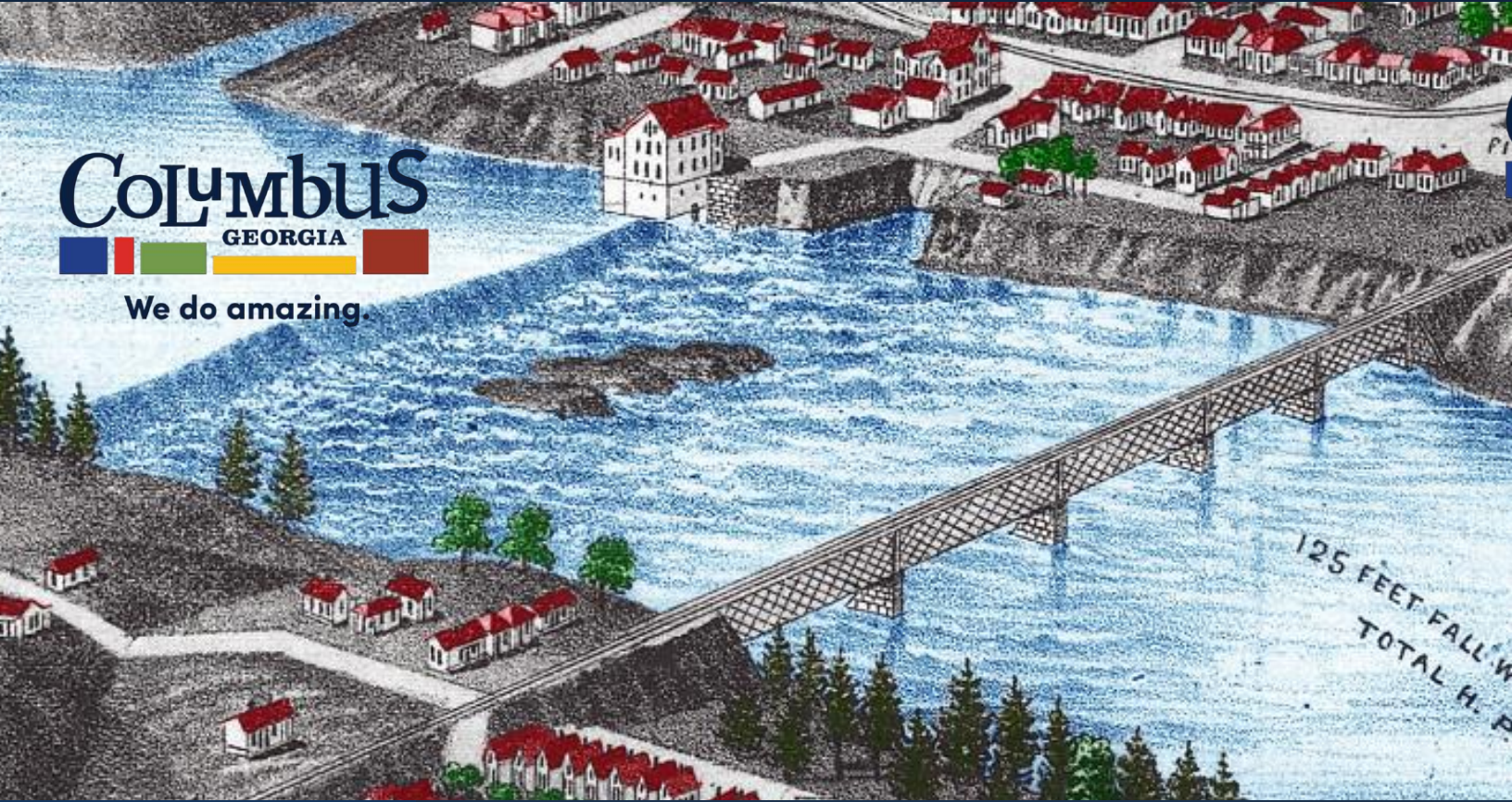




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## COLUMBUS CONSOLIDATED GOVERNMENT

# 2024 ANNUAL ACTION PLAN

MAY 2024



# Executive Summary

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

### 1. Introduction

The City of Columbus's 2024-2025 Annual Action Plan provides a comprehensive strategy for leveraging Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG), funds from the U.S. Department of Housing and Urban Development (HUD) in the 2024 program year. This plan details the anticipated completion of CDBG, HOME, and ESG projects, funding allocations, associated activities, and projected beneficiaries. Notably, the 2024 program year marks the fourth phase of implementation under Columbus's 2021-2025 Five Year Consolidated Plan, which establishes priorities and directives for HUD fund allocation over a half-decade period. During this year, Columbus is committed to addressing critical needs such as housing affordability, bolstering public services, enhancing public facilities and infrastructure, promoting fair housing practices, and optimizing program administration. By aligning with these priorities, the City aims to efficiently utilize HUD funds to foster sustainable community development and improve the quality of life for its residents.

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

Priority needs for the 2021 through 2025 planning period were developed based on citizen participation, stakeholder consultation, and analysis of the city's top housing, homeless, special needs populations, and non-housing community development needs. These priorities included:

#### *Expansion of Affordable Housing Supply*

Development of new single-family and multifamily affordable housing units for both homeownership and rental, to include elderly housing units and units produced by qualifying Community Housing Development Organizations.

#### *Housing Rehabilitation*

Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households.

### *Housing Assistance and Navigation*

Supportive programs and services to increase housing access and safety, including accessibility modifications to existing homes, down-payment assistance, tenant-based rental assistance, and lead-based paint testing.

### *Infrastructure and Public Facility Improvements*

Promote quality of life and neighborhood revitalization through improvements to current public infrastructure and facilities.

### *Public Services*

Services provided by nonprofit organizations that benefit low-income residents such as homeless, youth, disabled, elderly, and other special populations.

### *Fair Housing*

Provide services to residents and housing providers to advance fair housing.

### *COVID-19 Response*

Funding to mitigate the impacts of COVID-19 such as temporary rent, mortgage or utility assistance; financial assistance to small businesses, and other pandemic-related community support.

### *Expanding the Availability of Homeless Services and Housing*

Support agencies that provide services and housing to persons that are homeless, or at risk of homelessness.

### *Program Administration*

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations.

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

Annually, the City of Columbus assesses its advancements toward both its long-term and yearly objectives through the creation of a Consolidated Annual Performance Evaluation Report (CAPER). This report must be submitted to HUD within 90 days of the commencement of a new program year. Copies of recent CAPERs can be examined at Columbus's Community Reinvestment and Real Estate Department or accessed online at:

<https://www.columbusga.gov/communityreinvestment/Planning/CAPER>.

