

Actions: Homeowner education and financial counseling, foreclosure prevention

Strategy: Maximize the use of Section 8 homeownership option by public housing authorities

Objective and Outcome: - Decent Housing and Affordability: Develop or rehabilitate single and multifamily homeownership properties that utilize Section 8 for homeownership.

Actions: Non-profit housing and private development, Section 8 homeownership

Strategy: Support projects with employer assisted home ownership programs

Objective and Outcome - Decent Housing and Affordability: Develop or increase home ownership opportunities that serve employees of Vermont based businesses

Actions: Down payment and/or closing costs, partner with Vermont based businesses

Strategy: Redevelop foreclosed properties for home ownership

Objective and Outcomes – Decent Housing and Availability: Rehabilitate and re-develop underutilized, foreclosed properties to increase home ownership opportunities.

Actions: Non-profit housing organizations, acquisition, rehabilitation, major and minor rehabilitation.

Strategy: Promote the development of home-ownership units designed and built to a level of energy efficiency that meets or exceeds the levels required to qualify for the Energy Star label.

Objective and Outcomes – Decent Housing and Sustainability: All new housing developed will meet or exceed the Energy Star rating.

Actions: Non-profit housing development, private housing development

Strategy: Promote the development of home-ownership units that include a shared equity appreciation covenant.

Objective and Outcome - Decent Housing and Affordability: Develop or increase home ownership opportunities that include a shared equity appreciation model to ensure long term affordability of the housing.

Actions: Non-profit housing development, private housing development

Objective – Expand Economic Opportunity

To accomplish the objective of expanding economic opportunity, the state of Vermont has developed strategies to encourage activities which create or retain jobs accessible to lower income persons; provide access to credit for community development that promotes long-term economic and social viability; and empower lower income persons to achieve self-sufficiency in federally-assisted and public housing.

Vermont has enjoyed less unemployment than the nation generally however pockets of unemployment and poverty exist especially in the Northeast Kingdom and Rutland County. The State is committed to providing Vermonters with the best possible mix of employment opportunities in order to increase the average wage in Vermont, maintain low unemployment rate and to provide job opportunities to young Vermonters entering the workforce.

The State's Specific Objectives with respect to Expanding Economic Opportunity and the Strategies and Actions planned to achieve them under the Consolidated Plan are:

Goal – Job Creation and Retention

The highest priority for the use of VCDP assistance for economic development activities through this plan will be focused on retaining and creating jobs, striving for the best quality jobs

attainable lower income individuals. To support this priority, the state will assist businesses that create and retain jobs through a variety of activities including technical assistance, low interest loans for commercial acquisition and rehabilitation, telecommunications infrastructure and entrepreneurial training. The State's strategies for Economic Development are as follows:

Strategy: Invest in business facilities, including broadband and wireless access, energy efficiency improvements, machinery, equipment and other capital requirements

Objective and Outcome – Expand Economic Opportunity and Affordability: Create or retain jobs in existing Vermont based companies by providing low interest loans for capital improvements.

Objective and Outcome - Expand Economic Opportunity and Affordability: Create jobs in newly established Vermont based companies by providing low interest loans for capital improvements.

Actions: Loans

Strategy: Invest in businesses that acquire, improve and occupy otherwise underutilized or vacant industrial property.

Objective and Outcome – Expand Economic Opportunity and Availability: Create jobs in Vermont based companies by providing loans for the purchase of underutilized or vacant property with consideration to projects that locate in communities that currently have underutilized septic, sewer and water capacity.

Actions: Loans

Strategy: Develop small businesses, foster entrepreneurship, and compliment but not duplicate other small business programs;

Objective and Outcome – Expand Economic Opportunity and Availability: Create or retain jobs in small or micro businesses.

Actions: Loans, grants, technical assistance

Strategy: Invest in companies that meet the priorities established in the regional Comprehensive Economic Development Strategies (“CEDS”) where they exist and that contribute to cluster success, offer diversity to local economies and/or otherwise complement the mix of existing industries.

Objective and Outcome - Expand Economic Opportunity and Availability: Create or retain jobs in businesses located in communities with regional CEDS.

Actions: Loans

Strategy: Invest in businesses that use the Vermont Training Program and other job training programs offered by the Vermont Department of Labor; make business investments that might integrate with or capitalize on those resources, but do not replicate them

Objective and Outcome - Expand Economic Opportunity and Availability: Create or retain jobs in businesses with consideration given to projects that utilize the Vermont Training program or that leverage other job training resources.

Actions: Loans, technical assistance

Strategy: Support initiatives, projects and business investments that contribute to the availability of childcare for employee families.

Objective and Outcome - Expand Economic Opportunity and Availability: Create or retain jobs in businesses that provide access to or assistance obtaining affordable childcare.

Actions: Loans, grants

Objective – Suitable Living Environment

While not the highest priority of the consolidated plan, The State of Vermont encourages activities which improve the safety and livability of neighborhoods and communities; increase access to quality facilities and services; reduce the isolation of income groups by providing housing opportunities in mixed income settings; revitalize communities; and restore, enhance, and preserve natural and physical features of special value for historic, architectural or aesthetic reasons; and conserve energy resources.

The State's Specific Objectives related to Creating a Suitable Living Environment and the Strategies and Actions planned to achieve them under the Consolidated Plan are:

Goal: Downtown Preservation and Revitalization

A "Downtown" is the traditional central business district of a community, characterized by a cohesive core of multi-storied commercial buildings, often interspersed with civic, religious, and residential buildings and public spaces, arranged along a main street and intersecting side streets with public infrastructure in place, that have served as the center for socio-economic interaction in the community.

With respect to State assistance and funding including CDBG, the State statute requires that priority consideration be given to development and growth in Designated Downtowns, Village Centers, Growth Centers, Vermont Neighborhoods and New Town Centers. Within those areas, statute specifies that the highest priority is to facilitate development in designated downtowns and village centers first – consistent with the state's historic development pattern – but where that is not possible to then give priority consideration to Designated Growth Centers, New Town Centers, and Vermont Neighborhoods.

Strategy: Promote projects in Designated Downtowns and Village Centers, Growth Centers, Vermont Neighborhoods and New Town Centers

Objective and Outcome - Suitable Living Environment and Sustainability: Support the creation of public facilities and services that primarily serve lower income people.

Actions: Major and minor rehabilitation of underutilized or vacant properties, municipal and non-profit partnerships, senior and childcare centers, health and wellness services

Strategy: Participate in projects that leverage other state and federal programs such as tax credits and transportation grants in order to promote public and private investment in downtown areas;

Objective and Outcome - Suitable Living Environment and Sustainability: Improve public facilities or access to public services with consideration for projects that improve public infrastructure through the support of other funding sources.

Actions: Major and minor rehabilitation of underutilized or vacant properties, municipal and non-profit partnerships, senior and childcare centers, health and wellness services

Strategy: Address training and technical assistance needs for downtown organizations and their municipal partners

Objective and Outcome - Suitable Living Environment and Sustainability: Support initiatives that increase access to public facilities and services that serve primarily lower income people in Designated Downtowns and Village Centers.

Actions: Technical assistance, planning

Strategy: Reinvest in downtown properties, particularly in the upper stories including elevators, sprinklers, and other code-related improvements.

Objective and Outcome - Suitable Living Environment and Sustainability: Improve public facilities with consideration for projects that redevelop underutilized or vacant properties.

Actions: Loans, grants, non-profit and private development

Strategy: Promote projects in Designated Downtowns that are also area wide low and moderate income benefit communities with façade, streetscape and other infrastructure improvements.

Objective and Outcome - Suitable Living Environment and Sustainability: Improve public infrastructure in communities where the majority of residents are considered at or below 80% of median income.

Actions: Streetscape and façade improvements, other infrastructure improvements, technical assistance, loans and grants

Goal - Remediate and Reuse Brownfields

The VCDP will continue to provide for brownfield remediation and reuse as an important community development objective under the slums and blight criteria. It should be noted that other primary sources of brownfield funding are available and must be sought prior to application to the VCDP. In addition to all other applicable program requirements, all brownfield projects must result in the reuse and occupation of the brownfield property within two years of receiving VCDP assistance.

Strategy: Redevelop Brownfields into productive use

Objective and Outcome - Suitable Living Environment and Sustainability: Redevelop contaminated sites to fulfill consolidated plan priorities related to housing, economic development, public facilities and public services.

Actions: Site identification, assessment, mitigation plan, technical assistance, loans, grants

Goal – Increase Access to Public Facilities

While not the highest priority for VCDP funding, VCDP will continue to encourage public facility applications for community facility projects that are located in Designated Downtowns and Village Centers, Vermont Neighborhoods, Growth Centers, and New Town Centers; or that provide infrastructure for the creation and/or retention of jobs and housing units; or that remove barriers to accessibility by people with physical disabilities.

Strategy: Municipal projects to remove barriers to public buildings

Objective and Outcome – Suitable Living Environment and Accessibility: Rehabilitate municipally owned public facilities to bring them into compliance with current ADA standards.

Actions: Grants, major and minor rehabilitation, public access

Strategy: Remove barriers to accessibility for places of business and/or residential facilities

Objective and Outcome - Suitable Living Environment and Accessibility: Rehabilitate housing units that serve primarily lower income people, to bring the property into compliance with current ADA standards.

Objective and Outcome - Suitable Living Environment and Accessibility: Rehabilitate non-housing units that provide services to or employ primarily lower income people, to bring the property into compliance with current ADA standards.

Actions: Loans and grants, major and minor rehabilitation, technical assistance

Strategy: Promote facilities that stabilize living environments and enhance quality of live for families and individuals.

Objective and Outcome - Suitable Living Environment and Availability: Increase access to childcare for lower income families with consideration given for projects that address the need for second and third shift care.

Objective and Outcome - Suitable Living Environment and Availability: Increase access to adult care for lower income families, seniors and people with disabilities.

Objective and Outcome - Suitable Living Environment and Availability: Increase access to health care facilities that serve primarily lower income families, seniors and people with disabilities.

Actions: Non-profit service providers for youth and adults, community health care, new construction, major and minor rehabilitation

Goal – Increase Access to Public Services

While not the highest priority for VCDP funding, the VCDP will continue to encourage public service applications that support projects located in Designated Downtowns and Village Centers, Vermont Neighborhoods, Growth Centers, and New Town Centers; provide services that support job creation and/or retention, or that support family self sufficiency; provide services that support housing; or that provide services to persons with special needs. The following activities relate to this objective:

Strategy: Provide access to affordable capital and counseling-based lending for lower income entrepreneurs or potential home-owners.

Objective and Outcome - Create Economic Opportunity and Availability: Help individuals' access educational programs and financial counseling and support that emphasize homeownership or small business start-up.

Actions: Non-profit community service providers, financial and business counseling, grants, technical assistance

Strategy: Provide services that stabilize living environments and enhance quality of live for families and individuals.

Objective and Outcome - Suitable Living Environment and Availability: Increase access to childcare that makes jobs more available for family members.

Actions: Technical assistance, childcare programming

Objective and Outcome - Suitable Living Environment and Availability: Increase access to community care facilities, adult day programs or other services that address the needs of primarily lower income seniors or people with disabilities.

Actions: Technical assistance, adult care programs

Objective and Outcome - Suitable Living Environment and Availability: Help residents remain housed and living independently.

Actions: Home sharing, accessibility modifications, home-based services for seniors or people with disabilities

Strategy: Increase access to work force development and job training for low and moderate income job seekers.

Objective and Outcome – Create Economic Opportunity and Availability: Low and moderate income individuals gain the skills and knowledge to obtain employment.

Actions: Link job training to housing and economic development projects, nonprofit or employer based.

Affordable Housing

The 2010 Vermont Housing Needs Assessment showed that a need for approximately 5,000 new rental units between 2009 and 2014, which would require doubling the rate of production. However, an estimated 12,204 extremely low-income renters with incomes below 30% of median, 8,120 low income, and 6,964 moderate income renter households in Vermont are cost burdened. Many of these households are likely to live in the aging houses that have lead-based paint. For non-elderly and households without a disability, the supply of assisted housing falls far short of the need. However, the number of elderly Vermonters is growing faster than any other age group and it is estimated that by 2014 Vermont will have 23,045 elderly households earning less than 50% of median income.

The 2010 Vermont Housing Needs Assessment also showed a need for approximately 8,000 new homeowner units between 2009 and 2014, also requiring the rate of production to double. That said, the vast majority of low income homeowners with mortgages are cost burdened, and the supply of homes for sale at prices they can afford is limited. Increasing the supply of housing at all price levels would potentially ease the upward pressure on home prices.

Vermont has benefited from aggressive use of Section 8, HUD 202, RD 515 and tax credit financing to build 10,998 apartments in 488 developments in 102 communities across the state. Many of these assets have project-based rental assistance attached to them. Approximately 2,600 apartments will reach the end of Section 8 use agreements or tax credit compliance periods by 2018. In addition Vermont has benefited from smart growth reuse of historic buildings adapting them for reuse as affordable housing. Replacement of this housing stock would be more costly than preservation of the public's investment. The permitting of replacement housing and getting community support for new development can be difficult. The loss of this housing stock would also cause displacement from a number of communities where there are few other options for low income Vermonters. Maintaining the public investment in this stock and bringing it to modern energy, health and safety standards is an important challenge for the State of Vermont. So as the state strives to produce new affordable housing units it must preserve the investments already made in affordable housing over the last 25 years.

The state will strive to provide as many affordable housing units as possible in each year encompassing the 2010-2015 Consolidated Plan through production of new units and rehabilitation of existing units. The reality is the HUD funding provided to Vermont through CDBG and HOME (approximately \$11.9 million a year) is not nearly enough on its own to support even a modest number of affordable housing projects. The number of affordable housing units created or rehabilitated is much more dependent on the investments of Low Income Housing Tax Credits and access to other affordable housing investments.

Annual Housing Completion Goals (HUD Table 3b)

Grantee Name: State of Vermont Program Year: 2011	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	115		X	X		<input type="checkbox"/>
Rehabilitation of existing units	165		X	X	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	280		X	X	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units	5		X	<input type="checkbox"/>		
Rehabilitation of existing units	100		X	<input type="checkbox"/>		
Homebuyer Assistance	25		X	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	130		X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	120		X	X		<input type="checkbox"/>
Rehabilitation of existing units	265		X	X	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance	25		X	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Housing	410		X	X	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC.215)						
Homeless households	20		X	X	<input type="checkbox"/>	<input type="checkbox"/>
...Non-homeless households	410		X	X	<input type="checkbox"/>	<input type="checkbox"/>
...Special needs households	20		X	X	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS						
Annual Rental Housing Goal	280		X	X	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	130		X	X	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	410		X	X	<input type="checkbox"/>	<input type="checkbox"/>

State Priority Housing/Special Needs/Investment Plan Table

Table 2A shows the number of very low, low, and moderate income renters and owners with any housing problem and indicates the State's priority for addressing the unmet need in each category. As shown in Appendix 2 of the 2010 Vermont Housing Needs Assessment the biggest housing problem facing Vermonters is one of affordability.

PART 1. PRIORITY HOUSING NEEDS		Priority Level Indicate High, Medium, Low, checkmark, Yes, No		Unmet Need
Renter	Small Related Families 2-4 members	0-30%	Y	3,352
		31-50%	Y	2,887
		51-80%	Y	1,592
	Large Related Families 5+ members	0-30%	Y	409
		31-50%	Y	570
		51-80%	Y	400
	Elderly Age 65+	0-30%	Y	2,592
		31-50%	Y	1,582
		51-80%	Y	814
	All Other Non family, non elderly	0-30%	Y	4,692
		31-50%	Y	3,620
		51-80%	Y	400
Owner	0-30%	Y	7,768	
	31-50%	Y	9,076	
	51-80%	Y	12,366	
PART 2 PRIORITY SPECIAL NEEDS		Priority Level Indicate High, Medium, Low, checkmark, Yes, No		
Elderly		Y	87,925	
Frail Elderly		Y	3,226	
Severe Mental Illness		Y	26,500	
Developmentally Disabled		Y	13,046	
Physically Disabled		Y	43,500	
Persons w/ Alcohol/Other Drug Addictions		Y	50,727	
Persons w/HIV/AIDS		Y	650	
Victims of Domestic Violence		Y	8,698	
Other		Y	n/a	

2010-2015 Public Housing Strategy

Executive directors of the Winooski Housing Authority and the Vermont State Housing Authority are members of the Department's Consolidated Plan Advisory Group, to ensure that the needs of PHAs are addressed. Additionally, the Commissioner reviews PHA plans that are submitted, to certify the Plans' consistency with the State's Consolidated Plan.

