

# State of South Carolina Consolidated Plan for Housing & Community Development

South Carolina 2019 Annual Action Plan, April 1, 2019 - March 31, 2020



**South Carolina**  
Department of Commerce  
Just right for business.

Community  
Development  
Block Grant

Community Development Block Grant  
HOME Investment Partnerships & National Housing Trust Fund  
Emergency Solutions Program  
Housing Opportunities for People with HIV/Aids

**State of South Carolina**  
**Consolidated Plan for Housing & Community Development**

**2019 Annual Action Plan**

Program Year: April 1, 2019 - March 31, 2020

*Community Development Block Grants*  
*HOME Investment Partnerships*  
*National Housing Trust Fund*  
*Emergency Solutions Grants*  
*Housing Opportunities for Persons with AIDS*

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## **AP-05 Executive Summary**

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

#### **1. Introduction**

The South Carolina 2019 Annual Action Plan falls under the 2016-2020 State Consolidated Plan for Housing and Community Development. This 2019 Plan represents the fourth annual plan under the 2016-2020 five year plan, and it encompasses five programs funded by the US Department of Housing and Urban Development (HUD): the Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund Program (NHTF), the Emergency Solutions Grants Program (ESG), and the Housing Opportunities for Persons with AIDS Program (HOPWA). South Carolina will receive \$34.2 million for the 2019 Plan year, which runs April 1, 2019 through March 31, 2020. This Plan identifies which of HUD's eligible activities have been prioritized as best able to serve the needs of South Carolina, using HUD funds that will be available during the 2019 Plan year.

The South Carolina Department of Commerce administers the CDBG Program; the State Housing Finance and Development Authority (SC Housing) administers the HOME Program and the NHTF Program; the South Carolina Department of Administration Office of Economic Opportunity administers the ESG Program; and the South Carolina Department of Health and Environmental Control (DHEC) administers the HOPWA Program. All four State agencies collaborated to complete this Plan, along with input from other state agencies, stakeholders, advocates, and community members. The SC Department of Commerce is the lead agency for the Plan's development.

The Plan content and format is dictated by the federal online HUD IDIS system, through which all states and direct local government recipients of HUD Con Plan funds must create Consolidated Plans and annual Action Plans, create projects and activities to be funded under the plan, submit requests for funding to disperse funds to recipients, report on accomplishments, and create a Consolidated Annual Performance and Evaluation Report (CAPER) each year. The entire process must be created in the federal IDIS system, using prescribed formats and including HUD-provided and state added content. The Plan is downloaded from IDIS and the contents reflect IDIS requirements. This current 2019 Annual Plan consists of this Executive Summary as well as two other sections: the Process Section, which describes the public input process for the 2019 program year, and the Annual Action Plan, which contains each Program's method of distribution for the year, anticipated goals and funding availability, as well as narrative sections addressing housing, special needs and homelessness.

Other resources available are coordinated with the Consolidated Plan programs but may be prioritized for different activities eligible under program guidelines and regulations. CDBG-DR Disaster assistance, for example, is managed by the South Carolina Disaster Recovery Office (DRO), which effective for the 2019 Program Year, is located within the SC Department of Administration. Activities undertaken with CDBG-DR funding for the 2015 Severe Storm and Hurricane Matthew are limited to housing rehabilitation and replacement for households affected by the related events. A separate Annual Action Plan for the 2015 Storm and amendments for Hurricane Matthew can be found on the DRO website at

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<https://www.scdr.sc.gov/2015severestorm/> and <https://www.scdr.sc.gov/hurricanemattthew/>. Progress reporting can be found on the DRO's SC Storm Recovery website at <https://scstormrecovery.com/program-progress/> and <https://scstormrecovery.com/program-progress-matthew/>.

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

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

HUD allows a broad range of activities for CDBG, HOME, NHTF, ESG, and HOPWA. CDBG provides resources for community development, which may include construction of public infrastructure, public facilities and public improvements; public services; activities relating to energy conservation and renewable energy resources; and assistance to local governments to help locate new or expand existing business and industry and create or retain jobs. HOME is used for multifamily housing activities, which for 2019 may include development of affordable rental housing, small rental development, short-term rental assistance and tenant-based rental assistance for low-income special needs households. NHTF is to be used in large part for rental housing for households at or below 30% of AMI or the federal poverty level, whichever is greater. Since no more than 10% of a state's annual allocation may be used for homeownership activities and State Housing manages other funds which can be used to address this need, HOME ceased funding this activity during Program Year 2018 and HOME funds will not be available for this activity in 2019. ESG funds projects which may include supportive services to homeless individuals and families, outreach to unsheltered homeless, emergency shelter/transitional housing, homelessness prevention and re-housing assistance to those who have become homeless. HOPWA is dedicated to the housing and supportive service needs of people living with HIV/AIDS and their families, which may include operational support for community-based housing facilities operations, tenant based rental assistance, short-term payments for rent, mortgage and utilities, and supportive services such as case management, substance abuse and mental health treatment, job training and placement assistance, and assistance with daily living.

Annual objectives and outcomes undertaken annually may include any of the following:

- New Affordable Rental Housing
- Operating Funds for Facility-Based Housing Units
- Tenant-based Rental Assistance
- Short-Term Rent, Mortgage & Utility Assistance
- Homeless Prevention & Rapid Re-Housing
- Preserve Existing Affordable Housing
- New or Upgraded Public Infrastructure & Facilities
- Homeless Shelter, Services & Outreach
- Supportive Services for People with HIV/AIDS
- Neighborhood Revitalization
- Community and Regional Planning

## AP-05 Executive Summary

- Support New or Retention of Existing Jobs
- Community Economic Development

### 3. Evaluation of past performance

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

The State is currently implementing the Annual Plan for Program Year 2018, which is the third year of the 2016-2020 Consolidated Plan period. Actual accomplishments for 2018 will be reported in June 2019, but past accomplishments are available for prior plan years. For 2017, the CDBG, HOME, NHTF, ESG and HOPWA programs made a total of \$32.9 million available to recipients. These funds could be used, in addition to other available resources, to address the state's priority needs and objectives. Distribution of funds was in accordance with each program's Annual Action Plan. The state's success in achieving its goals and objectives using the funds available for program year 2017 is described in the state's Consolidated Annual Performance and Evaluation Report (CAPER), which is available online at [www.cdbgSC.com](http://www.cdbgSC.com). Significant accomplishments were achieved by each program - below are highlights of 2017 performance and accomplishments.

- 60,191 people benefited from community economic development activities aimed at improving or upgrading public facilities, infrastructure or services in commercial and downtown areas of predominantly LMI communities
- 3,219 people benefited from neighborhood revitalization projects in LMI communities that will comprehensively address community livability and sustainability through new or improved public facilities, infrastructure or services
- 16,866 persons benefited from community infrastructure projects that will address the availability or quality of public water/sewer and other infrastructure to ensure a suitable living environment for predominantly LMI communities
- 1 economic development project was provided assistance to help create 150 new jobs primarily low to moderate income residents
- 228 new affordable rental units were created
- 276 households received direct financial assistance to homebuyers\*
- 2,205 households received rapid re-housing assistance
- 316 persons benefited from homelessness prevention activities
- 7,542 homeless persons were assisted with overnight shelter or outreach activities
- 10 housing units for persons with HIV/AIDs were provided with operating funds
- HOME and HOPWA together assisted 305 people with tenant based rental assistance and an additional 252 eligible households with short-term rent, mortgage and utility assistance
- 1,606 HOPWA-eligible people will receive supportive services

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\* Note that direct homeownership assistance was an activity funded during the first three years of the Consolidated Plan period, but funding for this activity was halted during 2018 and accomplishments for the current year, when reported in June 2019, will show a marked decrease. No funding is planned for 2019.

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

*Summary from citizen participation section of plan.*

The State certifies that it has adopted and is following a recently revised Citizen Participation (CP) Plan. Additions to the State's Citizen Participation Plan were required in order to comply with the Affirmatively Furthering Fair Housing Final Rule at 24 CFR Parts 5, 91, 92, et al. Even though HUD has temporarily rescinded the requirement to conduct an Assessment of Fair Housing, the State's CP plan still provides for public comment on the AFH process. As amended, the CP Plan sets forth the State's policies and procedures for citizen participation and provides for and encourages citizens participation in the development of the Consolidated Plan, each Annual Action Plan, the State's Assessment of Fair Housing (when required by HUD for states), substantial amendments made to the Consolidated Plan, and each year's Consolidated Annual Performance Report.

Specific emphasis is placed on the participation of low and moderate income persons, including minorities, non-English speaking persons, persons with Limited English Language Proficiency (LEP), and persons with disabilities, and particularly on those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods.

The State is required to keep appropriate records, such as newspaper notices of hearings, minutes of those public hearings, and responses to comments and inquiries, to demonstrate that the CP Plan is being followed. Specifically:

Requirement: Prior to the publication of the Action Plan, the State will provide for local government and citizen participation by holding a public hearing and by making the proposed plan available for public review. At the public hearing, the State will furnish citizens, local governments, public agencies, and other interested parties information on the following: amount of assistance the State expects to receive; the range of activities which may be undertaken, including the estimated amount that will benefit low and moderate income persons; and the plans to minimize displacement of persons and to assist any persons displaced.

- ***The State complied with its CP requirement by holding its 2019 public hearing on January 24, 2019, at which the amount of anticipated assistance, activities to be undertaken, the amount to benefit LMI and minimization of displacement were discussed. The State also made the draft Action Plan document available for public review from January 7 through February 5, 2019.***

Requirement: The State will notify citizens about the dates of the Action Plan public comment period in at least one newspaper of general circulation in the state and utilize additional means of notification, as

## AP-05 Executive Summary

appropriate and using technology that may be available, including fax or email notifications and internet/web posting of notices. The advertised public notice and any other notices will identify the means by which copies can be downloaded or otherwise obtained and for review, and email and physical addresses for submitting comments.

- ***The State provided public notice using three of the state's newspapers of general circulation (The State, the Greenville News and the Charleston Post & Courier), by posting copies of the notices online and by sending notifications via email and newsletters. Notices provided citizens with information regarding the availability of the Plan and each Program's documents, the date and location of the public hearing, and the timing of the 30-day public comment period. The notice also made citizens aware that they could download copies of the Plan from Program websites or review them at COG regional offices or one of the Program offices. Finally, the notice indicated where to send written comments and the deadline for doing so.***

### 5. Summary of public comments

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

During the public comment period, which ran from January 7, 2019 to February 5, 2019, the State made the draft plan available to the public for review. The State also held a public hearing on January 24, 2019. Notice of the availability of the draft plan and the public hearing were published in The State, the Charleston Post & Courier and the Greenville News on January 6, 2019, in addition to being posted on [www.cdbgSC.com](http://www.cdbgSC.com) and [www.schousing.com](http://www.schousing.com). The notice provided instructions on how to submit comments regarding the Plan, and this was also discussed during the public hearing. The public hearing provided an opportunity for citizens in attendance to make comments for the record. No comments were received at the hearing, and no comments were subsequently received by CDBG, ESG or HOPWA. HOME did receive numerous comments and posted all comments and the Housing Authority's response to them on their website. All comments and responses are included in the attachments to this Plan.

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

All comments received were carefully considered and the responses provided indicated the reasons for accepting them or not. All comments and responses are included in the attachments to this Plan.

### 7. Summary

## PR-05 Lead & Responsible Agencies

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

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

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

| Agency Role                 | Name           | Department/Agency                                |
|-----------------------------|----------------|--|
| Lead Agency                 | SOUTH CAROLINA | SC Department of Commerce                        |
| CDBG Administrator          | SOUTH CAROLINA | SC Department of Commerce                        |
| HOPWA Administrator         | SOUTH CAROLINA | SC Dept of Health & Environmental Control (DHEC) |
| HOME Administrator          | SOUTH CAROLINA | SC Housing Finance & Development Authority       |
| ESG Administrator           | SOUTH CAROLINA | SC Department of Administration                  |
| National Housing Trust Fund | SOUTH CAROLINA | SC Housing Finance & Development Authority       |

**Table 1 – Responsible Agencies**

#### Narrative

Each of the five HUD programs covered by the Consolidated Plan are administered by different agencies, as indicated above. The Community Development Block Grant (CDBG) Program is administered by the SC Department of Commerce, the HOME and NHTF Programs by the SC State Housing Finance and Development Authority (SC Housing), the Emergency Solutions Grant (ESG) Program by the SC Office of Economic Opportunity and the HOPWA Program by the SC Department of Health and Environmental Control. The Lead Agency responsible for overseeing the development of the Consolidated Plan is the SC Department of Commerce.

CDBG-DR is not included in this Consolidated Plan, as it has separate Action Plan requirements, data systems and reporting requirements. Action Plan(s), amendments to Plans and program documents can be found on the program website: [www.scdr.sc.gov](http://www.scdr.sc.gov). Also, CDBG-DR is administered by the SC Disaster Recovery Office (DRO), which effective for Program Year 2019, will be housed within the SC Department of Administration.

#### Consolidated Plan Public Contact Information

General questions about the 2019 Action Plan and 2016-2020 Consolidated Plan should be directed to the SC Department of Commerce, which acts as the lead agency for the State. The SC Department of Commerce is located at 1201 Main Street, Suite 1600, Columbia, SC 29201. Phone (803) 734-0452 or email [jnewlands@scommerce.com](mailto:jnewlands@scommerce.com).

For housing questions, contact SC Housing. Phone (803) 896-9824 or email [jennifer.cogan@schousing.com](mailto:jennifer.cogan@schousing.com).

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

For homeless questions, contact the SC Office of Economic Opportunity. Phone (803) 734-2454 or email [gregg.mcconkey@admin.sc.gov](mailto:gregg.mcconkey@admin.sc.gov).

For special needs housing and HIV/AIDS questions, contact the SC Department of Health and Environmental Control HIV/STD Division. Phone (803) 898-0650 or email [odenl@dhec.sc.gov](mailto:odenl@dhec.sc.gov).

For non-housing or CDBG questions, contact the SC Department of Commerce. Phone (803) 734-0452 or email [lross@sccommerce.com](mailto:lross@sccommerce.com).

## AP-10 Consultation

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

#### 1. Introduction

This Annual Plan is part of the larger five-year Consolidated Plan for 2016-2020. The Consolidated Plan required and reflects the coordinated efforts of various state agencies, citizens and other organizations. The Plan is a comprehensive report, spanning multiple cross-jurisdictional areas of need, involving multiple agencies, programs and funding sources, and beyond the ability of a single entity or person to effectively develop. Instead, the cooperation and expertise of other agencies was necessary to develop a comprehensive plan based on accurate and pertinent data, effectively identifying goals, needs and strategies, and which could serve as an umbrella under which the state can undertake HUD-funded housing and community development in South Carolina. As such the Consolidated Plan describes the consultation and coordination efforts undertaken by the state and which served to inform the plan that governs this current 2019 Annual Plan.

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

SC Department of Health and Environmental Control staff responsible for administering the HOPWA Program also administer the Ryan White Care Act for the State, and Ryan White Care Act providers represent the entire spectrum of special needs housing, case management, health and mental health and other supportive services providers for people living with HIV/AIDs. Having the same entities manage programs and services funded by both HOPWA and Ryan White ensures a coordinated and seamless approach to service delivery. Additionally, SC DHEC includes a requirement that each project sponsor applying for State HOPWA assistance obtain approval from the unit of local government thus ensuring that each geographic area is aware of HOPWA funding resources.

SC Housing continues its joint venture with the Department of Mental Health to assist with affordable housing for their low-income target population. This includes an ongoing Tenant Based Rental Assistance program. Currently there are 44 tenants which receive rental assistance on a continuing basis.

SC Housing participates with other state and federal agencies through the use of memorandums of understanding documents (MOU) which provide a process to easily communicate and share information. Such MOUs speed up production of and decrease costs of affordable housing. Agencies SC Housing has entered into MOUs with include the US Department of Agriculture Rural Housing Service, the SC Department of Archives and History State Historic Office of Preservation, and the SC Department of Mental Health.

In addition to the Consolidated Plan partner agencies identified in PR-05, numerous other state agencies, non-profit organizations, public housing authorities, and continuums of care contributed to the development of the Consolidated Plan. These are described in detail in the 2016-2020 Consolidated Plan.

## AP-10 Consultation

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

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter and transitional housing facilities and operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina.

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

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina. ESG also requires potential subgrantees to receive an endorsement letter from the Continuum of Care in their area in order to apply for ESG funds each year. To further coordinate, ESG attends the Homeless Coalition bi-monthly meetings, along with all the Continuums of Care, meets with each HMIS lead agency, attends policy meetings and ESG staff volunteer for various Homeless Coalition committees.

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

|  |   |
|--|---|
| <b>Agency/Group/Organization</b>                               | Organizations Consulted during Development of the 2016-2020 Plan  |
| <b>Agency/Group/Organization Type</b>                          | Please see attachments to the Consolidated Plan   |
| <b>What section of the Plan was addressed by Consultation?</b> | Housing Need Assessment<br>Public Housing Needs<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Non-Homeless Special Needs |

## AP-10 Consultation

|  |   |
|--|---|
|  | HOPWA Strategy<br>Market Analysis<br>Economic Development<br>Anti-poverty Strategy<br>Lead-based Paint Strategy   |
| <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The state's 2016-2020 Consolidated Plan, AP-10 Consultation, Section 2 identifies fifty-six different organizations and the consultation the state had with them during the development of the Plan. Annually, State CDBG consults with the ten regional Councils of Government (COGs) at meetings held periodically during the year and has an ongoing dialogue throughout the year with the COGs and local governments in South Carolina. Application and Implementation Workshops held each year provide additional opportunities to discuss local and regional needs and issues with existing and potential CDBG grant recipients, interested local government officials and COG directors and community development staff. |

**Table 2 – Agencies, groups, organizations who participated**

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

Please refer to the AP-10 Consultation Section in the state's 2016-2020 Consolidated Plan.

Many additional organizations, representing additional agency types, were consulted during the development of the 2016-2020 Consolidated Plan, but IDIS limits the number of organizations that can be input into this section. As a result, not all are reflected in Section 2 of AP-10 of the Consolidated Plan. However, during the development of the Consolidated Plan, HOPWA consulted with Ryan White Care Act providers, via a public meeting focused on special needs housing. HOME also created an online survey to better identify affordable housing needs and assess how to best allocate available resources. An invitation to participate in the survey was emailed to over 1,500 affordable housing advocates.

## AP-10 Consultation

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

| Name of Plan      | Lead Organization          | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
|-------------------|----------------------------|--|
| Continuum of Care | United Housing Connections | There are four Continuum of Care entities in SC and the State consulted with all five: Eastern Carolina Homelessness Organization, Lowcountry Homeless Coalition, Midlands Area Consortium for the Homeless and United Housing Connections, which serves the Upstate region and also acts as the CoC Lead Organization. For consultation with the Lead and other CoC organizations, please see the narrative section, below. |

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

### Narrative

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program (ESG) meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina. ESG also requires potential subgrantees to receive an endorsement letter from the Continuum of Care in their area in order to apply for ESG funds each year. To further coordinate, ESG attends the Homeless Coalition bi-monthly meetings, along with all the Continuums of Care, meets with each HMIS lead agency, attends policy meetings and ESG staff volunteer for various Homeless Coalition committees.

## AP-12 Participation

### AP-12 Participation - 91.115, 91.300(c)

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

Per the State of South Carolina's Citizen Participation plan, input from the public and stakeholders was solicited by each of the five Consolidated Plan programs during the development of the 2016 - 2020 Consolidated Plan, which governs the current Action Plan. This is described fully in the Participation section of the state's 2016 - 2020 Consolidated Plan.

In preparation for the 2019 Annual Action Plan, the state continued to consult as it does throughout the plan period with its program constituents and interested parties, via meetings with program constituents, workshops, etc. Input received was considered during the development of the 2019 Plan and prior to finalizing the 2019 Plan. The Plan was made available in draft form for public review for a 30 day period extending from January 7, 2019 through February 5, 2019. A public hearing was also held on January 24, 2019 to discuss the 2019 Plan.

