

Executive Summary

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

1. Introduction

Waukesha County and the HOME Consortium, which includes Jefferson, Ozaukee, Washington, and Waukesha Counties, have prepared this 2017 Annual Plan to detail specific activities to carry out the 2015—2019 Consolidated Plan’s priorities and goals. This Plan outlines priorities by which the County’s Community Development Block Grant (CDBG) Program and the HOME Consortium’s HOME Investment Partnership (HOME) Program funds will be used over the next year. It provides guidance on the investment of HUD dollars, as well as other federal, State, and local funding dollars.

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.

Strategic priorities identified in this Consolidated Plan are identified below:

Housing

- *Housing Rehabilitation* Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs.*Housing Affordability* Support the development of affordable rental and owned housing, including projects located near job centers that will be affordable to service employees and other low-wage members of the workforce. Support homeownership opportunities for households throughout the HOME Consortium through downpayment assistance.*Homelessness & Homelessness Prevention* Assist persons who are homeless through the development and rehabilitation of transitional and permanent housing. Assist households at risk of homelessness with short-term rental payment and other assistance.

Public Services

- Fund projects that provide supportive services to low and moderate income household as well as persons with special needs, specifically including transportation assistance to low income households.
- Fund projects that provide supportive services and shelter to persons who are homeless.

- Support efforts to develop a social service collaborative to coordinate the work of social service organizations, disseminate news and information, and eliminate duplication of effort.

Public Facility & Infrastructure Improvements

- *Public Facility Improvements* Fund public facility improvements that benefit low income households and persons, and persons with special needs to include senior centers, neighborhood facilities, youth centers, childcare centers, health facilities, handicapped centers, homeless facilities, abused and neglected children facilities, parks to include community gardens, recreational facilities, and other facilities not listed here. *Infrastructure Improvements* Fund non-housing community development proposals that eliminate a threat to public health and safety to include water/sewer improvements, flood /drainage improvements, sidewalks, street improvements including streetscaping, sidewalks, and lighting, beautification projects/tree planting, and other improvements not listed here.

Economic Development

- Provide assistance to businesses to create and/or retain jobs for low and moderate income persons.
- Support business development in mixed-use environments with access to affordable and/or accessible housing.

Neighborhood Revitalization Strategy Areas (NRSAs)

- Provide focused funding to the three NRSAs within the City of Waukesha. Encourage a mix of strategies for revitalization in the NRSAs including economic development, housing development, public services, and facilities improvements

3. Evaluation of past performance

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

Each year, Waukesha County and the HOME Consortium reports progress in meeting the five-year and annual goals in a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD within ninety (90) days after the start of the new program year. Copies of the most recent CAPER are available for review at the Waukesha County Community Development Division. Waukesha County consistently meets its goals and priorities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen participation was achieved through several methods during the development of the Annual Plan. Citizens are always welcome to attend the monthly HOME and CDBG Board meetings, which are posted and public, and have an agenda item for a public comment period.

On May 11 and 12, the CDBG Board met in a public meeting to review applications for funding, and to listen to agencies document need in the community. On June 8, the CDBG Board met in a public meeting to approve the draft allocation for 2017 CDBG funds. On May 19, 2016, the HOME Board met in a public meeting to hear public comments and approve a draft allocation for the 2017 HOME funds.

Waukesha County held a 30 day public comment period (June 14—July 15, 2016) to obtain public comments relating to community needs and funding priorities for the year 2017 annual allocations. The public comment period and public hearing date were posted on the community development website and published in the local paper. The public hearing was held June 22, 2016. The CDBG Board met July 13 in a public meeting to review comments and finalize the 2017 CDBG funding. The HOME Board met July 21 in a public meeting to review comments and finalize 2017 HOME funding.

Waukesha County completed a draft of the Annual Action Plan narrative and posted the Plan for citizen comments on the County website and published the notice in the local paper. The thirty day comment period was held from September 20 to October 19, 2016. A public hearing was held on October 13, 2016. No comments were received. When the 2017 actual allocation amounts were released by HUD in June 2017, Waukesha County revised its numbers in the Annual Plan to reflect the change, and held a 15 day public comment period from July 5 to July 20, 2017. No comments were received.

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.

No public comments were received for the 2017 allocation or Annual Plan.

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

No public comments were received for the 2017 allocation or Annual Plan.

7. Summary

Waukesha County was allocated \$1,314,094 in CDBG funds and \$1,015,788 in HOME funds for FY2017. This grant award represents a fairly stable level of funding from 2016 (\$3,774 less in CDBG and \$45,083 less in HOME funding). In addition to the grant award, Waukesha County anticipates the receipt of \$355,000 in CDBG program income and \$157,000 in HOME program year from repayment of loans made using funds from each program. The allocation of the 2017 funds is consistent with the goals and objectives identified in the Five Year Consolidated Plan.