Vermont does not have a State agency administering public housing funds, therefore is not required to describe Public Housing Resident Initiatives.

None of Vermont's ten* PHAs are in troubled status. Many are considered high performing PHAs. In the extremely unlikely event that any PHA in Vermont became in troubled status during this Consolidated Plan, the State would work closely with the troubled PHA to determine the manner that the State would help the PHA to improve its performance.

2011 Action Plan: Actions to Address the Needs of Public Housing

The State does not plan to take any actions this year other than as described above.

*As of January 1, 2011, the Hartford Housing Authority's vouchers were transferred to the Vermont State Housing Authority.

Homeless and Special Needs

Priority Homeless Needs Table

The required Table 1 Continuum of Care Housing Gap Analysis Chart and Homeless Populations and Subpopulations chart are found in Appendix 2 of the 2010 Vermont Housing Needs Assessment.

Helping low income families avoid becoming homeless

- The mission of The Agency of Human Services' (AHS) is, "To improve the health and well being of Vermonters today and tomorrow and to protect those who are unable to protect themselves." Fundamental to our mission is the belief that stable, affordable housing is a cornerstone of an individual's or family's wellbeing. Unfortunately, we have been experiencing the worst economic downturn since the Great Depression. There has been a dramatic increase in the number of homeless persons, and the number of persons at risk of homelessness. The Vermont Interagency Council on Homelessness has been very active planning a response to this crisis.

AHS is using available dollars as flexibly as possible to help prevent homelessness and when it occurs to get people into stable housing as quickly as possible.

2011 Actions

AHS used the ARRA HPRP funds to develop a systemic response to homelessness and homelessness prevention, contracting with local providers to administer the funds and be the main point of contact in the community for persons seeking help with housing. In January 2011, the Governor proposed an additional \$500,000 in State funds to support the state's homeless shelters and provide additional homelessness prevention funds to support HPRP activities in this fiscal year. \$300,000 of this would be distributed to shelters and homelessness prevention programs; and \$200,000 for rental assistance to reduce emergency motel usage.

The Governor will host a Housing Summit, the goal of which will be to agree on solutions to long-standing barriers to ending homelessness in Vermont.

Reaching out to homeless persons

Vermont has provided outreach to homeless persons through its effective network of local agencies including shelters, service agencies and housing providers. From the number of requests for assistance it does not appear that any special outreach is necessary. Persons needing help readily discover how to find it.

The PATH Program – Projects for Assistance in Transition from Homelessness provides assistance to several Vermont organizations to conduct outreach efforts to people experiencing a serious mental illness or co-occurring disorder. PATH is funded by the U.S. Dept. of Health & Human Services.

The Vermont Coalition of Runaway and Homeless Youth Programs include a Street Outreach Program, provided by several organizations, to reach out to homeless and at-risk youth. These programs are funded by the U.S. Dept. of Health & Human Services.

A supportive services only grant to conduct street outreach allows three agencies (drop-in center, shelter, transitional housing and a mental health/substance abuse agency) to coordinate services. This grant is funded through HUD McKinney-Vento's Supportive Housing Program.

Addressing emergency shelter needs

Emergency shelter needs are met in three ways.

First, Vermont has an effective network of local emergency shelters. However, these shelters are full on a regular basis. Some have developed "overflow" capacity. Additional shelter space has been opened including "warming shelters" in Bellows Falls, Brattleboro and Barre. People are staying in shelter longer than in the past due in part to a shortage of rental vouchers. More families and working poor are finding themselves in shelters. The State supports these initiatives with State dollars where possible.

Second, Vermont has a strong relationship with the Veterans Administration's grant per diem program to provide emergency shelter to veterans.

Third, agencies of Vermont's Coalition of Runaway and Homeless Youth Programs provide emergency and transitional housing services to youth through the Runaway and Family Stabilization (ES Safe Homes) and Transitional Living Programs (TH). These programs are funded by the U.S. Dept. of Health & Human Services.

Vermont will pay for motel stays for homeless persons who are in a vulnerable population, including elders, people with disabilities, families with children, and victims of domestic violence.

Vermont is exploring alternatives to emergency motel stays because ultimately they are one of the least efficient or effective solutions to homelessness and lack appropriate supports to address underlying issues which may contribute to homelessness. The state is actively engaged in developing alternative strategies which could be put in place as early as July 2011 to shorten the average length of homelessness and get people into transitional or permanent housing as rapidly as possible.

AHS' goal is to reduce the use of motels by providing improved coordination in the area of prevention, re-housing, case-management to follow participants past lease-up (where required), and a greater variety of housing options such as SROs or transitional units.

2011 Actions

- Maintain the current level of existing emergency shelter beds and support additional "overflow capacity" as necessary
- Improve coordination of homelessness prevention programs around the state.
- Increase the percentage of funding spent on prevention activities and case management
- Continue development of a statewide Homeless Management Information System and tools
- Prioritize families with children for rapid re-housing to avoid long emergency shelter or motel stays

Helping homeless persons transition to permanent housing

- Support creation and maintenance of new housing stock
- Develop strategies to utilize mainstream resources in a coordinated system, such as Medicaid services, SSI, TANF and other supportive service programs while securing permanent housing
- Provide case management for participants

Vermont continues to apply for grant funding to increase the following currently operating HUD permanent housing programs:

- Shelter Plus Care Program provides permanent supportive housing to individuals and families who have a disability and are either homeless or chronically homeless.
- HUD-VASH (HUD Veterans Administration Supportive Housing) permanent housing vouchers to veterans;
- Family Unification Vouchers to families for whom the lack of adequate housing is a primary factor in the separation, or threat of imminent separation, of children from their families or in the prevention of reunifying the children with their families;
- Rental Assistance for non-elderly persons with disabilities;
- Housing Choice Vouchers; and
- HOPWA vouchers for people with AIDS.

Steps to End Chronic Homelessness

The Vermont Interagency Council on Homelessness (VICH) is the body analyzing the problem, discussing solutions and advocating for change. The following activities relate to the VICH plan to end homelessness:

- Continue to make flexible use of state funds to prevent or ameliorate homelessness.
- Fully coordinate and maximize the impact of the likely federal stimulus funding. The VICH is the vehicle for discussion and planning for the use of these funds.
- Continue to refine the information available for determining the nature and scope of homelessness in Vermont, and use that information to plan Vermont's response.
- Refine and improve our collaboration at the local level to make ensure we identify those at risk and use all available funds as efficiently as possible.
- In January 2011, the Governor proposed \$1.7 million in the Governor's FY 11 budget to respond to the end of HPRP funding in FY 12.

The Governor will host a Housing Summit in June 2011, the goal of which will be to agree on solutions to long-standing barriers to ending homelessness in Vermont.

Vermont continues to apply for grant funding to increase the following currently operating HUD permanent housing programs:

- Shelter Plus Care Program provides permanent supportive housing to individuals and families who have a disability and are either homeless or chronically homeless.
- HUD-VASH (HUD Veterans Administration Supportive Housing) permanent housing vouchers to veterans;
- Family Unification Vouchers to families for whom the lack of adequate housing is a primary factor in the separation, or threat of imminent separation, of children from their families or in the prevention of reunifying the children with their families;
- Rental Assistance for non-elderly persons with disabilities;
- Housing Choice Vouchers; and

- HOPWA vouchers for people with AIDS.

2011 Action Plan: Special needs of persons who are not homeless

Vermont has long-standing efforts to address supportive housing for people with special needs including elders, persons with disabilities, and persons with addictions. These efforts will be continued and, in a number of instances, expanded.

AHS has developed the AHS Housing Task Force to ensure funds for housing or supportive services are fully coordinated, and that requests for housing development or funding are prioritized by the Agency instead of having different programs pursuing different projects. This Task Force has already made a very big difference ensuring that every available dollar is spent wisely.

The above programs (S+C and the “housing first” provider in Vermont, Pathways to Housing VT) have basic eligibility that requires participants come from a place of homelessness, and the vast majority of housing utilized by PTH is S+C. In February of 2011 Vermont CARES became a new Shelter Plus Care sponsor agency with locations in St. Johnsbury, Rutland, and Montpelier.

The Department of Mental Health, with its community providers, continues to provide and expand a wide range of housing options with supportive services.

The Department of Disabilities, Aging and Independent Living continue to look for opportunities to develop service enriched housing, such as assisted living, for elders and adults with disabilities, to avoid institutional placements.

The Department of Corrections and Division of Drug and Alcohol Treatment continue to develop additional housing with supportive services options for released offenders who require drug and alcohol treatment.

The Department of Corrections is working more closely with the rest of AHS to develop detailed release planning for persons with disabilities who are incarcerated. There is now a State Interagency Team to review those cases. One of the major obstacles is lack of suitable housing. The team has been able to develop flexible approaches to solve this issue in many cases.

Housing development to serve these populations is given priority not only at AHS but with the housing funding agencies.

Vermont does not plan to use HOME funds for tenant-based rental assistance.

Non-Housing Community Development Needs

Overview

This section identifies the non-housing community development needs of Vermont. These needs have been identified from a variety of sources including regional input forums, surveys and analysis of state data, reports and trends.

Vermont has a number of non-housing community development needs. The needs and extent of appropriate assistance differ from community to community. Vermont is one of the most rural states in the nation and thus has few large population centers. Vermont has been undergoing a transition from a largely agriculturally based economy to a diversified economy for decades. This transition presents challenges and opportunities for the state and its residents. Tourism, education, healthcare, high-tech and green economy jobs seem to be driving the new economic future of Vermont. However, Vermont residents and lawmakers have consistently made commitments to honor the past agricultural traditions of a working landscape and sustainable growth patterns.

CDBG funding has and will continue to support a wide range of community development needs statewide. The recent economic down-turn only strengthens the state commitment to support Economic Development projects statewide. Job creation and retention have been and will continue to be the top priority for non-housing CDBG funding. CDBG funding for other Community Development needs such as public service and public facility projects will also be considered from all eligible communities in the state. The Community Development needs and priorities vary from region to region and from community to community and Vermont residents pride themselves on local effort, ingenuity and creativity in solving local problems. Vermont's CDBG program wants to support and encourage local Community Development initiatives that benefit low and moderate income residents and have lasting results.

Overarching principles for all Vermont CDBG funding include:

- ❖ Coordination with all appropriate state, federal and local agencies to ensure appropriate funding and technical assistance is available for each project and that projects are not redundant or duplicating services.
- ❖ Public investments should be leveraged with other resources and opportunities to recycle or re-use funds should be promoted.
- ❖ Public investments must be equitable and deliver lasting benefits to the community and state.
- ❖ Full and open participation by the public, including populations that are traditionally underrepresented and underserved.
- ❖ Redeveloping existing, historic structures, and underutilized properties first.
- ❖ Support the revitalization of downtowns and villages by encouraging reuse and rehabilitation of existing infrastructure.
- ❖ Support development that is compact, conserves land, water and other natural resources.
- ❖ Support development that is mixed in use, walkable, accessible, connected to; public transportation systems, educational opportunities, cultural and civic activities and recreational outlets.
- ❖ Projects should strive for energy efficiency and utilization of sustainable principles and practices.

- ❖ Development should seek to restore or enhance the state's natural resources and contribute to the Vermont brand and identity.
- ❖ Projects should enhance the economic opportunity of all Vermonters and priority should be given to projects delivering livable wage jobs.
- ❖ Projects must be supported at the local level and be consistent with local and regional planning efforts.
- ❖ Projects that increase job opportunities and/or housing opportunities should be coordinated to maximize existing housing or labor markets.
- ❖ Projects should increase or enhance access to services, public facilities, housing and employment opportunities for low and moderate income residents.

Identified Priorities

Community Development needs vary around the state, but a number of common themes emerged during the regional input sessions conducted prior to the development of this Consolidated Plan. In addition, the on-line survey conducted for the Consolidated Plan confirmed these themes. By in-large the public felt the investment of Community Development funding was most needed to support affordable housing and economic development. The public also supports investment in the infrastructure, public facilities and public services needs clearly identified by communities. The public strongly supports the utilization and re-use of existing infrastructure. They feel investing in communities with the existing capacity to grow is a more cost effective and efficient use of funds.

The state will support the following Non-Housing Community Development Needs:

Economic Development

Job Creation and Retention is the top non-housing community development need identified in Vermont. Expanding economic opportunity and increasing the wages of average Vermonters is critical at this time. The state CDBG program will support job creation and retention projects and encourages communities to present projects for CDBG funding that:

- Support the growth, expansion and sustainability of existing businesses;
- Attract businesses that locate near available affordable housing and transportation options;
- Support new & existing business growth in communities that have adequate and available infrastructure such as water, sewer, transportation and telecom;
- Strengthen sustainable natural resource-based businesses, including agriculture and forestry;
- Support business that contribute to affordable and sustainable energy production;
- Support the expansion of broadband and cell phone coverage;
- Invest in existing infrastructure to support business expansion;
- Support technology and green economy businesses;
- Support small and micro businesses;
- Support the planning needed for smart economic development investments;
- Support gaps in job training needs for a business or industry to grow;
- Support businesses utilizing Brownfields, infill sites, existing and underutilized industrial or commercial facilities;
- Support business expansion in vacant properties and downtowns;
- Support businesses providing good, livable wages.

Public Facilities

Although not the top Community Development need identified, Public Facilities play an important role in communities throughout the state. These are the places our children play and learn, our seniors receive needed services and we attend to our civic affairs. CDBG funding is often needed to assist with important infrastructure investments, planning and to maintain or change the character of our communities. The state CDBG program will support Public Facility projects that address the following community needs:

- Provide Handicapped (ADA) Access to municipal buildings and libraries;
- Provide Handicapped (ADA) Access to public facilities serving low and moderate income residents;
- Support the expansion of telecom infrastructure when it benefits low and moderate income residents ;
- Support the expansion of water and sewer infrastructure when it benefits low and moderate income residents;
- Support downtown revitalization efforts such as (streetscapes and façade improvements) for communities with primarily low and moderate income residents;
- Support the expansion or development of public facilities that serve low and moderate income residents such as (childcare centers, adult day centers, medical/dental clinics, community centers, food shelves/food banks);
- Support planning for the expansion or development public facilities that serve low and moderate income residents;

Public Services

Although not the top Community Development need identified, Public Services and the availability and access to them are important for communities throughout the state. Receiving needed services are often the most direct way CDBG funding benefits low and moderate individuals. Whether it be access to financial literacy classes at an area non-profit or the bittersweet meal provided at an area food shelf; the action is direct and meaningful. The state CDBG program will support Public Service projects that address the following community needs:

- Support job training programs that lead to employment and primarily benefit low and moderate income residents;
- Support programs that provide low and moderate income residents access to medical, health and dental services;
- Support financial literacy counseling and training programs that benefit low and moderate income residents;
- Support childcare and adult-day care programs that primarily serve low and moderate income residents;
- Support programs that increase self-sufficiency and lead families out of poverty;
- Support other programs that are clearly needed in the community or region that primarily serve and benefit low and moderate income residents;
- Support planning for public service activities that will primarily serve low and moderate income individuals;

- ✓ For a Summary of Non-housing Community Development Objectives See: Specific Priorities and Objects on page 38. For Summary of Annual Objectives see Appendix D.