#### Citizen Participation Outreach

| Mode of Outreach | Target of Outreach           | Summary of response/ attendance   | Summary of comments received  | Summary of comments not accepted and reasons |
|------------------|------------------------------|---|---|--|
| Public Hearing   | Non-targeted/broad community | The public hearing was held on January 24, 2019. A public notice was published in three newspapers of general circulation and advertised the date, time and location of the public hearing. Mailings to constituents and notices published on Program websites also advertised the hearing. Sign in sheets were used to document attendance at the Public Hearing and will be maintained in the State's 2019 Action Plan files. . | No comments were received at the public hearing.  | Not applicable.                              |
| Newspaper Ad     | Non-targeted/broad community | Public notification ads were run in three newspapers of general circulation, in three regions of the state, on Sunday January 6, 2019. These ads announced the availability of the draft 2019 Annual Action Plan, the date, time and location of the public   | Comments were accepted from January 7, 2019 through February 5, 2019. No written comments were received other than those received by the Housing Authority in response to their outreach. These | Not applicable.                              |

## AP-12 Participation

| Mode of Outreach         | Target of Outreach   | Summary of response/ attendance  | Summary of comments received   | Summary of comments not accepted and reasons |
|--------------------------|--|--|--|--|
|                          |  | hearing held on January 24, 2019, and the start and end dates for the 30 days during which citizens and interested parties would be able to provide written comments on the plan. There is no specific attendance but the combined readership of The State, Greenville News, and Charleston Post & Courier is substantial and located throughout the state.  | comments and the Housing Authority's responses are summarized and included in the attachments to this final 2019 Action Plan.  |  |
| Internet Outreach        | Non-targeted/broad community                                   | The SC Department of Commerce Division of Grants Administration notified elected officials, local government administrators and other local government staff of the availability of the draft 2019 Plan and the 2019 public hearing via email on January 7, 2019. CDBG sent email notifications to 401 local government officials and staff in South Carolina, and to 48 regional Council of Government Directors and staff. | No comments were received.   | Not applicable.                              |
| Internet Outreach        | Affordable Housing Partners, Applicants and Other Stakeholders | SC Housing notified affordable housing partners, applicants, and other stakeholders of the availability of the Draft 2019 Annual Action Plan via its mass email tool Constant Contact.   | SC Housing has summarized public comments received regarding the 2019 HOME and NHTF Programs, and the Authority's corresponding responses. These are included as an attachment to this final 2019 Action Plan. | See Attachments to this Plan.                |
| HOME and NHTF Roundtable | HOME Stakeholders  | SC Housing held a Roundtable to discuss and take comments regarding the Small Rental Development program, which incorporates HOME, NHTF, and SC HTF to develop rental developments containing 8 - 16 units.  | SC Housing has summarized public comments received regarding the 2019 HOME and NHTF Programs, and the Authority's corresponding responses. These are included as an attachment to this final Plan.             | See Attachments to this Plan.                |

Table 4 – Citizen Participation Outreach

## AP-15 Expected Resources

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

#### Introduction

The state's 2019 allocations for CDBG, HOME, NHTF, HOPWA and ESG total \$34.2 million. This represents an increase over 2018 for ESG and HOPWA, almost level funding for CDBG and NHTF, and a slight decrease for HOME, as shown below.

#### Anticipated Resources

| Program | Source of Funds  | Uses of Funds   | Expected Amount Available Year 1 |                    |                           |            | Expected Amount Available Remainder of ConPlan \$ | Narrative Description  |
|---------|------------------|---|----------------------------------|--------------------|---------------------------|------------|---|--|
|         |                  |   | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources : \$ | Total: \$  |   |  |
| CDBG    | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services  | 20,128,358                       | 18,000             | 0                         | 20,146,358 | 13,000,000  | Funds available for the remainder of the 5-year Consolidated Plan period are estimated assuming an annual allocation of CDBG funds of at least \$13 million per year.                      |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 6,527,338                        | 2,040,000          | 1,900,000                 | 10,467,338 | 5,000,000   | Funds available for the remainder of the 5-year Consolidated Plan period are estimated assuming an annual combination of allocation and program income HOME funds of \$5 million per year. |
| HOPWA   | public - federal | Permanent housing in facilities<br>Permanent housing placement<br>Short term or transitional housing facilities<br>STRMU<br>Supportive services<br>TBRA             | 2,061,285                        | 0                  | 100,000                   | 2,161,285  | 1,000,000   | Funds available for the remainder of the 5-year Consolidated Plan period are estimated assuming an annual allocation of HOPWA funds of at least \$1 million per year.                      |

## AP-15 Expected Resources

| Program            | Source of Funds  | Uses of Funds  | Expected Amount Available Year 1 |                    |                           |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description   |
|--------------------|------------------|--|----------------------------------|--------------------|---------------------------|-----------|---|---|
|                    |                  |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources : \$ | Total: \$ |   |   |
| ESG                | public - federal | Conversion and rehab for transitional housing<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance Services<br>Transitional housing | 2,455,323                        | 0                  | 0                         | 2,455,323 | 2,000,000   | Funds available for the remainder of the 5-year Consolidated Plan period are estimated assuming an annual allocation of ESG funds of at least \$2 million per year. |
| HTF                | public - federal | Acquisition<br>Admin and Planning<br>Homebuyer assistance<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership                           | 3,000,000                        | 0                  | 3,040,000                 | 6,040,000 | 3,000,000   | See below, which cannot be deleted. The state will only receive one annual allocation for the HTF for 2019.   |
| Housing Trust Fund | public - federal | Admin and Planning<br>Housing<br>Multifamily rental new construction   | 0                                | 0                  | 0                         | 0         | 0   | Housing Trust Fund is a separate line above. Entering info here would indicate duplicated or double the amount of NHTF funding.                                     |

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

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

A number of other resources, including other federal, private, non-profit, local and state programs, can be used to address housing, community development and special needs. Much of the funding for housing and community development programs in particular originates from federal sources. Programs including HOME, NHTF, CDBG, Low Income Housing Tax Credits (LIHTCs), Section 8 rental assistance programs and Low Income Home Energy Assistance (LIHEAP), are allocated to states based on formulas. Other federal programs are available on a demonstration basis or through a competitive process on a national or regional level, and as such are more difficult to obtain and less secure as a long-term funding source. A complete list

## AP-15 Expected Resources

of federal resources for housing and community development is provided in the 2016-2020 Consolidated Plan.

State resources for housing include the various programs and the State Housing Trust Fund administered by SC Housing, which are described below. In addition, HUD requires the State to provide matching funds for the CDBG, HOME, and ESG Program allocations, as described below. The HOPWA nor NHTF programs do not require a match from the State of South Carolina for their allocation.

### **CDBG-DR**

Please see the Discussion section, below.

### **HOME**

The HOME program requires a 25 percent (25%) match. HOME program matching funds are provided by SC Housing through the State Housing Trust Fund. The SC HTF is a state-funded program created in 1992 to assist low-income households in all 46 counties. The fund receives a small portion of all documentary stamp taxes collected.

### **ESG**

The ESG Program requires a dollar-for-dollar match in non-ESG funds from the State for their allocation. To meet this requirement, the ESG Program requires that applicants provide a dollar-for-dollar match if they are awarded a grant. Match can be either in the form of a cash contribution or in other donated/in-kind resources such as the value of buildings, equipment, and volunteer services. The State is allowed to waive the match requirement for up to the first \$100,000 of its allocation for applicants who are least capable of leveraging local resources to meet the match.

### **HOPWA**

HOPWA does not require matching funds, but HOPWA funds awarded each year are the source of substantial leveraging. All DHEC HOPWA service providers, or sponsors, are also Ryan White service providers or collaborate closely with Ryan White service providers. Ryan White CARE Act resources are used for case management across the state, including housing service planning. HOPWA is also used to leverage the resources of non-profit organizations that receive HOPWA funding. The base Ryan White Part B award to South Carolina for 2018 was \$10.2 million.

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

The State does not own any land or property that may be used to address the needs identified in the plan.

## AP-15 Expected Resources

### Discussion

#### CDBG-DR

CDBG-DR funds allocated to assist with the aftermath of the 2015 Severe Storm (October Flood) and Hurricane Matthew have been prioritized for housing rehab and housing replacement for eligible affected individuals. One hundred percent of funds available during the 2019 Program year from these CDBG-DR allocations will be allocated to this activity. \$51 million remains to be expended from the 2015 Severe Storm allocation and \$73 million from Hurricane Matthew. The State estimates it will expend \$35 million during Program Year 2019.

The State's approved Action Plan for the 2015 Severe Storm and amendments, the amendment to the Plan for Hurricane Matthew and Quarterly Performance Reports (QPRs) can be found on the CDBG-DR Office website at <https://www.scdr.sc.gov/2015severestorm/> and <https://www.scdr.sc.gov/hurricanematthew/>. Progress is posted on the CDBG-DR <https://scstormrecovery.com> website. Additional CDBG-DR allocations are expected for Hurricane Florence and Disaster Mitigation. Funding availability, plans for distributing expected resources and activities to be funded will be detailed in Action Plan(s) that will be posted on the SC Disaster Recovery Office website at <https://www.scdr.sc.gov/#programs>. Please also see this website for additional program information, plans and reports.

## AP-20 Annual Goals & Objectives

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

| Goal #r | Goal Name  | Start Year | End Year | Category  | Geographic Area | Needs Addressed  | Estimated Funding  | Proposed 2019 Goal & IDIS Outcome Measure  |
|---------|--|------------|----------|---|-----------------|--|--|--|
| 1       | New Affordable Rental Housing                    | 2016       | 2020     | Affordable Housing                                  |                 | Affordable Housing   | HOME:<br>\$9,414,605<br>Housing Trust Fund:<br>\$5,740,000 | Rental units constructed: 130<br>Household Housing Unit  |
| 2       | Operating Funds for Facility-Based Housing Units | 2016       | 2020     | Affordable Housing<br>Non-Homeless<br>Special Needs |                 | Transitional and Supportive Housing  | HOPWA:<br>\$182,500  | HIV/AIDS Housing Operations: 10<br>Household Housing Unit  |
| 3       | Homeownership & Rental Assistance                | 2016       | 2018     | Affordable Housing                                  |                 | Homeownership Assistance   | HOME:<br>\$0   | Direct Financial Assistance to Homebuyers: 0<br>Households Assisted  |
| 4       | Tenant-based Rental Assistance                   | 2016       | 2020     | Affordable Housing<br>Non-Homeless<br>Special Needs |                 | TBRA Rental Assistance for People Living with HIV/AIDS & Others with Special Needs     | HOPWA:<br>\$558,000<br>HOME:<br>\$300,000                  | Tenant-based rental assistance / Rapid Rehousing: 150<br>Households Assisted   |
| 5       | Short-Term Rent, Mortgage & Utility Assistance   | 2016       | 2020     | Affordable Housing<br>Non-Homeless<br>Special Needs |                 | Short-term Rental Assistance for People Living with HIV/AIDS and Low Income Households | HOPWA:<br>\$313,318<br>HOME:<br>\$100,000                  | Tenant-based rental assistance / Rapid Rehousing: 175<br>Households Assisted   |
| 6       | Homeless Prevention & Rapid Re-Housing           | 2016       | 2020     | Homeless  |                 | Homeless Prevention and Rapid Re-Housing   | ESG:<br>\$810,256  | Tenant-based rental assistance / Rapid Rehousing: 100<br>Households Assisted<br>Homelessness Prevention: 175<br>Persons Assisted |
| 7       | Preserve Existing Affordable Housing             | 2016       | 2020     | Affordable Housing                                  |                 | Preservation of Existing Affordable Housing  | HOME:<br>\$0   | Rental units constructed: 0<br>Household Housing Unit  |

## AP-20 Annual Goals & Objectives

| Goal #r | Goal Name  | Start Year | End Year | Category                          | Geographic Area | Needs Addressed   | Estimated Funding  | Proposed 2019 Goal & IDIS Outcome Measure  |
|---------|--|------------|----------|-----------------------------------|-----------------|---|--------------------|--|
| 8       | Homeless Shelter, Services & Outreach              | 2016       | 2020     | Homeless                          |                 | Homeless Facilities and Services  | ESG: \$1,215,385   | Homeless Person Overnight Shelter: 3,000 Persons Assisted<br>Other -Outreach: 2,000 Other (Persons)                  |
| 9       | Supportive Services for People with HIV/AIDs       | 2016       | 2020     | Non-Homeless Special Needs        |                 | Supportive Services for People Living with HIV/AID  | HOPWA: \$805,668   | Other - Supportive Services: 1,500 Other (Persons Assisted)  |
| 10      | New or Upgraded Public Infrastructure & Facilities | 2016       | 2020     | Non-Housing Community Development |                 | Community Infrastructure, Facilities & Services   | CDBG: \$12,212,771 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted |
| 11      | Neighborhood Revitalization                        | 2016       | 2020     | Non-Housing Community Development |                 | Community Infrastructure, Facilities & Services<br>Community Revitalization                         | CDBG: \$811,737    | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted    |
| 12      | Community and Regional Planning                    | 2016       | 2020     | Non-Housing Community Development |                 | Community Infrastructure, Facilities & Services<br>Community Revitalization<br>Economic Opportunity | CDBG: \$500,000    | Other: 40 Other (Communities Assisted)   |
| 13      | Support New or Retention of Existing Jobs          | 2016       | 2020     | Economic Opportunity              |                 | Economic Opportunity  | CDBG: \$2,000,000  | Jobs created/retained: 25 Jobs<br>Businesses assisted: 1 Businesses Assisted   |

## AP-20 Annual Goals & Objectives

| Goal #r | Goal Name                      | Start Year | End Year | Category                          | Geographic Area | Needs Addressed   | Estimated Funding    | Proposed 2019 Goal & IDIS Outcome Measure   |
|---------|--------------------------------|------------|----------|-----------------------------------|-----------------|---|----------------------|---|
| 14      | Community Economic Development | 2016       | 2020     | Non-Housing Community Development |                 | Community Infrastructure, Facilities & Services<br>Community Revitalization<br>Economic Opportunity | CDBG:<br>\$3,000,000 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing<br>Benefit: 10,000 Persons Assisted |

**Table 6 – Goals Summary**

## AP-20 Annual Goals & Objectives

### Goal Descriptions

|    |                         |  |
|----|-------------------------|--|
| 1  | <b>Goal Name</b>        | New Affordable Rental Housing  |
|    | <b>Goal Description</b> | Increase the supply of affordable rental units for extremely low- to moderately low-income households.   |
| 2  | <b>Goal Name</b>        | Operating Funds for Facility-Based Housing Units   |
|    | <b>Goal Description</b> | Support transitional and supportive housing facilities for people with special needs   |
| 3  | <b>Goal Name</b>        | Homeownership & Rental Assistance  |
|    | <b>Goal Description</b> | Other funds managed by SC Housing will be used to address the Con Pan goal of improving affordability of homeownership housing for LMI families. Rental assistance is included in STRMU below (combined HOPWA/HOME goal).  |
| 4  | <b>Goal Name</b>        | Tenant-based Rental Assistance   |
|    | <b>Goal Description</b> | Provision of tenant-based rental assistance to make housing more affordable for those living with HIV/AIDS and other special needs   |
| 5  | <b>Goal Name</b>        | Short-Term Rent, Mortgage & Utility Assistance   |
|    | <b>Goal Description</b> | Address short-term housing instability by providing emergency assistance for people living with HIV/AIDS and address housing affordability by providing rental assistance for low income households through SC Housing   |
| 6  | <b>Goal Name</b>        | Homeless Prevention & Rapid Re-Housing   |
|    | <b>Goal Description</b> | Prevent homelessness and/or assist with rapid re-housing or transition to permanent housing  |
| 7  | <b>Goal Name</b>        | Preserve Existing Affordable Housing   |
|    | <b>Goal Description</b> | Make existing affordable housing more sustainable and preserve affordable housing stock. No CDBG or HOME funds are allocated for this goal for 2019 but CDBG-DR anticipates continued expenditure of remaining CDBG-DR funding on owner-occupied rehab.  |
| 8  | <b>Goal Name</b>        | Homeless Shelter, Services & Outreach  |
|    | <b>Goal Description</b> | Support organizations that provide emergency shelter or essential supportive services to homeless individuals and families, both sheltered and unsheltered, and/or that provide outreach to unsheltered homeless   |
| 9  | <b>Goal Name</b>        | Supportive Services for People with HIV/AIDS   |
|    | <b>Goal Description</b> | Provide supportive services and permanent housing placement services to persons with special needs to promote independent living.  |
| 10 | <b>Goal Name</b>        | New or Upgraded Public Infrastructure & Facilities   |
|    | <b>Goal Description</b> | Contribute to the creation of healthy and sustainable residential communities by providing funding for new or upgraded infrastructure, facilities or services, including water, sewer, roads, drainage or other activities that address health concerns, help meet required quality standards and ensure community sustainability, contribute to a more viable regional infrastructure solution, provide new access to services where needed to support business or community needs where it is cost effective to do so. |

## AP-20 Annual Goals & Objectives

|    |                         |  |
|----|-------------------------|--|
| 11 | <b>Goal Name</b>        | Neighborhood Revitalization  |
|    | <b>Goal Description</b> | Develop sustainable communities through revitalization of residential neighborhoods using comprehensive strategies for linking commercial revitalization successes with improvements to community neighborhoods. This typically involves multiple activities prioritized to address basic infrastructure and safety first and, where feasible, geographically concentrated in order to achieve the greatest impact. Eligible activities include infrastructure, public facilities, housing infrastructure or other activities to support workforce housing, demolition and clearance, and public services. |
| 12 | <b>Goal Name</b>        | Community and Regional Planning  |
|    | <b>Goal Description</b> | Assist local governments in developing plans and building local community development capacity to build the capacity to effectively determine community needs, establish both long-term goals and short-term objectives, and develop plans for carrying out effective strategies to address community needs. Accomplishments are measured in terms of the number of communities assisted.  |
| 13 | <b>Goal Name</b>        | Support New or Retention of Existing Jobs  |
|    | <b>Goal Description</b> | Support the creation or retention of jobs as a means of providing or expanding economic opportunity in the form of jobs to primarily low- and moderate-income individuals. The CDBG Business Development Program is the primary tool for accomplishing this by providing financial resources for local governments to pursue opportunities that create new jobs, retain existing employment, stimulate private investment, and revitalize or facilitate the competitiveness of the local economy.  |
| 14 | <b>Goal Name</b>        | Community Economic Development   |
|    | <b>Goal Description</b> | Help create more viable communities that can compete more effectively for new business development opportunities, provide more supportive environments for existing businesses to grow and thrive, and thereby create communities that are more sustainable and offer local residents greater quality of life and individual economic opportunity. The CDBG Community Enrichment Program is the primary tool for accomplishing this by funding public facilities, services and other activities that strengthen existing communities and support a higher quality of life.                                 |

**Estimate the number of extremely low-income, low-income and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

Extremely Low-Income - 100 households  
 Low-Income - 130  
 Moderately Low-Income - 275

## AP-25 Allocation Priorities

### AP-25 Allocation Priorities – 91.320(d)

#### Introduction:

Each Program has identified various programs or activities that will be funded during 2019, and that will directly contribute toward achieving the goals defined in this plan. Funding for each of these programs or activities are described in program-specific sections of AP-30, Method of Distribution. Each program's Method of Distribution section also describes other, allowable set-asides for program administration and other activities related to program delivery, and demonstrates compliance with the program caps for these activities. Such activities include program administration, technical assistance (CDBG), CHDOs (HOME), sponsor administration (HOPWA), and administration and HMIS (ESG).

The percentages below reflect the relative share of 2019 funding for each program or activity to be funded in 2019. Note that these percentages are calculated *after* allowable set-asides have been deducted from the total estimated allocation. These total 100%, indicating that, after allowable set-asides, all 2019 funding will be awarded to help achieve one of the program goals identified in this Annual Action Plan.

The set-aside activities are not included in the table below, which is automatically generated by IDIS and which cannot be modified by the State other than the percentages for the IDIS-generated columns and rows. These activities are, however, described in AP-30, Method of Distribution. All comply with pertinent program regulations and caps, as described in AP-30.