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
Lead Agency	WAUKESHA COUNTY	
CDBG Administrator		
HOME Administrator		
ESG Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source. The Waukesha County Department of Parks and Land Use – Community Development Division administers CDBG funds for Waukesha County and is the lead agency for the HOME Consortium, which includes Jefferson, Ozaukee, Washington, and Waukesha Counties.

Consolidated Plan Public Contact Information

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

1. Introduction

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))

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.

Waukesha County participates in a Continuum of Care called the Housing Action Coalition (a local continua that is part of the Balance of State Continuum of Care) that seeks to address and meet the needs of homeless populations through the provision of permanent, transitional, and emergency housing, supportive services, and methods to accurately capture the number of homeless individuals. Waukesha County does not receive or manage the ESG funds—the Housing Action Coalition is the recipient of ESG. However, many agencies that meet the needs of homeless populations receive CDBG funding, including emergency shelters, shelters for women and families, organizations that provide food and nutritional assistance, agencies that provide case management and supportive services, and health and medication assistance. The Community Action Coalition for South Central Wisconsin, Inc. (CAC) and the Supportive Services for Veteran Families (SSVF) programs operate in Waukesha and Jefferson Counties and supply services, such as, assistance obtaining shelter, health care, transportation, child care, and other veteran benefits to homeless veterans and their families. Stakeholders report limited homeless shelter facilities, Jefferson, Ozaukee, and Washington Counties having only one homeless shelter, and vouchers for motel assistance being extremely limited and fiscally inadequate. Several stakeholders reported that waiting lists for shelter and voucher services were limited and that space openings prioritization of first come first serve often mean that the most needy do not receive assistance in a timely fashion.

Waukesha County utilizes its network of public sector, private sector, and non-profit organizations to implement the strategic plan and coordinate efforts of the COC. In 2017, Waukesha County will diligently work to overcome gaps in the institutional structure and delivery system by

- Monitoring the count of homeless and chronically homeless residents and planning for ongoing service provision based on need, as an active participant in the Housing Action Coalition (Waukesha County Continuum of Care).

- Continuing as a lead member of the Thriving Waukesha Initiative, whose main purpose is to facilitate training and capacity building for non-profit organizations.
- Monitoring programs to identify inefficiencies, improve performance, and ensure compliance with applicable regulations.
- Encouraging collaboration among agencies to eliminate duplicative services and better serve residents, especially low- and moderate-income households, the homeless, and special needs population.
- Working with the Housing Action Coalition to create a permanent solution to the overflow shelter needs in the winter, which will include committing CDBG funding to this solution.

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 Community Development Manager is the County Executive's appointee to the Board of Directors for the Housing Action Coalition (the local continua that is a part of the Balance of State Continuum of Care). As such, Waukesha County is represented in the decision making for ESG funds, and helps to oversee the management of those funds, including developing performance standards, monitoring, and evaluating outcomes.

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	WAUKESHA COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

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

Efforts were made to include as broad a group of community stakeholders as possible. No agency types were excluded from participation.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Housing Action Coalition	The goals of the Waukesha County Continuum of Care are in line with the PJ's Consolidated and Annual Plans, particularly regarding ways to deal with homelessness and to create permanent rental housing.
A Regional Housing Plan for Southeastern Wisconsin	Southeastern Wisconsin Regional Planning Commission (SWRPC)	Both the Regional Plan and the Strategic Plan address the need for affordable housing, particularly near job centers.
Comprehensive Development Plan for Waukesha County	Waukesha County Department of Parks and Land Use	The Comprehensive Development Plan and the Strategic Plan both address housing, community development, and economic development needs in the County. The Comprehensive Development Plan also incorporates housing recommendations from SWRPC's Regional Housing Plan with the intent of encouraging affordable housing development in Waukesha County.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

Citizen participation was achieved through several methods during the development of the Annual Plan. Citizens are always welcome to attend the monthly HOME and CDBG Board meetings, which are posted and public, and have an agenda item for a public comment period.

On May 19, 2016, the HOME Board met in a public meeting to approve a draft allocation for the 2017 HOME funds. On June 8, 2016, the CDBG Board met in a public meeting to approve the draft allocation for the 2017 CDBG funds.

Waukesha County held a 30 day public comment period (June 14—July 13, 2016) to obtain public comments relating to community needs and funding priorities for the year 2017 annual allocations. The public comment period and public hearing date were posted on the community development website and published in the local paper. The public hearing was held June 22, 2016.