Community Revitalization Strategies and Section 108 Loan Guarantee

HUD regulations authorize the State to allow municipalities to adopt and implement Community Revitalization Strategies (See 24 CFR 91.315(e)(2)). As set forth in CPD-97-1, HUD has stressed the importance of “a coordinated marshalling of resources” to support comprehensive strategies to revitalize communities. To stimulate the marshalling of such resources, HUD offers certain incentives for municipalities that adopt Community Reinvestment Strategies (See 24 CFR 570.482-570.483). The State has long engaged in, and has long supported, the state/local and public/private partnerships required for coordinated marshalling of resources. To further support such efforts, the State wishes to make available to Section 108 Loan Guarantee applicant-communities the HUD incentives that provide greater flexibility in demonstrating that their projects primarily benefit low-and moderate-income persons. The VCDP may consider, in concert with an application under the Sec. 108 Program, a community request for approval of a Community Revitalization Strategy. A community shall make such request by letter. The VCDP shall consider the request of a community whose Sec. 108 Program application has been accepted, and shall approve such request in accordance with the criteria set forth below.

Available resources vary greatly in nature and scope among Vermont’s communities, the VCDP reserves the discretion to consider, on a case by case basis, what will constitute an appropriate Community Revitalization Strategies and the given criteria is demonstrated in a satisfactory manner.

1. **Boundaries.** A rational boundary for the revitalization strategy area is provided, given the particular strategy, and when appropriate, a redevelopment target area is identified.
2. **Demographic Criteria.** The revitalization strategy area meets one of the following criteria:
 - (a) The area is primarily residential in character, and contains at least 70% low- and moderate-income persons. When appropriate, and on a case-by case basis, the VCDP will consider requesting the HUD field office for an exception to the 70% threshold.
 - (b) The area is in a Federally-designated Empowerment Zone or Enterprise Community.
 - (c) All of the census tracts/block numbering areas in the area have at least a 20% poverty rate, and at least 90% of them have at least a 25% poverty rate; and the area is primarily residential. When appropriate, and on a case-by-case basis, the VCDP will consider requesting the HUD field office for an exception to the 25% threshold.
3. **Ongoing Support and Delivery of Resources.** Demonstration satisfactory to the VCDP, through the request together with a Sec. 108 Program application that total financial resources dedicated to the activities proposed under the Sec 108 Program application and long-term local attention will provide ongoing support to the revitalization strategy area.
4. **Integration of other Funding Resources and Initiatives.** Demonstration satisfactory to the VCDP, through the request together with the Sec. 108 Program application, that other funding resource and other initiatives will be integrated to carry out the Revitalization Strategy. Such resources and initiatives may include, among others, the use of legislatively-designated tax increment finance districts, designation under the Vermont Downtown Program, Act 250 compliance, adopted and regionally confirmed municipal plans under Title 24, and use of appropriate state and federal funding programs.

5. Consultation. Demonstration satisfactory to the VCDP, through the request together with the Sec. 108 Program application, that revitalization area stakeholders have been adequately consulted in development of the Community Revitalization Strategy.
6. Assessment. Demonstration satisfactory to the VCDP, through the request together with the Sec. 108 Program application, that economic conditions of the area have been assessed, the opportunities for economic development improvement have been examined, and the problems likely to be encountered have been assessed.
7. Economic Empowerment. Demonstration satisfactory to the VCDP, through the request and the Sec. 108 Program application, Community Revitalization Strategy contains a realistic development strategy and implementation plan to promote economic progress by creating meaningful jobs for the revitalization area's unemployed and low-and moderate-income residents, and by promoting substantial revitalization of the area.
8. Performance Measurements. The community has committed to report measurable accomplishments toward the results that the community proposes to achieve.

The VCDP will approve amendments to a Community Revitalization Strategy upon request of the Community and a determination that the amendment will enhance furtherance of the goals of the Strategy in accordance with the criteria set forth herein.

Vermont will allow use of the Section 108 Loan Guarantee Program without a Community Revitalization Strategy when projects are eligible to meet the benefit requirements of Section 108 independent of a Community Revitalization Strategy.

The Section 108 Program provides for loans to communities and now to the state as authorized under the 2009 Appropriations Act and Section 222, directly from HUD, supported by the pledge of the State's future CDBG allocation. HUD requires a pledge of a portion of the CDBG by the state, as well as other collateral by the community and/or state, in order to secure the loan it makes to a community or other approved entity. Such loans may have terms of no more than 20 years. Federal law governing the program provides that the aggregate principal amount of loans to communities may not exceed five times the amount of the most recent CDBG allocation. The VCD program will limit the State of Vermont's participation to pledges on no more than \$22 million in aggregate principal amount of loans at any time, with annual debt service not to exceed \$2 million at any time. Under the sec 108 Program, a pledge by the State of Vermont of the CDBG in support of a loan to a community from HUD would provide the ability to HUD to draw directly from Vermont's CDBG award during the term of the loan to satisfy any failure by the community to meet a payment obligation to HUD. The VCDP would not be obligated to satisfy any community obligation on an accelerated basis, but only upon the periodic payment terms established between HUD and the community at the outset.

No pledge would be made by the VCDP unless (1) the project met the priorities of the Consolidated Plan in effect at the time of the pledge, (2) the project met all requirements of the Section 108 Program, (3) the project was determined by the VCDP to be feasible and able to produce revenue adequate to meet the community's entire obligation to HUD, and (4) adequate security was provided to compensate for the VCDP pledge if ever called upon by HUD.

The applicant community bore the costs of the VCDP review, including but not limited to the determination of feasibility and adequacy of the security to be provided to the VCDP by the community. The VCDP determined whether to consider qualified applications on a case-by-case basis, after consideration of the VCDP's ability to pledge in accordance the parameters set forth above. Any accepted application was reviewed by the VCDP and appropriately contracted

consultants. The conclusions of the review were submitted to the Vermont Community Development Board at a regular or special meeting for consideration and recommendation to the Secretary of the Agency. The Secretary made the final determination as to the amount and term of any pledge of the CDBG.

2010-2015 Strategies and Actions to Remove or Ameliorate Negative Effects of Policies that Serve as Barriers to Affordable Housing

As shown in the Market Analysis section of the Consolidated Plan, the State identified several policies which impact the cost of housing and the incentives to develop, maintain, or improve affordable housing, which are described in more detail in the Housing Stock Challenges Fact Sheet of the 2010 Vermont Housing Needs Assessment. To the extent that any of those policies have a detrimental effect on the State's ability to achieve its goals and objectives, the State will seek out ways to remove or ameliorate those negative effects including the following:

Limited Public Resources

Strategy: Maximize leveraging, and seek to find ways to reduce per unit costs.

Strategy: Make efficient use of limited resources.

Strategy: Support continuation and expansion of State sponsored affordable housing tax credits.

Actions: VCDP Board, State budget, Housing Council

Commitment to permanent affordability

Strategy: Retain the State's commitment to perpetual affordability.

Act 250 and local land use controls

Strategy: Continue to review state and local permitting for areas to strengthen environmental protection while simplifying permitting.

Land Use Statute Allowing Affordable Housing Statewide

Strategy: Continue to provide technical assistance to communities and property owners that wish to support affordable housing.

Strategy: Provide the brochure "Adding an Apartment to Your House; New Opportunities for Homeowners" to persons seeking to develop or add an accessory dwelling unit, and make referrals to sources of potential funding.

Strategy: Provide technical assistance to municipalities around zoning and land use planning through the Department's Division of Community Development and Planning.

Designated areas for growth

Strategy: Encourage and promote development and growth in Designated Downtowns and Village Centers, Growth Centers, Vermont Neighborhoods and New Town Centers.

Actions: Downtown Board, technical assistance, annual conference

Standards for health and habitability

Strategy: Simplify State housing and habitability rules and provide for cost effective enforcement while limiting the impact on landlords and not adding new responsibilities onto State government agencies.

2011 Actions to Remove Barriers to Affordable Housing

For fiscal year 2011, the Department of Economic, Housing and Community Development (DEHCD) will grant approximately \$400,000 to municipalities to promote community planning, revitalization and development activities that maintain Vermont's land use goal of compact settlements separated by rural lands.

The Department proposed legislation, which was approved by the 2011 Legislature, expanding the Vermont Neighborhoods program to allow landowners to apply for designation for projects located in municipalities that have not adopted the minimum density and/or design standards. The Department will administer the change and educate landowners and developers.

The Department proposed legislation, also enacted in 2011, to preserve an exception to the Uniform Common Interest Ownership Act for certain types of development so that they can more effectively use programs such as the new markets tax credit and the low income housing tax credit to fund affordable housing projects. The Department will support the continuation of this financing mechanism.

A Buildings Code Study Committee will review Vermont's use of two separate codes to regulate construction of public buildings (including rental housing) and report to the General Assembly on how this could be simplified, reducing confusion and eliminating a barrier to development.

The Division for Community Planning and Revitalization will conduct the Annual Vermont Downtown Conference. This annual event provides educational opportunities on historic preservation, downtown revitalization or community development issues.

The State will support continued funding for affordable housing development, services and assistance at the state and federal levels. This will include support for state funding of assistance to the homeless and the Vermont Housing and Conservation Board.

The State will conduct a review of state and local permitting for areas to strengthen environmental protection while simplifying permitting. Focus groups will include affordable housing developers. The State will propose permit reform legislation that addresses identified improvements.

The Department will support fair housing legislation making it illegal to discriminate in land-use decisions or permitting against developments that contain affordable housing for low-income individuals and families.

The Department will continue educating municipal officials on the impacts of exclusionary zoning and the connection between municipal land use decisions and fair housing. It will also encourage the adoption of municipal policies, practices, and procedures based on inclusionary zoning principles.

The State will review excess state-owned property and land for potential affordable housing development.

Following a Governor's Summit on Housing the Homeless, the State will review the recommended action steps for eliminating barriers to housing Vermont's most vulnerable for implementation or proposing legislation.

The Department is overseeing the current update to the State of Vermont's Analysis of Impediments to Fair Housing Choice that has just commenced and will ensure that regulatory and permitting practices are reviewed as part of that process.

2010 – 2015 Lead Based Paint Strategy

Lead-based paint remains a major concern in Vermont due to the State's older housing stock, particularly rental properties that house many of its lower income residents. More than 70% of Vermont's housing was constructed before 1978 when the use of lead paint was banned. Because the State is so reliant upon this older housing stock to meet the needs of low and moderate income people, hazards from deteriorated lead paint and unsafe renovations continue to present considerable challenges.

In 2008 Vermont was one of the first jurisdictions to recognize the dangers of any lead in children's blood and lowered its "level of concern" to 5 micrograms per deciliter of blood, nearing the detectable limits of standard laboratory analysis. Screening of children under six over the last few years has shown at least 1 of every 8 tested to have blood lead levels greater than 5 ug/dl. Many other high-risk children are not being screened, so true prevalence rates are probably even higher. If certain childhood testing goals are not met, Vermont law will require mandatory testing beginning in 2011.

Since 1996 Vermont has had a law (Title 18, Chapter 38) that has reduced the number of Vermont children exposed to lead paint hazards in their homes by requiring rental property owners and child care providers to safely address potential problems in pre-1978 buildings. Rates of blood lead screening continue to improve as the consequences of childhood lead poisoning become better known. Over 16,000 property owners, contractors, painters, maintenance workers and others have been trained in lead safe work practices. Public awareness of the potential dangers of lead paint hazards has improved in the last decade thanks to the efforts of the Vermont Department of Health, the Vermont Housing & Conservation Board's Lead-Based Paint Hazard Reduction Program, and other health and housing groups.

HUD's Lead Safe Housing Regulation (1012/1013) has been fully implemented in Vermont for a decade now. The State is currently evaluating how the new EPA Renovation, Repair and Painting (RRP) rule will intersect with HUD's rule and the State's own, similar regulations. Many affected parties, including contractors, property owners and others are calling for integration of the RRP rule into Vermont's law, but tough economic times and budget deficits make it uncertain at this time if this will be done. Many feel that having two redundant regulations that must be followed independent of each other will hurt the cause of lead poisoning prevention.

Since 1994, VHCB's Lead-Based Paint Hazard Reduction Program has utilized numerous HUD Lead Hazard Control Grants to control lead paint hazards in more than 2000 homes and apartments throughout the State. The Program provides assistance to low-income homeowners, private owners of affordable rentals, and non-profit developers whose apartments remain perpetually-affordable to low-income residents. The Program works closely with all federally funded housing assistance programs to coordinate implementation of the Lead Safe Housing Regulation. The City of Burlington also administers a HUD-funded lead hazard control program in Vermont's largest city.

Vermont has made significant strides in the last decade to address this preventable problem by raising awareness about potential dangers and working to eliminate hazards in our older housing stock. Continued vigilance is required to make sure these old properties are maintained in good condition and do not present future hazards to resident children's health.

2011 Action Plan: Actions to evaluate and reduce lead-based paint hazards

The State of Vermont proposes the following activities to reduce childhood lead poisoning and to integrate lead poisoning prevention efforts into affordable housing programs:

1. Implement the recommendations of the 2006 'Get the Lead Out of Vermont' Task Force.
2. Continue to implement provisions of Act 94 (an Act Relating to Childhood Lead Poisoning Screening and Lead Hazard Abatement), passed by the Vermont General Assembly in 1993.
3. Continue to develop and implement appropriate recommendations of Act 94 and Act 165 (passed 1996), including the development of financial strategies for lead hazard reduction in future years; and pursue further legislative action to reduce lead paint hazards.
4. Continue to implement activities of the State and Community-Based Childhood Lead Poisoning Prevention Program, administered by the Health Protection Division, Vermont Department of Health, through a grant from the U.S. Centers for Disease Control (CDC).
5. Continue to implement activities of the state-wide Lead-Based Paint Hazard Reduction Grant Program (U.S. Department of Housing & Urban Development) in the private housing stock, administered by the Vermont Housing & Conservation Board.
6. Continued activities of the Burlington Lead Program, funded by a HUD Lead Hazard Control Grant.
7. Continue to seek additional HUD funds to address the continued need for lead-based paint hazard reduction in thousands of Vermont housing units.
8. Maintain regular contact with staff at the National Center for Healthy Housing (formerly the National Center for Lead Safe Housing) in Columbia, Maryland.
9. Continue participation on the New England Lead Coordinating Committee, convened by the Tufts University School of Medicine and the University of Connecticut.
10. Evaluate and amend policies on lead-based paint and other toxic and hazardous materials of the Vermont Housing Finance Agency and the Vermont Housing & Conservation Board, as appropriate.
11. Coordinate procedures with the Department of Health, the Vermont State Housing Authority and local Public Housing Authorities regarding childhood poisoning in owned and assisted units, as needed.
12. Continue to build a database in the Department of Health regarding incidence of childhood lead poisoning and presence of lead hazards in housing stock.
13. Coordinate lead hazard reduction efforts with activities of the State Office of Economic Opportunity Weatherization Assistance Program in low-income housing units.
14. Continue public information and education efforts.
15. Continue to develop public and private financial resources for lead-based paint hazard control activities in Vermont's housing stock.
16. Coordinate with the Department of Health and affordable housing funders and developers in implementing the "Healthy Homes" program promoted by HUD.
17. Continue coordination and collaboration among health, housing, and historic preservation agencies and interest groups.

2010-2015 Anti Poverty Strategy

The State's strategy to reduce the number of poverty level families is to (a) meet basic subsistence requirements for those in need, (b) strengthen and preserve families, and (c) support self-empowerment. The policies and programs for achieving a reduction in poverty are coordinated primarily through the Department for Children and Families (DCF) of the Agency of Human Services (AHS). DCF administers anti poverty programs and benefits programs such as, the federal Community Services Block Grant, Emergency Solutions Grant Program, Weatherization Assistance Program, TANF, Food Stamps, Medicaid, General Assistance, AABD, and Fuel Assistance. Economic Services also administers Vermont's Reach-Up Program, which provides education, training, and employment opportunities for welfare recipients working toward self-sufficiency. The Department of Labor administers job training programs for low income youth and adults that are designed to help them gain competitive work skills and find employment.

Through its programs, DCF of AHS seeks to increase the self-sufficiency of Vermonters and strengthen Vermont communities. AHS works in partnership with the private sector, community-based organizations, agencies of government, and other groups to eliminate the causes and symptoms of poverty. In working with these groups, the Department for Children and Families provides program and grants management, resource identification and development, training and technical assistance, and advocacy for community-based organizations in a manner that fosters creativity and innovation. By connecting communities to resources within government and the private sector, DCF works to eliminate poverty.

