Rockland County

2024 ANNUAL ACTION PLAN

Community Development Block Grant

HOME Investment Partnerships

Emergency Solutions Grant

FY 2024 CDBG - \$2,681,924 FY 2024 HOME - \$924,566.75 FY 2024 ESG - \$225,628

Edwin J. Day, County Executive

Alexandra S. Obremski, Director Office of Community Development 50 Sanatorium Road, Building A, 6th Floor, Pomona, New York 10970

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RCOCD@co.rockland.nv.us http://rocklandgov.com/departments/community-development/ Annual Action Plan 2024

OMB Control No: 2506-0117 (exp. 09/30/2021)

Executive Summary

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

1. Introduction

As a recipient of Federal Entitlement funds, Rockland County has submitted the Consolidated Plan to the U.S. Department of Housing and Urban Development (HUD) for the 2020-2024 program years. This plan described the County's priorities and multi-year goals. Annual Action Plans provide concise summaries of the actions, activities and Federal and non-federal resources that will be used each year to address the priority needs and goals identified in the Consolidated Plan. Rockland County receives Community Development Block Grant (CDBG) HOME Investment Partnership (HOME) and Emergency Solutions Grants (ESG) entitlement funds from HUD. For the 2024 Program Year, the County of Rockland will be receiving \$2,681,924 for CDBG, \$924,566.75 for HOME and \$225,628 for ESG. The County also anticipates receiving HOPWA funding through the Consortium with the City of New York. The county has been advised by the City of New York that for the period April 1, 2024 through March 31, 2025, the amount of \$193,914 will be received in HOPWA funds.

2. Summarize the objectives and outcomes identified in the Plan

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

All objectives are outlined in the 2020-2024 Consolidated Plan submitted to HUD. A copy of the Plan is available through the Office of Community Development or online at http://rockland.gov.com/departments/community-development/reports. Also located in the office and online in the same location is the 2015-2019 Analysis of Impediments to Fair Housing Choice. The 2020-2024 Consolidated Plan identified the following priority needs: 1. Affordable housing for low-and moderate-income households (LMI); 2. Accessible and Supportive Housing; 3. Employment Training and Financial Education Programs; 4. Housing and Services for Persons with HIV/Aids; and Housing and Services for the Homeless. The projects listed on AP-35 identifies funding for projects that address Rockland County's most critical needs.

3. Evaluation of past performance

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

The County continues to assist families, communities and public service organizations utilize entitlement funds from HUD as per the 2020-2024 Consolidated Plan. Affordable Housing is continuing at a slow pace. Unfortunately, the Covid-19 Pandemic caused a standstill. The county conducted a county-wide, comprehensive Community and Affordable Housing Needs Assessment. This extensive project analyzed HUD-provided maps and data, local data to identify problems, reveal barriers, strengths, and solutions. The Assessment was completed and has been presented to the public. The County has met with town and village officials and developers to discuss the building of affordable housing. The County held the 2nd Annual Affordable Housing Forum on April 19, 2024 where there were sessions on what counties can do to support housing affordability, the intersection of housing and workforce development, fair housing and the duty to affirmatively further fair housing, housing realities for vulnerable populations, meeting the housing needs of our seniors, and climate friendly homes. This Forum was attended by over 200 participants and a third forum is planned for 2025. In October 2024, sessions and meetings to discuss and work on the information learned over the course of the Forum are planned. The County prepared and issued an RFP for an updated Analysis of Impediments to Fair Housing, to better identify the factors that are contributing to segregation, preventing integration or the preservation of integrated neighborhoods, producing racially or ethnically concentrated areas of poverty, preventing equal access to opportunity, and inhibiting a fair housing environment. Unfortunately, public perception of affordable housing is not helpful. The County is working on plans to change this perception and hopes this will assist in furthering the ability to build. We have met with Consortium members to discuss ways in which to change perception and have issued an RFP to hire a consultant to prepare an educational campaign for the public. Public Facility Improvements enable consortium municipalities to make improvements to sidewalks, streets, drainage, and public spaces that would not have otherwise been completed without CDBG funds. The County of Rockland puts aside up to 15% of the CDBG grant to specifically fund public services. These funds have been utilized to create, improve and expand services mostly within lowincome neighborhoods in Rockland County.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The County will hold at least one public hearing on the Action Plan during its development. The County published official notice of its public hearings in the County's newspaper of record. The Action Plan is available for at least thirty (30) days for written public comment. The Citizen Advisory Committees of each Town and Village who apply for funds meet to discuss the needs of the municipality and recommendations for use of CDBG funds. The CACs consist of members of each community as per HUD

Annual Action Plan

guidelines. The meeting minutes are required by the County to be submitted to the CD office. The Citizen Participation Plan for the County of Rockland is published within the 2020-2024 Consolidated Plan and is available in the Office of Community Development and/or online at http://www.rocklandgov.com/departments/community-development.

5. Summary of public comments

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

A public hearing was held on July 22, 2024, to review the FY2024 Action Plan to be submitted to HUD. Notice for this hearing was published on the Rockland County website, Community Development Page and in the local newspaper. The notice also includes information for written public comment to be sent to the CD office by mail or email. Public hearings were held in Consortium Municipalities that applied for funding. Public comments from the public hearings held by the Consortium Towns and Villages, the County's public hearing and the comment period will be included in the Action Plan. Copies of Resolutions from each municipality applying for funds are attached to applications as part of program requirements.

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

There were no comments made at the public hearing held on July 22, 2024. There were also no written comments received through the comment period from July 3, 2024 through August 5, 2024.

7. Summary

The overall goal of Rockland County's proposed 2024 Annual Action Plan is to target the available resources to meet needs as identified in the 2020-2024 Consolidated Plan to revitalize neighborhoods and improve the quality of life for Rockland County residents. This is accomplished by funding projects that provide public services, affordable housing, the support of special needs populations and the homeless, revitalization of neighborhoods and the expansion of economic development activities.

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.

Agency Role	Name	Department/Agency
CDBG Administrator	ROCKLAND COUNTY	Office of Community Development
HOPWA Administrator	ROCKLAND COUNTY	Office of Community Development
HOME Administrator	ROCKLAND COUNTY	Office of Community Development
ESG Administrator	ROCKLAND COUNTY	Office of Community Development

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

RCOCD@co.rockland.ny.us

Rockland County Office of Community Development, 50 Sanatorium Road, Bldg. A, 6th Floor, Pomona, New York, 10970

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Rockland County coordinated with a diverse range of public and private entities that provide housing, health, and social services to County residents to inform the Consolidated Plan needs assessment and strategic plan. Consultation included presentations and discussions with the general public and area stakeholder agencies and non-profit organizations, public hearings, online surveys, and direct solicitation/outreach.

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))

The Rockland County Office of Community Development held public meetings on June 2 and June 3, 2021, with public, private and non-profit organizations, whose missions focus on providing affordable housing and human services to low and moderate-income persons, as well as the general public to solicit feedback in identifying refining priorities and strategies for the 2020-2024 Consolidated Plan. The County, in coordination with its consultant, facilitated the meetings with small groups of stakeholders, including the County housing, community development, and Continuum of Care providers. The meetings focused on the Housing and Homeless Needs Assessment and Strategic Plan. Activities were identified which the County could undertake to enhance coordination among public and assisted housing providers, including private, governmental health, mental health, and service agencies. The meetings also examined the barriers to obtaining and creating affordable rental and ownership housing in the County. Methods and strategies were identified to mitigate or eliminate these barriers.

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 Rockland County Office of Community Development works with the lead agency for the Rockland County Continuum of Care (CoC), which is the Rockland County Department of Social Services. The CoC Executive Committee, the primary decision-making group, meets monthly to coordinate all subcommittees, set project priorities, and oversee the application review and approval process for funding. The CoC also has a Planning Committee, Writing Committee, Resource Committee, and HMIS Committee. The CoC is responsible for conducting needs assessments, exploring gaps in services, reviewing proposals for new programs, preparing all final CoC submissions to HUD, establishing a county-wide directory of services, and providing technical support.

Rockland County CoC reaches out to community groups, as well as government agencies to describe programs and services that are available to homeless households. Special emphasis is placed upon

assisting homeless families with children. First and foremost, the Department of Social Services immediately places homeless families with children in a County operated shelter or with various community groups and religious institutions that provide temporary shelter and food during the winter months.

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 CoC Executive Committee, the primary decision-making group, meets monthly to coordinate all subcommittees and determine the allocation of ESG funds. The Rockland County Office of Community Development has a staff member as part of the Executive Committee and attends the meetings.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Village of Nyack Housing Authority
-		
	Agency/Group/Organization Type	Housing
		PHA
		Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Contacted to share data on Section 8 units administered,
	What are the anticipated outcomes of the consultation or areas for	length of waiting lists and needs of housing tenants.
	improved coordination?	
2	Agency/Group/Organization	Spring Valley Housing Authority
	Agency/Group/Organization Type	Housing
		РНА
		Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Contacted to share data on public housing units
	What are the anticipated outcomes of the consultation or areas for	administered, length of waiting lists and needs of housing
	improved coordination?	tenants.
3	Agency/Group/Organization	Town of Ramapo Housing Authority
	Agency/Group/Organization Type	Housing
		РНА
		Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted to share data on Section 8 units administered, length of waiting lists and needs of housing tenants.
4	Agency/Group/Organization	VILLAGE OF NEW SQUARE
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted to share data on Section 8 units administered, length of waiting lists and needs of housing tenants.
5	Agency/Group/Organization	Village of Spring Valley
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted to share data on Section 8 units administered, length of waiting lists and needs of housing tenants.

6	Agency/Group/Organization	Together Our Unity Can Heal!, Inc.
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Interviewed to obtain information about the County's population and families with HIV/AIDS, including general characteristics and needs.
7	Agency/Group/Organization	Hudson Valley Community Services, Inc
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Interviewed to obtain information about the County's population and families with HIV/AIDS, including general characteristics and needs.
8	Agency/Group/Organization	Rockland County Department of Social Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Education Services - Victims Other government - County

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Contacted to share data on Section 8 units administered,
	What are the anticipated outcomes of the consultation or areas for	length of waiting lists and needs of housing tenants.
	improved coordination?	
9	Agency/Group/Organization	Village of Kaser
	Agency/Group/Organization Type	Housing
		РНА
		Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Contacted to share data on public housing units
	What are the anticipated outcomes of the consultation or areas for	administered, length of waiting lists and needs of housing
	improved coordination?	tenants.

10	Agency/Group/Organization	Mid-Hudson Regional Economic Development Council
	Agency/Group/Organization Type	Services-Employment Other government - Local Business Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted and interviewed to share data and obtain information on economic development activity and workforce development trends/needs.
11	Agency/Group/Organization	Rockland Economic Development Corporation
	Agency/Group/Organization Type	Other government - Local Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted to obtain information on economic development activity and workforce development trends/needs.
12	Agency/Group/Organization	Rockland County Department of Economic Development, Tourism & Film
	Agency/Group/Organization Type	Other government - Local Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contacted to obtain information on economic development activity and workforce development trends/needs.
13	Agency/Group/Organization	SISTERS OF CHARTITY
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Housing and Homeless Needs & Impediments to Fair Housing Choice Stakeholder Questionnaire.
14	Agency/Group/Organization	Village of Nyack
	Agency/Group/Organization Type	Housing PHA Services - Housing Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
		Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Housing and Homeless Needs & Impediments to Fair Housing Choice Stakeholder Questionnaire.
15	Agency/Group/Organization	Town of Haverstraw
	Agency/Group/Organization Type	Housing PHA Services - Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Housing and Homeless Needs & Impediments to Fair Housing Choice Stakeholder Questionnaire.
16	Agency/Group/Organization	Helping Hands of Rockland
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Housing and Homeless Needs & Impediments to Fair Housing Choice Stakeholder Questionnaire.
17	Agency/Group/Organization	CENTER FOR SAFETY AND CHANGE
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in Housing and Homeless Needs & Impediments to Fair Housing Choice Stakeholder Questionnaire.

18	Agency/Group/Organization	Rockland Recovery Homes
	Agency/Group/Organization Type	Housing
		Services - Housing
		Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted.	Participated in Housing and Homeless Needs &
	What are the anticipated outcomes of the consultation or areas for	Impediments to Fair Housing Choice Stakeholder
	improved coordination?	Questionnaire.
19	Agency/Group/Organization	Rockland County Pride Center
	Agency/Group/Organization Type	Services - Housing
		Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Non-Homeless Special Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Participated in Housing and Homeless Needs &
	What are the anticipated outcomes of the consultation or areas for	Impediments to Fair Housing Choice Stakeholder
	improved coordination?	Questionnaire.
20	Agency/Group/Organization	Centro De Amigos
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Non-Homeless Special Needs
		Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in a public meeting for stakeholders and the general public.
21	Agency/Group/Organization	Bridges
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in a public meeting for stakeholders and the general public.
22	Agency/Group/Organization	Hamaspik of Rockland County
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted.	Participated in a public meeting for stakeholders and the
	What are the anticipated outcomes of the consultation or areas for	general public.
	improved coordination?	
23	Agency/Group/Organization	Vincent's Village
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Participated in a public meeting for stakeholders and the
	What are the anticipated outcomes of the consultation or areas for	general public.
	improved coordination?	
24	Agency/Group/Organization	L'Dor Assisted Living Facility
	Agency/Group/Organization Type	Housing
		Services-Elderly Persons
		Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Non-Homeless Special Needs
		Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted.	Participated in a public meeting for stakeholders and the
	What are the anticipated outcomes of the consultation or areas for	general public.
	improved coordination?	

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

The County reached out to a wide range of agencies and not-for-profits as part of its Consultation for the Needs Assessment, Housing Market Analysis, and Strategic Plan development process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of	Rockland County Department of Social Services	Rockland County Department of Social Services is the lead agency in the Rockland County Continuum of Care in its efforts to address homelessness and priority needs of homeless individuals and families, including sub-populations. The CoC addresses the housing and supportive service needs in each stage of the process to help homeless persons make the transition to permanent housing and independent living. Rockland County will continue to support the CoC strategy to meet the needs of the homeless persons and those at risk of becoming homeless by providing entitlement funding for programs that emphasize support services to the homeless, in an
		effort to move the homeless toward self-sufficiency.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

All 18 municipalities included in the Rockland County consortium area were invited to participate in all stakeholder meetings and public outreach efforts as part of the 2020-2024 Consolidated Plan process. Copies of the stakeholder questionnaire and the public needs assessment survey were also sent to representatives of all 18 municipalities.

Additionally, County departments that coordinate with the Office of Community Development on the implementation of the Consolidated Plan were consulted as part of the process, including the Department of Social Services and Department of Mental Health.

In implementing the 2020-2024 Consolidated Plan, each consortium member community will be responsible for its own public hearings and group meetings, a public information program, and responding to citizen proposals for their respective communities. The Office of Community Development will coordinate the aggregation of all funding requests and preparation of the annual action plan for all consortium member communities.

AP-12 Participation – 91.105, 91.200(c)

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

Rockland County has made extensive efforts to consult with other public and private entities that provide assisted housing, health services and social services in the development of the 2020-2024 Consolidated Plan and the 2021 Action Plan. Public Meetings were held in the Office of Community Development and any Consortium Member that applied for funding has held a hearing. Consortium Municipalities held Public Meetings to discuss the 2024 Plan as well as activating their Citizen Advisory Committees and holding 2 workshops. Each consortium municipality was advised to contact the not-for-profit agencies within their community in order to include them in the CDBG Process and inform them of the funding opportunity. Including as many different types of constituents of Rockland County assists the County in meeting the goals of the Consolidated and Action Plans.

Citizen Participation Outreach

Sort Orde	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non- targeted/broad community Service Providers	Consolidated/Action Plan Team - Urbanomics, BFJ Planning, and Asst. Director of CD attended. No other participants	No comments received	No comments rejected as none were received.	

2	Public Meeting	Non- targeted/broad community Service Providers	Consolidated/Action Plan Team - Urbanomics, BFJ Planning, and Asst. Director of CD attended.	How do we collaborate in the housing needs conversation; Concern of not enough affordable housing for young adults; What is the best place to connect people with services; Not enough Section 8 and do we contact our State Legislators or Senator Schumer for more; concern about housing needs for the County's aging populations; concern for services for Orthodox Jewish Community which has special needs, i.e. kosher diet; no options of where to put people with mental	All comments were accepted, and an appendix was put on the 2020-2024 Consolidated Plan showing the conversation and suggestions. The meetings for the 2020- 2024 CP and the 2021 AP were held together due to extension for COVID-19.	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	URL (If applicable)
					and reasons	
				illness; housing		
				providers need to		
				support kosher		
				options and		
				cultural aspects.		
			Each Consortium			
		Non-	Town and Village			
		targeted/broad	conducted a Public	No Public comment		
3	Public Meeting	community	Hearing on the	was received at	n/a	
			proposed projects to	these meetings.		
		Service Providers	be submitted for the			
			2021 CDBG funding			

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)
4	Public Meeting	Non- targeted/broad community	A public hearing was held on the 2021 Annual Action Plan on Tuesday July 20, 2021. The meeting was opened at 5:00 p.m. and was attended by 3 members of the Office of CD. No one attended the meeting. The meeting was closed by Maria Frank at 5:45 p.m. The written public comment period was open until August 15, 2021, to be sent to the CD Program Coordinator. There were no written public comments sent in, nor were there any phone calls or questions.	No comments received at hearing or during written comment period.	n/a.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Non- targeted/broad community	The Rockland County Office of Community Development held its public hearing on the 2022 Annual Action Plan on June 30, 2022. It was attended by the Director, Assistant Director, and CD Program Coordinator to answer any questions or comments.	No comments were received		

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)
7	Newspaper Ad	Non- targeted/broad community	The Rockland County Office of Community Development posted its draft Action Plan on its website for a second public comment period from September 15 - October 17, 2022. Interested parties were directed to email RCOCD with any comments on the draft Action Plan.	No comments were received.	N/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			encouraged emails to follow-up on			
			discussions at this meeting.			