Waukesha County completed a draft of the Annual Action Plan narrative and posted the Plan for citizen comments on the County website and published the notice in the local paper. The thirty day comment period was held from September 20 to October 19, 2016. A public hearing was held on October 13, 2016. When the 2017 actual allocation amounts were released by HUD in June 2017, Waukesha County revised its numbers in the Annual Plan to reflect the change, and held a 15 day public comment period from July 5 to July 20, 2017. No comments were received.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	No comments received.	N/A	N/A	
2	Public comment period	Non-targeted/broad community	No comments received.	N/A	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The 5-year Consolidated Plan for 2015 – 2019 identifies the federal, state, local, and private resources expected to be available to Waukesha County to address priority needs and specific objectives identified in the Strategic Plan. The County is a direct entitlement community for the following HUD-funded programs: the Community Development Block Grant (CDBG) Program and the HOME Investment Partnership

(HOME) Program. Below is a breakdown of these anticipated funding resources for Year 3 of the Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,314,094	355,000	0	1,669,094	5,370,480	In 2016, the County's CDBG allocation was increased by less than 1%. In 2017 Waukesha County received a slight decrease of \$3,774.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,015,788	157,000	0	1,172,788	3,443,379	In 2016, the County's HOME allocation was increased by 10%. In 2017, the allocation for HOME funds was decreased by \$45,083. The County will continue to provide affordable housing options throughout the Consortium.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	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

Due to the strategic decision-making reflected in the allocations for 2017, the County anticipates leveraging other public and private investments for a higher return on investment. The County rarely fully funds any program or project, instead it requires leverage ranging from 1:1 in program service dollars, to 3:1 in economic development loans, to a typical 10:1 or larger ratio for housing development. Program income funds generated during this Action Plan period will be leveraged to increase services to low and moderate residents within the jurisdiction.

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

Waukesha County does not intend to address the needs identified in this plan with publically owned land or property located with the Jurisdiction.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless	2015	2019	Homeless		Services	CDBG: \$219,600	Homeless Person Overnight Shelter: 488 Persons Assisted Homelessness Prevention: 1200 Persons Assisted
2	Housing Rehabilitation/Zero Interest Loans	2015	2019	Affordable Housing		Housing	CDBG: \$253,800 HOME: \$700,000	Homeowner Housing Rehabilitated: 43 Household Housing Unit Direct Financial Assistance to Homebuyers: 75 Households Assisted
3	Public Improvement	2015	2019	Non-Housing Community Development		Public Facility & Infrastructure Improvements	CDBG: \$7,226	
4	Public Services	2015	2019	Non-Homeless Special Needs		Services	CDBG: \$167,700	Public service activities other than Low/Moderate Income Housing Benefit: 2727 Persons Assisted HIV/AIDS Housing Operations: 15 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Non-Homeless Special Needs	2015	2019	Non-Homeless Special Needs		Services	CDBG: \$31,075	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
6	Public Facilities and Improvements	2015	2019	Non-Housing Community Development		Public Facility & Infrastructure Improvements	CDBG: \$663,998	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 50 Beds
7	Planning and Administration	2015	2019	Planning and Administration		CDBG Program Administration	CDBG: \$291,000 HOME: \$106,087	
8	Fair Housing Services	2015	2019	Fair Housing Services		CDBG Program Administration	CDBG: \$13,000	
9	Special Economic Development	2015	2019	Non-Housing Community Development		Economic Development	CDBG: \$434,946	Facade treatment/business building rehabilitation: 13 Business Jobs created/retained: 31 Jobs Businesses assisted: 95 Businesses Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless
	Goal Description	
2	Goal Name	Housing Rehabilitation/Zero Interest Loans
	Goal Description	
3	Goal Name	Public Improvement
	Goal Description	
4	Goal Name	Public Services
	Goal Description	
5	Goal Name	Non-Homeless Special Needs
	Goal Description	
6	Goal Name	Public Facilities and Improvements
	Goal Description	The CDBG Board reallocated \$600,000 from the Economic Development Revolving Loan Fund (RLF) to be used for acquisition and/or rehabilitation of a public facility "one stop shop for homelessness," which would include a co-location site for homeless services providers and a permanent solution for the overflow homeless population in winter and during excessive heat in summer. The goal is to have the site owned and operated by a nonprofit organization, and to serve the continuum of homeless individuals and families.

7	Goal Name	Planning and Administration
	Goal Description	
8	Goal Name	Fair Housing Services
	Goal Description	
9	Goal Name	Special Economic Development
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

The County will undertake activities that will address priority needs and objectives established as adopted by the Waukesha County Community Development Block Grant (CDBG) and HOME Boards. Section AP-38 provides a summary of proposed activities including local objectives and priority needs, proposed accomplishments, and a target date for completion.