The Agency of Human Services (AHS) has a long history of coordinating its efforts with the Department of Economic, Housing and Community Development, Vermont State Housing Authority, Vermont Housing and Conservation Board, local Public Housing Authorities, private landlords and other housing organizations to assure that housing services reach Vermont's neediest citizens. As stated above Economic Services administers the Reach Up program which provides employment and job training services to TANF recipients.

Examples of such collaborations include:

- Coordinating the Vermont Interagency Council on Homelessness to create and carry out a ten-year plan to end chronic homelessness in Vermont;
- (Deleted reference to coordinating HMIS steering committee)AHS' active participation on the Vermont Housing Council, which provides a coordinating forum on housing policy and programs;
- AHS' participation on the Vermont Community Development Program's Board;
- continued cooperation with non-profit organizations serving the homeless in Vermont to refine the statewide "Continuum of Care" strategy and plan;
- coordination with other state agencies and non-profit groups of the range of federal McKinney programs, including the Emergency Solutions Grant Program and the Supportive Housing Program; and
- AHS' active participation in the development and review of the state's Consolidated Plan.

2011 Action Plan: Actions to Reduce the Number of Poverty Level Families

In the next year the State's will continue to actively pursue and implement the strategies described above to reduce poverty in Vermont.

2010-2015 Coordination Strategy

In the last few years, affordable housing providers and representatives of health, mental health, environmental, labor, and service agencies have substantially strengthened their networking and coordination activities. The State, through the DEHCD, has actively encouraged and participated in these efforts, and will continue to do so.

2011 Action Plan: Actions to Enhance Coordination

In the next year, the following activities will be undertaken:

- continue coordination efforts with housing providers and funders and human services representatives on a number of initiatives;
- continue participation in the Vermont Interagency Council on Homelessness;
- continue coordination efforts with the agencies of Health, Department of Public Safety Division of Fire Prevention, Natural Resources, Office of Economic Opportunity, and Attorney General to address serious health, safety and environmental issues in mobile home parks;
- continue, through the Department's leadership of the Housing Council, formation of state policy and will assist housing providers, state agencies, such as the Vermont Housing and Conservation Board, (VHCB), Vermont State Housing Authority (VSHA) and others to ensure the availability of safe and affordable housing for all Vermonters; and
- to better implement the 10 year plan to end homelessness, the agreed upon priority need as determined and voted by the regional Continuum of Care will be an important factor considered in awarding Consolidated Plan housing resources that are targeted to people who are homeless or at risk of homelessness.

2010-2015 Low Income Housing Tax Credit Strategy

The State of Vermont makes LIHTC allocations in accordance with an approved Qualified Allocation Plan (QAP). By Executive Order the Vermont Housing Finance Agency (VHFA) is designated the allocating agency for the program, and receives guidance on QAP and allocation policies from the Joint Committee on Tax Credits (JCTC) which includes the Commissioner of the Department of Economic, Housing and Community Development, the Executive Director of the VHFA, the Executive Director of the State Housing Authority, (or their designees), the Executive Director of the Vermont Housing and Conservation Board, and one other member appointed by the Governor's office.

The QAP contains basic requirements, which each project is required to meet. Evaluation criteria are then applied to projects meeting application requirements. Of primary preference are projects that meet Consolidated Plan priorities and serve the lowest income tenants and qualifying tenants for the longest period of time. Other guidelines address selection criteria required by Congress, such as project location.

In order to monitor and ensure compliance with tax credit laws, all LIHTC recipients are required to execute and record a Housing Subsidy Covenant approved by VHFA. Eligible applicants in the LIHTC program include nonprofit and for-profit developers who form partnerships with private investors many of which are banks doing business in Vermont. In many cases, LIHTC projects are also dependent on other federal and State resources which increase the State's ability to ensure affordability to very low and low-income Vermonters beyond the rent and occupancy restrictions imposed by U.S. tax laws that set the parameters of the tax credit program.

Vermont receives just over \$2.4 million a year in allocated tax credits. In January 2004 VHFA went to a rolling allocation process that will allow for some forward commitments of credits. From the 2009 credit ceiling, \$2.7 million was allocated in low income housing tax credits contributing to the production of 164 newly built or rehabilitated units in six communities including Brattleboro, Colchester, St Albans, Swanton, Alburgh, and Bellows Falls. An additional \$465,000 in credits was issued in conjunction with tax-exempt bond financing. These credits supported the construction or rehabilitation of 77 total units in three communities: Bellows Falls, Newport, and Essex.

The State Affordable Housing Tax Credit program launched in 2000 continued to assist in providing supplementary tax credits. In Fiscal Year 2009, \$500,000 of credits was reserved for properties in Essex, Guilford, Brattleboro, Townshend, Warren, Stowe, Montpelier, Shoreham, and Woodstock.

2011 Action Plan: Coordination of LIHTC with Development of Affordable Housing

All LIHTC recipients are required to execute and record a Housing Subsidy Covenant approved by VHFA. Eligible applicants in the LIHTC program include nonprofit and for-profit developers who form partnerships with private investors many of which are banks doing business in Vermont. In many cases, LIHTC projects are also dependent on other federal and state resources which increase the state's ability to ensure affordability to extremely-low and low-income Vermonters beyond the rent and occupancy restrictions imposed by U.S. tax laws that set the parameters of the tax credit program.

A revised QAP approved by the JCTC on February 8, 2011:

- ◆ Requires projects to meet Green Building and Design Standards as a condition of funding where previously developers had only been 'encouraged' to meet these standards. This coordinates with the Strategy "Promote the development of new rental housing designed and built to a level of energy efficiency that meets or exceeds the levels required to qualify for the Energy Star label."
- ◆ Adds two lower tier funding priorities for projects that are: 1) located in dense infill areas; and 2) served by public transportation. This coordinates with the Strategy "Promote projects in Designated Downtowns and Village Centers, Growth Centers, Vermont Neighborhoods and New Town Centers"
- ◆ Adds a 30% basis boost for projects setting aside 10% of all units for households that area homeless or at risk of becoming homeless. This coordinates with the State's Homeless and Special Needs Strategy and Actions.

2011 Action Plan: Other Actions Not Listed Previously

Vermont Housing Council

The Housing Council includes representatives from numerous state and federal agencies and nonprofit and private housing providers. The Housing Council meets bimonthly. Several members have participated actively in the development of the Consolidated Plan. The Council's specific responsibilities for the next year will be to:

- review and update the Housing Council's Executive Order and charge;
- continue the Vermont Housing Awareness Campaign;
- continue the on-going work of the Fair Housing Committee;

Fair Housing

The State of Vermont is committed to eliminating discriminatory housing practices and to affirmatively furthering fair housing (AFFH). This commitment is underscored by the fact that affirmatively furthering fair housing is one of the State's responsibilities as part of its acceptance and management of the CDBG funds from HUD.

As requested in HUD's July 2010 approval of the State's 2010 Five Year Consolidated Plan and One Year Action Plan, the State responded to HUD's FHEO concerns by including in the 2010 CAPER the Affirmatively Furthering Fair Housing section, a discussion of fair housing actions that incorporate the impediments to fair housing identified in the State's 2006 AI and that identify the actions and activities that the State undertook in the prior year, and will undertake in the coming year, to address those impediments. The following summarizes the actions and activities the State plans to continue in the next year:

1. Collaborate with the CVOEO Fair Housing Project and the Vermont Human Rights Commission to provide comprehensive fair housing trainings throughout the state.
2. Provide funding to the CVOEO Fair Housing Project to provide AFFH trainings to municipal officials, and produce and distribute educational materials in five languages for people with limited English proficiency.
3. Require all municipalities receiving CDBG funding to receive fair housing training on federal and State fair housing laws and on ways municipalities can affirmatively further fair housing at the local level.
4. Chair and staff the Fair Housing Committee of the Vermont Housing Council.
5. Educate municipalities on the importance of providing a variety of housing choices to their residents by staffing the Vermont Land Use Education and Training Collaborative and by maintaining, upon request, content on the Vermont Planners Information Center website at VPIC.org.
6. Administer and staff the Vermont Neighborhood Program to provide financial benefits to stimulate the development of new housing, including affordable housing, in targeted areas in and around the designated downtowns, village centers, new town centers, and growth centers.

7. Provide assistance to the general public regarding Fair Housing and Landlord/Tenant Laws and their rights and responsibilities under those laws. The Department also fields inquiries and complaints from the public and makes referrals to the Human Rights Commission if necessary.
8. Designate April as Fair Housing Month in Vermont by Gubernatorial Proclamation.
9. Ensure all CDBG grantees adopt a Fair Housing Policy and submit verification of such policy; and ensure said policy is posted at the municipal offices as well as at any construction site involving a housing project. Field monitoring visits are made by the VCDP staff to verify the visibility of the posted notices that provide individuals information as to the municipal Fair Housing Policy.
10. Contact, as part of VCDP's staff review of CDBG grant applications, the Vermont Human Rights Commission and the Attorney General's Office to determine whether any findings against municipalities have been made. To date, there have been no validated findings made in any of the municipalities that received VCDP funding.
11. Maintain and keep up to date a Fair Housing page on the Department's website to provide public access to Fair Housing information such as the State's Analysis of Impediments, links to Fair Housing resources and advocacy groups, and current and past editions of the "Fair Housing News" which is published by the Vermont Human Rights Commission and the Champlain Valley Office of Economic Opportunity's Fair Housing Project.
12. The State is commencing an update to its Analysis of Impediments to Fair Housing Choice in early May 2011 and will collaborate with the Champlain Valley Office of Economic Opportunity's (CVOEO) Fair Housing Project in this process to conduct Focus Groups throughout the State to ensure the broadest possible outreach efforts are achieved.
13. The State has also begun a new initiative with the CVOEO Fair Housing Project to identify municipalities that not only have adopted land use regulations that support a broad range of housing opportunities, including multi-family housing and group homes, but more importantly that *implement* those regulations in a manner that affirmatively furthers fair housing. Once those municipalities are identified, the implementation of their land use policies and practices will be assessed and developed into models for other municipalities throughout the state to duplicate.
14. Collaborate with CVOEO to publish an "AFFH Guidebook for Municipalities."
15. Collaborate with CVOEO which draft a script by December 2011 for a video helping community officials and planners understand their responsibility to further fair housing. The Department will then contract with CCTV or a similar organization to produce the video during 2012.

6. Table of Federal, Non-federal Public, and Private Resources

Resource type	Source or program	Source or Program Description	Explanation of federal funds leveraging and match requirements, if any
Federal	Community Development Block Grant (CDBG)	Housing, public facilities and services, economic development	10% match requirement for business projects, 25% for planning grants, 25% match for ADA projects, 25% match for slums and blight
Federal	Low Income Home Energy Assistance Program (LIHEAP)	Heating assistance for low income households	
Federal	Emergency Solutions Grant Program (ESGP)	Housing and services for homeless families and/or individuals	1:1 or 100% match requirement
Federal	Federal Workforce Investment Act (WAI)	On the job training program	Up to 50% match requirement for training new employees. Managed by Vermont Department of Labor
Federal	HOME	Affordable housing, Community Housing Development Organization (CHDO) capacity funds	25% match for rehabilitation and new construction
Federal	Housing Opportunities for Persons with Aids (HOPWA)	HIV/AIDS housing and supportive services	Points awarded for leveraging
Federal	Lead-Based Paint Hazard Reduction Program	Lead paint hazard control for low income homeowners and private and nonprofit landlords	10% match required. CDBG funds are the only federal match permitted
Federal	USDA-Rural Development (USA-RD)	Loans and grants to municipalities and nonprofits for water and sewer facilities and public services, business loans	Water and waste disposal-grants up to 75% of project cost, loans up to 100% of local costs; business and Industry-loan guarantees up to 80%, intermediary re-lending program up to 100%; community facilities-no match required
Federal	USDA-RD 515 Rural Rental Housing Programs	Direct mortgage loans to provide affordable rental housing to low and moderate income families, the elderly and disabled	3% equity for private developers; none for nonprofit, leveraging encouraged
Federal	Housing Choice Vouchers (Section 8)	Rental and homeownership subsidy for low income households	
Federal	FHA Section 202 Elderly	Construction, rehab, or acquisition of supportive rental housing for very low income elderly persons	0.5% of the Capital Advance but not more than \$25,000
Federal	FHA Section 811 Handicapped Homeless	To develop supportive rental housing for low income disabled adults	0.5% of the Capital Advance but not more than \$10,000
Federal	Continuum of Care 1. Shelter Plus Care 2. Transitional Housing		Supportive service match equal to the value of the rental assistance provided by HUD

6. Table of Federal, Non-federal Public, and Private Resources

Resource type	Source or program	Source or Program Description	Explanation of federal funds leveraging and match requirements, if any
Private	Federal Housing Credits (formerly Low Income Housing Tax Credit)	Brings equity investments into affordable rental housing development and rehabilitation, administered by VHFA. Supplemented by \$400,000 in State tax credits.	
Private	U.S. Small Business Administration	Various types of loans from participating banks for small businesses	Guarantees available for 50-90% of bank loan. SBA 504 loans cover up to 40% of project costs when a Certified Community Development company (CDC) provides 50% equity with a junior lien.
Private	Federal Home Loan Bank Community Investment and Affordable Housing Programs (FHLB)	Affordable Housing Program offers grants and subsidized advances for affordable housing; Community Development advance is a reduced-rate advance for funding eligible affordable-housing, economic-development, and mixed-use initiatives; New England Fund provides advances to support housing and community-development initiatives that serve moderate-income households and neighborhoods; Equity Builder Program offers members grants to provide income-eligible buyers with down-payment, closing-cost, and rehabilitation assistance, as well as matched-savings programs.	20% equity for Loan Program. Leverage encouraged for subsidized advance
Private	Vermont Community Loan Fund (Including state Charitable Investments in Housing credit)	Loans for small businesses, affordable housing, community facilities, and child care facilities.	Maximum loan-to-value- ratios vary
Non-federal public	Vermont Department of Environmental Conservation, State Drinking Water RLF	Loans for public community water supplies, also have a wastewater fund	Variable matching and requirements depending on purpose.
Non-federal public	Local and Regional Revolving Loan Funds	Network of RLF's providing rental rehab and home improvement loans	Matching requirements vary
Non-federal public	Vermont Economic Development Authority	Provides loans and other financial support to eligible and qualified Vermont businesses; manages a wide range of low-cost lending programs for small- and medium-sized businesses.	40%-70% match required, depending on program

6. Table of Federal, Non-federal Public, and Private Resources

Resource type	Source or program	Source or Program Description	Explanation of federal funds leveraging and match requirements, if any
Non-federal public	Vermont Housing Conservation Board	Independent, state-supported funding agency providing grants, loans and technical assistance to nonprofit organizations, municipalities and state agencies for the development of perpetually affordable housing and for the conservation of important agricultural land, recreational land, natural areas and historic properties in Vermont.	Leveraging encouraged. No match required
Non-federal public	Vermont Housing Finance Agency <ol style="list-style-type: none"> 1. Multi-Family Bonding 2. Mortgage Revenue Bonding 3. Predevelopment Programs (single and multi-family) 	Provides a variety of loan products for developers of multi- and single-family properties and mortgage programs for home buyers	<ol style="list-style-type: none"> 1. Equity contribution required 2. 5% equity contribution required 3. 0-5% of eligible development costs required as match
Non-federal public	Vermont Department of Economic Development	Available for new and existing manufacturing jobs, to train for new technologies and for cross-training	Job training grants: 50% match required.
Non-federal public	Vermont Division for Historic Preservation	Grants to assist private property owners, municipalities and non-profits in restoring important historic buildings across the state. Administers federal and state tax credits designed to encourage the restoration/rehabilitation of historic buildings.	Historic Preservation Grant Program: 50% match required
Non-federal public	Vermont Department of Labor <ol style="list-style-type: none"> 1. Business/Education partnership grant 2. Registered Apprenticeship 	Employer-sponsored training program that includes both supervised work experience and related instruction in over 30 different occupations.	<ol style="list-style-type: none"> 1. Required match equal to amount of grant 2. Leveraged funds from employers include tuition costs for required related instruction, and on-the-job training costs for each apprentice.

