jaguardia@leegov.com.

Las personas que necesitan servicios de traducción se deberían poner en contacto Jeannie Sutton al 239-533-7958, por el correo electrónico en jsutton@leegov.com, o en persona en el Servicios Humanos del Condado de Lee, 2440 Thompson Street, Fort Myers, Flóríd 33901. Las solicitudes deberían ser hechas 48 horas de anticipación. El alojamiento será proporcionado gratis al solicitante.

JAN 5 2018 5PM 1912

**THE NEWS-PRESS**  
 Published every morning  
 Daily and Sunday  
 Fort Myers, Florida  
**Affidavit of Publication**

STATE OF FLORIDA  
 COUNTY OF LEE

before me, undersigned authority, personally appeared  
**Sue Bridges** who on oath says that he/she  
 is an Assistant of the News-Press, a daily  
 newspaper, published in print and online  
 at Fort Myers, in Lee County, Florida; that  
 the attached copy of advertisement, being a

**Legal Display**  
 In the office of  
**2nd Public Hearing Notice**  
**March 8, 2018**  
 In the case of **2018-0001-0001** and **2018-0002-0001**  
 the article is the basis of

**February 22, 2018**  
 Affiant herein says that the **News-Press** is a newspaper of  
 general circulation daily in Lee, Charlotte, Collier, DeSoto, and  
 Hendry Counties and published at Fort Myers, in said Lee  
 County, Florida and that said newspaper has heretofore been  
 lawfully published in said Lee County, Florida, and that  
 and has been entered as a second class mail matter at the post  
 office at Fort Myers in said Lee County, Florida, for a period of  
 years and providing the fact that said newspaper is published  
 of the advertisement and affiant further says that he/she has  
 within paid and provided any postage, dues or expenses any  
 lawfully, under no obligation is subject for the purpose of  
 securing this advertisement its publication in the said  
 newspaper.

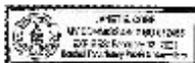
*Sue Bridges*  
 Sworn to and submitted before me this 22nd day  
 of February, 2018.

By **Sue Bridges**  
 personally known to me or who has produced

no identification, and who did or did not take an  
 oath.

Notary Public: *Janet E Cobb*

Print Name: **Janet E Cobb**  
 My commission Expires February 18, 2021



**Lee County Notice of Public Hearing**

In accordance with the Department of Housing and Urban Development (HUD) regulations regarding Community Development Block Grant (CDBG) emergency solutions grant (ESG), 2018 CDBG program, Lee County is hereby notifying the public of a public hearing will be held to take comments related to the development of the 2018 Action Plan for the 2018-2021 budget cycle for the following purposes:

As the 2018 annual plan has not been completed, in general, regarding community development program to assist the homeless of the homeless Lee County emergency shelter/rapid rehousing for development of a plan for the 2018-2021 budget cycle.

Lee County will be holding a public hearing on March 8, 2018, at 10:00 AM in Lee County Board Room located at 3040 Thompson Street, Fort Myers, FL 33901. All comments from the public will be accepted in person at the time and address in the following:

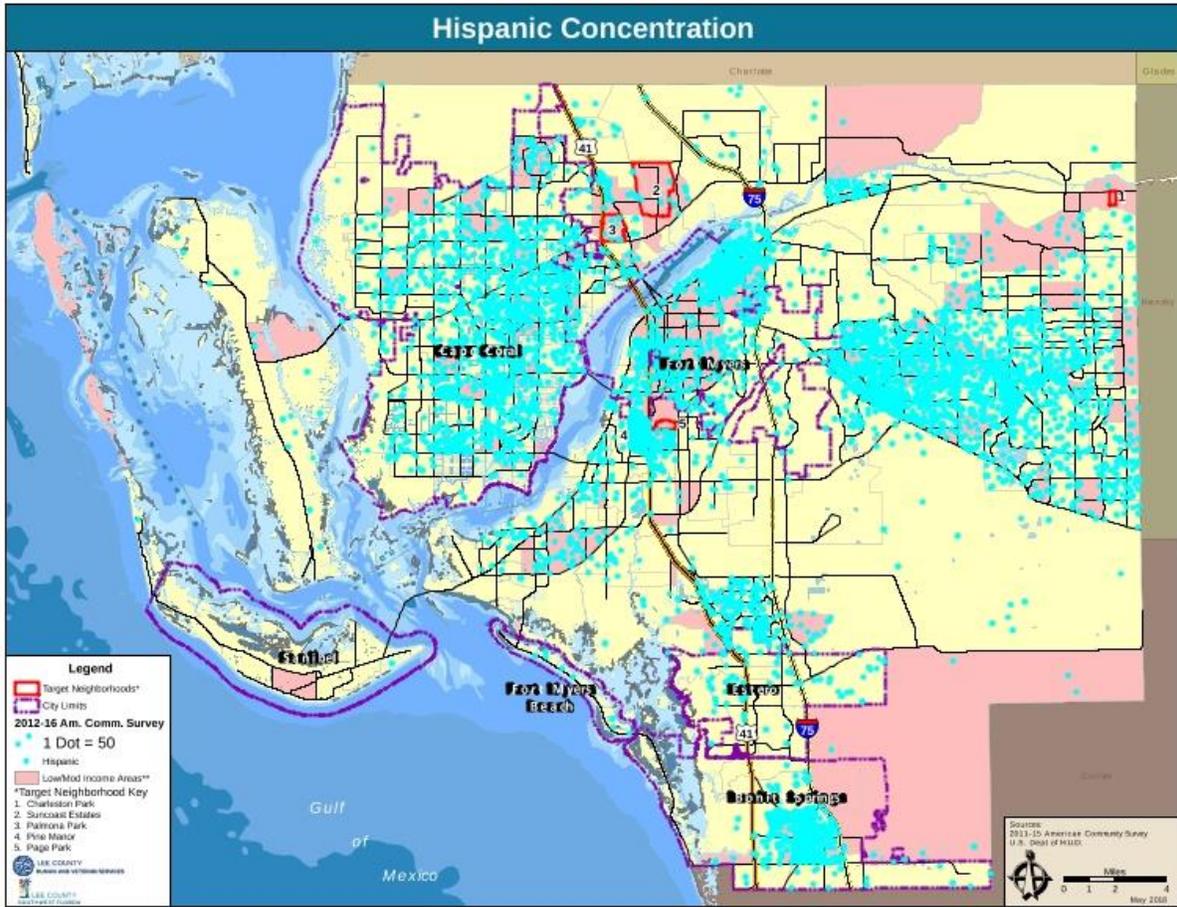
Public comments will be received until March 8, 2018. Lee County will not discriminate against any individual or group based on race, sex, religion, or ethnicity. To request an auxiliary aid or service for a person with a disability, please contact the public hearing contact at Lee County, 1000 Florida Parkway, Suite 100, Fort Myers, FL 33901, Florida. For more information, please contact the public hearing contact at Lee County, 1000 Florida Parkway, Suite 100, Fort Myers, FL 33901. Requests should be made 48 hours in advance. Appointments will be scheduled if no cost to the requester.

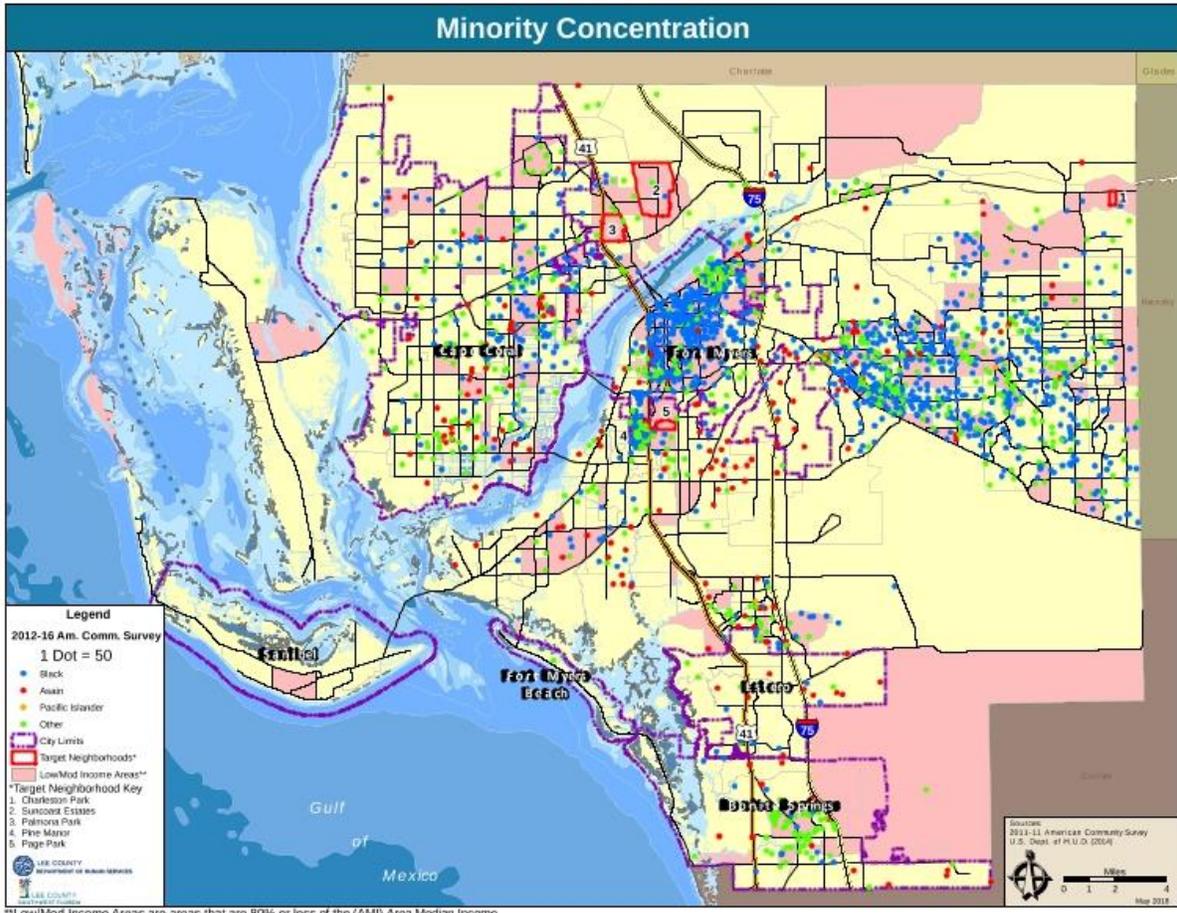
Do not make any other arrangements. Comments should be provided to the public hearing contact at Lee County, 1000 Florida Parkway, Suite 100, Fort Myers, FL 33901, Florida. For more information, please contact the public hearing contact at Lee County, 1000 Florida Parkway, Suite 100, Fort Myers, FL 33901. Requests should be made 48 hours in advance. Appointments will be scheduled if no cost to the requester.