Projects

#	Project Name
1	Administration
2	Housing
3	NRSA - Neighborhood Revitalization Strategy Areas
4	Public Services - Non NRSA
5	Public Facilities
6	Economic Development

Table 7 - Project Information

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

For the Annual Action Plan, the results of citizen input strongly supported homeownership and housing stock rehabilitation as well as social and supportive services for low to moderate income individuals and families. The County has maintained a broad priority of encouraging new homeownership, preserving existing homeownership, increasing economic development, enhancing public services, and public facility improvements.

AP-38 Project Summary
Project Summary Information

1	Project Name	Administration
	Target Area	PHOENIX HEIGHTS
	Goals Supported	Housing Rehabilitation/Zero Interest Loans Planning and Administration Fair Housing Services Special Economic Development
	Needs Addressed	Housing Economic Development Neighborhood Revitalization Strategy Areas (NRSAs) CDBG Program Administration
	Funding	:
	Description	2017 Administration
	Target Date	12/31/2017
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	<p>Waukesha County: General administration functions for Waukesha County to run the HOME and CDBG programs for the County and the HOME Consortium.</p> <p>Metropolitan Milwaukee Fair Housing: Promote equal access to housing for all people in Waukesha County through the provision of comprehensive fair housing enforcement and education services.</p> <p>UW Extension - Phoenix Heights: Develop a diverse planning team of stakeholders to update the Phoenix Heights Neighborhood Revitalization Strategy Area 5-year Strategic Plan.</p> <p>WI Partnership for Housing Development - Housing Rehabilitation: This program provides no interest loans to LMI owners of single family housing in Waukesha County, and small grants to households where home modifications designed to improve accessibility will allow individuals to remain in their home.</p> <p>WI Partnership for Housing Development - HOME Administration: Funding to administer the HOME Consortium's DPA, Rehab and Purchase-Rehab programs.</p> <p>Milwaukee Economic Development Corporation (MEDC) - RLF Admin: Funding to administer the revolving loan fund.</p>
2	Project Name	Housing
	Target Area	
	Goals Supported	Housing Rehabilitation/Zero Interest Loans
	Needs Addressed	Housing
	Funding	:
	Description	2017 Housing
	Target Date	12/31/2017
	Estimate the number and type of families that will benefit from the proposed activities	<p>For CDBG: 14 low income homebuyer rehab loans and 255 low-to-moderated income families will be provided housing counseling and/or attend homebuyer education workshops.</p> <p>For HOME: 60 homebuyers will buy homes with downpayment assistance, 17 homeowners will be provide homeowner rehab loans, 10 homebuyers will use the purchase-rehab program, and between 4 and 8 units of permanent housing will be developed using CHDO or housing development funding.</p>

	Location Description	County-wide for CDBG. HOME is available in the 4-county Consortium of Jefferson, Ozaukee, Washington, and Waukesha.
	Planned Activities	<p>CDBG: City of Waukesha: Landmark Paint/Repair Description: Financial and administration/design assistance to owners of qualified historic properties for the care and repair/restoration of the homes.</p> <p>CDBG:Housing Resources Inc: Homebuyer Education & Counseling Description:Homebuyer education and counseling program for first-time homebuyers in Waukesha County. The primary target populations assisted are low and moderate income and other underserved populations.</p> <p>CDBG and HOME: WI Partnership: Housing Rehabilitation Description:This program provides no interest loans to LMI owners of single family housing, and small grants to households where home modifications designed to improve accessibility will allow individuals to remain in their home.</p> <p>HOME:WI Partnership: Downpayment Assistance Description: This program provides forgivable loans to LMI homebuyers in the HOME Consortium area.</p> <p>HOME: WI Partnership: Purchase Rehab Program Description: Combines the DPA and Rehab programs for those homes that need work to be up to code immediately after closing.</p> <p>Habitat for Humanity: Acquisition/Rehab Description: Acquisition and rehab of one or two single-family homes in a NRSA and subsequently sold to a low-to-moderate income family.</p>
3	Project Name	NRSA - Neighborhood Revitalization Strategy Areas
	Target Area	HAERTEL FIELD PHOENIX HEIGHTS WESTSIDE NRSA
	Goals Supported	Public Services
	Needs Addressed	Neighborhood Revitalization Strategy Areas (NRSAs)
	Funding	:
	Description	2017 NRSA
	Target Date	12/31/2017