#### **4. Summary of citizen participation process and consultation process**

Throughout the program year, the City of Columbus engages in diverse public outreach efforts to gather input from city staff, government and non-profit agencies, affordable housing developers, local service providers, and residents.

During the preparation of this Annual Action Plan, the City held a formal public hearing on January 8, 2024, to gather input from interested stakeholders. A second Public Hearing was held on April 2, 2024, to gather feedback on the draft. This input is summarized in the Participation section of this document. Public comments on the draft Annual Action Plan were received throughout a 30-day public comment period from March 22, 2024, to April 22, 2024. A third public hearing will be held on September 11, 2024, to gather feedback on the draft Annual Action Plan that includes ESG as a new funding source. Public comments on the draft Annual Action Plan will be received throughout a 30-day public comment period from August 28, 2024, to September 27, 2024.

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

The City has not received any comments relevant to the 2024-2025 Annual Action Plan during the Public Comment Period or at the Public Hearing held on April 2, 2024.

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

Not applicable; the City has not received any comments.

#### **7. Summary**

During the 2024-2025 program year, the City of Columbus will use its CDBG, HOME, and ESG funds to address priorities identified in its 2021-2025 Five-Year Consolidated Plan. Specifically, Columbus will fund affordable housing creation, public services and public facility and infrastructure improvements, fair housing, homelessness services and housing, and program administration.

# The Process

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

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

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

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
CDBG Administrator	COLUMBUS	The Community Reinvestment Department
HOME Administrator	COLUMBUS	The Community Reinvestment Department
ESG Administrator	COLUMBUS	The Community Reinvestment Department

Table 1 – Responsible Agencies

### Narrative

Columbus falls under the U.S. Department of Housing and Urban Development’s CDBG, HOME and ESG programs as an entitlement community. The Annual Action Plan outlines projects slated for funding during the 2024 program year, spanning from July 1, 2024, to June 30, 2025.

### Consolidated Plan Public Contact Information

Robert Scott  
Director, Community Reinvestment and Real Estate  
Columbus Consolidated Government  
420 10th Street  
Columbus, GA 31901

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

### 1. Introduction

In the 2021-2025 Consolidated Plan development, Columbus involved 94 residents and stakeholders through meetings, focus groups, interviews, and a survey. The findings were outlined in the Community Participation section of the Consolidated Plan. Additionally, for the 2024 Annual Action Plan interviews were conducted with The Housing Authority of Columbus Georgia and United Way Home For Good.

Ahead of City Council approval and submission to HUD, Columbus plans a 30-day public comment period and a public hearing to gather input from residents and stakeholders on the draft Annual Action Plan.

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

Columbus collaborates with local medical and housing providers, including mental health services. MercyMed, a partner, offers counseling to low- and moderate-income households. Additionally, the city teams up with NeighborWorks, Habitat for Humanity, and the Land Bank Authority to construct new housing and refurbish existing homes in low- to moderate-income areas. Through these partnerships, Columbus fulfills a crucial function in aligning housing and mental health services for households with limited financial means.

**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.**

The City of Columbus is represented on the executive committee of the Columbus-Muscogee/Russell County Continuum of Care. Through monthly participation on the committee, city staff help decide strategies to address homelessness in the region. The City also supports several homelessness agencies, including the Southwest Georgia Housing Opportunities, Home for Good, SafeHouse, and the Open Door Community House as they provide direct services to the chronically homeless and families transitioning out of homelessness.

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

The City plays an active role with the Columbus-Muscogee/Russell County Continuum of Care, the City helps to determine the allocation of ESG funds according to the city’s 10 Year Plan to End Homelessness and the 5-

Year Consolidated Plan. During the City’s tenure on the executive committee, the CoC has also updated its Data Quality Management Plan with the HMIS Committee and has introduced system performance measures to lower error rates during data collection.

Performance standards provide a measure for ESG grantees to evaluate the effectiveness of each ESG service provider in the areas of (a) targeting those who need assistance most; (b) reducing the number of people who are homeless or in emergency shelters; (c) reducing the time people spend homeless, and (d) reducing clients’ housing barriers or housing stability risks

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

	<b>Agency/Group/Organization Name</b>	<b>Type</b>	<b>Section of the Plan Addressed</b>
1	Chattahoochee Valley Libraries	Services - Education	Market Analysis Non-homeless Special Needs
2	City of Columbus, City Council	Other – Elected Officials	Economic Development Housing Need Assessment Market Analysis Non-homeless Special Needs
3	City of Columbus, Community Reinvestment	Other – City Staff	Housing Need Assessment Market Analysis Non-homeless Special Needs
4	City of Columbus, Fire & EMS	Agency – Emergency Management	Market Analysis Non-homeless Special Needs
5	City of Columbus, Parks and Recreation	Services - Children	Market Analysis Non-homeless Special Needs
6	City of Columbus, Planning Department	Other – City Staff	Housing Need Assessment Market Analysis
7	Coldwell Banker KPDD	Housing	Market Analysis Non-homeless Special Needs
8	Columbus 2025	Business and Civic Leaders	Economic Development Market Analysis Non-homeless Special Needs

9	Columbus-Phenix City MPO	Other – Transportation	Market Analysis Non-homeless Special Needs
10	Habitat for Humanity	Services – Housing	Housing Need Assessment Market Analysis
11	Home for Good	Services – Homeless	Homeless Needs – Families with Children Homeless Needs – Unaccompanied Youth Homelessness Strategy Market Analysis
12	Homeless Resource Network	Services – Homeless	Homeless Needs – Families with Children Homeless Needs – Unaccompanied Youth Homeless Needs – Veterans Homelessness Strategy Market Analysis
13	Hope Harbour	Services – Victims of Domestic Violence	Housing Need Assessment Market Analysis
14	Housing Authority of Columbus, GA	Public Housing Authority	Public Housing Needs
15	MercyMed	Health agency	Housing Needs Assessment Market Analysis Non-Homeless Special Needs
16	NeighborWorks	Services – Housing	Housing Need Assessment Market Analysis
17	Paz Amigos	Services – Homeless	Homelessness Strategy Non-homeless Special Needs

Table 2 – Agencies, groups, organizations who participated

**Identify any agency types not consulted and provide rationale for not consulting.**

During the Consolidated Plan process, a wide variety of community stakeholders throughout the City of Columbus were consulted. A total of 61 professionals were invited to participate in a stakeholder interview. Invitations to participate were emailed to stakeholders or offered by phone. Stakeholders invited to participate represented the following fields: housing developers, real estate agents, public housing authorities, colleges and universities, homeless services, domestic violence services, school districts, non-



profit organizations, health service providers, workforce development organizations, businesses, faith-based coalitions, ethnic group organizations, mental health providers, senior services, transit authorities, elected officials, city staff, libraries, emergency management agencies, legal services providers and regional planning organizations. No agency types were excluded from outreach efforts.