## Funding Allocation Priorities

|                          | New<br>Affordable<br>Rental<br>Housing<br>(%) | Operating<br>Funds for<br>Facility-<br>Based<br>Housing<br>Units<br>(%) | Home-<br>ownership<br>& Rental<br>Assistance<br>(%) | Tenant-<br>based<br>Rental<br>Assistance<br>(%) | Short-Term<br>Rent,<br>Mortgage<br>& Utility<br>Assistance<br>(%) | Homeless<br>Prevention<br>& Rapid<br>Re-Housing<br>(%) | Preserve<br>Existing<br>Affordable<br>Housing<br>(%) | Homeless<br>Shelter,<br>Services &<br>Outreach<br>(%) | Supportive<br>Services<br>for People<br>with<br>HIV/AIDs<br>(%) | New or<br>Upgraded<br>Public Infra-<br>structure &<br>Facilities<br>(%) | Neighbor-<br>hood<br>Revitaliz-<br>ation<br>(%) | Community<br>and<br>Regional<br>Planning<br>(%) | Support<br>New or<br>Retention<br>of Existing<br>Jobs<br>(%) | Community<br>Economic<br>Development<br>(%) | Total<br>(%) |
|--------------------------|---|---|---|---|---|--|--|---|---|---|---|---|--|---|--------------|
| CDBG                     |   |   |   |   |   |  | 0  |   |   | 68  | 4   | 3   | 10   | 15  | <b>100</b>   |
| HOME                     | 96  |   | 0   | 3   | 1   |  | 0  |   |   |   |   |   |  |   | <b>100</b>   |
| HOPWA                    |   | 10  |   | 30  | 17  |  |  |   | 43  |   |   |   |  |   | <b>100</b>   |
| ESG                      |   |   |   |   |   | 40   |  | 60  |   |   |   |   |  |   | <b>100</b>   |
| Housing<br>Trust<br>Fund | 100   |   |   |   |   |  |  |   |   |   |   |   |  |   | <b>100</b>   |

**Table 7 – Funding Allocation Priorities**

## **AP-25 Allocation Priorities**

### **Reason for Allocation Priorities**

The CDBG, HOME and NHTF, and ESG programs for 2019 are designed to address the three priority needs, Decent Housing, Suitable Living Environment, and Economic Opportunity. Allocation priorities are based on expected funding and program evaluation of relative need amongst the related objectives identified in the Plan.

#### **CDBG-DR**

CDBG-DR funds allocated in prior years for Hurricane Matthew and the 2015 Severe Storm (October Flood) have been prioritized for housing rehab and housing replacement for eligible individuals affected by the related events. One hundred percent of funds that remain to be disbursed and that will be available in 2019 will be allocated to this activity. The State's approved Action Plan for the 2015 Severe Storm and the amendment(s) to it for Hurricane Matthew can be found on the CDBG-DR website at <https://www.scdr.sc.gov/2015severestorm/> and <https://www.scdr.sc.gov/hurricanematthew/>. Progress is posted on the CDBG-DR Storm Recovery website at: <https://scstormrecovery.com>. Additional CDBG-DR allocations are expected in 2019 for Hurricane Florence and for Disaster Mitigation, but exact funding amounts have not yet been announced and Action Plans have not yet been submitted. When developed, Plans will be posted on the SC Disaster Recovery Office website at <https://www.scdr.sc.gov>, where additional information on all CDBG-DR allocations and activities can also be found.

#### **HOME**

For 2019, homeownership assistance will not be eligible for HOME funding. Other State Housing resources are available to address this need, and discontinuing HOME funding for this activity helps maximize HOME funds available for higher priority rental development and assistance activities. 100% of NHTF funds address rental development. This Method of Distribution will still directly impact priority needs and help accomplish goals and objectives.

#### **HOPWA**

DHEC allocates funding for TBRA, Facility based Supportive Housing, STRMU, PHP, and Supportive Housing. Each of these are successful in preventing homelessness of persons with HIV.

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

#### **CDBG**

Each year, the State establishes programs under which CDBG funds for the year will be distributed, generally through a competitive funding process. The programs, and the project types and activities eligible under each program, are those that reflect eligible uses of CDBG funding and that will help address priority

## **AP-25 Allocation Priorities**

needs and specific objectives described in the Consolidated Plan. However, as required by the State's method of distribution, CDBG funds are actually distributed to local governments through competitive funding rounds for most programs, and these local governments, if successful in receiving funding, then actually carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. In this way, the State makes CDBG funds available for priority activities identified in the Consolidated Plan that will directly impact priority needs and help accomplish goals and objectives.

Specific activities to be undertaken, however, are determined by the application process and the specific projects and activities proposed by the highest scoring applicants for CDBG funding. Applications received and projects awarded funding each year are described in the Consolidated Annual Performance and Accomplishment Report or CAPER. For more detailed information on the types of eligible activities, as well as the method of distribution for each program, refer to the program documents on the CDBG website at [www.cdbgSC.com](http://www.cdbgSC.com).

### **HOME and NHTF**

SC Housing develops annual applications in support of providers who conduct activities to address the priority needs and specific objectives as described in this plan. HOME and NHTF funds are distributed to local governments, nonprofit organizations and other entities to carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. Each year, funds are made available for some or all of the priority activities identified in the Strategic Plan, as indicated in the HOME and NHTF Method of Distribution sections and program documents that be be found on the State Housing website at [www.schousing.com](http://www.schousing.com). Specific activities to undertaken by HOME and/or NHTF recipients of funds are subject to the projects represented by applications received and program funding award decisions.

### **ESG**

The Emergency Solutions Grant Program plans to distribute its funds, after program admin and HMIS, as follows: Shelter/Street Outreach 60%, Homeless Prevention/Rapid Rehousing 40%. Program admin is 7.5% of the total and HMIS is 10%. Actual amounts may differ once all applications are received and scored, but shelter will not exceed 60%.

### **HOPWA**

DHEC serves all areas of the state except the two areas that are HOPWA entitlement communities (Columbia, Charleston and Greenville) and the counties that fall in North Carolina and Georgia HOPWA entitlement communities. DHEC distributes the funds to regional Ryan White Care Providers and/or eligible non-profit organizations that assist persons living with HIV/AIDS. Housing assistance through STRMU, PHP, and TBRA increases client's housing stability. Increasing use of supportive services in order to assist individuals in maintaining housing stability are critical and includes case management and transportation.

## **AP-30 Methods of Distribution**

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

#### **Introduction:**

Method of distribution refers to the means by which the state will distribute funds to be received by the five formula grant programs, CDBG, HOME, NHTF, ESG and HOPWA, each year.

Each program distributes funds to local governments, nonprofit organizations and other entities to carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. Funds are made available as described below, for priority activities identified in the Strategic Plan that will directly impact priority needs and help accomplish goals and objectives described in this Annual Plan. Program regulations also allow for a specified amount, typically a percentage of the total allocation, to be set aside for state or local recipient administration and other eligible activities, such as ESG HMIS administration, that do not directly contribute to accomplishments that will be reported in the performance report, but rather facilitate program delivery and accomplishment of goals. Compliance with applicable program caps and regulations is also addressed in the sections below.

- CDBG, HOME, and NHTF have established programs for 2019 designed to address the three priority needs, Decent Housing, Suitable Living Environment and Economic Opportunity, and related objectives identified in this Annual Plan. Programs and funding levels are provided under the Federal Resources section of this plan. Strategies, or specific activities and project types that potential funding recipients may propose, are described in each program's Method of Distribution and annual plan, along with scoring criteria applicable to the competitive programs and any other criteria used to select projects for funding. Note that homeownership assistance is no longer eligible for HOME funding beginning in 2019. This decision was made to maximize HOME funds available for affordable housing development and rental assistance, and in consideration of other State Housing funds available to address this need.
- ESG makes funds available through one competitive funding round each year and will do so again this year to distribute the 2019 allocation. Eligible nonprofits in the state may operate homeless shelters, transitional housing, homeless services programs, street outreach programs, or homeless prevention and re-housing programs and may request funds for any eligible activity defined in the program annual plan. These activities correspond to priority activities identified in this Annual Plan, and to the requirements and regulations governing the Emergency Solutions Program. Funding decisions are based on prior performance, applicant capacity, financial capacity, the proposed project, and other factors, as described in the ESG Method of Distribution and program documents that can be downloaded from the program's website.
- DHEC allocates HOPWA funding for TBRA, Facility Based Supportive Housing, STRMU, PHP, and Supportive Services. Each of these are successful in preventing homelessness of persons with HIV, as described in the program's annual plan.

## **AP-30 Methods of Distribution**

Activities to be undertaken by recipients of funds are subject to the specific applications received and program funding awards. For more detailed information on the types of eligible activities, as well as the method of distribution for each program, refer to the program documents on each Program's website.

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

|   |  |
|---|--|
| <b>State Program Name:</b>  | <b>Community Development Block Grant Program</b>   |
| <b>Funding Sources:</b>   | CDBG   |
| <b>Describe the state program addressed by the Method of Distribution.</b>  | <p>The South Carolina Community Development Block Grant (CDBG) Program is designed to provide assistance to units of general local government in improving economic opportunities and meeting community revitalization needs, particularly for persons of low and moderate income. The CDBG program has been funded through the State since 1982 by the U.S. Department of Housing and Urban Development (HUD) under the Housing and Community Development Act of 1974, as amended (Title I).</p> <p>The CDBG program is governed by Title I of the Housing and Community Development Act of 1974, as amended, and its implementing regulations for the State Program at 24 CFR Part 570, Subpart I. All CDBG activities must be carried out in accordance with the requirements of Title I, Subpart I, the State Consolidated Plan and this Program Description.</p> <p>The SC Department of Commerce, Division of Grants Administration, administers the annual allocation from HUD for the CDBG program.</p>  |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> | <p>For most Community Development Programs, the State scores applications against other applications submitted for the same program, using the following criteria: level of community distress, severity of the problem to be addressed using grant funds awarded, citizen participation, level of effort or return on CDBG investment, feasibility of the project, readiness of the project to proceed if funds are awarded, CDBG cost/benefit ratio, number and LMI percentage of project beneficiaries, project outcomes to be achieved and impact, sustainability of the project, degree to which the project reflects state priorities, and capacity of the potential recipient to administer a CDBG project. Some criteria are scored independently based on scoring criteria outlined in the CDBG Program Description, and others are ranked and scored accordingly in logical increments.</p> <p>The Selection Criteria are rated and assigned a score from 1 to 3 where 3 = the best response, 2 = average, and 1 = less than satisfactory. Zero points may be awarded to a criterion if minimum program requirements are not addressed. The point assignment is multiplied by the weight of each criterion to obtain a score. There is a maximum score of 300 points.</p> <p>The State may utilize the expertise of other appropriate State agencies in making a determination regarding the above factors, and the State may request additional information from the applicant or other sources as necessary to evaluate the application and proposed project. The State reserves the right to negotiate or require</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

| State Program Name: | Community Development Block Grant Program   |
|---------------------|---|
|                     | <p>changes in activities or funding in order to achieve program objectives. For water and sewer projects, the State may require that rates be adjusted to appropriate levels to ensure adequate funding for operation and maintenance or to facilitate borrowing a portion of project costs if such rate increases are reasonable and appropriate.</p> <p>In the event of a tie where there are more applications under consideration for funding than there are funds available, preference will be given first to those applications addressing the highest state priorities and second, to those with the highest Outcome score. If there continues to be a tie the one that benefits the most LMI persons will be funded. The highest scoring projects determined to be fundable will be recommended to the Secretary of the SC Department of Commerce, or his designee, for funding based on the amount of funds available. Projects generally should score at least 175 points to be considered for funding but such projects are not guaranteed funding. The Secretary, or his designee, will make final funding determinations based on a review of the projects utilizing the selection criteria and that best meet Department objectives.</p> <p>The State may make commitments for funding from future rounds, or any additional allocations, reallocations, recaptured or remaining funds, to projects from this program year which are determined by the Secretary, or his designee, to meet Department objectives. The State may also make a commitment to a project and/or partially fund a project (i.e., for ERR, acquisition, engineering) that scores sufficiently but is not ready due to design, environmental or funding issues. Funding may come from this program year, reallocated or recaptured funds, or be contingent on future years' funding.</p> <p><u>Community Development Ready to Go Program</u></p> <p>For the Ready to Go Program, all required project activities leading up to bidding must be complete prior to submission of an application including but not limited to: project design, environmental review, acquisition and permits. Applications are considered for award once all application documentation has been received, and projects are reviewed using the non comparative scoring factors listed above for the competitive Community Development Programs. The project must obtain a minimum score of 150 points to be considered eligible for funding. In the event there are more eligible applications submitted during the same time than funds available, the highest scoring eligible projects will be funded.</p> <p><u>Business Development Program</u></p> <p>Applications for Business Development grants may be requested at any time, and Grants Administration may issue commitments at any time for project funding contingent upon receipt of an acceptable written commitment from the business (if job</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

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|--|--|
| <b>State Program Name:</b>   | <b>Community Development Block Grant Program</b>   |
|  | creation or retention is involved), acceptable application information, compliance with CDBG program guidelines and HUD regulations, and availability of program funding. Applications are considered for award once all application documentation has been received and are reviewed for completeness and compliance with Program requirements and applicable HUD regulations. The following factors are also considered in making a funding decision: Market conditions or need for the project, economic impact, leveraging, and viability and level of public risk.  |
| <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG Only)</b> | <p>Each year, the SC Department of Commerce Grants Administration Division updates its annual plan or CDBG Program Description and applicant guidance documents and posts them on the <a href="https://www.cdbgSC.com">https://www.cdbgSC.com</a> website. These include the CDBG Program Description, CDBG Application Guidelines and CDBG Implementation Manual, as well as other information helpful to potential applicants. Application request forms can also be found on the website.</p> <p>Note that both the CDBG Program Description and Application Guidelines define and describe all scoring criteria and provide a more in-depth discussion of application requirements and how each type of CDBG application will be reviewed.</p>     |
| <b>Describe how resources will be allocated among funding categories.</b>  | <p>The State's 2019 CDBG allocation is \$20,128,358. The State plans the following distribution:</p> <ul style="list-style-type: none"> <li>• Community Infrastructure - \$12,212,771</li> <li>• Community Enrichment - \$3,000,000</li> <li>• Neighborhood Revitalization - \$811,737</li> <li>• Special Projects - \$300,000</li> <li>• Ready to Go - \$600,000</li> <li>• Business Development - \$2,000,000</li> <li>• Regional Planning - \$500,000</li> <li>• State Administration - \$201,283</li> <li>• State Technical Assistance - \$502,567</li> </ul> <p>Note that for AP-20 Goals funding and AP-25 Allocation Priorities percentage calculations, Special Projects and Ready to Go have been included with Community Infrastructure.</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

|  |   |
|--|---|
| <b>State Program Name:</b>                               | <b>Community Development Block Grant Program</b>  |
|  | Also note that the amount for State Administration is equal to the allowable amount, or 2% of the annual allocation plus \$100,000, and all but the additional \$100,000 will be matched by state funds. The amount for Technical Assistance is also equal to the allowable amount, or 1% of the annual allocation.   |
| <b>Describe threshold factors and grant size limits.</b> | <p><b><u>Grant Maximums:</u></b></p> <p>CDBG grant maximums and minimums have been established for each Program:</p> <ul style="list-style-type: none"> <li>• Community Infrastructure - \$750,000* maximum, \$50,000 minimum</li> <li>• Community Enrichment, Neighborhood Revitalization &amp; Ready to Go - \$500,000 maximum, \$50,000 minimum</li> <li>• Special Projects - \$150,000 maximum and \$50,000 minimum</li> <li>• Economic Development - \$10,000 per job maximum and \$50,000 minimum</li> <li>• Regional Planning - \$50,000</li> </ul> <p>* Waivers of the grant maximum up to \$1,000,000 will be considered based on whether the project addresses an urgent and compelling need or proposes a regional solution or system-wide improvements (i.e., treatment plant), as well as the extent of leveraging and a reasonable CDBG cost of \$10,000 per household or less. A written request explaining the rationale for a waiver of the grant maximum must be submitted for consideration along with the application.</p> <p>The grant award limits for all categories may be waived at the discretion of Grants Administration in order to provide the level of assistance required where other resources are not reasonably available to the unit of local government to address the need in a timely manner or where Grants Administration determines the amount is necessary and appropriate to achieve the State's CDBG Program objectives.</p> <p><b><u>Threshold</u></b></p> <p>As a performance-based incentive, a unit of local government can apply for an additional Community Development grant if it has no more than two open CDBG grants (excluding Business Development or Regional Planning grants). However, the open grants must not have exceeded a 30 month grant period.</p> <p>There are additional program category threshold limits that apply:</p> <ul style="list-style-type: none"> <li>• No more than one Neighborhood Revitalization or streetscape project.</li> <li>• No more than one Ready to Go project.</li> </ul> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

| State Program Name:   | Community Development Block Grant Program  |
|---|--|
|   | <ul style="list-style-type: none"><li>No more than one project for the same general target area/neighborhood open at the same time, unless the current project is under construction.</li></ul> <p>For threshold purposes, a grant is considered open if it is not programmatically closed at the time of application submission. The applicant must submit a request for waiver prior to or with the application request. At the discretion of Grants Administration, a performance threshold waiver may be considered only for the following reasons:</p> <ul style="list-style-type: none"><li>There is an urgent or compelling need for immediate assistance, such as an imminent health threat to the public, or</li><li>It is determined that lack of performance on an open grant is due to unavoidable circumstances or conditions beyond the control of the local government. If problems are determined to be administrative, the local government may be allowed to apply if a different grant administrator is responsible for the new application/project.</li></ul> <p>A unit of local government may not apply for Community Development funds if it has any open grant which has not been programmatically closed due to the local government's lack of compliance with significant programmatic or financial requirements of the program. A grant may not be awarded to a local government which has a serious, outstanding audit or monitoring finding involving the potential for significant monetary restitution or non-responsiveness on any previously funded CDBG grant.</p> |
| What are the outcome measures expected as a result of the method of distribution? | All projects are required to propose a level of benefit and performance outcomes they expect the project will achieve as a result of the use of CDBG funds. Projects are evaluated on this basis, along with all other scoring criteria, and projects must demonstrate that they have achieved performance goals once all project funds have been expended, as part of the grant closeout process. Accomplishments are reported annually in the State's Consolidated Performance and Evaluation Report, or CAPER.  |