		-			
		Development posted			
		its draft Action Plan			
		on its website for a			
		public comment			
		period from June 20,			
		2023 through July 21,			
		2023. Interested			
		parties were directed			
		to email RCOCD with			
		any comments on the			
		draft 2023 Action			
	Non-	Plan. Notice was	No Commonte viero		
Public Meeting	targeted/broad	published in Journal		n/a	
	community	News to invite all	received.		
		interested parties to			
		review and comment			
		on the draft plan. No			
		comments were			
		received through the			
		comment period. A			
		public hearing was			
		held on July 20, 2023.			
		This hearing was held			
		in person at the			
		RCOCD Office as well			
		as virtually for all			
		interested parties to			
	Public Meeting	Public Meeting targeted/broad	Public Comment period from June 20, 2023 through July 21, 2023. Interested parties were directed to email RCOCD with any comments on the draft 2023 ActionPublic MeetingNon-Public Meetingtargeted/broad communityPublic Meetingvargeted/broad communityPublic Meetingnumeration targeted/broad communityPublic Meetingnumeration targeted/broad communityPublic Meetingnumeration targeted/broad communityPublic Meetingnumeration targeted/broad communityPublic Meetingnumeration targeted/broad communityPublic Meetingnumeration targeted/broad comment and comment on the draft plan. No comments were received through the comment period. A public hearing was held on July 20, 2023. This hearing was held in person at the RCOCD Office as well as virtually for all	Public MeetingNon- targeted/broad communityOffice of Community Development posted its draft Action Plan on its website for a public comment period from June 20, 2023 through July 21, 2023. Interested parties were directed to email RCOCD with any comments on the draft 2023 Action Plan. Notice was published in Journal News to invite all interested parties to review and comment on the draft plan. No comments were received through the comment period. A public hearing was held on July 20, 2023. This hearing was held in person at the RCOCD Office as well as virtually for allNo Comments received as virtually for all	Public MeetingNon- targeted/broad communityOffice of Community Development posted its draft Action Plan on its website for a public comment period from June 20, 2023 through July 21, 2023. Interested parties were directed to email RCOCD with any comments on the draft 2023 ActionNo Comments were received.n/aPublic MeetingNon-Plan. Notice was published in Journal communityNo Comments were received.n/aPublic MeetingNon-Plan. Notice was published in Journal comments on the draft 2023 ActionNo Comments were received.Public MeetingNon-Plan. Notice was published in Journal communityNews to invite all interested parties to received.Public MeetingNon-Plan. Notice was public hearing was held on July 20, 2023. This hearing was held in person at the RCOCD Office as well as virtually for all

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)
			attend. It was			
			attended by the			
			Director of			
			Community			
			Development and			
			Assistant Director of			
			Community			
			Development to			
			answer any questions			
			or comments. The			
			meeting was opened			
			at 3:00 p.m and			
			closed at 3:15 p.m.			
			There were no			
			attendees and no			
			comments.			

Sort Orde	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			encouraged emails to			
			follow-up on			
			discussions at this			
			meeting.			

			The Deckland County			
			The Rockland County			
			Office of Community			
			Development posted			
			its draft Action Plan			
			on its website for a			
			public comment			
			period from July 3,			
	Public Meeting	Non- targeted/broad community	2024, through August	No comments were received.	n/a	
			5, 2024. Interested			
			parties were directed			
			to email RCOCD with			
			any comments on the			
			draft 2024 Action			
			Plan. Notice was			
11			published in Journal			
			News to invite all			
			interested parties to			
			review and comment			
			on the draft plan. No			
			comments were			
			received through the			
			comment period. A			
			public hearing was			
			held on July 22, 2024.			
			This hearing was held			
			in person at the			
			RCOCD Office as well			
			as virtually for all			
			interested parties to			
			interested parties to			

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)
			attend. It was			
			attended by the			
			Director of			
			Community			
			Development and			
			Assistant Director of			
			Community			
			Development to			
			answer any questions			
			or comments. The			
			meeting was opened			
			at 3:00 p.m. and			
			closed at 3:15 p.m.			
			There were no			
			attendees and no			
			comments.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The County of Rockland submitted to the United States Department of Housing and Urban Development (HUD) a five-year consolidated plan for the years 2020-2024. The County is required to submit its Action Plan and Certifications as part of the five-year Consolidated Plan process. The County has received notification of FY 2024 funding of \$2,681,924 for the Community Development Block Grant (CDBG) program; \$924,566.75 for the HOME Investment Partnership program and \$225,628 for the Emergency Solutions Grant. The projects that are listed are projections of funding and are subject to change based on the final grant from HUD.

The Rockland County Office of Community Development has historically required all potential applicants to attend a workshop. The RCOCD held mandatory virtual pre-application workshops in late 2023 and early 2024. The RCOCD staff made themselves available to any interested party during business hours when requested in order to allow for any questions or training needed to apply for the program. Through this process, not-for-profit agencies located in the County and Rockland County Towns/Villages were represented. The workshops included extensive training on each of the Entitlement programs and included reach-out on community needs. Once funding is approved and subrecipient agreements are executed for municipalities and non-profits, RCOCD will ensure that they are available to train and advise all in order to explain the requirements to use these funds.

The County of Rockland received 28 applications for Entitlement funding requests for a total of \$4,002,955 in the FY2024 process.

Through the selection process, the Office of Community Development scored each project using enhanced scoring criteria that considered past performance and which prioritized applications that maximized the number of low- and moderate-income individuals served by CDBG dollars. Additional weight was given to applications that completed the citizen's participation process following the Citizen's Participation Plan. The Consortium's CDBG Advisory committee provided its feedback to RCOCD on July 1, 2024.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						Funds to support improvements in
	federal	Admin and						Low to Moderate Income (LMI)
		Planning						areas.
		Economic						
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	2,681,924	0	0	2,681,924	0	
HOME	public -	Acquisition						Funds will be used to assist
	federal	Homebuyer						households at or below 30% and up
		assistance						to 60% AMI for rental housing; and
		Homeowner						at or below 80% AMI for
		rehab						homeownership opportunities.
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	924,567	0	0	924,567	0	

Annual Action Plan

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public -	Conversion and						ESG funds will be used for the
	federal	rehab for						following program components,
		transitional						street outreach, homeless
		housing						prevention, rapid re-housing
		Financial						assistance, HMIS and 7.5% for
		Assistance						administrative activities
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	225,628	0	0	225,628	0	

Table 5 - Expected Resources – Priority Table

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

Several of the County's sub-grantees have been very successful in leveraging funds from other federal, state, private, and public funds. Through the HOME Program, Rockland Housing Action Coalition, Westhab, and the Sisters of Charity Housing Development Corporation matched nearly every dollar on a dollar for dollar basis from state sources and private funds. The County also funds projects that are funded through the New York State Homes and Community Renewal's Low Income Housing Tax Credit program. These projects, through the efforts of the Office of Community Development, typically receive a Payment in Lieu of Taxes (PILOT) and the tax benefits contribute towards the match. The County also utilizes the appraised value of the land as a HOME match, when it qualifies. Sisters of Charity Housing Development Corporation was awarded 2023 HOME funds for the necessary rehabilitation of Seton Village (a senior affordable housing community). They are investing sufficient other funding sources to provide a 100% match to HOME funds. We are in final stages to fund Westhab with 2023 and prior year HOME funds to construct a 100% affordable at 60% AMI and below rental development in the Village of Haverstraw, consisting of between 40 and 80 units.

The Center for Safety and Change and the Legal Aid Society have also matched dollar for dollar, funds used for the operational expenses at the battered women's shelter, funded by ESG from the State of New York Criminal Justice division, private donations, and through their annual support from the County of Rockland budget.

Many communities also leverage funds from New York State for their improvement projects.

The County of Rockland is currently working with all its depositories for further future leveraging capabilities, and since the County of Rockland became its own Metropolitan Statistical Area, banks now have to reexamine their participation within Rockland.

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

The County continues to evaluate municipally owned land and in rem tax foreclosure properties to address identified needs.

Discussion

Not Applicable

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Affordable	2020	2024	Affordable	Village of	Affordable Housing	CDBG:	Rental units rehabilitated: 11
	Housing			Housing	Haverstraw	for LMI Households	\$120,000	Household Housing Unit
				Public Housing	Town of		HOME:	Homeowner Housing Added: 2
				Homeless	Ramapo		\$786,564	Household Housing Unit
				Non-Homeless	Village of			Tenant-based rental assistance
				Special Needs	Kaser			/ Rapid Rehousing: 30
					Village of			Households Assisted
					Spring Valley			
					Village of			
					Nyack			
					CD Target			
					Area			

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order 2	Neighborhood	Year 2020	Year 2024	Non-Housing	Area Village of	Public Facilities &	CDBG:	Public Facility or Infrastructure
2	Revitalization	2020	2024	Community	Haverstraw	Infrastructure	\$1,240,200	Activities other than
	Revitalization			,	Town of		Ş1,240,200	
				Development		Improvements		Low/Moderate Income
					Ramapo			Housing Benefit: 62919
					Village of			Persons Assisted
					Kaser			
					Village of			
					Nyack			
					CD Target			
					Area			
3	Services for Non-	2020	2024	Non-Homeless	Village of	Services for Non-	CDBG:	Public service activities other
	Homeless Special			Special Needs	Haverstraw	Homeless Special	\$191,500	than Low/Moderate Income
	Needs				Town of	Needs Population		Housing Benefit: 1337 Persons
					Ramapo			Assisted
					Village of			
					Kaser			
					Village of			
					Spring Valley			
					Village of			
					Nyack			
					CD Target			
					Area			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Economic	2020	2024	Non-Housing	Village of	Employment	CDBG:	Public service activities other
-	Development	2020	2024	Community	Haverstraw	Training & Financial	\$25,000	than Low/Moderate Income
	Development			Development	Town of	Education	<i>\$23,000</i>	Housing Benefit: 56 Persons
						Euucation		Assisted
					Ramapo			Assisted
					Village of			
					Kaser			
					Village of			
					Spring Valley			
					Village of			
					Nyack			
					CD Target			
					Area			
5	Homeless	2020	2024	Homeless	Village of	Housing & Services	CDBG:	Public service activities for
	Assistance and				Haverstraw	for Homeless	\$75,000	Low/Moderate Income
	Prevention				Town of			Housing Benefit: 90
					Ramapo			Households Assisted
					Village of			
					Kaser			
					Village of			
					Spring Valley			
					Village of			
					Nyack			
					CD Target			
					Area			

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	The County of Rockland will continue to preserve, upgrade and develop new dwelling units to assist extremely low-, low- and moderate-income households (0-80% AMI) with emphasis on extremely low- and low-income households (0- 50%). Affordable housing is the highest priority in the Consolidated Plan 2020-2024. The County of Rockland and the Village of Spring Valley entered into a Conciliation Agreement with HUD to develop and/or rehabilitate at least 62 affordable housing units. 4 Units from the Nyack Point Project in Nyack have been accepted by HUD. The units serve persons with incomes less than or equal to 80% of the AMI for Rockland County. 58 affordable units are to be built and rehabilitated in a range of sizes and amenities. 50% of the units must be located in the Village of Spring Valley unless otherwise agreed to by HUD. These units are designated for family occupancy and must be a mix of homeownership and rental units. At least 50% of the total 62 units must be homeownership units. The units shall be affordable to and occupied by households with income at or below 80% and 60% of AMI. All affordable units will be constructed or converted to be accessible to persons with disabilities.
2	Goal Name	Neighborhood Revitalization
	Goal Description	Assist in revitalizing communities through public facility improvements, streetscapes, sidewalks, etc.
3	Goal Name	Services for Non-Homeless Special Needs
	Goal Description	continue to support services for non-homeless special needs populations, with particular focus on seniors and youth
4	Goal Name	Economic Development
	Goal Description	Increase the incomes and future economic prospects of Rockland County's low/moderate income residents through increased private sector employment opportunities

5	Goal Name	Homeless Assistance and Prevention
	Goal	Continue to assist homeless residents by providing housing and supportive services and to prevent homelessness by
	Description	providing those at risk of homelessness with supportive services. CoC funding received through Department of Social
		Services has enabled supportive housing programs.

Projects

AP-35 Projects – 91.220(d) Introduction

HUD requires a consolidated planning process for CDBG, HOME and ESG programs. The Five-Year Consolidated Plan outlines proposed strategies for the expenditures of CDBG, HOME, and ESG for the purpose of providing a suitable living environment through safer, more livable neighborhoods and greater participation of lower-income residents throughout the County of Rockland. The Consolidated Plan also outlines how the expenditure of federal funds will increase housing opportunities; reinvestment in deteriorating neighborhoods; provide decent housing by preserving the existing affordable housing stock; increase the availability of affordable housing; reduce discriminatory barriers; increase the supply of supportive housing for those with special needs; prevent homelessness; and transition homeless persons and families into housing. Furthermore, the Action Plan identifies the strategies to expand economic opportunities through employment opportunities that pay self sufficiency wages; homeownership opportunities; development activities that promote long-term community sustainability; and the empowerment of lower-income persons to achieve self-sufficiency.

ESG funds were allocated in the 2022 and 2023 Program Year - ESG funds will be used for the 2022, 2023 and 2024 to fund projects such as Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid re-housing assistance, HMIS and up to 7.5% of the allocation for administrative activities.

CDBG, HOME and ESG Projects are to be carried out within the Urban County. Consortium municipalities and not-for-profits apply for and receive funds to conduct eligible activities with CDBG, HOME and ESG funds. The following categories have been funded.

Projects

#	Project Name
1	General Program Administration
2	ESG24 ROCKLAND
3	Planned Repayments of Section 108 Loans
4	HOME CHDO
5	Street Improvements
6	Senior Services
7	Sidewalks
8	Senior Centers
9	Acquisition of Real Property
10	Youth Services
11	Employment Training

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#	Project Name
12	Parks & Recreational Facilities
13	Rental Housing Subsidies
14	Construction of Rental Housing

Table 7 - Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	General Program Administration
	Target Area	CD Target Area
	Goals Supported	Affordable Housing Neighborhood Revitalization Services for Non-Homeless Special Needs Economic Development Homeless Assistance and Prevention
	Needs Addressed	Affordable Housing for LMI Households Public Facilities & Infrastructure Improvements Services for Non-Homeless Special Needs Population Employment Training & Financial Education Housing & Services for Persons with HIV/AIDS Housing & Services for Homeless
	Funding	CDBG: \$536,385 HOME: \$92,457
	Description	Overall program administration, including (but not limited to) salaries, wages and related costs of grantee staff or others engaged in program management, monitoring and evaluation.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	ESG24 ROCKLAND
	Target Area	CD Target Area
	Goals Supported	Homeless Assistance and Prevention
	Needs Addressed	Housing & Services for Homeless
	Funding	ESG: \$225,628
	Description	THE COUNTY OF ROCKLAND PLANS TO USE THE 2023 FEDERAL FISCAL YEAR ALLOCATION OF HESG FUNDS FOR STREET OUTREACH, OPERATE A SHELTER FOR THE HOMELESS, HOMELESSNESS PREVENTION, PROVIDE UTILITY ASSISTANCE AND EMERGENCY RENTAL ASSISTANCE TO PREVENT HOMELESNESS, IMPLEMENT RAPID REHOUSING STRATEGIES, HMIS, AND FOR PROGRAM ADMINISTRATION.