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2260 low-to-moderate income people
	Location Description	Activities will be undertaken in the City of Waukesha, in the three designated NRSAs; Phoenix Heights, Haertel Field and the Westside NRSA.
	Planned Activities	<p>Hope Center - Meal Program</p> <p>The Salvation Army - Meal Program</p> <p>The Caring Place, Inc - Meals on Wheels</p> <p>Family Service Agency of Waukesha - The C.A.R.E. Center</p> <p>The Women's Center - Children's Sexual Abuse Counseling</p> <p>Parent's Place - Community Education Program</p> <p>The Women's Center - Transitional Living Case Management</p> <p>La Casa de Esperanza - Early Childhood Education</p> <p>Waukesha County Community Dental Clinic - Adult Dental Program</p> <p>St. Joseph's Medical Clinic - Prescription Payment Assistance</p> <p>Literacy Council - Full Literacy Outreach</p> <p>Waukesha County Community Dental Clinic - Healthy Smiles for Tots & Teens</p> <p>180* Juvenile Diversion - Creating Lasting Families</p> <p>Waukesha County Community Art Project - After School Art Project</p>
4	Project Name	Public Services - Non NRSA
	Target Area	
	Goals Supported	Homeless Public Services Non-Homeless Special Needs
	Needs Addressed	Services
	Funding	:
	Description	2017 Public Services
	Target Date	12/31/2017

	Estimate the number and type of families that will benefit from the proposed activities	4430 low-to-moderate income families
	Location Description	County-wide
	Planned Activities	City of Waukesha - Adaptive Recreation City of Waukesha - Sentinel Park Summer Program City of Waukesha - Saratoga/Haertel Field Summer Program City of Waukesha - Senior Activity Coordinator City of Waukesha - Homeless Services The Women's Center - Emergency Shelter Salvation Army - Emergency Lodge Hope Center, Inc. - Day Center Seniors on the Go - Vehicle Replacement Oconomowoc Silver Streak - Vehicle Replacement Lake Area Free Clinic - Medication Assistance Interfaith Senior Programs - Support Services for Seniors Interfaith Senior Programs - Transportation Collaborative Hebron House of Hospitality - Emergency Shelter Food Pantry of Waukesha County - Special Diet Program Lake Area Free Clinic - Dental Clinic Richard's Place - HIV/AIDS Supportive Housing
5	Project Name	Public Facilities
	Target Area	
	Goals Supported	Homeless Public Improvement Public Facilities and Improvements
	Needs Addressed	Public Facility & Infrastructure Improvements
	Funding	:
	Description	2017 Public Facilities
	Target Date	12/31/2017

	Estimate the number and type of families that will benefit from the proposed activities	6 Public Facility activities will be completed to benefit low-to-moderate income families and persons with disabilities. (\$184,015) 1 homeless services center will be acquired and/or rehabilitated, providing a co-location site for nonprofit homeless services providers, and a permanent solution to winter overflow homeless shelter needs. (\$600,000)
	Location Description	Various locations throughout the City of Waukesha and S42W31800 Depot Rd., Town of Genesee
	Planned Activities	City of Waukesha - Cemetery Sidewalk Repairs City of Waukesha - ADA Sentinel Park Town of Genesee - Interactive Disability Pad ARCH - Parking Lot Restoration UW Waukesha Foundation - ADA Compliance for Field Station Easter Seals - Adult Day Building Improvements TBD - Homeless Services Center
6	Project Name	Economic Development
	Target Area	
	Goals Supported	Special Economic Development
	Needs Addressed	Economic Development
	Funding	:
	Description	2017 Economic Development
	Target Date	12/31/2017
	Estimate the number and type of families that will benefit from the proposed activities	13 businesses are estimated to be assisted with their facades, 95 businesses will be provided technical assistance and counseling, and 31 jobs are expected to be created.
	Location Description	Jobs will be created and facades improved in various locations in Waukesha County.

Planned Activities	City of Waukesha - Facade Program City of Waukesha - Wayfinding Signs City of Waukesha - Small Business Grants UW Extension - Small Business Retention WWBIC - Business Owner Milwaukee Economic Development Corporation - Revolving Loan Fund Administration
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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

Geographic Distribution

Geographic Distribution

Target Area	Percentage of Funds
HAERTEL FIELD	
PHOENIX HEIGHTS	
WESTSIDE NRSA	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Affordable housing and community development needs are present in areas throughout Waukesha County and the HOME Consortium. CDBG funds for direct benefit categories are allocated based on the percentage of LMI persons within the LMA neighborhoods. Regarding the Public Services category of the CDBG funds, the proposed projects will focus on the basic needs of the residents such as healthcare, transit services, essential and supportive services, as well as housing services. Special populations such as seniors, homeless, and youth will continue to receive funding for healthcare, child care, nutrition, education, shelter support and recreational needs. Funding will continue for targeted efforts in the Neighborhood Revitalization Strategy Areas. The County will also provide a portion of its allocation to the City of Waukesha, as shown in the table above.