**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?
10 Year Plan to End Homelessness	Columbus Consolidated Government	The 10 Year Plan aims to make homelessness “atypical, temporary, and non-recurring” through the collaboration of service providers across the city. Eliminating homelessness corresponds with the strategic plan’s public services and affordable housing goals.
2024 Annual Moving to Work Plan	Housing Authority of Columbus, GA	Goals of the 2024 Annual Moving to Work Plan Year, includes the continuation of the RAD/Section 18 Blend conversion process for the remaining 424 public housing units throughout the city. The creation of additional units for low-income households overlaps with the Strategic Plan goal to expand affordable housing supply.
Columbus 2025 Plan	Greater Columbus, GA Chamber of Commerce	The guiding principles of the Columbus 2025 Plan include “increasing prosperity, improving quality of life and reducing poverty.” Quality of life goals described in the Columbus 2025 overlap with the Strategic Plan’s goals of infrastructure and public facility improvements and expansion of affordable housing supply.
Columbus Consolidated Government 2038 Comprehensive Plan	Columbus Consolidated Government	Some of the goals highlighted in the 2038 Comprehensive Plan include expanding opportunities for walking, biking, and transit, growing and expanding businesses, and improving access to affordable, quality housing. These goals, along with others listed in the Comprehensive Plan, align with the Strategic Plan goals to

		rehab housing, expand affordable housing supply, provide public services, and improve infrastructure and public facilities.
Columbus – Muscogee County Hazard Mitigation Plan Update, 2017-2022	Columbus Consolidated Government	Goals of the city’s Hazard Mitigation Plan include reducing/eliminating community exposure to natural and manmade events and reducing loss to public and private property. These goals indirectly relate to the Strategic Plan’s overall goals of maintaining and expanding affordable housing and protecting and improving infrastructure and public facilities.
River Valley Regional Commission Comprehensive Economic Development Strategy (CEDs)	River Valley Regional Commission	The goals of the CEDs Plan include assisting the workforce of the region, improving infrastructure and improving housing stock – which align with the Strategic Plan goals of housing rehabilitation and infrastructure improvements.

Table 3 – Other local / regional / federal planning efforts

**Narrative (optional):**

N/A

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

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

The City held a workshop on January 8, 2024, to review the city’s 2021–2025 Consolidated Plan priorities. At the workshop staff described eligible activities, provided an estimate of PY 2024 funding, and explained the city’s subgrantee application process. A formal public hearing will be held on Monday, April 2, 2024, to discuss the proposed activities to be funded in the program year. A third public hearing will be held on Wednesday, September 11, 2024 to discuss the addition of ESG to the Annual Action Plan.

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**Summarize citizen participation process and how it impacted goal-setting**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/Broad community	N/A	N/A	N/A	N/A
2	Internet Outreach	Non-targeted/Broad community	N/A	N/A	N/A	N/A
3	Public Hearing	Non-targeted/Broad community	No comments received	N/A	N/A	N/A
4	Public Comment Period	Non-targeted/Broad community	No comments received	N/A	N/A	N/A

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

The City of Columbus receives annual allocations of CDBG, HOME, and ESG funds for housing construction, rehabilitation initiatives, public services, economic development, and other eligible activities. These funding sources are expected to remain available over the five-year term of the 2021-2025 Consolidated Plan. The table below shows the City’s CDBG, HOME, and ESG allocations for the 2024 program year, including prior year resources.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - federal	Acquisition Admin and Planning Economic Development Housing	\$1,701,526	\$0	\$0	\$1,701,526	\$1,701,526	Block grant from HUD to address housing, community development and economic development needs in the City.

		Public Improvements						
		Public Services						
HOME	Public - federal	Acquisition	\$914,862.28	\$0	\$0	\$914,862.28	\$914,862.28	Grant from US Department of Housing and Urban Development to address affordable housing needs in the City.
		Homebuyer down payment assistance						
		Multifamily rental new construction						
		Multifamily rental rehab						
		New construction for ownership						
		Tenant Based Rental Assistance						
ESG	Public - federal	Administration	\$145,932	\$0	\$0	\$145,932	\$145,932	Grant from US Department of Housing and Urban Development to address
		Emergency Shelter						
		Homelessness Prevention						

		Rapid Re-housing HMIS						homelessness needs in the City.
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Table 2 - 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.**

Nonprofit organizations, as subrecipients of CDBG, HOME, and ESG funds from the City, enhance their finances through foundation support and fundraising. These external resources expand the reach of City-sponsored programs. The City also encourages seeking additional public and private funds, in line with the Consolidated Plan. Federal funding enables these organizations to extend services to low to moderate-income individuals.

HUD's HOME Program requires a 25% match from non-federal fund sources. Per these requirements, the City requires organizations who receive HOME funding to provide a 25% match using non-federal funds, which is verified through a report submitted to the City on an annual basis.

HUD's ESG Program requires a 100% match. Per these requirements, the City requires organizations who receive ESG funding to provide a 100% match, which is verified through a report submitted to the City on an annual basis.

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

The City continues to identify properties in its portfolio that can be surplus and conveyed as affordable housing or other beneficial uses for the community. Additionally, the Columbus Land Bank Authority has a stated goal of providing land to be used in the creation of affordable housing and jobs for LMI citizens through residential, commercial, and industrial development.



# Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expansion of Affordable Housing Supply	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Expansion of Affordable Housing Supply	HOME: \$823,376.05	Rental units constructed: 1 housing unit  Homeowner Housing Added: 11 housing units
2	Housing Rehabilitation	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Housing Rehabilitation	CDBG: \$100,000	Homeowner Housing Rehabilitated: 10 housing units
3	Blight Removal	2024	2025	Affordable Housing	Citywide South Columbus NRSA	Blight Removal	CDBG: \$246,165	Buildings Demolished: 4 buildings

4	Infrastructure and Public Facility Improvements	2024	2025	Non-Housing Community Development	Citywide South Columbus NRSA	Infrastructure and Public Facility Improvements	CDBG: \$759,826.90	Public Facility or Infrastructure Activities other than Low/ Moderate Income Housing Benefit: 4,871 persons assisted
5	Public Services	2024	2025	Non-Housing Community Development  Homelessness  Non-Homeless Special Needs	Citywide South Columbus NRSA	Public Services	CDBG: \$255,280.90	Public service activities other than Low/ Moderate Income Housing Benefit: 10,484 persons assisted
6	Fair Housing	2024	2025	Other: Fair Housing	Citywide	Fair Housing	CDBG: \$0	Public service activities other than Low/ Moderate Income Housing Benefit: 0 persons assisted
7	COVID-19 Response	2024	2025	Other: COVID-19 Response	Citywide	COVID-19 Response	CDBG: \$0	Public service activities other than Low/ Moderate Income Housing Benefit: 0 persons assisted
8	<i>Expanding the Availability of Homeless</i>	2024	2025	Homelessness	Citywide South Columbus	Homelessness	ESG: \$134,987.10	Homeless overnight shelter: 40 persons assisted  Rapid Rehousing: 5 persons

	<i>Services and Housing</i>				NRSA			assisted Homelessness Prevention: 5 persons assisted
8	Program Administration	2024	2025	Other: Program Administration	Citywide	Program Administration	CDBG: \$340,305.20 HOME: \$91,486.23 ESG: \$10,944.90	N/A

Table 2 – Goals Summary

## Goal Descriptions

### *Goal 1: Expansion of Affordable Housing Supply*

Development of new single-family and multifamily affordable housing units for both homeownership and rental, to include elderly housing units and units produced by qualifying Community Housing Development Organizations.

### *Goal 2: Housing Rehabilitation*

Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households.

### *Goal 3: Housing Assistance and Navigation*

Supportive programs and services to increase housing access and safety, including accessibility modifications to existing homes, down-payment assistance, tenant-based rental assistance, and lead-based paint testing.

### *Goal 4: Infrastructure and Public Facility Improvements*

Promote quality of life and neighborhood revitalization through improvements to current public infrastructure and facilities.

### *Goal 5: Public Services*

Services provided by nonprofit organizations that benefit low-income residents such as homeless, youth, disabled, elderly, and other special populations.

### *Goal 6: Fair Housing*

Provide services to residents and housing providers to advance fair housing.

### *Goal 7: COVID-19 Response*

Funding to mitigate the impacts of COVID-19 such as temporary rent, mortgage or utility assistance; financial assistance to small businesses, and other pandemic-related community support.

### *Goal 8: Expanding the Availability of Homeless Services and Housing*

Support agencies that provide services and housing to persons that are homeless, or at risk of homelessness

### *Goal 9: Program Administration*

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The projects listed below represent the activities Columbus plans to undertake during the 2024 program year to address the goals of providing decent safe and affordable housing, promoting a suitable living environment, and encouraging investment in infrastructure.

### Projects

#	Project Name
1	CDBG Administration
2	Public Service Grants
3	Demolitions
4	Infrastructure and Public Facilities
5	Housing Rehabilitation
6	HOME Administration
7	Affordable Housing Development
8	Community Housing Development Organization (CHDO) Reserve
9	Community Housing Development Organization (CHDO) Operating Costs
10	ESG Administration
11	ESG

Table 3 – Project Information

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

The City's allocation priorities reflect its focus on several needs identified through data analysis, community member input, consultation with City staff and other public agencies, and reviews of relevant plans and studies, such as the 2038 Comprehensive Plan. Key priorities include funding public services, public facilities and infrastructure, and affordable housing development.

The City does not anticipate any obstacle to completing the projects it has identified for the 2024-2025 program year.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	\$340,305.20
	<b>Description</b>	CDBG Program Administration
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	N/A
	<b>Location Description</b>	Department of Community Reinvestment and Real Estate, 420 10 <sup>th</sup> Street, Columbus, GA 31901
	<b>Planned Activities</b>	Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
<b>2</b>	<b>Project Name</b>	Public Service Grants

	<b>Target Area</b>	Citywide South Columbus NRSA
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	\$255,228.90
	<b>Description</b>	Provision of broad public services covering health, education and homelessness.
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	10,484 persons assisted
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Education and career development, healthcare programming, rapid re-housing, financial and wealth building, mentoring, virtual learning programs, CoC and homeless programs, tutorial program, trade-skill training, and similar programs and services designed to benefit LMI persons
<b>3</b>	<b>Project Name</b>	Demolitions
	<b>Target Area</b>	Citywide



	<b>Goals Supported</b>	South Columbus NRSA
	<b>Needs Addressed</b>	Blight Removal
	<b>Funding</b>	\$246,165
	<b>Description</b>	Demolition of dilapidated structures
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	4 units
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Demolition
<b>4</b>	<b>Project Name</b>	Infrastructure and Public Facilities
	<b>Target Area</b>	Citywide South Columbus NRSA
	<b>Goals Supported</b>	Infrastructure and Public Facilities Improvements

	<b>Needs Addressed</b>	Infrastructure and Public Facilities Improvements
	<b>Funding</b>	\$759,825.90
	<b>Description</b>	Improvements to recreational facilities in low-to-moderate income census tracts.
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	4,871 persons assisted
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Sidewalks, Street Improvements, Public Facility Improvements
<b>5</b>	<b>Project Name</b>	Housing Rehabilitation Program
	<b>Target Area</b>	Citywide South Columbus NRSA
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	\$100,000

	<b>Description</b>	Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households. Provision of accessibility upgrades to income eligible households. Provision of lead-based paint testing to income eligible households.
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	8 household housing units
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Rehabilitation of homeowner housing to benefit extremely low-, low-, and moderate-income households. Provision of accessibility upgrades to income eligible households. Provision of lead-based paint testing to income eligible households.
6	<b>Project Name</b>	HOME Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	\$91,486.23

	<b>Description</b>  <b>Target Date</b>  <b>Estimate the number and type of persons that will benefit from the proposed activity</b>  <b>Location Description</b>  <b>Planned Activities</b>	HOME Program Administration  June 30, 2025  N/A  Department of Community Reinvestment and Real Estate, 420 10 <sup>th</sup> Street, Columbus, GA 31901  Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
7	<b>Project Name</b>  <b>Target Area</b>  <b>Goals Supported</b>  <b>Needs Addressed</b>  <b>Funding</b>	Affordable Housing Development  Citywide South Columbus NRSA  Expansion of Affordable Housing Supply  Expansion of Affordable Housing Supply  \$636,146.71 (HOME: \$636,146.71)