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Shelter Operation and Street Outreach
		Homeless Prevention and Rapid Rehousing
		Elder & Vulnerable Population Civil Legal Service
3	Project Name	Planned Repayments of Section 108 Loans
	Target Area	CD Target Area
	Goals Supported	Affordable Housing Neighborhood Revitalization Services for Non-Homeless Special Needs Economic Development Homeless Assistance and Prevention
	Needs Addressed	Affordable Housing for LMI Households Public Facilities & Infrastructure Improvements Services for Non-Homeless Special Needs Population Employment Training & Financial Education Housing & Services for Persons with HIV/AIDS Housing & Services for Homeless
	Funding	CDBG: \$291,039
	Description	Repayments of principal for Section 108 loan guarantees.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	HOME CHDO
	Target Area	CD Target Area

	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing for LMI Households
	Funding	HOME: \$138,865
	Description	HOME CHDO
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	Street Improvements
	Target Area	CD Target Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Public Facilities & Infrastructure Improvements
	Funding	CDBG: \$250,000
	Description	Installation or repair of streets, street drains, storm drains, curbs and gutters, tunnels, bridges, and traffic lights/signs. It may also include improvements that include landscaping, street lighting and/or street signs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	West Haverstraw Safe Street Community Phase V
6	Project Name	Senior Services
	Target Area	CD Target Area
	Goals Supported	Services for Non-Homeless Special Needs
	Needs Addressed	Services for Non-Homeless Special Needs Population
	Funding	CDBG: \$85,000

	Description	Services for the Elderly. May be used for an activity that serves both the elderly and the handicapped provided it is not intended primarily to serve persons with handicaps
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	JFS Senior Support Services
		MOW Therapeutic Horticultural Sensory Program for Older Adults
		Rockland Farm Alliance Project Greens
		Thorpe Village Social Worker
7	Project Name	Sidewalks
	Target Area	CD Target Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Public Facilities & Infrastructure Improvements
	Funding	CDBG: \$275,000
	Description	Improvements to sidewalks, sidewalk improvements that include the installation of trash receptacles, lighting, benches, and trees.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Village of Haverstraw Curbs and Sidewalk Program
8	Project Name	Senior Centers
	Target Area	CD Target Area
	Goals Supported	Services for Non-Homeless Special Needs
	Needs Addressed	Services for Non-Homeless Special Needs Population
	Funding	CDBG: \$300,000

	Description	Acquisition, construction, or rehabilitation of facilities (except permanent housing) for seniors.		
	Target Date	6/30/2025		
	Estimate the number and type of families that will benefit from the proposed activities			
	Location Description			
	Planned Activities	Village of Nyack Senior Center Improvements		
9	Project Name	Acquisition of Real Property		
	Target Area	CD Target Area		
	Goals Supported	Affordable Housing		
	Needs Addressed	Affordable Housing for LMI Households		
	Funding	CDBG: \$90,000		
	Description	Acquisition of real property that will be developed for a public purpose.		
	Target Date	6/30/2025		
	Estimate the number and type of families that will benefit from the proposed activities			
	Location Description			
	Planned Activities	Habitat For Humanity Affordable Housing		
10	Project Name	Youth Services		
		CD Target Area		
		Services for Non-Homeless Special Needs		
		Services for Non-Homeless Special Needs Population		
	Funding	CDBG: \$170,000		
	Description	Services for young people aged 13 to 19 that include, for example, recreational services limited to teenagers and teen counseling programs. Also, for counseling programs that target teens but include counseling for the family as well.		
	Target Date	6/30/2025		

	Estimate the number and type of families that will benefit from the proposed activities			
	Location Description			
	Planned Activities	CFSC Aftercare Program		
		Chiku Awali African Dance, Arts & Cultural Program		
		Dominican University Student Success Expansion Program		
		HAAC After Hours Youth Enrichment Program		
		YMCA Teens in Action Program		
		West Street Child Care Learning Center Sumer Enrichmant Program		
11	Project Name	Employment Training		
	Target Area	CD Target Area		
Goals Supported		Economic Development		
	Needs Addressed	Employment Training & Financial Education		
	Funding	CDBG: \$38,000		
		Assistance to increase self-sufficiency, including literacy, independent living skills and job training.		
	Target Date	6/30/2025		
	Estimate the number and type of families that will benefit from the proposed activities			
	Location Description			
	Planned Activities	COC Workplace Readiness Program		
Finklestein Memorial Library ESL Classes		Finklestein Memorial Library ESL Classes		
12	Project Name	Parks & Recreational Facilities		
	Target Area	CD Target Area		
	Goals Supported	Neighborhood Revitalization		
	Needs Addressed	Public Facilities & Infrastructure Improvements		
	Funding	CDBG: \$646,500		

	Description	Development of open space areas or facilities intended primarily for recreational use.			
	Target Date	6/30/2025			
	Estimate the number and type of families that will benefit from the proposed activities				
	Location Description				
	Planned Activities	Town of Clarkstown Central Nyack Playground			
		Town of Ramapo Harry Reiss Park			
13	Project Name	Rental Housing Subsidies			
	Target Area	CD Target Area			
	Goals Supported	Affordable Housing			
	Needs Addressed	Affordable Housing for LMI Households			
	Funding	HOME: \$150,000			
	Description	Tenant subsidies exclusively for rental payments for more than three months. Security and Homeless Prevention			
	Target Date	6/30/2025			
	Estimate the number and type of families that will benefit from the proposed activities				
	Location Description				
	Planned Activities	HOME TBRA Program			
14	Project Name	Construction of Rental Housing			
	Target Area	Village of Haverstraw CD Target Area			
	Goals Supported	Affordable Housing			
	Needs Addressed	Affordable Housing for LMI Households			
	Funding	HOME: \$543,244			

Description	(HOME) funds may be used for the acquisition, new construction, or rehabilitation of affordable rental housing. HOME-assisted rental units must be occupied by income eligible tenants, and carry rent and occupancy restrictions for varying lengths of time depending upon the amount of HOME funds invested per unit. Included in this topic area is information about program design issues, subsidy layering, lease terms, calculating rents, using HOME with Low-Income Housing Tax Credits, and managing for ongoing compliance.
Target Date	6/30/2025
Estimate the number and type of families that will benefit from the proposed activities	10 Low Moderate Income families
Location Description	30 West Street, Haverstraw, New York
Planned Activities	

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

Not less than 70 percent of CDBG funds must be used for activities that benefit low- and moderateincome persons. HUD uses special Census data to determine where at least 51 percent of households have incomes at or below 80 percent of the area median income (AMI) Additionally, the County funds only projects that fill as 46.90% for eligibility as an area benefit.

Geographic Distribution

Target Area	Percentage of Funds
Village of Haverstraw	11
Town of Ramapo	13
Village of Kaser	0
Village of Spring Valley	0
Village of Nyack	11
CD Target Area	65

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Federal CDBG and HOME funds are intended to provide low- and moderate-income households with decent housing, suitable living environments and expanded economic opportunities. Eligible activities include community facilities and improvements, housing preservation and rehabilitation, affordable housing development activities, public services, economic development, planning and administration.

To the highest extent possible, funds are geographically distributed so that all consortium members receive assistance. However, this is based on a demonstrated need and eligibility, not purely on want. The majority of funds are allocated for services that support the low- and moderate-income population County wide.

Discussion

For an activity or project to be eligible for funding, it must qualify as meeting one of the three national objectives of the program: 1) Principally benefit (at least 51%) low and moderate-income persons. 2) Aid in the prevention of slums or blight; or 3) Meet community development needs having a particular urgency. Priorities that guide the allocation of CPD funds are derived from the following goals: To provide decent housing: To provide a suitable living environment; and to expand economic opportunities.

In addition to national objectives and performance measurements, the county must weigh and balance

the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. The county continually receives input through outreach efforts helping to prioritize funding for community facilities, community services, homeless facilities and services, economic development, and public improvements. In summary, projects are reviewed, and funding allocations are made based upon the above criteria, including the project's ability to reach and serve the areas and persons with the greatest need.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Rockland County funds will support the following affordable housing projects in 2024:

1. Tenant based Rental Assistance subsidies, exclusively for rental payments for more than three months.

2. CHDO funds and HOME funds to assist rental units being rehabbed in the Town of Clarkstown for families of 60% or less AMI.

One Year Goals for the Number of Households to be Supported		
Homeless	50	
Non-Homeless	50	
Special-Needs	50	
Total	150	

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

	One Year Goals for the Number of Households Supported Through			
F	Rental Assistance	30		
ר	he Production of New Units	0		
F	Rehab of Existing Units	11		
4	Acquisition of Existing Units	0		
ר	otal	41		
Table 10 - One Year Goals for Affordable Housing by Support Type				

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Nyack Housing Authority, Spring Valley Housing Authority and Spring Valley Housing Authority operate 8 public/low income housing complexes, consisting of 510 units, within their own jurisdictions. Some of these properties are project-based Section 8 properties.

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

Each PHA is responsible for preparing its own Public Housing Agency Plan which includes the actions that the PHA will undertake to address the needs of their residents.

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

Each PHA is responsible for preparing its own Public Housing Agency Plan which includes the actions that the PHA will undertake to address the needs of their residents.

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

Not Applicable

Discussion

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

Introduction

Legal Services of the Hudson Valley Rockland Elder Program - Providing comprehensive civil legal services to address the unique needs of Seniors in Rockland County. Legal assistance for eviction prevention, domestic violence, disability, bankruptcy or consumer protection, senior services, discrimination benefits, income protection and maintenance, Medicaid and Medicare, preservation of affordable housing and general practice for chronically ill seniors. Center for Safety and change (CSC) Aftercare Program. This program assists victims of DV with counseling, housing issues, employment issues, childcare, etc.

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

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

Members of the Continuum of Care collaborative, consisting of community groups, government agencies, housing advocates and others periodically visit areas where homeless individuals and families congregate. The individuals/families in need are referred to (and sometimes brought) the Department of Social Services and faith-based organizations for temporary emergency housing and services. The goal is to help them find permanent housing. Through the ESG allocation, the County of Rockland intends to allocate and assist in street outreach.

Addressing the emergency shelter and transitional housing needs of homeless persons

Members of the Continuum of Care collaborative, consisting of community groups, government agencies, housing advocates and others periodically visit areas where homeless individuals and families congregate. The individuals/families in need are referred to (and sometimes brought) the Department of Social Services and faith-based organizations for temporary emergency housing and services. The goal is to help them find permanent housing.

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 individuals/families in need are referred to (and sometimes brought) the Department of Social Services and faith-based organizations for temporary emergency housing and services. The goal is to

help them find permanent housing.

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 individuals/families in need are referred to (and sometimes brought) the Department of Social Services and faith-based organizations for temporary emergency housing and services. The goal is to help them find permanent housing.

Discussion

AP-75 Barriers to affordable housing - 91.220(j)

Introduction:

Barriers to Affordable housing include but are not limited: to Real Estate Market Prices compounded by property tax burden; lack of land available and suitable for housing development; and local zoning ordinances. Additionally, a lack of affordable housing to serve protected classes, the age and condition of the housing stock. inadequate knowledge of fair housing rights and requirements, a loss of subsidized and affordable housing stock, overall discrimination in the housing market and discriminatory lending policies and practices.

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

In order to make change, it is necessary to increase the number of quality affordable rental and ownership housing opportunities in the county; continue to support affordable housing production in all areas, facilitate access to below market rate units and ensure low- and moderate-income residents have access to affordable housing opportunities in all communities. The deteriorated housing stock should be rehabilitated along with eliminating lead-based paint hazards in existing units.

Tenants need to be educated regarding their rights under existing regulation program by expanding local knowledge of fair housing rights and when projects are converted to market rate, alternate strategies must be considered.

Households and housing related organizations must be educated about fair housing law with respect to lending practices. This will also reduce housing lending discrimination in Rockland County. Knowledge is a powerful tool.

Discussion:

AP-85 Other Actions - 91.220(k)

Introduction:

Rockland County and the Village of Spring Valley have entered into a Voluntary Conciliation Agreement with HUD to build affordable rental housing and housing for homeownership. A marketing plan has been submitted to HUD for approval, and the County is working to incorporate suggested revisions. We have been meeting with numerous developers about building affordable housing within Rockland. Reports are being sent to HUD on a quarterly basis and meetings are being conducted to ensure compliance. The County has been working with HUD to amend the agreement in order to adjust some of the requirements agreed upon at the time of signing.

Actions planned to address obstacles to meeting underserved needs

The County is diligently working with agencies that are looking into properties to create additional housing. It is a major obstacle to meet the County's underserved needs because of limited funding and staff. Another major obstacle is lack of available land to build housing. RCOCD has met with at least 12 developers regarding bringing affordable housing projects to Rockland County. We are looking to use HOME and HOME ARP monies to assist in this development of housing. We are presently working with 2 developers and the Rockland Housing Action Coalition to facilitate the building of affordable units within Rockland. We are also going to produce an education and marketing plan to explain and rebrand affordable housing so that additional housing may be preserved and perhaps constructed. There is a Request for Proposal out to hire a qualified consultant to work with on this plan.

Actions planned to foster and maintain affordable housing

The County will continue to work with its CHDO's and other affordable housing providers to maintain and develop the County's supply of public and affordable housing. The County is in discussion with other agencies and providers to become CHDO's, CBDO's, etc. to widen the outreach and effectiveness of using federal funds allocated. We did pick up one additional CHDO this program year.

Actions planned to reduce lead-based paint hazards

The RCOCD does not utilize any of its entitlement funds for lead-based paint programs. However, in the use of HOME Program funds, the County is fully compliant with HUD lead hazard control regulations at 24 CFR Part 35. Proving safe and healthy homes is an objective that will be particularly be met through this program. In the CDBG Program, all local government grant recipients are required to comply with 24 CFR 570.487 with respect to lead paint poisoning prevention. The County was awarded a Grant from the Housing Trust Fund Corporation for remediation of lead hazards in rental units. We have had staff professionally trained and certified with the EPA to conduct work on this program. It is our intention to

apply for a HUD grant in furtherance of our efforts to reduce lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

There is a program with Rockland Community College that assists in resume preparation. Not-for-profit agencies have been working with constituents to find employment and/or improve their employment possibilities. We are in the process of reaching out to the Workforce Development Council to attempt to utilize their program to improve employment possibilities.

Actions planned to develop institutional structure

The major gap in the institutional delivery system remains the scarce financial resources and limited staff to effectively operate service programs and projects. Additional funding is needed to support additional programs and the development of affordable housing for the special needs' populations. The County will continue to coordinate with its consortium member communities and agencies county-wide to supplement the HUD funds currently received.

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

The Continuum of Care meets monthly. The collaboratives meet monthly. The Office of Community Development will seek to facilitate bi-annual meetings of relevant county agencies and service providers to oversee strategy implementation and to ensure coordination of efforts at the local level.

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to	
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not	
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
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.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	70 4 50/
income. Specify the years covered that include this Annual Action Plan.	79.15%

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:

None

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 County will use the HUD Recapture Provisions for its Homebuyer Assistance Program to ensure that the amount of HOME funds provided directly to homebuyers are imposed for the duration of the period of affordability and are mandated to recapture provisions per 24 CFR 92.254(a)(5)(ii). This restriction is enforceable by a Mortgage & Note filed on the eligible property.

If the original homebuyer remains in the home for the full period of affordability, no recapture provisions apply. However, if the premises are sold, cease to be the Homebuyer's primary residence, or there is any change in the title during the term of the Mortgage & Note, which commences upon the Completion Date, or the Homebuyer is not in substantial compliance with the Mortgage & Note, the County will recapture the full HOME direct-subsidy assistance, which will be the amount remaining on the affordability period at time recapture is triggered; to include, any payments made or pro rata reduction amount applied during the affordability period.

The assistance shall be structured as a loan with zero percent interest. No payments will be required during occupancy. The County loan will become due and payable upon the following conditions regardless of the length of occupancy: If the home is sold, transferred, refinanced, no longer continues to be the homeowner's principal residence, or if the first mortgage terms are satisfied.

If, however, the net proceeds are insufficient to repay both the direct HOME subsidy assistance and the Homebuyer's investment, the County will recapture the net proceeds less the Homebuyer's investment. HUD defines the net proceeds as the sales price minus the loan repayments and closing costs. Under no circumstances will the County recapture more than is available from the net proceeds of the sale.

Direct HOME subsidy is the amount of HOME assistance, *including any program income*, that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value, the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can the PJ recapture more than is available from the net proceeds of the sale.

During the recapture restriction period, the original homebuyer will be entitled to any increase in value that remains after all debts are repaid, including the Homebuyer Assistance Program loan,

with the following provisions to be incorporated into the Mortgage & Note.

Reduction during affordability period: Repayment of the Homebuyer assistance deferred second mortgage loan is on a pro rata reduction basis. During the first five years of the loan, repayment shall be the outstanding principal only. The loan will reduce annually from years six through fifteen at a rate of 10% of the loan amount with the loan forgiven after fifteen years if the homeowner owns and occupies the house as the primary residence for the required affordability period. Forgiveness of the full amount of assistance will only occur if the homeowner occupies and retains the property for the full affordability period. No interest shall accumulate on this loan during the affordability period.

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 County will use the HUD Recapture Provisions for its Homebuyer Assistance Program to ensure that the amount of HOME funds provided directly to homebuyers are imposed for the duration of the period of affordability and are mandated to recapture provisions per 24 CFR 92.254(a)(5)(ii). The County has set the period of affordability at fifteen (15) years for its HOME Program under recapture.

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:

None

- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)).
- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(I)(2)(vii)). Note: Preferences cannot be administered in a manner that

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

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

See attachment

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

The CoC has established a Coordinated Assessment System Committee. This committee has met and based upon the HUD policy brief has established a pilot program that is being implemented by the Department of Social Services and Helping Hands (a private non-profit organization.) A homeless screening coordinated entry form is being used by both agencies.

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 recipient, having communicated and coordinated with the CoC concerning all the relevant points of services to be provided, performance standards, and policies and procedures for the operation and administration of the HMIS, will proceed to publicly and openly seek applications from all qualified nonprofit or municipal organizations who wish to provide services under the street outreach, homelessness prevention, rapid re-housing, and emergency shelter components of the FY24 allocation of Emergency Solutions Grant funds. Application informatoin will contain a description of all requirements placed on sub-recipients, which shall include policies on the provision of assessment for all persons seeking services, policies on eligibility of program participants, and how to determine when applicants meet homelessness or at-risk of homelessness guidelines established by HUD, policies on prioritizing the need of applicants for ESG services, policies on amount and length of time that financial assistance will be provided, a clear statement of the responsibility of sub-recipients to enter all client data in an HMIS—or alternate system for victim services providers—that has been approved by the Continuum of Care. Only nonprofit agencies will be eligible to receive sub-awards. An application format will be developed in which potential subaward recipients will be asked to present the services they are able to provide, the cost of such services and a budget for all program expenditures.