7. 2011 Action Plan: Program Specific Requirements

Community Development Block Grant (CDBG)

Method of Distribution

Introduction

The Vermont Community Development Program (VCDP) is funded with Community Development Block Grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, as amended, 42 U.S.C. Section 5301 et seq., herein referred to as the "FEDERAL ACT." All municipalities in Vermont, except Burlington (which receives funds directly from HUD), are eligible to apply for VCDP funds.

The VCDP is authorized under the Vermont Community Development Act, Title 10 V.S.A. Chapter 29, referred to in this Consolidated Plan as the "STATE ACT." The lead agency, ACCD, administers the VCDP through the Department of Economic, Housing and Community Development (DEHCD). All municipalities, unless currently sanctioned, are eligible to apply for VCDP funding through a competitive, needs based application process. Funding levels, maximum and minimum grant requests, selection criteria, State priorities, and application assistance can be found on the next pages and in more detail at the VCDP Website below.

The VCDP provides eligibility criteria, application workshops, notices of funding availability, a Program Guide and Application Instructions at its Website:

<http://www.dhca.state.vt.us/VCDP/index.htm>

The Website is used to provide potential applicants and existing grantees with all the resources needed to apply for funding, receive technical assistance and successfully manage their projects. VCDP Staff are readily available to assist potential applicants, current applicants and existing grantees.

Each year, VCDP notifies (Via Email) every eligible municipality in the state of the availability of CDBG funding and up-coming application workshops. This outreach and communication is critical for VCDP since funding is not directly allocated or targeted to particular communities or regions within the state. VCDP provides an open application process with applications accepted throughout the year and funding availability guaranteed throughout the year. Five VCDP Board meetings to make funding recommendations have been established for the FFY 2011 Allocation. Municipalities are encouraged to apply for funding throughout the year. More information on VCDP Board Meeting dates, application instructions and assistance accessing the program can be found at <http://www.dhca.state.vt.us/VCDP/index.htm>

Selection Criteria

The State Act stipulates that the allocation of VCDP funds shall be competitive, insure that a wide range of community development activities be eligible, and be based on a system that measures the need and impact of the proposed projects (10 VSA Sec.687). The VCDP has established an application process and selection criteria to meet the intent of the State Act. The VCDP uses a Web-based Application System. Applications are completed online and are submitted by municipalities. VCDP staff then review each application for eligibility and

completeness, before conducting a thorough analysis of each eligible application. The VCDP Board then reviews each application, interviews & questions the applicants using the below criteria and makes funding recommendations to the ACCD Secretary on behalf of the Governor. Each of the three criteria has equal weight and staff analyses of the applications are written based on these criteria. The selection criterion is as follows:

1. **Project Need:** The project must meet a documented community or regional need. Determinations will be based on evaluation of such factors as:
 - Need documentation
 - Appropriate solution
 - Appropriate funding
 - Meeting Consolidated Plan priorities
 - Meeting local and regional plan priorities
 - Health/safety risks to beneficiaries
 - Impact if project not funded

2. **Project Impact:** The project must show how well it meets a national objective and how well it impacts the community. Determinations will be based on evaluation of such factors as:
 - Ability to meet the need
 - Number/percentage of very low, low and moderate income persons directly benefiting
 - Longevity of the benefit
 - Beneficiary involvement in developing the project
 - Indirect benefit to LMI persons and the community

3. **Project Feasibility:** The project must be attainable and the representations and commitments within the application must be believable. This will include such factors as:
 - Readiness to start
 - Proposed time frame is realistic
 - Proposed benefit is realistic
 - Costs are appropriate and justified
 - Prior VCDP performance record

Please see the VCDP Program Guide at:

<http://www.dhca.state.vt.us/VCDP/Application/Program%20Guide.htm> for a detailed description of the program including; selection criteria, funding levels and application instructions.

Funds Distribution

The Agency estimates that it will receive \$6,743,207 as the Annual CDBG Award from HUD for the 2011 federal fiscal year. See Chart 1, FFY 2011 Distribution Plan, for breakdown of distribution among funding categories. These funds will be administered in conformance with the Consolidated Plan in effect at the time of grant award to the municipality. As stated throughout this 5 Year Consolidated Plan and 2011 Action Plan, projects that support affordable housing, employment opportunities, public facilities and public services are eligible and encouraged to apply for CDBG funding. The highest priorities continue to be to create affordable housing and employment opportunities for low and moderate income individuals, with

preference for facilitating development and growth in Designated Downtowns and Village Centers.

In the interest of meeting timely distribution requirements of HUD, the Agency reserves the right to award FFY2012 funds under the 2011 Consolidated Plan. Any funds from previous years - those being funds not yet awarded, funds that have been recaptured from previous awards, or program income - will be awarded under the provisions of the Consolidated Plan in effect at the time of award.

Funds Distribution Limitations

The VCDP must expend at least 70% of the HUD Award over a period of three program years to fund activities that principally benefit persons of low and moderate income. Grants for Activities which aid in the prevention or elimination of slums and blight (Slums and Blight) or that are designed to meet community development needs having a particular urgency (Urgent Need) do not necessarily provide a direct benefit to persons with low and moderate incomes. Such awards, therefore, must be drawn from the remaining 30% of the CDBG award over a period of three program years. Grants for these activities combined will be limited to 13% of the total HUD Award over a period of three program years.

Costs for grant activities known as General Administration may not exceed 12% of a VCDP grant award. This limitation assures compliance with the federally imposed cap of 20% of the total Annual HUD Award and program income that may be used for all VCDP planning and general administrative purposes, including both state and local costs.

The Federal Act restricts the total funds that may be used to fund activities known as Public Service to 15% of the Annual HUD Award that is allocated for assistance to municipalities. The maximum allowable for public service activities is shown by Chart I.

The state may use up to one percent of the Annual HUD Awards for FFY88 through FFY2011 -- to the extent funds remain undistributed for these program years -- to provide technical assistance to local governments and nonprofit recipients. The amount established for this VCDP Consolidated Plan is shown in Chart I.

Chart I
FFY2011 DISTRIBUTION PLAN

	FFY2011 Allocation
<u>Available Funds</u>	
Anticipated FFY 2011 Annual HUD Award	\$6,743,207
Anticipated FFY 2011 Program Income*	<u>\$125,000*</u>
 Total Available	 \$6,868,207
<u>Allocations Based on Anticipated FFY 2011 Annual HUD Award and Anticipated Program Income</u>	
Implementation Grants (IG) (Includes Planning Grant Target of 3%)	\$6,198,479*
 Accessibility Modifications Grants (AM) set-aside (1)	 \$200,000
Home Access Grants (HA) set-aside (1)	\$100,000
Microenterprise Development (MD) 1% set-aside (1)	\$67,432
 State Administration	 \$302,296
• (2% \$134,864	
• \$100,000	
• + 1%TA \$67,432	
Total	<u><u>\$6,868,207</u></u>

() (1) FFY2011 AM & HA & MD, any remaining funds available at the time of the last funding round during the period of July 1, 2011 through June 1, 2012 may be awarded to Implementation and Planning Grants.

NOTE: The figures in Chart I are based on the Agency's estimate of the FFY 2011 Award, as suggested by HUD. However, if the allocation is changed, all of the amounts for allocation will also be revised accordingly.

*Program Income (PI) estimate based on amounts expected.

- Funds will be allocated so that each funding cycle will have funds to award.
- The Agency reserves the right to adjust fund categories by up to \$100,000.
- Recaptured funds will be reallocated as soon as feasible.

Program Limitations

Public Service Limitation (15% of allocation for IG's, AM's, HA's & PG's)	\$974,772
Federal 20% Cap for general administration and planning	\$1,348,641
 Limit on Slums & Blight and Urgent Need (13% of Total)	 \$876,617

Chart II							
Synopsis of Grant Types							
	Implementation	Planning	AM	HA	Multi-year Funding Implementation	Interim Financing	Disaster Assistance
Annual Allocation							
	\$6,743,207	Target amount 3% of funding allocation	Minimum \$ 200,000 ¹	Minimum \$ 100,000 ^{1,6}	No amount reserved	\$1,500,000 (Cum. Cap)	Disaster Specific
Funding Limits							
Maximum	\$1,000,000 ²	\$ 30,000 ³	\$ 75,000	\$ 100,000	\$ 1,250,000 ⁴	\$1,000,000	Disaster Specific
Minimum	\$50,000	\$ 3,000	\$ 5,000	\$ 5,000	\$ 250,000		
Grant Duration							
	24 months	18 to 24 months	18 to 24 months	24 months	48 months	12 months	24 months
Application Process							
Early notification	Request	Requested	Requested	Requested	Requested	Requested	Requested if possible
Submission dates	Application deadlines	Application deadlines	Application deadlines	Application deadlines	Application deadlines	Open submission	Open submission
Recommendations by:	Board recommends to Agency Secretary	Staff recommends to the CD Board -Board recommends to Agency Secretary	-Staff recommends to Agency Secretary	Board recommends to Agency Secretary	-Board recommends to Agency Secretary	Selection committee recommends to Agency Secretary ⁵	Selection committee recommends to Agency Secretary ⁶
Awards by:	Agency Secretary	Agency Secretary	Agency Secretary	Agency Secretary	Agency Secretary	Agency Secretary	Agency Secretary
Selection Criteria							
	Need	Need	Need	Need	Need	Need	Need
	Impact	Impact	Impact	Impact	Impact	Impact	Impact
	Feasibility	Feasibility	Feasibility	Feasibility	Feasibility	Feasibility	Feasibility
Special Requirements							
Thresholds	Consolidated Plan & Application	Consolidated Plan & Application	Consolidated Plan & Application	Consolidated Plan & Application	Consolidated Plan & Application	Consolidated Plan & Application	Consolidated Plan & Application

Match requirements	-25% of VCDP Funds in cash or cash-in-kind for ADA and Slums & Blight; which must be applied to remediating the S&B condition.	-25% of VCDP Funds in cash or cash-in-kind.	-25% cash or cash-in-kind match.	-25% of VCDP Funds in cash or cash-in-kind.	-25% of VCDP Funds in cash or cash-in-kind for ADA and Slums & Blight; which must be applied to remediating the S&B condition.	Negotiable, but expectation is to meet IG match requirements	
Other	Credit Analysis (fee associated) may be required for some ED Projects and some Housing Projects.				Credit Analysis (fee associated) may be required for some ED Projects and some Housing Projects.	Irrevocable Letter-of-Credit by municipality	Apply within 4 months of disaster declaration

¹ AM & HA & MD funds not awarded by June 1 may be awarded to Implementation and Planning Grants.

² Maximum funding limit for community public facility and public service projects is \$300,000.

³ Maximum funding limit for a consortium PG application is \$40,000.

⁴ No more than \$500,000 can be forward committed.

⁵ The Agency reserves the right to have IFP & DAP applications go through the full CD Board process if there is no compelling reason to activate the Selection Committee.

⁶ HA funds may be distributed through the scattered site housing RLF's in partnership with VCIL if requested.

Please see the VCDP Program Guide at: <http://www.dhca.state.vt.us/VCDP/Application/Program%20Guide.htm> for a detailed description of the program including; grant types, selection criteria, match requirements, funding levels and application instructions.

Eligibility Thresholds

All applications for VCDP funds must meet the following eligibility thresholds in order to be considered for review. These eligibility thresholds are statutory and cannot be waived by the Agency. Failure to meet all eligibility thresholds will result in rejection of the Application.

- **Eligible Applicant:** The only eligible applicants are Vermont towns and cities and incorporated villages chartered to function as general purpose units of local government. A municipality may apply: as a single applicant, as the lead applicant of a consortium, as a member of a consortium, but not as a single applicant and as lead applicant of a consortium.
- **Eligible Activity:** Only those activities eligible under the Federal Act may be funded under this program.
- **Federal Objective:** Each proposed VCDP activity must meet at least one national objective. The national objective claim must be fully supported, and in some cases, the AGENCY should pre approve your approach for meeting the national objective.
- **State Objective:** Each proposed VCDP activity must meet at least one state objective.
- **Public Hearing:** Each VCDP applicant must conduct at least one (1) public hearing with notice as required by the STATE ACT, prior to application submission. HUD regulations require a minimum of two (2) public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views and responding to proposals and questions. The VCDP complies with this regulation by requiring the first public hearing during the application stage and the second public hearing prior to the completion date of the funded grant program.
- **Municipal Plan:** Community Development Plan/Municipal Plan - Each VCDP applicant, including consortium members, must have an adopted community development plan or a municipal plan adopted in accordance with 24 VSA Ch. 117. The plan must identify the municipality's community development needs including housing and economic development as well as the needs of low and moderate-income persons and the activities to be undertaken to meet such needs. The adoption of a municipal plan in accordance with 24 VSA Ch. 117 to meet the threshold requirement is strongly encouraged and will strengthen the competitiveness of a municipality's application to the VCDP. The adoption of a community development plan to meet the threshold requirement will require the municipality's legislative body to hold at least one public hearing with a 15-day public notice period, including notice to the municipality's planning commission, if applicable, prior to application submission.
- **Anti-Displacement Plan:** Under the provisions of the Uniform Act, 42 USC §4601 et seq., each successful applicant, including all municipalities in joint applications, but excluding Planning Grant applicants, must submit a Residential Anti-Displacement and Relocation Assistance Plan (ADP) and state whether or not the proposed activity will result in displacement, relocation, property demolition, or property change of use.
- Please see the VCDP Program Guide at: <http://www.dhca.state.vt.us/VCDP/Application/Program%20Guide.htm> for a detailed description of eligibility criteria and program thresholds.

VCDP 2011 Program Policy Updates

Unless specifically listed or changed in this section, all VCDP Program Policies identified in previous Consolidated Plans remain in effect.

The following are new VCDP programmatic changes or changes from last year, as further amended:

- For Access Modification Grants, the VCDP program will increase the maximum grant amount from \$50,000 to \$75,000, and reduce the required match from 50% (1:1) to 25%.
- In an effort to maximize efficiency and use of limited funding, VCDP will continue to work toward the goal of simplifying and streamlining the application process and grant administration requirements of the Statewide- Scattered-Site Housing Revolving Loan Funds (Housing RLF's). VCDP will expand the requirement that communities with inactive (as defined by Agency Procedures) VCDP/HUD funded RLF's, commit at least 20% of the RLF balance on hand when applying for VCDP Implementation Grants to include all grant types. Committed funds may be in the form of a loan or grant to the project. For Planning Grants only this requirement will be the lesser of 20% of the RLF balance or the 25% match required whichever is less, up to \$7,500.

Vermont HOME Program Specific Requirements

Method of Distribution

The FFY 2011, Home Investment Partnerships Program (HOME) allocated funds are \$3,356,393. The Department was designated the agency responsible for developing the Consolidated Plan and by statute the Vermont Housing and Conservation Board (VHCB) has been designated as the agency responsible for administering HOME funds.

In FFY 2011, HOME funds will be utilized for the following programs as an investment in the form of grants or long-term deferred loans:

1. **Acquisition and Rehabilitation Program**, to be used for acquisition and rehabilitation of conventional rental properties to make them affordable to low income households, convert them to cooperative properties, or for the acquisition and improvement of mobile home parks;

When HOME funds are used for a rehabilitation project, the work must be performed according to the Participating Jurisdiction's (PJ) written rehabilitation standards, which describe the methods and materials to be used, and the entire unit must be brought up to property standards (applicable state or local codes or one of the model codes described in 24 CFR 92.251(a)(1)).

2. **New Construction Program**, to be used for the production of conventional rental properties that serve an area or market where existing housing stock is limited, housing for households/individuals with documented special needs, the construction of new mobile home parks, or cooperative properties. Units created under this program must be affordable to low income households; and

3. **Refinancing existing debt**, multi-family projects developed by locally based housing organizations that receive HOME funds for rehabilitation may utilize HOME funds to refinance existing debt if there is significant rehabilitation of the property proposed in addition to the refinancing.