	<b>Description</b>	Development of affordable single-family rental and homeowner units. Down-payment assistance.
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	12 household housing units
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Development of affordable single-family rental and homeowner units. Down-payment assistance.
<b>8</b>	<b>Project Name</b>	Community Housing Development Organization (CHDO) Reserve
	<b>Target Area</b>	Citywide South Columbus NRSA
	<b>Goals Supported</b>	Expansion of Affordable Housing Supply
	<b>Needs Addressed</b>	Expansion of Affordable Housing Supply
	<b>Funding</b>	\$137,229.34
	<b>Description</b>	Acquisition and/or rehabilitation of homebuyer properties

	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	1 household housing unit
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Acquisition and/or rehabilitation of homebuyer properties
9	<b>Project Name</b>	Community Housing Development Organization (CHDO) Operating Costs
	<b>Target Area</b>	Citywide South Columbus NRSA
	<b>Goals Supported</b>	Expansion of Affordable Housing Supply
	<b>Needs Addressed</b>	Expansion of Affordable Housing Supply
	<b>Funding</b>	\$50,000
	<b>Description</b>	Salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; materials; and supplies.
	<b>Target Date</b>	June 30, 2025

	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	12
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; materials; and supplies.
<b>10</b>	<b>Project Name</b>	ESG Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	\$10,944.90
	<b>Description</b>	ESG Program Administration
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	N/A

	<b>Location Description</b>	Department of Community Reinvestment and Real Estate, 420 10 <sup>th</sup> Street, Columbus, GA 31901
	<b>Planned Activities</b>	Salaries, office supplies, advertising, travel, appraisals, printing, cost allocations, etc.
<b>11</b>	<b>Project Name</b>	ESG
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Strategies to Adress Homelessness
	<b>Needs Addressed</b>	Homelessness Strategy
	<b>Funding</b>	\$134,987.10
	<b>Description</b>	Funds will be used to support ESG eligible services in emergency shelter, homelessness prevention, rapid rehousing, and HMIS.
	<b>Target Date</b>	June 30, 2025
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Approximately 50 residents will be provided ESG eligible services in emergency shelter, rapid rehousing and/or homelessness prevention.
	<b>Location Description</b>	Citywide



**Planned Activities**

Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and HMIS.

## AP-50 Geographic Distribution – 91.220(f)

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

The City directs its CDBG, HOME, and ESG funds into two geographic areas: a Citywide target area and the South Columbus NRSA. The Citywide target area encompasses the entirety of the City of Columbus, allowing the City to direct CDBG HOME, and ESG funds to eligible activities throughout the city. Within the Citywide target area, neighborhoods where the percentage of LMI persons is 51% or higher will be prioritized for CDBG funding. The South Columbus NRSA is a smaller area within the city limits, which is home to approximately 10.8% of the city's total population. An estimated 72% of the residents in the South Columbus NRSA have low or moderate incomes. Eligible activities within both the South Columbus NRSA and Citywide target area include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

### Geographic Distribution

Target Area	Percentage of Funds
South Columbus NRSA	20%
Citywide	80%

Table 4 – Geographic Distribution

### Rationale for the priorities for allocating investments geographically

In keeping with the intent and regulations of the federal CDBG, HOME, and ESG Programs, the City of Columbus will focus its funding in neighborhoods that are predominately composed of low- and moderate-income households and that have substantial needs related to housing quality and affordability, public facilities and infrastructure, and economic development.

The system for establishing the priority for the selection of these projects in Columbus is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Prioritizing investment in the South Columbus NRSA
- Focusing on LMI areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs

- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

### **Discussion**

The South Columbus NRSA is located west of Interstate 185 roughly bound by Brown Avenue and Lumpkin Road on the west, State Spur 22 in the north, and Fort Moore in the south. The portion of the NRSA east of Interstate 185 is bound generally by Old Cusseta Road on the north and east and by Fort Moore in the south. The area is comprised primarily of residential neighborhoods and neighborhood commercial shopping centers. Neighborhoods in the NRSA include Wynnton, Willett, and Avondale Heights. According to HUD's low/moderate income data based on the 2015 ACS, nearly three quarters (72.0%) of residents in the South Columbus NRSA have low or moderate incomes. Residents with low or moderate incomes comprise a significantly larger share in the NRSA compared to the overall population of the city where roughly a third of all residents have low or moderate incomes (39.9%).

# Affordable Housing

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

### Introduction

Over the next program year, the City of Columbus plans to assist 6 homebuyers through the production of affordable for-sale units as well as rehab 5 homeowner occupied units. The City of Columbus also intends to assist 6 households through homelessness prevention activities.

One Year Goals for the Number of Households to be Supported	
Homeless	16
Non-Homeless	12
Special-Needs	0
<b>Total</b>	<b>28</b>

Table 3 – One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	12
Rehab of Existing Units	0
Acquisition of Existing Units	0
<b>Total</b>	<b>12</b>

Table 4 – One Year Goals for Affordable Housing by Support Type

### Discussion

The estimates in the tables above are derived from the anticipated PY 2024 CDBG, HOME, and ESG projects and activities.

## AP-60 Public Housing – 91.220(h)

### Introduction

Founded in 1938, the Housing Authority of Columbus, Georgia (HACG) provides publicly supported housing options for Columbus residents. The HACG also manages and maintains (but does not own) the Harris County, Ellaville, and Buena Vista Housing Authorities. In 2013, the HACG became one of 39 initial Moving To Work agencies. Having shown success with this designation, the HACG has expressed its long-term plans to become a regional Moving To Work agency.

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

During its 2024 Moving To Work Plan Year, the HACG plans to continue the RAD/Section 18 Blend conversion process for the remaining 424 public housing units throughout the city. Under this conversion process, the conventional public housing units at Warren Williams + Rivers Homes and Elizabeth F. Canty Homes will become project-based Section 8 voucher units. Once converted there will be no more conventional public housing properties in Columbus, GA.

In 2023, HACG began construction of 90 new mixed-income housing units. BTW South will contain 80 units for low-income seniors earning no more than 60% AMI, and 10 market rate units. This project will be funded utilizing 9% LIHTC, along with other funding sources such as HUD MTW funds, HOME and CDBG. As part of the RAD/Section 18 Blend conversion of Warren Williams + Rivers Homes, the property will be substantially rehabilitated through the use of 4% LIHTC/private activity bonds allocated by the Georgia Department of Community Affairs (DCA). All 182 units will be reserved for low-income families earning 60% or below AMI and project-based Section 8 voucher holders earning no more than 50% AMI. All current residents will be temporarily relocated during construction and relocated back to the site once construction is complete.

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

Public housing residents are encouraged to become involved in management with the HACG. The housing authority provides a placement for an HACG resident to serve as a commissioner on the HACG leadership team. Residents are also invited to participate in hearings regarding its Annual Moving To Work Plan and year-end report. The HACG collects and replies to resident comments on these plans. Resident comments are recorded in the final version of the annual plan.