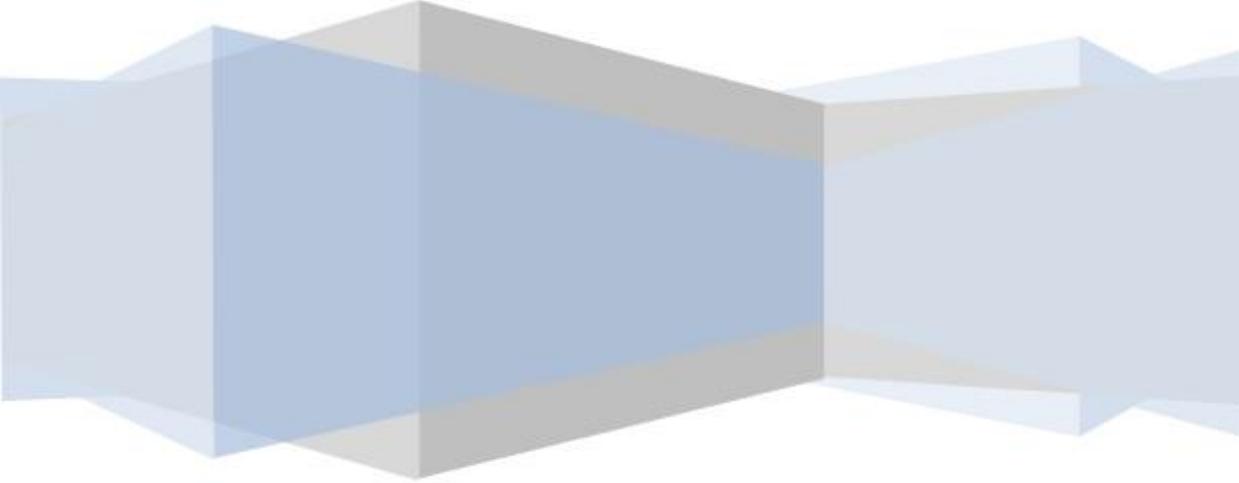
For more information, please contact the public hearing contact at Lee County, 1000 Florida Parkway, Suite 100, Fort Myers, FL 33901. Requests should be made 48 hours in advance. Appointments will be scheduled if no cost to the requester.











# **Written Standards and Coordinated Entry Policies and Procedures**



**Approved by the Lee County CoC Governing  
Board on January 17, 2018**

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## OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 reauthorized the McKinney-Vento Homeless Assistance programs. Through the enactment of the HEARTH Act, the Department of Housing and Urban Development (HUD) published the new Continuum of Care (CoC) Program interim rule (24 CFR Part 578). The CoC Program interim rule requires that the CoC establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant (ESG) program. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in all CoC and ESG programs.
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance through homelessness prevention, diversion, street outreach, emergency shelter, rental assistance, permanent supportive housing assistance, transitional housing assistance, joint transitional housing to rapid re-housing, and rapid re-housing assistance.
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers.
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention, rental assistance, or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

In addition, 24 CFR 578.7(a)(8) and CPD-17-01 requires the Lee County Continuum of Care (CoC) to establish and operate a Coordinated Entry System (CES) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. Coordinated Entry is designed to provide standardized access and assessment, and coordinate housing and services for individuals and families experiencing homelessness. Coordinated Entry facilitates referrals and housing placements to ensure that individuals and families experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs.

The Lee County CoC agrees that these standards must be applied consistently across the entire CoC defined geographic area. Additionally, Lee County CoC members agree to administer their assistance in compliance with the CoC's written standards upon award of CoC, ESG or other applicable funds. Recipients and sub-recipients of CoC, ESG and other applicable funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Lee County CoC, the CoC Program interim rule, or any other federal guidance.

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## **DEFINITIONS**

### **HOUSING FIRST**

The *Housing First* approach is a data driven solution to homelessness. *Housing First* approaches feature direct, or nearly direct, placement of targeted homeless people into permanent housing where supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. *Housing First* approaches ensure that the risk factors that make finding and maintaining housing more challenging are used to screen people into assistance rather than screening them out.

*Housing First* requires that program participants are not screened out based on:

- Having too little or no income;
- Active or history of substance use;
- Type or extent of disability related support needed;
- Resistance to receiving services;
- History of eviction, poor credit, lease violations, or no lease history;
- Having a criminal record with exceptions for state-mandated restrictions; or
- History of victimization (e.g. domestic violence, sexual assault, childhood abuse).

Additionally, *Housing First* programs must ensure that participants are not terminated from the program for:

- Failure to participate in supportive services;
- Failure to make progress on a service plan;
- Loss of income or failure to improve income; or
- Any other activity not covered in a lease agreement typically found for unassisted persons in the Lee County.

All Lee County CoC service providers are required to implement a *Housing First* approach that ensures low barrier program entry and the provision of optional supportive services, both during and post-housing, that promote housing stability and overall well-being.

### **SEVERITY OF SERVICE NEEDS**

In General, persons identified as having the most severe service needs, are those individuals or families for whom at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- For youth and victims of domestic violence, high risk of continued trauma or high-risk of harm or exposure to very dangerous living situations.

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### CATEGORY 1: LITERALLY HOMELESS

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

#### Verification Requirements

- (a) Written observation by an outreach worker; or
- (b) Written referral by another housing or service provider; or
- (c) Certification by the individual or head of household seeking assistance state that (s)he was living on the streets or in shelter;
- (d) For individuals exiting from and an institution – one of the form of evidence above, and:
  - a. Discharge paperwork or written/oral referral, or
  - b. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution.

### CATEGORY 2: IMMINENT RISK OF HOMELESS

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

#### Verification Requirements

- (a) A court order resulting from an eviction action notifying the individual or family that they must leave; or
- (b) For individuals and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- (c) A documented and verified oral statement; and
- (d) Certification that no subsequent residence has been identified; and
- (e) Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

### CATEGORY 3: HOMELESS UNDER OTHER FEDERAL STATUTES

- (3) Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

#### Verification Requirements

- (a) Certification by the non-profit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- (b) Certification of no PH in the last 60 days; and

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- (c) Certification by the individual or head of household, and any available supporting documentation, that (S)he has moved two or more times in the past 60 days; and
- (d) Documentation of special needs or 2 or more barrier.

**CATEGORY 4: FLEEING/ATTEMPTING TO FLEE DOMESTIC VIOLENCE**

- (4) Households who: are fleeing, or attempting to flee domestic violence; have no subsequent residence; and have no resources or support networks to obtain other permanent housing.

**Verification Requirements**

- (a) For victim service providers:
  - a. An oral statement by the individual or head of household seeking assistance which states; they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by an intake workers.
- (b) For non-victim service providers:
  - a. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by a caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
  - b. Certification by the individual or head of household that no subsequent residence has been identified; and
  - c. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

**CHRONICALLY HOMELESS**

The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:

(a) A “homeless individual with a disability,” as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii. has been homeless and living a described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Status in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

(c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of Notice CPD-16-11), including a family whose composition has fluctuated while the head of household has been homeless.



### **Verification Requirements**

In accordance with 24 CFR 578.1036(a)(4), all recipients of dedicated and non-dedicated CoC Program-funded PSH must obtain documentation to verify that an individual or family is chronically homeless for the purposes of eligibility.

## **CROSS-CUTTING REQUIREMENTS**

### **VIOLENCE AGAINST WOMEN ACT OF 2013 (VAWA)**

On November 16, 2016 the U.S. Department of Housing and Urban Development published the final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking (Federal Register Document #2016-25888). This final rule prohibits an applicant for assistance or tenant assisted under a covered housing program from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation (24 CFR 5.2005 (b)(1)).

In addition, the VAWA Final Rule requires that each covered housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in 24 CFR 5.2005 (e)(2). Lee County's Emergency Transfer plan, Attachment 1, encompasses all CoC, Emergency Solutions Grant (ESG), and HOME funded programs. All covered housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Data must include the outcomes of each request, and must be provided to Lee County upon request.

VAWA in no way limits the authority of the covered housing program to terminate assistance or evict a tenant under a covered housing program if the provider can demonstrate that an actual and imminent threat to other tenants or those employed at or providing service to the property of the covered housing provider would be present if that tenant is not evicted or terminated (24 CFR 5.2005 (d)(3)).

### **EDUCATIONAL SERVICES**

All Lee County CoC service providers must have written policies in place which ensure that individuals and families who become homeless are informed of their eligibility for and receive access to educational services. These policies should include how homeless families with children will be informed of and referred to the Lee County School Districts homeless students program, A.C.C.E.S.S. Such policies should also include information for all homeless individuals and families regarding local technical schools and universities, which may offer programs and assistance for persons who are homeless.

Additionally, programs that specifically serve families with children must have a staff person designated as the education liaison that will ensure that children are enrolled in school and connected to the A.C.C.E.S.S. program, as well as Head Start, if applicable.

### **COORDINATION WITH MAINSTREAM SERVICES**

A primary function of case management is to make and coordinate referrals with community resources and mainstream services such as: Food Stamps, Medicaid, Child Care, SSI/SSDI, Veteran's Services, Section 8 Housing, mental health services, abuse services, etc. Staff from all funded agencies are required to make referrals and ensure clients access the referred services. Staff must also make necessary accommodations to ensure that clients needing additional assistance to utilize services have the necessary resources. Client files from funded agencies will be monitored to ensure that referrals and accommodations are appropriate, consistent, and timely.

### **HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

All projects funded by or through Lee County Human and Veteran Services must ensure that data on all persons served and all activities assisted are entered into the community-wide HMIS, Client Services Network (CSN), in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the recipient of funds is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into HMIS.

### **ENVIRONMENTAL REVIEWS**

Lee County Human and Veteran Services serves as the responsible entity, and will perform environmental reviews for applicable projects in accordance with 24 CFR Part 58.

CoC funded projects that consist only of leasing or rental assistance activities require a "limited scope" environmental review. The limited scope review need only analyze applicable environmental laws and authorities and may document that the project is in compliance with others without analysis. A limited scope review is appropriate only if the project consists entirely of leasing or rental assistance activities in existing residential buildings without any associated physical impacts, including repairs, rehabilitation, or new construction.

Lee County Human and Veteran will perform limited scope reviews for all CoC rental assistance activities which do not consist of any repairs, rehabilitation, or new construction using the "Limited Scope Environmental Review Instructions – Continuum of Care (CoC)" and "Limited Scope Environmental Review Format – Continuum of Care (CoC)" supplied by HUD.

### **NONDISCRIMINATION AND EQUAL OPPORTUNITIES**

The Lee County CoC operates the coordinated entry system in accordance with all federal statutes including, but not limited to: the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Title II and Title III of the Americans with Disabilities Act. All service providers, where assistance is provided through Community Planning and Development (CPD) programs, including assistance under the: HOME Investment Partnerships program (24 CFR part 92), Housing Trust Fund program (24 CFR part 93), Community Development Block Grant program (24 CFR part 570), Housing Opportunities for Persons With AIDS program (24 CFR part 574), Emergency Solutions Grants program (24 CFR part 576), Continuum of Care program (24 CFR part 578), or Rural Housing Stability Assistance Program (24 CFR part 579), must ensure equal access to the HUD-assisted program in accordance with all general HUD program requirements as specified in 24 CFR Part 5.

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Lee County CoC requires service providers to practice a person-centered model that incorporates participant choice and inclusion of all homeless subpopulations present in Lee County, including homeless veterans, youth, and families with children, individual adults, seniors, victims of domestic violence, and Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex (LGBTQI) individuals and families.

All CoC and ESG funded service providers must ensure that all persons have fair and equal access to the coordinated entry process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religious preference, disability, type or amount of disability, gender identity, perceived gender identity, marital status, sexual orientation, or perceived sexual orientation.