Community Housing Development Organizations (CHDOs)

Fifteen percent (15%) or \$503,459 of the FFY 2011 HOME allocation will be reserved for Community Housing Development Organizations (CHDOs) as defined in 24 CFR 92.2.

Up to five percent (5%) or \$167,820 of the State's total HOME allocation will be reserved for organizational capacity funding for CHDOs to implement HOME-funded projects.

Statewide Allocation

The State's allocation (including 15% reserved for CHDOs) of \$3,020,754 in funds will be distributed to projects on a competitive basis throughout the state, excluding the City of Burlington which has its own allocation.

Program Administration

The State's program will be administered by the Vermont Housing and Conservation Board (VHCB) pursuant to a contract with the Department.

The State recognizes that its Consolidated Plan cycle is not consistent with the ability of its agent, VHCB, to commit HOME funds. Considering the fact that Vermont's HOME Program is recognized by HUD as a national leader in achieving the goals of the HOME Program, we find this inconsistency to not be a significant issue in program delivery. However, we will work with VHCB and HUD to determine whether HOME funds can be made available at a time closer to the commencement of the federal fiscal year.

Administrative Costs

The State intends to use up to 10% of the HOME allocation for administrative and planning costs, distributing funds among the two entities involved with administering Vermont's HOME Program: The Department of Economic, Housing and Community Development and Vermont Housing and Conservation Board. The State may use up to \$335,639 in FFY 2011 funds for eligible administrative costs.

Statewide Program Guidelines

Eligible Applicants

Eligibility to apply for HOME funds will be no more restrictive than that required by HUD regulations. Consistent with the HUD regulations, at least 15% will be distributed to Community Housing Development Organizations, as defined by HUD. Applications will be accepted on a rolling basis and acted upon at regularly scheduled Board meetings based on project readiness.

Threshold Criteria for Eligible Applicants

The following criteria must exist in any application to be considered for a commitment of HOME funds:

1. Perpetual affordability secured by a housing subsidy covenant, ground lease with appreciation restrictions, or other mechanism, including the designated enforcing entities, acceptable to at least one of the designated enforcing entities: Vermont Housing and Conservation Board, or the Department of Economic, Housing and Community Development;
2. Project must include at least one of the Consolidated Plan priorities for affordable housing; and
3. Priority is given to Projects with other non-federal funding sources for leveraging the HOME Funds to ensure the overall HOME Program meets the 25% Match Requirement. Projects must demonstrate leverage of resources and cost-effectiveness, including density bonuses, building weatherization, energy efficiency, and fuel switching available from private and public programs, and lead paint hazard abatement. Historically, a majority of the Vermont Housing Conservation Board (VHCB) State appropriation for housing is matched to the HOME Program funds.

Additional Analysis

Justification should be provided by the applicant or analysis will be done by VHCB on the following:

1. **Need for project**, including projected or existing residents and local market need and demand;
2. **Affordability**
 - At a minimum, is the project "affordable" as defined in the HUD regulations?
 - Breakdown of "target" populations by the four income groups: lowest, very low, low and moderate with percentage of annual income to be paid toward housing cost by occupant - are cash flow projections reasonable and do they maintain affordability?
 - If mixed income, is distribution among populations reasonable according to local need and market?
 - Is the proposed perpetual affordability mechanism reasonable based on VHCB experience?
3. **Project Costs and Design**
 - Are projected costs reasonable based on VHCB experience? Soft costs will be evaluated based on needs of particular projects in relation to other projects similar in size and population served.
 - Can projects be completed within 24 months of commitment of HOME funds?
 - Has there been coordination with the Residential Energy Efficiency Program (REEP) regarding incentive contribution for increased energy efficiency measures and is the contribution, if any, reasonable?

Efficient Use of Federal Resources

Consistent with 24 CFR Section 92.250(b), projects using other federal assistance in addition to HOME funds will require an analysis of whether the amount of HOME funds invested is reasonable to achieve affordable housing. This analysis will confirm that the project can be sustained from rent levels affordable to the targeted population while maintaining adequate levels of maintenance or repair and fully funding reserves required by lenders or grantors. This analysis will be done by VHCB for each application.

Commitments of HOME Funds

The distribution of HOME units must, at a minimum, achieve the allocations by income group required by HUD for rental projects (all funds to <80% of median; at least 90% of funds to <60% of median; for projects with five (5) or more HOME units at least 20% of units to <50% of median).

Commitments of HOME funds will not exceed any per unit cap set by VHCB. Based on the Program Guidelines, HOME funds may be committed to a project as a whole provided that per unit allocations meet HUD requirements. Terms will be determined consistent with HUD requirements and will reflect the ability of the project to maintain affordability and to serve the lowest income population based on market demand. Grants may be appropriate.

CHDO Plan

The State of Vermont has an extensive track record in working with Community Housing Development Organizations (CHDOs) and other nonprofit organizations, through the support of the Vermont Housing and Conservation Board and the Vermont Housing Finance Agency.

A minimum of fifteen percent (15%) of the statewide HOME allocation or \$503,459 will be reserved for CHDO projects as defined in 24 CFR 92.2. Vermont may use a portion of this reservation for eligible predevelopment costs.

In addition, the State will reserve up to five percent (5%) of its total HOME allocation, or \$167,820 for operating costs for CHDOs that implement HOME-funded projects. Vermont's housing entities will continue to provide technical assistance and training aimed at strengthening CHDOs and other nonprofit housing developers.

Refinancing Guidelines for HOME Projects

Multi-family projects developed by locally based housing organizations that receive HOME funds for rehabilitation may utilize HOME funds to refinance existing debt consistent with 24 CFR 92.206(b)(2), if they meet the following guidelines:

1. Refinancing is necessary to permit or to continue affordability under section 92.252;
2. Rehabilitation is the primary eligible activity. A minimum of \$7,500 of rehabilitation per unit is required;
3. The grantee must demonstrate management capacity and practices that ensure that the long term needs of the project can be met and the targeted population can be served over an extended affordability period;
4. The grantee must demonstrate that the new investment is being made to maintain current affordable units, to create greater affordability in current affordable units; or to create additional affordable units;
5. Refinancing will be limited to projects that have previously received an investment of public funds;
6. The minimum HOME affordability period shall be 15 years and all HOME assisted projects are required to be perpetually affordable;
7. HOME funds may be used for refinancing anywhere in the state of Vermont with the exception of the City of Burlington;
8. HOME funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG.

Emergency Solutions Grants Program Specific Requirements

Process of Awarding Grants

The Emergency Solutions Grants program (ESG) is administered by the state Office of Economic Opportunity (OEO) to help municipalities and nonprofit organizations, including community and faith-based organizations, provide emergency shelter, drop-in centers, homelessness prevention activities and support services for homeless families and individuals.

Prior to the reauthorization of HUD McKinney-Vento programs (HEARTH Act) this program was known as the Emergency Shelter Grants program. While Department of HUD has not yet promulgated all HEARTH Act regulations at the time of this writing, language in the reauthorization statute emphasizes homelessness prevention and encourages grantees to dedicate at least 40% of ESG funds to that activity. The State OEO is working with partners in the Vermont Agency of Human Services (AHS), the Balance of State Continuum of Care, and external stakeholders to ensure that ESG's enhanced homelessness prevention and re-housing role is part of an integrated, statewide strategy to ending homelessness and improving outcomes for families and individuals. The OEO communicates with representatives from both of Vermont's Continua of Care to foster coordination between COC and ESG projects and activities as encouraged by the HEARTH Act.

One or more grants will be awarded by the OEO to Vermont municipalities or, with municipal approval, nonprofits whose purpose is to assist the homeless. Grants must be matched by the grantee with cash and/or in-kind contributions. Funding for ESG will be done in two phases per HUD determination as of May 31, 2011. The first phase will fund the ESG at \$365,227. The second phase funding will be allocated once an "Emergency Solutions Grant rule is published for effect." "Grantees will be required to complete a substantial amendment of the Consolidated Plan/Action Plan, as necessary, at that time."

Selection Process

Applications for ESG funding will be evaluated by the Office of Economic Opportunity. Part of the selection process may involve a site visit of the finalists at which time documentation listed in the application will be reviewed.

Eligible applicants are municipalities and approved nonprofits including community and faith-based organizations that;

1. Certify that the assisted property will be maintained as an Emergency Shelter for at least:
 - 10 years if grant is used for major renovation or conversion of building;
 - 3 years if grant is used for rehab other than major renovation or conversion;
 - the period of funded assistance provided that the assistance is not rehabilitation or renovation, and
2. Provide evidence of a one-to-one match or request relief for the match requirement in the application. (Historically, the State of Vermont has appropriated state general funds for homeless shelters and services which fulfill this match requirement.)

Selection of applicants for funding will be made based on the following:

- Meeting of criteria as outlined in this document and detailed in the Request for Proposal (RFP).

- The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating grant-funded programs.
- The applicant's effective coordination with organizations in the local "continuum of care," to address identified gaps in services for the homeless and improve outcomes for participants.
 - If the applicant is requesting ESG Operations funding: Assurance that funds will preserve or support existing shelter bed capacity.
 - If applicant is requesting ESG Social Services or Prevention funding: The applicant's ability to transition homeless participants or shelter residents to permanent or transitional housing, and/or prevent homelessness for families and individuals who are at risk.
- New applicants, and applicants who have recently relocated their operations to another municipality, must submit a completed Certification of Local Government Approval with their application.

Grant funds may not be used for the following:

- Acquisition/Mortgage costs;
 - Rehabilitation services such as preparation of work specifications, loan processing or inspections.
 - Renovation, rehabilitation or conversion of buildings owned by primarily religious organizations or entities unless the structure being renovated has been leased to a wholly secular organization.
- Additional guidance on eligible and ineligible uses of ESG funds are contained in the Department of Housing and Urban Development's ESG program guidelines, and in grant agreements between the state of Vermont and its sub-recipients.

Housing Opportunities for Persons with AIDS (HOPWA) Program Specific Requirements

Vermont is ineligible to receive Formula HOPWA funding. Since 1995 however, the Vermont Housing and Conservation Board has responded to the housing needs of Vermonters living with HIV/AIDS through its application for and continued receipt of HOPWA Competitive funding. VHCB has operated a highly successful statewide HIV/AIDS housing and supportive services program, designed to assist HOPWA eligible households in Vermont maintain housing stability, improve access to care, and reduce the risk of homelessness. VHCB was again successful in 2008 in receiving its fifth three-year award which provided \$1,430,000 (an increase of 16.5%) from March 1, 2009 to February 29, 2012 for the three activities detailed below:

Rental Assistance: This component, administered by the Vermont State Housing Authority guarantees that a household pays no more than 30% of its income toward rent and utilities. HOPWA rental assistance fills an important niche, providing households living with HIV/AIDS with rental assistance until they are issued Section 8. The program is currently fully subscribed and serving 41 households annually - an increase of more than 45% from previous years - however, unfortunately, there is a growing waiting list.

Emergency Assistance: Provides small grants to mitigate the impact of financial crises related to housing and utility costs which could jeopardize a household's ability to maintain permanent housing. In the first year of the grant, this program provided emergency assistance to 108 eligible households.

Supportive Services: Provides funds to AIDS Service Organizations (ASOs) to assist people living with HIV/AIDS with the daily obstacles which could hinder their ability to maintain permanent housing. Three ASOs, which together provide statewide coverage, receive this funding on an annual basis. Together, the AIDS Service organizations will provide services to more than 250 individuals over the three-year grant period. Historically, 95% of the households have been able to maintain permanent housing due to these services. Permanent Housing Placement, a new category of assistance as of March 1, 2009, will also be available to 15 households annually, helping those affected by HIV/AIDS to cover the initial costs, such as security deposits and first month's rent, necessary to secure stable housing.

In March of 2011, VHCB will submit an application to HUD to continue the activities of the current HOPWA grant for another three years. If successful, the period of the new grant (HOPWA VI) will be March 1, 2012 to February 28, 2015.

8. Outcome Performance Measures

The State's Consolidated Plan for FFY 2010-2015 outlines specific priorities with respect to the use of federal dollars provided to the state from the formula funding program covered by this Plan (CDBG, HOME, ESG, HOPWA). These priorities were derived from the extensive public input process utilized to develop the 5-year Consolidated Plan as well as an in-depth housing needs assessment completed in 2009. The State recognizes not only the importance of setting priorities for the use of these funds but the importance of establishing a system to measure our ability to achieve these priorities.

The fundamentals of the system include three objectives, three outcome measures and a number of outcome indicators that can be used to report results for all four formula grant programs. The priorities established in the Consolidated Plan will fall within one or more of these prescribed objectives and outcomes. The three objectives are the following: 1.) creating suitable living environments; 2.) providing decent affordable housing; 3.) creating economic opportunities. The three outcomes categories are the following: 1.) accessibility/availability; 2.) affordability and; 3.) sustainability.

The State's strategy is to identify common outcome indicators applicable to more than one type of activity and activity specific indicators (included under each priority statement) for each identified priority in the Consolidated Plan. The outcome indicators will have to be tracked and reported by our grantees.

Common Indicators

- * Amount of other resources leveraged per activity
- * Number of persons, households, units, or beds assisted, as appropriate.
- * Income levels of persons or households by: 30 percent, 50 percent, 60 percent, or 80 percent of area median income.
- * Dollars expended per activity
- * Race, ethnicity, and disability (for activities in programs that currently report these data elements)

A pairing of the State's identified Consolidated Plan priorities and required specific outcome indicators is listed below. For the 2010 – 2015 Consolidated Plan, Economic Development and Housing are the highest priorities with Public Facility and Public Service considered secondary priorities and crucial to meeting overall goals:

Priority: Economic Development

Goal: Create and/or Retain Jobs

Support use of VCDP assistance for community development activities focused on creating and retaining jobs and striving for the best quality jobs attainable for low and moderate income workers

Outcome Indicators:

- Number of jobs created and retained
- Jobs with employer sponsored health care

- Types of jobs created (use existing Economic Development Administration classification)
- Employment status before taking job created
 - Number of unemployed
- DUNS number(s) of business assisted (HUD will use the DUNS numbers to track number of new businesses that remain operational for 3 years after assistance).
- Total businesses assisted
 - Number of new businesses assisted
 - Number of existing businesses assisted, of those, number of expansions and number of relocations.
 - Number located in a downtown

Priority: Affordable Housing

Goal: Increase the supply of affordable housing, including units that serve people with disabilities and seniors

To meet the demand for new housing units in the next five years, production of rental and homeownership housing would have to double.

Rental and/or Homeownership Units Constructed:

Outcome Indicators:

- Number of total units affordable
- Number of total units Section 504 accessible
- Number of total units created through conversion of nonresidential buildings to residential buildings.
- Number qualified as Energy Star.
- Number of units with appropriate wiring for broadband access
- Number of new construction projects located in a downtown

Of affordable units,

- Number occupied by elderly
- Number subsidized with project-based rental assistance (federal, state, or local program)
- Number of years of affordability
- Number of housing units designated for persons with HIV/AIDS, including those units receiving assistance for operations
- Number of units for the chronically homeless, of those, the number made Section 504 accessible
- Number of units of permanent housing designated for homeless persons and families including those units receiving assistance for operations

Of homeowner units,

- Number occupied by first-time homebuyers

Goal: Preserve and Rehabilitate the Existing Housing Stock

The housing stock is old and in many cases in need of significant investment. The existing housing stock referred to includes both existing owner-occupied housing units as well as

existing rental housing projects. Lead based paint hazards are the number one housing quality concern for Vermont. The number of homes with incomplete plumbing or kitchens, and overcrowding appear to be very small.

Outcome Indicators for Rental Projects Rehabilitated:

- Number of rental rehab projects located in a downtown.

Of total units rehabilitated:

- Number affordable
- Number Section 504 accessible
- Number brought from substandard to standard condition (HQS or local code)
- Number qualified as Energy Star
- Number brought into compliance with lead safe housing rule (24 CFR part 35)
- Number of units with appropriate wiring for broadband access

Of affordable units:

- Number occupied by elderly
- Number subsidized with project-based rental assistance
- Number of years of affordability
- Number of housing units designated for person with HIV/AIDS, including those receiving assistance for operations
- Number of units for the chronically homeless
- Number of units of permanent housing for homeless persons and families, of those, the number made Section 504 accessible.