To encourage public housing residents to participate in homeownership, the HACG offers a voluntary Family Self-Sufficiency program to help residents achieve increased financial stability over a 5-year period. The program offers career counseling, job readiness programs, and money management courses. Childcare and transportation assistance are provided.

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

Not applicable.

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

### **Introduction**

Columbus is a participant in the Columbus-Muscogee Continuum of Care, aimed at fostering a collective community commitment to eradicating homelessness. This collaborative effort involves partner agencies working together to enhance access to and utilization of their programs. Columbus remains dedicated to collaborating with the Continuum of Care and local homelessness service providers to realize the city's objectives in addressing homelessness.

The City of Columbus will utilize \$145,932 of FFY 2024 Emergency Solutions Grant entitlement funding for eligible services in emergency shelter, homelessness prevention, rapid rehousing, HMIS, and the administration of the ESG program.

### **Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including:**

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

One of the City's priorities for the 2021-2025 Consolidated Plan was to expand the availability of homeless services and housing. Activities funded under this priority may include outreach to unsheltered homeless persons. Local homelessness service providers include the United Way of the Chattahoochee Valley and The Salvation Army. These organizations offer outreach to people experiencing homelessness by providing food, clothing, and other resources.

#### *Actions to address homeless outreach needs in the 2024 program year include:*

- Supporting the Continuum of Care by providing funding for homeless outreach services.

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

Through the City's HOME-ARP funding (slated for implementation beginning July 1, 2023), Columbus will contribute \$1,167,947 toward the development of 17 family shelter units to be operated by the Columbus Salvation Army. The City will also contribute \$50,000 in HOME-ARP to Hope Harbour, the region's domestic violence emergency shelter. During PY 24, the City of Columbus may fund services provided by emergency or transitional housing providers, such as the United Way of the Chattahoochee Valley, and The Salvation Army. These providers will continue to offer emergency and transitional housing for people experiencing homelessness.

*Actions to address emergency shelter and transitional housing needs in the 2024 program year include:*

- Funding through ESG for emergency shelter, homelessness prevention, rapid rehousing, and HMIS
- Funding through HOME-ARP to support development of 17 new family shelter units
- Supporting the PATH Stability Program
- Funding supportive services for victims of domestic violence
- Conducting rapid re-housing for homeless families

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

The City of Columbus and the Columbus-Muscogee CoC support a Housing First model that prioritizes permanent housing and offers case management and other supportive services. The Housing First model supports one of the CoC's priorities, which is to increase access to affordable and permanent supportive housing.

*Actions to assist residents experiencing homelessness in making the transition to permanent housing in the 2024 program year include:*

- Supporting the PATH Stability Program
- Funding supportive services for victims of domestic violence
- Conducting rapid re-housing for homeless families

**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**

Housing and service providers in Columbus work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. At-risk populations include extremely low-income individuals and families, people discharged from institutions, and persons receiving direct assistance with housing, health, social services, education or youth needs. Local service providers such as The Salvation Army offer rent and utility assistance in the city.

*Actions to prevent homelessness in the 2024 program year include:*

- Conducting rapid re-housing for homeless families

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

### **Introduction:**

In the upcoming year, the department is gearing up to tackle the challenges posed by various public policies hindering affordable housing. These policies encompass a broad spectrum, ranging from land use controls and tax policies to zoning ordinances and building codes. Recognizing the detrimental impact of these policies, stakeholders have pinpointed the city's property tax structure in Columbus as a significant barrier to affordable housing. At present, homeowners benefit from a homestead exemption tied to the year of purchase, effectively freezing the assessed value of their properties and locking in a fixed tax payment for the duration of their ownership. This tax structure, implemented since 1983, means that property taxes only see adjustments upon sale, improvement, or overall tax rate changes. Despite efforts in 2016, when Columbus citizens voted against a proposition to alter this structure, the community remains committed to exploring avenues to address these housing affordability challenges.

### **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**

Instead of continuing to explore additional adjustments to property taxes, Columbus introduced a new proposal: a 1% increase in sales tax. This proposition received voter approval in November 2021, resulting in a raise of the local sales tax rate from 8% to 9%. The revenue generated from this Special Purpose Local Option Sales Tax (SPLOST) will be allocated towards financing a new judicial building and bolstering the city's public safety budget. This measure is expected to remain effective for a duration of 9 months, during which the community aims to address pressing infrastructure and safety needs without burdening property owners further. The decision to opt for a sales tax hike reflects a strategic shift in funding mechanisms, diversifying revenue sources and distributing the financial responsibility across a broader base of contributors. Proponents argue that this approach ensures that essential civic projects receive adequate funding while mitigating the strain on property owners who may already be grappling with housing affordability challenges. The successful passage of the SPLOST underscores the community's willingness to explore innovative solutions to meet its evolving needs and demonstrates a commitment to responsible fiscal management.

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

### **Introduction:**

This section delineates the City of Columbus's comprehensive approach to safeguarding residents' access to safe, affordable housing while also targeting underserved populations, combating poverty, establishing



robust institutional frameworks, and fostering stronger collaboration among public and private sector entities engaged in housing and community development initiatives.

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

During the Consolidated Plan planning process, residents and stakeholders voiced concerns about the significant gap in accessible, well-maintained affordable housing. Identifying key barriers, they highlighted:

High development expenses,

Necessity for subsidies to facilitate new affordable housing projects, and

Erosion of existing affordable housing due to rising rents and aging infrastructure requiring renovations.

Moreover, residents and stakeholders stressed the urgency for expanded facilities and services catering to low-income individuals and homeless populations. These services encompass job creation, vocational training, entrepreneurial support, childcare, and case management.

In response, the City of Columbus intends to allocate funding towards a diverse array of initiatives addressing these unmet needs in housing, services, and infrastructure. The goal is to bridge the gap in affordable housing while simultaneously bolstering support systems for vulnerable populations, thereby enhancing community resilience and fostering sustainable growth.

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

The City does not have any plans to refinance existing debt secured by multifamily housing and therefore does not have any refinancing guidelines for that activity.

To bolster and diversify the existing stock of affordable housing, the City aims to forge partnerships with non-profit housing entities and private firms, with the primary objective of augmenting the availability of affordable housing options. Collaborative efforts may involve engaging LIHTC (Low-Income Housing Tax Credit) developers or other entities contemplating housing ventures within the city limits. Additionally, the City will explore avenues for securing funding or grants that can be leveraged to inject fresh capital into affordable housing initiatives or programs.

