

CHAPTER 5: 2013 ACTION PLAN

The 2013 Action Plan is the first year of the 2013-2017 Consolidated Plan. The Action Plan addresses the proposed programs, projects, and activities that will be undertaken in 2013 with the resources anticipated to be available in the proposed budget. Funding sources include the Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME), as well as City General Fund support for public (human) service activities.

The 2013 Action Plan assumes that federal resources will be consistent with 2012 appropriations. With 2012 being a presidential election year, most people anticipate that funding for CDBG and HOME programs might not be known until well after the election. If significant changes in resources take place, then an amendment to the Action Plan would be required.

The primary program activities included in the 2013 Action Plan are as follows:

Homebuyer Assistance -- Approximately 9% of the federal funding is set aside for assisting homebuyers through Kulshan Community Land Trust. The City will work with Kulshan CLT to market housing opportunities to minorities disproportionately represented in home ownership, and towards neighborhoods with high rental concentrations. The City will also look at other ways to provide incentives to achieve these targeted needs over the next year.

Housing Development -- Approximately 43% of the federal funding is dedicated to housing development and assistance. Tenant-based rental assistance is targeted towards those households earning less than 30% AMI and threatened with becoming homeless. Two multifamily housing rehabilitation projects (Pacific Rim and Orleans Place) that will not be completed in 2012 are continued into 2013 for completion. A downtown housing project for Catholic Housing Services in the 2012 Action Plan is continued forward into 2013.

Funding is allocated to a housing demonstration project in a location to be determined. The action would solicit proposals from for-profit developers that could partner with others to develop a project that implements the City's Infill Toolkit.

Public Facilities and Improvements -- Approximately 8% of the funding would be allocated to assisting nonprofit agencies that provide services to low income persons with improvements to their facilities. The three agencies include the Bellingham Food Bank, Interfaith Health Center and Domestic Violence and Sexual Assault Services of Whatcom County.

Public (human) Services -- 15% of the CDBG funding (maximum) is allocated to public (human) service activities. The City is also allocating additional funds toward this activity. Applications for these funds were submitted July 31st and preliminary selections will take place in September.

EXPECTED RESOURCES

Source of Funds	Use of Funds	Expected Amount Available	Expected Amount Available Remainder of Con Plan	Narrative Description
CDBG	Acquisition	Annual Allocation:	\$ 711,300	Funds used for priority needs, including preservation of housing stock, lead-based paint, homebuyer assistance, public improvements, public services and administration and planning.
	Admin and Planning	Program Income:	\$ 175,000	
	Economic Development	Prior Year	\$ 265,700	
	Housing	Resources:		
	Public Improvements	Total:	\$ 1,152,000	
	Public Services			
HOME	Acquisition	Annual Allocation:	\$ 516,847	Funds used for homebuyer assistance, housing development (including CHDOs) and administration
	Homebuyer assistance	Program Income:	\$ 76,365	
	Homeowner rehab	Prior Year	\$ 453,300	
	Multifamily rental new construction	Resources:		
	Multifamily rental rehab	Total:	\$ 1,046,512	
	New construction for ownership			
	TBRA			
City	Public Services	Annual Allocation:	\$ 175,835	These funds are used to support public (human) service needs in the City, supplementing CDBG assistance, and support for the Homeless Service Center.
		Program Income:	\$ -	
		Prior Year	\$ 703,340	
		Resources:		
		Total:	\$ 175,835	

LEVERAGING FEDERAL FUNDS/MATCHING REQUIREMENTS

Federal funds the City receives through the Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) are used to leverage other federal, state and local resources to meet housing and community development needs.

In 2011, for every dollar of federal funds the City allocated, another \$3.18 in non-federal funds were leveraged. Public (human) service grants leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical services to our community.

City funding for most housing projects often includes other funds to complete a project. Nonprofit housing developers have been successful in obtaining Washington State Housing Trust Fund allocations and Low Income Housing Tax Credit investments. The City's funding has been successful at leveraging significant non-federal sources.