 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 County of Rockland CoC provides for the participation of a homeless individual on a policy making entity of the CoC. The CoC consults with a formerly homeless individual regarding decisions pertaining to the best uses of ESG funds.

5. Describe performance standards for evaluating ESG.

The Emergency Solutions Grant funding emphasizes Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-housing Assistance, Homeless Management Information System (HMIS) and 7.5% for Administrative Activities. Performance standards and outcome measures for emergency shelter and homelessness prevention and rapid re-housing activities should include, at least, the following:

Greater stability in housing

Increased self-sufficiency

Improved budget planning and financial management

ESG activities are also held to adhere with HUD data and technical standards and HUD performance thresholds. These include participant length of stay in the ESG program, percent of participants leaving emergency shelter (ES) for transitional housing (TH) or permanent housing, percent of participants leaving transitional housing for permanent housing, percent of participants leaving ES and/or TH with increased access to mainstream services, percent of participants in ES and/or TH leaving with employment, percent of participants in ES and/or TH leaving with increased income. All these measures are captured, followed over time, and analyzed using the Homeless Management Information System (HMIS).

Performance standards also include qualitative measures to aid in evaluation and to monitor progress during participant enrollment in ESG activities. These measures are captured within the case management efforts detailed in the HMIS.

Attachments

Citizen Participation Comments

	LocaliQ
New	York/New Jersey
	GANNETT

Account Number:	1184242
Customer Name:	Rockland County Of Comm. Deve
Customer Address:	Rockland County Of Comm. Deve 50 Sanatorium RD Comm. Development Pornona NY 10970-3555
Contact Name:	COMM. DEVELOPM ROCKLAND COUNTY OF
Contoct Phone:	
Contoct Emoil:	
PO Number:	

Print				
Product	#Insertions	Start - End	Category	
WJN Westchester Journal News	1	07/03/2024 - 07/03/2024	Public Notices	
WJN lohud.com	1	07/03/2024 - 07/03/2024	Public Notices	

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Order Confirmation Amount	\$795.90	
	Payment Amount by Credit Card	\$827.66
	Payment Amount by Cash/Check/ACH	\$795.90
As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save!	Cash/Check/ACH Discount	-\$31.76
	Service Fee 3.99%	\$31.76
	Tax Amount	\$0.00
	Total Cash Order Confirmation Amount Due	\$795.90

Date: Order Number: Prepayment Amount:

Column Count:	2.0000
Line Count:	207.0000
Height in Inches:	0.0000

Order Confirmation
Not an Invoice

06/27/2024

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\$ 0.00

Ad Preview		

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Grantee Unique Appendices

Rockland County Office of Community Development ESG Policies

I. **Program Description**

The Emergency Solutions Grant [ESG] program is covered generally by 24 CFR 576. ESG funds are awarded by HUD under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 ("HEARTH"). ESG has five program components: street outreach, emergency shelter, rapid rehousing, homelessness prevention and HMIS data collection. [Administration is not a component; it is an activity.]

II. Grant Terms

Grants will run for a 12-month period. Subrecipients must expend 100% of the funds granted by end of the 12th month in the Subrecipient Agreement. Funds that are not spent in a timely manner will be reallocated within the discretion of the RCOCD.

III. Description of ESG eligible programs

There are six categories of eligible activities for ESG funds. These eligible activities are intentionally focused on housing and are *not* intended to provide long term support for program participants.

1. <u>Street Outreach</u>

Activities that are designed to meet the immediate needs of unsheltered homeless people by connecting them with emergency shelter, housing and/or critical health services. Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care.

2. Emergency Shelter

<u>Renovation</u>: including major rehabilitation or conversion, of a building, to serve as an emergency shelter. The emergency shelter <u>must</u> be owned by a government entity or private nonprofit organization. The shelter <u>must</u> serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building.

Note: Property acquisition and new construction are **ineligible** ESG activities.

<u>Essential Services</u>: including case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

Shelter Operations: including maintenance, rent, repair, security, fuel, equipment,

insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual. See 24 CFR 576.102.

3. Homelessness Prevention

Housing relocation and stabilization services and short-term and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described by category 1 of the homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing. See 24 CFR 576.103

4. Rapid Re-Housing

Housing relocation and stabilization services and/or short-term and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. See 24 CFR 576.104

5. <u>Data Collection (HMIS)</u>

ESG funds may be used to pay for the costs of participating in and contributing to the Homeless Management Information System ("HMIS") designated by the Continuum of Care ("CoC") for the area. See 24 CFR 576.107

The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and subrecipients. Victim service providers cannot participate in HMIS. Legal services organizations may choose to opt out of HMIS. These providers must use a comparable database that produces unduplicated, aggregate reports, instead.

6. Administration

Up to 7.5 percent of a recipient's allocation can be used for administrative activities.

IV. Ineligible Activities

The following activities are prohibited:

- Acquisition of a facility for use as an emergency shelter for the homeless.
- Rehabilitation services such as preparation of work specifications, loan processing, or inspections.
- Renovation or conversion of buildings owned by primarily religious

organizations or entities. All services must be free from religious influences.

V. Target Population

What is homelessness for purposes of ESG?

<u>Category 1</u> -> Literally homeless: 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 (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

<u>Category 2</u> -> Imminent Risk of Homelessness: Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance.
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing.

<u>Category 3</u> -> Homeless under other Federal statutes: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under the other listed federal statutes.
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application.
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

<u>Category 4</u> -> Fleeing/ Attempting to Flee DV: Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence.
- Has no other residence; and lacks the resources or support networks to obtain other permanent housing.

The RCOCD ESG program is designed to meet the needs of those residents of Rockland County who "but for" this assistance will become or remain homeless. As the amount of funds granted to the County will not likely be enough to serve all persons at risk of homelessness, the RCOCD has prioritized funding the following components:

- Street Outreach Essential Services necessary to reach out to unsheltered homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care. Component services generally consist of engagement, case management, emergency health and mental health services and transportation.
- 2) Emergency Shelter shelter operations [Individuals and families who qualify as homeless under categories 1-4]. Funding for Emergency Shelter cannot exceed 60 percent of the county's fiscal year grant, or the amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.
- 3) Homelessness Prevention [Category 1 individuals and families OR extremely lowincome individuals and families with household incomes of at or below 30% of Area Median Income who qualify as homeless under Categories 2, 3 and 4 of HUD's Definition of Homelessness or any category of HUD's Definition of "At Risk of Homelessness" attached as *Exhibit 1*]
- Rapid Re-housing [Individuals and families who meet the definition of "homeless" who live in an emergency shelter or other place described in the definition provided by HUD]
- 5) Administration Up to 7.5% of a recipient's fiscal year grant can be used for administrative activities such as general management, oversight, coordination, and reporting on the program.

VI. Who gets ESG funds?

The RCOCD makes its ESG allocation available to units of general local government [UGLGs] (which must be members of its CD consortium) and private non-profit organizations.

Previous awards do not guarantee funds or serve as an indication of the level of funding for any subsequent years.

VII. Application Process

UGLGs and non-profits must apply according to the timeline provided for in the CDBG process. *See Exhibit 2*. To be considered for funding, applicants must submit an application that will be

scored according to guidelines set by the RCOCD. A minimum threshold score must be met in order to be considered for funding. Only complete applications will be considered. Only those applications that are consistent with the RCOCD Consolidated Plan and Annual Action Plan currently in effect will be considered for funding. Applicants can only submit one application under the allowable components (Street Outreach Homelessness Prevention, Rapid Rehousing, or Emergency Shelter).

RCOCD will accept applications on a rolling-basis based upon allocation of funds and ESG funds available. To be considered, applicants must meet the following criteria:

- The scope of services must be County based.
- The proposed program must be of direct benefit to homeless persons as defined above. Homeless prevention programs must benefit homeless persons or those at risk of becoming homeless.
- Applicants must be a legally incorporated non-profit organization or government entity and operational before submission.
- All submitted projects must be considered eligible activities under ESG as required by HUD regulations and should be planned for a maximum of twelve (12) months.
- Applicants must demonstrate adequate fiscal and management systems and legal certifications to implement the proposed project.
- Applicants must be able to demonstrate a minimum of twenty-four (24) months experience as of the application deadline.
- Applicants with past compliance and performance problems will not be considered for funding.
- Applicants must be available to serve all religious, race and ethnic groups in accordance with Title VI of the Civil Rights Act of 1964 and Section 109 of Title I of the Housing and community Development Act of 1974.
- Applicants must be represented at the County CoC monthly meetings on a regular and consistent basis.

Applicants must also provide the following specific documentation with their application:

- Proof of 501(c)(3) status and current IRS determination letter
- Proof of attendance at the annual pre-application meeting
- Proof of attendance at Fair Housing/AFFH training
- Certification of local approval (only for private, nonprofit organizations applying for emergency shelter component funds) 24 CFR §576.202.
- Evidence of a 100% match (cash or in-kind)
- Articles of Incorporation and Organization By-laws
- Annual Report with Financial Data
- Last Independent Audit, results and copy of management letter.
- Verification of insurance coverages. The County and RCOCD must be named as an

additional insured, and must include the endorsement page and the following language:

The County of Rockland, its employees, elected officials, agents, and affiliated Municipal entities as additional insured."

The Rockland County Office of Community Development will present to, and comments accepted from the Rockland County CoC. (24 CFR 576.400). Funding recommendations will then be reviewed and approved by the RCOCD. The RCOCD reserves the right to make all final funding decisions.

VIII. Roles and responsibilities of subrecipients

Once an application is approved, and the subrecipient agreement is executed, subrecipients are expected to comply with all applicable HUD and County regulations.

Subrecipients will be responsible for:

- Adhering to all program requirements as stated in 24 CFR 576
- Working cooperatively with RCOD staff in all stages of the grant process, including but not limited to:
 - o Site visits
 - Document requests
 - Any monitoring activities deemed necessary by either RCOCD or HUD
- Maintaining and consistently following written intake procedures to ensure that they are following the definition of homelessness within 24 CFR 576.2. The Rockland County CoC has developed a coordinated assessment system. Under 24 CFR 576.400(d) each ESG-funded program or project within the CoC's area must use that assessment system. However, a victim service provider may choose not to use the CoC's centralized or coordinated assessment system.
 - Applicants must establish written policies and procedures specific to recordkeeping and documenting eligibility assessments at intake and periodic re-evaluation; and
 - Program must maintain documentation on all households seeking assistance, even if determined to be ineligible (documentation must reflect why).
- Submitting HMIS or comparable database reports on a monthly basis.
- Adhering to RCOCD's reporting and monitoring requirements
- Coordinating with other targeted homeless services and connecting program participants to mainstream and other resources
 - Supportive services
 - Federal, State, local and private assistance [e.g., Medicaid, SNAP, WIC, etc.]

- Participating in training and coordination meetings
- Conforming to all fiscal accountability standards required by the RCOCD and by the Federal government (24 CFR 84)
- Making matching contributions (cash or in-kind) to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD 24 CFR 576.201(a)(1).
 - \circ $\,$ Matching contributions must be provided after the date that HUD signs the grant agreement.
 - Contributions used to match a previous ESG grant may not be used to match a subsequent grant.
 - Contributions that have been used or will be used as satisfying a matching requirement under another federal grant or award may not be used.
- Homeless participation (24 CFR 576.405): subrecipients must have not less than one homeless or formerly homeless individual on their board of directors or equivalent policy making entity. To the maximum extent practicable the subrecipient must involve homeless individuals and families in:
 - constructing, renovating, maintaining, and operating facilities assisted under ESG.
 - providing services assisted under ESG; and,
 - in providing services for occupants of facilities assisted under ESG.
- Evaluating program participant's eligibility every three (3) months for homelessness prevention and at least annually for rapid re-housing assistance. 24 CFR 576.401(b)
- Requiring those receiving homelessness prevention and rapid re-housing assistance to meet monthly with a case manager and to develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. 24 CFR 576.401(e)

IX. Terminating Assistance

If a program participant violates program requirements, the subrecipient may terminate assistance. Termination must be conducted in accordance with a formal process established by the subrecipient and must recognize the rights of the individuals affected. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination.
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant. 24 CFR 576.402(b).

Assistance should be terminated in only the *most severe* cases. Termination does not bar future

assistance.

X. Recordkeeping Requirements

Generally, the RCOCD and its subrecipients must maintain and follow written procedures for intake and must establish and maintain sufficient records to document whether ESG requirements are being met. RCOCD and its subrecipients are expected to be familiar with all aspects of the extensive HUD recordkeeping requirements enumerated under 24 CFR 576.500 and must make those records available for inspection and/or reproduction. The list includes the following:

- Documentation of homeless status 24 CFR 576.500(b)
- Documentation of at risk of homelessness status (homelessness prevention only) 24 CFR 576.500(c)
- Determinations of ineligibility 24 CFR 576.500(d)
- Annual income 24 CFR 576.500(e)
- Program participant records 24 CFR 576.500(f)
- Coordinated assessment system and procedures 24 CFR 576.500(g)
- Rental assistance agreements and payments 24 CFR 576.500(h)
- Utility Allowance 24 CFR 576.500(i)
- Shelter and housing standards 24 CFR 576.500(j) and 24 CFR 576.403
- Services and assistance provided 24 CFR 576.500(I)
- Coordination with CoC 24 CFR 576.500(m)HMIS 24 CFR 576.500(n)
- Matching funds 24 CFR 576.500(o)
- Conflicts of interest 24 CFR 576.500(p)
- Homeless participation 24 CFR 576.500(q)
- Faith based activities 24 CFR 576.500(r)
- Financial records 24 CFR 576.500(u)
- Subrecipient agreements, procurement contracts, payment requests 24 CFR 576.500(v)
- Other Federal requirements in 24 CFR 576.407 and 409 as applicable

XI. Eligible Costs

ESG is a <u>reimbursement-based</u> program. All subrecipients will only receive those grant funds that are substantiated by proof of eligible costs.

Street Outreach §576.101

Total amount of recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed 60% of the recipient's fiscal year's grant or the amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

Eligible costs:

- Engagement
- Case Management
- Emergency Health Services
- Emergency Mental Health Service
- Transportation
- Services for Special Populations

Rapid Re-Housing §576.104 and Homelessness Prevention §576.103

Rental Assistance	Housing Relocation and	Stabilization Services
Eligible costs:	Financial Assistance	Services Costs
 Short-term rental assistance 		
 Medium-term rental assistance 	Eligible costs:	Eligible costs:
Rental arrears	Rental Application Fees	 Housing Search and
	 Security Deposits 	Placement
**Rental assistance can be	 Last Month's Rent 	 Housing Stability
project-based, or tenant	Utility Deposits	Case Management
based.	Utility Payments	 Mediation
	Moving Costs	 Legal Services
	_	Credit Repair

Emergency Shelter §576.102

Total amount of recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed 60% of the recipient's fiscal year's grant or the amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

Essential Services	Renovation (also	Shelter Operations	Assistance Required
	includes Major		Under the Uniform
	Rehab		Relocation and Real
	and Conversion)		Property Acquisition
			Act of 1970 (URA)

Eligible costs: • Case management • Child Care • Education Services • Employment Assistance and Job Training • Outpatient Health Services • Legal Services • Life Skills Training • Mental Health Services • Substance Abuse Treatment Services • Transportation • Services for Snecial	Eligible costs: • Labor • Materials • Tools • Other costs for renovation including rehab or conversion)	Eligible costs: Maintenance Rent Security Fuel Equipment Insurance Utilities Food Furnishings Supplies necessary for shelter operation Hotel/Motel Vouchers	 <u>Eligible costs</u>: Relocation payments Other assistance to displaced persons
Services for Special Populations			

Administrative Activities §576.108

The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent

of the recipient's fiscal year grant

Eligible costs are broadly categorized as follows:

- General management, oversight, and coordination
- Training on ESG requirements
- Consolidated Plan

XII. Program Income

When ESG funds are returned to a subrecipient (e.g., rent deposits), those funds are considered program income. The subrecipient is expected to use those funds to serve another eligible client and comply with all ESG financial guidelines. In the event that program income cannot be used to serve another client, it must be returned to RCOCD.

XIII. Reallocation of Funds

In the event that RCOCD deems it appropriate to reallocate ESG funds, prospective grantees will be asked to submit an application for those additional funds based on the following criteria:

- Current expenditure rate.
- The applicant's ability to meet the 100% match.
- The applicant's standing with regard to HMIS, reporting and draw requests.

To qualify for reallocated funds, the applicant must have no outstanding issues as a result of an ESG desk audit, visit or monitoring review.

XIV. Conflicts of Interest

Subrecipients must keep records to demonstrate compliance with the conflicts of interest provision in 24 CFR 576.404, including a copy of their policy and records supporting any exceptions.

XV. Fair Housing

RCOCD is fully committed to the furtherance of fair housing. All subrecipients must comply with applicable fair housing requirements and must be able to articulate how they are addressing impediments to fair housing.