Outcome Indicators for Owner Occupied Units Rehabilitated or Improved:

- Number occupied by elderly
- Number of units brought from substandard to standard condition (HQS or local code)
- Number of units qualified as Energy Star
- Number of units brought into compliance with lead safe rule
- Number of units made handicapped accessible
- Number of units located in a downtown

Goal: Provide Housing for People with Disabilities, including housing aimed at avoiding or alleviating homelessness.

An estimated 5,400 Vermonters were homeless in 2008 with approximately 3,750 of those being sheltered and 1,650 not sheltered. During a one-day count in January 2009, 46% of people who were homeless were children and adults in families, including 754 children under age 17.

Outcome Indicators

- Unduplicated Number of homeless persons given overnight shelter
- Number of beds created in overnight shelter or other emergency housing
- Number of households that received emergency financial assistance to prevent homelessness (specifically rental assistance programs, emergency assistance through the Department of Children and Families, and back rent programs).

- Number of households that received emergency legal assistance to prevent homelessness.
- Number of participants enrolled and attending educational and literacy programs.
- Number of service-enriched units
- Unduplicated number of families moving from shelter to transitional housing
- Unduplicated number of families moving from shelter into permanent housing
- Number of participants seeking employment who obtain it
- Unduplicated number of participants receiving financial assistance or non-cash benefits

Goal: Provide Housing for Elders

Outcome Indicators

- Number occupied by elderly
- Number of units made handicapped accessible
- Number affordable
- Number of units located in a downtown
- Number of service-enriched units

Goal: Increase Homeownership Opportunities and Sustain Homeownership

Outcome Indicators

- Number of first-time homebuyers
- Of first time homebuyers, number receiving housing counseling
- Of first time homebuyer, number of minorities assisted
- Number receiving down-payment assistance and/or assistance with closing costs.
- Number of subsidized mortgages provided

Priority – Public Facility

Goal: Downtown Preservation and Revitalization

Outcome Indicators

- Number of public infrastructure and public facility projects located in a downtown
- Number of underutilized or vacant properties put back in use

Goal: Remediate and Reuse Brownfields

Vermont has brownfield sites that are located in areas prime for redevelopment and reuse-close to, or in our downtowns. Most of the sites have adequate infrastructure due to their downtown location. A state priority is to develop, redevelop or reuse these sites.

Outcome Indicators

- Number of acres of brownfields remediated

- Number of brownfield sites remediated and reused located in a downtown
- Other indicators as appropriate to end-use (i.e., housing, economic development, public facility)

Goal: Increase access to Public Facility

Outcome Indicators

Number of persons assisted:

- With new access to a facility or infrastructure benefit
- With improved access to a facility or infrastructure benefit
- Where activity was used to meet a quality standard or measurable improved quality, report number of households that no longer only have access to a substandard facility or infrastructure

Priority: Public Service

Goal: Increase access to Public Services

Assist communities with public service projects that support services that facilitate job creation and or retention, create/retain housing opportunities, or that provide services to low and moderate income persons, or to persons with special needs.

Outcome Indicators

Number of persons assisted:

- With new access to a service
- With improved access to a service
- Where activity was used to meet a quality standard or measurably improved quality, report number of households that no longer only have access to substandard service

9. Monitoring

The Department will develop and implement a monitoring plan that will track the progress in meeting the priorities and goals of the Consolidated Plan and ensure compliance with all federal and state laws, regulations, and policies.

Monitoring will be focused on three areas:

1. Progress being made in meeting the goals and priorities of the Consolidated Plan;
2. Timeliness of distribution of the federal funds; and
3. Compliance with regulatory requirements.

Monitoring of Progress

The State's housing and community development programs will submit progress reports to DEHCD on a regular basis which outline how resources have been allocated in accordance with priorities, including timeliness of fund distribution.

Timeliness of Fund Distribution

Federal funds administered by the Department flow through accounts controlled by the Department with a requisition process being used to reimburse recipients. There will be a continual monitoring of each account using computerized databases: (a) State Vision System; (b) Federal System - Integrated Disbursement and Information System (IDIS); and (c) Department database to compare actual expenditures against spending plans. Other funding programs will report to the Department regarding timeliness of fund distribution.

Compliance with Regulatory Requirements

Generally, site visit monitoring and progress reports will be used to ensure that funds are being used in compliance with program requirements. For existing federal programs administered by the Department, one site monitoring visit will be conducted on a risk-based approach, taking into account the complexity of projects, staff changes, past performance and level of experience of the program managers and administrators, the level of expenditures and the number of requisitions, a review of progress reports, and in some cases, the dollar threshold. Progress reports are required on a regular basis, at a minimum, annually. Progress of sub-recipients will be monitored by recipients in a similar manner. The Department may request copies of all progress reports from sub-recipients and will include a review of all monitoring activities of recipients at each site visit. The site visits will monitor compliance with requirements, such as national objectives, economic development, housing, public service, public facilities, civil rights/equal opportunity, contracts, procurement, environmental review, labor standards, acquisition/relocation, Uniform Relocation Act (URA), financial management, and program performance and inspection of all construction activities. Recipients are required to submit certifications of their intent to comply with program requirements.

A Grants Management Manual produced by the Department is used in the CDBG Program and supplied to each recipient. This provides written quality standards and performance/production guidelines for all programs and contains copies of all pertinent laws, regulations, policies, and procedures. In addition, CDBG maintains current information on the department website. The VHCB has developed a similar handbook for HOME grantees.

Monitoring through Technical Assistance

The Grants Management staff provides consistent technical assistance in all areas of compliance to the Grantees, subrecipients, administrators and contractors which supplements and enhances materials and documentation in the Grants Management Guide found on the website. Through dialogue and fielding questions on the specific projects, informal monitoring takes place on an ongoing basis which provides the staff with opportunities for intervention of any compliance issues. Further, the Grants Management staff is responsible for the draw down of the federal funds which provides another status update and progress of the Grants.

Appendix A

2010 – 2015 Consolidated Plan Advisory Group (2011)

Kim Brittenham

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** disabilities*

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Vermont Housing Finance Agency
Burlington
** housing, LIHTC*

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Greater Burlington Industrial Corporation
Burlington
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Agency of Human Services
Waterbury
** health, homelessness, lead paint*

Joan Goldstein

Green Mountain Economic Development Corp.
White River Junction
** economic development*

Steve Greenfield

Vermont Economic Development Authority
Montpelier
** economic development, public facilities*

Peter Gregory

Two Rivers Ottauquechee RPC
Woodstock
** municipal*

Debbie Ingram

Vermont Interfaith Action
Burlington
** faith-based organization*

Scott Murphy

Town of Bennington
Bennington
** municipal*

Lenae Quillen-Blume

Vermont SBDC
Randolph Center
** economic development*

Kenn Sassorossi

Housing Vermont
Burlington
** assisted housing*

Gus Seelig

Vermont Housing and Conservation Board
Montpelier
** housing, assisted housing, HOME, lead paint, HOPWA*

Kevin Stapleton

CVOEO Fair Housing Project
Burlington
** fair housing*

Ed Willenbaker

Winooski Housing Authority
Winooski
**housing, public housing*

Richard Williams

Vermont State Housing Authority
Montpelier
** assisted housing, public housing, elderly*

Appendix B

Vermont Consolidated Plan Rural Housing Needs Communities

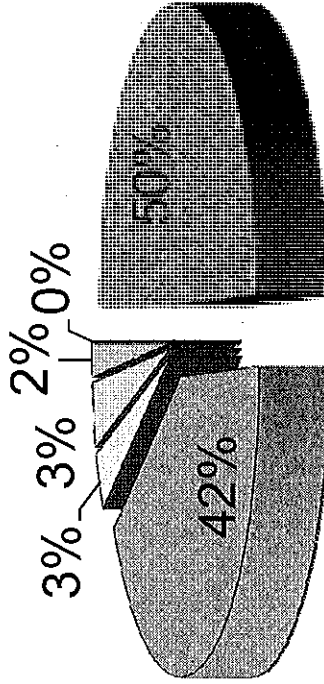
This is a list of Vermont communities that are estimated to have a high level of need for federal housing programs that include project based subsidies. This list will be incorporated into Vermont's plan effective July 1, 2011.

Alburg	Highgate	St. Albans City
Arlington	Hinesburg	St. Albans Town
Barnet	Huntington	St. Johnsbury
Barre City	Hyde Park	Stamford
Barre Town	Jericho	Starksboro
Barton	Johnson	Stowe
Bennington	Ludlow	Swanton
Bethel	Lunenburg	Troy
Bradford	Lyndonville	Vergennes
Brandon	Manchester	Waitsfield
Brattleboro	Middlebury	Warren
Brighton	Milton	Waterbury
Bristol	Montpelier	Weathersfield
Burlington*	Moretown	West Rutland
Cabot	Morristown	Westminster
Cambridge	Mt. Holly	Whitingham
Castleton	Newbury	Williamstown
Cavendish	Newport City	Williston
Charlotte	Northfield	Wilmington
Chester	Pawlet	Windsor
Clarendon	Pittsford	Winooski*
Colchester	Plainfield	Woodstock
Derby	Poultney	
Dorset	Pownal	
Dover	Putney	
East Montpelier	Randolph	
Enosburg	Readsboro	
Essex	Reap Zone For Caledonia, Essex & Orleans Counties**	
Essex Junction		
Fair Haven	Richford	
Fairfax	Richmond	
Fairfield	Rockingham	
Fairlee	Royalton	
Fayston	Rutland City	
Ferrisburg	Rutland Town	
Georgia	Shaftsbury	
Grand Isle	Shelburne	
Greensboro	Sheldon	
Groton	Shoreham	
Guilford	South Burlington*	
Hardwick	South Hero	
Hartford	Springfield	

* These communities are currently not eligible for Rural Development Programs; however, they continue to have a high housing need.

**REAP (Rural Economic Area Partnership) zone is an area in a state that has critical issues related to constraints in economic activity and growth, low density settlement patterns, stagnant or declining employment, and isolation that has led to disconnection from markets, suppliers, and centers of information and finance.

Grants Awarded in 2010



■ Economic Development	\$3,675,428
■ Housing	\$3,125,320
□ Planning	\$237,512
■ Public Facility	\$257,885
■ General Administration	\$132,671
■ Total	*\$7,428,816

*FY09 Allocation July 1, 2009 - June 30, 2010 plus Program Income

Appendix D: Outcomes and Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators
DH-1.1	<p>Availability, Accessibility, and Decent Housing</p> <p>Increase the Supply of Rental Housing Vermont has an insufficient supply of affordable rental housing across all types except the most expensive tier. This shortage causes stress in the rental housing market and exacerbates other housing problems. Although the needs differ widely by region, the state could easily absorb thousands of new rental housing units. Therefore, the state intends to support projects that increase the supply of affordable and workforce rental housing.</p>	<p>Federal – CDBG, HOME, Section 8 Certificates and Vouchers, HUD 202, Low Income Housing Tax Credits, USDA RD, RITC, Shelter Plus Care, Energy Programs</p> <p>Non-Federal – Vermont Housing and Conservation Board, VHFA, VSHA</p> <p>Private – VCCLF, Opportunities Credit Union, foundation or other grant funding, regional revolving loan funds, commercial banks</p>	<p># affordable units; # of accessible units; # of Energy Star units; # of new units constructed in designated downtowns and village centers; # of units occupied by elders; # of units with rental subsidies constructed or rehabilitated; # of units created to alleviate homelessness; # of units created for individuals or families with disabilities; # of service enriched units; # occupied by first-time homebuyers</p>
DH-1.2	<p>Preserve and Rehabilitate Existing Housing Stock Vermont has many units in need of significant investment. The existing housing stock includes both owner-occupied housing units and rental housing, including mobile home parks. Therefore, an important goal of this plan is to preserve and rehabilitate existing housing.</p>		
DH-1.3	<p>Provide Housing for People with Disabilities Special Needs Housing includes any project that incorporates a majority of persons with disabilities and provides service-enriched housing. Special needs populations include households or individuals who cannot live independently without supportive services such as; persons in need of transitional housing to avoid or alleviate homelessness; youth at risk; frail elders or persons with physical, sensory, cognitive, developmental and/or mental disabilities; or other populations where a combination of housing and supportive services will enhance the quality of life for both residents and the community at large.</p>		
DH-1.4	<p>Provide Housing for Elders Given the growth in our older population, and the extraordinary costs of providing long-term care services in institutional facilities, it is clear that the</p>		

Appendix D: Outcomes and Objectives

		<p>effects of these issues extend far beyond the current elderly population. By encouraging the development of dependable, affordable housing for elderly persons, we can reduce our health care costs, and help elderly residents get the care they need to age with dignity.</p> <p>DH-1.5 Support Home Ownership Vermont has a high homeownership rate; however, it is increasingly more difficult for renting households to achieve homeownership and for people to sustain the level of home-ownership. An objective of this plan is to enhance opportunities to sustain and increase homeownership among lower income families and individuals.</p>		
DH-2 Affordability and Decent Housing				
		<p>DH-2.1 Preserve and Rehabilitate Existing Housing Stock Vermont has many units in need of significant investment. The existing housing stock includes both owner-occupied housing units and rental housing, including mobile home parks. Therefore, an important goal of this plan is to preserve and rehabilitate existing housing.</p> <p>DH-2.2 Provide Housing for Elders Given the growth in our older population, and the extraordinary costs of providing long-term care services in institutional facilities, it is clear that the effects of these issues extend far beyond the current elderly population. By encouraging the development of dependable, affordable housing for elderly persons, we can reduce our health care costs, and help elderly residents get the care they need to age with dignity.</p> <p>Support Home Ownership Vermont has a high homeownership rate; however, it is increasingly more difficult for renting households to achieve homeownership. An objective of this plan is to enhance opportunities to increase homeownership among lower income families and individuals.</p>	<p>See Above</p>	<p>See Above</p>
DH-3 Sustainability of Decent Housing				
		<p>DH-3.1 Preserve and Rehabilitate Existing Housing Stock Vermont has many units in need of significant investment. The existing housing stock includes both owner-occupied housing units and rental housing, including mobile home parks. Therefore, an important goal of this plan is to preserve and rehabilitate existing housing.</p>	<p>See Above</p>	<p>See Above</p>

Appendix D: Outcomes and Objectives

<p>DH-3.2 Support Home Ownership</p>	<p>Vermont has a high homeownership rate; however, it is increasingly more difficult for renting households to achieve and sustain homeownership. An objective of this plan is to enhance opportunities to sustain homeownership among lower income families and individuals.</p>
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Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators
<p>SL-1 Availability/Accessibility of Suitable Living Environment</p>	<p>SL-1.1 Public Facilities While not the highest priority for VCDP funding, VCDP will continue to encourage public facility applications for community facility projects that are located in downtowns, villages, new neighborhoods, or growth centers; or that provide infrastructure for the creation and/or retention of jobs and housing units; or that remove barriers to accessibility by people with physical disabilities.</p>	<p>Federal – CDBG, USDA RD, RITC, EPA, Energy Programs Non-Federal – Vermont Housing and Conservation Board, municipal planning grants, cultural resources grants, Historic Preservation Grants Private – VCLF, commercial lenders, foundations, VCIL, AHS</p>	<p># of persons with new access to a facility or infrastructure benefit; # of persons with improved access to a facility or infrastructure benefit; # of public infrastructure and public facility projects located in a downtown</p>
<p>SL-2 Affordability of Suitable Living Environment</p>	<p>SL-2.1 Public Services While not the highest priority for VCDP funding, the VCDP will continue to encourage public service applications that support projects located in downtowns or growth centers, as defined elsewhere herein; provide services that support job creation and/or retention, or that support family self sufficiency; provide services that support housing; or that provide services to persons with special needs.</p>	<p>See above</p>	<p># of persons with new access to services or benefits; # of persons with improved access to services</p>
<p>SL-3 Sustainability of Suitable Living Environment</p>	<p>SL-3.1 Remediate and Reuse Brownfields The VCDP will continue to prioritize brownfield remediation and reuse as an important community development objective under the slums and blight criteria. It should be noted that other primary sources of brownfield funding are available and must be sought prior to application to the VCDP. In addition to all other applicable</p>	<p>Federal – EPA, ANR, USDA RD, Non-Federal – Vermont Housing and Conservation Board, municipal planning</p>	<p># of acres of brownfields remediated; # of brownfield sites remediated and reused located in a downtown; evaluate end-use (i.e., housing, economic development, public facility); # of public infrastructure and public facility projects located in a</p>