ANNUAL GOALS AND OBJECTIVES

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Increase supply of affordable rental housing	2013	2017	Affordable Housing		Increase supply of affordable housing	HOME: \$144,690	Rental units constructed: 4 Household Housing Unit
Increase supply of affordable family housing	2013	2017	Affordable Housing		Increase supply of affordable housing		
Increase supply of affordable owner-occupied housing	2013	2017	Affordable Housing		Increase supply of affordable housing	HOME: \$200,000 CHDO: \$77,527	Direct Financial Assistance to Homebuyers 8 Households Assisted
Maintain Housing Stock	2013	2017	Affordable Housing		Increase supply of affordable housing	CDBG: \$653,057 HOME: \$100,000	Homeowner Housing Rehabilitated: 25 Household Housing Unit Rental units rehabilitated Household: 178 Housing Unit
Increase supply of permanent supportive housing	2013	2017	Affordable Housing			HOME: \$315,000	Rental units constructed: 42 Household Housing Unit
Provide Supportive Services to Homeless	2013	2017	Homeless				
Support Rapid Rehousing of Homeless Persons and Families	2013	2017	Homeless		Homelessness	HOME: \$150,000	Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted
Maintain Inventory of Interim Housing	2013	2017	Homeless				
Increase Public Housing Resident Involvement	2013	2017	Public Housing				
Help fill gap in basic needs (services) to low-income persons and households	2013	2017	Non-Housing Community Development	Sunnyland	Healthy Children and Families	CDBG: \$85,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
Support efforts to reduce	2013	2017	Non-Homeless				

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
poverty			Special Needs				
Support equitable investment of public facilities and improvements	2013	2017	Non-Homeless Special Needs	CBD	Healthy Children and Families/Assist Special Needs Population	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 460 Persons Assisted

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)(2)

Income:	Estimated number of families whom will be provided affordable housing	
	Rental Housing:	Ownership Housing:
Extremely low-income (<30% AMI)	122	0
Low-income (>30% and <50% AMI)	68	24
Moderate-income (>50% and <80% AMI)	16	52

PROJECT SUMMARY

ACTIVITY SUMMARY

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
City Housing Rehabilitation Program	Citywide with targeted priority to support tenure diversity and low-income neighborhoods	Maintain Housing Stock	Preservation	\$ 453,057
Habitat for Humanity Housing Rehabilitation Program	Birchwood Neighborhood	Maintain Housing Stock	Preservation	\$ 50,000
Kulshan Homebuyer Program	Citywide with targeted priority to support tenure diversity Birchwood Neighborhood	Increase supply of affordable owner-occupied housing	Increase Affordable Housing Supply	\$ 277,527
Multi-family Housing Rehabilitation	Pacific Rim and Orleans Place (Bellingham Housing Authority); Dorothy Place (Opportunity Council)	Maintain Housing Stock	Preservation	\$ 250,000
Food Bank Expansion	Sunnyland	Help fill gap in basic needs (services) to low-income persons and households	Healthy Children and Families	\$ 85,000
Domestic Violence and Sexual Assault Services -- accessibility improvements	Central Business District	Support equitable investment of public facilities and improvements	Assist Special Needs Population	\$ 30,000
Interfaith Health Clinic -- Facility Improvements	Central Business District	Support equitable investment of public facilities and improvements	Healthy Children and Families	\$ 70,000
Public (Human) Service Activities (reserved)	Citywide	Reserved	Reserved	\$ 134,445 (CDBG) \$ 175,835 (City)
Cornwall Housing Project (Catholic Housing Services)	Central Business District	Increase supply of permanent supportive housing	Increase Affordable Housing Supply	\$ 315,000
Tenant-Based Rental Assistance (Opportunity Council)	Citywide (choice vouchers)	Support Rapid Rehousing of Homeless Persons and Families	Homeless	\$ 150,000
Housing Infill Demonstration Project	TBD	Increase supply of affordable rental housing	Increase Affordable Housing Supply	\$ 144,690
Planning and Administration	n/a	n/a	n/a	\$ 236,463
			TOTAL:	\$ 2,396,912

HUMAN SERVICE ACTIVITIES

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
Homeless Service Center	n/a	Provide Supportive Services to Homeless	Homelessness Coordination and Delivery of Services	\$ 45,835
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
Reserved for CDAB				\$
			TOTAL:	\$

#	Project Name

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

Allocation priorities are based on the needs and market analysis identified in the Consolidated Plan, along with requests from housing and nonprofit agencies for funding assistance.

The 2013 Action Plan includes funding to address facility improvements at agencies that provide services, including basic needs, health care, and services for victims of domestic violence. This funding helps meet the need to provide these essential services in adequate facilities.

The public (human) service funding was based on priorities set forth in a Request for Proposals. The funding distribution targets were 40% toward housing programs, 19% toward physical/mental health, 19% toward basic needs, 17% toward affordable child care, and 5% toward supportive services and job training.