XVI. Shelter and Housing Standards Act

The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted with ESG funds and all housing occupied by program participants. 24 CFR 576.403. Any building for which ESG funds are used must meet state and local government safety and sanitation standards as applicable. Any emergency shelter must also meet the minimum safety, sanitation and privacy standards enumerated in 24 CFR 576.401(b)(1)-(11). ESG funds cannot be used to help a program participant move into housing that does not meet minimum habitability standards in 24 CFR 576.401(c)(1)-(10).

XVII. Open Records

All materials in applications for ESG are subject to the NYS Freedom of Information Law. Application materials may be accessed by members of the public.

XVIII. Additional Information/Program Assistance

All questions about the ESG Program should be directed to:

Rockland County Office of Community Development 50 Sanatorium Road, Building A, 6th Floor Pomona, NY 10970 845.364.3939 <u>RCOCD@co.rockland.ny.us</u>

More information about ESG regulations and guidelines may be found on the HUD website, at:

https://www.hudexchange.info

Grantee SF-424's and Certification(s)

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Applicant and Recipient Assurances and Certifications U.S. Department of Housing and Urban Development OMB Number: 2501-0017 Expirition Date: 01/31/2028

Instructions for the HUD-424-8 Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-8 or SF-424-0. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CHR §§ 1.5.3.116, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific divil rights assurances to be furnished consistent with those authorities and wis specify the form on which such assurances must be made. A failure to furnish of comply with the civil rights see rances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.6.3.115, 8.67, or 146.39.

By submitting this form, you are stalling that all essentions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

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1 Has the logal authority to apply for Fodoral assistance, has the institutional, managerial and financial capability (including hinds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized ing as its submission of the application, including these assistances and certifications, and authorized my as the official representative of the explication to act in connection as may be required.

2. Will administer the grant in compliance with Title VI of the Clvi Rights Act of 1564 (42 U.S.C 2000(d)) and implementing regulations (24 GFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national ongin, os excluded from participation in, be denied the benefits of, or otherwise be subject to deviand 204 under any program or activity that receives Forteral financial essistance OH if the applicant is a Federally recognized Indian tribe to its tribally designated housing entity, the autiject to the Indian Civit Rights Act (25 ULS 0, 1001-1303)

3. Will administer the grant in compliance will: Section 504 of the Rehabilitation Act of 19/3 (29 U S C, 794) as a mended, and implementing regulations at 24 CTR part 8, the American Disabilities Act (42 U S C, 63 (21 C) dilead), and implementing regulations at 26 CFR part 20 or 38 as applicable, and the Age Disc finiteston Act of 1975 (42 U S C (67 C)-17) as anothed, and implementing regulations at 26 CFR part 20 or 38 as applicable, and the Age Disc finiteston Act of 1975 (42 U S C (67 C)-17) as anothed, and implementing regulations at 24 CFR part 146 which legether provide memory parts in the United States at all on the grounds of disability or age to otherwise be subjected to discumination index any program or activity that race was Federal financial as stance: except if the grant program authorizes of units participation to designated populations. Ther the aspirant within the design and population

4 Will comply with the Fen Housing Art (42 U.S.C. 2601-18); as amended, and the implementing regulations of \$4 CPR part 100, which prohibit discrimination in rousing on the basis of rest, calor, relignin sex (including gender/dentity and sexual atentation), disability, familial status, or national organised will all mast vely fully familial status, or national organised will all mast vely fully in the ratio posting exception, applicant of this on under table or its instrumentality which Is excluded by statute from coverage does not make this certification; and further except if the grant program sufficience or finite participation to designate populations than the applicant will comply with the nondiscriptination requirements within the designated population.

 Will comply with all applicable Fodera nondiscrimination requirements, including those listed at 24. CFR §§ 5.105(s) and 5.106 as applicable.

6. Will comply with the acquisition and relocation requirements of the Uniform Receation Assistance and Real Property Acquisition Palicies Act of 1970, as amonded (42 U.S.C. 4501; and Implementing regulations at 49 CFR part 4 and, as applicable, Section 104(n) of the Housing and Community Development Act of 1974 (42 U.S.C. 5004(d)) and implementing regulations at 24 CFR part 42, subpart A.

 Will comply with the environmental requirements of the National Environmental Policy Act (42.0.5.C. 4321 et see .; and related Federal authorises prior to the commitment or extremulare of functe for property.

8. That no Federal appropriated funds have been paid, or will be paid, by or on other of the approach to any person for influence of any genous, an other of Congress, and other or congress, and other of Congress, and other of Congress, and other of Congress, in connection will the avaiding of this Endrata grant or to excendent were appropriated funds have or will be paid for influencing or alter pring to influence the personal for influencing or alter pring to influence the personal techt appropriated funds have or will be paid for influencing or alter pring to influence the personal techt appropriate funds have or will be paid for influencing or alter pring to influence the personal techt appropriate funds have or will be paid for influencing or alter pring to influence the personal techt appropriate funds have or will be paid for influencing or alter pring to influence the personal techt appropriate for any standard Forn-LLL. Discontre Form to Report Labbying Toertify that I shall require all actives the shall there (inducting excepting). Federally rectify and disclose acceptingly. Federally rectify power are excluded from coverage by the Ryrd Amendment, but State-recognized Indian (thes and TD) is obtained and or State law are not excluded from the alsulate owerage.

IvWe, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal anti/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§267, 1001, 1010, 1012, 1014; 31 U.S.C. §5729, 3802).

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FremHUD-424-8 (02-22)

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4545-000g Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-C042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET, SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Contain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duty authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- 2. Will give the awarding agency, the Comptrollor General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarting agency directives and will include a covenant in the tille of real property acquired in whole or in part with Federal assistance funds to assure non discrimination during the useful life of the project.
- Wr. comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and socifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agoncy.
- 7 Will establish satisguards to pruhity; employees from using fiber positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

Previous Fotion Usable

- Will comply with the Intergovernmental Personnal Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of mert systems for programs funded under one of the 19 atatutes or regulations specified in Appendix A of OPM's Standards for a Marit System of Personnel Administration (5 C F R 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4301 of seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Little VL of the Civil Right's Act of 1984 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1600, and 1665-1606), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handiceps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§0101-0107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (Pl., 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd 3 and 290 rd 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Givi Rights Act of 1966 (42 U.S.C §§3001 et seq.), as amended, relating to nondiscrimination in the sale reals) or financing of housing, (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is heing made; and (j) the requirements of any other nondisc/iminotion statue(s) which may apply to the application

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Standard Form (240 (Rev. 7-97) Prescribed by OMB Circular A-102

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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 81-640) which provide for fair and equitable treatment of pressure displaced or whose property is acquired as a reault of Fodoral and Indexidy assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Fedoral participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §§276c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protoction Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the folds cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1989 (PL 91-190) and Executive Order (CO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11790; (d) evaluation of food hazards in Foodplains in accordance with EO 11088; (c) assumes of project consistency with EO 11872; (f) U.S.C. §§1451; (f) assumes of project consistence of 1872; (f) assumes of project consistence of 1872; (f) assumes of project consistence of 1872; (f) assumes of project consistence of project consistence of 1872; (f) assumes of project consistence of 1872; (f) assumes of project consistence of 1872; (

Ecderal actions to State (Clean Air) implementation Plans under Section 176(b) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et ecq.); (g) protection of underground sources of drividing waterunder the Sale Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species. Act of 1973, as amended (P.L. 93-205).

- Will comply with the Wild and Spenic Rivers Act of 1958 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Vill assist the awarding agency in assuring compliance, with Section 106 of the National Historic Preservation Act of 1966, as emended (16 L S.C. §470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§400a-1 of seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A 133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other hederal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protoction Act (TVPA) of 2000, as amonded (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe terms of trafficking in periods during the period of time that the award is in effect (2) Proceing a commercial sex act during the period of time that the award is in effect or (3) Using toneed labor in the performance of the award or sub-awards under the award.

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Application for Federal Assista		
16. Congressional Districts Of:		
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17. Proposed Project:		
a. Start Eate: 07/61/2014	*b. End Llare: [35/33/2023]	
18. Estimated Funding (\$):		
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*b. Appleant	A.(3	
°c. Stata	0.02	
dioral	3.00	
'e Other	2,00	
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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number, 4040-2005 Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to avorage 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and reviewing the data needed, and completing and reviewing the collection of information. Send completing and reviewing the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden astimate and Budget, Paperwork Reductor (Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal autionity to apply for Fockral assistance, and the institutional, managerial and financial capability (including funda aufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to exemine all records, books, papers, or documents related to the assistance; and will ostablish a proper accounting system in accordance with generally accepted adcounting standards or agency directives.
- 3 Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the arte and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will induce a novempt, in the title of real property acquired in whole or in part with Federal assistance funds to assure notdiscrimination during the useful file of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate englishering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will knnish progressive reports and such other information as may be required by the assistance awareing agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the swarding opency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of corsonal or organizational conflict of interest, or presents' gain.
- Previous Edition Usable

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728 4760) relating to prescribed atandards of ment systems for programs funded under one of the 19 atatutes or regulations specified in Appendix A of OPM's Standards for a Ment System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 9 Will comply with the Lead-Based Paint Holeoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based point in construction or rehabilitation of residence structures.
- 10 Vill comply with all Foderal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the GMI Rights Act of 1984 (P.L. 88-352) which prohibits discrimination on the basis of race. color or national origin; (b) Title IX of the Education Amondments of 1972, as amended (20 U.S.C. §§1651 1633, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Art of 1973, as amended (29) U.S.C. \$794), which prohibing discrimination on the basis of handicaps: (d) the Age Disorimination Act of 1975, as amonded (42 U.S.C. §§0101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatmont Act of 1972 (PL, 92-255), as amended relating to nondearSmination on the basis of drug abuse (1) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 01-610) as amonded, relating to nondiscrimination on the basis of alcohol abuse or alcoholism. (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee. 3), as amended, relating to confidential ly of alcohol and drug abuse patient records; (h) Title Vill of line Civil Rights Act of 1908 (42 U.S.C. §§3601 et aeq.), ps smeaded, relating to nondiscrimination in the sale sental or tinancing of housing; (8 ony other nondisorimination provisions in the specific statue(s) under which application for Federal assistance is being made: and (i) the requirements of any other nondiscrimination stat. a(s) whic't may apply to the application

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Start and Horm 424D (Rev. 7 67) Freenhand by OVB Circular Art 02

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Rolocation Assistance and Real Property Acquisition Policies Act of 1070 (P L. 91-946) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally exsisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will compty with the provisions of the Hatch Act (6 U.S.C. §§1501-1508 and 7324 7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 270a-7), the Copeland Act (40 U.S.C. §276c and 19 U.S.C. §674), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subogreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1060 (P L. 01. 190) and Executive Order (EO) 11514; (b) not floation of violating facilities pursuant to ED 11738; (c) protection of wellands pursuant to ED 11090; (d) teathation of those hazards in floodplains in accordance with EO 11988; (d) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1461 et sec.); (f) conformity of

Federal actions to State (Clean Air) intplementation. Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 95-523); and, (h) protection of ondergenet species under the Encangered Species Act of 1973, as amended (P.L. 92-205).

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et sog.) related to protecting components or potential components of the national wild and scenic rivert system.
- Will assist the awarding agoncy in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, instammedied (15 U.S.C. §470), EO 11593 (identification and protection of historic properties) and the Archaectogical and Historic Preservation Act of 1974 (16 U.S.C. §5405a-1 et seq).
- 18 Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amandments of 1998 and OMB Circular No. A-133, 'Audits of States: Local Governments, and Non-Profit Organizations.'
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (1VPA) of 2000, as amonded (22-U.S.C. 7104) which prohibits grant award recipients of a sub-recipient from (1) Engaging in severie forms of trafficking in persons during the period of time that the award is in effect (2) Producing a commercial sex ad during the period of time that the award is in reflect or (3) Using forced labor in the performance of the award or subawards under the award.

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DATE SUBMITTED
Paliy

Applicant and Recipient Assurances and Certifications U.S. Department of Housing and Urban Development

Instructions for the HUD-424-B Assurances and Certifications

As cart of your application for HUD funding, you, as the official authorized to sign on benaff of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF 424-D or SF 424-D. The Responsible Civil Rights Official has specified the form for use for purposes of general compliance with 24 CFR §§ 1.5–3.115, 8.50, and 145.25, as applicable. The Responsible Civil Rights Official may require specifie of VI rights assurances with 24 CFR §§ 1.5–3.115, 8.50, and 145.25, as applicable. The Responsible Civil Rights Official may require specific of VI rights assurances to be furnished consistent with those authorities and will specify the form on which and: assurances must be thade. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to official compliance at 24 CFR §§ 1.4, 5.115, 9.57, or 145,39.

By submitting this form you are sisting that all assertions made in this form are true lacourate, and carrect.

As the duty representative of the applicant, I certify that the applicant:

:dier/	L	"First Name	tabai e				
Middle Name	2	di se di					
*Last Name	045	79302	8-92		5.40	0.000	1111
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	Traophilipa	*		7			

 Has the legal subtority to apply for Federal assistance, hes the institutional, managorial and financial capability (including funds to pay like non-Federal share of urogram costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and confrictions, and authorized moles the official representative of the application to act in connection with the application and to provide any add tional information as may berequired.

2. Will admin ster the grant in compliance with Title VI of the Civil Rights Act of 1984 (42 U.S.C. 2000(c)) and implementing regulations (24 CFR part 1), which provide that no parson in the United States shall, on the grounds of race color or national origin, be excluded from participation in, be denied the benefits of, or otherwise the subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized indian theor of its highlights Act (25 U.S.C. 1901).

3. Will administer the grant in compliance with Gradian S04 of the Rehabilitation Act of 1672 (29 U.S.C. 794), as emondori, and implementing regulations at 24 CPA part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CPA part 35 or 56, as applicable, and the Age Descrimination Act of 1876 (42 U.S.C. 610°-07) as amended, and implementing regulations at 24 CPA part 146 which togother provide that no parcent in the United States sincil, on the grounds of disability or age be actuated from participation in, be denied the benefits of, or otherwise the subjectate to discrimination under any program or activity that nece was Tederal financial asselstance; except if the grant arcgman sufforces or imits participation to doe graded populations that the applicant will comply with the mealission in ation requirements within the design ated population

4. Will comply with the Fait Housing Act (42 U.S.C. 2601 16), as smoothed, and the interventing regulations 6: 24. CFR part 10), which prohibit discontinuation in housing on the basis of nace color, religion, sex (no oding gender dentiliy and sexual crienteton), disability te mitial status, or networal origin and will of intervely furnet fair housing: except an spollos it which is a housing or its instrument. Allly which

is excluded by statule from coverage does not make this cost loadies; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

 Will comply with sill applicable Factoral nondiscrimination requirements, including flower listed at 24. CFR §§ 5.105(a) and 5.105 as applicable.

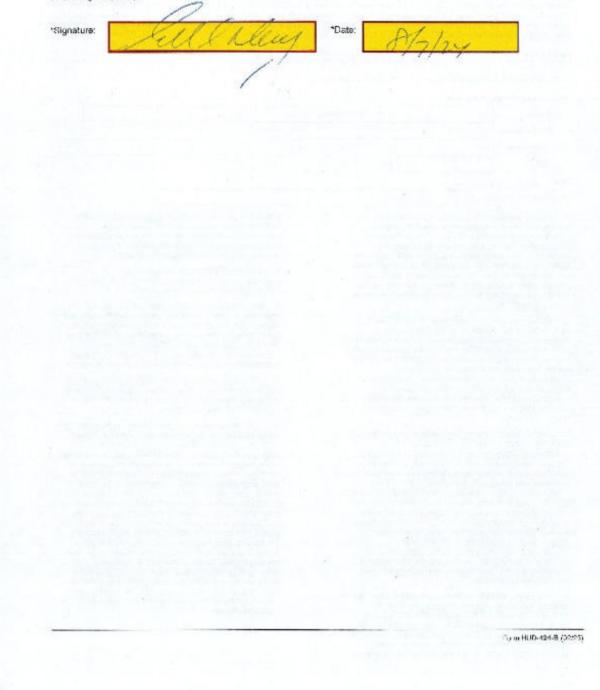
5. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Polytics Act of 1970 as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Sector 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5004(d)) and implementing regulations at 24 CFR part 42 Jubbas A.

 Will comply with the environmental requirements of the National Environmental Policy Act (42.0.5.0, 4321 et.eq.) and related Federa: authorities prior to the commitment or expenditure of funds for property.

That no Tederal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any personfor influencing or attempting to influence an afficer or employee of any agency, a Member of Congress, and officer or emoloyee of Congress, or en employed of a Member of Googress, in consistion with the awarding of this Fodora grant or its extension, renewal, amendment or modification. It hinds other than Federal appropriated funds have or will be baid for influencing or attempting is influence the persons Isted above, I shall complete and submit Standard Form-111, Disclosure Form to Report Loobying Theritfy that I shall require all subawards at all liers (including, sub-grants and contracts) to similarly contriby and disclose accordingly. Foders ty recognized Indian Tribes and tribully designated housing entities (TDPEs) established by Federally-recognized indian broas as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but Siste-recognized Incidnitities and 1 3Hs ostablished under State law are not exclused from the statute s coverade.

I/We, the undersigned, certify under penalty of parjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1801, 1818, 1012, 1014; 31 U.S.C. §3729, 3802).