HOME funds will be distributed based on the income eligibility of clients throughout the four-county HOME Consortium.

Neighborhood Revitalization Strategy Areas (NRSAs)

Waukesha County identified three NRSAs in the City of Waukesha in 1999 – Phoenix Heights, Haertel Field, and West Side, as shown in the maps on the following pages. The County will continue to prioritize the three NRSAs for funding and community development efforts during 2016. Up to 10% of the total CDBG allocation is targeted toward Community Based Development Organizations (CBDOs) who concentrate their services in one of these three areas. Economic development is the highest priority for funding in the NRSAs, including services that assist low and moderate income families in finding and maintaining jobs.

Strategies for all of the NRSAs include the following economic development and neighborhood

revitalization initiatives:

- Connecting residents to job training and education resources;
- Linking families to neighborhood resources that support sustained employment;
- Housing revitalization and homeownership;
- Crime prevention; and
- Resident empowerment.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	330
Non-Homeless	120
Special-Needs	300
Total	750

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	43
Acquisition of Existing Units	75
Total	123

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Waukesha County and the HOME Consortium anticipate supporting 750 households with affordable housing over the next year. Homeless facilities including the Salvation Army Emergency Lodge, Jeremy House, and the Heron House Emergency Shelter are projected to assist 330 homeless individuals or families in Waukesha County. Special needs housing providers are projected to support 300 individuals or families in Waukesha County, including victims of domestic violence, persons with HIV/AIDS, and seniors or disabled adults in need of housing support services. Note that emergency shelters for domestic violence victims are included in the special needs category and not the homeless category to prevent double counting households supported by these facilities.

Affordable housing for non-homeless households is projected to assist 138 households in the HOME Consortium area. Approximately 43 of these households will be supported via rehab of existing units through the HOME purchase and housing rehabilitation programs, WI Partnership housing rehab program (17 households), and the City of Waukesha housing rehab and homeowner loan programs (combined total of 16 households). Through the HOME program, an estimated 5 new units will be produced by a CHDO and 60 households will be assisted in acquiring homes using the downpayment

assistance program.

AP-60 Public Housing – 91.220(h)

Introduction

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

The public housing authorities in the HOME Consortium will continue to provide affordable housing options for residents during this Action Plan period to the greatest extent possible. However it must be noted the authorities have extensive waiting lists and will continue to monitor expenditure of funds to maximize the number of families currently being served.

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

The housing authorities for Waukesha, Jefferson and Washington each have resident counsels to ensure resident involvement in the housing authority's decision-making process. The Waukesha County Housing Authority also has a Family Self Sufficiency program that assists families to become economically and socially independent. The program provides the following services: job training, educational, child care, medical or mental health services, transportation, life skills, legal information, emergency services, and housing services. Families are also provided information to assist in their quest to transition from subsidized housing to eventual homeownership. The FSS program provides financial incentives through an escrow saving account for continual participation and investment in the program.

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

No PHA in the HOME Consortium has been designated as troubled in 2016.

Discussion

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

Introduction

Waukesha County is a participant in the Wisconsin Balance of State Continuum of Care Committee on Homelessness. The WIBOSCOC conducts the point-in-time count twice per year in January and July. This count is intended to include persons that are homeless and are living in emergency shelters, transitional housing, safe havens for the homeless, domestic violence shelters, or who are unsheltered living on the streets or any other place not mean for human habitation.

Data provided by the WIBOSCOC shows that the total homeless population in Waukesha County during the January 2015 PIT count was 174. Washington County had 64, Jefferson County had 60, and Ozaukee County had 12 total homeless people, either sheltered or unsheltered, in January 2015. The numbers have been consistent for the last three years in Ozaukee and Washington Counties, but have increased each year in Jefferson and Washington Counties.

Data provided by the WIBOSCOC shows that a total of 32 homeless persons were counted as chronically homeless in the Counties of Jefferson, Ozaukee, Waukesha and Washington during the January 2015 point-in-time counts. As of the January 2015 PIT, one chronically homeless person made up .4% of the total sheltered/unsheltered population in Jefferson; 31 chronically homeless persons comprised 4.8% of the sheltered/unsheltered population in Waukesha County. No chronically homeless persons were counted in Ozaukee or Washington Counties in the January PIT count.