GEOGRAPHIC DISTRIBUTION

HUD encourages the City to identify designated areas where targeted revitalization efforts are carried out through multiple activities in a concentrated and coordinated manner. Geographic priorities in the city include:

- ✓ Historic neighborhoods -- Bellingham is blessed with significant historic resources and neighborhoods. Many of the historic properties that have been surveyed in the city are in neighborhoods where median sale price of single family homes have increased in recent years. Current owners, if low-income, might find it increasingly difficult to maintain their home.
- ✓ Neighborhood Diversity -- 54% of Bellingham's housing stock is renter-occupied, but several neighborhoods have a much higher (or lower) percentage of rental housing. Some neighborhoods have disproportionate racial and ethnic populations as well.
- ✓ Areas with Mobility Access -- People living within Bellingham are more likely to walk, take public transportation or bike to work than those that live outside the city. Public transportation serves the high density residential areas of the city; employment areas are also served, but non-retail employment areas (e.g. Irongate) are served on a less-frequent basis. The City is preparing a Pedestrian Master Plan that prioritizes projects to address equity issues based on household tenure and income.

Neighborhoods that include these patterns include:

- Meridian. This neighborhood has the highest concentration of minority populations in the City, along with the highest rental concentration. The neighborhood is located along major transportation routes, including Interstate 5 and the Guide Meridian. There are limited public parks within the neighborhood.
- Roosevelt. This neighborhood has a high concentration of rentals and minority population. The neighborhood does include City parks and a Boys and Girls Club, but lacks other public facilities or meeting places, like a neighborhood grocery store.
- Central Business District. The CBD includes significant historic resources, a mix of incomes and access to public facilities and services.
- Columbia, Happy Valley, Lettered Streets, Sunnyland and York. All five of these neighborhoods have seen the median sales price of single family homes more than double in the past ten years, higher than the city-wide average increase during this time period. These neighborhoods have historically had home sales below city-median prices, but are becoming less affordable to low-income and first-time homebuyers.

TARGET AREA/% OF FUNDS

Based on the geographic priorities, the City is directing housing rehabilitation and homeownership funding to targeted neighborhoods. These are goals that will be sought through active marketing efforts.

Public improvements are planned in targeted low-income neighborhoods where services are most accessible to low-income persons.

Target Area	% of Funds
Low-Income Neighborhoods (>51%)	37%
Central Business District	23%
Other	40%

AFFORDABLE HOUSING

The City will work towards achieving several affordable housing goals during the year.

- The City will continue to provide funding towards public services that support housing, particularly for homeless, special needs and medically fragile people.
- The City will provide tenant-based rental assistance for those households at the risk of becoming homeless.
- The City will provide funding to rehabilitate existing multi-family housing units (Pacific Rim and Orleans Place)
- The City will provide funding to rehabilitate existing owner-occupied housing, including a new program with Habitat for Humanity.
- The City will provide funding to Catholic Housing Services for a rental housing project in downtown.
- The City has reserved funding for the Opportunity Council as a Community Housing Development Organization (CHDO).
- The City has reserved funding for development of additional housing capacity for a project to be determined. An amendment of the Action Plan would be required.

ONE YEAR GOALS

Number of Households to be Supported³⁶

Homeless:	
Non-Homeless:	
Special Needs:	
Total:	

Number of Households Supported through:

Rental Assistance:	20
The Production of New Units:	45
Rehab of Existing Units:	203
Acquisition of Existing Units:	7
Total:	275

PUBLIC HOUSING

Actions planned to address the needs to public housing:

- The City will continue to work with the Bellingham Housing Authority to address their needs.

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

1. The City will continue to support the Bellingham Housing Authority's program to involve residents in the management of the Housing Authority and their property.

³⁶ This table will be completed after review of the public (human) service applications.

2. The City will provide information to public housing residents about homeownership opportunities sponsored by the City.
3. The City will provide Fair Housing information to public housing residents.
4. The City will encourage the Housing Authority to provide information about homeownership opportunities to public housing residents.

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

n/a

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES

The Homeless Service Center (HSC), a program of the Opportunity Council (OC), operates a centralized and coordinating homeless housing service center that serves the homeless population in the City of Bellingham. This Center serves as a hub for all homeless housing related activity in the community, including the coordination of homeless housing service providers and the management of the local homeless management information system (HMIS) by operating a single-point of entry.

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.

People who are homeless or at risk of becoming homeless enter the housing system and are assigned case management from an array of partnering, non-profit housing agencies. Housing counseling and advocacy become a significant part of the case management support provided. More general counseling and advocacy services are also available to low-income people at the Community Resource Center of the OC which offers information and referral services to help people seeking a variety of services in addition to housing services.