CMB Number: 4040-0004 Expiration Date: 11/30/2025

Application for	Federal Assista	ince SF-424	
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State Use Only:			
E. Date Randied by	State	7. State Apolicatio	n blensten
8. APPLICANT INF	ORMATION:		
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d. Address:			
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Application for Federal Assistance SF-424
* 5. Type of Applicant 1: Select Applicant Type:
B: County Government
Type of Applicase 2: Swind Applicase Type:
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Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Fodorel Agency:
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11. Cetalog of Federal Domestic Assistance Number:
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13. Congelition Mentification Number:
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14. Areas Affected by Project (Cities, Counties, States, etc.):
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* 16. Descriptive Title of Applicant's Project
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15. Congressional Districts Of:		
'a Applicant 17	" b PrograngProject 17	
Attach an accitional 1st of Program/Pro	iest Congressional Districts if neeced.	
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17. Proposed Project:		
a. Start Date: 27/01/2024	*b Find Date: 0.672672325	
18. Estimated Funding (\$):		
's. Federal	715, 678.00	
*E. Applicant	£.00	
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*L. Program Income	0.00	
'a. TOTAL	227.678.00	
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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2025

Public reporting burdow for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget. Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Foderal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to chaure proper planning, management and completion of project described in this application.
- Will give the ewarding agoncy, the Comptroller General
 of Pio United States and, if appropriate, the State,
 the right to examine all recents, books, papers, or
 documents related to the assistance; and will establish
 a proper accounting system in accordance with
 generally accepted accounting standards or agency
 directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property tille or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the tifte of real property acquired in whole or in part with Federal assistance funds to assure rom-discrimination during the useful file of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5 Will provide and maintain completent and adequate engineering supervision at the construction site (n ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agoincy or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the approximate of personal or organizational conflict of interest, or personal yair.
- Previous Edilion Usable

- Will comply with the Intergovernmontal Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of meril systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Fedieral statutes relating to nondiscrimination. These include but are not limited to: (a) Title Vi of the Civil Rights Act of 1984 (P.L. 88-352) which prohibits discrimination on the basis of race. oxion or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. \$794), which prohibits discrimination on the basis of handicaps: (d) the Age Discrimination Act of 1975 lasamended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (o) the Orug Abuse Office and Treatment Act of 1972 (P L. 92-266), as amended relating to nondiscrimination on the basis of drug abuse, (f) the Comprehensive Alcohol Abuse and Alcoholiam Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism: (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U S.C. §§290 dd-3 and 200 ee 3), as smended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Righta Act of 1968 (42 U.S.C. §§3601 et req.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions to the specific statue(s) under which application for Federal assistance is being made; and (i) the requirements of any other nondisor mination statue(s) which may apply to the application.

Standard Form 424D (Rev. 7 97) Prescribed by OMB Citou at A-102

As likelized for Local Reproduction

- 11. Will comply, or has already complied, with the requirements of Tikes II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-640) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and fortheally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Vitil comply, as applicable, with the provisions of the Davis Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §5276c and 18 U.S.C. §874), and the Contract Wark Hours and Safety Standards Act (40 U.S.C. §§327-S33) regarding latent standards for federally-mointed construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protoction Act of 1973 (F.L. 93-234) which requires recipients in a special flood hazard area to panicipate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91 190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protoction of wellands pursuant to EO 117960; (r) evaluation of flood hazards in floodplatins in accordance with EO 11986; (d) assurance of project consistency with the approved Skale management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1461 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523), and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205)

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 of sog.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the avarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. \$470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. \$5478a 1 et seq).
- Will cause to be performed the required linancial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OME Circular No. A-133, "Audite of States, Local Governments, and Non-Profil Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commorbal sex act during the period of time that the award is in effect or (3) Using forced labor in the resolution and of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
All Mus	County Brechetta
APPLICANT ORGANIZATION	DATE SUDWIJKD
in may of RockLand	CTTL 47

SF-424D (Rev. 7-97) Back

Applicant and Recipient Assurances and Certifications U.S. Department of Housing and Urban Development

Instructions for the HUD-424-B Assurances and Certifications

As part of you: application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Givi Rights Official has specified this form for use for surpasses alignment compliance with 24 CFR §§ 1.5, 3.115, 6.50, and 146.25, as applicable. The Responsible C vill Rights Official may require specific dvill rights assurances to be furnished consistent with these euthorities and will specify the tam or which such assurances must be made. A failore to furnish or comply with the civil rights assurances cartained in this form may result in the specified use field and 24 CFR §§ 1.8, 2.115, 8.57, or 146.39.

By guarneting this form, you are stating that all assembliss made in this form are true, accurate, and correct.

As the duty representative of the applicant. I certify that the applicant:

Prefix.		*First Name.	Edwin	1041104-051	10.23	
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"Last Name:	Dey					
SJER						8.5
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 Has the legal authority to apply for Federal ossistance, less the institutional. Interegeral and Theatelal depathing uncertained in the set the non-Federal share of program despited in the application and the governing body has duly authorized the submission of the application including these assumances and certifications, and sufforzed me as the official representative of the application to act in connect on with the application and the provide any additional information as may be required.

2. Will administer the grant in compliance with T26 VI of the C VI Rights Act of 1064 (42 U.S C 2000(d) and realismenting regulations (24 CFR part 1), which provide that no below in the Unit26 States shall, on the grounds of rack, solar or netional origin, be excluded from participation in, be desired the banefits of, or otherwise be subject to discrimination under any program or actually that rackbes Hederal financial assistance CK if the approach is a Federally recognized Indian II be to its atbally designated housing entry. Is subject to the Indian Civil Rights Act (26 U.S.C. 1361-1300).

5. Will administer the grant in compliance with Section 004 of the Rehabilitation Act of 1872 (28 U.S.C. 734), as amended, and implementing regulations at 24 CFR part 6, the Antaniaan Deablities Act (49 U.S.C. 69 (1212) it stop), and implementing regulations at 28 CFR bart 35 or 36, as applicable, and the Age Destimitation Act of 1875 (42 U.S.C. 6105-07) as amended, and implementing regulations at 24 CFR part 146 will will be provide the integration in the UT tao States shall, on the grounds of disability or sgales are dued from participation in, be denice the benefits of, or otherwise be evolved to disability or significant or activity that records Hodoral Innancial assistance; excess if the grant program culturates to finitis participation to designated populations, then the applicant will comply with the nard isor remation requirements with the designated population.

4 Will comply with the Fair Housing Art (42 U.S.G. 2001-18), as an ended, and the implementing regulations at 24 CFR pat 100, which prohibit discrimination in housing on the basis of nach, obler, religion size (including gonder doubly and sexual orientation), disability, familiat subus, or nacional origin and will effort activity but rensely housing, except an applicable to nach addar to be an its instrumentality which

is excluded by statute from coverage coes not make this certification; and further except if the grant program authorizes or limits participation to designaled populations, then the applicant will comply with the production requirements within the designated population.

 Will comply with all approache Federal contraction nation requirements, including those listed at 24. CFR §§ 5.105(a) and 5.105 as applicable.

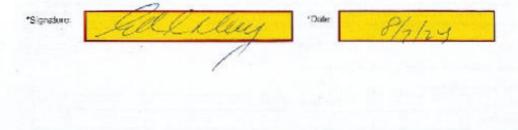
6. Will compty with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisicion Privides Act of 1970 as amended (42 U.S.C. 4601) and implementing regulations at 44 CFR part 24 and, as epollosible, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

7 Will comply with the environmental requirements of the National Environmental Policy Act (12 U.S.C. 1821 et.seq.) and release Hedera' authorities prior to the commitment or expenditure of funds for property.

That no Federal appropriated funds have been paid, or will be baid, by or on behalf of the applicant, to any personfor afficenoing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Fadors! grant or its extension, renewal, an endment of modification. If funds other than Recerct copropriated tunks have or with to paid for influencing or attempting to influence the persons listed above, I shall complete and et bruit Standard Form-LLL, Disclosure Yorm to Roport Lothying, Locitity that Lanal require all subawards at all liers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Trices and tribally designated nousing eraities (TDHEs) established by Fede ally recognized indian tribes as a result of the exercise of the tribe's severaigh power are excluded from severage by the Byid Ameridation, but State-recognized Indian bibes and TDHs established under State law are not excluded from the stature's coverage.

IWe, the undersigned, contrily under penalty of perjury that the information provided above is true and connect.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to oriminal and/or civil penaltics. Including confinement for up to 5 years, tines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 21 U.S.C. §§729, 3802).



FramHUD-424-8 (02/28)

HOME-ARP



HOME-ARP ALLOCATION PLAN

\$3,359,161

Ed Day, County Executive

Office of Community Development 50 Sanatorium Road, Building A, 6th Floor Pomona, New York 10970

845-364-3939

RCOCD@co.rockland.ny.us

http://rocklandgov.com/departments/community-development/

HOME-ARP Allocation Plan

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to "the ARP" mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), <u>before developing its HOME-ARP</u> <u>allocation plan</u>, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

Describe the consultation process including methods used and dates of consultation:

The County of Rockland engaged in a comprehensive consultation process with various stakeholders throughout the months of November/December 2022 and January/February 2023. During this time, the County engaged with various service providers serving each of the qualifying populations, including but not limited to: the Continuum of Care; Department of Social Services; Office for People with Disabilities; Center for Safety and Change; the Kaser, Nyack, Spring Valley, Ramapo and New Square Public Housing Authorities; and organizations addressing fair housing and civil rights. Consultation included virtual, telephonic, and in person interviews and email requests for information.

1

Each entity was provided with a synopsis of the HOME-ARP funding and qualifying populations, and was asked to provide feedback on the unmet needs, service gaps, and housing concerns of their clientele.

AGENCY	TYPE	METHOD	FEEDBACK	QPs
BRIDGES, Inc.	Nonprofit - Disability Services	Interview	There is a need for more housing for people with disabilities. Many individuals and families with disabilities are living in conditions that are unsafe due to their unique circumstances. There is a need for housing that is both affordable and accessible, as there is a correlation between low-income and disability status.	2,3,4 and veterans
CARES	Nonprofit - Service Provider	Interview	Unsheltered numbers are relatively low compared to other counties. The need is mainly for homelessness prevention, transitional and affordable housing more than emergency shelter. Maintenance of existing affordable units is also a priority. Upcoming expiration of housing funds (ESGCV, ERAP) will likely lead to increased need for homelessness prevention efforts.	1,2,3,4
Catholic Community Churches and Services	Nonprofit - Service Provider	Interview	A large portion of homeless individuals are Spanish-speaking single men. Most at-risk households are single parents with children.	1,2,3,4
Center for Safety and Change	Churches and Provider Services Center for Nonprofit – Safety and Service		In 2022, they had a total of 1846 clients who were survivors of various crimes, of which 1382 were DV survivors. Most clients reside in Rockland. Most clients require non-housing related support, such as therapy or immediate support through their hotline. For clients that require housing support, in 2022, 59 people were able to find shelter through the CSC. 251 adults and 90 children who requested shelter were NOT placed due to a lack of housing placement opportunities. CSC has a 15- bed shelter for immediate placement where DV survivors can stay up to 180 days, after which the CSC assists in finding transitional or permanent housing. They are then able to provide	3

List the organizations consulted:

			rental payment support for one year through a transitional housing grant. Because the CSC is a non-profit with limited capacity, they sometimes are not able to send rental payments before the first of the month. Meanwhile, some landlords have included a clause in their leases that imposes a fee if rent is paid late. This trend has become more popular since the pandemic took its toll on landlords. Landlords are hesitant to collaborate with the CSC because of fear that DV survivors will rekindle relationships with their former abusers, or enter new relationships that are also abusive. They do not want to engage with any issues associated with these types of relationships. All survivors would benefit from long-term supportive services such as therapy and other support. However, it is critical to ensure survivors and their children can re- engage with a community of their choice as soon as possible to restore a sense of normalcy. It can be counterproductive to healing for survivors to be in the same complex; accordingly, the need is for more options of affordable housing throughout the county, rather than a concentration of housing for DV survivors.	
Community Outreach Center	Nonprofit - Service Provider	Interview	There is a need for more affordable housing to be built within the Orthodox Jewish community. This community is by far the fastest-growing in the county.	2,4

Habitat for Humanity of Rockland, Inc	Nonprofit Developer – Affordable Housing	Interview	Even though Habitat is primarily in the homeownership sphere, due to the clientele they serve they see that the existing rental housing in Rockland County is simply unaffordable. This is what makes Habitat homes so appealing, because even with mortgage and taxes, the cost to the household is often far less than rent.	2,4
Hellman Property Management	Developer - Affordable Housing	Interview	Existing funding sources for affordable housing only work for developments over a certain size. Due to the availability of land and zoning allowances across the county, it is challenging to use these existing funding sources (e.g. LIHTC, etc.) to develop affordable housing at a smaller scale.	2,4
Interfaith Coalition for the Homeless	alition for Service		Most homeless individuals are male. Many are foreign-born and Spanish speaking. Many struggle with substance abuse issues, which prevents them from qualifying for government housing assistance. Because sobriety requires stability, this creates a chicken-and-egg scenario: a lack of stable housing exacerbates substance abuse challenges, while substance abuse challenges disqualify some individuals from government housing assistance.	1,2,3,4
Legal Services of the Hudson Valley	Hudson Service Provider		The lack of affordable housing is the most pressing area of need. Because of the types of cases LSHV handles, they also see a need for assistance with rental arrears. There is a real need for education and outreach to the entire community to make sure that people know what resources are available, and to communicate the countywide need for more housing.	1,2,3,4
Nanuet Family Resource Center	Nonprofit - Family and Child Services	Interview	There are many low-income, Spanish- speaking families in Nanuet school district. There is a need to formalize Single Room Occupancy housing to cater to families who live multi- generationally, or several families under one roof.	2,4

New Square Public Housing Authority	Public Housing Authority	Interview	PHA administers 650 Section 8 vouchers, all of which are used exclusively within New Square. The waitlist has 250 people on it.	2,4
Nyack Housing Authority Housing		Interview	Nyack Housing Authority is a high- functioning PHA in which many tenants are able to move on once they find jobs with higher income. At the same time, many people who increase their income find it beneficial to stay because 30% of income is still lower than most rents in the County. There is a need for financial literacy and other educational efforts in order to expose residents to possibilities and life goals outside of the complex.	2,4
Ramapo Public Housing Authority	Public Housing	Interview	Most Ramapo Section 8 vouchers are able to be used. This is likely because the majority of clients are within the Orthodox Jewish community, and there is more housing available in Ramapo than elsewhere in the county.	2,4
Rockland County Continuum of Care		Interview	The greatest challenge the CoC faces in meeting their mandate is the severe lack of housing, especially transitional housing. There is a serious need to increase development of affordable units in the county. While services are relatively robust, there is not enough funding for acquisition and construction of affordable housing. Rockland is also one of the fastest aging counties in the state.	1,2,3,4
Rockland Government County Department of Social Services		Interview	There is a severe gap in mental health assistance, especially for singles who need supportive housing. Many landlords no longer want to work with DS5 due to destruction of property by tenants. There has been an increase of substance use in recent years, especially amongst youth up to 25 years old. There is a need for more beds in rooming houses. There is also a need for more case workers.	1,2,4
Rockland County Department	Government	Interview	There is a severe gap in mental health assistance, especially for singles who need supportive housing. There is a	1,2,4

of Social Services			severe need for support and housing for undocumented residents. There is no overlap of service provision with the operating hours of the warming center.	
Rockland County Department of Social Services	Government	Interview	Need for affordable housing, specifically for single mothers with children. There is a need for housing for individuals and households with mental health needs. There is a need to increase flexibility around substance use recovery; relapse should not trigger a loss of housing or support.	1,2,4
Rockland County District Attorney	Government - Law Enforcement	Interview	The way NYS's human trafficking statute is drafted makes it difficult to prosecute many cases of suspected trafficking. Most victims of human trafficking and domestic violence are female, and are reluctant to come forward for prosecution. This is often due to fear of losing resources such as housing. A shortage of shelter within the County also makes it challenging for victims to come forward, because the alternative placements are often out of the county and result in disruption to families. Often the perpetrator of human trafficking maintains such a level of control over victims, and victims feel they cannot make it on their own. This is exacerbated by a lack of work skills and/or English proficiency, and the overall unaffordability of the County. Domestic violence service providers are stretched then, and intermediate resources are scarce. The data on human trafficking is difficult to collect, because many victims do not report. Domestic violence victims and human trafficking victims are often subject to the "economic handcuffs" of their persecutors, highlighting the need for more affordable housing to give victims the ability to break free of the abuse cycle.	3

Rockland County Human Rights Commission	Government - Civil Rights Agency	Interview	Housing discrimination complaints in Rockland County predominantly center on disability. Landlords are often unaware of federal and local law pertaining to disabled tenants' rights, and in particular their obligation to consider reasonable accommodations. The Commission is currently investigating 2 housing discrimination cases that include the basis of race, in addition to the bases of color, age and national origin. Although Rockland County Fair Housing Law also prohibits discrimination on the bases of creed, sex or gender, sexual orientation, ethnicity, alienage or citizenship status, marital status, familial status, military status, veteran status or status as a victim of domestic violence, the number of housing discrimination cases on these bases is zero. Landlords appear to be unaware that source of income discrimination (i.e. not renting to voucher holders) is against the law.	1,2,3,4
Rockland County Office for People with Disabilities	Government	Interview	When individuals with disabilities contact the Office for housing placement, there is nowhere to direct these individuals due to lengthy waiting lists for accessible developments. There is a need to increase disability funds to match inflation as many who rely on assistance increasingly struggle to meet the cost of living. There is a need to increase the frequency and effectiveness of transit for people with disabilities and seniors.	2,4

Rockland County Veteran's Service Agency	Government - Veteran's Agency	Email	Veterans have seen changing landlords/rising prices and cannot afford their rent/home anymore. Most of the veterans seeking services are in crisis because of chronic conditions (health, mental health, addiction), so many of these veterans would benefit from more housing for people with disabilities (whether that be service- connected health issues or from aging). Unfortunately, Rockland has limited affordable housing and this poses a severe issue for veterans—even if they qualify for the HUD VASH voucher. Rockland Homes for Heroes has 8 units for homeless veterans and is in the process of building more. Those 8 units are always full and there are always more veterans looking to live in Homes for Heroes. In the past two to three weeks there has been an uptick in veterans that earn too much money to qualify for any assistance but yet are not housed. Additionally, there has been an increase in homeless veterans/referrals. Two of those veterans were women, one with seven children. Any veteran with children poses a problem because the VA system does not have services for veterans with dependents and so therefore only local community resources are available for veterans with children.	2,4 and veterans
Rockland Housing Action Coalition, Inc.	Nonprofit Developer - Affordable Housing	Interview	Many tenants in the developments managed by RHAC have several families doubling up, with as many as 9 people in one bedroom. There is a perception that homelessness has increased in recent years. The few trespassers that continue to enter and sleep at RHAC complexes have mental health challenges, and the police do not have a strategy or anywhere to direct these individuals for support or housing. The key barriers to development are imposed by local government.	1,2,4

Rockland Housing Choice Voucher Team	Government	Interview	The need for housing choice vouchers far exceeds the availability of vouchers. When the waitlist was last opened in 2018 over 9000 people applied for 1000 positions. Housing options that meet the criteria of the program are limited and some landlords do not want to rent to voucher holders. Her department also offers a homeownership program but due to high operating costs participation rates in the program are very low.	2,4
Phyllis B. Frank Pride Center of Rockland County	Nonprofit – Service Provider/Civil Rights Agency	Email	The most pressing areas of need as it relates to housing and the LGBTQ+ community in Rockland County has two prongs. The first is the need year-round emergency housing that is safe for LGBTQ+ (and particularly Transgender and Non-Binary) people. This emergency housing should have a clear path to sustainable permanent housing using the housing first model and administered by agencies with a commitment to LGBTQ+ rights. The second is that there is a need for low- barrier affordable housing that is safe for LGBTQ+ people, including immigrants. This affordable housing must be located in desirable areas, close to transportation and employment. Housing stability is one of the top challenges expressed by Pride Center clients. Helping clients maintain stable housing, stabilizing clients' housing in emergencies, and providing rapid re-housing services absorb a great deal of staff time at the Pride Center. If money were no object, the Pride Center would build and operate youth emergency housing here in Rockland County that is safe for LGBTQ+ youth. The Pride Center would also initiate a housing first pilot program targeting LGBTQ+ adults and designed to increase community stability and prevent homelessness. It would provide rent assistance and wraparound services to five families for two years,	3,4

			using a nationally recognized model designed to lift people out of poverty permanently. The pilot would establish the effectiveness of this intervention in Rockland County and hopefully open opportunities to continue and expand it.	
Sisters of Charity	Nonprofit Developer - Affordable Housing	Interview	There is a need for more funding for acquisition and construction of affordable housing. Finding a site is another significant challenge due to limited land. On average, there is a need for approximately \$1m for predevelopment and acquisition assistance for any project.	2,4
Spring Valley Housing Authority	Public Housing	Interview	There is a serious need to increase housing supply across the county. Many people remain in Public Housing even after they can be independent because their communities are formed. There is very low turnover. Enforcement for various issues such as rental payment or property destruction is very difficult due to the lack of credibility of eviction proceedings. Many tenants have additional residents living with them whose income does not contribute to rent, though this trend is difficult to prove.	2,4

United Way	Nonprofit - Service Provider	Interview	The top housing needs based on 211 calls are housing-related, such as payment assistance and homelessness assistance. There are at least 1000 mostly male singles, many of whom are foreign-born and Spanish speaking with some level of immigration insecurity, living in overcrowded situations in Spring Valley alone.	1,2,4
Village of Kaser Public Housing Authority	Public Housing	Email	Kaser PHA has 92 vouchers and its waiting list is currently closed. There is a need for more affordable rental housing, particularly smaller units, with 2-3 bedrooms and more rental vouchers such as Section 8.	2,4
WestCOP	Nonprofit - Service Provider	Interview	WestCOP serves 3500 households (out of 7000 total) struggling with housing- related challenges including rental payments and evictions. 80% of them have language barriers and many are illiterate in their own language. There is no homeless shelter in Rockland County, and unhoused individuals are resistant to leaving the county to find shelter. County government should make their land available for affordable housing.	1,2,4

Summarize feedback received and results of upfront consultation with these entities:

All interviewees identified a severe lack of affordable rental housing units within the County. Additionally, there is a lack of accessible housing for individuals with disabilities and a lack of supportive housing units. The County remains one of the most severely cost-burdened in the State, with 47% of households spending more than 30% of household income on housing costs, and notably, 21% of households are severely cost burdened, spending more than 50% of household income on housing costs. People with mental/physical disabilities, racial/ethnic minorities, undocumented residents, single parents, people experiencing domestic violence were all identified as experiencing higher levels of housing insecurity and challenges obtaining and maintaining housing. Overall, the need for greater affordable rental housing inventory in the County was the prevalent theme of all feedback. While the need for permanent supportive housing in the County is clear, consultation with stakeholders showed that the lack of adequate rental housing supply or inventory makes the need for additional supportive services secondary.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- · The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- Date(s) of public notice: 2/5/2023
- Public comment period: start date 2/6/2023 end date 2/22/2023
- Date(s) of public hearing: 2/21/2023

Describe the public participation process:

Rockland County published a notice in The Journal News ("LoHud") informing the public of the availability of the HOME-ARP allocation plan, as well as the public hearing, on February 5, 2023. A copy of the notice and Plan were also made available on the County's website at http://rocklandgov.com/departments/community-development/. The Plan was available for at least a 15 day period, and the County conducted a public hearing on February 21, 2023. The public hearing was held in person at the Office of Community Development, with a virtual option. Comments on the Plan were accepted via US Mail, email to ROCCD@co.rockland.ny.us, telephone, or at the public hearing.

Describe efforts to broaden public participation:

The County offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing, either in person or virtually, were made available. The County circulated the draft allocation plan to the CoC as well as other stakeholder groups and municipalities to further encourage public comment.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

The Sisters of Charity Housing Development Corporation provided the following comment in writing: "The Sisters of Charity Housing Development Corporation believes that Rockland County's HOME ARP Allocation plan correctly addresses the desperate need for affordable housing development in the county. On average, there is a need for approximately \$1m for predevelopment and acquisition assistance for any project. Rockland County has one of the highest cost indicators in the state, with a ratio of median income to average sales price of 5.01(According to NYSHCR), and over 55% of its residents are rent-burdened (U.S census). Making these funds available for the development and predevelopment of affordable housing in the county is a necessary step in achieving the needs of the various communities, as well as the growth targets set forth by Governor Hochul's New York Housing Compact.

No comments or recommendations were received at public hearing.

Summarize any comments or recommendations not accepted and state the reasons why: Not applicable.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of <u>all four</u> of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

			Current	invento	iry		Homeless Population			
	Fam	nily	Adults	Only	Vets	TOTAL*	Family HH	Adult HH	Vets	Victims of
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds	(at least 1 child)	(w/o child)		DV
Emergency Shelter	38	13	5	NA	0	43				
Transitional Housing	0	0	30	NA	0	30				
Permanent Supportive Housing	41	13	46	13	0	87				
Other Permanent Housing*							40	3	1	15
Sheltered Homeless							6	51	2	0
Unsheltered Homeless							0	40	16	2

Emergency Shelter Point-in-Time Count 2022							
Organization Name	Project Name	PIT Count	Total Beds	Utilization Rate			
Catholic Charities Community Services of Rockland Inc.	The Inn Warming Center	33	54	61%			
Center for Safety & Change, Inc	Rockland Family Shelter (DV)	12	13	92%			
Loeb House Inc.	Take Five	0	2	0%			
Rockland County DSS	Emergency Housing	3	3	100%			
Rockland County DSS	Family Shelter	8	28	29%			
		Sum : 56					

	Transitional H Point-in-Time Co			
Organization Name	Project Name	PIT Count	Total Beds	Utilization Rate
	Men's Community			
Open Arms Inc.	Residence	6	18	33%
45 97. N	Women's Community		100	
Open Arms inc.	Residence	4	12	33%
		Sum : 10		
	Permanent Suppor Point-in-Time 2022			
Organization Name	Project Name	PIT Count	Total Beds	Utilization Rate
Loeb House Inc.	Fred Hecht Apartments	28	28	100%
Loeb House Inc.	Homes for Heroes	7	7	100%
LUCH HOUSE HIC.	Maggie Conway Rooming	-	-	10070
Loeb House Inc.	House	17	17	100%
Rockland County DSS	RCDSS PSH	26	26	100%
VA Hudson Valley	HUD VASH	9	9	100%
		Sum : 87		
Organization Name Center for Safety & Change,	Project Name	PIT Count	Total Beds	Utilization Rate
provide the second s	() of the contraction of the con	TH COULT		Guildennard
Inc	CSC - DV Rapid Rehousing	15	15	100%
Rockland County DSS	RC DSS - NYS ESG-CV RRH	2	2	100%
Rockland County DSS	RCDSS - RRH 1	23	23	100%
Rockland County DSS	STEHP RRH	2	2	100%
VA Hudson Valley	WestCOP - SSVF	1	1	100%
		Sum : 43	·	
	Unshelten Point-In-Time 2021**	Count		
Total Unsheltered			40 perso	ns
	Unsheltered PIT Subpopu	lation Informatic		
And the second	a service and a service of the servi		22	
Chronically Homeless Individ				
Chronically Homeless Individ Chronically Homeless Familie			0	
Chronically Homeless Familie Chronically Homeless Vets			0	
Chronically Homeless Familie Chronically Homeless Vets Chronically Homeless Youth	95		0 0 3	
Chronically Homeless Familie Chronically Homeless Vets Chronically Homeless Youth	95		0	
Chronically Homeless Familie Chronically Homeless Vets	es Illness		0 0 3	
Chronically Homeless Familie Chronically Homeless Vets Chronically Homeless Youth Adults with a Serious Mental	es Illness		0 0 3 10	

Housing Needs Inventory and Gap Analysis Table

Non-Homeless					
	Current Inventory	Level of Need	Gap Analysis		
	# of Units	# of Households	# of Households		
Total Rental Units	31847				
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4638				
Rental Units Affordable to HH at 50% AMI (Other Populations)	7971				
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8225			
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2985			
Current Gaps			1399		

However, the table above doesn't accurately and adequately represent the housing gap as intended. The primary issue is that the housing demand (level of need) as presented in the table only includes households with one or more severe housing problems. This ignores the fact that households at the same income level without a severe housing problem are still competing for the same housing units at that level of affordability. The consequence of this is an overrepresentation of the availability of housing units for households at-risk of homelessness.

The data below shows that there are 11,510 households with a household income at \leq 30% AMI, but only 4,638 housing units that are affordable at that income range. This means there is a deficiency of -6,872 units affordable to households at this income range. 8,225 (71%) of the 11,510 households earning \leq 30% AMI have at least one severe housing problem as defined by HUD. These households are at-risk of homelessness. With this information we can estimate that there is a deficiency of at least 4,876 housing units for households that are at-risk of homelessness (71% of the 6,872 gap).

Renter H	ouseholds Earning ≤30% AN	11
Number of Housing Units Affordable with an Income of ≤30% AMI (Current Inventory)	Number of Households With a Household Income of ≤30% AMI (Level of Need)	Gap
4,638	11,510	-6,872

Estimating housing gap for households that are At-Risk of Homelessness:

- Of the 11,510 households with a household income of ≤30% AMI, 8,225 (71%) have at least one severe housing problem.
- There is a deficiency of 6,872 housing units affordable to households at ≤30% AMI.
- 71% of 6,872 is 4,879
- Therefore, there is deficiency of about 4,879 housing units for households at-risk of homelessness.

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

- The 2022 Point-In-Time count from the Rockland County Continuum of Care found that there
 were 58 people in emergency shelter, 10 people in emergency shelter, and 40 unsheltered
 people. The 58 people in emergency shelter made up 47 households, 6 of the 47 households
 had at least one child in the household.
- The warming center sees 45-50 people each night, and 20-25 of those individuals come on a regular basis. In November 2022, 93 different individuals sought shelter at the warming center, and approximately 20 of those shelter seekers were undocumented.

	Number	Percent
Households	291	
Persons	366	
GENDER		
Female	94	31%
Male	213	69%
Transgender/Gender Non-Conforming	0	0%
RACE		
White	101	35%
Black	123	42%
Other Races	67	23%
OTHER		
Veteran	18	6%
Chronically Homeless	34	11%

From October 1, 2020-September 30, 2021 The CoC served a total of 366 persons.

Program	Persons Served
Emergency Shelter/Safe Haven/Transitional Housing	239
Rapid Re-Housing	46
Permanent Supportive Housing	83

- According to the FY2021 HMIS Annual Report, 166 households experienced homelessness for the first time during the reporting period.
- There are approximately 1000 people in temporary housing assistance through Rockland County DSS. 134 of those are substance abuse cases.

At Risk of Homelessness as defined in 24 CFR 91.5

- Of the 11,510 households with a household income of ≤30% AMI, 8,225 (71%) have at least one severe housing problem.
- 47% of Rockland County households are spending more than 30% of their household income on housing costs. This includes 21% of households that are severely cost burdened, spending half or more of their household income on housing costs.
- Based on HMI5 data for the period from 10/1/2020-9/30/2021, 53% of households exiting the system exited to temporary housing destinations. This may indicate a greatly likelihood of instability. Of households that exited to temporary situations, 23% returned within 730 days.
- According to the Ramapo Public Housing Authority, 500 individuals applied for the Project-Based Voucher program within one month of the application opening in August of 2019. Since then, only 65 have been placed in housing, and 435 remain on the waiting list. For their Section 8 waiting list, they received 3347 applications within a 2-week period in Spring of 2022.
- The County DSS housing coordinator reported that, of 70 clients who have received Emergency Housing Vouchers, 60 have not found placements due to lack of available units.
- Eviction Lab 2018 data shows that prior to Covid, Rockland County averaged 10 eviction filings per day, threatening an average of 2,900 households with eviction.
- Legal Services Corporation data collected since the pandemic showed that there have been 1,331 eviction filings since April 1, 2020. This is notable because during the COVID-19 pandemic, there was a state-wide moratorium on evictions from March 16, 2020-January 15, 2022. The table below demonstrates the monthly evictions filed, with a marked uptick in 2022.



Monthly Filings During the COVID-19 Pandomic

 Legal Services of the Hudson Valley, a provider of counsel to low-income individuals and families reported the following information about cases they have handled:

Legal Problem Code	2020 Cases Handled	2021 Cases Handled	2022 Cases Handled
61 Federally Subsidized Housing	15	19	28
62 Homeownership/Real Property (Not Foreclosure)	1	0	1
63 Private Landlord/Tenant	85	120	200
64 Public Housing	11	5	9
65 Mobile Homes	1	0	2
66 Housing Discrimination	1	2	2
67 Mortgage Foreclosures	10	6	10
68 Mortgage Predatory Lending/Practices	1	12	0
69 Other Housing	8	0	29
Grand Total	133	164	281

Legal Problem Code	2020 Cases Opened	2021 Cases Opened	2022 Cases Opened
61 Federally Subsidized Housing	11	14	16
62 Homeownership/Real Property (Not Foreclosure)	0	0	1
63 Private Landlord/Tenant	67	95	161
64 Public Housing	9	3	8
65 Mobile Homes	1	0	2
66 Housing Discrimination	0	1	2
67 Mortgage Foreclosures	7	5	6
68 Mortgage Predatory Lending/Practices	1	0	0
69 Other Housing	7	9	24
Grand Total	103	127	220

The data above indicate a marked upturn in the need for legal services related to housing since the expiration of COVID related eviction and foreclosure moratoria, putting these individuals and households at risk of homelessness.