#### Questions not applicable to CDBG, and thus without responses in the CDBG Method of Distribution section:

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

## **AP-30 Methods of Distribution**

Table 4 - Distribution Methods by State Program- CDBG

**State Program Name: Community Development Block Grant**

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

|   |  |
|---|--|
| <b>State Program Name:</b>  | <b>HOME Investment Partnerships Program</b>  |
| <b>Funding Sources:</b>   | HOME   |
| <b>Describe the state program addressed by the Method of Distribution.</b>  | HOME funding will be made available through a competitive process by which the highest scoring applications submitted during an annual funding cycle will be awarded. South Carolina will not distribute HOME Investment Partnerships Program funds through subgrantees.   |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> | <p><b>1. Experience</b> - Points are awarded based on the Applicant's demonstration of experience and success in developing, managing and operating rental housing projects similar to the one(s) proposed. Applicants must appropriately complete the Experience Certification (Form M-34) to claim points.</p> <p>a. Previous development experience of Rental properties using at least one (1) governmental funding source: Owners (which include individual(s), corporation(s), nonprofit(s), for-profit(s), Public Housing Authorities or units of local government) will receive points for the previous development of successful rental projects utilizing at least one governmental funding source. Previous development experience must be obtained through the successful completion of affordable housing utilizing CDBG, HOME, NHTF, SC HTF, FHLB, LIHTC, NSP Rental, etc. Experience gained as an owner of another entity may be included but not as an employee of another entity. Experience in successful rental projects means coordinating the development team from the planning, financing and construction of a project through receipt of Certificates of Occupancy (COs) and reaching stabilized occupancy. Applicant must have a current ownership interest in the project.</p> <ul style="list-style-type: none"> <li>• One point per successfully completed rental project (5 project maximum). <b>Up to 5 Points</b></li> </ul> <p>b. Previous development experience of rental properties: Owners (which include individual(s), corporation(s), nonprofit(s), for-profit(s), Public Housing Authorities or units of local government) will receive points for the previous development of successful rental projects. An Applicant may demonstrate the ability to implement rental housing projects by providing documentation as to the development of similar projects utilizing private funding or other non-governmental funding. Experience gained as an owner of another entity may be included but not as an employee of another entity. Experience in successful rental projects means coordinating the development team from the planning, financing and construction of a project through receipt of Certificates of Occupancy (COs) and reaching stabilized occupancy. Applicant must have a current ownership interest in the project.</p> <ul style="list-style-type: none"> <li>• One point per successfully completed project (2 project maximum). <b>Up to 2 Points</b></li> </ul> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

| State Program Name: | HOME Investment Partnerships Program   |
|---------------------|--|
|                     | <p><b>2. Performance Issues - Authority Programs</b></p> <p>Applicant was suspended or debarred. <b>-5 Points</b></p> <p>Awarded funds were de-obligated or rescinded by the Authority for lack of progress or an inability to complete the project. <b>-2 Points</b></p> <p>Negative points will not be assessed for de-obligated/rescinded funds when issues regarding a project progressing were beyond an awardee's control as determined by the Authority.</p> <p><b>3. Site and Neighborhood Characteristics</b></p> <p>Points will be awarded for services located within the mile ranges specified in the Services table below, as indicated by public paved road, existing at the time the application is submitted, and accessible to the public for motor vehicular use. Distances should be measured using a computer based mapping system such as Google Maps or other similar distance calculating systems. Distances to positive characteristics will be measured using lawful driving practices from the site entrance(s) to the positive site service (i.e. no turning through double yellow lines, no crossing grass medians, no driving the wrong way on one way streets, etc.). Longitude and latitude coordinates are required for the site entrance(s) as well as for all corners of the site. All coordinates should be marked with survey tape, survey flags, etc. Submitted area site plan must have ¼ mile, ½ mile and 1 mile radius circles shown from center of proposed site. Color photographs of all services must be included with the application. Duplicate copies of the application must also contain color photographs. The name of the service must be visible in the photograph. Applicants may include a maximum of one (1) positive site service of each service type for scoring purposes. All positive site services must be listed on <b>Exhibit 7 - Site Distances</b>. All directions must be printed from the mapping system and included in the application for points to be awarded. <b>Directions that do not lead to the service, as stated in the directions provided with the Application, will not be awarded points.</b> Distances are subject to Authority verification and are GPS measured and odometer* confirmed by third party site analyst from center of entrance into site to center of entrance into service location. Distances for scattered sites will be determined as outlined in the definition for scattered sites. All positive site services must be open to the general public and operational at the time the Authority's site visit is made or points will not be awarded.</p> <p><small><b>*Odometer Calculations:</b> the distances to positive services are driven and the odometer mileages and electronic tracking data systems used to determine mileage calculations. Distances are measured to one decimal point and are not rounded up or down. Distance less than a ½ mile is measured by using electronic tracking data systems.</small></p> |

The table below shows the point structure for Positive Site Characteristics:

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

| Service  | ½ mile | 1 mile | 1 ½ mile | 2 miles | 2 ½ miles | 3 miles |
|--|--------|--------|----------|---------|-----------|---------|
| Full Service Grocery Store: the store must operate with regular business hours offering a full range and variety of foods, cleaning products and paper products. To qualify as offering a full range and variety of foods, the store must offer sufficient quantities of items from each of the following four categories of staple foods on a continuous basis: 1) meats, poultry and fish; 2) breads and cereals; 3) vegetables and fruits; and 4) dairy products. | 4      | 3.5    | 3        | 2.5     | 2         | 1.5     |
| Pharmacy or Drug Store: does not include specialty pharmacies or drug stores; or pharmacies or drug stores only available for patients of a designated medical practice or facility.   | 4      | 3.5    | 3        | 2.5     | 2         | 1.5     |
| Convenience Store and Gas Station: walk-up “window only service” stores and free standing kiosks do not count as convenience stores.   | 4      | 3.5    | 3        | 2.5     | 2         | 1.5     |
| Public Park or Playground: all to be owned and maintained by a local government or non-profit entity and containing at a minimum, commercial playground equipment and/or walking/bike trails (Playgrounds at churches, schools or in other neighborhoods do not count) or Recreation Center or Senior Activity Center (with scheduled activities offered at least 5 days a week and operated by a local government or nonprofit entity; private gyms will not count) | 3      | 2.5    | 2        | 1.5     | 1         | 0.5     |

|  |  |
|--|--|
| <b>State Program Name:</b>   | <b>HOME Investment Partnerships Program</b>  |
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> <p><b>(continued)</b></p> | <p><b>Applicants will receive negative points for the following detrimental site characteristics:</b></p> <p>For the detrimental characteristics below, the Authority defines its determination of distance as the shortest distance, in a straight line, from the closest site boundary line of the proposed site to the closest site boundary line of the detrimental site characteristic to determine whether negative points will be assessed.</p> <p>When a detrimental site characteristic is located on a parcel shared by multiple businesses, the distance between the detrimental site characteristic and the proposed site is measured, in a straight line, from the closest site boundary line of the proposed site to the closest boundary line of the parcel on which the detrimental site characteristic is located. Detrimental site characteristics are determined as of the time of the site visit.</p> <ol style="list-style-type: none"> <li>1. Sites within one-half (1/2) mile of an operating commercial beef/hog/chicken/turkey farm or processing plant. As part of the application submission, Applicants are required to identify and provide name(s) and location(s) of any such facility within one-half (1/2) mile of where the development is proposed.</li> </ol> <p><b>-1 Point</b></p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

| State Program Name: | HOME Investment Partnerships Program  |
|---------------------|---|
|                     | <p>2. Sites within one-quarter (1/4) mile of adult video/entertainment venue/club. <b>-1 Point</b></p> <p>3. Sites within one-quarter (1/4) mile of a sewage treatment plant. <b>-1 Point</b></p> <p><b>4. Project Readiness</b></p> <p>A letter from the City/County official or utility provider, documenting water and sewer utility tie-ins are accessible and within:</p> <ul style="list-style-type: none"> <li>• 350 feet of the proposed site; <b>2 Points</b> OR</li> <li>• 351 to 500 feet of the proposed site. <b>1 Point</b></li> </ul> <p>The proposed project is located within a current identified master plan, revitalization plan, or empowerment zone. <b>2 Points</b></p> <p><b>5. Targeting –</b></p> <p>1) Applicant will be awarded points for designating, at a minimum, ten percent (10%) of the total units for disabled, homeless, or special needs tenants. A letter from the appropriate disability agency regarding the need for the units must be submitted with the application. <b>2 Points</b></p> <p>2) Underserved counties within SC will receive a preference as follows:</p> <ul style="list-style-type: none"> <li>• <b>8 Points</b> - Allendale, Bamberg, Beaufort, Berkeley, Calhoun, Chester, Chesterfield, Clarendon, Colleton, Dorchester, Edgefield, Fairfield, Georgetown, Hampton, Jasper, Kershaw, Lancaster, Lee, Lexington, Marlboro, McCormick, Newberry, Oconee, Saluda, Sumter, Union, Williamsburg</li> <li>• <b>4 Points</b> - Abbeville, Barnwell, Charleston, Marion, Orangeburg, Pickens, York</li> <li>• <b>2 Points</b> - Aiken, Anderson, Cherokee, Darlington, Dillon, Florence, Greenville, Greenwood, Horry, Laurens, Richland, Spartanburg</li> </ul> <p><b>6. Development Design Criteria</b> - All projects awarded funds must incorporate into the project all of the items chosen for points. As part of the placed in service application submission, the Authority will conduct an inspection to ensure that items for which points were taken exist in the project and will require manufacturer's data sheets to be submitted, as necessary, as confirmation that items chosen meet the standards as outlined.</p> <ol style="list-style-type: none"> <li>1. Limited lifetime 30-year Architectural shingles with 30 lbs. class synthetic felt. <b>8 Points</b></li> <li>2. Insulated attic and/or ceiling R-38, walls R-15, and crawl space and/or floors R-25. <b>3 Points</b></li> <li>3. Energy Star rated HVAC systems (15 SEER or greater) in all units. <b>5 Points</b></li> <li>4. Underground utilities (gas/electric, cable and phone) throughout the project site. <b>2 Points</b></li> <li>5. Energy Star ceiling fan with light fixture in the living room and all bedrooms. Ceiling fans and light fixtures must connect to separate wall switches. <b>5 Points</b></li> </ol> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

|  |   |
|--|---|
| State Program Name:  | <b>HOME Investment Partnerships Program</b>   |
|  | <p>6. Full size Energy Star refrigerator, with ice maker, having a minimum size of eighteen (18) cubic feet. <b>5 Points</b></p> <p>7. Energy Star rated dishwasher in all units. <b>3 Points</b></p> <p>8. Over the range mounted microwave oven, with vented fan, in all units. <b>4 Points</b></p> <p>9. All units must have a Range Queen, Fire Stop, Auto Stop or comparable extinguishing system over the stove. <b>1 Point</b></p> <p>10. Provide an easily-accessible area that serves the entire project and is dedicated to the collection and storage of non-hazardous material for recycling, to include paper, corrugated cardboard, glass, plastics, and metals. Property management is responsible for ensuring proper disposal and removal of the recyclables. For scattered site projects, provide a letter from the City/County stating that individual recycle bins will be provided to each house, duplex, or townhouse. <b>1 Point</b></p> <p>11. Landscaping - Projects using native drought resistance plantings, preserving and protecting existing trees during construction. An <b>Architect certified landscape plan</b> should be submitted listing the new plantings and marking the existing trees that indicates (1) the location of all existing plantings and the proposed location of all new planting areas; and (2) a list of all plants to be added, to include both the common and botanical name of the plants. <b>2 Points</b></p> <p>12. Water Conservation – All units to include toilets with 1.28 GPF, shower heads at 1.5 GPM, and bath and kitchen faucets at 1.5 GPM, or less. <b>2 Points</b></p> <p>13. All exterior door units to be fiberglass with rot proof jambs. <b>5 Points</b></p> |
| Describe how resources will be allocated among funding categories. | <p>The Authority's 2019 HUD funding level is \$6,527,338 from the 2019 HOME allocation, plus \$2,040,000 in accrued program income and \$1,900,000 in funds recaptured as a result of deobligating or rescinding funds from prior year allocations. The total of \$10,467,338 will be allocated in funding categories as follows:</p> <ul style="list-style-type: none"> <li>• Allowable set aside of ten percent (10%) for the administration of the program. Administrative funds of \$652,733 will be used for the planning, administration, allocation of indirect costs and monitoring of the program. Funds will also be used to conduct workshops to assist participants in applying for and implementing HOME funded projects.</li> <li>• The required CHDO set-aside allocation is fifteen percent (15%) or \$979,100 of the Authority's 2019 HOME allocation. CHDOs wanting to receive funds must comply with the established procedures contained in the 2019 Small Rental Development Program Manual for funding. This amount is included in the total amount of the set-aside for the rental competition.</li> <li>• Set aside of \$9,414,605 for the Small Rental Development Program, to be used in conjunction with the Low Income Housing Tax Credit (LIHTC) Program, National</li> </ul>  |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

|  |  |
|--|--|
| <b>State Program Name:</b>                               | <b>HOME Investment Partnerships Program</b>  |
|  | <p>Housing Trust Fund Program and the SC Housing Trust Fund, to finance rental development projects.</p> <ul style="list-style-type: none"> <li>• Set aside of \$300,000 to be used in a partnership with the SC Dept of Mental Health to fund a TBRA program.</li> <li>• Set aside of \$100,000 to be used for other rental assistance.</li> </ul>  |
| <b>Describe threshold factors and grant size limits.</b> | <p>Participating Jurisdictions (PJs) are not eligible to apply for Authority HOME funds.</p> <p>Financial Criteria: Each Applicant must meet a minimum financial capacity standard based on the total number of rental units to be developed. Such financial capacity must be evidenced by audited financial statements.</p> <p>Applicants must be in good standing with all Authority and SC Housing Corporation administered programs.</p> <p>Applicants who currently have HOME Program Income or CHDO Program Proceeds are not eligible to apply.</p> <p>Previous HOME awardees must have met the following deadlines:</p> <ul style="list-style-type: none"> <li>• All 2015 and prior projects officially closed out (see “project completion” definition) on or before February 1, 2019.</li> <li>• All 2016 projects must have 75% construction completed or 75% HOME funds drawn down by February 1, 2019 as evidenced by a completed Authority Inspection.</li> <li>• 2017 HOME awards must have 50% of construction completed or 50% HOME funds drawn down by February 1, 2019 as evidenced by a completed Authority Inspection.</li> </ul> <p>No County, in any given year, can receive more than 20% of the current year’s available HOME Rental funds.</p> <p>Applicants that are related entities, principals, and/or individuals and are applying for HOME funds are only eligible to apply for two (2) SRDP awards and may only be allocated one (1) SRDP award.</p> <p>All HOME Applicants must have a designated Program Administrator on staff that will be responsible for the coordination of the project.</p> <p>A Phase I ESA report must be submitted at initial application.</p> <p>A Market Study Needs Assessment Report prepared by an Authority approved third party market study provider must be submitted with the application to ensure there is adequate demand for a proposed project.</p> <p>The Authority requires appraisals at Application submission for all development proposals.</p> <p>Applicants must have site control of their proposed project site.</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

|  |  |
|--|--|
| <b>State Program Name:</b>   | <b>HOME Investment Partnerships Program</b>  |
|  | <p>The Applicant must provide proof of and have in place at the time of application submission proper zoning for the proposed project site.</p> <p>The total maximum 2019 HOME award amount per application will be determined by an SC Housing underwriting analysis.</p>   |
| <b>What are the outcome measures expected as a result of the method of distribution?</b> | <p>All projects are subject to HOME/NHTF/SC HTF compliance monitoring requirements. At a minimum, the owners of projects are responsible for conducting the following annually:</p> <ul style="list-style-type: none"> <li>• Maximum rent and utility allowances must be reviewed and recalculated annually upon the anniversary of the lease renewal date. Updated HOME/NHTF rents are published annually by HUD and are provided on the Authority's website. Updated SC HTF rent allowances are updated annually by SC Housing.</li> <li>• The HOME Final Rule and the NHTF Interim Rule requires approval of all rents on an annual basis for developments with such units. The approval process will be handled by the Compliance Monitoring Department. Annual Rent Approval Form M-66 will be submitted to Compliance Monitoring staff to begin the approval process.</li> <li>• HUD Utility Schedule Model. All utility allowance calculations on the Excel Spreadsheets as part of the HUD Utility Schedule Model must be provided. The Authority reserves the right to review all backup data used for calculations. HUD link: <a href="http://www.huduser.org/portal/resources/utlmodel.html">http://www.huduser.org/portal/resources/utlmodel.html</a>.</li> <li>• The annual income for all tenants must be reviewed and verified each year. Updated HOME/NHTF incomes are published annually by HUD and are provided on the Authority's website. Updated SC HTF income limits are updated annually by SC Housing and also provided on the website. The annual income definition found at 24 CFR Part 5: income is the gross amount of income of all adult household members that is anticipated to be received during the coming 12 month period.</li> <li>• On-site inspections for compliance with the Uniform Physical Conditions Standards (UPCS) should be conducted by the owners: <ul style="list-style-type: none"> <li>○ The Authority conducts periodic on-site compliance reviews throughout the affordability period to ensure compliance with HOME/NHTF/SC HTF rental program requirements. These reviews include, but are not limited to, occupancy requirements and property standards. Refer to the SRDP Compliance Manual located on the Authority's website for further compliance monitoring requirements.</li> <li>○ Rental projects with 10 or more HOME units will be required to submit financial statements annually to determine the financial health of the project. Specifics will be determined upon release of guidance from HUD.</li> </ul> </li> </ul> |

## **AP-30 Methods of Distribution**

Table 4 - Distribution Methods by State Program- HOME

**Questions not applicable to HOME, and thus without responses in the HOME Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

|   |   |
|---|---|
| <b>State Program Name:</b>  | <b>National Housing Trust Fund</b>  |
| <b>Funding Sources:</b>   | Housing Trust Fund  |
| <b>Describe the state program addressed by the Method of Distribution.</b>  | South Carolina will not distribute National Housing Trust Funds through subgrantees. NHTF funding will be made available through a competitive process by which the highest scoring applications submitted during an annual funding cycle will be awarded.  |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> | <p><b>1. Experience</b></p> <p>Points are awarded based on the Applicant's demonstration of experience and success in developing, managing, and operating affordable rental housing projects similar to the project(s) proposed. Applicants must appropriately complete the Experience Certification (Form M-34) to claim points.</p> <p>1) Previous development experience of Rental properties using at least one (1) governmental funding source: Owners (which include individual(s), corporation(s), nonprofit(s), for-profit(s), Public Housing Authorities or units of local government) will receive points for the previous development of successful rental projects utilizing at least one governmental funding source. Previous development experience must be obtained through the successful completion of affordable housing utilizing CDBG, HOME, NHTF, SC HTF, FHLB, LIHTC, NSP Rental, etc. Experience gained as an owner of another entity may be included but not as an employee of another entity. Experience in successful rental projects means coordinating the development team from the planning, financing and construction of a project through receipt of Certificates of Occupancy (COs) and reaching stabilized occupancy. Applicant must have a current ownership interest in the project.</p> <ul style="list-style-type: none"> <li>• One point per successfully completed rental project (5 project maximum). <b>Up to 5 Points</b></li> </ul> <p>2. Previous development experience of rental properties: Owners (which include individual(s), corporation(s), nonprofit(s), for-profit(s), Public Housing Authorities or units of local government) will receive points for the previous development of successful rental projects. An Applicant may demonstrate the ability to implement rental housing projects by providing documentation as to the development of similar projects utilizing private funding or other non-governmental funding. Experience gained as an owner of another entity may be included but not as an employee of another entity. Experience in successful rental projects means coordinating the development team from the planning, financing and construction of a project through receipt of Certificates of Occupancy (COs) and reaching stabilized occupancy. Applicant must have a current ownership interest in the project.</p> <ul style="list-style-type: none"> <li>• One point per successfully completed project (2 project maximum). <b>Up to 2 Points</b></li> </ul> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

| State Program Name: | National Housing Trust Fund  |
|---------------------|--|
|                     | <p><b>2. Performance Issues - Authority Programs</b></p> <p>Applicant was suspended or debarred for any length of time. - <b>5 Points</b></p> <p>Awarded funds were de-obligated or rescinded by the Authority for lack of progress or an inability to complete the project. -<b>2 Points</b></p> <p>Negative points will not be assessed for de-obligated/rescinded funds when issues regarding a project progressing were beyond an awardee's control as determined by the Authority.</p> <p><b>3. Site and Neighborhood Characteristics</b></p> <p>Points will be awarded for services located within the mile ranges specified in the Services table below, as indicated by public paved road, existing at the time the application is submitted, and accessible to the public for motor vehicular use. Distances should be measured using a computer based mapping system such as Google Maps or other similar distance calculating systems. Distances to positive characteristics will be measured using lawful driving practices from the site entrance(s) to the positive site service (i.e. no turning through double yellow lines, no crossing grass medians, no driving the wrong way on one way streets, etc.). Longitude and latitude coordinates are required for the site entrance(s) as well as for all corners of the site. All coordinates should be marked with survey tape, survey flags, etc. Submitted area site plan must have ¼ mile, ½ mile and 1 mile radius circles shown from center of proposed site. Color photographs of all services must be included with the application. Duplicate copies of the application must also contain color photographs. The name of the service must be visible in the photograph. Applicants may include a maximum of one (1) positive site service of each service type for scoring purposes. All positive site services must be listed on <b>Exhibit 7 - Site Distances</b>. All directions must be printed from the mapping system and included in the application for points to be awarded. <b>Directions that do not lead to the service, as stated in the directions provided with the Application, will not be awarded points.</b> Distances are subject to Authority verification and are GPS measured and odometer* confirmed by third party site analyst from center of entrance into site to center of entrance into service location. Distances for scattered sites will be determined as outlined in the definition for scattered sites. All positive site services must be open to the general public and operational at the time the Authority's site visit is made or points will not be awarded.</p> <p><small>*<b>Odometer Calculations:</b> the distances to positive services are driven and the odometer mileages and electronic tracking data systems used to determine mileage calculations. Distances are measured to one decimal point and are not rounded up or down. Distance less than a ½ mile is measured by using electronic tracking data systems.</small></p> |

The table below shows the point structure for Positive Site Characteristics.