Additionally, service providers must maintain compliance with the HEARTH Act's involuntary family separation provision (42 USC 11361a), which ensures that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, marital status, gender, gender identity, perceived gender identity, sexual orientation, or disability, when entering shelter or housing.

### **REASONABLE ACCOMMODATIONS**

The Lee County CoC ensures that persons with disabilities have equal access to the Coordinated Entry System through compliance with the requirements of Title II and Title III of the Americans with Disabilities Act. Lee County does not discriminate against individuals with disabilities on the basis of disability in the County's services, programs, or activities.

To request an auxiliary aid or service for effective communication or a reasonable modification clients may contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Persons needing translation services should contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Accommodations and translation services will be provided at no cost to the requestor.

All coordinated entry access points must be accessible for persons with disabilities, include those who use wheelchairs and those who are least likely to access homeless assistance. Upon request, all agencies must provide appropriate and reasonable accommodations for persons with disabilities and/or Limited English Proficiency (LEP) so they can participate equally in the Coordinated Entry process, including qualified language interpreters, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments, disabilities, or those with LEP.

### **RECORDKEEPING**

All projects must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.

Documentation of intake must include evidence relied upon to establish and verify homeless status; however, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake

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worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

### **STRATEGY FOR ENSURING COMPLIANCE**

CoC and ESG funded service providers will be monitored annually by Lee County to ensure compliance with the standards and laws listed here within. The monitoring will include a review of the provider policies, procedures, and practices to ensure compliance with all federal regulations, laws, standards, rules, and any other local policies applicable to the program being monitored. The monitoring report will include any findings or concerns related applicable laws, standards, and rules specified here within.

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## **CORE ELEMENTS OF THE COORDINATED ENTRY SYSTEM**

The Lee County CoC Coordinated Entry process has four distinct elements: *access, assessment, prioritization, and referral*. The goals of the Coordinated Entry System are to provide:

- **Access**
  - By ensuring that clients know how and where to gain access and receive assistance as efficiently and effectively as possible.
- **Assessment**
  - By ensuring all clients receive standardized assessments and experiences when seeking assistance throughout the CoC, and
  - By ensuring clarity, transparency, consistency, and accountability for homeless clients, referral sources, and homeless service providers throughout the assessment process.
- **Prioritization**
  - By ensuring that clients who have the longest instances of homelessness and/or are the most vulnerable have priority access to limited resources.
- **Referral**
  - By ensuring clients are referred to the type of intervention most appropriate to their immediate and long-term housing and service needs, and
  - By ensuring CoC resources are being used to their full capacity to meet the needs of individuals and families who are homeless.

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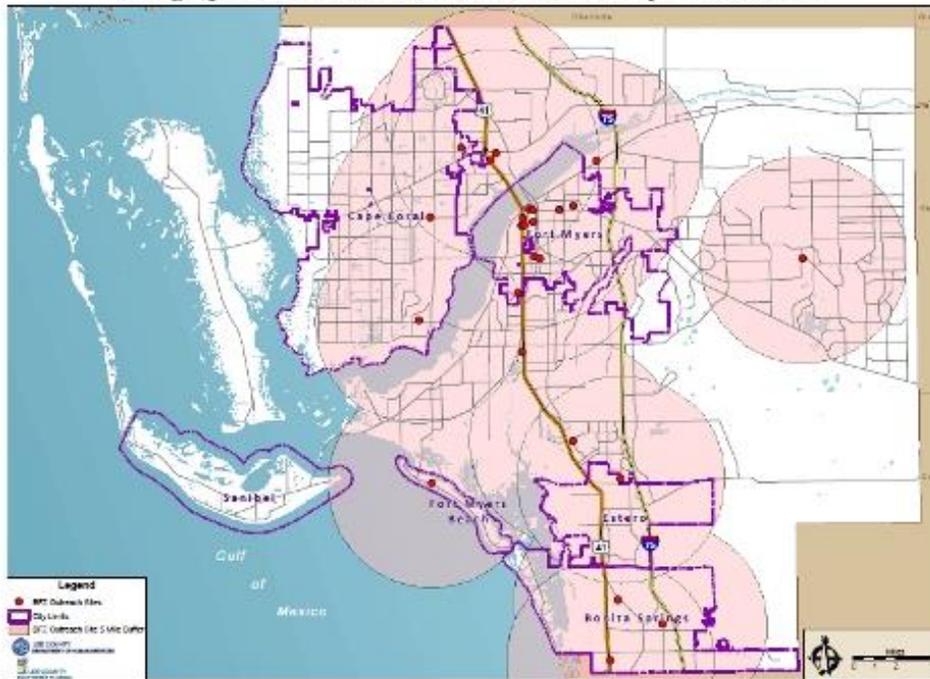
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## ACCESS

The Lee County CoC embraces a “no-wrong-door” approach to ensure that any person who is homeless and seeking assistance has access to the Coordinated Entry System. There are currently 23 points of access located throughout Lee County that provide the same assessment approach for all persons.

**Geographic Distribution of Coordinated Entry Access Points**

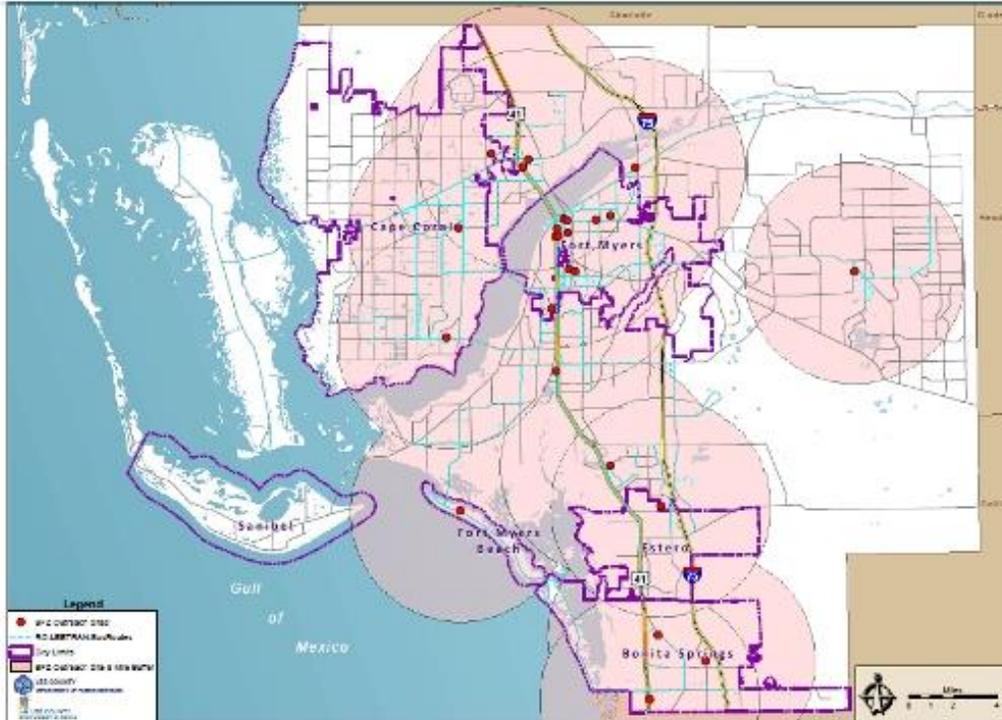


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**Geographic Distribution of Coordinated Entry Access Points in Relationship to Public Transportation (LeeTran) Routes**



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### AFFIRMATIVE MARKETING STRATEGY

The Coordinated Entry Affirmative Marketing Strategy (CEAMS) is a communication and management strategy designed to make the coordinated entry access points and CoC housing and services accessible to all persons regardless of sex, gender identity, perceived gender identity, sexual orientation, perceived sexual orientation, age, color, national origin, ethnicity, limited English proficiency, disability status, family status, marital status, or religion.

All providers participating in the coordinated entry system (CES) shall:

1. Identify special populations and subpopulations in the CoC jurisdiction who are eligible for CES services but have historically not participated, enrolled, and entered in CoC programs in rates commensurate with overall subpopulation prevalence.
2. Outline an outreach program that includes special measures designed to attract those groups identified as least likely to apply and other efforts designed to attract persons from the total population.
3. The effectiveness of the marketing program can be determined by noting if the program effectively attracted persons experiencing homelessness who are:
  - a. From minority groups, regardless of gender, as represented in the population of the CoC jurisdiction;
  - b. Persons with disabilities and their families;
  - c. Persons whose legal history, housing history, substance use history, behavior health status, physical health status, or any other attribute or characteristic has historically served as a barrier to gaining entry to CoC services and/or housing.

The Lee County CES shall be marketed throughout the CoC's geographic area via the Lee County and Lee County Homeless Coalition websites, social media pages, and other means as deemed appropriate. All policies and procedures related to CES shall be advertised on the Lee County HMIS page:

<http://www.lee.gov/dhs/csn/downloads>. Additional efforts to carry out the CEAMS shall include:

1. Advertising in locations or media that are used and viewed or listened to by those identified as least likely to enter CoC services and housing, such as youth, individuals who are chronically homeless, and families with children;
2. Marketing CoC services and housing to specific community, religious, support organization or other groups frequented by those least likely to enter CoC services and housing;
3. Distribution of a brochure and other printed materials, which describe the coordinated entry process to be used by persons experiencing a housing crisis to locate, identify, and access CES services.
4. Incorporating information regarding compliance with the Fair Housing Act, American's with Disabilities Act, and the CEAMS into CES training protocols.

*In accordance with the Americans with Disabilities Act, Lee County does not discriminate against qualified individuals with disabilities in its services, programs, or activities. To request an auxiliary aid or service for effective communication or a reasonable modification clients may contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Persons needing translation services should contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Accommodations and translation services will be provided at no cost to the requestor.*

### **PRIVACY PROTECTIONS & PARTICIPANT AUTONOMY**

The Lee County HMIS Privacy Notice describes the privacy policy of the Lee County HMIS and the agencies participating in the Homeless Management Information System (HMIS). The notice outlines that personal information is collected only when appropriate, and no information may be used or disclose for any purpose other than for that of the program. Information may only be used or disclosed to comply with legal and other obligations. Before conducting a Coordinated Entry, the Client Informed Consent and Release of Information Authorization form must first be signed, and the client must give consent to the exchange of information on Client Services Network (CSN).

Individuals are free to decide what information they provide during the assessment process, and agencies are prohibited from denying assessment or services to individuals who refuse to provide specific information, unless that information is necessary to establish program eligibility according to program regulations. Additionally, the assessment and prioritization process cannot require disclosure of specific disabilities or diagnoses. Specific diagnosis or disability information may only be obtained for the purposes of determining program eligibility to make appropriate referrals, such as for Permanent Supportive Housing (PSH).

Individuals shall be allowed to refuse to answer assessment questions and to refuse housing and service options without retribution or limitations on their access to assistance. Should an individual reject a housing or service option they will maintain their prioritization for the next available housing or service option. The housing or service option that was rejected shall be provided to the next individual according to the prioritizations outlined in the program prioritizations here within.

Individuals who do not sign the release of information should not have an assessment completed, and shall not be denied services unless Federal statute requires collection, use, storage, and reporting of the individuals personally identifiable information as a condition of program participation.