 The United Way's <u>2020 ALICE report</u> (Asset Limited, Income Constrained, Employed) found that of 99,502 households, 41% of Rockland County households qualify below the ALICE threshold. While many of these ALICE households earn above the federal poverty level, they

still struggle to make ends meet and do not earn enough to afford basic household necessities. This makes them particularly vulnerable to eviction or other loss of housing stability.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

- According to the 2021 Point in Time Count, 2 individuals in the system were identified as survivors of domestic violence.
- According to the FY2021 HMIS Annual Report, 26 heads of household identified as domestic violence victims/survivors. Data on victims of human trafficking was not readily available in Rockland County.
- The Center for 5afety and Change, a nonprofit domestic violence service provider assisted 1382 domestic violence survivors in 2022.
- While data on human trafficking is not easily tracked or accessible, anecdotal evidence suggests that it is a regional issue. The County participates in New York State's Safe Harbour Program and has a core team of professionals who collaborate with the Rockland County Anti-Human Trafficking Task Force.
- In a 2018 News12 four part investigative journalism series entitled "Slavery in Suburbia: Sex Trafficking of Children Flourishing in the Hudson Valley," (https://westchester.news12.com/slavery-in-suburbia-sex-trafficking-of-children-flourishingin-the-hudson-valley-38003438), freedom of information requests to each of the 217 police departments in the region showed 1222 human trafficking incidents in a three year period. In Rockland County, the Town of Clarkstown was identified as a particular hot spot for trafficking because of easy access to major transportation routes.
- Equality Now's July 2020 report "Combating trafficking for sexual exploitation amidst the Covid-19 pandemic: lockdowns, online sexual abuse, & supporting survivors remotely" attributes a five year 846% increase in child sex trafficking to the growing use of the internet. 94% of victims of trafficking for sexual exploitation are women and girls. The pandemic heightened incidents of trafficking because it increased poverty, making victims more vulnerable, school closures prevented children from accessing their main source of shelter and nourishment, more children and young adults spent unsupervised time online for learning and socializing, leaving them vulnerable to online predators.
- A recent report from the <u>Polaris Project</u> indicates that traffickers frequently target individuals
 who lack strong support networks, are facing financial strains, have experienced violence in
 the past, or who are marginalized by society. LGBTQ youth face higher rates of discrimination,
 violence, and economic instability than their non-LGBTQ peers. When faced with fewer
 resources, employment opportunities, or social supports, LGBTQ youth who are away from
 home must find ways to meet their basic needs and may therefore enter the street economy,
 engaging in commercial sex to meet these needs.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

- Catholic Charities has 20-25 cases of homelessness prevention. 15-18 of those cases are single parents living off \$1000 per month. About half of all cases are undocumented residents. 1 or 2 cases are fleeing Domestic Violence.
- There is a severe lack of affordable and accessible housing for individuals with disabilities, physical and otherwise, who are independent and can live alone but require certain accommodations. There is a distinct need to develop housing that is both accessible and affordable. While there may be some accessible housing that is market rate, many individuals with disabilities are also low-income. According to local organizations working with the disabled (e.g. BRIDGES), wait lists for accessible developments can be between 2 and 5 years. In 2022, 365 people have approached BRIDGES for housing and shelter needs. At least 150 of those seeking accessible, affordable housing could not be placed by the organization due to a lack of available units. According to the Office for People with Disabilities, many individuals living on Disability payments are struggling more than ever with rental payments, as the cost of living has increased but their stipends have not risen to meet that increase.
- There is a severe lack of supportive housing for individuals with a need for more constant
 services and care, alongside a severe lack of mental health and addiction support services even
 for those who can live alone. There is a very strong correlation between homelessness, mental
 health, and addiction. For example, the Rockland Department of Social Services has a case load
 of 200-300 individuals per month who struggle with substance abuse and have unstable
 housing.
- There is a severe lack of affordable housing for single parents, mostly mothers with children. This population tends to live in overcrowded housing arrangements, as noted by family resource coordinators that work in school districts. In many cases, more than one family will live in the same apartment, where multiple members of one family will share one room. This is most prominent among Haitian and Latino communities
- According to the 2021 HMIS data, other populations requiring services to prevent homelessness were as follows:

Veteran Households	18
Disabled Households	164
Transgender/Gender Non-conforming	0

- HMIS data also showed that 36 people received rapid rehousing assistance, 15 of whom were Black or African American, or 42%, while 2 were Hispanic/Latino, or 6%. Of the 19 households served in Rapid Rehousing, 5% exited without permanent placement, 5% were still enrolled in Rapid Rehousing and not placed in permanent housing, and 63% of households in Rapid Rehousing who were placed in permanent housing but were still receiving Rapid Rehousing assistance.
- · Of 161 households that exited the system within six months, 16% returned within 180 days.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

- Rockland County offers a significant number of vouchers for emergency housing placement as well as Section 8 rental assistance.
- The Department of Social Services and nongovernmental agencies offer robust services such as food access and hygiene programs.
- Helping Hands offers a breakfast program where approximately 60 individuals come for a hot meal each morning.
- Catholic Charities runs the warming center from November through May and offers overnight support for homeless individuals during those months. The organization serves 500 households that are at-risk of homelessness through their food pantry.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

- Low-barrier, year-round shelter is not available in the County.
- All stakeholders consulted for this process expressed the same overwhelming need: affordable
 rental housing. The County has prioritized investment of its HOME funds in development of
 rental housing to expand the inventory of affordable rental units. However, many of those
 participating in consultations reported that even these units are not affordable to the
 extremely low-income populations. Further, there is increased competition for fewer
 affordable units.
- Special needs populations are frequently housed in poor quality units. Landlords establish
 screening criteria that create barriers for entering permanent
 housing (including references, minimum income requirements, credit scores). Combined with
 escalating rents and low vacancy rates, it is difficult for this population to move out of shelter
 and into permanent housing.
- According to stakeholders, transportation service needs exist for people experiencing homelessness to destinations besides medical appointments. While numerous service providers are available to provide mental health services in the County, their capacity to provide adequate levels of supportive services are strained due to staff shortages, staff burnout, and insufficient staff wages.

At Risk of Homelessness as defined in 24 CFR 91.5

Long waiting lists for public housing also indicate lack of affordable inventory for those who
require subsidized or other affordable housing options. Households in need of rental
assistance are at greater risk for homelessness as rents continue to skyrocket and housing
becomes increasingly unaffordable. Stakeholders also reported high rates of evictions among
households with pending emergency rental assistance applications, indicating both a great

need for additional rental assistance resources, as well as a large population of households that are facing eviction and considered at risk of homelessness.

- Stakeholders reported service gaps in connecting people discharging from treatment facilities to housing, identifying transitional housing/step-down housing as an unmet need and an effective model for populations discharging from institutional care. Services such as case management and other services during non-traditional hours (outside normal business hours) are not available but are needed.
- Service providers report that even with the existence of vouchers, many landlords do not want to rent to voucher holders. This is despite the fact that source of income-based housing discrimination is illegal under NYS and local fair housing laws.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

- The 2022 Point in Time Count shows that the Center for Safety and Change, which operates the County's domestic violence shelter is at a 92% utilization rate. This high percentage indicates a greater need for domestic violence beds within the County.
- The District Attorney's Office identified the need for more intermediate level assistance to this
 qualifying population, and particularly services for the LEP population, as well as assistance
 with navigating the complexities of bureaucracy to achieve greater independence from
 perpetrators.
- The Center for Safety and Change identified a need for greater need for permanent and transitional housing for domestic violence victims. In 2022, 251 adults and 90 children who requested shelter were not placed due to a lack of housing placement opportunities. All survivors would benefit from long term supportive services. Overall, there is a need for more options of affordable housing throughout the County.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

- Supportive housing for individuals with mental health challenges is currently at 100% utilization. This would indicate a need for greater mental health and supportive services.
- In addition to a lack of general inventory, service providers and not for profits report a lack of
 accessibility in units that are affordable for individuals with disabilities.
- Individuals with addiction issues struggle with finding housing that will not terminate due to relapse.
- Due to severe lack of inventory, households in this qualifying population making 31%-50% of AMI are in competition with a broad range of other income levels for available housing. This puts more pressure on the market, raising overall prices and increasing the likelihood of housing instability.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

- · There is no existing homeless shelter in Rockland County.
- There is a need to increase development of affordable housing in general, specifically for costburdened households, individuals with disability, and individuals who require supportive services, addiction support, and mental health care.
- The Continuum of Care would benefit from the presence of more affordable housing developers involved in shaping a plan to increase transitional and affordable housing.
- There is no MICA (Mentally III, Chemically Addicted) Housing in Rockland whatsoever.
- Most mobile service providers (mobile showers, Meals on Wheels, etc.) operate until 5 pm, and many are volunteer-based. Because the warming center is open in the evening, there is no scheduling overlap between services and the operational hours of the warming center
- According to the United Way, calls to 211 in 2022 indicated an increase in calls from individuals seeking housing assistance

	2018	2019	2020	2021	2022
Total Housing-Related Calls Placed to 211 (Rockland County)	416	198	313	276	491
REASON FOR CALLING 211:	2018	2019	2020	2021	2022
Rent Payment Assistance	42	28	84	66	109
Homeless Shelter	136	57	49	54	91
Electric Service Payment Assistance	85	15	54	42	68
Low Income/Subsidized Rental Housing	17	25	22	14	49
Housing Search Assistance	43	26	15	14	19

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

The County is not identifying characteristics at this time.

Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, rental housing that is affordable and accessible to individuals and households at 0-30% AMI is the priority need. Establishing an adequate supply of deeply subsidized housing for Qualifying Populations is a priority due to low inventory and escalating rental costs. Coupled with this is a priority for rental assistance and supportive services (including case management, legal services and homeless prevention services)

to assist the homeless to identify and access housing and become stably housed, as well as to prevent homelessness among households who are at greatest risk.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

In addition to stakeholder consultation and feedback, the following data sources were consulted to determine needs and gaps for HOME-ARP qualifying populations.

- Homeless Needs Inventory is gathered from the Point in Time Counts (2022) and the 2021 HMIS Annual Report from the Rockland County COC for the period from 10/1/2020-9/30/2021
- The Number of Housing Units Affordable at Household Income range (Current Inventory) is derived from a combination of data from the U.S. Census Bureau American Community Survey (ACS), and Area Median Income (AMI) calculations from HUD. The AMI from HUD was used to calculate the maximum affordable monthly cost of housing (no more than 30% of household income) for households with incomes at 30% AMI and 50% AMI. These affordable monthly costs were matched with an ACS table that provides the number of housing units by housing cost. The result is an estimate of the number of housing units that are affordable at each income range.
- The number of households at different income levels and households with severe housing
 problems are from HUD's Comprehensive Housing Affordability Strategy (CHAS) data
- The latest CHAS data release is for the year 2019. To ensure all the data in the analysis is from the same year, data from every data source is for the year 2019.
- United Way 2020 ALICE Report was consulted for additional information about families at risk of homelessness.
- News reports and anecdotal evidence on human trafficking were used to help determine the level of need and gaps related to that qualifying population.
- It is important to note that some data used to determine needs/gaps is not necessarily the most current. This can be attributed to the interruption in data collection posed by the COVID-19 pandemic. Many regularly conducted studies were postponed and have not yet resumed.

HOME-ARP Activities

Template:

Describe the method(s)that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The Rockland County Office of Community Development (RCOCD) will solicit proposals from developers seeking funding and/or other resources from RCOCD for the creation of affordable rental housing. The proposed activity, including the proposed qualifying population(s) to be served, will be evaluated in accordance with the County's HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be

considered. The County is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding.

Should the County establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review. Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by RCOCD staff. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

Describe whether the PJ will administer eligible activities directly:

The County will administer and oversee its eligible activities directly and will enter into HOME-ARP Agreements with developers of affordable rental housing projects.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The County will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. Template:

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0		
Acquisition and Development of Non- Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$ 2,519,370.75		
Non-Profit Operating	\$ 167,958.05	5%	5%
Non-Profit Capacity Building	\$ 167,958.05	5%	5%
Administration and Planning	\$ 503,874.15	15 %	15%
Total HOME ARP Allocation	\$ 3,359,161.00		

Use of HOME-ARP Funding

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The HOME-ARP budget was driven by the priority needs identified via stakeholder

consultation and data analysis. As one member of the CoC indicated, "how can you think about the mental health and other needs of vulnerable populations if they don't have a roof over their heads?" Accordingly, Rockland County has allocated 75% of its HOME-ARP funding for the development of affordable rental housing. An overall lack of affordable rental units was the most frequently identified unmet need among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The Office of Community Development is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all the qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

Rockland County intends to allocate 5% of its grant to nonprofit capacity building and 5% to nonprofit operating expenses to capitalize on the opportunity to build capacity among provider organizations and assist with operational expenses related to HOME-ARP funded activities. In light of the COVID-19 pandemic, housing related not-for-profits have indicated a need to re-establish capacity, as they have the subject matter expertise to provide new or additional services but lack adequate funding.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The affordable rental housing inventory in Rockland County is severely constrained, a challenge that existed prior to the COVID-19 pandemic and has only gotten worse. Prospective renters face increased competition for fewer affordable units throughout the County. There is very little affordable housing available for households experiencing homelessness or at risk of homelessness. DSS reports that despite the availability of rental vouchers, it is increasingly challenging to find permanent housing for clients due to lack of affordable inventory. Therefore, the County's emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the County.

HOME-ARP Production Housing Goals

Template

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

It is anticipated that in combination with other available funding sources, and in using the HUD HOME-ARP calculation worksheet, the County will be able to produce 15 affordable rental units for qualifying populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

It is anticipated that the County's HOME ARP funds will be used to create 15 new units affordable to qualifying populations. The County's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the County. Providing funds for rental housing production directly supports the advancement of that goal.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

"Prioritization. In the context of the coordinated entry process, HUD uses the term "Prioritization" to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are

implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice."

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population <u>if the limitation or preference is described in the PJ's HOME-ARP allocation plan</u>. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project: Rockland County does not intend to establish a preference for a qualifying population or subpopulation. All qualifying populations will be eligible to apply for units assisted with the County's HOME-ARP funds. If, in the future, the County determines that preferences should be established, the County will follow all applicable regulations to submit an amendment to this Allocation Plan.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis: No preferences will be established.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to
 persons with a specific disability only, if necessary, to provide effective housing, aid,
 benefit, or services that would be as effective as those provided to others in accordance
 with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or
 activity is necessary in its HOME-ARP allocation plan (based on the needs and gap
 identified by the PJ in its plan) to meet some greater need and to provide a specific
 benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that
 owners may only limit eligibility to a particular qualifying population or segment of the
 qualifying population if the limitation is described in the PJ's HOME-ARP allocation
 plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The County does not intend to limit eligibility to a particular qualifying population or specific subpopulation.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in

the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis: Rockland County does not intend to implement a limitation.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not Applicable.

HOME-ARP Refinancing Guidelines

Rockland County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

	В	С	D
1	2024 SCHEDULE A		
2	CDBG		\$2,681,924.00
3	Project		Amount
4	Aministration (20%)		\$536,385.00
5	Section 108 Loan		\$210,046.00
6	Environmental Reviews		<u>\$80,993.00</u>
7			\$827,424.00
8			\$1,854,500.00
9	Project	Municipality	Amount
10	Central Nyack Playground	Town of Clarkstown	\$296,500.00
11	Harry Reiss Park	Town of Ramapo	\$350,000.00
12	Curb and Sidewalk Program	Village of Haverstraw	\$275,000.00
13	Nyack Senior Center Improvements	Village of Nyack	\$300,000.00
14	Safe Street Community Phase V	Village of West Haverstraw	\$250,000.00
15	Affordable Housing	Habitat For Humanity	\$90,000.00
16			\$1,561,500.00
17			
18	Project	Not-for-Profit	Amount
19	After Care Program	Center for Safety and Change	\$25,000.00
	Chiku Awali African Dance, Arts & Culture	Chiku Awali African Dance, Arts & Culture	\$10,000.00
	Workplace Readiness Program	Community Outreach Center	\$20,000.00
_	Student Success Expansion Program	Dominican University New York	\$40,000.00
	English as a Second Language Classes	Finkelstein Memorial Library	\$18,000.00
_	After Hours Youth Enrichment Program	Haverstraw African American Connection	\$50,000.00
	Senior Support Services	Jewish Family Services	\$25,000.00
	Therapeutic Horticultural Sensory Progam for Older Adults	Meals on Wheels Rockland	\$10,000.00
-	Project Greens	Rockland Farm Alliance	\$25,000.00
_	Teens in Action	Rockland County YMCA	\$25,000.00
_	SCDHC Social Worker Position	Thorpe Village, Inc.	\$25,000.00
	Summer Enrichment Program	West Street Child Care Learning Center, Inc.	\$20,000.00
31	15% of grant \$402,288 - Limit for Public Services		\$293,000.00
32	15% of grant \$402,288 - Linne for Public Services		\$253,000.00
33	НОМЕ		\$924,567.00
34	Project	Not-for-Profit	4,507.00 Amount
35	-	NOC-IOI-FIOIIC	\$92,457.00
_	CHDO Reserve (15%)		\$138,685.00
37			\$231,142.00
38		Relation for Drainate \$200, 105,00	
39	Project	Balance for Projects \$693,425.00	#4E0.000.00
<u> </u>	Tenant Based Rental Assistance		\$150,000.00
41	Affordable Housing		\$543,425.00
42			\$693,425.00
43			#005
44	EMERGENCY SOLUTIONS GRANT (ESG)		\$225,628.00
45	Project		Amount
_	Administration (7.5%)		\$16,922.00
	Shelter Operation and Street Outreach (60% combined)	\$135,376 Maximum Allowable Funding	\$135,376.00
	Homeless Prevention and Rapid Rehousing		*~~ ~~ ~~
49	Rockland Elder & Vulnerable Population Civil Legal Service	Legal Services of the Hudson Valley	\$30,000.00
50			
51			
52			
53	Contract Agency - RHAC #562004 - \$75,000 (NOT CDBG - CTD)		