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

The Wisconsin Balance of State Continuum of Care (WBOSCoC) reached out to homeless persons (especially unsheltered persons) through soup kitchens, day programs, drop in centers, and hospitals. In addition, information is collected annually using the Point in Time survey form and is then summarized. The Point in Time surveys are one on one interviews are also held with the consumers. Additionally, outreach teams regularly go under bridges, visit camps, and go to other known homeless areas to tend to the needs of the homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

Waukesha County will continue to provide financial assistance to nonprofit agencies to develop and implement a coordinated assessment system throughout the jurisdiction. Waukesha County funds all of the emergency shelters in the County through the CDBG program, and is an active member in the Housing Action Coalition. In addition, in 2017, the CDBG Board has reallocated \$600,000 from the

Economic Development Revolving Loan Fund to Public Facilities, for the acquisition and/or rehabilitation of a homeless services center, which will provide a "one stop shop" for homelessness. The Board envisions this center as being owned and operated by a nonprofit organization, and will offer co-location opportunities for nonprofit homeless service providers, and a permanent solution to the overflow homeless needs of individuals and families during the winter and the excessive heat in the summer.

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

Waukesha County will continue to support homeless service providers, funders, and stakeholders who recognize the need to shift focus and resources from short-term, emergency shelter to long-term, permanent housing, in order to end homelessness. Waukesha County and the Housing Action Coalition support the adoption of the Housing First model by all shelter, transitional and permanent housing providers.

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.

Waukesha County will continue to support the Wisconsin Balance of State Continuum of Care Regional Plan to End Homelessness by:

- Supporting non-profit organizations that provide affordable housing opportunities for low- and moderate-income individuals and families.
- Providing CDBG funds for programs that help maintain the County's housing stock, and enable low-income individuals to stay in their homes through the Home-Owner Rehabilitation program.
- Advocating to secure funding for homeless programs and participates in policy development through the Wisconsin Balance of State Continuum of Care.

The CoC has outlined its discharge policy for assisting persons aging out of foster care, and being

released from health care facilities, mental health facilities, and correction facilities.

Discussion

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

Introduction:

Barriers to affordable housing can present in a variety of aspects and multiple entities including, but not limited to government and political agencies, banking and finance institutions, insurance industry regulations, zoning regulations, social and economic variables, neighborhood conditions, public policy legislation, and fair housing enforcement. Sections MA 40 and SP 55 describe barriers to affordable housing within Waukesha County and the Consortium in greater detail. This section will describe specific strategies Waukesha County will employ to address barriers to affordable housing.

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

As indicated in section SP-55, Waukesha County participated in and adopted the Regional Housing Plan recommendations. Waukesha County will continue to work with government, public, private, and nonprofit community agencies to remove or ameliorate the negative effects of public policies that serve as current barriers to affordable housing. Action steps as recommended and accepted by the County are summarized below:

Waukesha County will work to implement the various recommendations from the Regional Housing Plan adopted into the Waukesha County Comprehensive Development Plan. Specifically, the County will work with local municipalities which provide municipal services to encourage that comprehensive neighborhood plans and zoning ordinances/regulations encourage a variety of housing types including single and multi-family homes, apartments, townhomes, duplexes, and live-work units. This year and for the remainder of the Consolidated Plan period, the County will seek strategies, as appropriate, to evaluate standards and processes to determine if amendments could be made to reduce of housing to residents without reducing safety, functionality, or aesthetic quality.

The CDBG Office will evaluate the extent to which County programs and services meet the needs of populations with limited English proficiency by conducting the four-factor analysis.

Waukesha County will evaluate the extent to which housing counseling is available to provide credit repair advice to members of the protected classes and to low- and moderate-income residents, in order to ensure that to the maximum extent possible, residents have access to means of improving their ability to obtain and maintain decent, affordable housing. In the case that counseling is unavailable, inadequate or not well advertised, Waukesha County should work with its community partners to increase its availability and use.

Waukesha County will support education and outreach efforts by community partners regarding needs

assessments for affordable housing and subsidized housing.

Waukesha County will encourage neighborhood development plans, zoning ordinances, and regulations that encourage a variety of housing types, lot sizes, and housing values in order to encourage housing affordability.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

To help remove obstacles to meeting underserved needs and improve service delivery, Waukesha County supports the continued development of the Housing Action Coalition, a collaborative to coordinate the work of social service organizations, disseminate news and information, eliminate duplication of effort, and spearhead community-wide solutions to local needs. Waukesha County will also continue to use CDBG funds for taxi services in order to ensure that residents without private transportation are able to access social service providers.

Actions planned to foster and maintain affordable housing

Waukesha County and the HOME Consortium will continue to offer their core programs, including purchase rehab, homeowner rehab, and downpayment assistance, in order to maintain housing affordability. The County will also set aside 15% of HOME funds to support development of affordable housing by a local CHDO.