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

| Service  | $\frac{1}{2}$ mile | 1 mile | 1 $\frac{1}{2}$ mile | 2 miles | 2 $\frac{1}{2}$ miles | 3 miles |
|--|--------------------|--------|----------------------|---------|-----------------------|---------|
| Full Service Grocery Store: the store must operate with regular business hours offering a full range and variety of foods, cleaning products and paper products. To qualify as offering a full range and variety of foods, the store must offer sufficient quantities of items from each of the following four categories of staple foods on a continuous basis: 1) meats, poultry and fish; 2) breads and cereals; 3) vegetables and fruits; and 4) dairy products. | 4                  | 3.5    | 3                    | 2.5     | 2                     | 1.5     |
| Pharmacy or Drug Store: does not include specialty pharmacies or drug stores; or pharmacies or drug stores only available for patients of a designated medical practice or facility.   | 4                  | 3.5    | 3                    | 2.5     | 2                     | 1.5     |
| Convenience Store and Gas Station: walk-up "window only service" stores and free standing kiosks do not count as convenience stores.   | 4                  | 3.5    | 3                    | 2.5     | 2                     | 1.5     |
| Public Park or Playground: all to be owned and maintained by a local government or non-profit entity and containing at a minimum, commercial playground equipment and/or walking/bike trails (Playgrounds at churches, schools or in other neighborhoods do not count) or Recreation Center or Senior Activity Center (with scheduled activities offered at least 5 days a week and operated by a local government or nonprofit entity; private gyms will not count) | 3                  | 2.5    | 2                    | 1.5     | 1                     | 0.5     |

|  |   |
|--|---|
|  | <p><b>Applicants will receive negative points for the following detrimental site characteristics:</b></p> <p>For the detrimental characteristics below, the Authority defines its determination of distance as the shortest distance, in a straight line, from the closest site boundary line of the proposed site to the closest site boundary line of the detrimental site characteristic to determine whether negative points will be assessed. When a detrimental site characteristic is located on a parcel shared by multiple businesses, the distance between the detrimental site characteristic and the proposed site is measured, in a straight line, from the closest site boundary line of the proposed site to the closest boundary line of the parcel on which the detrimental site characteristic is located. Detrimental site characteristics are determined as of the time of the site visit.</p> <ol style="list-style-type: none"> <li>1. Sites within one-half (1/2) mile of an operating commercial beef/hog/chicken/turkey farm or processing plant. As part of the application submission, Applicants are required to identify and provide name(s) and location(s) of any such facility within one-half (1/2) mile of where the development is proposed. -1 Point</li> </ol> |
|--|---|

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

| State Program Name: | National Housing Trust Fund   |
|---------------------|---|
|                     | <p>2. Sites within one-quarter (1/4) mile of adult video/entertainment venue/club. -1 Point</p> <p>3. Sites within one-quarter (1/4) mile of a sewage treatment plant. -1 Point</p> <p><b>4. Project Readiness</b></p> <p>A letter from the City/County official or utility provider, documenting water and sewer utility tie-ins are accessible and within:</p> <ul style="list-style-type: none"> <li>• 350 feet of the proposed site; <b>2 Points</b> OR</li> <li>• 351 to 500 feet of the proposed site. <b>1 Point</b></li> </ul> <p>The proposed project is located within a current identified master plan, revitalization plan, or empowerment zone. <b>2 Points</b></p> <p><b>5. Targeting</b></p> <p>1) Applicant will be awarded points for designating, at a minimum, ten percent (10%) of the total units for disabled, homeless, or special needs tenants. A letter from the appropriate disability agency regarding the need for the units must be submitted with the application. <b>2 Points.</b></p> <p>2) Underserved counties within SC will receive a preference as follows:</p> <ul style="list-style-type: none"> <li>• <b>8 Points</b> - Allendale, Bamberg, Beaufort, Berkeley, Calhoun, Chester, Chesterfield, Clarendon, Colleton, Dorchester, Edgefield, Fairfield, Georgetown, Hampton, Jasper, Kershaw, Lancaster, Lee, Lexington, Marlboro, McCormick, Newberry, Oconee, Saluda, Sumter, Union, Williamsburg</li> <li>• <b>4 Points</b> - Abbeville, Barnwell, Charleston, Marion, Orangeburg, Pickens, York</li> <li>• <b>2 Points</b> - Aiken, Anderson, Cherokee, Darlington, Dillon, Florence, Greenville, Greenwood, Horry, Laurens, Richland, Spartanburg</li> </ul> <p><b>6. Development Design Criteria</b></p> <p><b>All</b> projects awarded HOME funds must incorporate into the project all of the items chosen for points. As part of the placed in service application submission, the Authority will conduct an inspection to ensure that items for which points were taken exist in the project and will require manufacturer's data sheets to be submitted, as necessary, as confirmation that items chosen meet the standards as outlined.</p> <p>1) Limited lifetime 30-year Architectural shingles with 30 lbs. class synthetic felt. <b>8 Points</b></p> <p>2) Insulated attic and/or ceiling R-38, walls R-15, and crawl space and/or floors R-25. <b>3 Points</b></p> <p>3) Energy Star rated HVAC systems (15 SEER or greater) in all units. <b>5 Points</b></p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

| State Program Name:  | National Housing Trust Fund  |
|--|--|
|  | <p>4) Underground utilities (gas/electric, cable and phone) throughout the project site. <b>2 Points</b></p> <p>5) Energy Star ceiling fan with light fixture in the living room and all bedrooms. Ceiling fans and light fixtures must connect to separate wall switches. <b>5 Points</b></p> <p>6) Full size Energy Star refrigerator, with ice maker, having a minimum size of eighteen (18) cubic feet. <b>5 Points</b></p> <p>7) Energy Star rated dishwasher in all units. <b>3 Points</b></p> <p>8) Over the range mounted microwave oven, with vented fan, in all units. <b>4 Points</b></p> <p>9) All units must have a Range Queen, Fire Stop, Auto Stop or comparable extinguishing system over the stove. <b>1 Point</b></p> <p>10) Provide an easily-accessible area that serves the entire project and is dedicated to the collection and storage of non-hazardous material for recycling, to include paper, corrugated cardboard, glass, plastics, and metals. Property management is responsible for ensuring proper disposal and removal of the recyclables. For scattered site projects, provide a letter from the City/County stating that individual recycle bins will be provided to each house, duplex, or townhouse. <b>1 Point</b></p> <p>11) Landscaping - Projects using native drought resistance plantings, preserving and protecting existing trees during construction. An <b>Architect certified landscape plan</b> should be submitted listing the new plantings and marking the existing trees that indicates (1) the location of all existing plantings and the proposed location of all new planting areas; and (2) a list of all plants to be added, to include both the common and botanical name of the plants. <b>2 Points</b></p> <p>12) Water Conservation – All units to include toilets with 1.28 GPF, shower heads at 1.5 GPM, and bath and kitchen faucets at 1.5 GPM, or less. <b>2 Points</b></p> <p>13) All exterior door units to be fiberglass with rot proof jambs. <b>5 Points</b></p> |
| Describe how resources will be allocated among funding categories. | <p>The Authority will have a total of \$6,040,000 I NHTF funding available for distribution. This includes \$340,000 from the 2017 allocation, \$2,700,000 from the 2018 allocation, and the \$3,000,000 2019 allocation. NHTF will be used as outlined below:</p> <ul style="list-style-type: none"> <li>• Allowable set aside of ten percent (10%) for the administration of the program. Administrative funds will be used for the planning, administration, allocation of indirect costs and monitoring of the program. Funds will also be used to conduct workshops to assist participants in applying for and implementing NHTF funded projects.</li> <li>• All remaining, \$5,740,000 to be used in a statewide Rental competition. This set-aside is designed to address new construction rental housing projects.</li> </ul>  |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

|  |   |
|--|---|
| <b>State Program Name:</b>                               | <b>National Housing Trust Fund</b>  |
| <b>Describe threshold factors and grant size limits.</b> | <p>Participating Jurisdictions (PJs) are not eligible to apply for Authority National Housing Trust Funds funds.</p> <p>Financial Criteria: Each Applicant must meet a minimum financial capacity standard based on the total number of rental units to be developed. Such financial capacity must be evidenced by audited financial statements.</p> <p>Applicants must be in good standing with all Authority and SC Housing Corporation administered programs.</p> <p>Applicants who currently have HOME Program Income or CHDO Program Proceeds are not eligible to apply.</p> <p>Previous HOME awardees must have met the following deadlines:</p> <ol style="list-style-type: none"> <li>All 2015 and prior projects officially closed out (see “project completion” definition) on or before February 1, 2019.</li> <li>All 2016 projects must have 75% construction completed or 75% HOME funds drawn down by February 1, 2019 as evidenced by a completed Authority Inspection.</li> <li>2017 HOME awards must have 50% construction completed or 50% HOME funds drawn down by February 1, 2019 as evidenced by a completed Authority Inspection.</li> </ol> <p>No County, in any given year, can receive more than 20% of the current years available SRDP Rental funds.</p> <p>Applicants that are related entities, principals, and/or individuals and are applying for NHTF funds are only eligible to apply for two (2) SRDP awards and may only be allocated one (1) SRDP award.</p> <p>All NHTF Applicants must have a designated Program Administrator on staff that will be responsible for the coordination of the project.</p> <p>A Phase I ESA report must be submitted at initial application.</p> <p>A Market Study Needs Assessment Report prepared by an Authority approved third party market study provider must be submitted with the application to ensure there is adequate demand for a proposed project.</p> <p>The Authority requires appraisals at Application submission for all development proposals.</p> <p>Applicants must have site control of their proposed project site.</p> <p>The Applicant must provide proof of and have in place at the time of application submission proper zoning for the proposed project site.</p> <p>The total maximum 2019 NHTF award amount per application will be determined by an SC Housing underwriting analysis.</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- NHTF

|  |   |
|--|---|
| <b>State Program Name:</b>   | <b>National Housing Trust Fund</b>  |
| <b>What are the outcome measures expected as a result of the method of distribution?</b> | <p>All projects are subject to HOME/NHTF/SC HTF compliance monitoring requirements. At a minimum, the owners of projects are responsible for conducting the following annually:</p> <ul style="list-style-type: none"> <li>• Maximum rent and utility allowances must be reviewed and recalculated annually upon the anniversary of the lease renewal date. Updated HOME/NHTF rents are published annually by HUD and are provided on the Authority's website. Updated SC HTF rent allowances are updated annually by SC Housing.</li> <li>• The HOME Final Rule and the NHTF Interim Rule requires approval of all rents on an annual basis for developments with such units. The approval process will be handled by the Compliance Monitoring Department. Annual Rent Approval Form M-66 will be submitted to Compliance Monitoring staff to begin the approval process.</li> <li>• HUD Utility Schedule Model. All utility allowance calculations on the Excel Spreadsheets as part of the HUD Utility Schedule Model must be provided. The Authority reserves the right to review all backup data used for calculations. HUD link: <a href="http://www.huduser.org/portal/resources/utilmodel.html">http://www.huduser.org/portal/resources/utilmodel.html</a>.</li> <li>• The annual income for all tenants must be reviewed and verified each year. Updated HOME/NHTF incomes are published annually by HUD and are provided on the Authority's website. Updated SC HTF income limits are updated annually by SC Housing. and also provided on the website. The annual income definition found at 24 CFR Part 5: income is the gross amount of income of all adult household members that is anticipated to be received during the coming 12 month period.</li> <li>• On-site inspections for compliance with the Uniform Physical Conditions Standards (UPCS) should be conducted by the owners: <ul style="list-style-type: none"> <li>○ The Authority conducts periodic on-site compliance reviews throughout the affordability period to ensure compliance with HOME/NHTF/SC HTF rental program requirements. These reviews include, but are not limited to, occupancy requirements and property standards. Refer to the SRDP Compliance Manual located on the Authority's website for further compliance monitoring requirements.</li> <li>○ Rental projects with 10 or more HOME units will be required to submit financial statements annually to determine the financial health of the project. Specifics will be determined upon release of guidance from HUD.</li> </ul> </li> </ul> |

**Questions not applicable to NHTF, and thus without responses in the NHTF Method of Distribution section:**

## **AP-30 Methods of Distribution**

Table 4 - Distribution Methods by State Program- NHTF

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- ESG

|   |  |
|---|--|
| <b>State Program Name:</b>  | <b>Emergency Solutions Grant Program</b>   |
| <b>Funding Sources:</b>   | ESG  |
| <b>Describe the state program addressed by the Method of Distribution.</b>  | The Emergency Solutions Grant program provides funding to: engage homeless individuals and families living on the street, improve the number and quality of emergency shelters for homeless individuals and families and provide funding to help operate these shelters, provide essential services to shelter residents and outreach to unsheltered homeless, rapidly rehouse homeless individuals and families, and prevent families/individuals from becoming homeless.   |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>   | <p>The Emergency Solutions Grant Program can award a total of 230 total points to applicants, for a variety of criteria including prior performance, applicant capacity, financial capacity, the proposed project, and other factors. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>• Up to 80 points based on the applicant’s prior year performance</li> <li>• Up to 40 points based on applicant capacity</li> <li>• Up to 60 points based on financial capacity</li> <li>• Up to 40 points for the proposed project</li> <li>• Up to 10 points for other factors*</li> </ul> <p>* Other factors are unique to each project</p>   |
| <b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b> | <p>Although states can award ESG Program funding to various recipients types, including non-profits and local governments. the South Carolina ESG Program has opted to award funding only to non-profit organizations. All 501(c)3 non-profits registered in the state of South Carolina are eligible to apply.</p> <p>ESG holds an annual Request for Application Workshop to discuss the new year’s funding opportunities. Past recipients are invited to attend, along with new organizations that have expressed interest in the program throughout the year. The purpose of the Workshop is to introduce potential applications to the ESG Program, explain the basic rules and requirements of the Program, and provide information on how to apply and the deadline for doing so. After applications are received in April, a panel of three Program staff review all applications received and score them on a scale of 0 to 230. Since 2018, applications are also ranked against applications received from other organizations within the local Continuum of Care region, and then funding decisions are made by the Program Management (currently the Director of the Office of Economic Opportunity, which administers the ESG Program). This is a change over prior years, when applications received were ranked as a whole, rather than by region.</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- ESG

|  |  |
|--|--|
| <b>State Program Name:</b>   | <b>Emergency Solutions Grant Program</b>   |
| <b>Describe how resources will be allocated among funding categories.</b>                | <p>ESG will receive a 2019 allocation of \$2,455,323. No supplemental funding is expected from additional sources, such as Continuum 501. ESG plans percentage allocations, after program admin and HMIS, as follows: Shelter/Street Outreach 60%, Homeless Prevention/Rapid Rehousing 40%. Program admin is 7.5% of the total and HMIS is 10%. Actual percentages may differ once all applications are received and scored, but shelter will not exceed 60%.</p> <p>Using these percentages, the 2019 funding will be distributed this way:</p> <ul style="list-style-type: none"> <li>• Shelter, Services &amp; Outreach - \$1,215,385</li> <li>• Homeless Prevention and Rapid Re-housing - \$810,256 (Homeless prevention - \$303,461, Re-housing - \$506,795)</li> <li>• HMIS - \$245,532</li> <li>• State Program Admin (7.5% of the total allocation) - \$184,149</li> </ul> <p><b>NOTE:</b> To determine activity funding, 7.5% program admin and 10% HMIS are subtracted from the total allocation. Then the percentages for activities are applied to the amount remaining. Actual amounts and percentages will not be known until applications have been received and funding decisions have been made.</p> |
| <b>Describe threshold factors and grant size limits.</b>                                 | <p>There are no threshold factors for the Emergency Solutions Grant Program.</p> <p>The maximum award amount is \$350,000, but in recent years, funding limitations have prevented the Program from issuing maximum awards. Instead, ESG strives to fund as many recipients as possible and to distribute funding throughout the state.</p>  |
| <b>What are the outcome measures expected as a result of the method of distribution?</b> | <p>Applicants for ESG funds identify measures of success and expected outcomes in their application. These must help achieve one or more ESG objectives, including street outreach to unsheltered homeless individuals and families, providing emergency shelter or essential services for individuals and families who have become homeless, rapidly rehousing individuals and families to shorten their episode of homelessness, and preventing homelessness for families and individuals at risk of becoming homeless.</p> <p>Actual proposed outcomes are refined after awards are announced, to reflect funds that will actually be available as a result of the amount awarded.</p>  |

**Questions not applicable to ESG, and thus without responses in the ESG Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

|  |   |
|--|---|
| <b>State Program Name:</b>   | <b>Housing Opportunities for Persons with HIV/AIDS (HOPWA)</b>  |
| <b>Funding Sources:</b>  | HOPWA   |
| <b>Describe the state program addressed by the Method of Distribution.</b>   | Dependent on availability of funding, the SC Department of Health & Environmental Control (DHEC) allocates HOPWA funds to TBRA and Supportive Housing Facility operating costs necessary to continue current operations. Remaining funds are allocated through a formula based on prevalence by county and allocated to Project Sponsors providing STRMU, PHP, and Supportive Services. The allocation for each of these services is determined by the Project Sponsor annually based on local needs. Estimates are initially provided. Then, once the final funding is known, if funding is reduced, all services are eligible for a proportional decrease. If funding is increased, TBRA, STRMU, PHP, and Supportive Services are eligible for a proportional increase.   |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | <p>Project Sponsors are awarded through a competitive Request for Grant Application (RFGA) process. All HOPWA RFGAs are scored on the following criteria: Program Description, Organization History, Experience, and Qualifications, Community Assessment, and Reports and Evaluation. Within the application process, applicants must describe how they will serve all counties in their service area with STRMU, PHP, Supportive Services, and referral to TBRA. All counties in the service area must be covered, ensuring that clients in every county of the state's jurisdiction have access to HOPWA funds.</p> <p>RFGAs are also used to award the TBRA and Facility Based Housing contracts. The TBRA provider must provide TBRA to all counties within DHEC's HOPWA jurisdiction. The Facility Based Supportive Housing provider must be available to taking clients statewide.</p>   |
| <b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b> | <p>DHEC distributes HOPWA funds to Project Sponsors, which are typically regional Ryan White Part B Service Providers, eligible non-profit organizations and/or local health departments that assist persons with HIV/AIDS. Grass-roots faith based organizations and other community-based organizations are eligible to apply.</p> <p>Project Sponsors for STRMU, PHP, Supportive Services, and referral to TBRA are awarded through a competitive Request for Grant Application (RFGA) process. The RFGA process is also used to award the statewide TBRA and Facility Based Housing contracts.</p> <p>All RFGAs are advertised on the DHEC website and in the South Carolina Business Opportunities (SCBO) newsletter in the fall, preceding the March 31st end of the contract period. All providers known by DHEC to be serving people living with HIV/AIDS are contacted regarding the release of the RFGA.</p> <p>HOPWA RFGA Award Notification is posted on the DHEC website. Emails with the link to the Award Notification are sent to all applicants. After the dispute period, grant</p> |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

|   |   |
|---|---|
| <b>State Program Name:</b>  | <b>Housing Opportunities for Persons with HIV/AIDS (HOPWA)</b>  |
|   | agreements are made with the awarded entity. These contracts typically run for 3 years.   |
| <b>Describe how resources will be allocated among funding categories.</b> | <p>DHEC allocates funding for TBRA based on current utilization of the program and availability of funding.</p> <p>Operating costs for Facility Based Supportive Housing are established by DHEC based on the reasonable needs of the program and historical costs to operate the facility.</p> <p>Remaining funds are allocated through a formula based on HIV prevalence rates by county, to Project Sponsors that provide STRMU, PHP, and Supportive Services. The allocation for each of these services is determined by the Project Sponsor annually based on local needs. Estimates are initially provided. Then, once the final funding is known, if funding is reduced, all services are eligible for a proportional decrease. If funding is increased, TBRA, STRMU, PHP, and Supportive Services are eligible for a proportional increase.</p> <p>For Program Year 2019, the HOPWA allocation is \$2,061,285. After allocation to counties based on HIV prevalence and Project Sponsor allocations amongst services, the distribution of the 2019 funding amongst activities is:</p> <ul style="list-style-type: none"> <li>• STRMU - \$313,318</li> <li>• Supportive Services (including Permanent Housing Placement) - \$805,668</li> <li>• TBRA - \$558,000</li> <li>• Operating Costs for Facility Based Housing - \$182,500</li> <li>• Sponsor Admin - \$139,961</li> <li>• State Program Admin - \$61,838</li> </ul> <p>Note that expected carry forward funds of \$100,000 are also included in Total Expected Funds on AP-15. These funds will be allocated to TBRA.</p> |
| <b>Describe threshold factors and grant size limits.</b>                  | <p>The TBRA Project Sponsor maximum annual award is \$600,000.</p> <p>The maximum annual award for Facility Based Supportive Services Operating costs is \$190,000.</p> <p>Project Sponsor awards are dependent upon the HOPWA award amount, but range from \$5,000 to \$156,000. The award amount is based on the prevalence of HIV/AIDS in the Project Sponsor service area.</p>  |
| <b>What are the outcome measures</b>                                      | The primary objective of DHEC's statewide HOPWA program is to keep People Living with HIV/AIDS (PLWHA) from becoming homeless and promote stable housing.   |