Bellingham has a variety of outreach services targeting the homeless population: Hope House, a volunteer team that operates out of a program of Catholic Community Services, Homeless Disability Benefits Advocacy Program, Drop-In Centers run by Lighthouse Mission and Whatcom Counseling and Psychiatric Clinic (WCPC), a WCPC Mobile Outreach Team, a PATH Program worker, SeaMar Homeless Outreach, and several meal programs.

SeaMar Community Health Clinic provides on-site medical care services at the Lighthouse Mission Drop In Center one day per week. The Project Homeless Connect event brings in mobile dental clinics once a year for homeless and low-income people to receive free dental services. Seasonal mobile vaccine clinics are services provided by the Health Dept. for low-income residents. Homeless people are targeted through their provider networks and at the Lighthouse Mission Drop In Center.

Addressing the emergency shelter and transitional housing needs of homeless persons:

The City's strategy on homelessness encourages rapid rehousing of those that are homeless and targeted prevention for those that are at risk of becoming homeless.

The City supports existing emergency shelter and transitional housing in the community through the city's public (human) service grant program.

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 HSC administers rental subsidies (local funds) to homeless and at-risk households and matches the subsidy with case management support provided by one of several partnering, nonprofit housing agencies. Families with children, youth, and veteran households are among the populations that are supported by rental subsidies and case management. Additionally, the HSC administers Supportive Housing Program (SHP) subsidies to people who are chronically homeless. HSC also operates the Rapid Rehousing Demonstration program for families with moderate housing barriers who are homeless, including survivors of domestic violence. OC and HSC also administer the Supportive Services for Veteran Families program that offers temporary financial assistance and case management to homeless and at-risk veteran households.

The following are just some of the programs and employment and job training programs that serve people who are homeless in Bellingham: WorkSource One-Stop Center, OC employment specialist, Lake Whatcom Treatment Center and Whatcom Counseling and Psychiatric Center employment specialists, Community Jobs, Northwest Youth Services jobs training, and Department of Vocational Rehabilitation.

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 HSC helps to coordinate housing placements for people re-entering the community from institutions, and implements a housing program for people on State disability assistance.

Pioneer Human Services operates a 37-unit apartment (City Gate) that includes units for offenders re-entering from jail, as well as units for veterans.

Discussion:

Bellingham's plans to end homelessness are models for the state and nation. In the past several years, with additional funding, the community has shown that it can have a significant effect on the number of homeless people in our community. Targeted outreach to veterans from Whatcom County, the Homeless Service Center and others has led to dramatic reductions in veterans that are homeless. The most significant barrier to accomplishing the goal to end homelessness in the community is now funding.

BARRIERS TO AFFORDABLE HOUSING

In 2007, Whatcom County and the City of Bellingham appointed sixteen community members to a Countywide Housing Affordability Task Force (CHAT). The purpose of CHAT was to review and develop policies and strategies to meet countywide affordable housing goals. Three of CHAT's six goals addressed strategies to remove barriers to affordable housing:

- 2) Create a housing trust fund
- 3) Strive to reduce land and building costs.
- 4) Provide incentives for the creation of affordable housing.

The primary strategies that CHAT recommended to implement these goals are:

- Create an affordable housing investment fund
- Adopt measures that reduce land costs
- Adopt measures that reduce labor and material costs
- Adopt measures that reduce infrastructure development costs
- Adopt affordable housing incentives

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

- The City intends to review the CHAT recommendations on land use and other limitations or policies that affect affordable housing supply in the City. Some of this effort will be integrated with other city planning efforts that encourage infill opportunities within the City.
- Other fees and charges that affect affordability will also be reviewed, including consideration of reducing impact fees for low-income housing.

OTHER ACTIONS

The City will undertake, or support the efforts of other agencies, that meet the needs of low-income persons and households.

Actions to Address Obstacles to Meeting Underserved Needs:

- The City will work with other funding agencies, including Whatcom County, United Way of Whatcom County and private foundations, to coordinate funding to more effectively meet the needs of the community.
- The City will seek opportunities to increase funding available for affordable housing.
- The City will work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.

Actions to Foster and Maintain Affordable Housing:

- Most of the city's affordable housing inventory is owned and managed by non-profit housing providers. There is very little risk that projects will be lost from the affordable housing inventory. Regardless, the City will work with these providers when time comes to renew tax credits to ensure continued viability of the housing.