Building upon its commitment to enhancing housing affordability, the City will sustain momentum through various ongoing initiatives. These include the homebuyer down payment assistance program and Homeowner occupied rehabilitation, which facilitates crucial repairs and installations encompassing heating and air conditioning systems, roofing, flooring, plumbing, electrical updates and repairs, windows, and exterior doors.

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

In the past decade, HUD has prioritized the mitigation of lead-based paint hazards, an effort echoed by numerous jurisdictions nationwide. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992, an amendment to the Lead-Based Paint Poisoning Prevention Act of 1971, regulates lead-based paint in federally funded housing. These statutes, alongside subsequent regulations outlined in the U.S. Department of Housing and Urban Development's guidelines (24 CFR, part 35), safeguard young children from lead exposure in housing receiving financial assistance or undergoing federal sale.

In the event of property rehabilitation projects, the City of Columbus will conduct assessments to determine the presence of lead-based paint. If identified, the City will adhere to the provisions outlined in the Residential Lead-Based Paint Hazard Reduction Act of 1992. Demonstrating its dedication to this cause, the City of Columbus pledges to test and mitigate lead in all pre-1978 housing units benefiting from federal grant funds across its various housing programs.

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

Columbus's strategy to combat poverty centers on elevating the economic status of low-income households, ensuring they surpass the poverty threshold. Presently, educational and employment initiatives targeting poverty reduction are administered by entities like the Lower Chattahoochee Workforce Development Board, WorkSource Georgia, Columbus State University, Columbus Technical College, Goodwill, Better Work, and local nonprofit organizations.

In a collaborative effort with community stakeholders, the City secured a Vice President of Poverty Reduction with the United Way of the Chattahoochee Valley. This individual will cultivate strategic partnerships across the region and craft a ten-year actionable plan to reduce poverty in Columbus and the broader Chattahoochee Valley area, incorporating input from various stakeholders. Spearheading this endeavor is the Chattahoochee Valley Poverty Reduction Coalition, which secured \$1 million in start-up funding from American Rescue Plan to sustain the position and its associated initiatives for an initial three-year period, while concurrently establishing permanent funding streams.

Economic development strategies at both municipal and regional levels are intricately linked to poverty alleviation and workforce enhancement. The River Valley Regional Commission Comprehensive Economic Development Strategy, updated in 2022, prioritizes equipping the local workforce with the requisite knowledge, skills, and competencies for 21st-century employment. Key objectives under this mandate involve maintaining dialogue with local employers to ensure workforce training programs align with industry needs, facilitating educational initiatives within the local school systems, aiding military-to-civilian job transitions, and promoting apprenticeships and internships for youth.

Similarly, the Columbus 2025 plan, part of the Regional Prosperity Initiative, underscores the importance of nurturing a skilled and educated workforce to bolster regional competitiveness. Objectives within this

framework encompass establishing a comprehensive cradle-to-career partnership to synchronize education, training, business, and social services, expanding access to high-quality early childhood education and family support services, fostering awareness of educational and career pathways from an early age, enhancing mentoring programs for at-risk K-12 students, launching adult education campaigns, forging collaborations between businesses and educational institutions to tailor programs to target industry needs, and developing retention programs for military personnel transitioning out of service.

Moreover, several nonprofit organizations within Columbus provide emergency assistance to individuals in need. These multifaceted efforts highlight the city's commitment to tackling poverty through a holistic approach, combining educational, employment, and social support initiatives to uplift vulnerable communities and foster inclusive economic growth.

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

In August 2023, the Community Reinvestment Department held a mandatory training for all CDBG Public Service sub-recipients. The training covered the department's new CDBG-PS policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, and monitoring. The department has also updated its HOME policies and internal financial management and procurement policies. The department will intensify its sub-recipient monitoring in PY 24, including on-site monitoring for the highest risk sub-recipients. Finally, starting in PY 24, the department will implement its "first in, first ready, first out" process for CDBG Public Facilities. Using this process, the department will accept public facilities applications on a rolling basis. Currently, many projects are facing significant material and construction delays, which makes it difficult to select and implement CDBG-PF projects within the Action Plan year. The alternative process will allow us to plan for construction projects over longer and more realistic timeframes.

In the 2023 program year, the City worked within existing partners and coalitions, such as the Continuum of Care, to meet homeless service needs. In addition, the Community Reinvestment Department held mandatory training for all potential CDBG Public Facilities sub-recipients. The training covered the department's new CDBG-PF policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, procurement, Davis-Bacon and monitoring. In the 2024 program year, The Community Reinvestment Department will work closely with state and local agencies, nonprofit organizations, and other service providers to coordinate delivery of services to city residents. Columbus Consolidated Government will also continue to consult with various housing, homelessness, social service, elderly and disability resource agencies to gather data and identify service gaps and utilize ESG funding for eligible services. In addition, the Community Reinvestment Department will hold a mandatory training for all potential HOME nonprofit and For-profit developers, as well as those administering our Sweet Home Columbus down payment program, to bring rigidity and specificity to affordable housing development. The training will cover the department's new HOME Affordable Housing

Development and Accessibility policy manual, and included such topics as client eligibility, eligible activities, reimbursements, beneficiary information, monthly reports, contractor procurement, BABA, and monitoring.

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

The City of Columbus will maintain its active involvement in the Columbus–Muscogee Continuum of Care, a collaborative initiative uniting nonprofit, governmental, and business leaders in a collective effort to address homelessness. This partnership encompasses a diverse membership, including providers of emergency, transitional, and permanent housing, alongside nonprofit social service organizations and government agencies.

Furthermore, the city hosts an annual affordable housing workshop designed to convene stakeholders with a vested interest in enhancing housing accessibility for populations earning below 80% of the area median income. The workshop serves as a platform for fostering dialogue and collaboration among participants, aiming to bolster both the availability and accessibility of affordable housing options. Additionally, it aims to facilitate the provision of comprehensive support services tailored to the needs of low-income households.

# Program Specific Requirements

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

### Introduction:

This section describes program specific requirements for CDBG, HOME, and ESG funds. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income over the 2024 Program Year period is 70.00%.

### Community Development Block Grant Program (CDBG)

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

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

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

### Other CDBG Requirements

1. The amount of urgent need activities	\$0
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2a. 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.	70%
2b. Specify the years covered that include this Annual Action Plan.	2024 Program Year

**HOME Investment Partnership Program (HOME)**

**Reference 24 CFR 91.220(I)(2)**

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

Other forms of investment being used in the HOME Program include Low Income Housing Tax Credit (LIHTC) and funding appropriated through the American Rescue Plan act of 2021. No other forms of investment are contemplated for the use in the HOME Program beyond those identified in 92.205. outside of those listed above.

**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:**

The City’s Home Program Resale/Recapture Provisions are included in the Grantee Unique Appendices attached to this plan document.

**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:**

The City’s Home Program Resale/Recapture Provisions are included in the Grantee Unique Appendices attached to this plan document.

**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:**

The City does not have any plans to refinance existing debt secured by multifamily housing and therefore does not have any refinancing guidelines for that activity.

## Emergency Solutions Grant (ESG)

### Reference 91.220(I)(4)

- 1. Include written standards for providing ESG assistance (may include as attachment) the City of Columbus will focus on the two eligible populations that can be assisted with funds: persons at risk of becoming homeless and persons who are literally homeless. While these are the targeted populations, it is important to give assistance to eligible participants who are in the most need of funds.**

#### **Eligibility for Assistance**

Each individual or family who is receiving assistance must first meet with case manager or intake personnel who can determine the appropriate type of assistance to meet their needs. The household must be at or below 30% of Area Median Income (AMI). Assets are counted for determining AMI eligibility. AMI is prospective and only counts income generated at that particular time. The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing

#### **Homelessness Prevention Assistance**

Although there are minimum requirements, HUD encourages grantees and subrecipients to target prevention assistance to individuals and families at the greatest risk of becoming homeless. The target population for the City will have the following risk factors:

- Sudden and significant loss of income
- Eviction within two weeks from a private dwelling
- Severe house cost burden (greater than 50% of income for housing costs)
- Pending rental housing foreclosure
- Credit problems that preclude obtaining housing

#### **Rapid Re-Housing Assistance**

Rapid re-housing assistance is available for persons who are homeless according to HUD's definition of homeless. The target population for the City's rapid re-housing program will have the following risk factors:

#### **Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:**

- Has a primary nighttime residence that is a public or private place not meant for human habitation;

- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs)
- Is exiting an institution where an individual has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

The purpose of these funds is to assist eligible program participants to move into permanent housing and achieve housing stability. Therefore, the City's subrecipients providing assistance will utilize a process to assess the level of service needed for all potential program participants, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG.

### **Coordination**

The City will coordinate with the Continuum of Care (CoC) by attending and participating in the bi-monthly Continuum of Care meetings and monthly steering committee for the CoC. The Continuum includes several emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, mainstream service, and housing providers. In addition to bi-monthly meetings, there are several committees that also meet on a monthly basis to coordinate and establish policies. These committees include the Emergency Action Team and the Emergency Housing Team meetings.

### **Determining and Prioritizing Eligibility**

The City and its providers within the Continuum recognize that individuals and households must be prioritized to ensure that funding is distributed to best serve the needs of those who are homeless or at-risk of becoming homeless.

Subrecipients will perform intake and evaluate each individual and household on a case-by-case basis. They recognize that each case is different, and that the demographics throughout the county are so different so as to not be able approach potential clients with a "one size fits all strategy." To best prioritize those who are homeless or at risk of becoming homeless for rapid re-housing or homeless prevention funds, those who are at-risk of becoming homeless will need to show that they will become homeless if they do not receive ESG Homeless Prevention funds, and they must have also suffered an economic hardship to become at risk of losing their home.

Subrecipients may choose to prioritize homeless individuals and households who have been involved with their particular program for Rapid Re-housing assistance, although each individual and household will be evaluated before being able to receive funding.



In addition to the household income being below 30% AMI and the household currently experiencing homelessness or being at imminent risk of becoming homeless, there must be documented evidence in the client files that determine:

- There is a lack of financial resources.
- There are no other housing options.
- There are no support networks.

### **Client share of rent and utilities costs**

When a provider determines that a household is a priority for either Homeless Prevention or Rapid Re-housing rental assistance, they will be eligible to receive up to 100% rental assistance for no more than the full amount of the rent, as stated on the lease.

### **Short Term and Medium-Term Rental Assistance Duration**

The City will require short-term and medium-term rental assistance to allow individuals and families to remain in their existing rental units or to help them obtain and remain in rental units they select. A lease must be in place in the program participants name for them to receive assistance.

Short-term rental assistance can only be used for three (3) months while medium-term rental assistance ranges from four (4) to 24 months. No program participant may receive more than 24 months of assistance under ESG, and each program participant must be evaluated every three (3) months to determine the amount of assistance needed.

Rental assistance may also be used to pay up to six (6) months of rental arrears for eligible program participants; however, the six (6) months count towards the 24 month total. The rental assistance paid cannot exceed the actual rental cost, which must be in Compliance with HUD's standard of "rent reasonableness." This means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program. Cost types are the categories of eligible HPRP financial assistance: rent from the client portion or the subsidy; security deposits, utility deposits, utility payments, moving cost assistance, and hotel/motel vouchers.

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

United Way Home for Good Continuum of Care has not formally developed a coordinated assessment system; however, the City – in conjunction with the Balance of State CoC – and the Georgia Department of Community Affairs are utilizing the same ESG forms as a first step towards developing an outreach and intake system.

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

The City of Columbus Community Reinvestment Department publishes a notification of funding availability in the Ledger Enquirer, the local newspaper, to announce the availability of program funds. Application notices are also emailed to the Community Reinvestment Department's wide network of stakeholders and posted on the Community Reinvestment Department's website for organizations to download and apply for funding. These applications are then reviewed by an application rating committee for conformance with the program requirements, qualifications of applicants, availability of matching funds, and other factors. The applications committee makes recommendations to the Columbus City Council for final approval of funding allocations.

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

The City of Columbus Community Reinvestment Department requires subrecipient organizations to include homeless or formerly homeless individuals or other equivalent policymaking entity. Non-profit organizations recommended for PY2024 funding have procedures in place for homeless or formerly homeless persons to be involved with the program design and implementation.

**5. Describe performance standards for evaluating ESG.**

Performance standards provide a measure for the City to evaluate the effectiveness of each ESG service provider in the areas of: (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and, (d) Reducing clients' housing barriers or housing stability risks. A complete listing of ESG written standards can be found attached as an appendix.

**The City of Columbus will evaluate each ESG service provider’s performance based on the following standards:**

1. Subrecipients will develop and adhere to priorities for service delivery by need.
2. Subrecipients will assist clients in rapid movement to permanent housing from shelters or from the street.
3. Subrecipients will ensure that clients have easy access to services
4. Subrecipients will provide comprehensive case management to address a spectrum of needs for each client.