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

| State Program Name:                                 | Housing Opportunities for Persons with HIV/AIDS (HOPWA)   |
|---|---|
| expected as a result of the method of distribution? | <p>HOPWA enables eligible persons with HIV/AIDS and their families to secure and sustain decent, safe and sanitary housing.</p> <p>HOPWA measures outcomes in terms of the numbers of clients served with TBRA, households provided with permanent housing placement, households provided with supportive services such as case management, employment assistance, transportation, and alcohol and drug abuse services, and the number of households residing in units supported with HOPWA operating funds.</p> <p>Other outcome measures for TBRA and STRMU services are housing stability and temporary stability with reduced risk of homelessness. For supportive services, HOPWA measures the percentage of clients served who receive support for stable housing, as well as the percentage that have access to support, access to health care, and who have a source of income. Of those in TBRA, 85% remained stable at the end of FY17. In the same time period, of those receiving STRMU, 8% were stable and 86% were temporarily stable with reduced risk of homelessness. Of those receiving supportive services, 99% received support for stable housing, 95% had access to support, 94% had access to health care, and 92% had a source of income.</p> <p>These prior year housing stability outcomes are target measures going forward.</p> |

**Questions not applicable to HOPWA, and thus without responses in the HOPWA Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

**Discussion:**

## AP-35 Projects

### AP-35 Projects – (Optional)

#### Introduction:

The five Consolidated Plan Programs, CDBG, HOME, NHTF, ESG and HOPWA, have each developed a plan for how they will distribute HUD funding for 2019. These plans are described more completely in the program and application documents available for download from each Program's website, as well as in AP-25 Allocation Priorities and AP-30 Method of Distribution. Because funds are generally distributed through programs of competitive funding, specific projects are not known in advance of completion of the program year, receipt of all applications for funding and completion of all funding decisions.

| # | Project Name |
|---|--------------|
|   |              |

**Table 8 – Project Information – Intentionally left blank**

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

Each Program has identified various programs or activities that will be funded during 2019, and that will directly contribute toward achieving the goals defined in this plan. Funding for each of these programs or activities are described in program-specific sections of AP-30, Method of Distribution. But in general, the CDBG, HOME and NHTF, and ESG programs for 2019 are designed to address the three priority needs, Decent Housing, Suitable Living Environment, and Economic Opportunity. Allocation priorities are based on expected funding and program evaluation of relative need amongst the related objectives identified in the Plan. For HOPWA, DHEC allocates funding for TBRA, Facility based Supportive Housing, STMRU, PHP, and Supportive Housing, as each of these are successful in preventing homelessness of persons with HIV. CDBG-DR, which is not included in the Consolidated Plan and has its own, separate Action Plan, has been prioritized exclusively for housing rehab and replacement for eligible individuals affected by the 2015 Severe Storm and Hurricane Matthew.

Please see AP-25, Allocation Priorities for more details on how the methods of distribution for each Consolidated Plan program will address priority needs.

Regarding obstacles to meeting underserved housing and community development needs, the primary obstacle in South Carolina is funding. Many local governments in this state have very limited local resources, making funding from other sources particularly important, and existing resources continue to shrink. Demand for assistance, on the other hand, is growing as the number of lower income individuals, families, and neighborhoods in need, coupled with the complexity of issues they face, is driving a steady increase in the scale and cost of needed assistance. The combination of these factors places substantial new burdens on an already strained housing and community development delivery system.

Capacity and resource coordination are also significant obstacles. Infrastructure deficiencies are persistent impediments to the State's ability to address long-standing community needs. Insufficient expertise, funding, and planning plague a disproportionate number of South Carolina's rural areas. Capacity

## **AP-35 Projects**

limitations as well as inadequate resource coordination are barriers to undertaking crucial quality of life improvements. Consequently, much needed new development or upgrades in housing, infrastructure, and community facilities are not made. Prolonged periods of disinvestment and decline have resulted in some economic and social decline in many communities across the state.

## **AP-38 Project Summary**

### **AP-38 Project Summary**

#### **Project Summary Information**

The five Consolidated Plan Programs - CDBG, HOME, NHTF, ESG and HOPWA, have each developed a plan for how they will distribute HUD funding for 2019. These plans are described more completely in the program and application documents available for download from each Program's website, as well as in AP-25 Allocation Priorities and AP-30 Method of Distribution. Because funds are generally distributed through programs of competitive funding, specific projects are not known in advance of completion of the program year, receipt of all applications for funding, and completion of all funding decisions.

## **AP-40 Section 108 Loan Guarantee**

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

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

No

#### **Available Grant Amounts**

Not applicable.

#### **Acceptance process of applications**

Not applicable.

## **AP-45 Community Revitalization Strategies**

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

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

No

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

The State does not use Community Development Strategy Areas within its CDBG Program.

## AP-50 Geographic Distribution

### AP-50 Geographic Distribution – 91.320(f)

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

The five HUD programs included in this Consolidated Plan generally do not allocate funding availability by region. Instead, CDBG, HOME, and NHTF allocate funding availability by program, with each year's programs designed to address the various objectives and priority needs described in this plan.

ESG makes funding available through one competition, with no regional targeting of funds but with a goal of distributing funds throughout the state. To that end, ESG's scoring process ranks applicants against others from the same Continuum of Care region.

HOME and NHTF funding will give preference to those counties in the state that have not received assistance in the last two funding cycles. And no county can receive more than 20% of the current year's HOME allocation.

HOPWA serves all areas of the state except the three areas that are HOPWA entitlement communities (Columbia, Charleston and Greenville) and the counties that fall in North Carolina and Georgia HOPWA entitlement communities. The amount of HOPWA assistance is based on HIV prevalence rates.

#### Geographic Distribution

| Target Area | Percentage of Funds |
|-------------|---------------------|
|             |                     |

Table 9 - Geographic Distribution

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

For non-statewide services, HOPWA funds are allocated to Project Sponsors by county based on HIV/AIDS prevalence rates.

#### Discussion

## AP-55 Affordable Housing

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

#### Introduction:

This section provides the State's estimate of the number of households that will receive affordable housing, based on the goals set forth in AP-20, Annual Goals and Objectives. HUD specifies that the number of households estimated in the tables below should not include those expected to benefit from emergency shelter, transitional shelter or services. Also, the totals by household type (top table) and program type (bottom table) must match. Therefore, only goals specifically related to the provision of affordable rental housing, involving production of new units or rehab of existing units, or accomplished as a result of acquisition of existing units are reflected in the tables below. These goals include the AP-20 goals for new affordable rental housing (130) and the combined TBRA goal for people living with HIV/AIDs and other special needs (resulting from the HOME agreement with the SC Department of Mental Health) (150). If the State had a goal for 2019 for the preservation of existing affordable housing, this goal would also be reflected here. (Note that the absence of a preservation goal does not indicate no expected accomplishments in 2019, only that this activity is unpredictable and does not lend itself to estimating accomplishments. Accomplishments, if any will be reported in the CAPER.)

| One Year Goals for the Number of Households to be Supported |            |
|---|------------|
| Homeless  | 0          |
| Non-Homeless  | 130        |
| Special-Needs   | <u>150</u> |
| Total   | 280        |

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

| One Year Goals for the Number of Households Supported Through |          |
|---|----------|
| Rental Assistance   | 150      |
| Production of New Units                                       | 130      |
| Rehab of Existing Units                                       | 0        |
| Acquisition of Existing Units                                 | <u>0</u> |
| Total   | 280      |

**Table 11 - One Year Goals for Affordable Housing by Support Type**

#### Discussion:

Goals shown on AP-20 were used to arrive at the totals above, according to HUD guidance, as follows:

#### Table 8 - Household Types to be Supported:

- Homeless - Per HUD, this estimate should be the annual goal for housing assistance for units reserved for homeless individuals and households. None are estimated, as none of the programs specifically reserve housing units for homeless individuals. Further, although ESG applicants may

## AP-55 Affordable Housing

request funding for a variety of activities related to homeless shelter, outreach services, preventive services for those at risk of becoming homelessness, and transitional housing, according to HUD none of these activities should be included in the Table 8 homeless category.

- Non-Homeless - Per HUD, this estimate should be the total goal for all housing units NOT reserved for homeless individuals, except those that are reserved for households that are not homeless but require specialized housing or supportive services, and which are included in the Special Needs goal. The figure above is the total of the goals for new rental units, homeownership assistance and preservation of existing affordable housing.
- Special Needs - See above. This should be the goal for housing assistance for units reserved for households that are not homeless but require specialized housing or supportive service, such as HOPWA TBRA and HOME TBRA under agreement with the SC Department of Mental Health.

### Table 9 - Households Supported through Activities:

- Rental Assistance - TBRA goal
- New units - New rental units goal
- Rehab of Existing Units – No preservation of existing affordable housing goal proposed for 2019
- Acquisition of Existing Units - No homeownership goal proposed for 2019

## **AP-60 Public Housing**

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

#### **Introduction:**

SC Housing serves as the Local Housing Authority in the administration and delivery of rental assistance under HUD's Section 8 programs, does not operate, own, or manage any public housing units. Instead, community based Public Housing Authorities (PHAs) located in the states larger suburban and metropolitan areas own and manage public housing developments. SC Housing supports the local PHAs with financing and/or technical assistance and thereby helps the PHAs achieve the federal program objectives of encouraging homeownership, self-sufficiency, and youth development, but the state does not undertake public housing resident management or ownership initiatives.

During the development of the Consolidated Plan, the State reviewed the plans of public housing authorities in South Carolina. These plans indicate a general trend toward concepts of family self-sufficiency, individual development accounts, and homeownership programs.

To the State's knowledge, there are no outstanding court orders, consent decrees, or HUD sanctions that would either prevent or negatively impact the delivery of affordable housing to low income persons and families or impede implementation of the Consolidated Plan.

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

Not applicable.

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

Not applicable.

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

Not applicable.

#### **Discussion:**

## **AP-65 Homeless & Other Special Needs**

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

#### **Introduction**

The Emergency Solutions Grant Program is targeted at homeless activities, as described below.

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

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

The Emergency Solutions Grant Program has placed greater emphasis on Street Outreach over the last several years, and accomplishments to date in 2018 represent a significant increase over past years as a result. This trend is expected to continue.

Street Outreach involves identifying places in the community where unsheltered homeless have been typically found, by law enforcement, community service workers or homeless count volunteers. Then a street outreach worker will physically go to those places, in an attempt to locate unsheltered homeless persons, engage them, identify needs and connect them with emergency shelter, housing or critical services, or provide them with urgent, non-facility based care. Since homeless individuals are often distrustful and uneasy sharing personal information, this process takes time and effort. Initial efforts focus on small engagements like providing hygiene kits, and providers use that initial interaction to build trust. This in turn allows greater efforts at identifying specific needs and connecting individuals with services that can benefit them. Street outreach activities can include case management, emergency health and mental health services, transportation and services for special populations.

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

The Emergency Solutions Grant Program addresses the need for emergency shelter by allocating up to 60% of total funding each year for Emergency Shelter operations and services. However, because of a HUD ruling, transitional housing is no longer an eligible cost and ESG funding cannot be used for this purpose.

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

The Emergency Solutions Grant Program provides funding for services that specifically address the needs identified above, to help homeless individuals and families transition to permanent housing and to prevent

## **AP-65 Homeless & Other Special Needs**

the recurrence of homelessness. The goal is to use housing relocation, stabilization services or short-term rental assistance to “re-house” individuals and families living in shelters or unsheltered situations. This involves assistance to help move them, as quickly as possible, out of homelessness into a more stable housing situation and to set them up for future success. Providers can use ESG funds to assist with short-term rental assistance, rental arrears, rental application fees, security and utility deposits, utility payments, moving costs, and a range of services including housing search and placement, case management, tenant legal services, landlord-tenant mediation and credit repair.

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

The Emergency Solutions Grant Program has funds available for preventive services, to help eligible individuals and families avoid homelessness. Although the ESG Program has a prohibition against discharge planning that prevents the use of ESG funds to facilitate discharge, a person discharged from an institution can still benefit from the services ESG recipients can provide. Funds are available for housing relocation, stabilization services and short term rental assistance, as necessary to prevent the individual or family from moving to an emergency shelter, onto the streets or into other places not meant for human habitation. Recipients may use ESG to funding to assist with short-term rental assistance, rental arrears, rental application fees, security and utility deposits, utility payments, moving costs, and a range of services including housing search and placement, case management, tenant legal services, landlord-tenant mediation and credit repair. The goal is to prevent an individual or family from moving to an emergency shelter or into an unsheltered situation and to achieve housing stability.

### **Discussion**

## AP-70 HOPWA Goals

### AP-70 HOPWA Goals – 91.320(k)(4)

| One year goals for the number of households to be provided housing through the use of HOPWA for:             |     |
|--|-----|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family        | 175 |
| Tenant-based rental assistance   | 125 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds               | 10  |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0   |
| Total  | 310 |

HOPWA Goals are also outlined in AP-90 Program Specific Requirements, HOPWA.

## **AP-75 Barriers to Affordable Housing**

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

#### **Introduction:**

Affordable housing development can be impeded by a variety of factors including zoning and land use policy, administrative and processing procedures involved in review, permitting and approval of housing development, property taxes, exactions and fees, local building codes, transportation, development and infrastructure costs and neighborhood opposition to local affordable housing development, or an attitude known as NIMBY, or “Not In My Backyard.”

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

- SC Housing will continue to host its annual Palmetto Affordable Housing Forum: a conference which encompasses topics, education and skills necessary to implement strategies and overcome barriers such as the need to change zoning restrictions, change state and local fees, and change local building codes that impede the production of affordable housing. The next Annual Palmetto Affordable Housing Forum will be held in Spring 2020.
- In 2019, SC Housing will continue the SC Mortgage Tax Credit Program to help homebuyers make their mortgages more affordable. It is a Mortgage Credit Certificate Program administered by SC Housing which provides a federal income tax credit to qualified homebuyers for every year they occupy the home as their primary residence. This program was begun in 2012.
- SC Housing's Palmetto Heroes Program will continue to assist local “heroes” to become homeowners. Eligible homebuyer “heroes” include law enforcement officers, teachers, veterans, fire fighters, nurses, correctional workers and EMS personnel. The program provides a reduced mortgage interest rate and down payment assistance.
- SC Housing will hold Lender Partner and SC State Housing Authority Certified Real Estate Professional training classes at locations throughout the state. The Lender Partner training covers program requirements such as home price limits, income limits, and the SC Housing loan process. Certified Real Estate Professional training covers SC Housing programs availability and eligibility and requirements for SC Housing loans. Legal and Real Estate continuing education sessions were also included in the Palmetto Affordable Housing Forum. The overall purpose is to increase awareness of housing programs and resources to expand the supply of affordable housing and increase homeownership opportunities in the state.
- SC Housing will maintain its expanded social media presence as a means of communicating information to housing partners, homeowners and renters and others interested in housing in the state. The agency has continued its use of Twitter and Facebook. SC Housing’s use of these innovative electronic tools and technologies has allowed it to operate more efficiently and

## **AP-75 Barriers to Affordable Housing**

communicate in a more dynamic and timely way. In November of 2017, SC Housing launched a new website designed to, hopefully, make finding information easier for South Carolinians as well as create less "clicks."

- SC Housing will award funds for construction or to facilitate construction of new affordable rental housing units. HOME, NHTF, and other SC Housing administered funds in these projects directly lower the cost of the unit and thereby make rental units more affordable. SC Housing will provide other funds (not HOME) for down payment and closing cost assistance and below market interest rate financing to make homeownership more affordable and financing simpler and more available.
- Authority staff will spend time meeting with Senators and Representatives on an ongoing basis to educate them on the various affordable housing programs the Authority administers as well as to review several annual reports with them: Accountability Report, Affordably Housing Statewide Impact Report, Investment Report, and HTF Annual Report. This interaction enables the Senators and Representatives to understand the need for, as well as the impact of, affordable housing in their areas, and this in turn helps them discuss the positives of affordable housing when their constituents call with NIMBY issues and concerns.

### **Discussion:**

## **AP-85 Other Actions**

### **AP-85 Other Actions – 91.320(j)**

#### **Introduction:**

The Consolidated Plan regulations require the State to address other actions to meet specific initiatives identified by HUD. These actions are summarized below.

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

The primary obstacle to meeting underserved housing and community development needs of the state is funding; and existing resources continue to shrink. Demand for assistance, on the other hand, is growing as a result of recent economic conditions and typically exceeds the supply of available resources. The number of lower income individuals, families, and neighborhoods in need, coupled with the complexity of issues they face is steadily increasing in both scale and cost. The combination of these factors places substantial new burdens on an already strained housing and community development delivery system.

Capacity and resource coordination are also significant obstacles. Infrastructure deficiencies are persistent impediments to the State's ability to address long-standing community needs. Insufficient expertise, funding, and planning plague a disproportionate number of South Carolina's rural areas. Capacity limitations as well as inadequate resource coordination are barriers to undertaking crucial quality of life improvements. Consequently, much needed new development or upgrades in housing, infrastructure, and community facilities are not made. Prolonged periods of disinvestment and decline have resulted in some economic and social decline in many communities across the state.

The State's strategy to overcome existing deficiencies in its housing and community development efforts is based on collaboration, education, outreach, and comprehensive planning. Consumers, providers, funders, policy makers, advocates and communities can benefit from increased communication, training and technical assistance to establish meaningful solutions to the housing and community development needs and improved quality of life among lower income populations.

A greater emphasis is being placed on collaboration among partners as the most effective means to reach community and economic development goals. South Carolina is poised to turn a corner in its economic structure, and utilizing our resources along with others will be the only way to make positive change. CDBG is making specific efforts to help make communities more economically competitive.

The CDBG program recognizes obstacles concerning funding and underserved needs. To address limited funding, the CDBG program requires that recipients generally provide a match for most types of projects and encourages leveraging of financial and other resources. This financial vested interest on the part of the recipient encourages the timely and successful completion of projects as well as the careful selection of projects that best meet the needs of the community.

## **AP-85 Other Actions**

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

The primary resources for addressing affordable housing in South Carolina are administered by the SC Housing, which administers the HOME and NHTF Programs, along with the programs described below:

- South Carolina Housing Trust Fund - established in 1992 using funding from a dedicated portion of the deed stamp tax. Funding is available to eligible non-profit housing development sponsors in all 46 counties, are awarded on a quarterly basis and can be used to finance the development of affordable group homes for the disabled, emergency housing for battered women and their children, single room occupancy units for working homeless and disabled veterans, multifamily rental units low-income, individuals, families, the elderly, and etc., and owner-occupied rehabilitation for any homeowner that is at 50% or below the area median income for the county in which they live.
- Multifamily Tax Exempt Bond Program - provides permanent real estate financing for property being developed for multifamily rental use through the sale of tax-exempt revenue bonds. Financing is available to non-profit and for-profit sponsors, or developers, who agree to set aside: a) at least 20% of the units for households with annual gross incomes at or below 50% of the area median income, or b) 40% or more of the units for households whose annual gross income is at or below 60% of the area median.
- Low Income Housing Tax Credit Program - a federal program that provides an incentive to owners developing affordable multifamily rental housing. Allocations of credits are used to leverage public, private and other funds in order to keep rents affordable. Developments that may qualify for credits include new construction, acquisition with rehabilitation, and rehabilitation and adaptive re-use. Developers who are awarded tax credits must agree to keep apartments affordable and available to lower income tenants for at least 30 years. Annually, SC Housing establishes priorities and needs in its QAP, or Qualified Tax Credit Allocation Plan. Ten percent of the State's annual LIHTC allocation is reserved for the exclusive use of joint venture projects that involve the substantive participation of qualified non-profit organizations.
- Section 8 - State-administered and includes Housing Choice Vouchers, Moderate Rehabilitation, and Homeownership Vouchers. The Voucher Program provides rental assistance in the private rental market to very low income individuals and families in Cherokee, Clarendon, Colleton, Dillon, Dorchester, Fairfield, Kershaw, Lee, Lexington, Spartanburg and Williamsburg Counties.
- Neighborhood Stabilization Program (NSP) – NSP's purpose since 2008 has been to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within their communities. NSP provided grants to purchase foreclosed or abandoned properties and to rehabilitate, resell, or redevelop these properties in order to stabilize neighborhoods and stem the decline of house values of neighboring homes. The program is winding down, but NSP still has program income and open land banked activities. NSP has its own Action Plan through HUD's DRGR system, which will be amended to reflect additional resources and activities resulting from program income.

## **AP-85 Other Actions**

Actions planned to foster and maintain affordable housing are continued in "Discussion" section below.

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

The following are strategies and possible resources available to the State to combat the danger that lead based paint hazards present to children. Typically, Federal programs are limited in scope and are targeted to only certain population or housing sectors. Moreover, they often do not fully address testing children for elevated blood levels or abating lead from all housing, schools or childcare facilities. Attention should be focused first on units posing the greatest hazard and on strategies designed to meet the special needs of those populations feared most at risk. South Carolina's resources to reduce the lead-based paint (LBP) hazard include:

- Lead hazard abatement is an eligible activity under the HOME, Neighborhood Stabilization Program (NSP), Neighborhood Initiative Program (NIP), NHTF and CDBG programs for projects involving repair, rehabilitation, or demolition of housing. All programs provide guidance regarding required steps to evaluate, address and/or abate lead, safe work practices, and notification procedures.
- Lead hazard requirements/guidelines consist of written notification via brochure notifying tenants and potential homebuyers of dangers of lead-based paint poisoning. All beneficiaries must read and sign the documentation prior to occupying the unit.
- SC Housing's Low Income Housing Tax Credit, Homeownership, Mortgage Assistance and Housing Trust Fund Programs require compliance, disclosure and/or testing in accordance with federal requirements.
- Recipients of HOME, NHTF and CDBG funds are encouraged to identify additional sources of funding to assist with lead hazard activities related to projects where rehabilitation is not funded. Examples include HUD Lead Safe Homes and other grant programs and private sector resources that may be available.

The SC Department of Health and Environmental participates in the Environmental Health Public Tracking System (EHPT) of the US Centers for Disease Control and Prevention. To facilitate its participation, DHEC had to streamline its own lead database so that it could provide required EHPT data and incorporate data from the Adult Blood Lead Epidemiology and Surveillance Program.

Note that South Carolina law requires physicians to report conditions, including suspected lead poisoning, on the DHEC List of Reportable Conditions to their local public health department, and laboratories are required to report all blood lead values in children less than six years of age. As a result, DHEC now provides several data resources for the number and percent of children tested for lead by age group and children tested for lead with Elevated Blood Lead Levels (EBLL).

The state will also continue to take the following actions in addressing lead-based paint hazards in pre-1978 housing:

## **AP-85 Other Actions**

- Provide information and guidance related to lead-based paint hazard reduction to recipients of CDBG, HOME, NSP, NIP and NHTF, including training as necessary.
- Continue to require notification of residents and owners of all houses receiving CDBG, HOME, NSP, NIP and NHTF assistance regarding the hazards of lead-based paint.
- Incorporate lead hazard reduction strategies, in accordance with HUD requirements, in all HUD assisted housing rehabilitation and provide technical assistance on an as needed basis to ensure compliance with program policies and procedures and HUD notification requirements.

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

Poverty in South Carolina persists despite continuous efforts to combat it. According to the US Census Bureau, data from the 2016 ACS 5-Year Estimates indicates that there are 2.17 million people living in the state's 396 towns, cities and other "census places", and 21.9% are below the poverty level. More than one third of the state's census places have poverty rates of 25% or higher. More than half have poverty rates of 20% or higher. (Note that total population is those for whom poverty status can be determined.) The State is in the process of updating its census place level poverty analysis to reflect the December 2018 release of the 2017 ACS 5-Year data.

Statewide, the most recent 2017 ACS 5-Year Data was released in December 2017 and can be readily used to evaluate poverty in South Carolina as a whole, and in its 46 counties. The state's overall poverty rate of 16.6% compares with 15.9% for the US South and 14.6% for the nation as a whole. This reflects continued improvement in recent years for the state, region and nation. However, at the county level, 34 of the state's 46 counties have poverty rates above the state average, including 23 of the state's most rural counties where 20% or more of the population is below poverty. These county level numbers indicate only slight improvement over the 2015 ACS 5-Year Data, which indicated 33 counties with poverty rates above the state average and 26 with poverty rates over 20%.

Addressing this issue falls within the purview of numerous state agencies, including the Department of Social Services, the Department of Employment and Workforce, the Department of Health and Human Services, the Department of Education, the Commission on Minority Affairs and the Department of Commerce. Each of these agencies has a mission and undertakes planning activities (such as TANF plans) which encompass one or more of the factors shown to cause poverty: insufficient education, lack of economic opportunity, health and social problems and lack of self-sufficiency. The key means with which a state can combat poverty in the short-term is to create economic opportunity and provide opportunities for working age adults to improve skill levels and successfully compete for new and better paying jobs as these opportunities become available. Over the longer term, K-12 education and programs to combat health and social problems and address disparities in access to services and support are also important. The latter, however, are beyond the scope of the agencies involved in this Consolidated Plan.

## **AP-85 Other Actions**

What is within the scope of the Consolidated Plan is the expansion of economic opportunity, primarily using CDBG funds to address issues which are obstacles to economic opportunity, such as low workforce skills, absence or inadequacy of basic public infrastructure and services needed to support economic growth, and downtown and commercial centers that lack vitality and are not conducive to small local business growth, residential growth or a large and thriving employer base. For those areas which can support business and industrial growth, CDBG funds can also be used, where appropriate and feasible, to help facilitate job creation by new or existing expanding businesses. The CDBG Program Description describes programs of CDBG funding that can assist with expanding economic opportunity and business development or job creation/retention for the 2019 Program Year.

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

The State's strategy to enhance its housing and community development institutional structure centers around improved education, outreach, comprehensive planning and coordination. Consumers, providers, financiers, policy makers, advocates and communities benefit from increased cross-sector communication (dialogue) and education in understanding that economic factors are inextricably linked with meaningful solutions to housing needs and improved quality of life among lower income populations.

Both public and private sector agencies, organizations and institutions contribute to the State's delivery infrastructure for affordable housing and community development. These agencies and organizations are important development partners in South Carolina. Some have established histories as partners with the State; many more are new and emerging collaborators. All are tremendously vital resources in South Carolina's continuing challenge to address the affordable housing and improved community and economic development needs of lower income households.

In terms of housing development in particular, coordination is facilitated by combining the administration of HOME and most other federal and state programs for housing in one agency: SC Housing. Community and economic development is the mission of the SC Department of Commerce, which manages CDBG as well as other state resources that can be used for these two purposes, notably including Appalachian Regional Commission funding and the State Rural Infrastructure Fund. The Secretary of the SC Department of Commerce also heads the board of the State Rural Infrastructure Authority. Finally, the SC Department of Commerce and Rural Infrastructure Authority routinely meet with other sources of infrastructure funding, such as the SC Department of Health and Environmental Control and USDA, to discuss projects, needs and priorities in an effort to better coordinate the delivery system.

Together, agencies and organizations in the state contribute significant financial and technical resources to benefit low and moderate income individuals and families of the State. These contributions help capitalize outreach, education and development initiatives. Private and local funds are leveraged with Federal and State funds in order to implement affordable housing and community development initiatives Statewide. Each entity, public or private, pass-through or direct provider, offers services to low income persons and is considered a critical component of South Carolina's housing and community development delivery system.

## **AP-85 Other Actions**

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

The SC State Housing Finance and Development Authority does not own or operate any public housing. However, private developers that receive Authority funds are encouraged to communicate with other housing providers within a project's community as part of the project development process.

#### **Discussion:**

- SFHDA also administers SC Help aimed at maintaining homeownership and making it more affordable and sustainable by providing direct assistance to homeowners potentially facing foreclosure. This program is also winding down.
- Mortgage Revenue Bond Program - the State's primary tool for expanding homeownership opportunities for low and moderate income families in South Carolina. The sale of tax exempt bonds to investors provides the bulk of the funding available to qualified, first-time homebuyers. Banks and mortgage companies originate mortgage loans on the agency's behalf and offer them at reduced interest rates. This below market rate financing provides the edge needed to make homeownership affordable for many of the State's lower income residents. Maximum purchase price and borrower income limits apply and typically vary by county.

## AP 90 Program Specific Requirements

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

#### Introduction:

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

##### Reference 24 CFR 91.320(k)(1)

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

|  |               |
|--|---------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed  | 18,000        |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0             |
| 3. The amount of surplus funds from urban renewal settlements  | 0             |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan   | 0             |
| 5. The amount of income from float-funded activities   | 0             |
| <b>Total Program Income:</b>   | <b>18,000</b> |

#### Other CDBG Requirements

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

## **AP 90 Program Specific Requirements**

### **HOME Investment Partnerships Reference 24 CFR 91.320(k)(2)**

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

No other forms of investment are anticipated being used.

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

There are no plans to finance homeownership activities.

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

There are no plans to finance homeownership activities.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to refinance debt.

## **AP 90 Program Specific Requirements**

### **Emergency Solutions Grant Program Reference 91.320(k)(3)**

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

In order to receive ESG assistance, an individual or family must fit one of the HUD definitions of homeless, chronically homeless or at risk of homelessness. These definitions are included at the bottom of this section.

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

All four CoC's have established a basic CES system. Right now State ESG staff, as well as a HUD representative, participate in the policy and procedures standards committee. Currently, highest ranking of VI-SPADAT + location and other various attributes will get an individual served first in CES.

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

Awards will be made through an application and scoring process. Applications received from agencies in one Continuum of Care region will be compared to other applications from other agencies within their continuum as opposed to all applications from all areas of the State. This was new beginning in 2018, at which time State ESG staff also began consulting with each continuum to help identify specific needs in each continuum.

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

Homeless participation is a requirement of the application. Failure to demonstrate this in an application means the application is incomplete and therefore not eligible.

5. Describe performance standards for evaluating ESG.

Subrecipients are evaluated based on planned expenditures vs actual expenditures. While this is the most important aspect, ESG staff also look at planned number of people served vs actual people served and take into account accurate and timely submission of all requested reports and information.

**AP 90 Program Specific Requirements  
National Housing Trust Fund**

Reference 24 CFR 91.320(k)(5)

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

☒ Applications submitted by eligible recipients

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

N/A

**3. If distributing HTF funds by selecting applications submitted by eligible recipients,**

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

Eligible Recipient: An organization, agency, or other entity (including a public housing agency, a for profit or a nonprofit entity) that receives assistance as an owner or developer to carry out an affordable housing project. An eligible recipient must:

1. Make acceptable assurances to the Authority that it will comply with the requirements of all applicable federal and state housing programs during the entire period that begins upon selection of the recipient to receive funding, and ending upon the conclusion of all funded activities;
2. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity(ies);
3. Demonstrate its familiarity with the requirements of other federal, state, or local housing programs that may be used to ensure compliance with all applicable requirements and regulations of such programs; and
4. Have demonstrated experience and capacity to conduct an eligible activity(ies) as evidenced by its ability to own, construct, and manage and operate an affordable multifamily rental housing development.

**AP 90 Program Specific Requirements  
National Housing Trust Fund**

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

Refer to AP-30 Method of Distribution and the HOME & NHTF Method of Distribution Attachment to this Action Plan.

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

Refer to AP-30 Method of Distribution and the HOME & NHTF Method of Distribution Attachment to this Action Plan.

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

Refer to AP-30 Method of Distribution and the HOME & NHTF Method of Distribution Attachment to this Action Plan.

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

Refer to AP-30 Method of Distribution and the HOME & NHTF Method of Distribution Attachment to this Action Plan.

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

This year, SC Housing is not including a preference for PBRA in those applications requesting NHTF, but is utilizing the SC HTF to assist in developing NHTF-assisted units so that there is no debt burden and projects can operate efficiently with sufficient cash flow and therefore, ensuring rents are affordable to extremely low-income families.

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

This year, SC Housing is not asking Applicants to voluntarily take on a longer affordability period than the required 30-year period. SC Housing is actually trying to assist by ensuring all awarded applications are able

## **AP 90 Program Specific Requirements National Housing Trust Fund**

to cash flow for the entire 30-year period which is a difficult task.

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

South Carolina's priority housing needs as listed in the State's Consolidated plan are:

- Improve affordable housing opportunities statewide, particularly rental housing.
- Support of transitional and supportive housing facilities for people with disabilities, HIV/AIDS, and other special needs.
- Preservation of affordable housing.
- Identify additional sources for rental assistance.
- Homeless prevention and rapid re-housing.

Each application must address at least one of the above priority housing needs. As designed, South Carolina's NHTF program will be available to new construction affordable rental housing units only. As such, all applications will meet the first listed priority; a. Improve affordable housing opportunities statewide, particularly rental housing. Depending on the variety of applications submitted, additional priority housing needs may also be addressed with the exception of item c. Preservation of affordable housing. It is anticipated that rehabilitation of affordable housing will be available through South Carolina's NHTF program next year and subsequent years.

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

All applications for NHTF will also receive SC Housing Trust Fund (SC HTF) funding. SC HTF is a non-federal funding source administered by SC Housing. Using non-federal funding sources is such a priority that it has been mandatory since 2018.

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

Yes

**AP 90 Program Specific Requirements  
National Housing Trust Fund**

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

Yes

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

Yes

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

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

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

SC Housing is adopting the HOME Investment Partnerships Program's maximum per-unit subsidy limits for 2019 NHTF funding. The HOME per-unit subsidy limits are being elected for consistency as HOME funds are also used in the Authority's Small Rental Development Program (SRDP). Currently there is only one published limit for SC. Based on our experience administering rental housing development there are no significant differences in costs that would require any geographic adjustment from the posted statewide limits. Adopting the existing HOME limits is allowed by HUD and cost data from 2018 SRDP applications as well as 2016 and 2017 HOME applications indicate the use of the HOME subsidy limits is appropriate for NHTF. The per-unit cap is not the only subsidy test SC Housing will use to allocate NHTF funds that are necessary for a project's affordability and sustainability. Each application will be reviewed and analyzed for compliance with SC Housing's underwriting criteria at initial submission and placed-in -service. Through the underwriting process SC Housing ensures that the level of subsidy provided by NHTF funds:

## AP 90 Program Specific Requirements National Housing Trust Fund

- Will not exceed the actual eligible development costs of the unit
- Are reasonable and necessary and in line with similar projects funded across the state
- Does not unduly enrich developers
- Does not exceed the amount necessary for the project to be successful for the duration of the affordability period.

NHTF per-unit subsidy limits will not exceed the HOME maximum per-unit subsidy limits listed below.

| Bedrooms | Elevator-type Basic Limit* | HCP  | HOME Maximum Per-Unit Subsidy Limit |
|----------|----------------------------|------|-------------------------------------|
| 0 BR     | \$61,281                   | 240% | \$147,074                           |
| 1 BR     | \$70,250                   | 240% | \$168,600                           |
| 2 BR     | \$85,424                   | 240% | \$205,018                           |
| 3 BR     | \$110,512                  | 240% | \$265,229                           |
| 4BR      | \$121,307                  | 240% | \$291,137                           |

<https://www.hudexchange.info/resource/2315/home-per-unit-subsidy/>

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

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

N/A - New Construction Only

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

N/A

**AP 90 Program Specific Requirements  
National Housing Trust Fund**

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

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

N/A

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

N/A

## **AP 90 Program Specific Requirements HOPWA**

HOPWA project sponsors are selected through a competitive grants request for applications (RFGA) process. The RFGAs are advertised on the DHEC website and in the South Carolina Business Opportunities (SCBO) newsletter in the fall preceding the March 31st end of the contract period.

All providers known by DHEC to be serving people living with HIV/AIDS are contacted regarding the release of the RFGA. Grass-roots faith based organizations and other community-based organizations are eligible to apply.

HOPWA RFGA Award Notification is posted on the DHEC website. Emails with the link to the Award Notification are sent to all applicants. After the dispute period, grant agreements are made with the awarded entity. These contracts typically run for 3 years.

DHEC distributes the funds to regional Ryan White Part B Service Providers, eligible non-profit organizations and/or local health departments that assist persons with HIV/AIDS.

HOPWA Goals are specifically addressed on AP-70 HOPWA Goals – 91.320(k)(4). They are also summarized below.

### *One year goals:*

- Short-term rent, mortgage and utility assistance to prevent individual or family homelessness: 175
- Tenant-based rental assistance: 125
- Units provided in housing facilities that are being developed, leased or operated: 10

**Attachments**  
**HOME & NHTF Public Comments & Responses**

**2019 SRDP Public Comments and Responses**

1. **Comment:** What is the rationale for allowing only new construction and from barring PHAs?

**Response:** Rehabilitation is not an eligible project type for the 2019 SRDP funding round, because SC Housing is not currently approved by the U.S. Department of Housing and Urban Development (HUD) to use National Housing Trust Funds for rehabilitation. Public Housing Authorities (PHA's) are not barred from participating and are specifically included in the list of eligible applicants provided on page 7 of the application manual.

2. **Comment:** The imposition of the placed-in-service application created as a requirement in the midst of developments being built plus an overreaching inspections program that no tax credit developer would ever tolerate are two primary causes as to why the HOME program has floundered over the last few years.

**Response:** In addition to being an industry standard best practice, placed-in-service applications are required by HUD regulation for both the HOME and National Housing Trust Fund programs.

The 2013 HOME final rule implemented a higher degree of oversight for all Participating Jurisdictions which now requires PJ's to inspect projects to ensure they are built in accordance with applicable codes, construction contracts, and other construction documents such as plans, specifications, soil reports, etc. SC Housing's inspection program documents compliance these HUD regulatory requirements. The timing of inspections is designed to ensure all components of construction can be viewed prior to them being obscured by subsequent phases of construction.

3. **Comment:** SC Housing was slow to move quickly in understanding that both 30% median income and poverty level incomes could be recognized under the NHTF program, resulting in a delay of giving any awards until this last year.

**Response:** SC Housing began developing its understanding of the income requirements for the NHTF program upon initial announcement of the program. Awarding of the funds has not been delayed and, in fact, SC Housing issued its first awards in 2017. To date, SC Housing has met all HUD funding commitment deadlines for the NHTF program.

4. **Comment:** SC Housing has a responsibility to correct its course and do all it can to revive the SC non-profit development community. The SRDP should attract both non-profits and for-profits given that up to 32 units can be built. Every consideration needs to be given to ensure that all capable SC non-profits are given the opportunity at least to compete in this next SRDP round.

## **Attachments**

### **HOME & NHTF Public Comments & Responses**

**Response:** All qualified non-profits have an opportunity to apply for SRDP funding. In addition, non-profits that receive certification as a Community Housing Development Organization (CHDO) can apply for SRDP funding in the CHDO set-aside. SC Housing has set aside \$1.1 million of HOME funds for CHDOS for 2019.

Establishing standards for organizational capacity is an administrative responsibility of SC Housing as the HUD grantee for the HOME and NHTF programs. As the responsible entity and administrator for the entirety of funding for each project, SC Housing must take steps to ensure awarded applicants are financially solvent and have the financial wherewithal to overcome any development set-back. When projects do not meet HUD completion deadlines or fail to fulfill the requirements for the entire duration of the affordability period, HUD requires that all funding disbursed to such projects be repaid to the U.S. Treasury. SC Housing is responsible for establishing organizational capacity standards that minimize this risk.

- 5. Comment:** I recommend that the definition of Project Completion in definitions be changed along with your present contractual requirements with ongoing developments such that as soon as a project is 100% complete as verified by your inspections staff, the developer should have a full right to obtain their developer fee. Second, completion should be defined only as 100% complete. This definition would exclude inclusion of the requirement that the Placed-In-Service application be submitted and approved and that all HUD reviews have been completed. History indicates that such a review takes up to four to five months after project completion! I consider the Placed-In-Service application as effectively a full audit of a development with the implication that something wrong or illegal has been done. The trust and respect given the SC non-profit community is no longer in evidence.

**Response:** SC Housing's definition of project completion is modeled after HUD's definition of project completion for the HOME and NHTF Programs. There are many additional tasks that must be completed after a project has passed a final inspection to be considered complete. These tasks are time sensitive and must be completed by the regulatory deadlines required by HUD. SC Housing will amend the definition as follows:

***Project Completion:*** Occurs when all necessary title transfer requirements have been finalized; loan closing documents have been recorded and returned to the Authority; one hundred percent (100%) of the construction has been completed; a certificate of occupancy (CO) has been issued; a placed in service application has been submitted; the final draw down of funds has been disbursed for the project; the project completion reports have been submitted and the project activity has been closed-out in HUD's Integrated Disbursement and Information System (IDIS).

## **Attachments**

### **HOME & NHTF Public Comments & Responses**

SC Housing cannot disburse the developer fee until the amount earned has been verified by the placed-in-service application, because we can only disburse funding based on documented eligible project costs. Reviewing these costs prior to disbursing funds is an administrative responsibility of SC Housing as the designated HUD Grantee for these programs. On average, the placed-in-service application review takes 30-45 days from the date a complete and accurate application has been provided.

- 6. Comment:** I further recommend that the February 1 deadline be moved to March 1 since by the time you notify the community of the change, the February 1 deadline would already have passed.

**Response:** The threshold completion requirements for open HOME funded projects have been revised to the following:

- a) All 2015 and prior projects officially closed out (see “project completion” definition) on or before April 15, 2019.
- b) All 2016 projects must have 75% construction completed on or before April 15, 2019 as evidenced by an SC Housing inspection.
- c) All 2017 projects must be in compliance with the HOME Funding Agreement Exhibit A – Implementation Schedule by April 15, 2019.

- 7. Comment:** Could you please clarify the below.

Proposed sites deemed by the Authority to be a new phase to an existing Authority funded development consisting of eight or more units. Does this mean same tract of land, same ownership, adjacent and adjoining parcels, same neighborhood, etc.?

Depending on how this is defined, it could pose some issues. Suppose as an example that Developer A and Developer B both submit an application in Allendale County within the same neighborhood. Developer A has an existing development in the same neighborhood, would Developer A be ruled ineligible and Developer B funded because of this (seems blatantly unfair, especially if A scored better than B)?

If the Development scores well enough to get funded, should that not be the overriding concern, especially if it is in an undeserved county?

**Response:** The intent of the 2019 SRDP is to integrate a small number of affordable housing units (4 to 8) into neighborhoods and communities. To ensure this integration, properties located on sites adjacent to or across the street from any existing SC Housing funded project that contains 8 or more units are prohibited regardless of ownership.

## Attachments

### HOME & NHTF Public Comments & Responses

8. **Comment:** All sites must have a minimum of 4 units and have no more than a maximum of 8 units.

Per your verbal confirmation, and from Chris McMillan today too, it is SC Housing's intention with this regulation to ensure that affordable housing is not congregated or clustered in large numbers in isolation, but rather is integrated into neighborhoods or developments having a diversity of incomes. I applaud this intention! It is exactly what we, and other non-profit affordable housing developers in SC have been doing for some time now—making sure that there is a diversity of incomes surrounding affordable housing, and that affordable housing is indistinguishable (for the most part, at least from the curb) from the market housing around it.

This regulation, however, hinders this where there are opportunities for large tract developments that will incorporate market rate units mixed in with the affordable units.

So, my suggestion is this—why not allow, *in these instances*, the applicant to present a site plan with the application that clearly shows this integration and placement within a larger development showing market units and affordable units interspersed and indistinguishable from the outside, that would allow for contiguous parcels, or one large parcel, to have more than 8 units each site, including the market units? And further, the site plan would show a minimum of a 30/70 mix (affordable vs. market) with the goal of 50/50 if possible.

**Response:** SC Housing continues to evaluate the housing needs of South Carolina and design our programs to meet these needs. We will keep this comment under consideration for future funding rounds.

9. **Comment:** Assuming that the intention behind not allowing single-family detached in the SRDP is to maximize density, why not—instead of eliminating this critical type of housing that is in keeping with most neighborhood character that affordable housing is built in—allow single-family, but simply limit lot sizes to ensure that developments are still maximizing density? Or, maybe allow some % of single-family within a project (no more than 50% as an example) that would also include duplexes, triplexes, quadraplexes, etc.?

**Response:** The unit types listed on page 6 of the Application Manual will be revised to include single family units. With the exception of single family homes, all sites must contain a minimum of 4 units and a maximum of 8 units. Projects that include single family homes may contain up to 8 single family home sites that are located within a 1 mile radius. The project minimum of 8 units must still be met.

## Attachments

### HOME & NHTF Public Comments & Responses

**10. Comment:** It would be great to see SC Housing provide a prioritization in its programs for individuals/families that are homeless or exiting a CoC PSH program into a HOME rental Unit.

**Response:** Applications that designate at a minimum, 10% of the total units for disabled, homeless, or special needs tenants can receive 2 points. Please see page 21 of the application manual.

**11. Comment:** I would like to respectfully propose a change to the 2019 draft SRDP manual. Currently, as I read it subdividing from a larger parcel is not permitted if not completed prior to application. I've frequently put sites under contract that provided for a specific carve-out from a larger parcel. Subdivisions are then recorded at the time of land closing. As long as the carve out proposed in the application is 100% utilized for the development proposed in SRDP app and carve out does not change materially at closing (similar to what's done in many 9% deals), could this restriction be reconsidered?

Given the smaller nature of SRDP deals, not allowing for subdivision from larger tracts will greatly limit the sites that are available for development. Further, it will likely result in excessive land purchases (and purchase prices) as more acreage will be purchased than is necessary for the development thus increasing the funds needed for a development.

If SRDP allows proposed subdivisions as long as the acreage being subdivided is used 100% for the proposed development, I don't anticipate issues and this would align the SRDP program with the 9% which appears to work without issue.

**Response:** Subdividing from a larger parcel will be allowed if the following conditions are met.

- Subdivision of the parcel must be completed prior to closing the SC Housing loans.
- A map of the entire parcel must be provided that clearly indicates where the property lines for the subdivided project site will be located.
- The appraisal must include specific information on the value of the portion of the parcel that will be subdivided for the project.

**12. Comment:** The draft of the 2019 manual works well for us. The only thing that could possibly be better is if we could build our Genesis Homes cottage that is 720 square feet and 2BR/1BA. It is a great product for seniors and Vets.

**Response:** The per unit square foot requirements set forth in the application manual are designed to ensure the units provide functional livable spaces for

## **Attachments**

### **HOME & NHTF Public Comments & Responses**

tenants. Within its sole and absolute discretion, SC Housing may grant an exception to the minimum requirements only for developments targeting elderly, veteran, homeless, and other special need populations and only where the Authority determines the proposed units provide functional livable spaces for tenants. To be deemed a functional living space, the building plans must at a minimum demonstrate that: (1) the unit will have enough space to accommodate all essential furnishings and appliances, and (2) it will allow appropriate means of egress. To request an exception, the applicant must provide drafts of the building plans for review no later than April 15, 2019.

- 13. Comment:** Page 2 – definition of “Application Cycle”: please confirm that applications will be accepted from May 30-31 (vs. April 29-30 as currently written).

**Response:** Applications will be accepted from 8:30 a.m. to 5:00 p.m. on May 29-31, 2019.

- 14. Comment:** Page 6 – Eligible Projects/Activities/Properties: While it isn’t clear from the current language in the manual, it is our understanding after discussions with Authority staff that the intent is to limit the maximum development size to 8 units on each site. This is very restrictive, results in a higher per square foot and per unit construction costs and greatly limits a developments ability to realize operational economies of scale and provide any amenities to the residents. We suggest that the maximum number of units per site be 32, but include language in the SDRP Manual that affords a developer with the flexibility to combine multiple sites.

**Response:** The intent of the 2019 SRDP is to integrate a small number of affordable housing units (4 to 8) into neighborhoods and communities. To ensure this integration, properties located on sites adjacent to or across the street from any existing SC Housing funded project that contains 8 or more units are prohibited regardless of ownership.

- 15. Comment:** Page 7 – Ineligible Properties, #1: We respectfully request that small properties adjacent to existing funded tax credit developments be permitted. Currently, there is no program that would allow for the development of a community of less than 40 units using Authority funding (minimum development size to utilize LIHTC’s is 40 units). Furthermore, residents of a development financed using SRDP funds could benefit greatly from their proximity to an existing development. For instance, if the existing development had on-site property management, a clubhouse, swimming pool or other amenities, residents of the new SRDP funded development may be able to utilize these amenities which would otherwise not be financially feasible in a smaller development. And, since market rate tenants as well as those earning up to 80% of the AMI are permitted in SDRP developments, an opportunity to create mixed income communities can be realized by permitting SDRP developments as phases of existing tax credit developments.

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### **HOME & NHTF Public Comments & Responses**

**Response:** The intent of the 2019 SRDP is to integrate a small number of affordable housing units (4 to 8) into neighborhoods and communities. To ensure this integration, properties located on sites adjacent to or across the street from any existing SC Housing funded project that contains 8 or more units are prohibited regardless of ownership.

- 16. Comment:** Page 10 – Operating Expenses: there needs to be a provision to allow for operating expenses to be underwritten at an amount higher than \$4,000 per unit provided the applicant provides support for those higher amounts (e.g., insurance for coastal properties or owner-paid utilities, among others).

**Response:** SC Housing’s established underwriting policies, including the \$4,000 per unit amount for operating expenses, are based on historical data. SC Housing will consider documentation that the development should be underwritten using a higher amount for operating expenses for circumstances included but not limited to: required insurance premiums, owner paid utilities, or property taxes. Within its sole and absolute discretion, SC Housing will determine whether the documentation justifies a higher per unit operating expense amount and will underwrite accordingly.

- 17. Comment:** Is the SC Housing Authority using the same checklist for the 2019 application as it did in 2018? If not, please advise of pertinent changes. Specifically, we are concerned with Tabs 6/7 of the checklist: Construction and Site. In addition, are all exhibits to the 2018 checklist going to be the same for the 2019 checklist?

**Response:** The application checklist and exhibits for the 2019 application will be revised accordingly, based on the final version of the 2019 SRDP Application. Tabs 6 and 7, require the submission of preliminary development plans, site plan, M-36 construction design certification, phase I environmental assessment, appraisal, site control documentation, notice to seller, and a zoning letter. These items will be required in the 2019 application.

- 18. Comment:** What are the specifics for the audited financials required for application submission? Is a complete and formal audit only required if the applicant is a non-federal entity that expends \$750,000 or more of federal funds in a year? Or can the applicant's financial statements (i.e. income statement and balance sheet) be compiled or reviewed by a SC Board certified CPA? Please confirm the oldest date allowable for the CPA audited/compiled/reviewed financials.

**Response:** All applicants are required to submit audited financial statements. Financial statements must include a balance sheet dated on or after September 30, 2017. Details of the requirements for submitting financial statements are provided in the definition of “Financial Statements” on page 4 of the application manual. In

## **Attachments**

### **HOME & NHTF Public Comments & Responses**

addition, applicants that are non-federal entities (non-profits and governmental entities) that expended \$750,000 or more of federal funds during their fiscal year must submit a copy of their most recent audit completed in accordance with 2 CFR Part 200, subpart F.

- 19. Comment:** Page 17, #4 of the 2019 Draft Manual states, "Applicants who currently have HOME Program Income or CHDO Program Proceeds are not eligible to apply for additional funds until those funds have been expended". Is this only for SC Housing HOME/CHDO funds? We were awarded PY2018 CHDO funds through the City of North Charleston, does that exclude us?

**Response:** This requirement only applies to applicants with HOME Program Income and/or CHDO Proceeds earned from SC Housing funded projects.

- 20. Comment:** Page 6, #5 of Eligible Projects of the 2019 Draft Manual states, "Have suitable amenities". Does the Authority have a list of these suitable amenities it's referring?

**Response:** Please refer to the development design criteria and mandatory design criteria on pages 22-25.

- 21. Comment:** If an applicant chooses to use a consultant for the SRDP Application and/or project, is said consultant required to be "approved" by the Authority? If so, what is approval process and/or do you have a list of previously approved consultants?

**Response:** SC Housing does not have a list of approved consultants. Per page 13 of the application manual, consultants are limited to the administrative management of the project only and may not be involved with more than two open awards at a time. Consultants must also be in compliance with conflict of interest requirements and will be required to certify to such. Staff will review information submitted for the use of consultants during the application review process.

- 22. Comment:** Is the Market Study Needs Assessment Report requirement the same as 2018? If so, page 18, #10 of the 2019 Draft Manual mentions that an update to a Market Study Report is adequate provided the previous Report was prepared by an Authority approved provider. Is there any way to research previously submitted approved Reports to see if any match our market so we pull that and get an updated Report prepared?

**Response:** Each applicant must commission a market study needs assessment report for their specific project. All market study needs assessments must be completed by an SC Housing approved market study provider. If an applicant commissioned a report from a SC Housing approved market study provider and the

**Attachments**  
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report is older than 6 months, the applicant may have that report updated by the provider that produced the report. An applicant cannot have a report updated that was commissioned by another applicant in a previous funding round.

- 23. Comment:** The biggest hurdle for the Lowcountry will be the \$185,500 Total Development Costs maximum. Our initial calculation for an 11-unit multifamily project is around \$250,000 per unit. This higher cost is due to the shortage of available skilled labor, hurricane wind loads and seismic design requirements. We realize that it is a big gap between \$185,000 and \$250,000 but that is the reality we are facing in Charleston. We would like to propose a higher Total Development Cost allowance for the Lowcountry due to these factors.

**Response:** Should the total development cost per unit exceed the maximum cost per unit for the corresponding building type, the application must include an addendum that thoroughly explains why the project could not be completed at or below the maximum cost. This addendum should identify specific line items in which costs are well above average relative to similar buildings and/or other relevant drivers of excess development costs. The application should include appropriate documentation to justify this determination. To verify these claims, the Authority may use any third party resources it deems necessary to adequately perform a cost analysis of the application. Any costs related to the hiring or acquisition of said resources will be covered by the applicant. The Authority will reject all applications where the reasons for exceeding the maximum cost per unit are not substantiated and deemed to be valid and has sole discretion over whether any applications above maximum cost per unit receive funding.

- 24. Comment:** A project located in Charleston County will receive 4 points in the current scoring criteria. We believe a project in Charleston County should receive 8 points because there were no SRDP projects in Charleston County and because we have the highest population concentration in the state and have the higher cost of living making the need for affordable housing dire.

**Response:** The points allotted for underserved counties are determined by the amount of time that has elapsed since SC Housing funded a HOME project in that county. 8 points are allotted for counties that have not had HOME funded projects in 5 or more years; 4 points are allotted for counties that have had HOME funded projects in the last 3 years; and 2 points are allotted for counties that had HOME funded projects in the previous year. HOME funds were awarded to a project located in Charleston county in 2017, which means projects in Charleston County will be allotted 4 points in the 2019 funding round.

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**25. Comment:** The threshold requirement that we will be ineligible for a 2019 project under the current draft. 5b states that our 2016 project must be 75% complete by February 1. Can this date be extended?

**Response:** The threshold completion requirements for open HOME funded projects have been revised to the following:

- d) All 2015 and prior projects officially closed out (see “project completion” definition) on or before April 15, 2019.
- e) All 2016 projects must have 75% construction completed on or before April 15, 2019 as evidenced by an SC Housing inspection.
- f) All 2017 projects must be in compliance with the HOME Funding Agreement Exhibit A – Implementation Schedule by April 15, 2019.

**26. Comment:** Several of our development partners work in neighborhoods where single family homes are the predominant housing type and new single family homes can help to preserve the unique character of these older, often, African American neighborhoods. Please consider allowing single family development in the list of approved rental units. Perhaps you might consider a compromise, for example, for projects with 12 units or less (or some number), single family units are allowed;

**Response:** The unit types listed on page 6 of the Application Manual will be revised to include single family units. With the exception of single family homes, all sites must contain a minimum of 4 units and a maximum of 8 units. Projects that include single family homes may contain up to 8 single family home sites that are located within a 1 mile radius. The project minimum of 8 units must still be met.

**27. Comment:** Greenville is one of the counties receiving the lowest number of preference points. Please consider placing Greenville County in the 4-point or 8- point category. Most recent affordable housing study in the City of Greenville indicates a need for 2,500 affordable homes; in Greenville County that number is 9,000.

**Response:** The points allotted for underserved counties are determined by the amount of time that has elapsed since SC Housing funded a HOME project in that county. 8 points are allotted for counties that have not had HOME funded projects in 5 or more years; 4 points are allotted for counties that have had HOME funded projects in the last 3 years; and 2 points are allotted for counties that had HOME funded projects in the previous year. HOME funds were awarded to a project located in Greenville County in 2018, which means projects in Greenville County will be allotted 2 points in the 2019 funding round.

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**28. Comment:** One of our development partners, may not be able to participate in the 2019 cycle due to the proposed minimum unrestricted liquid asset requirement. Please consider adjusting this requirement to allow more partners to participate in the program.

**Response:** Organizations that receive funding must have the financial capacity to ensure that projects are completed on time and remain financially sound throughout the duration of the affordability period. If these requirements are not met, SC Housing is required to return funds to HUD. This can have a detrimental and lasting effect on the funding levels allotted to the State.

Developing housing involves risk and the use of federal funds to develop housing increases the level of risk. Organizations must have the financial capacity to absorb unforeseen costs that often arise with development activities. SC Housing's financial capacity standards, including the proposed minimum unrestricted liquid asset requirement, are designed to ensure organizations have the capacity to absorb unforeseen costs so the development remains financially sound both during construction and throughout the affordability period.

Establishing responsible standards for financial capacity is a responsibility of SC Housing as the administrator of these programs. The minimum financial capacity standards will remain unchanged.

**29. Comment:** I want to endorse the Applicant definition that presently appears in the SRDP draft:

*Applicant or Applicant Entity: Any eligible entity (public or private, for profit or nonprofit), proposing to develop affordable housing and adhere to all federal and state regulations. Also may include entities or persons of whom the Applicant Entity is comprised.*

This definition is consistent with SC Housing's awards of the 6 awards granted to LLCs in 2018. The definition also opens up the possibility of non-profits banding together under an LLC to propose development of a larger project by combining resources and development experience within the LLC entity similar to what is done with LLCs in the tax credit program all the time. It is recognized that any non-profit taking such a route will lose their legal right to claim a property tax exemption for such a development.

I must register concern that 6 of the 8 awardees in 2018 were for-profit entities, giving for-profits access to the SC Housing Trust Fund for the first time in the history of the program. As a counter to that potentially dangerous trend, I hope that SC Housing and all non-profit advocates will do all in our power to give non-profits

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every opportunity to compete head to head with any for-profit applicant in the 2019 SRDP round.

**Response:** All entity types that meet threshold requirements have the opportunity to submit competitive applications. The legislation governing the SC Housing Trust Fund has always permitted for-profits to participate in programs utilizing the fund. SC Housing has had many programs in the past which provided for-profits access to the SC Housing Trust Fund and the 2018 SRDP funding round was not the first time for-profits have participated in these programs.