- The City will work with owners of private multifamily rental units to identify obstacles and opportunities for City assistance in rehabilitation of the multifamily units. This will address the aging housing stock that is in need of preservation.

Actions to Reduce Lead-based Paint Hazards:

- All housing rehabilitation efforts on homes that were built before 1978 will include lead-based paint hazard evaluations. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.
- The City will continue to provide educational information about the hazards of lead-based paint. Information is available on the City's web site, and a class targeted to parents of young children will be provided at an elementary school.

Actions to Reduce the Number of Poverty-level Families:

- The City will support the efforts of non-profit agencies that are working to reduce the number of poverty-level families. These efforts include the Whatcom Prosperity Project and the Asset Building Coalition sponsored by the Opportunity Council, the Prosperity Initiative of the Whatcom Community Foundation, and the work of United Way of Whatcom County.
- The City will support the efforts of other public agencies that work to reduce the number of people in poverty. Whatcom County and Washington State's WorkFirst Program work towards this end, as well as WorkSource.

Actions to Develop Institutional Structure:

- The City will work with public and nonprofit funding agencies to identify ways to coordinate and improve the effectiveness of the institutional system of funding housing and low-income community development needs in the community.
- The City will continue to work with all housing and human service agencies to coordinate and improve communications. The Community Development Advisory Board will be one mechanism for hearing other program and institutional issues, and addressing ways to improve the system in Bellingham.

Actions to Enhance Coordination Between Public and Private Housing and Social Service Agencies:

- Continue to support the efforts of the Homeless Steering Committee which coordinates the actions of housing and social service agencies in the community.

PROGRAM SPECIFIC REQUIREMENTS

The 2012 Action Plan continues many of the proven programs that the City has implemented for many years, including rehabilitation of homeowner units, homebuyer assistance, public (human) services, tenant-based rental assistance and housing development.

The 2012 Action Plan includes funding for public facilities and improvements to three nonprofit agencies that provide basic needs within the community, including the Food Bank, Interfaith Health Clinic and Domestic Violence and Sexual Assault Services.

CDBG PROGRAM

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	90% ³⁷

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.

³⁷ The Food Bank and Interfaith Clinic projects are based on area benefit, not direct or presumed benefit to qualified households. This calculation uses the 2000 Census data, as HUD and the Census Bureau have not provided updated low- and moderate-income calculations. This calculation must also be done after the allocation of human service grants that show the number of persons that would benefit from CDBG assistance.

HOME PROGRAM

Forms of Investment

Other forms of investment beyond those identified in Section 92.205 (equity, interest loans, non-interest loans, interest subsidies, deferred payment loans, grants or other forms):

No other forms of investment are used beyond those identified in Section 92.205.

Resale/Recapture

Description of the guidelines for homebuyer activities:

The City of Bellingham has selected the “resale” method of insuring affordability in the Homebuyer Assistance Program when funded with HOME funds. Resale provision, based on low-income occupancy, will be consistent with HOME Regulations 92.254(a)(5)(i). The City’s Homebuyer Assistance Program is directed toward Kulshan Community Land Trust (KCLT). KCLT preserves the public investment in affordability in perpetuity as it retains ownership of the land, while the homeowner owns the improvements. Homeowners which sell HOME assisted housing are provided a fair return on their investment, while ensuring that the home is sold to another income qualified household. The homeowner that sells their home may receive their original contribution (down payment plus first mortgage amount) from sale proceeds, plus the value of any credit-eligible improvements paid by homeowner minus the value of any deferred maintenance or damage. If a lease-purchase homebuyer assistance program is developed, HOME funds will be used consistent with 92.254(a)(5)(ii)(A)(7). In 2012, the Homebuyer Assistance Program will be funded primarily with Community Development Block Grant funds, but HOME funds have also been allocated, thus necessitating requirements with HOME resale provisions.

Description of the guidelines to ensure affordability of units acquired with HOME funds:

The City has a monitoring policy and procedure to ensure affordability of units acquired with HOME funds. Annual notices are provided to HOME-funded properties regarding new income determinations, HOME rents and utility allowances. Annual income certifications are received from the properties, a desk review is completed, and on-site inspection is completed based on a risk-assessment schedule and HOME rules for monitoring.

Refinancing Existing Debt

When loaning HOME funds to rehabilitate units if refinancing is necessary to permit or continue affordability:

HOME funds are not proposed to assist in the refinancing of existing debt secured by multifamily housing that is rehabilitated with HOME funds.