### **SAFETY PLANNING**

No individual may be denied access to the assessment process, supportive services, housing or other services provided by victim specific or non-victim specific service providers on the basis that an individual is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

Victims of domestic violence, dating violence, sexual assault, stalking or human trafficking are not maintained in HMIS within the Lee County CoC. Individuals and families who are fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking will receive an assessment via paper, which will be entered into an HMIS comparable database. Data maintained in comparable databases by victim specific service providers is reconciled to Lee County HMIS data annually.

Any person who knows, or has reasonable cause to suspect, that a child or elder is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's or elder's welfare is a mandatory reporter, as specified by [Florida Statute § 39.201\(1\)\(a\)](#), and must make a report to the Florida Abuse Hotline at 1-800-962-2873 or online at [www.myflfamilies.com/service-programs/abuse-hotline/report-online](http://www.myflfamilies.com/service-programs/abuse-hotline/report-online). To report an allegation in Spanish or Creole, call 1-800-962-2873, for TDD (Telephone Device for the Deaf) 1-800-453-5145. This toll free number is available 24 hours a day, 7 days a week with counselors waiting to assist you. All reports are confidential.

### **EMERGENCY SERVICES**

The Family Emergency Homeless Shelter, operated by The Salvation Army (TSA), completes client prescreening Monday through Friday from 1:00 pm to 3:00 pm. TSA provides the client with a letter stating eligibility status. Clients are admitted to the shelter via intake, which is completed Monday through Friday from 4:00 pm to 8:00 pm. Intake may occur after 8:00 pm if there are extenuating circumstances.

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ACT, the local domestic violence shelter, provides services to all persons without regard to race, color, religion, national origin, gender, age, mental or physical disability, sexual orientation, citizenship, marital status, gender identity (or expression), language spoken, immigration status and any other protected class, through their 24-hour crisis hotline. The crisis hotline (239-939-3112) offers information and referrals, safety planning, and shelter admission assessments.

The Bob Janes Triage Low Demand Shelter, operated by The Salvation Army (TSA) and SalusCare, Inc., admits clients between the hours of 7:30 am and 9:00 pm through Lee County Law Enforcement Departments, and various other agencies. Clients coming from Lee Health hospitals will be admitted 24 hours per day. Initial assessments are conducted by the on-staff nurse.

## **ASSESSMENT**

All HMIS participating agencies making client referrals in the system will be required to first complete the Coordinated Entry screen. Upon completion, the system will notify the user if a Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) is required. Individuals that are determined to be a veterans, chronically homeless, or homeless households with children are required to complete a full VI-SPDAT. The VI-SPDAT score will determine the client's and/or household's needs and initial prioritization for housing resources and supportive services.

*NOTE: All assessments conducted on paper must be recorded in HMIS within 48 hours of when the information was first collected.*

Information gathered and prioritizations made must be consistent with [24 CFR 578.400\(e\)](#) and [24 CFR 578.7\(a\)\(9\)](#). However, the assessment tools may not produce a complete body of information necessary to determine household prioritization. For this reason, case workers or others working with homeless households may gather additional information relevant to the factors in accordance with CoC prescribed [prioritization criteria](#) to make decisions.

The Coordinated Entry process must not be used to screen people out due to perceived barrier to housing or services, including, but not limited to:

- Too little or no income;
- Active or a history of substance abuse;
- Domestic violence history;
- Resistance to receiving services;
- The type or extent of disability-related services or supports that are needed;
- History of evictions, lease violation or lack of leaseholder history;
- Criminal records; or
- Poor credit.

## **ASSESSOR TRAINING**

The HMIS Lead Agency will provide at least one annual training opportunity, which may be in-person, a live or recorded online session, or a self-administered training, to participating staff at organizations that serve as access points or otherwise conduct assessments. Annual training opportunities will be advertised on the Lee County Human and Veteran Services webpage, Facebook page, and solicited directly to service providers in the CoC's geographic area.

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## TRAINING PROTOCOLS

The purpose of the annual Coordinated Entry training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the CoC's coordinated entry process, including its written policies and procedures.

Coordinated entry training will include:

- Identifying clients that are appropriate for the coordinated assessment based on the information available.
- Educating clients about what to expect from the process and how to be matched with the most appropriate housing and services.
- Follow up with clients after the completion of assessment and check their status in HMIS.
- Review of most current HUD data standards and CoC Written Standards for Prioritization.
- Protocols for conducting assessments, including the CSN Policies and Procedures Manual, which provides screen-by-screen instructions for completing an assessment.
- Review of the Coordinated Entry Policies and Procedures, which include the requirements for prioritization and the criteria for uniform decision-making and referrals.
- Overview of the requirements for use of assessment information to determine prioritization and program qualification.

All training is tailored to the individual needs of the service agencies, but based primarily on the Coordinated Assessment CSN User Manual available on the HMIS webpage:

<https://www.leegov.com/dhs/csn/downloads>.

*Training protocols may vary by on agency. The general Coordinated Entry System training protocols will be reviewed and updated by the Coordinated Entry Committee annually.*



## PRIORITIZATION

Homelessness interventions, including Street Outreach, Emergency Shelter, Diversion, Prevention, Permanent Supportive Housing, Rapid Re-Housing, Rental Assistance, Transitional Housing – Rapid Re-Housing, and Transitional Housing will be prioritized based on the severity of service needs and vulnerability. Of those eligible households the populations must be prioritized in accordance with The U.S. Interagency Council on Homelessness (USICH) plan, Opening Doors, and other HUD guidance on prioritization of chronically homeless households and policy briefs on coordinated entry systems. The basic process for Coordinated Entry and client prioritization is outlined in *Chart 1* below.

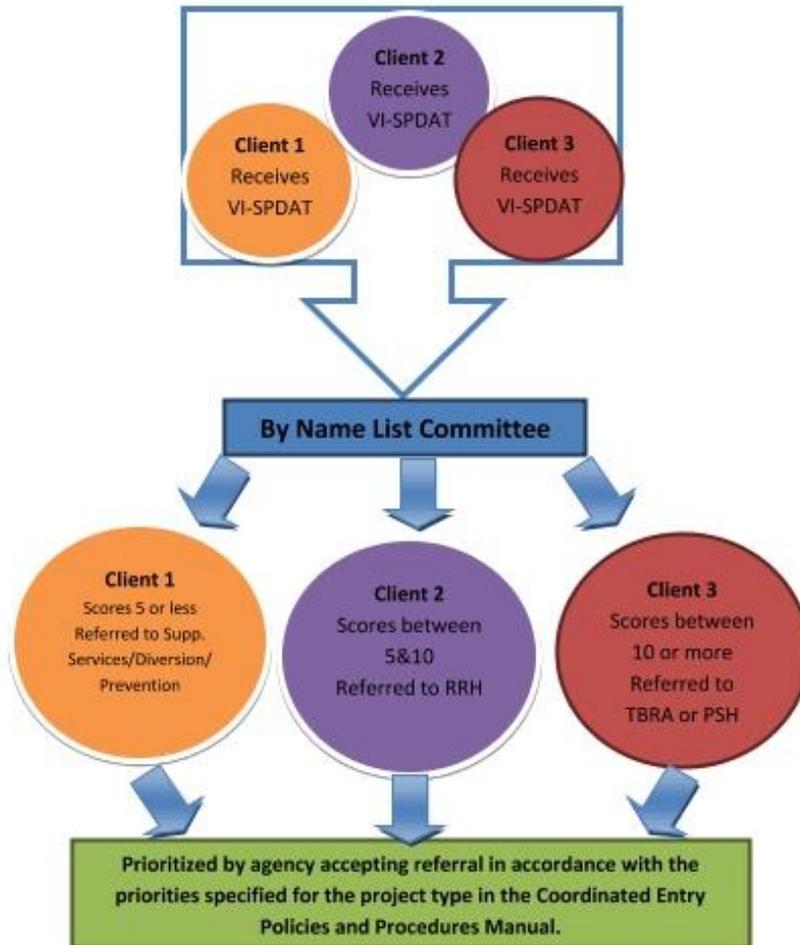
Lee County's coordinated entry system identifies prioritizes service needs as follows (only going to the next level as needed to break a tie between two or more individuals):

1. **Medical Vulnerability:** The first prioritization criteria will expedite placement into housing for individuals with severe medical needs who are at greater risk of death. This score would be based on questions 22-34 of the vulnerability analysis, with a maximum score of 5.
2. **Overall Wellness:** The second prioritization factor targets individuals with similar medical needs as criteria number 1, who will be prioritized when they have behavioral health conditions or histories of substance use, which may either mask or exacerbate medical conditions. This score will be based on questions 21 through 50 of the vulnerability analysis (i.e., the "Wellness Domain").
3. **Unsheltered Sleeping Location:** The third prioritization criteria are the location where the individual sleeps, based on question 13 of the vulnerability analysis. Unsheltered individuals will be given priority over sheltered individuals.
4. **Length of Time Homeless:** The fourth prioritization factor is the length of time an individual has experienced homelessness, giving priority to the person that has experienced homelessness the longest (based on question 1 of the vulnerability analysis).
5. **Date of vulnerability analysis assessment:** The final prioritization criteria will be the date of the individual's assessment, giving priority to the earliest date of assessment.

In all programs, priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan, and in accordance with 24 CFR 576.409. All CoC funded transitional housing, rapid re-housing, and permanent supportive housing programs will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99(j)(8).



Chart 1



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## PERMANENT SUPPORTIVE HOUSING

Permanent Supportive Housing (PSH) can only assist individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants, but should not be required as a condition to remaining in housing.

### Eligibility

For permanent supportive housing programs, households must meet both the HUD definition of homelessness under **Category 1** or **Category 4**, and have a disability, as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)). For beds prioritized for Chronically Homeless individuals and families, the head of household must have a qualifying disability and meet all of the criteria required as defined in 24 CFR 578.3. Once meeting the Category 1 or Category 4 and disability requirements, households are then prioritized as indicated below.

### Prioritization

These priorities have been established to ensure that Lee County's most vulnerable people and high users of resources are quickly transitioned into permanent supportive housing. The Lee County CoC has established that individuals and families scoring 10 or above on the VI-SPDAT will be recommended for placement into permanent supportive housing. Individuals, and families scoring 10 or above, will then be prioritized primarily in the following order (CPD Notice 16-11), and then by severity of service needs.

#### For CoC or ESG funded PSH beds dedicated or prioritized for Chronically Homeless:

1. Chronically homeless individuals and families with the most severe service needs.
2. Chronically homeless individuals and families with the longest history of homelessness.
3. All other chronically homeless individuals or families.

#### For CoC or ESG funded PSH beds not dedicated or prioritized for Chronically Homeless, or when there are no Chronically Homeless individuals or families:

1. **First Priority**—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs
  - a. An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.
2. **Second Priority**—Homeless Individuals and Families with a Disability with Severe Service Needs
  - a. An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
3. **Third Priority**—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs
  - a. An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
4. **Fourth Priority**—Homeless Individuals and Families with a Disability Coming from Transitional Housing

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- a. An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

#### **Minimum Standards – PSH**

All referrals to permanent supportive housing will be made through the coordinated entry system. The following minimum standards will be applied to all permanent housing programs:

- Support services must be made available throughout the duration of stay in housing.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- There is no designated length of stay for program participants.

## RENTAL ASSISTANCE

Tenant, Sponsor, or Project-Based Rental Assistance can only provide assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants, but should not be required as a condition to remaining in housing.

### Eligibility

For rental assistance programs, households must meet both the HUD definition of homelessness under **Category 1 or Category 4**. For beds prioritized for Chronically Homeless individual and families, the head of household must have a qualifying disability and meet all of the criteria required as defined in 24 CFR 578.3. Once meeting the **Category 1 or Category 4 and disability requirements**, households are then prioritized as indicated below. Programs may not establish additional eligibility requirements beyond those specified in **Category 1 and Category 4** and those required by funders.

### Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into permanent housing. The Lee County CoC has established that individuals and families scoring 10 or above on the VI-SPDAT will be recommended for placement into rental assistance programs.

Individuals, and families scoring 10 or above, will then be prioritized primarily in the following order, and then by severity of service needs.

1. Chronically homeless individuals and families with the most severe service needs.
2. Chronically homeless individuals and families with the longest history of homelessness.
3. All other chronically homeless individuals and families.
4. Homeless individuals and families with a disability, as defined in Section 401 of the McKinney-Vento Homeless Assistance Act as amended by S.896 the HEARTH Act of 2009, and with the most severe service needs.
5. Homeless individuals and families with long periods of continuous or episodic homelessness.
6. Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, safe havens, etc.).

### Minimum Standards – CoC Project Based Rental Assistance

Program participants are required to pay a portion of their rent if they are receiving CoC Program Rental Assistance, unless they have no income at all. In permanent supportive housing and transitional housing projects (24 CFR 578.77(c)), the program participant's rent contribution **must be equal to the highest of:**

- 30% of the family's monthly adjusted income (adjustment factors include allowances and deductions for disabled household members, medical expenses, childcare expenses, etc.);
- 10% of the family's monthly gross income; or
- Portion of welfare payments specifically designated by the public welfare agency to meet the family's housing costs.

Rental Assistance providers must assess each program participant's income to calculate the program participant's rent contribution, and to determine the amount the recipient must pay toward rent. If the participant is required to pay for utilities, then a utility allowance must be factored into the rent calculation determination.

**Minimum Standards – HOME Tenant Based Rental Assistance**

Housing selected should not exceed Fair Market Value (FMV) and most importantly, affordable to the client according to household size and income. Per 24 CFR Part 92.252, HUD provides the following maximum HOME rent limits.

The maximum HOME rents are the lesser of:

- 1) The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- 2) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.

The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions. If staff cannot locate, or if the client needs, housing that exceeds FMV, County Homeless (or other non-federal funds) may be used or the client may pay the difference, if able.

Program participants are required to pay a portion of their rent if they are receiving rental assistance, unless they have no income at all. Rental Assistance providers must assess each program participant's income to calculate the program participants rent contribution, and to determine the amount the recipient must pay toward rent. If the participant is required to pay for utilities, then a utility allowance must be factored into the rent calculation determination.

**Minimum Standards – Supportive Services for Veteran Families (SSVF)**

Direct referrals will be made for veterans served through Supportive Services for Veteran Families (SSVF) due to the amount of funding currently available for the program. SSVF will continue to prioritize placements based on the vulnerability analysis scores, and continue to work with providers to streamline processes in order to make progress towards accepting referrals.



### **RAPID RE-HOUSING**

Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. When providing short-term and/or medium-term rental assistance to program participants, the rental assistance is subject to § 578.51(a)(1), but not § 578.51(a)(1)(i) and (ii); (a)(2); (c) and (f) through (i); and (l)(1).

#### **Eligibility**

For rapid re-housing programs, households must meet the HUD's definition of homelessness under **Category 1 or 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

#### **Prioritization**

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into rapid re-housing. The Lee County CoC has established that individuals and families scoring 5 to 9 on the VI-SPDAT will be recommended for placement into rapid re-housing. Individuals and families scoring above 9 on the VI-SPDAT may also be prioritized for rapid re-housing with the approval of the agency administering the project.

Individuals, and families will then be prioritized primarily in the following order, and then by severity of service needs.

1. Households with children (under 18 years of age).
2. Household fleeing domestic violence.
3. Family with head of household between ages 18-24 years of age.
4. Households with behavioral health needs.

#### **Minimum Standards – Emergency Solutions Grant (ESG)**

All referrals to rapid re-housing will be made through the coordinated entry system. The following minimum standards will be applied to all ESG funded rapid re-housing programs:

- Support services in compliance with 24 CFR Part 576.10 (ESG) must be made available throughout the duration of stay in housing.
- Program participants must enter into a written lease agreement between the owner and program participant. For ESG (24 CFR 576.104), there is no minimum lease period for TBRA. Leases for ESG PBRA must have an initial term of one year.
- For ESG maximum participation in a rapid re-housing program cannot exceed 12 months. Exceptions may be granted for an additional 12 months based on Human and Veteran Services' policy.
- Program participants must be re-evaluated not less than once annually to ensure that the type and amount of assistance being received is necessary to retain housing.
- Program participant must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.
  - Supportive Services may not be received for longer than 6 months after rental assistance has ended.

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- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. When possible, rents shall not exceed:
  - The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
  - A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.
- The amount of grant funds used to pay monthly assistance for an eligible person may not exceed the difference between:
  - The lower of the rent standard or reasonable rent for the unit; and
  - The resident's rent payment calculated under § 574.310(d).
- The amount of financial assistance granted may include all move-in costs, moving expenses, utility deposits, etc.
  - ESG Rapid Rehousing assistance pays rent at 100% for the first month, then 70% for months 2 and 3, then 60% for months 4 and 5, then 40% for months 6 and 7, then 25% for months 8, 9, and 10, then 0% for months 11 and 12.

#### **Minimum Standards – Continuum of Care (CoC)**

All referrals to rapid re-housing will be made through the coordinated entry system. The following minimum standards will be applied to all CoC funded rapid re-housing programs:

- Support services in compliance with 24 CFR 578.53 (CoC) must be made available throughout the duration of stay in housing.
- Program participants must enter into a written lease agreement between the owner and program participant. For CoC (24 CFR 578.37(a)(1)(ii)), the lease term must be at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- For CoC maximum participation in a rapid re-housing program cannot exceed 12 months.
- Program participants must be re-evaluated not less than once annually to ensure that the type and amount of assistance being received is necessary to retain housing.
- Program participant must meet with a case manager not less than once per month (24 CFR 578.37(a)(1)(ii)(F)) to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.
  - Supportive Services may not be received for longer than 6 months after rental assistance has ended.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. When possible, rents shall not exceed:
  - The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
  - A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.

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- The amount of financial assistance granted may include all move-in costs, moving expenses, utility deposits, etc.
- CoC Rapid-Rehousing assistance pays 100% of rent costs for months 1 through 3, individuals and families receiving assistance are required to pay 10% of their income towards rent during months 4 through 8, then 20% for months 9 through 12.

### **JOINT TRANSITIONAL HOUSING – RAPID RE-HOUSING**

Joint Transitional Housing-Rapid Re-Housing (TH-RRH) facilitates the movement of homeless individuals and families to Permanent housing (PH) within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

#### **Eligibility**

For joint transitional housing to rapid re-housing programs, households must meet the HUD's definition of homelessness under **Category 1** or **Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

#### **Prioritization**

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into joint transitional housing and rapid re-housing. If multiple households meet the joint transitional housing and rapid re-housing programs individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Length of time homeless
3. Within one of the target populations for transitional housing:
  - a. Households with children (under 18 years of age)
  - b. Household fleeing domestic violence
  - c. Family with head of household between ages 18-24 years of age
  - d. Households with behavioral health needs

#### **Minimum Standards**

All referrals to joint transitional housing and rapid re-housing must be made through the coordinated entry system. The following minimum standards will be applied to all joint transitional housing and rapid re-housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

*Lee County does not currently feature any Continuum of Care funded transitional housing programs. The following standards outline the basic requirements for transitional housing programs funded with funds other than the Continuum of Care, such as ESG, TANF, and Challenge Grant, and for future reference should a transitional housing program be funded in Lee County.*

### **TRANSITIONAL HOUSING**

Transitional housing (TH) facilitates the movement of homeless individuals and families to Permanent housing (PH) within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

#### **Eligibility**

For transitional housing programs, households must meet the HUD's definition of homelessness under **Category 1 or Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

#### **Prioritization**

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into transitional housing. If multiple households meet the transitional housing programs individualized eligibility criteria, then prioritization will take place in the following order:

5. Households with the highest service needs
6. Length of time homeless
7. Within one of the target populations for transitional housing:
  - a. Households with children (under 18 years of age)
  - b. Household fleeing domestic violence
  - c. Family with head of household between ages 18-24 years of age
  - d. Households with behavioral health needs

#### **Minimum Standards**

All referrals to transitional housing must be made through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing. Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

## EMERGENCY SHELTER

The Lee County CoC uses the Emergency Solutions Grant (ESG) Program to fund emergency shelter operations.

### Eligibility

For emergency shelter programs, households must meet the HUD's definition of homelessness under **Category 1 or Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

### Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly placed into emergency shelter. If multiple households meet the emergency shelter programs individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Length of time homeless
3. Within one of the target populations for transitional housing:
  - a. Households with children (under 18 years of age)
  - b. Household fleeing domestic violence
  - c. Family with head of household between ages 18-24 years of age
  - d. Households with behavioral health needs

### Minimum Standards

All referrals to the shelter are made direct from street outreach, Lee County Law Enforcement, Lee Health or other homelessness assistance programs. The following minimum standards will be applied to all emergency shelter programs:

- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be made available throughout the duration of stay in the emergency shelter.

## STREET OUTREACH

*CoC funds may be used by recipients in Continuums of Care for street outreach within the Supportive Services Only (SSO) component as described in 24 CFR 578.37. ESG Funds may be used by grantees for street outreach as described in 24 CFR 576.101. Lee County does not currently use CoC funds for street outreach. The following standards outline the basic requirements for street outreach programs funded with funds other than the Continuum of Care, including, but not limited to Emergency Solutions Grant, Challenge Grant, Temporary Assistance for Needy Families-Prevention, and State Emergency Solutions Grant.*

Street outreach efforts must be linked to the Coordinated Entry System. Lee County ensures that outreach workers have adequate access to both paper and electronic methods of administering a coordinated assessment survey with the same standardized processes offered at site-based access points.

### Eligibility

Individuals and Families defined as Homeless under **Category 1, 2, or 4**, are eligible for assistance through street outreach projects.

### **Prioritization**

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly connected with street outreach services. Street outreach programs be targeted to households:

1. With the highest service needs
2. With the longest length of time homeless
3. Within one of the target populations:
  - a. Households with children (under 18 years of age)
  - b. Household fleeing domestic violence
  - c. Family with head of household between ages 18-24 years of age
  - d. Households with behavioral health needs

### **Minimum Standards**

All referrals to homelessness assistance projects must be made through the coordinated entry system. Street outreach efforts must actively engage the unsheltered homeless population for the purposes of providing immediate support, interventions, and connections with homeless assistance programs and/or mainstream services. Additional minimum standards are assigned based on funding source.

### **PREVENTION SERVICES**

*CoC funds may be used by recipients in Continuums of Care which are designated as high-performing communities for housing relocation and stabilization services, as described in 24 CFR 576.105 and 24 CFR 576.106. The Lee County CoC is not currently designated as a high-performing community, and therefore does not feature a homelessness prevention program funded with CoC funds. The following standards outline the basic requirements for homelessness prevention programs funded with funds other than the Continuum of Care, such as Emergency Solutions Grant (ESG), Temporary Assistance for Needy Families (TANF)-Prevention, County General Funds, Community Services Block Grant (CSBG) and Challenge Grant, and for future reference should Lee County be designated as a high-performing community.*

Lee County CoC homelessness prevention programs provide rental assistance, utility assistance, and supportive services to at risk and otherwise eligible individuals and families to prevent homelessness.

### **Eligibility**

For homelessness prevention programs, households must meet the HUD's definition of homelessness under **Category 1, 2, or 4**, and any additional funder eligibility requirements.

### **Prioritization**

Prioritization for homelessness prevention services are assigned based on the funding source. The Lee County CoC uses multiple funding sources, including Challenge Grant, TANF-Prevention, State of Florida ESG, CSBG, and Lee County General funds to administer homelessness prevention programs. Each individual program must outline prioritization standards based on the requirements imposed by the funder. If no funder requirements are in place, or multiple households meet the prevention program's individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Within one of the target populations for transitional housing:
  - a. Families with children (under age 18)
  - b. Household fleeing domestic violence
  - c. Family with head of household between ages 18-24
  - d. Households with behavioral health needs

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### **Minimum Standards**

All referrals to homelessness prevention projects must be made through the coordinated entry system. Additional minimum standards are assigned based on funding source.

### **DIVERSION SERVICES**

Diversion is implemented to ensure that scarce resources are preserved for the most vulnerable individuals and families. Diversion services provide alternative resources, encourage the development of problem solving skills, and ultimately divert individuals and families to a safe and secure temporary or permanent housing location outside of the CoC homelessness response system.

#### **Eligibility**

Individuals and Families defined as Homeless under **Category 1, 2 or 4** are eligible for assistance through diversion services.

Prioritization for diversion services is largely based on client choice. Individuals and families must first be willing to participate in mediation, and second be willing to invest time developing and implementing problem solutions. Additional priorities for diversion services may be established by service providers, so long as the policies are outlined in a written document(s) and do not conflict with any part of these standards.

### **Minimum Standards**

All referrals services must be made through the coordinated entry system. Additional prioritization and minimum standards are assigned based on funding source.

## **REFERRAL**

All CoC and ESG funded service providers must use the Lee County Coordinated Entry System as the only referral source from which to consider filling vacancies in housing and/or services. Referrals are made through HMIS. Participating agencies are responsible for regularly checking the referral queue and processing clients in a timely manner, and in accordance with the applicable rules and policies found here within.

### **BY-NAME LIST (BNL)**

The Lee County CoC HMIS Lead Agency, Lee County Human and Veteran Services, shall retain and review the master by-name list at least one time per month. Persons on the by-name list will remain active for 60 days. If no contact is made after 60 days the individual will be placed in inactive status. Should contact be made while an individual is in inactive status, they will be moved to active status for another 60 day period.

### **BY-NAME LIST (BNL) COMMITTEE**

The BNL Committee reviews all individuals and families listed, paying particular attention to high risk individuals and those where the tool did not reveal the full depth and/or urgency of the situation. Assessors/case managers utilize the CoC Written Standards and professional judgment to evaluate housing and service options. Clients may be referred to the review panel for any of these reasons regardless of whether the individual participated in the vulnerability analysis process. The BNL Committee strives to be person-centric, not program-centric (i.e., the end result will not always be PSH placement, but rather to match a highly vulnerable person to the appropriate housing resource). The Committee will make every effort to consider the individuals strengths, goals, risks, lived experiences, and choices in the referral process.

In the context of the coordinated entry process, determining eligibility is a project-level process governed by written standards as established in 24 CFR 578.400(e) and 24 CFR 578.7(a)(9). Coordinated entry processes incorporate mechanisms for determining whether potential participants meet project-specific requirements of the projects for which they are prioritized and to which they are referred.

The process of collecting required information and documentation regarding eligibility may occur at any point in the coordinated entry process as long as that eligibility information is not being used as part of prioritization and ranking (e.g. using documentation of a specific diagnosis or disability to rank a person). **The assessment process cannot require disclosure of specific disabilities or diagnosis. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals.** Projects or units may be legally permitted to limit eligibility, e.g., to persons with disabilities, through a Federal statute which requires that assistance be utilized for a specific population, e.g., the HOPWA program, through State or local permissions in instances where Federal funding is not used and Federal civil rights laws are not violated.

### **BNL COMMITTEE REPRESENTATION**

The Committee will be comprised of representatives from the CoC Lead Agency, the HMIS Lead Agency, and agencies funded with CoC, ESG, TANF, Challenge Grant, and other federal, state, and local funds.

*Agencies funded through the Lee County Human and Veterans Services with one of the funding sources identified above **MUST** attend each BNL Committee Meeting.*

Not all cases will have immediate placement. In some instances, the Committee may determine that the initial score and position on the registry is correct given the severity of other cases. In other situations, the Committee may determine that a higher score is warranted, though immediate placement is still not feasible. In still other situations, the Committee may determine that immediate placement is needed to reduce risk of death.

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## **PLANNING**

### **STAKEHOLDER CONSULTATION**

The Lee County CoC and HMIS Lead Agency facilitates ongoing planning and stakeholder consultation concerning the implementation of the Coordinated Entry System through Coordinated Entry Committee and BNL Committee meetings. The Committees are intended to develop an accurate picture of the number and characteristics of Lee County persons who are homeless in order to provide targeted assistance. In addition to collecting information, objectives include developing a provider survey to establish resources and identify gaps, and provide a user group for HMIS users for training and updates.

In addition to Committee meetings, the Lee County CoC solicits feedback annually from funded agencies and households that participated in coordinated entry to gather data regarding the quality and effectiveness of the entire coordinated entry experience. Data is gathered through the following methods:

1. Surveys:
  - a. A survey will be made available to gather data from individuals who have participated in the coordinated entry system. Clients will be notified by their caseworkers that the survey is available and feedback is appreciated.
  - b. A survey to gather data from funded agencies is sent during the month of January by the Lee County Homeless Coalition. Agencies are notified via direct e-mail of the availability of the survey.
2. An annual focus session conducted during at least one Coordinated Entry Committee meeting, and at least one BNL Committee Meeting.

The Lee County CoC and HMIS Lead Agency evaluate the feedback received and make necessary updates to the coordinated entry process written policies and procedures, if necessary to improve user experience.

### **QUALITY EVALUATION**

Annual Coordinated Entry System monitoring will be conducted by the HMIS lead agency, and will include a review of system person measures, participating agency survey data, client survey data, and adherence to the requirements of these policies. The monitoring report will be presented to the CoC Governing Board and general membership for review and feedback.

### **DISCHARGE PLANNING**

Each CoC service provider must develop and implement, to the maximum extent practicable, policies and protocols for the discharge of persons from public funded institutions and systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (42 USC 11362).

### **Strategy for Ensuring Compliance**

CoC and ESG funded service providers will be monitored annually by Lee County to ensure compliance with the standards and laws listed above. The monitoring will ensure that appropriate discharge policies, procedures, and practices have been developed and implemented. The monitoring report will include any findings or concerns related to discharge planning.

### **SYSTEM PERFORMANCE**

A critical aspect of the McKinney-Vento Homeless Assistance Act, (the "Act") as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this

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perspective the Act now requires communities to measure their performance as a coordinated system in addition to analyzing performance by specific projects or project types.

With the 2016 CoC funding round, HUD introduced a series of system performance measures requiring each CoC to provide reporting that aggregates data from each individual program in response to a series of performance based elements describing the efficacy of the CoC. To this end, the Act established a set of criteria for HUD to use that require all CoCs to report their system-level performance to HUD. The intent of this criteria or "system performance measures, is to encourage CoCs and ESG program recipients, as well as all other homeless assistance stakeholders in the CoC, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD.

The following provides the resulting system performance measures that each program—emergency, rapid rehousing, transitional and permanent housing—will similarly be measured, as applicable to program type.

	RELEVANT PROJECT TYPE*					SYSTEM PERFORMANCE MEASURES and CoC GOALS
	SO	ES	RRH	TH	PH	
1a		X	X	X	X	<b>Length of Time Persons Remain Homeless</b> <ul style="list-style-type: none"> <li>Average length of time homeless persons in ES and SH. <b>Goal: &lt;116</b></li> <li>Average length of time homeless persons in ES, SH, and TH. <b>Goal: &lt;123</b></li> </ul>
2		X	X	X	X	<b>Returns to Homelessness</b> Measurement of clients exiting from any project type to a permanent housing destination in the date range two years prior to the production of the system performance report as follows: <ul style="list-style-type: none"> <li>Percentage of those exiting from ES who returned to homelessness. <b>Goal: &lt;30%</b></li> <li>Percentage of those exiting from TH returning to homelessness. <b>Goal: &lt;30%</b></li> <li>Percentage of those exiting from PH returning to homelessness. <b>Goal: &lt;30%</b></li> </ul>
3		X	X			<b>Number of Homeless Persons</b> Measurement of the change in the CoC's total annual count of sheltered ES and TH homeless persons in HMIS. This metric only has relevance in the aggregate, as such, individual projects are not expected to use this measure.
4			X	X	X	<b>Employment and Income Growth for Persons in CoC Programs during the reporting period</b> <ul style="list-style-type: none"> <li>Measurement of the percentage of adults (among stayers) who increased their earned income. <b>Goal: 45%</b></li> <li>Measurement of the percentage of adult stayers who increased their non-employment cash income. <b>Goal: 45%</b></li> <li>Measurement of the percentage of adult stayers who increased their total income. <b>Goal: 45%</b></li> <li>Measurement of the percentage of adults (among leavers) who increased their earned income. <b>Goal: 45%</b></li> <li>Measurement of the percentage of adult leavers who increased their non-employment cash income. <b>Goal: 45%</b></li> <li>Measurement of the percentage of adult leavers who increased their total income. <b>Goal: 45%</b></li> </ul>
5		X	X	X	X	<b>Number of Persons who Become Homeless for the First Time</b> <ul style="list-style-type: none"> <li>Change in number of active participants in ES and TH projects who were not previously enrolled in HMIS. <b>Goal: &lt;200</b></li> <li>Change in number of persons entering ES, TH and PH with no prior enrollment in HMIS. <b>Goal: &lt;200</b></li> </ul>
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7	X	X	X	X	<p><b>Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing.</b></p> <ul style="list-style-type: none"> <li>• Measurement of the change in exits to permanent housing destinations. <b>Goal: &gt;65%</b></li> <li>• Measurement of the change in exits or retention of permanent housing from ES, SH, TH, and PH-RRH. <b>Goal: &gt;65%</b></li> </ul>
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Whereas system performance measures are intended to provide a snapshot into the homeless response system as an entire coordinated initiative, project performance measures takes a closer look at each project within the CoC. The standards provided below establish the performance standards set by this CoC in assessing and evaluating each project's performance, individually. On May 10, 2017, the CoC Governing Board established the following performance targets for all CoC and ESG funded projects:

1. 65% of persons in ES,SH, TH, or PH-RRH should be exited to permanent housing destinations
2. 45% of persons in CoC and ESG funded programs should maintain OR increase their income
3. No more than 35% of persons who were exited from CoC and ESG funded programs should return to homelessness within 1 year

#### APPEAL PROCESS

The CoC Written Standards outline that the most severe service needs will be determined by the household's Coordinated Assessment and VI-SPDAT, and will prioritize those with the highest scores within each category first. In the event that two or more homeless households within the same geographic area are identically prioritized for referral to the next available unit, and each household is also eligible for referral to that unit, the household that first presented for assistance will be referred to the next available unit. In the event that an individuals or family wishes to appeal a coordinated entry score, they shall make an appeal to the Lee County Human and Veteran Services using the Applicant/Client Appeal and Grievance Policy. Appeals for program denial shall be made directly to the agency which conducts such program, according to the agencies appeal or grievance policy.

Staff administering assessments and/or the staff supervisor should address any client complaints, whether discrimination based or not, as best as they can in the moment. Complaints that should be addressed directly by the assessment staff member or assessment staff supervisor include complaints about how they were treated by assessment staff, assessment center conditions, or violation of data agreements. Any other complaints should be referred to the chair of the BNL Committee for resolution as above. Any complaints filed by a client should note their name and contact information so they can be contact by the chair.

## **ATTACHMENT 1**

### **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

#### **EMERGENCY TRANSFERS**

Lee County and other local CoC, HOME or ESG funded housing providers are concerned about the safety of our tenants and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Lee County along with other applicable housing providers allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of Lee County and other applicable housing providers to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether Lee County or other applicable housing providers has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that ensures that the rapid re-housing, tenant based rental assistance, and all other CoC, ESG, and HOME funded rental assistance programs are in compliance with VAWA.

#### **ELIGIBILITY FOR EMERGENCY TRANSFERS**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

#### **EMERGENCY TRANSFER REQUEST DOCUMENTATION**

To request an emergency transfer, the tenant shall notify Lee County or other applicable housing provider's management office and submit a written request for a transfer to the assigned case manager. Tenant may, but is not required, to use the Emergency Transfer Request form provided in the attached Appendix C. Lee County and other applicable housing providers will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under Lee County or other applicable housing provider's program; **OR**
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90- calendar-day period preceding the tenant's request for an emergency transfer.

**CONFIDENTIALITY**

Lee County and other applicable housing providers will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives Lee County and other applicable housing providers written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act. For All Tenants, Lee County and other applicable housing providers are responsible to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

**EMERGENCY TRANSFER TIMING AND AVAILABILITY**

Lee County or other applicable housing providers cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Lee County or other applicable housing providers will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. Lee County or other applicable housing provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If Lee County or other applicable housing providers have no safe and available units for which a tenant who needs an emergency transfer is eligible, Lee County or other applicable housing providers will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, Lee County or other applicable housing providers will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

**SAFETY AND SECURITY OF TENANTS**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1- 800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1- 800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohr.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at [https:// www.victimsofcrime.org/our-programs/ stalking-resource-center](https://www.victimsofcrime.org/our-programs/stalking-resource-center).

**APPENDIX TABLE**

Appendix A	Notice of Occupancy Rights under the Violence Against Women Act
Appendix B	Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
Appendix C	Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking



# APPENDIX A

## LEE COUNTY CONTINUUM OF CARE LEE COUNTY HUMAN AND VETERAN SERVICES

### Notice of Occupancy Rights under the Violence Against Women Act

To all Tenants and Applicants The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that the Rapid Re-Housing, Tenant Based Rental Assistance, and all other CoC, ESG, and HOME rental assistance programs are in compliance with VAWA. This notice explains your rights under VAWA.

***A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.***

#### Protections for Applicants

If you otherwise qualify for assistance under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

#### Protections for Tenants

If you are receiving assistance under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

#### Removing the Abuser or Perpetrator From the Household

Lee County or any other CoC or ESG funded housing provider may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If Lee County or any other CoC or ESG funded housing provider chooses to remove the abuser or perpetrator, Lee County or any other CoC or ESG funded housing provider may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, Lee County or any other CoC or ESG funded housing provider must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, Lee County or any other CoC or ESG funded housing provider must follow Federal, State, and local eviction procedures. In order to divide a lease, Lee County or any other CoC or ESG funded housing provider may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

#### Moving to Another Unit

Upon your request, Lee County or any other CoC or ESG funded housing provider may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, Lee County or any other CoC or ESG funded housing provider may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** *(If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.)* **AND**
- (2) You expressly request the emergency transfer.** *(Your housing provider may choose to require that you submit a form, or may accept another written or oral request.)* **AND**

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**(3a) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** *(This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.)*

**OR**

**(3b) You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer.** *(If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.)*

Lee County or any other CoC or ESG funded housing provider will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

Lee County or any other CoC or ESG funded housing provider's emergency transfer plan provides further information on emergency transfers, and Lee County or any other CoC or ESG funded housing provider must make a copy of its emergency transfer plan available to you if you ask to see it.

### Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

Lee County or any other CoC or ESG funded housing provider can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from Lee County or any other CoC or ESG funded housing provider must be in writing, and Lee County or any other CoC or ESG funded housing provider must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. Lee County or any other CoC or ESG funded housing provider may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to Lee County or any other CoC or ESG funded housing provider as documentation. It is your choice which of the following to submit if Lee County or any other CoC or ESG funded housing provider asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

1. A complete HUD-approved certification form given to you by Lee County or any other CoC or ESG funded housing provider with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
3. A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
4. Any other statement or evidence that Lee County or any other CoC or ESG funded housing provider has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, Lee County or any other CoC or ESG funded housing provider does not have to provide you with the protections contained in this notice.

If Lee County or any other CoC or ESG funded housing provider receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), Lee County or any other CoC or ESG funded housing provider has the right to request that you provide third-party documentation within thirty (30) calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, Lee County or any other CoC or ESG funded housing provider does not have to provide you with the protections contained in this notice.

### Confidentiality

Lee County or any other CoC or ESG funded housing provider must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

Lee County or any other CoC or ESG funded housing provider must not allow any individual administering assistance or other services on behalf of Lee County or any other CoC or ESG funded housing provider (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

Lee County or any other CoC or ESG funded housing provider must not enter your information into any shared database or disclose your information to any other entity or individual. Lee County or any other CoC or ESG funded housing provider, however, may disclose the information provided if:

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1. You give written permission to Lee County or any other CoC or ESG funded housing provider to release the information on a time limited basis.
2. Lee County or any other CoC or ESG funded housing provider needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
3. A law requires Lee County or any other CoC or ESG funded housing provider or your landlord to release the information.

VAWA does not limit Lee County or any other CoC or ESG funded housing provider's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

### Reasons a Tenant Eligible for Occupancy Rights Under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, Lee County or any other CoC or ESG funded housing provider cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if Lee County or any other CoC or ESG funded housing provider can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If Lee County or any other CoC or ESG funded housing provider can demonstrate the above, Lee County or any other CoC or ESG funded housing provider should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

### Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

### Non-Compliance With The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with HUD Miami Field Office, Brickell Plaza Federal Building, 909 SE First Ave, Room 500, Miami, FL 33131-3028, Phone: 350-536-5678, Fax: 350-536-5765.

### Additional Information

You may view a copy of HUD's final VAWA rule at:

<https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>.

Additionally, Lee County or any other CoC or ESG funded housing provider must make a copy of HUD's VAWA regulations available to you upon request. For questions regarding VAWA or to request a copy of the regulation, please contact Jeannie Sutton, Grants Coordinator, Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901, Phone: 239-533-7958, Fax: 239-533-7960, E-mail: [jsutton@leegov.com](mailto:jsutton@leegov.com).

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding an abusive relationship, sexual assault or stalking, you may also contact Abuse Counseling & Treatment's 24-Hour Hotline at 239-939-3112.

## APPENDIX B

### Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

**Purpose of Form:** The Violence Against Women Reauthorization Act of 2013 ("VAWA") protects qualified tenants, participants, and applicants, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, or stalking from being denied housing assistance, evicted, or terminated from housing assistance based on acts of such violence against them.

**Use of Form:** This is an optional form. A Public Housing Authority (PHA), owner or manager presented with a claim for continued or initial tenancy or assistance based on status as a victim of domestic violence, dating violence, sexual assault, or stalking (herein referred to as "Victim") has the option to request that the victim document or provide written evidence to demonstrate that the violence occurred. The

Victim has the option of either submitting this form or submitting third-party documentation, such as:

- (1) A record of a Federal, State, tribal, territorial, or local law enforcement agency (e.g. police), court, or administrative agency; or
- (2) Documentation signed by the Victim and signed by an employee, agent or volunteer of a victim service provider, an attorney, a medical professional, or a mental health professional from whom the Victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, in which the professional attests under penalty of perjury (28 U.S.C. 1746) that he or she believes that the incident of domestic violence, dating violence, sexual assault, or stalking is grounds for protection under 24 Code of Federal Regulations (CFR) § 5.2005 or 24 CFR § 5.2009.

If this form is used by the Victim, the Victim must complete and submit it within 14 business days of receiving it from the PHA, owner or manager. This form must be returned to the person and address specified in the written request for the certification. If the Victim does not complete and return this form (or provide third-party verification) by the 14th business day or by an extension of the date provided by the PHA, manager or owner, the Victim cannot be assured s/he will receive VAWA protections.

If the Victim submits this form or third-party documentation as listed above, the PHA, owner or manager cannot require any additional evidence from the Victim.

**Confidentiality:** All information provided to a PHA, owner or manager concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking relating to the Victim (including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking) shall be kept confidential by the PHA, owner or manager, and such information shall not be entered into any shared database. Employees of the PHA, owner, or manager are not to have access to these details unless to afford or reject VAWA protections to the Victim; and may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) requested or consented to by the Victim in writing; (ii) required for use in an eviction proceeding; or (iii) otherwise required by applicable law.



**APPENDIX B**

**TO BE COMPLETED BY THE VICTIM OF DOMESTIC VIOLENCE,  
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING:**

Date Written Request Received by Victim: \_\_\_\_\_

Name of Victim: \_\_\_\_\_

Names of Other Family Members Listed on the Lease: \_\_\_\_\_

Name of the Perpetrator\*: \_\_\_\_\_

**\*Note:** The Victim is required to provide the name of the perpetrator only if the name of the perpetrator is safe to provide, and is known to the victim.

Perpetrator's Relationship to Victim: \_\_\_\_\_

Date(s), time(s), and location(s) of the incident(s) of Domestic Violence, Dating Violence, Sexual Assault, or Stalking Occurred: \_\_\_\_\_

\_\_\_\_\_

Description of Incident(s) (This description may be used by the PHA, owner or manager for purposes of evicting the perpetrator. Please be as descriptive as possible.):


I hereby certify that the information that I have provided is true and correct and I believe that, based on the information I have provided, that I am a victim of domestic violence, dating violence, sexual assault or stalking. I acknowledge that submission of false information is a basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Executed on (Date) \_\_\_\_\_

*Information provided is to be used by PHAs and Section 8 owners or managers to request a tenant to certify that the individual is a victim of domestic violence, dating violence or stalking. The information is subject to the confidentiality requirements of the HUD Reform Legislation. This agency may not collect this information, and you are not required to complete this form.*

Lee County Continuum of Care Writen Standards and Coordinated Entry Policies and Procedures  
Last Updated: October 1, 2017 Revision: Original



## APPENDIX C

### **Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

**Purpose of Form:** If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

**The requirements you must meet are:**

**(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Appendix B – Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD50098), or any one of the other types of documentation listed on that Form.

**(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer.** Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

**(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future. **OR**

**You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer.** If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

**Submission of Documentation:** If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.



TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting and emergency transfer: \_\_\_\_\_
2. Your name (if different from victim's): \_\_\_\_\_
3. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_  
\_\_\_\_\_
4. Name(s) of other family member(s) who would transfer with the victim: \_\_\_\_\_  
\_\_\_\_\_
5. Address of location from which the victim seeks to transfer: \_\_\_\_\_  
\_\_\_\_\_
6. Victim's phone number: \_\_\_\_\_
7. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_  
\_\_\_\_\_
8. Relationship of the accused perpetrator to the victim: \_\_\_\_\_
9. Date(s), time(s), and location(s) of the incident(s): \_\_\_\_\_  
\_\_\_\_\_
10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking transfer?  NO  YES *If yes, skip question 11.*
11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
12. If voluntarily provided, list any third-party documentation you are providing along with this notice:  
\_\_\_\_\_

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination or assistance, or eviction.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



Grantee SF-424's and Certification(s)

OMB Number: 4840-0004  
 Expiration Date: 10/31/2019

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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Reviser, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: 12/11/2018		4. Applicant Identifier: <input type="text"/>
5a. Federal Entity Identifier: K-18-FC-11-C210		5b. Federal Award Identifier: 12097
State Use Only:		
5. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
<b>B. APPLICANT INFORMATION:</b>		
* 6. Legal Name: Lee County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 54-5000702		* c. Organizational DUNS: 0134616210900
d. Address:		
* Street1: 2115 Second St.		
Street2: <input type="text"/>		
* City: Fort Myers		
County/Parish: <input type="text"/>		
* State: Fla Florida		
Province: <input type="text"/>		
* Country: USA, UNITED STATES		
* Zip / Postal Code: 33901		
e. Organizational Unit:		
Department Name: Human and Veteran Services		Division Name: <input type="text"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Jennifer	<input type="text"/>
Middle Name: <input type="text"/>		
* Last Name: Williams	<input type="text"/>	
Suffix: <input type="text"/>		
Title: Grants Coordinator		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 239-533-1958		Fax Number: 239-533-1950
* Email: jwilliam@lee.gov		

080718R  
 C-18

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type:	
<input type="text" value="B: County Government"/>	
Type of Applicant 2: Select Applicant Type:	
<input type="text"/>	
Type of Applicant 3: Select Applicant Type:	
<input type="text"/>	
* Other (specify):	
<input type="text"/>	
* 10. Name of Federal Agency:	
<input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number:	
<input type="text" value="14.235"/>	
CFDA ID#:	
<input type="text"/>	
* 12. Funding Opportunity Number:	
<input type="text" value="0/1"/>	
* Title:	
<input type="text" value="This is not a Federal competition, but rather the renewal of entitlement funding to an urban county."/>	
13. Competition Identification Number:	
<input type="text"/>	
Title:	
<input type="text"/>	
14. Areas Affected by Project (CITIES, Counties, States, etc.):	
<input type="text"/>	<input type="button" value="Add Affected Area"/> <input type="button" value="Delete Affected Area"/> <input type="button" value="New Affected Area"/>
* 16. Descriptive Title of Applicant's Project:	
<input type="text" value="Lee County 2018 Annual Action Plan."/>	
Attach supporting documents as specified in agency instructions.	
<input type="button" value="Add Attachments"/> <input type="button" value="Select Attachments"/> <input type="button" value="New Attachments"/>	

**Application for Federal Assistance SF-424**

16. Congressional Districts Of:  
 \* a. Applicant: 25 \* b. Program/Project: 1C

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

17. Proposed Project:  
 \* a. Start Date: 08/01/2018 \* b. End Date: 09/30/2019

18. Estimated Funding (\$):

* a. Federal	983,519.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	00,000.00
* g. TOTAL	1,083,519.00

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?  
 a. This application was made available to the State under the Executive Order 12372 Process for review on [ ]  
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
 c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment)  
 Yes  No  
 If "Yes," provide explanation and attach

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 28, Section 1002)  
 \*\* I AGREE  
 \*\* The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: [ ] \* First Name: Cecil  
 Middle Name: [ ]  
 \* Last Name: Pendergrass  
 Suffix: [ ]

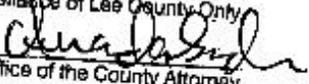
\* Title: Chair, Board of County Commissioners

\* Telephone Number: 238-523-2227 Fax Number: 238-485-1021

\* Email: [ ]

\* Signature of Authorized Representative:  \* Date Signed: 8-7-18

Commissioner Cecil J. Pendergrass  
 Lee County Board of County Commissioners  
 District 2

Approved as to Form for the  
Release of Lee County Only  
  
Office of the County Attorney

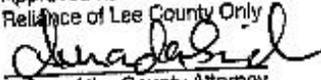
Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* 3. Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 5. Date Received: 08/27/2018	4. Applicant Contact: _____	
5a. Federal Entity Identifier: 15-DC-12-0013	5b. Federal Award Identifier: 120972	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: Lee County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 05-600700	* c. Organizational DUNS: 013446610000	
d. Address:		
* Street: 2118 Second Street	Street: _____	
* City: Fort Myers	City: _____	
County/Parish: _____	County/Parish: _____	
* State: FL: Florida	State: _____	
Province: _____	Province: _____	
* Country: USA: UNITED STATES	Country: _____	
* Zip / Postal Code: 33901	Zip / Postal Code: _____	
e. Organizational Unit:		
Department Name: Economic and Veterans Services	Division Name: _____	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Jeanette	Middle Name: _____
* Last Name: Sutton	Suffix: _____	
Title: Grants Coord. Asst.		
Organizational Affiliation: _____		
* Telephone Number: 239-532-7958	Fax Number: 239-533-7960	
* Email: jsutton@leegov.com		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="5: County Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/>	
<b>CFDA Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="N/A"/>	
<b>* Title:</b> <input type="text" value="This is not a federal competition, but rather the renewal of institutional funding to an urban county."/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text" value=""/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Lee County 2018 Annual Action Plan"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Cancel"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="13"/>	* b. Program/Project: <input type="text" value="13"/>
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 Attachments"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="10/01/2018"/>	* b. End Date: <input type="text" value="09/30/2019"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="3,000,725.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="50,000.00"/>
* g. TOTAL	<input type="text" value="3,050,725.00"/>
* 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="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
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 28, 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:	
Print:	<input type="text" value="Lee"/> * First Name: <input type="text" value="Doreen"/>
Middle Name:	<input type="text"/>
* Last Name:	<input type="text" value="Dondoregians"/>
Suffix:	<input type="text"/>
* Title:	<input type="text" value="Chief, Board of County Commissioners"/>
* Telephone Number: <input type="text" value="251-533-2227"/>	Fax Number: <input type="text" value="251-685-2021"/>
* Email: <input type="text" value="dist2@lccgov.com"/>	
* Signature of Authorized Representative:	* Date Signed: <input type="text" value="8-2-18"/>

Commissioner: Cecil L. Pendergrass  
 Lee County Board of County Commissioners  
 District 2

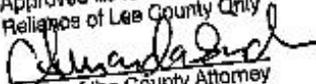
Approved as to Form for the  
Reliance of Lee County Only

  
Office of the County Attorney

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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision
		* If Revision, select appropriate letter(s): <input type="text"/> * 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"/>		
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text"/> Lee County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/> 59-8050702		* c. Organizational OUNS: <input type="text"/> C134516110090
<b>d. Address:</b>		
* Street: <input type="text"/> 2115 Second Street * City: <input type="text"/> Fort Myers * State: <input type="text"/> FL: Florida * Zip / Postal Code: <input type="text"/> 33901		
<b>e. Organizational Unit:</b>		
Department Name: <input type="text"/> Human and Veterans Services		Division Name: <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text"/> Mr. * First Name: <input type="text"/> Jeanie * Last Name: <input type="text"/> Sutton Title: <input type="text"/> Grants Coordinator Telephone Number: <input type="text"/> 239-523-7958      Fax Number: <input type="text"/> 239-523-7960 * Email: <input type="text"/> j.sutton@leegov.com		

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <p>Is: County Government</p> <p>Type of Applicant 2: Select Applicant Type</p> <p>Type of Applicant 3: Select Applicant Type</p> <p>* Other (specify):</p>	
<p><b>* 10. Name of Federal Agency:</b></p> <p>U.S. Department of Housing and Urban Development</p>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <p>4.931</p> <p>CFDA Title:</p>	
<p><b>* 12. Funding Opportunity Number:</b></p> <p>N/A</p> <p>* Title:</p> <p>This is not a Federal competition, but rather the renewal of entitlement funding to an urban county.</p>	
<p><b>13. Competition Identification Number:</b></p> <p>Title:</p>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <p>Add Attachment</p>	
<p><b>* 15. Description Title of Applicant's Project:</b></p> <p>New County 2018 Annual Action Plan.</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachment</p>	



Approved as to Form for the  
Reliance of Lee County Only  
  
Office of the County Attorney

**CERTIFICATIONS**

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

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

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

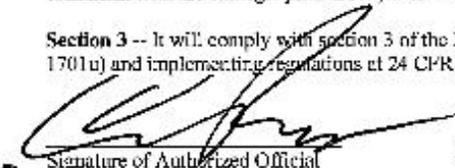
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

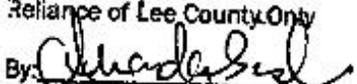
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the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

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

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

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

  
 Signature of Authorized Official 8-7-18  
 Date  
 Commissioner Cecil L. Pendergrass  
 Lee County Board of County Commissioners  
 District 7  
 Title

Approved as to Form for the  
 Reliance of Lee County Only  
 By:   
 Office of the County Attorney

08/07/18  
 C-18

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

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

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

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

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

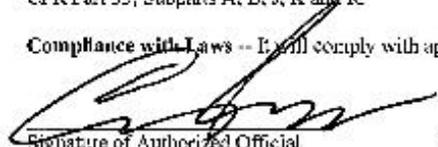
**Excessive Force** -- It has adopted and is enforcing:

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

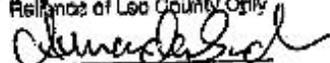
**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000c) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

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

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

  
Signature of Authorized Official      Date 8-7-18

*Chair* Commissioner Cecl L. Pendergrass  
Lee County Board of County Commissioners  
Title District 2

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Office of the County Attorney

**OPTIONAL Community Development Block Grant Certification**

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

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

Not Applicable  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title



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### **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

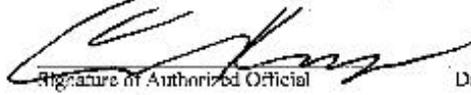
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

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

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

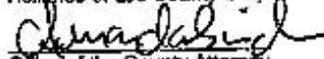
**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

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

 8-2018  
Signature of Authorized Official Date

Chair  
Title  
Commissioner Cecil L. Pendergrass  
Lee County Board of County Commissioners  
District 2

Approved as to Form for the  
Reliance of Lee County Only

  
Office of the County Attorney

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**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

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

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

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

Not Applicable  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

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