Appendix D: Outcomes and Objectives

	<p>program requirements, all brownfield projects must result in the reuse and occupation of the brownfield property within two years of receiving VCDP assistance.</p>	<p>grants, cultural resources grants, Historic Preservation Grants</p>	<p>downtown</p>
<p>SL-3.2 Downtown Preservation and Revitalization</p>	<p>A "Downtown" is the traditional central business district of a community, characterized by a cohesive core of multi-storied commercial buildings, often interspersed with civic, religious, and residential buildings and public spaces, arranged along a main street and intersecting side streets with public infrastructure in place, that have served as the center for socio-economic interaction in the community. With respect to State assistance and funding including CDBG, the State encourages and promotes development and growth in designated downtowns and village centers, growth centers, new neighborhoods and new town centers, whenever possible.</p>	<p>Private – VCCLF, commercial lenders, foundations, VCIL, AHS</p>	

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators
<p>EO-1</p>	<p>Availability/Accessibility of Economic Opportunity</p>		
<p>EO-1.1</p>	<p>Job Creation and Job Retention Accordingly, the highest priority for the use of VCDP assistance for economic development activities through this plan will be focused on retaining and creating jobs, striving for the best quality jobs attainable for lower income families and individuals. To support this priority, the state will assist businesses that create and retain jobs through a variety of activities including technical assistance, low interest loans for commercial acquisition and rehabilitation, telecommunications infrastructure and entrepreneurial training.</p>	<p>Federal - CDBG Non-Federal - VEDA, VCCLF, Private - commercial lenders</p>	<p># of jobs created and retained; # of jobs with employer sponsored health care; Types of jobs created; employment status before taking job created; unemployed rate; # of new businesses in operation after 3 years; # of businesses assisted; # of businesses assisted in designated downtowns and village centers</p>

Appendix D: Outcomes and Objectives

EO-2	<p>Affordability of Economic Opportunity</p>		
2.1	<p>Job Creation and Job Retention Accordingly, the highest priority for the use of VCDP assistance for economic development activities through this plan will be focused on retaining and creating jobs, striving for the best quality jobs attainable for lower income families and individuals. To support this priority, the state will assist businesses that create and retain jobs through a variety of activities including technical assistance, low interest loans for commercial acquisition and rehabilitation, telecommunications infrastructure and entrepreneurial training.</p>	See above	See Above
EO-3	<p>Sustainability of Economic Opportunity</p>		
3.1	<p>Job Creation and Job Retention Accordingly, the highest priority for the use of VCDP assistance for economic development activities through this plan will be focused on retaining and creating jobs, striving for the best quality jobs attainable for lower income families and individuals. To support this priority, the state will assist businesses that create and retain jobs through a variety of activities including technical assistance, low interest loans for commercial acquisition and rehabilitation, telecommunications infrastructure and entrepreneurial training.</p>	See above	See Above

STATE CERTIFICATIONS

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

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant

officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the State'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 paragraphs 1 and 2 of this 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 State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

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

Joelle Paul 5/9/11
Signature/Authorized Official Date

COMMISSIONER, DEHCD
Title

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

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

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 200_ , __, and __. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. **Special Assessments.** The state will require units of general local government that receive CDBG funds to certify to the following:

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.

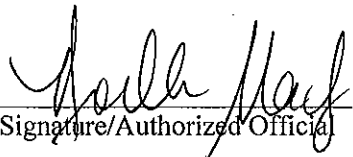
It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.


Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

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

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

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


Signature/Authorized Official


Date

Commissioner, DEHCD
Title

ESG Certifications

The State seeking funds under the Emergency Shelter Program (ESG) certifies that it will ensure that its recipients of ESG funds comply with the following requirements:

Major rehabilitation/conversion -- In the case of major rehabilitation or conversion, it will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 10 years. If the rehabilitation is not major, the recipient will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 3 years.

Essential Services and Operating Costs -- Where the assistance involves essential services or maintenance, operation, insurance, utilities and furnishings, it will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure as long as the same general population is served.

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

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

Matching Funds -- It will obtain matching amounts required under 24 CFR 576.51 and 42 USC 11375, including a description of the sources and amounts of such supplemental funds, as provided by the State, units of general local government or nonprofit organizations.

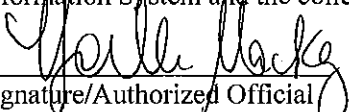
Confidentiality -- It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project except with the written authorization of the person responsible for the operation of that shelter.

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

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

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

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


Signature/Authorized Official _____ Date 5/22/11

Commissioner, DEHCD
Title

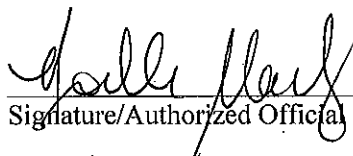
HOPWA Certifications

The State 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 the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

 5/19/11
Signature/Authorized Official Date

Commissioner DEHCD
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. 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.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies. (This is the information to which jurisdictions certify).
4. For grantees who are individuals, Alternate II applies. (Not applicable jurisdictions.)
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check ___ if there are workplaces on file that are not identified here; The certification with regard to the drug-free workplace required by 24 CFR part 24, subpart F.

9. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C.812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

GLOSSARY

General Definitions used with the CHAS

Affordable Housing: Affordable housing is generally defined as housing where the occupant is paying no more than 30 percent of gross income for gross housing costs, including utility costs. Affordable housing has a more specific definition for purposes of completing Table 5B. That definition is included in the instructions for Table 5B.

Committed: Generally means there has been a legally binding commitment of funds to a specific project to undertake specific activities, or an obligation of funds to a State recipient. Expanded definitions for completing Table 4/5A are included in the instructions for Table 4/5A.

Cost Burden > 50% (Severe Cost Burden): The extent to which gross housing costs, including utility costs, exceed 50 percent of gross income, based on data published by the U.S. Census Bureau.

Disabled Household: A household composed of one or more persons at least one of whom is an adult (a person of at least 18 years of age) who has a disability. A person shall be considered to have a disability if the person is determined to have a physical, mental or emotional impairment that: (1) is expected to be of long-continued and indefinite duration; (2) substantially impedes his or her ability to live independently, and (3) is of such a nature that the ability could be improved by more suitable housing conditions. A person shall also be considered to have a disability if he or she has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001-6006). The term also includes the surviving member or members of any household described in the first sentence of this paragraph who were living in an assisted unit with the deceased member of the household at the time of his or her death.

Economic Independence and Self-Sufficiency Programs: Programs undertaken by Public Housing Agencies (PHAs) to promote economic independence and self-sufficiency for participating families. Such programs may include Project Self-Sufficiency and Operation Bootstrap programs that originated under earlier Section 8 rental certificate and rental voucher initiatives, as well as the Family Self-Sufficiency program. In addition, PHAs may operate locally developed programs or conduct a variety of special projects designed to promote economic independence and self-sufficiency.

Elderly Household: A family in which the head of the household or spouse is at least 62 years of age.

Existing Homeowner: An owner-occupant of residential property who holds legal title to the property and who uses the property as his/her principal residence.

Family: A household comprised of one or more individuals.

Family Self-Sufficiency (FSS) Program: A program enacted by Section 554 of the National Affordable Housing Act which directs Public Housing Agencies (PHAs) and Indian Housing Authorities (IHAs) to use Section 8 assistance under the rental certificate and rental voucher programs, together with public and private resources to provide supportive services, to enable participating families to achieve economic independence and self-sufficiency.

First Time Homebuyer: An individual or family who has not owned a home during the three-year period preceding the HUD-assisted purchase of a home that must be used as the principal residence of the homebuyer.

FmHA: The Farmers Home Administration, or programs it administers.

For Rent: Year round housing units which are vacant and offered/available for rent. (U.S. Census definition)

For Sale: Year round housing units which are vacant and offered/available for sale only. (U.S. Census definition)

Group Quarters: Facilities providing living quarters that are not classified as housing units. (U.S. Census definition). Examples include: prisons, nursing homes, dormitories, military barracks, and shelters.

HOME: The HOME Investment Partnerships Act, which is Title II of the National Affordable Housing Act.

HOPE 1: The HOPE for Public and Indian Housing Homeownership Program, which is Title IV, Subtitle A of the National Affordable Housing Act.

HOPE 2: The HOPE for Homeownership of Multifamily Units Program, which is Title IV, Subtitle B of the National Affordable Housing Act.

HOPE 3: The HOPE for Homeownership of Single family Homes program, which is Title IV, Subtitle C of the National Affordable Housing Act.

Household: One or more persons occupying a housing unit, (U.S. Census definition). Note: A special definition of household is used for Table 1B, Supportive Housing and Services Population. Table 1B Instructions provide a special definition of Ahousehold@ as it is used in Table 1B.

Housing Problems: Households with housing problems include those that: (1) occupy units meeting the definition of Physical Defects; (2) meet the definition of Overcrowded; or (3) meet the definition of Cost Burden > 30%. Table 1A requests nonduplicative counts of household that meet one or more of these criteria.

Housing Unit: An occupied or vacant house, apartment, or a single room (SRO housing) that is intended as separate living quarters. (U.S. Census definition)

Institutions/Institutional: Group quarters for persons under care or custody. (U.S. Census definition)

Large Related: A household of 5 or more persons which includes at least 2 related persons.

LIHTC: (Federal) Low Income Housing Tax Credit.

Low Income: Households whose incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD=s findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes. Note: HUD income limits are updated annually and are available from local HUD offices for the appropriate jurisdictions.

Middle Income: Households whose incomes are from 96 to 120 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD=s findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes. If income adjustments are made by HUD and the low income limit for the area is set at higher or lower than 80 percent of median income, the middle income limits must be adjusted by multiplying the adjusted low income limit by 1.5. Example: With a median income for the area of \$10,000 and a low income limit adjusted by HUD to \$7,500, the adjusted middle income limit would be computed as: \$7,500 X 1.5 = \$11,250 adjusted middle income limit.

Moderate Income: Households whose incomes are between 81 percent and 95 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD=s findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes. If income adjustments are made by HUD and the low income limit for the area is set at higher or lower than 80 percent of median income, the moderate income limits must be adjusted by multiplying the adjusted low income limit by 1.1875. Example: With a median income for the area of \$10,000 and a low income limit adjusted by HUD to \$7,500, the adjusted moderate income limit would be computed as: \$7,500 X 1.1875 = \$8,906 adjusted moderate income limit.

Moderate Rehabilitation: Rehabilitation of residential property at an average cost for the project not in excess of \$25,000 per dwelling unit.

Note: Terms not defined above may be defined in the specific instructions for each table. If a term is not defined, the jurisdiction is to provide its own definition.

Needing Rehab: Dwelling units that do not meet standard conditions but are both financially and structurally feasible for rehabilitation. This does not include units that require only cosmetic work, correction of minor livability problems or maintenance work.

Non-Elderly Household: A household which does not meet the definition of an Elderly Household as defined above.

Non-Institutional: Group quarters for persons not under care or custody. (U.S. Census definition used in Table 2A).

Not Rehabbable: Dwelling units that are determined to be in such poor condition as to be neither structurally nor financially feasible for rehabilitation.

Occupied Housing Unit: A housing unit that is the usual place of residence of the occupant(s).

Other Household: A household of one or more persons that does not meet the definition of a Small Related household or a Large Related household, or is an elderly household comprised of 3 or more persons.

Other Income: Families or households whose incomes exceed 80 percent of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families.

Other Low Income: Households whose incomes are between 51 percent and 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Other Persons With Special Needs: Includes frail elderly persons, persons with AIDS, disabled families, and families participating in organized programs to achieve economic self-sufficiency. This category does not include homeless. (See Volume 1)

Other Vacant: Vacant year round housing units that are not For Sale, For Rent, or Vacant Awaiting Occupancy or Held. (U.S. Census definition)

Overcrowded: A housing unit containing more than one person per room. (U.S. Census definition used in Table 1A.)

Owner: A household that owns the housing unit it occupies. (U.S. Census definition)

Physical Defects: A housing unit lacking complete kitchen, bathroom, or electricity (U.S. Census definition used in Table 1A.) Jurisdictions may expand upon the Census definition.

Project-Based (Rental) Assistance: Rental Assistance provided for a project, not for a specific tenant. Tenants receiving project-based rental assistance give up the right to that assistance upon moving from the project.

Public Housing CIAP: Public Housing Comprehensive Improvement Assistance Program.

Public Housing MROP: Public Housing Major Reconstruction of Obsolete Projects.

Rent Burden >30% (Cost Burden): The extent to which gross rents, including utility costs, exceed 30 percent of gross income, based on data published by the U.S. Census Bureau.

Rent Burden >50% (Severe Cost Burden): The extent to which gross rents, including utility costs, exceed 50 percent of gross income, based on data published by the U.S. Census Bureau.

Renter: A household that rents the housing unit it occupies, including both units rented for cash and units occupied without cash payment of rent. (U.S. Census definition)

Renter Occupied Unit: Any occupied housing unit that is not owner occupied, including units rented for cash and those occupied without payment of cash rent.

Section 215: Section 215 of Title II of the National Affordable Housing Act. Section 215 defines what constitutes affordable housing projects under the Title II HOME program.

Service Needs: The particular services identified for special needs populations, which typically may include transportation, personal care, housekeeping, counseling, meals, case management, personal emergency response, and other services to prevent premature institutionalization and assist individuals to continue living independently.

Severe Cost Burden: See Cost Burden >50%.

Sheltered: Families and persons whose primary nighttime residence is a supervised publicly or privately operated shelter (e.g., emergency, transitional, battered women, and homeless youth shelters; and commercial hotels or motels used to house the homeless). Sheltered homeless does not include any individual imprisoned or otherwise detained pursuant to an Act of Congress or State law.

Small Related: A household of 2 to 4 persons which includes at least two related persons.

Substantial Rehabilitation: Rehabilitation of residential property at an average cost for the project in excess of \$25,000 per dwelling unit.

Supportive Housing: Housing, including Housing Units and Group Quarters, that has a supportive environment and includes a planned service component.

Supportive Service Need in FSS Plan: The plan that PHAs administering a Family Self-Sufficiency program are required to develop to identify the services they will provide to participating families and the source of funding for those services. The supportive services may include child care; transportation; remedial education; education for completion of secondary or post secondary schooling; job training, preparation and counseling; substance abuse treatment and counseling; training in homemaking and parenting skills; money management, and household management; counseling in homeownership; job development and placement; follow-up assistance after job placement; and other appropriate services.

Supportive Services: Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, child care, transportation, and job training.

Tenant Assistance: Rental assistance payments provided as either project-based rental assistance or tenant-based rental assistance.

Tenant-Based (Rental) Assistance: A form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. The assistance is provided for the tenant, not for the project.

Total Vacant Housing Units: Unoccupied year round housing units. (U.S. Census definition)

Unsheltered: Families and individuals whose primary nighttime residence is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings (e.g., the street, sidewalks, cars, vacant and abandoned buildings).

Vacant Awaiting Occupancy or Held: Vacant year round housing units that have been rented or sold and are currently awaiting occupancy, and vacant year round housing units that are held by owners or renters for occasional use. (U.S. Census definition)

Vacant Housing Unit: Unoccupied year-round housing units that are available or intended for occupancy at any time during the year.

Very Low Income: Households whose incomes do not exceed 50 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, and for areas with unusually high or low incomes or where needed because of prevailing levels of construction costs or fair market rents.

Year Round Housing Units: Occupied and vacant housing units intended for year round use. (U.S. Census definition). Housing units for seasonal or migratory use are excluded.

Note: Terms not defined above may be defined in the specific instructions for each table. If a term is not defined, the jurisdiction is to provide its own definition.