In addition to specific programs designed to foster and maintain affordable housing, the County will also encourage participating jurisdictions to review their zoning ordinances for prospective barriers to affordable housing development, and to make amendments as needed. Waukesha County has adopted less restrictive zoning regulations based on SEWRPC's *Regional Housing Analysis* and has adopted the housing recommendations of that document into the Housing Element of the Comprehensive Plan.

Actions planned to reduce lead-based paint hazards

Waukesha County will continue to promote lead based paint inspections and, if a hazard is found, remediation. This action will both reduce lead exposure risks and help to maintain the County's older, lower- and moderately-priced housing. Any housing rehabilitation activities conducted using HOME or CDBG funds will continue to be monitored closely for any potential lead exposure. Waukesha County will also continue to work with the health departments of other Consortium counties to identify possible units with lead based paint hazards.

Actions planned to reduce the number of poverty-level families

Waukesha County will continued to address poverty through its economic development efforts that provide assistance to companies that create low and moderate income jobs and offer small business development programs. Homeless service providers will continue to offer job search and resume assistance. A focus on improving the jobs/housing balance in existing and emerging job centers will aim

to help poverty-level families access more employment opportunities, while potentially lowering transportation and housing costs.

Actions planned to develop institutional structure

Waukesha County has been receiving HUD grant funds for a number of years and has developed a robust administrative structure to manage its CDBG and HOME funds. The County's Community Development Division also offers seminars for potential subrecipients, CHDOs, and contractors to learn more about the CDBG and HOME programs. In addition to working with organizations, the County's Citizen Participation process is designed to make engaged and informed citizens another vital part of the institutional structure.

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

Waukesha County is a founding member of the Thriving Waukesha County Alliance, whose goals include the development of a more sustainable and comprehensive plan for addressing homelessness. Recommendations emerging from the Thriving Waukesha effort which will help enhance coordination include a community outreach and education campaign to provide information about resources available through homeless prevention programs; development of a lead agency to work with homelessness prevention and intervention agencies to produce information for provider networks; and establish a backbone agency that can plan, oversee, and coordinate homeless assistance across the community.

Waukesha County is an active participant in the local Continuum of Care, known as the Housing Action Coalition, which has undergone a transition in 2016. The HAC (a collection of nonprofit organizations focused on homelessness issues) is now the "backbone agency" with a new Board of Directors, hired staff, and a mission to bring the community together around affordable housing and homelessness. Waukesha County has been an active member of the steering committee driving this change, and has continued to take an active role through 2016, both in terms of leadership and funding.

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 income. Specify the years covered that include this Annual Action Plan.	0.00%

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:

N/A

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 HOME Consortium's Policy and Procedure Manual requires that, for homebuyer activities, the participating jurisdiction (PJ) must impose long-term affordability through resale or recapture provisions:

- Resale ensures that units assisted with HOME funds remain affordable throughout the affordability period. If a unit is sold during the affordability, it must be sold to another low-income homebuyer at an affordable sales price, while also providing a "fair return" for the original homebuyer. The period of affordability is based on the total HOME assistance in the project including direct assistance and development assistance to an owner, developer or sponsor.
 - Recapture allows the PJ to recapture all or a portion of the HOME subsidy in a property that is sold or transferred during the affordability period, and subsequently reinvested in other HOME eligible activities. The amount subject to recapture and the affordability period is based on the amount of direct assistance to the homebuyer. The HOME Consortium usually uses the Recapture provision.
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 HOME Consortium's Down Payment Assistance (DPA) program outlines the following resale/recapture provisions in its Homebuyer Grant Agreement:

- Grantee shall be entitled to retain such funds provided the Grantee remains in both ownership and occupancy of the mortgaged premises for a period of five (5) years. In the event the Grantee terminates either ownership or occupancy of the premises within five (5) years, Grantee shall be required to reimburse the HOME Consortium an amount equal to the grant amount less a deduction equal to twenty percent (20%) thereof for each full year Grantee has owned and resided in the mortgaged premises, commencing on the date of the grant.
- In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the Grantor will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as downpayment assistance in the form of a deferred 0%

interest loan. The loan will be forgiven prorata over the period of affordability (5 years), as long as the home remains the principal residence of the home buyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, the Grantor shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds is defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

- If Grantee refinances and the Property remains subject to the encumbrance created by this Agreement, then Grantee shall not be required to repay any portion of the Grant.
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:

N/A

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as 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.
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).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
5. Describe performance standards for evaluating ESG.

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(l)(5)

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

- h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

- i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

- j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

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

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

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

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

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

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

Discussion: