Executive Summary

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

1. Introduction

The City of Florence is located in the northwestern corner of Alabama bordered by Mississippi and Tennessee. According to the 2013 census data, Florence had a population of 40,059 people, a 1.8% population increase change from the 2010 census data. Florence expects population growth in the 2020 census. 2010 census data recorded 17,494 households with a median household income \$36,337. Low and moderate income households are located throughout Florence, with the greatest concentrations being in the East and West Florence area. According to the 2010 census data, the total population for the West Florence entitlement area had 2,667 people with a low/mod percentage of 77.83. The East Florence entitlement area had a population of 5,091 people and a low/mod percentage of 65.62. The goal of the City is to utilize funds granted by the Community Development Block Grant program to provide qualified communities and persons decent housing, expanded economic opportunities, and a suitable living environment. Although the East and West Florence communities are a primary focus under the CDBG program, spot assistance will be used citywide for persons or areas that qualify based on federal requirements.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City of Florence objectives and outcomes identified in this Plan are designed to serve the needs of our residents through professional and efficient management of the HUD programs and funds covered by this Plan. It is the City's mission to distribute the funds and resources in an equitable manner through long-term and short term objectives.

The Objectives are to:

- Continue to provide important community facilities that address all aspects of community development.
- 2. Continue to meet the affordable housing needs of low- and moderate-income individuals through rehabilitation and/or homebuyers programs.
- 3. Continue to clean up blighted properties and dilapidated residential and commercial buildings throughout the City that pose a threat to the community.
- 4. Continue to fund Non-Profit entities that provide services for low-moderate income individuals.
- 5. Continue to fund Public Improvements Projects for the entitlement areas of the City.

3. Evaluation of past performance

In the 2015-2019 Consolidated Plan, the City funded 17 public service organizations that provided help for individuals and families with self-sufficiency, job training, transportation, health services, and youth programs. Additionally, public facilities repair and critical equipment needs; completed three phases out of a six phase sidewalk improvement plan for the West Florence Entitlement Area; removed and cleaned up 29 dilapidated properties; funded three street drainage projects in eligible areas; completed 30 residential rehab jobs; and funded two economic development projects.

4. Summary of citizen participation process and consultation process

"The City of Florence, Alabama encourages participation of citizens in the development and planning of activities relative to its Community Development Block Grant (CDBG) Program. Annual entitlement grants are made to the City from the U.S. Department of Housing and Urban Development (HUD) for the purpose of addressing the needs specifically of low to moderate income residents. Through this Plan, citizen involvement in the CDBG program is designed to be an open process in which citizens are informed and can influence decisions on CDBG activities."

City of Florence Community Development Block Grant Citizen Participation Plan (CPP) is outlined in **Appendix A.** The CPP is posted on the City of Florence Planning and Community Development website located

at https://florenceal.org/departments/planning_and_community_development/community_development_block_grant.php.

The City of Florence hosted six public involvement sessions. Citizens provided their vision for Florence and its neighborhoods. The projects listed in this plan are a direct result of the meetings.

5. Summary of public comments

During sessions, citizens provided their ideas as to how we can grow together, what they see in their communities and how the City can help facilitate those ideas. Each meeting was very informative and the consensus was that homelessness and lack of coordinating services is an issue to our citizens.

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

All comments and suggestions were documented.

7. Summary

During sessions, citizens provided their ideas as to how we can grow together, what they see in their communities and how the City can help facilitate those ideas. Each meeting was very informative and the consensus was that homelessness and lack of coordinating services is an issue to our citizens.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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

Agency Role		Name		Department/Agency		
CDBG Administrator			Department of Planning & Community			
		Developm		nent		

Table 1 – Responsible Agencies

Narrative

The City of Florence Planning & Community Development Department follows approved Policy & Procedures to administer the CDBG Program. *See Appendix B*

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

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)).

The City of Florence met with Executive Director of the Florence Housing Authority to coordinate public housing needs, planned programs and activities, their planned strategies and proposed actions for affirmatively furthering fair housing. Strategies were coordinated to address concerns in fair housing issues in the Public Housing and Housing Choice Voucher programs. We also used this opportunity to identify needs such as local drug elimination, neighborhood improvement programs, and resident programs and services, both those funded under a PHA's program and those funded.

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

The City of Florence met with the Continuum of Care, Executive Director of the Homeless Care Council of Northwest Alabama to coordinate homeless strategies and the resources available to address the needs of homeless persons and persons at risk of homelessness.

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

The City of Florence receives an Emergency Solutions Grant (ESG) thru the Alabama Department of Economic and Community Affairs. Consultation with the Continuum of Care (CoC) determines how to allocate the ESG grant for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS). The office of the CoC is located in Florence however, they serve individuals from Lauderdale, Colbert, Franklin, Marion, Winston and Lawrence counties. ESG funds are eligible to sub recipients that are considered active members of the CoC. All sub recipients must report as required by the Federal regulations. The administration of the HMIS is currently with the HMIS lead agency, United Way of the Shoals. It is expected that the Homeless Care Council of Northwest Alabama to change the HMIS Lead Agency to Community Action Agency of Northwest Alabama and transferring the HMIS software

provider to Service Point. The Policy and Procedures of the administration of HMIS is within the federal guidelines of the Continuum of Care.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Homeless Care Council of Northwest Alabama
1	Agency/Group/Organization	Homeless Care Council of Northwest Alabama
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by	Homelessness Strategy
	Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization	The Homeless Care Council of Northwest
	consulted and what are the anticipated	Alabama was consulted regarding homeless
	outcomes of the consultation or areas for	services, plans, and activities. The City of
	improved coordination?	Florence supports the local CoC to the full
		extent of projects and activities.

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

As many agencies as possible were consulted with all comments documented.

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	Homeless Care Council of Northwest Alabama	

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City also consults with the Alabama Department of Public Health on lead-based paint hazards including child lead testing. The City consults with the Transit Office Manager from Northwest Alabama Council of Local Governments on public transportation needs.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City of Florence Citizen Participation Plan emphasizes and encourages citizens to participate in the development and implementation of the Assessment of Fair Housing (AFH), the Consolidated Plan (CP), any substantial amendment to the CP, and the performance report. These requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those persons living in areas designated by the U.S Census data for the jurisdiction area or in a slum and blighted area and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City of Florence has taken appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. The City of Florence encourages the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the AFH and the CP. The City of Florence also encourages the participation of various public and private organizations and emergency management agencies.

The City of Florence works in conjunction with public housing agencies, such as Florence Housing Authority and the residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the AFH and the CP.

Each event the City of Florence experiments with alternative public involvement techniques and quantitative methods to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance.

For the 2020-2025 CP the City of Florence held six district sessions. These sessions consisted of a town hall style discussion with the Mayor, City Council, department staff, and the public to discuss the vision and needs of their communities. The sessions were advertised in the Courier Journal, a free weekly newspaper that is delivered to every home in Lauderdale County, as well as the City of Florence website, and the public notice board at City Hall and the weekly e-newsletter distributed via email subscription, and social media.

Each session was held in the City of Florence Auditorium at 6:00 p.m. Persons were given a reasonable opportunity to comment on the original citizen participation plan, substantial amendments to the citizen participation plan, the CP, and CP amendments.

Citizen Participation Outreach

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of commen	URL (If
r	h	h	response/attendanc	comments received	ts not accepted	applicable
			е		and reasons)

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of commen ts not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-	District 1- West	District One Meeting	All comments were	-
		targeted/broad	Florence	10/30/2018VISION: Clean	accepted	
		community		City Blight Removal, Trash,		
				Wild Animal Control Good		
				Infrastructure Better streets		
				(paving, pot holes, etc,		
				sidewalks, speed		
				bumps/control) College		
				Street Bridge opened		
				backup. Safe Streets School		
				Shelters Park & Recreation		
				Activities Positive Business		
				Growth Business		
				Opportunities Jobs for		
				Minority Population Transit		
				Entertainment District		
				Resources Homeless,		
				elderly, youth resources.		
				Funding for Homeless		
				Shelter. Self-Sufficiency		
				programs. Positive		
				Residential Growth		
				Housing built on vacant		
				lots. Community		
				Investments and Business		
				Revitalization Private and		
				Public Investments Money,		
				access to public and private		
	Consolidated	Plan	FLORENCE	grants Community Policing	11	
OMB Control No:	2506-0117 (exp. 06/30/201	 8)		A city and neighborhood		
	, , , , , , , , , , , , , , , , , , , ,	,		partnerships.		
				neighborhood watch		
				\		

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of commen	URL (If
r	h	h	response/attendanc	comments received	ts not accepted	applicable
			е		and reasons)
2	Public Meeting	Non-	District 2-	District Two Meeting	All comments were	
		targeted/broad	Downtown Florence	10/30/2018 VISION:	accepted	
		community		Complete River Heritage		
				Est. Florence/ Land Are.		
				Center Community Gardens		
				Take care of the homeless		
				Mental Health Services		
				Housing Geared toward		
				young Families Team. To		
				Retain Talent/ People Road		
				Improvements & Main.		
				More police to Service		
				communities More		
				Fireman Neighborhood		
				Watch Gate ways into City		
				(72 ENT.) Homeless services		
				(Panhandlers) /Homeless		
				Shelter to attract away from		
				the downtown area. Google		
				Fiber or Fiber Tech Identify		
				Growth for UNA Via P.C.		
				/Town/Gown Relationships		
				Leadership Groups/ Youth		
				leadership programs		
				Celebrate History/ inform		
				the young about Florence		
				History Infill Housing		
				Development. Improving		
	Consolidated	Plan	FLORENCE		12	
OMB Control No:	2506-0117 (exp. 06/30/201			bulbs Expansion of Ent.		
	, , , , , , , , , , , ,	,		District (Terms) Waste		
				Stations for pets College St.		

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of commen ts not accepted and reasons	URL (If applicable)
3	Public Meeting	Persons with	District 3- East	District Three Meeting	All comments were	-
		disabilities	Florence	11/27/2018VISION:	accepted	
				Updated Parks City/ County		
				Debt Free for Economy		
				GrowthGood Solid		
				Infrastructure Younger		
				Skilled WorkersCareer		
				Tech./ TradeYouth Activities		
				Road Infrastructure/local/		
				pot holes Special Education		
				Existing Infrastructure		
				Neighborhood		
				preservationQuality		
				Resources Citizens		
				Enjoyment Encourage		
				Tourism Public		
				safetyHomeless Assistance		
				Safety East Florence/ Crime		
				/ Drugs Music Venue-		
				Indoor/ outdoor Growth in		
				west FlorenceInfill		
				Development Economic		
				Development Skilled		
				Training ProgramsSkilled		
				JobsBlight East		
				FlorenceNeighborhood		
				WatchQuality Education		
				System Neighborhood		
	Consolidated	Plan	FLORENCE	StabilityVeteran	13	
OMB Control No:	2506-0117 (exp. 06/30/201	 		TourismVeteran		
	·			ParkVeteran appreciation		
				and events honoring past		

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

In accordance with the Florence Citizen Participation Plan, the Mayor and the Planning & Community Development staff hosted a series of six district sessions to discuss ideas and suggestions needed thru out the City of Florence. All meetings were held at 6:00p.m in the City Auditorium located on South Pine Street. Citizens were asked to attend on the date set for their respective Council District, however anyone was welcomed to every meeting.

Tuesday, October 30 Tuesday, November 13 Tuesday, November 27 Thursday, November 29 Tuesday, December 11 Thursday, December 13

These sessions were advertised in the Courier Journal, social media, website, City Council meetings, and the Mayor's news blast.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

According to the 2005-2009 ACS and the 2011-2015 ACS data required by HUD the population has increased by 1%, households have increased by 7% and the median income reflects an increase of 16%. The City of Florence anticipates an increase of population from the 2010 to the 2020 census.

According to the 2010 census data, the total population for the west Florence entitlement area had 2,667 people with a low/mod percentage of 77.83. The east Florence entitlement area had a population of 5,091 people and a low/mod percentage of 65.62. The median household income for the City of Florence from 2009-2013 was \$36,337 with an average of 24% of persons below the poverty level.

According to the 2013 census data, Florence had a population of 40,059 people, a 1.8% population increase change from the 2010 census data. There was a recorded 17,494 households with a median household income report of \$36,337. Low and Moderate income households are located throughout the City of Florence, with the greatest concentrations being in the east and west Florence areas.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	39,319	39,855	1%
Households	16,392	17,565	7%
Median Income	\$30,931.00	\$35,731.00	16%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30%	>30-50%	>50-80%	>80-100%	>100%
	HAMFI	HAMFI	HAMFI	HAMFI	HAMFI
Total Households	3,355	2,245	3,085	1,600	7,280
Small Family Households	1,145	560	900	445	3,420
Large Family Households	90	60	220	120	190
Household contains at least one					
person 62-74 years of age	355	575	610	365	1,595
Household contains at least one					
person age 75 or older	180	375	540	340	1,014
Households with one or more					
children 6 years old or younger	509	355	380	190	405

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

			Renter					Owner		
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOL	SEHOLDS									
Substandard										
Housing -										
Lacking										
complete										
plumbing or										
kitchen facilities	30	0	15	0	45	30	0	0	0	30
Severely										
Overcrowded -										
With >1.51										
people per										
room (and										
complete										
kitchen and										
plumbing)	0	0	0	0	0	0	0	0	0	0
Overcrowded -										
With 1.01-1.5										
people per										
room (and none										
of the above										
problems)	70	15	0	0	85	10	0	0	0	10
Housing cost										
burden greater										
than 50% of										
income (and										
none of the										
above										
problems)	1,515	315	4	0	1,834	395	200	190	0	785
Housing cost										
burden greater										
than 30% of										
income (and										
none of the										
above										
problems)	340	680	440	65	1,525	55	230	385	175	845

			Renter		Owner					
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Zero/negative										
Income (and										
none of the										
above										
problems)	375	0	0	0	375	40	0	0	0	40

Table 7 – Housing Problems Table

Data 2011-2015 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

		Renter						Owner		
	0-30%	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		30%	50%	80%	100%	
		AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEHO	OLDS									
Having 1 or more of										
four housing										
problems	1,615	325	20	0	1,960	430	200	190	0	820
Having none of four										
housing problems	740	1,060	1,395	535	3,730	160	660	1,480	1,065	3,365
Household has										
negative income,										
but none of the										
other housing										
problems	375	0	0	0	375	40	0	0	0	40

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter			Owner				
	0-30% AMI	>30-50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOL	SEHOLDS							
Small Related	755	295	129	1,179	170	100	215	485
Large Related	50	40	15	105	20	0	105	125
Elderly	195	159	105	459	155	240	145	540

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Other	920	515	210	1,645	125	90	110	325
Total need by income	1,920	1,009	459	3,388	470	430	575	1,475

Table 9 - Cost Burden > 30%

Source:

Data 2011-2015 CHAS

4. Cost Burden > 50%

	Renter			Owner				
	0-30%	>30-	>50-	Total	0-30%	>30-	>50-	Total
	AMI	50%	80%		AMI	50%	80%	
		AMI	AMI			AMI	AMI	
NUMBER OF HOU	ISEHOLDS							
Small Related	595	90	4	689	170	40	90	300
Large Related	30	30	0	60	20	0	0	20
Elderly	90	24	0	114	115	100	25	240
Other	815	175	0	990	110	60	75	245
Total need by	1,530	319	4	1,853	415	200	190	805
income								

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

			Renter					Owner		
	0-30% AMI	>30- 50%	>50- 80%	>80- 100%	Total	0-30% AMI	>30- 50%	>50- 80%	>80- 100%	Total
	Alvii	AMI	AMI	AMI		Alvii	AMI	AMI	AMI	
NUMBER OF HOUSEH	IOLDS					I.				
Single family										
households	70	15	0	0	85	10	0	0	0	10
Multiple, unrelated										
family households	0	0	0	0	0	0	0	0	0	0
Other, non-family										
households	0	0	0	0	0	0	0	0	0	0
Total need by	70	15	0	0	85	10	0	0	0	10
income										

Table 11 – Crowding Information – 1/2

Data Source:

2011-2015 CHAS

		Renter				Ow	ner	
	0-30% AMI	>30- 50%	>50- 80%	Total	0-30% AMI	>30- 50%	>50- 80%	Total
		AMI	AMI			AMI	AMI	
Households with								
Children Present	0	0	0	0	0	0	0	0

Table 12 - Crowding Information - 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

According to the 2011-2015 Community Housing Data Set, 2,619 households are in need of some type of housing assistance. Currently, there are 184 single person households are currently homeless or staying in some kind of transitional housing which is temporary. These needs are described as substandard conditions, cost burdened, and/or overcrowding.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to Safeplace, Inc there were 4,000 persons who were either disabled or victims of domestic violence, dating violence, sexual assault and stalking (both individuals and single women families) are in need of housing assistance. Approximately, 2000 of those are adults with children.

What are the most common housing problems?

The most common housing problems in Florence are the lack of income to procure affordable housing or to afford basic utilities. The lack of employment does not supply enough income to meet the costs of maintaining housing. Affordable housing at times is located in the rural areas of Lauderdale County just outside of Florence and too far away to access major resources like grocery stores, medical facilities and employment. Due to the lack of public transportation, rural housing solutions do not work. Mental health issues also keep persons from obtaining employment and adequate housing.

Are any populations/household types more affected than others by these problems?

Households where there is chronic substance abuse, mental health issues, no private mode of transportation, and households where income is solely made up of SSI Benefits or those with increased health problems.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of

either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Some of the characteristics of low income individuals and low income families that are in imminent risk in Florence are as follows:

Lack of transportation to get to and from work. Therefore, this translate to lack of employment, and inability to afford adequate housing. The lack of public transportation also places burdens such as missing court dates and other important appointments which cause them to lose their jobs or incur fines. This results in lack of funds to pay housing costs. Some suffer from chronic substance abuse and or mental and physical disabilities, which make regular employment difficult, as well as causing interference with paying rent and utilities on time. Some persons struggle to have enough money to cover rent, utilities, food and medications and they often make food and medication the priority, which leaves them unable to pay rent and utilities.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Point-in-Time (PIT) Count is an annual survey of homeless persons and agencies serving homeless to generate estimates of the number of homeless persons residing in the area. The Homeless Care Council of Northwest Alabama (HCCNWA) conducts throughout the six county coverage areas. The most recently completed 2020 PIT report, estimates that there were 198 homeless individuals in the area during the last count. This total represents a pattern of increasing numbers of homeless persons since 2005.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

According to the data provided by the HCCNWAL, the top five reasons for homelessness given by respondents were chronic substance abuse, mentally or physically disabled, domestic violence, and unemployment.

Discussion

According to the 2011 census and five year ACS data, the City of Florence had a population of 36,264. In the most recent census the population shows an 8% increase to 39,085. The median family income for the City of Florence has increase to the most recent \$32,122.00. The 2006-2010 ACS Data reflects 7,620 households in need of housing assistance. Their needs were described as substandard conditions, cost burdens, and overcrowding. There were 84 individuals listed as disabled or a victim of domestic violence and in need of housing assistance. The housing problems identified in Florence are lack of

employment, public transportation, and mental health issues that keep individuals from regular paying jobs. In households where substance abuse and mental health issues play a role income is mostly made up of SSI benefits. The needs of the extremely low income individuals and families in Florence typically do not have transportation to get to and from work and keeps them unemployed or underemployed thus unable to afford adequate housing.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of racial or ethnic groups at a given income level experience housing problems at a greater rate than the income level as a whole. Housing problems are identified as having one or more problems such as; lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and/or a cost burden greater than 30%. The ethnic breakdown is: White, Black, Asian, American Indian, Pacific Islander, or other.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,440	505	415
White	1,625	430	255
Black / African American	720	65	115
Asian	0	0	35
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	65	10	10
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,435	805	0

^{*}The four housing problems are:

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	1,075	555	0
Black / African American	240	220	0
Asian	0	0	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	50	15	0
0	0	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,035	2,050	0
White	855	1,510	0
Black / African American	155	450	0
Asian	0	35	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	20	0	0
0	0	0	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

^{*}The four housing problems are:

^{*}The four housing problems are:

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	240	1,355	0
White	190	1,115	0
Black / African American	54	155	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	35	0
0	0	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:
CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

According to the 2006-2010 CHAS data provided by HUD; 2,440 households reported having one or more of the housing problems. The largest percentages of having one or more of the problems were white households. According to the 2012-2016 CHAS data provided by HUD; 9,185 households had 1 or more of the housing problems.

^{*}The four housing problems are:

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Households by income level having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms. A disproportionately greater need exists when the members of racial or ethnic groups at a given income level experience severe housing problems at a greater rate than the income level as a whole. Housing problems are identified as having one or more problems such as; lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and/or a cost burden greater than 30%. The ethnic breakdown is: White, Black, Asian, American Indian, Pacific Islander, or other.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,045	900	415
White	1,360	690	255
Black / African American	600	180	115
Asian	0	0	35
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	65	10	10
0	0	0	0

Table 17 - Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	525	1,720	0
White	385	1,245	0
Black / African American	110	345	0
Asian	0	0	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	15	50	0
Other	0	0	0

Table 18 - Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	210	2,875	0
White	190	2,170	0
Black / African American	20	585	0
Asian	0	35	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	0	20	0
Other	0	0	0

Table 19 - Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

^{*}The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	0	1,600	0
White	0	1,305	0
Black / African American	0	210	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	35	0
Other	0	0	0

Table 20 - Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

According to the 2006-2010 CHAS data provided by HUD; 2,045 households reported having one or more of the housing problems. The largest percentages of having one or more of the problems were white households according to the 2012-2016 CHAS data provided by HUD; 9,185 households had 1 or more of the housing problems. With 4,830 households severe problems.

^{*}The four severe housing problems are:

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Cost burden is a fraction of a households total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs, include mortgage payment, taxes, insurance, and utilities. A disproportionately greater need exists when the members of racial or ethnic groups at a given income level experience housing problems at a greater rate than the income level as a whole. Housing problems are identified as having one or more problems such as; lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and/or a cost burden greater than 30%. The ethnic breakdown is: White, Black, Asian, American Indian, Pacific Islander, or other.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	11,775	2,690	2,655	450
White	9,705	1,965	1,865	290
Black / African American	1,665	485	730	115
Asian	100	30	0	35
American Indian, Alaska				
Native	35	0	4	0
Pacific Islander	0	0	0	0
Hispanic	150	140	25	10

Table 21 - Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name: CONSOLIDATED PLANNING/CHAS DATA 2012-2016

Data Source Comments:

Discussion:

At the extremely low income category 9,705 of the jurisdiction's white households in this income category are cost burdened while 1,665 of Black households and 150 of Hispanic households are also cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Although they compromise a small segment of the housing market, very low and low income white households consistently demonstrate a disproportionately greater need for housing assistance.

If they have needs not identified above, what are those needs?

There is a great need for housing rehabilitation as well as first time home buyers assistance.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Within the City of Florence, racial and ethnic minorities heavily reside in East and West Florence as highlighted on the City's Entitlement Geography Map.

NA-35 Public Housing – 91.205(b)

Introduction

The Authority has converted all public housing developments to the Rental Assistance Demonstration program which will allow the Authority greater latitude to use tax credits and conventional financing to address modernization needs. The Authority will be changing its funding from public housing operating funding and Capital Fund Program funding to a twenty-year Section 8 Contract for Multi-family housing. This has already taken place at all developments of the Housing Authority. The needs at the housing developments include but not limited to roofs, cabinets, flooring, windows, exterior doors, resurfacing of parking areas, interior painting of units, and replacement of heat and air conditioning units.

Totals in Use

	Program Type								
	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Vo	ucher
					based	based	Veterans	Family	Disabled
							Affairs	Unification	*
							Supportive	Program	
							Housing		
# of units vouchers in use	0	0	642	654	0	654	0	0	0

Table 22 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

	Program Type											
	Certificate	Mod-	Public	Vouchers								
		Rehab	Housing	Total	Project -	Tenant -	Special Purp	ose Voucher				
					based	based	Veterans Affairs Supportive Housing	Family Unification Program				
Average Annual Income	0	0	9,906	10,125	0	10,125	0	0				
Average length of stay	0	0	4	6	0	6	0	0				
Average Household size	0	0	1	2	0	2	0	0				
# Homeless at admission	0	0	0	0	0	0	0	0				
# of Elderly Program Participants												
(>62)	0	0	152	73	0	73	0	0				
# of Disabled Families	0	0	213	201	0	201	0	0				
# of Families requesting accessibility												
features	0	0	642	654	0	654	0	0				
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0				
# of DV victims	0	0	0	0	0	0	0	0				

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

			1	Program Type					
Race	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Vo	ucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	287	280	0	280	0	0	0
Black/African American	0	0	350	373	0	373	0	0	0
Asian	0	0	0	1	0	1	0	0	0
American Indian/Alaska									
Native	0	0	3	0	0	0	0	0	0
Pacific Islander	0	0	2	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

				Program Type					
Ethnicity	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Speci	ial Purpose Vo	ucher
				based		based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	8	5	0	5	0	0	0
Not Hispanic	0	0	634	649	0	649	0	0	0
*includes Non-Elderly Disable	d, Mainstream	One-Year, M	ainstream Fi	ve-year, and Nu	rsing Home Tra	nsition	•	•	•

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The City of Florence does not have public housing.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Florence Housing Authority owns and operates 722 housing units in eight developments. The Housing Authority's waiting list is open for all bedroom sizes. Florence Housing Authority administers 691 Housing Choice Vouchers. These stay fully utilized. The waiting list is currently open and there are 947 applicants on the waiting list.

How do these needs compare to the housing needs of the population at large

There are more needs and more varied needs in the low income community than the population at large.

Discussion

The Housing Authority has a need for restoration and revitalization of some of its units. Due to the age of most of the housing developments in the City of Florence there remains a need to repair and upgrade systems of the housing inventory. The Housing Authority has abated all lead-based paint issues in all housing developments. The Authority has converted all public housing developments to the Rental Assistance Demonstration program which will allow the Authority greater latitude to use tax credits and conventional financing to address modernization needs. The Authority will be changing its funding from public housing operating funding and Capital Fund Program funding to a twenty-year Section 8 Contract for Multi-family housing. This has already taken place at all developments of the Housing Authority. The needs at the housing developments include but not limited to roofs, cabinets, flooring, windows, exterior doors, resurfacing of parking areas, interior painting of units, and replacement of heat and air conditioning units.

In accordance with HUD regulations the Housing Authority completed a Section 504 Needs Assessment in August 2014 to determine the needs of residents and applicants for accessible units as well as what renovations need to be made to units, common areas, offices and exterior spaces to be in compliance. Five percent of the Authority's units are accessible units and two percent are equipped for the sight and hearing impaired. The Housing Authority currently has a sufficient number of units in its physical inventory to meet the needs of residents and applicants for accessible units based on waiting list and transfer requests. Currently the Housing Authority has a total of 57 accessible units in its physical inventory consisting of 43 which are wheel chair accessible and 14 which are audio and visual impaired equipped.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Florence partners with the local Continuum of Care (CoC), Homeless Care Council of Northwest Alabama (HCCNWAL). The HCCNWAL keeps data on persons who are homeless or at risk of homelessness. The HCCNWAL is prescribed by HUD therefore acts in accordance to federal regulations. The HCCNWAL reports data to the City of Florence on an as requested basis and receives the majority of its data from the Homeless Management Information System (HMIS) and data from the Point-In-Time (PIT) count conducted in accordance with HUD standards. The 2020 Point-In-Time count was conducted on January 23, 2020.

The latest PiT included each category of homeless persons specified by HUD (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth), the number of persons experiencing homelessness on a given night, the number of persons who experience homelessness each year, the number of persons who lose their housing and become homeless each year, the number of persons who exit homelessness each year, the number of days that persons experience homelessness, and other measures specified by HUD.

In addition the gather information on characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but threatened with homelessness. This information may be evidenced by the characteristics and needs of individuals and families with children who are currently entering the homeless assistance system or appearing for the first time on the streets.

Homeless Needs Assessment

Population	experiencing	e # of persons homelessness ven night	Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s)						
and Child(ren)	0	7	0	0	0	0
Persons in Households with Only						
Children	148	0	0	0	0	0

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OMB Control No: 2506-0117 (exp. 06/30/2018)

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Only						
Adults	53	182	0	0	0	0
Chronically Homeless Individuals	2	19	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Alternate Data Source Name: 2019 Point in Time Data
Data Source Comments:

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s)						
and Child(ren)	0	0	0	0	0	0
Persons in Households with Only						
Children	0	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Only						
Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 27 - Homeless Needs Assessment

Alternate Data Source Name: 2019 Point in Time Data
Data Source Comments:

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

During the Homeless Care Council's Point in Time Count it was discovered that the rural homeless population was the most difficult to count due to HUD's definition of homelessness. The Homeless service providers that serve the rural populations report that homeless are usually doubled up with family or friends, or are precariously housed thus not being counted as literally homeless.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

See attached 2019 Point in Time data received from the Homeless Care Council of Northwest Alabama.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:		Unsheltered (optional)
White		115	110
wille		115	118
Black or African American		70	83
Asian		0	0
American Indian or Alaska			
Native		1	0
Pacific Islander		1	0
Ethnicity:	Sheltered:		Unsheltered (optional)
Hispanic		12	0
Not Hispanic		177	201

Alternate Data Source Name:

2019 Point in Time Data

Data Source Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2015 Point in Time Survey results show that there were 21 families with children and the majority were sheltered. A total of 16 individuals were identified as veterans and also identified as being sheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

According to the 2015 Point in Time Survey report the following numbers reflect sheltered indivudals by race: 37 Black, 112 White, 0 Asian, 2 American Indian or Alska Native, 0 Pacific Islander, 2 Hispanic. The unsheltered numbers reflected by race: 6 Black, 29 White, 0 Asian, 4 American Indian or Alaskan Native, 0 Pacific Islander, 2 Hispanic. The majority of homeless in the area continue to be emergency based.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The majority of survey respondents classified themselves as sheltered homeless indicating they stayed in an emergency shelter the night before. There are a few individuals that reported being unsheltered. These individuals reported that they had slept on the street or in their cars. The large majority of the Homeless Care Council of Northwest Alabama's jurisdiction is made up of urban counties.

Discussion:

During the Homeless Care Council's 2015 Point in Time Count it was discovered that the rural homeless population was the most difficult to count due to HUD's definition of homelessness. The Homeless service providers that serve the rural populations report that homeless are usually doubled up with family or friends, or are precariously housed thus not being counted as literally homeless. The survey data shows that there were 235 homeless persons. The vast majority self-reported having access to emergency or transitional housing. Of the total 235 individuals there were 21 families with children, 16 individuals were identified as veterans, and the white race being the leading racial group of homeless individuals. The majority of area homeless continue to be emergency based and indicated that they had stayed in emergency shelter the night before. However, because the Homeless Care Councils jurisdiction is mostly urban counties there are a few individuals that reported as having slept on the streets or in their cars.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d) Introduction:

The City of Florence makes every effort to put families in need of housing assistance in contact with local agencies that provide assistance for extremely low-income, low-income, moderate-income, and middle-income families; Renters and owners; Elderly persons; Single persons; Large families; Public housing residents; Families on the public housing and Section 8 tenant-based waiting list; Persons with HIV/AIDS and their families; Victims of domestic violence, dating violence, sexual assault, and stalking; Persons with disabilities; and formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

Describe the characteristics of special needs populations in your community:

In Florence the special needs population consist of individuals that are elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or drug addiction, persons with HIV/AIDS and their families, public housing residents. Typically the needs of the special population consist of medical care, public transportation, food, rent and utility assistance, and education for the youth that commonly resides with them.

What are the housing and supportive service needs of these populations and how are these needs determined?

The City of Florence coordinates with multiple area agencies to determine the housing and supportive services needs for our communities by way of the annual Point-in-Time Survey, as well as data gathers from 211 Information and Referral system. When any individual in need contacts 211, they are referred to an agency that is local to their location. In Florence, a few of those agencies are Community Action Agency of Northwest Alabama, Safeplace, Inc., One Place of the Shoals, the Homeless Care Council of Northwest Alabama, Salvation Army of the Shoals, St. Vincent de Paul, Shoals Community Clinic. For example, some of the supportive services needs are proper documentation, transportation, immediate healthcare, assistance with applying for benefits such as social security disability. There are also immediate needs of clothing and food. Housing needs are for immediate permanent housing.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

SUBMITTED QUESTION TO APRIL AT AIDS ACTION COALITION 2/6/2020

Discussion:

The City of Florence will continue to utilize the CDBG funds to help services and activities that address the characteristics of special needs in our community and will continue throughout the 2020-2025 program years.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public Facilities are a detrimental resource for the City of Florence. These facilities include but not limited to senior centers, youth centers, child care centers, health facilities, parks and recreational facilities, neighborhood centers, and fire departments. The City of Florence will continue to fund projects that address the needs of these facilities operations.

How were these needs determined?

These needs were determined through the citizen participation process, agency consultations, the community needs assessment survey, and requests for funding assistance.

Describe the jurisdiction's need for Public Improvements:

Public Improvements are defined as needs to the jurisdictions public infrastructures. The Five Year Plan will address these needs through Public Facilities Improvements, sidewalk implementation and repairs, and storm drainage projects within the Entitlement communities.

How were these needs determined?

These needs were determined through the Public Participation Process, other City departments, and drive by surveys.

Describe the jurisdiction's need for Public Services:

Public services needs were determined based on community feedback during public hearings, consultations with service providers, feedback from the community needs assessment survey and requests for CDBG funding via an Application for Public Services Funding issued by the City.

How were these needs determined?

These needs were determined through the Community Meetings hosted by the Mayor, Steve Holt.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Based on information available to the City, the Consolidated Plan must describe the significant characteristics of Huntsville's housing market, including the supply, demand, condition and cost of housing and the housing stock available to service persons with disabilities, and to serve persons with HIV/AIDS and their families. The Market Analysis will also touch on the following key points:

- the condition and needs of public and assisted housing;
- a brief inventory of facilities, housing, and services that meet the needs of homeless persons;
- regulatory barriers to affordable housing; and
- the significant characteristics of the jurisdiction's economy.

In general, the market analysis determined that there are housing needs for the City of Florence as follows:

- additional affordable housing unit for small families and the elderly
- additional affordable owner occupied units
- increased quality and improved condition of existing rental units

MA-10 Number of Housing Units - 91.210(a)&(b)(2)

Introduction

According to the 2006-2010 ACS Data, the City of Florence housing market consists of 19,552 residential housing units. The City of Florence is made up mostly of 1-unit detached structures, these structures amount to 13,460(69%), 1-unit attached structures amounting to 372(2%), 2-4 units amounting to 2,107(11%), 5-19 units amounting to 2,393(12%), 20 or more units amounting to 911 (5%), Mobile Home, boat, van, etc. amounting to 309 (1%).

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	13,625	68%
1-unit, attached structure	245	1%
2-4 units	2,075	10%
5-19 units	2,840	14%
20 or more units	835	4%
Mobile Home, boat, RV, van, etc	455	2%
Total	20,075	100%

Table 28 - Residential Properties by Unit Number

Data Source: 2011-2015 ACS

2014-2018 ACS

https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html

Unit Size by Tenure

	Owners		Renters		
	Number	%	Number	%	
No bedroom	60	0%	270	4%	
1 bedroom	180	2%	3,590	48%	
2 bedrooms	2,540	26%	7,170	94%	
3 or more bedrooms	17,086	172%	4,240	56%	
Total	19,866	200%	15,270	202%	

Table 29 - Unit Size by Tenure

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US01_0500000US01077&hidePreview=true&t=Housing%3

Comments:

2014-2018 ACS

https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to Florence Housing Authority there are 665 housing units in seven developments in the City of Florence. The Florence Housing Authority is funded throught federal, state, and local entities.

In addition the City of Florence, has used its CDBG funding during the previous consolidated planning period for the following programs targeted to low- and moderate-income areas and individuals:

CDBG

- Housing rehabilitation for low- and moderate-income special needs groups, such as elderly and disabled
- Public Services activities not to exceed 15% of the total award.
- Code Enforcement activities to provide neighborhood stabilization
- Public Facilities such as parks infrastructure projects
- Clearance of qualifying properties
- Administration funding for program management

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the Florence Housing Authority they are classified as a High Performer and are in good standing and do not expect a loss of inventory.

Does the availability of housing units meet the needs of the population?

No, according to Florence Housing Authority there are 722 housing units in 8 developments in the City of Florence. The Housing Authority's waiting list is open for all bedroom sizes. The waiting list is currently closed and there are 947 applicants on the waiting list.

Describe the need for specific types of housing:

As previously stated, there are 947 applicants on the waiting list for multi-family housing.

Discussion

According to the information provided through the ACS data set and the housing authority; the greatest need for housing in the City is the construction of additional units to supply the needs of the population.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The Housing Market Analysis, Cost of Housing section, discusses the median home value versus the median contract rent. According to the 2015 data set, Florence had a median home value of 104,200, an increase of 26% from the 2000 data set. The 2009 median contract rent is 353, and increase of 16% from 2000. 82% percent of the population paid less than \$500.00, 17% between \$500-\$999, and 1% between \$1,000-\$1,499.

As reflected by the latest census information, the City of Florence has 15,913 year round housing units, with 14,919 units' occupied and 994 units vacant. Statistics show 1,193 rental units, 900 owner-occupied units as substandard.

The 2000 census reflects 2,595 of the households in Florence are extremely low income households (0 to 30% of the MFI) with 48% of them spending more than 50% of their income on housing costs. It also identified that 1,882 households in Florence are very low income households (31% to 50% of the MFI) with 14 percent of them spending more than 50% of their income on housing costs. Furthermore, there are 2,209 households that are low income households (51% to 80% of the MFI) and 3 percent are spending over 50 percent of the income on housing costs. The information reflects that rental units affordable to households below 80% of the median are approximately 5,639, and owner units affordable to households below 80% of median to be approximately 5,129.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	98,300	125,300	27%
Median Contract Rent	353	412	17%

Table 30 - Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	5,685	74.5%
\$500-999	1,930	25.3%
\$1,000-1,499	10	0.1%
\$1,500-1,999	10	0.1%
\$2,000 or more	0	0.0%
Total	7,635	100.0%

Table 31 - Rent Paid

Data Source: 2011-2015 ACS

2014-2018 ACS

https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,105	No Data
50% HAMFI	3,380	890
80% HAMFI	6,075	2,685
100% HAMFI	No Data	3,874
Total	10,560	7,449

Table 32 - Housing Affordability

Data Source: 2011-2015 CHAS

2014-2018 ACS

https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 33 – Monthly Rent

Data Source Comments:

2014-2018 ACS

https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html

Is there sufficient housing for households at all income levels?

As stated in the Public Housing section of this plan, there are numerous people on the waiting list for low income housing facilities and section 8 vouchers.

How is affordability of housing likely to change considering changes to home values and/or rents?

Based on the information provided, home values have increased by 26% and the median contract rent has had only a 16% over the past ten years.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Not Applicable.

Discussion

In the City of Florence the cost of Housing does not seem to be a large issue as much as availability of housing and private lending restrictions.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The City of Florence Residential Rehabilitation program has been a success over the past years. During the past five years, CDBG funds were used to rehabilitate 68 owner occupied homes.

Definitions

Standard conditions are defined as meeting the HUD housing Quality Standards (HQS) and all state and local codes. Substandard conditions but suitable for rehabilitation is defined as a unit being in poor condition but is structurally and financially feasible to rehabilitate. The City of Florence housing stock would be classified as having a majority of housing defined as Standard Condition. However, The City will continue to utilize grant funds in the rehabilitation of housing that is in poor condition but suitable for repair. The criteria under our housing rehab program requires that the home owner meet the HUD eligible income limit and the house value be more than the cost of repair.

Condition of Units

Condition of Units	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
With one selected Condition	1,905	19%	3,395	44%
With two selected Conditions	20	0%	105	1%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	8,005	81%	4,135	54%
Total	9,930	100%	7,635	99%

Table 34 - Condition of Units

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US01_0500000US01077&hidePreview=true&t=Housing%3

Comments:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter	-Occupied
	Number	%	Number	%
2000 or later	1,025	10%	780	10%
1980-1999	1,989	20%	1,910	25%
1950-1979	5,767	58%	4,040	53%
Before 1950	1,145	12%	905	12%
Total	9,926	100%	7,635	100%

Table 35 - Year Unit Built

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US01_0500000US01077&hidePreview=true&t=Housing%3

Comments:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	6,912	70%	4,945	65%
Housing Units build before 1980 with children present	445	4%	255	3%

Table 36 - Risk of Lead-Based Paint

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US01_0500000US01077&hidePreview=true&t=Housing%3

Comments:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

Over the past five years, the City of Florence has utilized CDBG funds to grant homeowners money to rehabilitate their homes. These repairs are limited to roof, HVAC, energy efficiency (windows and doors0 and handicap accessibility. This has been a high priority need.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to the data provided by HUD, There are a total of 11,251 owner occupied and rental occupied units that can potentially contain lead based paint hazards.

Discussion

We anticipate continuing the rehabilitation program on homes that do not have lead based paint hazards. The City does not have the resources available to remediate Lead Based Paint Hazards at this

time. However, plans are in place to apply for HUD programs to remediate home containing lead based paint.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Florence Housing Authority owns and operates 722 housing units in eight developments. The Housing Authority's waiting list is open for all bedroom sizes. Florence Housing Authority administers 691 Housing Choice Vouchers. These stay fully utilized. The waiting list is currently open and there are 947 applicants on the waiting list.

Totals Number of Units

				Program Type					
	Certificate	Mod-Rehab	Public			Vouche	rs		
			Housing	Total	Total Project -based Tenant -based Special Purpose Voucher				er
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers									
available			652	691			0	0	0
# of accessible units									
*includes Non-Flderly Disabled	Mainstream	One-Year Ma	ainstream Fiv	e-vear and Nu	sing Home Trai	nsition			

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Florence Housing Authority incorporated in 1935, is the primary provider of multi-family and assisted housing in the City of Florence. The Housing Authority's housing inventory is as follows:

- a. Cherry Hill Homes: Florence Boulevard, Florence, AL 35630; completed in 1951 consisting of 159 units. This development converted to RAD in 2018 and will begin new construction this year with 9% tax credit funding. This development also contains the offices of Community Action Agency of Northwest Alabama, Inc.
- b. Cherry Hill Homes Tyree Place: Thompson Street, Florence, AL 35630; completed in 2013 consisting of 13 units of multi-family housing and 7 units of unassisted housing units. This development converted to RAD in 2018.
- d. Magnolia Gardens I: 110 South Cypress Street, Florence, AL 35630; completed in 1978 consisting of 99 units. This is a ten-story elderly high-rise building. This property was renovated with 9% tax credit funding in 2017.
- e. Magnolia Gardens II: 103 South Cypress Street, Florence, AL 35630; completed in 1982 consisting of 115 units. This is an eleven-story elderly high-rise building. This property was renovated with 9% tax credit funding in 2017.
- f. W. C. Handy Place: 309-A W. C. Handy Place, Florence, AL 35630; completed in 1956 consisting of 50 units. The development also includes a health clinic. This property was renovated with 4% tax credit funding in 2019.
- g. Carver Homes: 1106 Carver Homes, Florence, AL 35630; completed in 1951 consisting of 75 units. This development converted to RAD This development also contains Common Ground Shoals.
- h. Cypress Pointe: 1451-A Cypress Pointe, Florence, AL 35630: completed in 1968 consisting of 129 family units and an elderly complex consisting of 20 apartments. This property was renovated with 4% tax credit funding in 2019.
- i. Applegate Apartments: 162 Rose Drive, Florence, AL 35630: purchased by Florence Housing Authority in February 2018 and consists of 20 low-income elderly units.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Housing Authority has a need for restoration and revitalization of some of its units. Due to the age of most of the housing developments in the City of Florence there remains a need to repair and upgrade systems of the housing inventory. The Housing Authority has abated all lead-based paint issues in all housing developments. The Authority has converted all public housing developments to the Rental Assistance Demonstration program which will allow the Authority greater latitude to use tax credits and conventional financing to address modernization needs. The Authority will be changing its funding from public housing operating funding and Capital Fund Program funding to a twenty-year Section 8 Contract for Multi-family housing. This has already taken place at all developments of the Housing Authority. The needs at the housing developments include but not limited to roofs, cabinets, flooring, windows, exterior doors, resurfacing of parking areas, interior painting of units, and replacement of heat and air conditioning units.

In accordance with HUD regulations the Housing Authority completed a Section 504 Needs Assessment in August 2014 to determine the needs of residents and applicants for accessible units as well as what renovations need to be made to units, common areas, offices and exterior spaces to be in compliance. Five percent of the Authority's units are accessible units and two percent are equipped for the sight and hearing impaired. The Housing Authority currently has a sufficient number of units in its physical inventory to meet the needs of residents and applicants for accessible units based on waiting list and transfer requests. Currently the Housing Authority has a total of 57 accessible units in its physical inventory consisting of 43 which are wheel chair accessible and 14 which are audio and visual impaired equipped.

Describe the public housing agency's strategy for improving the living environment of lowand moderate-income families residing in public housing:

Florence Housing Authority's main strategy is centered around its conversion to Rental Assistance Demonstration program or RAD. This will allow the Authority to be able to operate like a private developer and borrow against properties and apply for tax credits. The conversion will remove the Declaration of Trust on all developments currently held by HUD. Also the Authority as part of its conversion to RAD will sign a 20 year contract for project-based Section 8 assistance funding which will help maintain a steady predictable stream of funding. The Authority has completed a 20 year physical needs assessment which is being used to guide the renovation work and priorities. The Authority also has a contract with the City of Florence for the services of four full time police officers. They only work the Authority properties and have been contractually delegated the right to issue trespass warnings. The

crime rate in the Authority's developments is low which can be contributed mainly to the community police officers efforts and the increased screening of prospective tenants. The Authority now has property management offices at all developments along with dedicated maintenance personal and police substations.

Discussion:

The City of Florence continues to participate closely with the Florence Housing Authority through Public Service funds, affordable housing, and identifying any impediments to fair housing. A copy of the Florence Housing Authority's Fair Housing Plan and the City of Florence Analysis of Impediments are including in this plan.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The Homeless Care Council of Northwest Alabama (HCCNWA) conducted their 2020 Point in Time Count on January 23rd. Volunteers and students from the University of North Alabama were scattered in Lauderdale, Colbert, Franklin, Marion, Winston, and Lawrence counties taking surveys and handing out warming items.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and					
Child(ren)	39	0	25	0	0
Households with Only Adults	67	0	42	42	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

Community Action Agency is the referral agency for the two emergency shelters located in Florence for Lauderdale and Colbert County. For healthcare services individuals are referred to the Community Health Clinic or to the local Hospital Emergency Room. Mental health clients are referred to Riverbend. Community Action Agency also has a partnership with a private local counselor that will assess the needs of the homeless individuals free of cost. Majority of employment services are handled by the Alabama Career Center but Salvation Army Emergency Shelter participates in the Alabama Job Link. Community Action and Salvation Army refer all clients to Lyons Human Resources Center located in Florence. The Help Center also participates in these resources.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Emergency Shelter Services provided:

The Room in the Inn Shoals provides emergency shelter and food from November thru March, which is when the temperatures are dangerous. This shelter is provided 7 days a week, and is available to anyone seeking shelter. Room in the Inn Shoals is a partnership between local congregations who provide the food and shelter. They can accommodate individuals and families, and have the capability to house up to 48 persons per night at this time.

They refer guests to Community Action Agency, The Help Center, and local churches for additional help with finding new housing, jobs, clothing and medical needs.

In 2015, they housed 37 guests for 111 nights of shelter. They were able to refer 60% of the homeless persons who stayed at their shelter to Community Action Agency, where they were re-housed using available HUD ESG Funds.

The Salvation Army provides 10 emergency shelter beds for males, 6 emergency beds for females and 2 overflow beds. In their housing unit, they have three 3 units, with a total of 18 beds. The Salvation Army is open 365 days a year, with each client eligible for 30 days of shelter per calendar year.

They also provide some limited case support services including help with employment referrals via Jobs to Career and direct link with local temporary agencies. For healthcare, they refer clients to the local emergency room and for mental health, they refer to Riverbend.

MA-35 Special Needs Facilities and Services – 91.210(d) Introduction

The non-homeless special needs assessment is defined as persons who are not homeless but require supportive housing. This includes; elderly, frail elderly, persons with mental and physical disabilities, victims of domestic violence, persons with alcohol or drug addiction, and persons with HIV/AIDS and their families.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Populations identified with special needs include the elderly, disabled persons (mental and physical), persons living with HIV/AIDS, persons with alcohol or substance abuse issues, and homeless persons. Supportive housing for each of these population groups is needed within the City of Florence. There is a high need for transitional and permanent housing for homeless persons, and there is the need for additional housing for persons living with HIV/AIDS.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The City of Florence does provide a direct service however, Riverbend services are located in Florence. Riverbend is a partner with the local CoC and Florence Housing Authority. Policies are in place to provide mental and physical health services to those in need thru the CoC.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Florence will continue to fund Public Services that address homelessness and other special needs.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Florence will continue to fund Public Services that address homelessness and other special needs as well as hold a seat on the Homeless Care Councils Board.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Florence provides the following outline of barriers to affordable housing. Through information provided by Florence Housing Authority, local governments, and the Analysis of Impediments, the following barriers were noted.

- 1. Lack of Decent Afforable Housing Units: Majority of the affordable housing stock has not been maintained by the Landlord. Therefore, some of the units are non-compliant with local building regulations.
- 2. Credit Environment: Lending institutions have become conservative and restrictive in their lending practices.
- 3. Costs Associated with Renovations: Accessible housing units can be more costsly to renovate when the exsting structure is dated and the safety unknown.
- 4. Costs Associated with New Construction: The builing costs for new construction is
- 5. Educating the Community and Developers on Benefits of Affordable Housing:

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

According to the 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs), and the 2014-2018 ACS 5-Year Data Profile the city of Florence has a diverse set of workers. With 17% in the Arts, Entertainment, Accommodations, 18% Education and Health Care Services, 18% Manufacturing, and 18% in the Retail Trade being the largest 4 sector employers in the city.

According to the 2006-2010 ACS Data, (see charts below) the major employment sectors within the City of Florence are Arts and Entertainment, Education and Health Services, Manufacturing, and Retail. Of which 18,519 are in the civilian labor force. Out of this number, 3,145 are in the management, business, and financial sector; 3,118 in sales and office sector; 2,026 in the service sector; and the remaining in farming, construction, and production.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	52	0	0	0	0
Arts, Entertainment, Accommodations	1,874	3,517	17	19	2
Construction	621	661	6	4	-2
Education and Health Care Services	1,959	4,331	18	23	5
Finance, Insurance, and Real Estate	642	1,179	6	6	0
Information	140	307	1	2	1
Manufacturing	2,024	2,269	18	12	-6
Other Services	326	483	3	3	0
Professional, Scientific, Management Services	563	905	5	5	0
Public Administration	0	0	0	0	0

Business by Sector	Number of	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
	Workers		%	%	%
Retail Trade	1,997	3,945	18	21	3
Transportation and Warehousing	231	164	2	1	-1
Wholesale Trade	731	1,068	7	6	-1
Total	11,160	18,829			

Table 41 - Business Activity

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Comments:

Labor Force

Total Population in the Civilian Labor Force	17,985
Civilian Employed Population 16 years and over	16,720
Unemployment Rate	7.03
Unemployment Rate for Ages 16-24	15.65
Unemployment Rate for Ages 25-65	4.34

Table 42 - Labor Force

Alternate Data Source Name: 2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Occupations by Sector	Number of People
Management, business and financial	3,000
Farming, fisheries and forestry occupations	818
Service	2,250
Sales and office	4,453
Construction, extraction, maintenance and	
repair	1,100
Production, transportation and material moving	1,055

Table 43 - Occupations by Sector

Alternate Data Source Name: 2014-2018 ACS 5-Year Data Profile

2014-2016 ACS 3-Teal Data Florile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,777	86%
30-59 Minutes	1,460	9%
60 or More Minutes	695	4%
Total	15,932	100%

Table 44 - Travel Time

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo		
	Civilian Employed Unemployed		Not in Labor Force
Less than high school graduate	1,040	240	1,310
High school graduate (includes			
equivalency)	3,285	175	1,670
Some college or Associate's degree	3,635	260	1,690
Bachelor's degree or higher	3,955	130	1,115

Table 45 - Educational Attainment by Employment Status

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Educational Attainment by Age

			Age		
	18–24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	50	220	155	385	535
9th to 12th grade, no diploma	425	380	520	930	875
High school graduate, GED, or					
alternative	1,390	1,140	1,210	2,780	2,219
Some college, no degree	4,070	1,765	920	1,885	1,630
Associate's degree	140	155	120	740	179
Bachelor's degree	420	920	720	1,580	915
Graduate or professional degree	15	440	330	1,208	834

Table 46 - Educational Attainment by Age

Alternate Data Source Name:

2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,026
High school graduate (includes equivalency)	24,361
Some college or Associate's degree	24,896
Bachelor's degree	66,697
Graduate or professional degree	52,250

Table 47 - Median Earnings in the Past 12 Months

Alternate Data Source Name: 2014-2018 ACS 5-Year Data Profile

Data https://data.census.gov/cedsci/table?d=ACS%205-

Source Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP03&g=0400000US01_0500000US01077&hidePreview=false&t=%3A%3A%

Comments:

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the American Community Survey the three major employment sectors in the City of Florence business and financial management, office sales and service.

Describe the workforce and infrastructure needs of the business community:

There are 12,676 workers in the major employment sectors with the city of Florence.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

There is currently no major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The skills and education of the current workforce correspond well to the employment opportunities in the city as jobs grow with the people within the area.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workers have pently of opperortunities to train in the area with initiatives supported by the Univeristy of North Alabama and Chamber of Commerce through Build Alabama.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

The City will continue to look for additional resources that address economic development.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Yes, HUD defines concentrations as an area of a large number of characteristics. The majority of substandard housing is geographically located in the east and west portions of the city. These units, by nature of their age and obsolescence, exhibit multiple housing problems identified in the Needs Assessment. This concentration is based on the location of LMI populations by Census block group.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Yes, HUD defines concentrations as an area of a large number of characteristics. The East Florence and West Florence geographic areas within the City hold the highest concentration of ethnic minorities or low-income families. This concentration has been determined by Census block group.

What are the characteristics of the market in these areas/neighborhoods?

These areas are characterized by aging housing, a high concentration of low income renters and home owners, high unemployment, and blighted properties.

Are there any community assets in these areas/neighborhoods?

Community assets in East Florence include a recently developed park and splash pad. A new hospital was recently built in East Florence. The previous hospital was demolished in West Florence. There is a Central Business District in West Florence; however over the years it has become dilapidated and has been identified as a need and will be addressed throughout the next five years with spot blight, and public facilities and infrastructure funds. West Florence is located closest to downtown Florence and the University of North Alabama.

Are there other strategic opportunities in any of these areas?

Future opportunities may be available for CDBG funds to be used as leverage in these areas.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Enter in the data

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Enter in the data

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

This jurisdiction increased natural hazard risks associated with climate change are wetter winters with hotter and dry summers. We also sit in the Dixie Alley, the southern belt of tornadoes, which shows an increase in strong or violent tornadoes.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Due to these increases the risks are turning into moderate risks of housing occupied by low- and moderate-income households since most housholds in the city has limited to no shelters to weather out the storms.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The mission of the City of Florence is to identify and address the needs of its citizens. Those needs were addressed throughout our Citizen Participation Process and the history of the Community Development programs. The basic priority projects expressed by local citizens are: Public services that assist low income individuals with various needs. Particularly those that are in nature of youth and senior services, transportation, health programs, food banks, and security deposits. Additional projects expressed by citizens and approved by HUD are spot blight removal, public facilities and infrastructure improvements, and residential rehabilitation.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 48 - Geographic Priority Areas

1 Area Name:		East Florence Entitlement Area				
Area Type:		Local Target area				
Other Target Area Descrip	tion:					
HUD Approval Date:						
% of Low/ Mod:						
Revital Type:		Comprehensive				
Other Revital Description:						
Identify the neighborhood this target area.	l boundaries for	Please see Maps section - City of Florence Entitlement Geography.				
Include specific housing as characteristics of this targ		This target area is primarily single family residential. The majority of the businesses have been closed and are deemed blighted properties.				
How did your consultation participation process help this neighborhood as a tar	you to identify	Residents who live and work in this area actively participate in quarterly community meetings. The staf also receives correspondence via e-mail, phone, and walk-in traffic concerning blighted properties, infrastructure in need of repair, as well as redevelopment opportunities and ideas therefore.				
Identify the needs in this t	target area.	Residential Rehabilitation, Public Service for the Community, Public Improvement projects targeting Public locations, and blight removal.				
What are the opportunities improvement in this target		North Alabama Medical Center was recently completed along the western boundary of the target area. Long range plans include provisions for medical and commerical support developments as well as improved infrastructure.				
Are there barriers to improtarget area?	ovement in this	Current barriers include: a large number of absentee owners of residential property which comprise the majority of those identified as blighted, lack of commerical revenue stream, and lack of neighborhood stability due to transient residents and sub-standard housing.				

2					
2	Area Name:	Spot Blighted Areas			
	Area Type:	Local Target area			
	Other Target Area Description:				
	HUD Approval Date:				
	% of Low/ Mod:				
	Revital Type:	Comprehensive			
	Other Revital Description:				
	Identify the neighborhood boundaries for this target area.	Our Spot Blight Program has no specific boundaries identified. The goals is to eliminate blighted properties through the process of general clean-up and demolition. The property owner is required to sign access for this process to take place.			
	Include specific housing and commercial characteristics of this target area.	Our Spot Blight Program deals with owner-abandoned properties that the Building Department have deemed a hazard to the community.			
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City of Florence Building Department oversees the determination of blighted properties.			
	Identify the needs in this target area.	Provide a safer environment for the areas that the homes are located in.			
	What are the opportunities for improvement in this target area?	By removing and cleaning up these blighted areas; additional residential housing can be developed.			
	Are there barriers to improvement in this target area?	Lack of owner partipation in the removal process and absence of re-development.			
3	Area Name:	West Florence Entiltlement			
	Area Type:	Local Target area			
	Other Target Area Description:				
	HUD Approval Date:				
	% of Low/ Mod:				
	Revital Type:	Comprehensive			
	Other Revital Description:				
	Identify the neighborhood boundaries for this target area.	Please see Maps section - City of Florence Entitlement Geography.			

Include specific housing and commercial characteristics of this target area.	This target area is primarily single family residential. The majority of the businesses have been closed and are deemed blighted properties.				
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The staff receives correspondence via e-mail, phone, and walk-in traffic concerning blighted properties, infrastructure in need of repair, as well as redevelopment opportunities and ideas therefore. This area is also very active in our Residential Rehabilitation program.				
Identify the needs in this target area.	Residential Rehabilitation, public improvements, and blight removal.				
What are the opportunities for improvement in this target area?	The West Florence area barriers of access in place. There are few major streets that lead to this area. The City continues to apply for funds that will help with the accessibility of this area.				
Are there barriers to improvement in this target area?	Lack of additional resources to assist in public improvements.				

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Low and Moderate income households are located throughout the City of Florence, however the greatest concentrations being in East and West Florence. According to the 2010 census data, the total population for the West Florence Entitlement Area had 2,667 people with a low/mod percentage of 77.83. The East Florence entitlement area had a population of 5,091 people and a low/mod percentage of 65.62. See Appendix A - Florence Entitlement Map

The goal of the City is to utilize funds granted by the Community Development Block Grant program to provide qualified communities and individuals decent housing, expanded economic opportunities, and a suitable living environment. Although the East and West Florence communities are a primary focus under the CDBG program, spot assistance will be utilized citywide for persons or areas that qualify based on federal requirements.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 49 - Priority Needs Summary

1	ble 49 – Priority Ne	
-	Priority Need	Public Services
	Name	
	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Rural
		Chronic Homelessness
		Individuals
		Families with Children
		Mentally III
		Chronic Substance Abuse
		veterans
		Persons with HIV/AIDS
		Victims of Domestic Violence
		Unaccompanied Youth
		Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
		Persons with Alcohol or Other Addictions
		Persons with HIV/AIDS and their Families
		Victims of Domestic Violence
	Geographic	West Florence Entiltlement
	Areas	East Florence Entitlement Area
	Affected	Spot Blighted Areas
	Associated	Residential Rehabilitation
	Goals	Public Services
		Administration

	Description	The City of Florence Public Service entities that will be awarded during the 2020-2025 grant years, provide a wide array of services. Their main focus is assisting low and moderate income individuals and families. The public service providers that have been selected are carrying out activities that address major community development needs such as youth and elderly services, health services, housing and transportation needs, self-sufficiency, alcohol and drug abuse rehabilitation, domestic violence, and job training.
	Basis for Relative Priority	The public service organizations that are funded with the City's CDBG grant provides services to low/moderate income individuals within the City of Florence. They meet at least one, if not all of HUDS National Objectives.
2	Priority Need Name	Public Improvements
	Priority Level	High
		Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally III Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence
		Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

	Geographic	West Florence Entiltlement
	Areas	East Florence Entitlement Area
	Affected	Spot Blighted Areas
	Associated	Residential Rehabilitation
	Goals	Public Facilities and Infrastructure Improvements
		Administration
	Description	Public Facilities improvements are detrimental to maintaining the establishments
		for the community. These facilities include community and senior centers, public recreation facilities, public safety departments, public service entities, etc.
	Basis for	The majority of public facilities projects that are deemed high priorities are located
	Relative	within the East and West Florence Low/Mod areas of the City. These projects meet
	Priority	at least one if not all of HUDS National Objectives.
3	Priority Need	Blight Removal
	Name	Digital Nemotal
	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
	Geographic	West Florence Entiltlement
	Areas	East Florence Entitlement Area
	Affected	Spot Blighted Areas
	Associated	Residential Rehabilitation
	Goals	Spot Blight Removal
	Goals	Administration
	Description	The City of Florence CD Program funds activities through blight removal in order to
		clean up dilapidated properties and ensure safety for the community.
	Basis for	Blighted properties are located City Wide in Florence. It is important for the safety
	Relative	and welfare of the community to eliminate these areas and in return offer available
	Priority	space for additional growth. This project meets at least one if not all of HUDS National Objectives.

Narrative (Optional)

The City of Florence anticipates over the next five years to continue to utilize CDBG funds to administer the Community Development program, fund activities through public service entities, address public facilities and improvement needs, and cleanup blighted areas throughout the City, and increase housing

for low to moderately income individuals and families thru Homeownership Assistance and Residential Rehab.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable	Market Characteristics that will influence
Housing Type	the use of funds available for housing type
Tenant Based	Florence Housing Authority is now set up to only assist clients with tenant based
Rental Assistance	rental assistance.
(TBRA)	
TBRA for Non-	
Homeless Special	
Needs	
New Unit	
Production	
Rehabilitation	Data indicates that a large majority of housing units within the City have the
	potential to contain lead-based paint. These units would mostly be located
	throughout the City since about half of the existing housing stock was constructed
	before 1978. While the City has seen some redevelopment, there is also a large
	portion of the housing that is aged and obsolete. The City continues to focus its
	efforts of creating new affordable units and also rehabilitating existing units. The
	City is proactive through its Code Enforcement programs to ensure the housing
	stock is maintained at standard condition. Housing Rehabilitation is available
	for single family housing units occupied by LMI individuals thru a partnership with
	Shoals Habitat for Humanity.
Acquisition,	The City of Florence recognizes that affordable housing units are in need. The City
including	also recognizes that due to the rising costs of land values and building materials it
preservation	will make it increasingly difficult for developers to maintain the lower rents that
	make some of the existing housing affordable. Areas where new units have been
	developed show housing costs exceed what would be considered affordable by
	HUD definition.

Table 50 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City anticipates receiving CDBG funding and program income funds will be available to implement its strategic plan. These funds will be used for various projects as outlined below and in section *AP-35*, *Projects*.

Anticipated Resources

Program	Source of	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						
	federal	Admin and Planning						
		Economic						
		Development						
		Housing						
		Public Improvements						
		Public Services	327,756	23,651	0	351,407	0	

Table 51 - Anticipated Resources

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

There are no matching requirements for CDBG. However, CDBG funds are a major source of funding to continue to address the needs of low to moderately income community needs. In the City of Florence, these funds will be used to administer the program; fund public service entities; provide funding for the removal and clean-up of blighted properties on a city wide basis; residential rehabilitation of single family homes; implement and improve public infrastructure and generate a program for home buyers assistance.

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 City does not anticipate the need for any land acquisition as it relates to the proposed projects.

Discussion

All funds will be allocated and expended in alignment with the strategic goals of the five-year plan, priority needs and funding allocations under the Annual Action Plan.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity	Role	Geographic Area Served
	Туре		
CITY OF FLORENCE	Government	Non-homeless special	Jurisdiction
		needs	
		Planning	
		public facilities	
		public services	

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Florence has administered the CDBG program since the 1980's and will continue to partner with approved public service providers to deliver identified needs. The City will the execute the projects described in the Consolidated Plan through procurement and contracting of services. Plan implementation is carried out by the Departments of Planning and Community Development with oversite by city administration (mayor and city council). The City as the lead agency is responsible for procurement of services from outside vendors.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention	Available in the	Targeted to	Targeted to People					
Services	Community	Homeless	with HIV					
Homelessness Prevention Services								
Counseling/Advocacy	Χ	X	X					
Legal Assistance	Χ							
Mortgage Assistance	Х							
Rental Assistance	Х	Х						
Utilities Assistance	Х							
	Street Outreach S	ervices						
Law Enforcement	Χ							
Mobile Clinics								
Other Street Outreach Services	Х							
	Supportive Ser	vices						
Alcohol & Drug Abuse	Х	Х						
Child Care	Х							
Education	Х							

Employment and Employment					
Training	X	X			
Healthcare	X				
HIV/AIDS	X		Х		
Life Skills	X				
Mental Health Counseling	Х				
Transportation	X				
Other					

Table 53 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

While there are agencies that provide homeless services and housing options in Florence and Lauderdale County, the needs are identified by the Homeless Care Council of Northwest Alabama (HCCNWAL). The HCCNWAL covers six adjacent counties, therefore without data that clearly documents homeless needs specific to the City of Florence it is difficult to discuss such needs. The City of Florence supports the HCCNWAL and funds eligible activities proposed by the CoC with CDBG funds to combat or address homelessness needs.

The City relies on Thrive Alabama for information regarding the needs for programs, services, and housing for person with HIV/Aids and their families in Florence. The City is not seeking funds from the HOPWA program.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The City currently does not have the organizational capacity to address the needs of the homeless population and/or persons with special needs. The City relies on other agencies currently providing those services and the Continuum of Care designated by HUD.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City of Florence will continue to involve available resource entities to ensure that information is passed on and received in order to offer the best information to our citizens.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Residential	2020	2025	Affordable Housing	West Florence	Public Services	CDBG:	Homeowner Housing
	Rehabilitation			0	Entiltlement	Public	\$50,000	Rehabilitated:
					East Florence	Improvements	, ,	3 Household Housing Unit
					Entitlement	Blight Removal		
					Area	g		
					Spot Blighted			
					Areas			
2	Spot Blight Removal	2020	2025	Non-Housing	Spot Blighted	Blight Removal	CDBG:	Buildings Demolished:
				Community	Areas		\$50,000	4 Buildings
				Development				Ç
3	Public Facilities and	2020	2025	Public Facilities and	West Florence	Public	CDBG:	Public Facility or
	Infrastructure			Infrastructure	Entiltlement	Improvements	\$126,407	Infrastructure Activities other
	Improvements			Improvements	East Florence			than Low/Moderate Income
					Entitlement			Housing Benefit:
					Area			1000 Persons Assisted
					Spot Blighted			
					Areas			
4	Public Services	2020	2025	Public Services	West Florence	Public Services	CDBG:	Public service activities other
					Entiltlement		\$55,000	than Low/Moderate Income
					East Florence			Housing Benefit:
					Entitlement			1000 Persons Assisted
					Area			
					Spot Blighted			
					Areas			

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
5	Administration	2020	2025	Administration	West Florence	Public Services	CDBG:	Other:
					Entiltlement	Public	\$70,000	1 Other
					East Florence	Improvements		
					Entitlement	Blight Removal		
					Area			
					Spot Blighted			
					Areas			

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Residential Rehabilitation
	Goal Description	The Florence Residential Rehabilitation is a partnership with Shoals Habitat for Humanity. Individuals seeking assistance apply with the Shoals Habitat to become a part of their program to receive emergency repairs to their home.
2	Goal Name	Spot Blight Removal
	Goal Description	The Florence Community Development Spot Blight Removal program is a partnership with the Florence Building Department. Local properties are reported to the Building Department via complaint process. The Building Department contacts the homeowners to see why the property became dilapidated. Arrangements are made for the CDBG program to clean up the property with Federal funding.
3	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	The City of Florence Public Facilities and Infrastructure Improvements are important to maintaining public facilities and infrastructur for the community. These facilities may include community and senior centers, public recreation facilities, public service entities, etc.

4	Goal Name	Public Services				
	Goal Description	The City of Florence Public Service Grant Program is reserved for servicing residents within the city limits of Florence, Alabama exclusively. Applicants must be a qualified nonprofit organization with current 501(c) (3) status or a public organization. All services provided must meet at least one of three national objectives defined by HUD.				
		Applications to the 2020-2025 Public Service Grant Program must be a direct service aligned to at least one of the following activities allowed by HUD under 24 CFR 570.201:				
		Youth Services (05D) Transportation Services (05E)				
		Senior Services (05A) Health Services (05M)				
		Food Banks (05W) Security Deposits (05Q)				
		Applicants are required to demonstrate and document coordination with other local service providers. The Performance Period is May 1 thru April 30. The City of Florence will execute annual agreements with each funded organization.				
5	Goal Name	Administration				
	Goal Description	The City of Florence administration activity is for the management and oversight of the CDBG Program to ensure good stewardship. Administrative funds address salaries, office equipment, travel and education, and planning.				

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City will partners with local agencies to assist families with affordable housing needs such as down payment and closing costs. The City relies on the Florence Housing Authority for provision of rental programs for low- and moderate-income families. The Florence Housing Authority (FHA) is a separate entity, which owns and operates the multifamily housing program in the City. The Housing Authority administers the Section 8 Housing Choice Voucher Program, which currently assists 691 families.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Currently the Florence Housing Authority manages of 665 housing units in six developments. In accordance with HUD regulations the Florence Housing Authority is as a Multifamily Housing Agency, which they participates in the HUD Housing Choice Vouchers program.

Activities to Increase Resident Involvements

Not Applicable. The City's Public Housing Authority is deemed a "High Performer" by HUD.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

Not Applicable. The City's Public Housing Authority is deemed a "High Performer" by HUD.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Florence provides the following outline of barriers to affordable housing. Through information provided by Florence Housing Authority, local governments, and the Analysis of Impediments, the following barriers were noted.

- 1. Lack of Decent Afforable Housing Units: Majority of the affordable housing stock has not been maintained by the Landlord. Therefore, some of the units are non-compliant with local building regulations.
- 2. Credit Environment: Lending institutions have become conservative and restrictive in their lending practices.
- 3. Costs Associated with Renovations: Accessible housing units can be more costsly to renovate when the exsting structure is dated and the safety unknown.
- 4. Costs Associated with New Construction: The builing costs for new construction is
- 5. Educating the Community and Developers on Benefits of Affordable Housing:

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In an effort to eliminate barriers to affordable housing, the City of Florence, through the Housing Rehabilitation Program, assists owners with modifications needed for accessibility, accommodations, and continue to fund Public Services that address these needs. The City of Florence also has proposals to work with local lenders and nonprofit groups to offer credit repair assistance to Low Moderate I interested in purchasing a home within the Florence city limits. Through its comprehensive plan, the city encourages mixed use development including knowing types. Development are encourage to coninder infill development to stabilize neighborhood and prenvent sprayel which creates additional barrers such as transportation and accenebility. The city also manages an EPA Brownfield grant trargeting the study, cleanup, and redevelopment of forever industrevelment of former industrual situs in Low Moderate Areas.

SP-60 Homelessness Strategy – 91.215(d)

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

The City is not proposing to use any CDBG funds to directly combat or address homelessness. The City of Florence has representation on the local Continuum of Care board of directors and is heavily involved with the Homeless Care Council of Northwest Alabama (HCCNWA). The HCCNWA hosts a general membership meeting four times a year to give anyone in the communities the opportunity to meet and network with other agencies and individuals interested in the needs of the homeless populations. The HCCNWA partners with several agencies such as United Way, Community Action, Safeplace, the Help Center, to provide direct relief to our homeless populations with events such as Hydrate the Homeless, a one-day event during the hot months to provide water and heat relief items to the homeless in our community. The HCCNWA also supports Community Action, the Help Center, St. vincent de Paul, and Room at the Inn which give referrals for homeless persons regarding housing, healthcare, mental health care, food, and clothing.

Addressing the emergency and transitional housing needs of homeless persons

The City of Florence does not receive direct allocations from HUD homeless grant funds. All funds that may assist homeless persons are obtained through the competitive grant process. The City was awarded funding in the 2019 Emergency Solutions Grants (ESG) from the Alabama Department of Economic and Community Affairs (ADECA) to fill service gaps. These funds support shelter operations and essential services activities through non profit agencies that serve homeless persons such as the Salvation Army, Safeplace, and Community Action Agency of Northwest Alabama. The programs will fill service gaps within the Continuum of Care service area.

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.

While there are agencies that provide homeless services and housing options in Florence. There is currently no data that clearly documents homeless needs specific to Florence, therefore it is difficult to discuss such needs. It is also important to note that the 2019 HCCNWAL point-in-time homeless data did not identify homeless persons by jurisdiction. However, Florence has not proposed a strategy for rapid-rehousing and will rather rely on the area's public service agencies.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City's strategy is to continue to support Public Service agencies located within the City providing these services.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

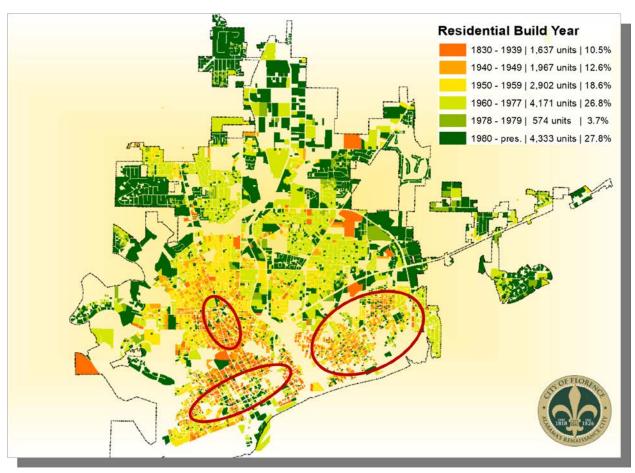
There are three general areas within the City of Florence where a high percentage of homes date prior to 1978. The CDBG Program is required to comply with HUD Lead Safe Housing Regulations. In situations where emergency repairs are needed and the home does not require emergency assistance that would trigger compliance with HUD Regulation 24 CFR Part 35 the City refers clients to Shoals Habitat for Humanity. This non-profit organization completes home repairs in a low-cost, efficient manner. In 2020, the City of Florence will apply to the office of **Lead Hazard Control** and **Healthy Homes** (OLHCHH) for funding to develop cost-effective ways to reduce **lead-based paint hazards**.

How are the actions listed above related to the extent of lead poisoning and hazards?

Due to limited funds available within the Community Development Block Grant for these projects; the City of Florence has modified its rehab program to only offer residential rehabilitation assistance to individuals whose home was built after 1978. If the home is designated as an emergency project, Shoals Habitat will comply with 24 CFR Part 35 of the regulations and ensure proper remediation. The City will attend trainings when made available that discuss these environmental issues, and contract with companies that certified to deal with lead based paint

How are the actions listed above integrated into housing policies and procedures?

The City of Florence Policy and Procedures Manual for Residential Rehabilitation addresses the issue of LBP. Please refer to the Residential Rehab Policies and Procedures Manual: Internal Office Procedures #3.



Residential Build Year with Low-Mod Notations

Florence Age of Housing

SP-70 Anti-Poverty Strategy - 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The core premise of the anti-poverty strategy is that employment is the way through which those who are impoverished can best achieve the goal of self-sufficiency. The most efficient method for reaching this goal is for the City to strive for an economic climate that leads to the availability of a wide range of possible jobs available for these individuals. The Shoals Chamber of Commerce thru the Workforce Readiness Program focuses on positive partnerships that can lead to opportunities for any individual in the Shoals area seeking employment. Shoals Career Center has training programs in the City of Florence and thruout the Shoals area. These programs promote a strong workforce and assist in the reduction on poverty-level families.

The City's primary strategy is to coordinate with the Chamber and other agencies to determine if programs or partnerships with public service agencies could help the City achieve a reasonable antipoverty strategy through workforce development.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City's affordable housing strategy to limit barriers to affordable housing is to partner with established programs like Florence Housing Authority's Social Services Programs and the Homeless Care Council of Northwest Alabama (HCCNWAL). These types of partnerships coincide with supporting a wide range of businesses with potential employment opportunities for individuals with varying skill sets.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

See Monitoring Policy's and Procedures

Expected Resources

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

Introduction

The City anticipates receiving CDBG funding and program income funds will be available to implement its strategic plan. These funds will be used for various projects as outlined below and in section *AP-35*, *Projects*.

Anticipated Resources

Program	Source of	Uses of Funds	Ехр	ected Amount	: Available Year	1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						
	federal	Admin and Planning						
		Economic						
		Development						
		Housing						
		Public Improvements						
		Public Services	327,756	23,651	0	351,407	0	

Table 55 - 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

There are no matching requirements for CDBG. However, CDBG funds are a major source of funding to continue to address the needs of low to moderately income community needs. In the City of Florence, these funds will be used to administer the program; fund public service entities;

provide funding for the removal and clean-up of blighted properties on a city wide basis; residential rehabilitation of single family homes; implement and improve public infrastructure and generate a program for home buyers assistance.

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 City does not anticipate the need for any land acquisition as it relates to the proposed projects.

Discussion

All funds will be allocated and expended in alignment with the strategic goals of the five-year plan, priority needs and funding allocations under the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
1	Residential	2020	2025	Affordable Housing	West Florence	Public Services	CDBG:	Homeowner Housing
	Rehabilitation				Entiltlement	Public	\$50,000	Rehabilitated: 5 Household
					East Florence	Improvements		Housing Unit
					Entitlement	Blight Removal		
					Area			
					Spot Blighted			
					Areas			
2	Spot Blight Removal	2020	2025	Non-Housing	Spot Blighted	Blight Removal	CDBG:	Buildings Demolished: 4
				Community	Areas		\$50,000	Buildings
				Development				
3	Administration	2020	2025	Administration	West Florence	Public Services	CDBG:	Other: 1 Other
					Entiltlement	Public	\$65,500	
					East Florence	Improvements		
					Entitlement	Blight Removal		
					Area			
					Spot Blighted			
					Areas			

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
4	Public Services	2020	2025	Public Services	West Florence	Public Services	CDBG:	Public service activities other
					Entiltlement		\$49,100	than Low/Moderate Income
					East Florence			Housing Benefit: 500 Persons
					Entitlement			Assisted
					Area			
					Spot Blighted			
					Areas			
5	Public Facilities and	2020	2025	Public Facilities and	West Florence	Public Services	CDBG:	Public Facility or Infrastructure
	Infrastructure			Infrastructure	Entiltlement	Public	\$116,800	Activities other than
	Improvements			Improvements	East Florence	Improvements		Low/Moderate Income Housing
					Entitlement	Blight Removal		Benefit: 100 Persons Assisted
					Area			
					Spot Blighted			
					Areas			

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Residential Rehabilitation
	Goal	Funds will be used to provide emergency rehabilitation to residential housing units.
	Description	
2	Goal Name	Spot Blight Removal
	Goal	Clearance, demolition, and removal of buildings and improvements, including movement of structures to other sites and
	Description	remediation of know or suspected environmental contamination.

3	Goal Name	Administration				
	Goal Description	Overall program administration, including (but not limited to) salaries, wages, and related costs of staff or others engaged in program management, monitoring, and evaluation.				
4	Goal Name	Public Services				
	Goal Description	• 2021-2025 Public Service Grant Program must be a direct service aligned to at least one of the following activities allowed by HUD under 24 CFR 570.201:				
		1. Senior Services (05A)				
		2. Youth Services (05D)				
		3. Transportation Services (05E)				
		4. Health Services (05M)				
		5. Security Deposits (05Q)				
		6. Food Banks (05W)				
5	Goal Name	Public Facilities and Infrastructure Improvements				
	Goal	Reconstruction, rehabilitation or installation of public facilities and improvements				
	Description					

Projects

AP-35 Projects - 91.220(d)

Introduction

The City of Florence carries out five projects thru the Community Development Block Grant each year. These projects are designed to carry out a specific requests from the citizens we serve.

Projects

#	Project Name
1	Program Administration
2	Public Services
3	Spot Blight
4	Residential Rehabilitation
5	Public Facilities and Improvements

Table 57 – 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	Program Administration
	Target Area	West Florence Entiltlement East Florence Entitlement Area Spot Blighted Areas
	Goals Supported	Administration
	Needs Addressed	Public Services Public Improvements Blight Removal
	Funding	CDBG: \$70,000
	Description	Program administration funds will be used for salary and fridge and travel for the Community Development staff. It will also cover the purchase of office material and supplies to carry out activities.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	110 W College Street, Suite 115 Florence, AL 35630
	Planned Activities	
2	Project Name	Public Services
	Target Area	West Florence Entiltlement East Florence Entitlement Area Spot Blighted Areas
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$52,000
	Description	Public Services funds will be utilized by funding agencies that provide services to the mow and moderate income citizens of the City of Florence.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Low and Moderately income families Estimates 1,000 individuals served with CDBG Public Services funds.
	Location Description	

	Planned Activities	
3	Project Name	Spot Blight
	Target Area	Spot Blighted Areas
	Goals Supported	Spot Blight Removal
	Needs Addressed	Blight Removal
	Funding	CDBG: \$50,000
	Description	Spot Blight project will fund the clean up of blighted properties in the City of Florence. Asbestos testing and remediation is included in this project as well as the demolition of any necessary structures.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Florence estimates that 4 locations will be demolished with CDBG blight funds.
	Location Description	1. 724 E Mobile Street
		2. 118 S Cherokee Street
		3.
		4.
	Planned Activities	Asbestos Abatement and demolition
4	Project Name	Residential Rehabilitation
	Target Area	West Florence Entiltlement East Florence Entitlement Area Spot Blighted Areas
	Goals Supported	Residential Rehabilitation
	Needs Addressed	Public Services Public Improvements Blight Removal
	Funding	CDBG: \$50,000
	Description	The Residential Rehabilitation project will consist of a partnership between the City of Florence and the Shoals Habitat for Humanity (SHH). Shoals Habitat will provide all residential rehabilitation services including but not limited to client income eligibility, environmental reviews in HEROs, procurement of services, davis-bacon wage laws, and carrying out the project.

	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Florence estimates that Shoals Habitat for Humanity will serve 4 clients with residential rehabilitation services.
	Location Description	1. 1718 Maple Avenue
		2. 225 Britt Street
		3. 2237 Randolph Street
		4.
	Planned Activities	Windows, Doors, Roof, HVAC, Hot Water Heaters
5	Project Name	Public Facilities and Improvements
	Target Area	West Florence Entiltlement
		East Florence Entitlement Area
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$129,407
	Description	Public Facilities and Improvement project will consist of projects that are meant to assist those in the low and moderate income areas of Florence. Projects could include bus stops, street repairs, sidewalks, parks, and other improvements to public facilities.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	1. Bus Shelter at Salvation Army of the Shoals located at 1601 Huntsville Rd. Florence, AL 35630
		2. Tennis Wall at Veterans Park located at 100 Veterans Park Dr. Florence, AL 35630
		3.
	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

Assistance will be directed to the target areas identified during the needs assessment. These areas have concentrations of LMI and minority populations.

Geographic Distribution

Target Area	Percentage of Funds
West Florence Entiltlement	45
East Florence Entitlement Area	45
Spot Blighted Areas	10

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

These area represent some of the oldest communities within Florence. The social, economic and physical elements of these areas support the rational for them as target areas.

Discussion

Common characteristics among these areas are:

- higher percentages of households living below poverty
- lower median incomes/over 40% of population are low/moderate income
- lower per capita incomes
- larger decline in median family income

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

To address affordable housing needs in the City of Florence, the City is proposing to begin a homeownership assistance program. This program provides assistance to low- and moderate-income families seeking to purchase homes. The City will also continue the Residential Rehabilitation program through a partnership with Shoals Habitat for Humanity.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	4
Special-Needs	0
Total	4

Table 59 - 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	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	5

Table 60 - One Year Goals for Affordable Housing by Support Type Discussion

The City of Florence maintains zoning and development requirements, actucally it reduces and creates equity amoung builders which lowers cost. However, to ensure a stable and quality housing stock, these standards are deemed necessary. The Community Development Department will continue to monitor the effects of zoning and development requirements, as related to affordable housing.

AP-60 Public Housing - 91.220(h)

Introduction

Florence Housing Authority owns and operates 722 housing units in eight developments. The Housing Authority's waiting list is open for all bedroom sizes. Florence Housing Authority administers 691 Housing Choice Vouchers. These stay fully utilized. The waiting list is currently open and there are 947 applicants on the waiting list.

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

We will continue to support several Public Service Agencies that assist low to moderately income individuals and families with public housing needs. For example, Florence Housing Authority has projects funded under our Public Services. FHA has a transit program that will provide transportation to any of the public housing residents on a daily basis during to and from work, shopping, banking, and medical appointments. Public housing residents are supported by other local agencies in the area that do not receive CDBG funding however, we are always searching for new, innovative way to serve every client.

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

The City of Florence will continue to advertise in the Courier Journal, on the City website, through the local library, the Homeless Management Information Systems bulletin, through the local Continuum of Care and the City's social media sites and email blasts. We will also email Florence Housing Authority and ask them to post information regarding our meetings on their housing bulletin.

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

Not Applicable

Discussion

The low income population does not have the financial resources to fund relocation for better jobs and schools. In addition, it is more difficult for this high risk population to discover, travel to and apply for public services such as food stamps, housing, Medicare, Medicaid and public assistance. Most of these services are converting to computer assess with all the related individual security which adds still another large obstacle to the obtaining of the services which provide the foundation for basic living needed to start on the path of advancement to self-sufficiency. The City of Florence will continue to fund public services that address the needs of its low/moderate income citizens.

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

The City of Florence works with the public service Homeless Care Council of Northwest Alabama. This partnership allows the City to participate in events and coordinate with other agencies that provide assistance to the local homeless and special needs.

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 HCCNWA will reach out to homeless persons (especially unsheltered persons) during the next year by hosting a Project Homeless Connect event. This event will bring together all of the local Community Service Providers, including the local emergency shelters, Florence Housing Authority, Local government for State Issued IDs, local transportation representatives, Social Security Disability, healthcare providers, and mental health providers. At this event, all of the needs of the homeless, from proper documentation to healthcare, can be addressed in one environment and in a one-day setting. This will alleviate the major problem the homeless have in accessing resources in a timely manner. It will also allow for an additional count of the homeless using registration information similar to that used in the PIT.

The HCCNWA will promote this event through the local media channels, such as newspaper, television and radio, along with promotion of the event through social media. The HCCNWA will also coordinate distributing information about this event through the public library, one of the most common places that the homeless spend their days. Lastly, the HCCNWA will work with Homeless Street Activists to publicize this event among members of the more hidden homeless population.

Another one-year goal of the HCCNWA is to launch an education campaign about homelessness, beginning with a series of articles in the local newspaper that helps make the public aware of issues that the homeless face, along with understanding reasons people become homeless and ways the community can support the effort to shelter and re-house the homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HCCNWA has a one-year goal of helping address the emergency shelter and transitional housing needs of the homeless by continuing to support new emergency shelters like Room in the Inn Shoals, and by applying for funding that can increase the amount of monies available for transitional housing units in the area. Additionally, the HCCNWA plans to partner with NACOLG to provide more reliable transportation to the emergency shelters so that more people can access shelter when it is needed.

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 HCCNWA has the one year goal of working together with local community service providers to collaborate on a "Homeless Resource Information Guide" that can be distributed locally to interfaith agencies, jails, hospitals, libraries, city school homeless liaisons, and other community service providers that lists the contact information for emergency shelters, Community Action Agency, NACOLG (the local transportation resource) and Florence Housing Authority, so that when homeless persons come to those agencies for help, the same information is given to them. The Homeless Resource Information Guide can be used to point homeless people directly to the needed services to transition to permanent housing and independent living, along with resources that can be used to keep them from becoming homeless again.

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 HCCNWA has the one-year goal of continuing to support 211, a local referral information service, by collaborating on any new information about services. Additionally, the HCCNWA has the one-year goal of increasing their General Membership and Board of Directors to include more community representatives from health care facilities, foster care facilities, and mental health treatment facilities. The HCCNWA additionally has the one-year goal of expanding the number of community service providers that collect and maintain HMIS data. They will do this by offering trainings on HMIS Data Entry, as well as further expanding the software that is used to collect HMIS data so that it is more user friendly. This expansion of HMIS Data collection will help low-income individuals and families by streamlining data used by community service providers to make sure that adequate assistance is being offered to homeless clients, as well as homeless clients within each special population.

Discussion

The City of Florence will continue to work with the Homeless Care Council of Northwest Alabama and it's member agencies to assist those in the area with homeless prevention and re-housing.

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

Introduction:

The City of Florence provides the following outline of barriers to affordable housing. Through information provided by Florence Housing Authority, local governments, and the Analysis of Impediments, the following barriers were noted.

- 1. Land Use Restrictions: Land use regulations have been recognized for some time as a possible impediment to affordable housing. Landmark cases addressing "exclusionary zoning" were undertaken where suburban cities were cited for in engaging in land use practices that would effectively eliminate the poor, and thereby disproportionately minorities, from their jurisdictions. Thus, the potential for misuse of land use regulations is usually on any list of items to be scrutinized for negative impact on housing affordability or accessibility. Generally, the most important land use regulations are the zoning ordinance and the subdivision regulations. Land use regulations in Alabama can impose additional cost to housing in a variety of ways.
- 2. Building Codes: Similar to land use regulations, over the years a number of builders and advocates of affordable housing have stated that building and housing codes were housing affordability impediments. The codes are often lumped together with zoning ordinances and other land use regulations and it can be unclear to some as where one begins and the other ends. Governmental building codes are often expressed in terms of rigid specifications that can be difficult or costly to comply with. New or different construction techniques and architectural innovations would be satisfactory in terms of safety, comfort, and other measurable standards but are not in compliance unless they meet strict code specifications. Arbitrary and inconsistent building code enforcement has also been cited as a source of additional expense for builders who can be unduly delayed in their construction and/or forced to undertake costly redesigns. As with the land use regulations, building codes in Alabama are adopted and practiced for the most part in the entitlement communities and much of the rural areas in the state are devoid of building code adoption and enforcement.
- 3. Credit Environment: With the exception of "bubble" years that occurred in the past, lending institutions have historically been conservative and restrictive in their lending practices.
- 4. The NIMBY Syndrome: The NIMBY barrier can be viewed as a classic "haves versus the have-nots" situation where low and moderate income households suffer due to an instinctive response from established communities and neighborhoods. Neighbors affected by the proposed development often have fears and concerns about their property values, crime, traffic congestion, loss of open space, new neighbors and design compatibility.
- 5. Land Ownership Patterns: Much of the suitable land for development is owned or controlled by a few owners or developers. In these areas owners can generally dictate the extent of housing activity to be carried out on their land. They can also be more selective in dealings to ensure maximum

profitability, usually diminishing or precluding affordable housing opportunities for lower income households.

6. Costs Associated With Accessibility Compliance: Accessible housing units can be more costly to construct and the required renovations to existing structures can be especially costly for older structures.

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 an effort to maintain and support affordable housing the city provides low interest loans to low and moderate income homeowners and deferred loans to very low income elderly and disabled homeowners. The City has also supported applications by developers and non-profit agencies applications being made through other programs to provide affordable housing.

Discussion:

In an effort to eliminate barriers to affordable housing the City through the housing rehabilitation program assists owners with modifications needed for accessibility accommodations and continue to fund Public Services to address these needs.

AP-85 Other Actions – 91.220(k)

Introduction:

The following strategies will continue to be a high priority for the City's CDBG Program: affordable housing, remediation and the availability of information on lead based paint, minimize the number of poverty-level families, institutional structure, and coordination with other resources that have the same goals.

Actions planned to address obstacles to meeting underserved needs

The City of Florence currently has an excellent network of service and support agencies that satisfy most needs of residents within the city, as a result there are no major identified underserved needs. The primary obstacle to meeting underserved needs is lack of funding. As a result of budget cuts agencies are required to come up with new and sometimes innovative means of raising the needed funds.

Actions planned to foster and maintain affordable housing

In an effort to maintain and support affordable housing the city provides low interest loans to low and moderate income homeowners and deferred loans to very low income elderly and disabled homeowners. The City has also supported applications by developers and non-profit agencies applications being made through other programs to provide affordable housing

Actions planned to reduce lead-based paint hazards

In an effort to evaluate and reduce lead based paint hazards owners of properties constructed prior to 1978 are informed that the property may contain lead-based paint, the hazards of such paint, symptoms and treatment for lead-based paint poisoning. The Alabama Department of Public Health is consulted regarding reported cases of lead poisoning and only a few cases of elevated levels of lead in the blood were reported. The Lead Safe Housing Regulation (24 CFR Part 35) has had the greatest negative impact on the Housing Rehabilitation Program of any regulation, because of not having adequate capacity of certified inspectors available in our immediate area. We are still performing emergency rehabilitation projects and projects that are under the minimum levels that do not require complying with the regulation. Our Housing Rehabilitation office staff will continue to attend training on the Lead Safe Housing Regulation when available.

Actions planned to reduce the number of poverty-level families

In an effort to reduce the number of families living in poverty the City of Florence in conjunction with other agencies such as the Florence Housing Authority encourages homeownership, and family self-sufficiency. Through the Handy Hills Citizens for Progress we offer computer training that assists with getting a job or advancing in a current job. To the extent possible the City supports programs of other agencies to upgrade living conditions and economic opportunities within our area.

Actions planned to develop institutional structure

The City has established an administrative personnel hierarchy with a Mayor serving as the chief administrative official. The Planning and Community Development Department consist of the Director who manages all departmental functions including the administration of CDBG activities. Within the department, additional professional and supportive staff members, consisting of Planners and GIS personnel, carry-out the activities of the CDBG program. Additionally, other City departments previously identified (see Managing the Process) work harmoniously with the Department to accomplish the objectives of the CDBG program.

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

The City will continue to attend meetings held at the various private and public services in order to stay current with concerns and issues.

Discussion:

The City of Florence will continue to look for additional funding to help with minimizing the actions highlighted in this section.

Program Specific Requirements

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

Introduction:

According to the CDBG final rule regarding the Annual Action Plan, a jurisdiction must describe activities planned with respect to all CDBG funds expected to be available during the program year (including program income that will have been received before the start of the next program year). CDBG funds that are applicable to the City of Florence grant are program income. Section 108 funds, surplus funds from urban renewal projects and income from float funded activities are not applicable to this plan.

The City estimates that it will use 70% percent of its total anticipated CDBG funding of \$327,756.00 for activities that benefit persons of low and moderate income. 20 percent of the funds will be used for Administration and Planning costs. Additionally, program income generated will be used to benefit lowand moderate-income families as well.

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.

60.00%

Attachments

Citizen Participation Comments

District One Meeting - 10/30/2018

VISION:

Clean City

Needs - Blight Removal, Trash, Wild Animal Control

Good Infrastructure

Needs – better streets (paving, pot holes, etc..., sidewalks, speed bumps/control) College Street Bridge opened backup.

- Safe Streets
- School Shelters

Needs - Bus stop shelters.

- Increased Park & Recreation Activities
- Positive Business Growth

Needs - Get rid of illegal businesses.

- Business Opportunities
- · Jobs for Minority Population
- Transit

Needs - Public transportation services. Currently does not exist.

- Entertainment District
- Resources

Needs –homeless, elderly, youth resources. Funding for Homeless Shelter. Self-Sufficiency programs.

Positive Residential Growth

Needs - Housing built on vacant lots.

Community Investments and Business Revitalization

Needs -

· Private and Public Investments

Needs - Money, access to public and private grants

· Community Policing

Needs - A city and neighborhood partnerships. (neighborhood watch committees)

- Youth Programs
- Needs "planned" athletic and recreational opportunities, mentoring and tutoring, playgrounds, technology. A Safe Place to Grow Up!
- People willing to work on this VISION!

Needs - A PLAN (Goals, Objectives, Support)

District Two Meeting - 10/30/2018

VISION:

Needs:

- Complete River Heritage
- Est. Florence/ Land Are. Center
- Community Gardens Thurgarton England.
- Take care of the homeless
- Mental Health Services
- Housing Geared toward young Families
- · Team. To Retain Talent/ People
- Road Improvements & Main.
- More police to Service communities. More Fireman
- Neighborhood Watch
- Gate ways into City (72 ENT.)
- Homeless services (Panhandlers) /Homeless Shelter to attract away from the downtown area.
- Google Fiber or Fiber Tech
- Identify Growth for UNA Via P.C. /Town/Gown Relationships
- Leadership Groups/ Youth leadership programs
- Celebrate History/ inform the young about Florence's History
- · Infill Housing Development. Improving Sidewalks
- Matching Light buds
- Expansion of Ent. District (Terms)
- Waste Stations for pets
- College St. Bridge
- · Continue Community Spirit in helping/ get the community more proactive and involved
- Work force Development and Recreational Development.
- · Recycling bens in Restaurants inside and outside of them
- Better coordination for higher education
- Unified government in shoal's area
- Business and industry > Technology
- Landscaping > tress replaced and maintained
- Increase public services
- Development for seniors- Housing needs

District Two Meeting - 10/30/2018

VISION:

Asserts

- · Safety / stability
- · Creative places /people
- · Beautiful Communities and neighborhoods
- Recreation
- · culture and arts.
- Zero waste
- Downtown
- Affordability
- Tourism
- · Open Gov.
- Historical Pre
- Community
- · Resources and services
- School / Education systems
- · Influence the young within the community
- Home
- River
- Music / Art
- Weather
- Neighborhoods
- Friendship
- Diversity

District Three Meeting - 11/27/2018

VISION:

- Updated Parks
- · City/ County Debt Free for Economy Growth
- Good Solid Infrastructure
- Younger Skilled Workers
- Career Tech./ Trade
- Youth Activities
- · Road Infrastructure/local/ pot holes
- Special Education
- Existing Infrastructure
- Neighborhood preservation
- Quality Resources
- Citizens Enjoyment
- Encourage Tourism
- Public safety
- Homeless Assistance
- Safety East Florence/ Crime / Drugs
- Music Venue- Indoor/ outdoor
- Growth in west Florence
- Infill Development
- Economic Development
- Skilled Training Programs
- Skilled Jobs
- Blight East Florence
- Neighborhood Watch
- Quality Education System
- Neighborhood Stability
- Veteran Tourism
- Veteran Park
- · Veteran appreciation and events horning past and present veterans
- Lighting in neighborhoods
- Neighborhood Access
- Beautify Florence

District Four Meeting - 11/29/2018

VISION:

- · Culture opportunities and Activities
- Low Crime Safe Areas
- Good Schools and Communities
- Availability of Goods
- Good Education
- River
- Employment opportunities
- Innovative Ideas
- · Parks and Recreation opportunities and Entertainment centers
- · State and Nationwide Recognition
- Partnership between Florence school and UNA
- Crime control with in Neighborhoods
- Recreational facilities
- Value of working together
- Need to utilize Tenseness River Attractions
- Historical values of city / Downtown Area
- Continue Florence Asstainability
- Library
- · Solution to Cleaner water and less Polluted air
- · Religious and spiral life
- Sense of Community in Florence
- New Hospital
- North and East Florence Revit
- River Heritage
- Public Services
- · Environmental Concerns for River
- Music App.
- Infill The Mail
- · Blue Collar Employment Public Transit
- Diversity Government
- Sidewalks and Bike Lanes
- E.C.M. Business Cleanups (Buildings)
- · Parking Downtown and Infrastructure
- Communication
- · Security of Drinking Water Supply
- Shared economy AirBnB- Uber
- Bigger mall/ user for Mall
- SEDA (Sell Community) don't extend contract.
- Need more paying jobs
- · Shared Economy (Housing and Transportations)

- Keep Retail Viable
- · Comp. From Muscle Shoals Stay Out Front
- Restructure SEDA
- · Recruit Business of all Sizes
- Future Generations Maintain
- Homeless Services
- Economic Development Industries Down town through Historical preservation
- · Prepare Workforce and Maintain
- To extend College St. to Hwy. 20
- Develop space for city
- · City WIFI and Sign Ord./ Clean up citywide
- · Infill Downtown Business and Business Retail
- · Economic Development plan to plan for new Hospital and Auto Industry
- · Comp. For public utilities.
- Fiber Internet
- · Recycling Ed.

District 5 12/11/18

Visions

Asserts

- Affordable Housing
- All assets in Conf.
- The Environment, Liter Enforcement / Property on Jackson Rd. for Cypress Creek
- Ark and Culture Programs and Garbage Service going the Extra mile
- Good Clean growth (different Businesses)
- Available services for the size of Florence.
- Ex. Schools is (Education) and Public work services
- · Land use (all Property on Fairground Rd. "Olive property")
- Senior Program and Convenience of Florence (services)
- Cleaner water access and religious and spiritual cultures
- Mc Farland Park geese problem and more quality museums
- Walkability (Develop of Sidewalks) Bike Lanes and value of greenways / landscape in parks
- Improving Bike (Ped. Access)
- · Relations in the city and Music Heritage (shoals Shym.)
- · Safety in community and accessibility to city government and New Hospital
- · Cox Creek and Wildlife and city green scape needs protection
- U.N.A Kilby and Downtown Retail
- · Restaurant Businesses and great school systems all needs
- City Historian knowledge B.R.Warren and Library / City/ UNA Relationship
- Cultural activities and good climate
- Signage/ Wayfinding
- Sense of place Historical knowledge Town growth
- River Heritage Completion and Music Heritage (Explore it more)
- · Active service clubs and Indian Mound Museum
- School Mem, Room Bradshaw and Coffee
- UNA Pool

Needs

- · Coffee/ Bradshaw/ Burrell assets under city system and more signage
- · Retirement Comm. And focus on public Trans. (Needs)
- Public works services and safety on city streets and Intersections (needs)
- · Maintain Curbing (Needs) and transportation needs and Homeless care
- Strengthening neighborhood coronets
- · Sight Dist. Problems and incentivize green designated businesses
- Cox Creek Parkway. Mall Area safety with Sidewalks on crossways
- Road Infrastructure Improvement (Resurfacing)
- Cub Maintenance public Row's

- · Improve Walkways in streets (Jackson Rd.) and Reduce Funding to spend on other places
- Improve Signage / Wayfinding
- · Continue Comprehensive plan for Retirement aged
- · Coordinated Infrastructure Improvement
- · Indoor Swimming- we are losing our pools Natatorium
- Sports Facilities for youth programs (Florence + UNA Terms)
- · Code Enforcement and sign enforcement and Zoning Enforcement
- · Limit. Eff. Electricity Light pollution at parks when not being used
- Noise pollution Enforcement city ordnance
- · Res. Street Parking and Eco. Tourism / Reinvest for Infill Development.
- Development Form Based Codes
- ARC. Controls for Dev.
- Urban Landscaping Cox Creek PKWY.
- Better Recycling Facilities Glass
- Environment other Trans. Means
- Control + Enforce Blight Prop.
- Utilize The Tennessee River for Tourism
- Repair + Clean Fences in city

District Six 12/13/18

Visions

- · New Hospital and Downtown Atmosphere
- Good Education and Affordable housing
- New Indian Museum and Parks + Green Space
- Wildwood Park
- UNA- Higher Education Employee Retirement
- · Climate and lifestyle Slow paced
- · Arts- Recreation and Location to Larger Cities
- Historic Sites + Culture and Library
- Down town Florence
- All
- Art Venues

District Six 12/13/18

Needs

- · Traffic Plans + Enforcement and Services for Industrial
- England Property on 72 (clean) and better coordination with city depts.
- . More resources in all Districts and better utilize the Tennessee River water front
- · Complete river Heritage and better wayfinding (Incomplete)
- Improve Darby/ Florence BLVD. Intersection.
- · Urban Green Space- Mc Farland + Veterans Park
- Intermediate Jos and new or more Industry (clean Industry) 2nd, 3rd Tier
- Public Trans. And Access to Florence/ Fiber Internet
- · Higher pay for first responders and infill for Mall/ Retime Traffic Lights

SECTION 1: COMMUNITY DEVELOPMENT BLOCK GRANT

Introduction:

The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended 42 U.S.C.-530.1 et seq.

The Community Development Block Grant (CDBG) Entitlement Program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-5301 et seq.

CDBG National Objectives: 24 CFR Part 570

- At least 70% of the program participants must have low or moderate income as defined by HUD.
- The project must eliminate slum and blight as defined by HUD.
- Meet an urgent need designated as an emergency by the City of Florence.

The following is a list of the most common eligible activities:

CDBG Eligible Activities: 24 CFR PART 570.20 (a)-(e)

- Acquisition of real property for any public purposes other than the general conduct of government.
- Disposition of property acquired with Community Development Block Grants funds.
- Acquisition, construction, rehabilitation, or installation of public facilities and improvements carried out by the City or other public or private nonprofit entities. Generally, this does not apply to new construction.
- Public services (limited to 15% of the City's total CDBG entitlement) which are directed toward improving the community's public services and facilities, including, but not limited to, those concerned with employment, welfare reform, child care, health, drug abuse, education, job training assistance, recreational needs, crime prevention, or energy conservation.
- Removal of architectural barriers, which restrict the mobility of elderly and/or persons with disabilities. All publicly and privately owned buildings and facilities are eligible for funding.
- Rehabilitation and preservation for:
 - Low and moderate-income owner-occupied houses.

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- Low and moderate-income public housing.
- Publicly owned nonresidential buildings and improvements otherwise eligible for assistance.
- Publicly or privately owned historic properties.
- · Commercial or industrial facility for job creation or retention
- Public Facilities
- Affordable housing or mixed income housing
- Low and moderate-income senior housing
- Businesses that agree to hire, retain and/or serve low and moderate-income persons.
- Activities designed to create or retain jobs. All jobs created within the applicant's program are required to be permanent and at least 51 percent of the total must be for persons of low and moderate income.

Income Restrictions:

At least 51% of the program's participants must be low and moderate income as determined by HUD (HOME) income limits for THE City of Florence. To determine if a client qualifies as low or moderate income, household size must be determined first, followed by the total income of the households. If the total household income falls below the 80% of median income, the client can be counted towards the 51% required participation of low and moderate income residents.

CDBG Ineligible Activities: 24 CFR Part 570,207

The following activities may not be assisted with CDBG funds:

- Buildings for the general conduct of government. This includes operating and maintenance expenses. Exceptions are operation and maintenance associated with public service activities, interim assistance, and CDBG program staff.
- General government expenses except to carry out the CDBG program.
- Political or religious activities.
- Construction equipment.
- Fire protection equipment unless part of a public facility.
- Personal furnishing or property.
- Food not related to direct service delivery to clients.
- Furnishings that are not integral structural fixtures.
- New housing construction except for land acquisition and other specific circumstances.
- Income payments and other subsistence payments made to individuals or a family.

Low and Moderate Income Benefit Requirement At least 70% of the City of Florence's non-administration CDBG spending is required to benefit low and moderate income people. The 70% threshold should not be exceeded each year to maintain compliance. However, HUD rules allow grantees to use spending during a fixed three-year period to calculate.

SECTION 2: CITY OF FLORENCE CDBG PROGRAM

City of Florence CDBG Program Overview:

The City of Florence, Alabama receives a yearly CDBG (Community Development Block Grant) entitlement from the US Department of Housing and Urban Development (HUD). To continue participation in this program, the City contractually agrees with HUD to implement the Housing and Community Development Act of 1974 and related CDBG program regulations. All CDBG assisted activities must be eligible as specifically defined in the regulations and meet one of the three following National Objectives:

- At least 70% of the program participants must have low or moderate income as defined by HUD.
- The project must eliminate slum and blight as defined by HUD.
- Meet un urgent need designated as an emergency by the City of Florence.

The City of Florence is a small entitlement. Therefore, funds are limited to specific projects that are deemed priorities for our community. Each year CDBG funds are designated for Public services, Residential Rehabilitation, Spot Blight Removal, Public Facilities, and administration of the grant.

Public Services Designation: 24 CFR Part 570.201 (e)

CDBG funds may be used on a range of public services including (but not limited to):

- Child care
- Health Care
- Job training
- Education programs.
- Public Safety Services
- · Homcownership Assistance
- Fair Housing Counseling
- Transportation
- Drug abuse; and
- Services for elderly

Eligible costs for existing public services must be either:

- A new service; and
- A quantifiable increase in an existing service

The City of Florence funds Public Service entities each year. A Notice of Funding Availability (NOFA) is advertised to allow non-profit entities to apply for CDBG funds. Advertisement is placed on the City's website and announced through social media for funds available. In order for public service entities to qualify for a grant; they must meet one of the three national objectives designated by HUD. Once application deadline has expired; awards are determined based on

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national objectives, services provided, and amount. Applicants are notified of decisions and if awarded; a sub-recipient contract is placed on the City Council agenda.

*Note - On September 30, 2003, HUD issued a Final Rule implementing EO 13279, requiring equal opportunity to Faith Based Organizations (FBO). On September 29, 2004, HUD provided further guidelines to program administrators ensuring equal treatment of FBOs participating in the CDBG program.

CDBG Spending Restrictions for Public Services:

Public Service Cap No more than 15% of the sum of the annual entitlement grant plus any grant program income received in the previous grant year on public service programs. The public service cap is calculated by:

Current year entitlement amount:	+ Previous y	ear program	income	received:
— Amount to calculate public ser	rvice cap:	X	0.15 x 0	.15 Total
maximum amount for public service programs:				

Residential Rehabilitation: 24 CFR Part 570,202

Residential Rehabilitation of owner occupied housing is an eligible expense with CDBG funds. The City of Florence allocates funds each year to the Residential Rehab Project line item. Applications are received to check for income eligibility, based on the Fiscal Year HOME income limits, and scope of work eligibility. All Residential Rehabilitation Projects Must be in compliance with the following HUD Regulations.

24 CFR Part 58 - Environmental Review process

Each project will be assessed for environmental impact. If the project is deemed categorically excluded subject to 58.35, the file will be documented as such. However, if the project is subject to section 58.5, all necessary documentation will be completed in compliance with these regulations.

24 CFR Part 35 - Lead Based Paint

All lead-based paint activities, including waste disposal, performed under this part shall be performed in accordance with applicable Federal laws and authorities. For example, such activities are subject to the applicable environmental review requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.), the Toxic Substances Control Act, Title IV (15 U.S.C. 2860 et seq.), and other environmental laws and authorities (see, e.g., laws and authorities listed in §50.4 of this title).

24 CFR Parts 85.36 - Procurement and Debarment

Further information on the Residential Rehab Program can be found in the: City of Florence Residential Rehab Policies and Procedure manual. (Attachment A)

Spot Blight Removal: 24 CFR Part 570.201(d)

In the effort to remove slum and blight from the City of Florence; CDBG funds are designated each year for the removal of dilapidated property in accordance with HUD regulations. This

project is done on a community wide spot basis. Properties are identified and placed in the Annual Action Plan each year as site specific locations.

Public Facilities and Improvements: 24 CFR Part 570.201(c)

CDBG funds may be used by the grantee to develop, improve, or install a public facility. HUD defines public facilities and public improvements as all improvements and facilities that are either publicly owned or traditionally provided by the government, or owned by a non-profit and operated to serve the general public. Example include but are not limited to:

- Sewer and water facilities
- Senior citizen centers
- Recreation centers
- Day care centers
- Fire stations.
- Streets and sidewalks
- Parks and playgrounds
- Aesthetic amenities on public land such as landscaping and fountains,

Each year the Department of Planning and Community Development works with other City departments to identify any public improvement needs in our Low/Mod income areas (LMA's) within the City. If any are identified, they are placed in the Consolidated Plan and Action Plan for future funding. Due to the small amount of CDBG funds received each year, we have focused more on Public Facility's needs.

<u>Program Administration and Planning Activities</u>: 24 CFR Part 570,205 and 570,206

The success of the City of Florence CDBG Program depends upon careful management and administration involving planning and scheduling, knowledge and responsibility of a variety of management functions, and effective oversight of program activities. HUD CDBG policies and regulations are proper, sound business practices for the completion of any public project. The knowledge and understanding of these policies and regulations will allow for a process that will work hand in hand with achieving the desired project goals.

Administration of the CDBG program is an eligible expense. Examples of expenses are:

- Providing information to officials and the public
- Budget and scheduling preparation
- Development of written agreements
- Monitoring program progress and compliance
- Reporting
- General management
- Official travel
- Legal, audit, and accounting services
- Fair housing Activities
- Preparation of application for federal funds
- Office supplies and equipment Office supplies and equipment purchases are eligible expenses under the Grant Recipient and Sub-Recipients agreement if used for

administration of the program, transportation for public services, and/or Fire Protection and Safety.

Further information can be found on equipment purchases in the City of Florence Equipment and Supplies Policies and Procedures Manual (Attachment B)

Eligible Planning Activities include:

- Development of Comprehensive Plan
- Economic Planning
- Transportation Planning
- Historic Preservation studies
- Small Area and Neighborhood Plans
- Analysis of Impediments to Fair Housing; and
- Individual project plans.

The City allocates admin funds each program year in order to cover the costs of implementing, monitoring, and reporting the progress of each Project/Activity stated in the Annual Action Plan.

Further information on Program Administration can be found in the: City of Florence Program Administration and Management Policies and Procedures manual (Attachment C)

CDBG Spending Restrictions for Program Administration and Planning:

Planning and Administration Cap No more than 20% of the sum of the annual entitlement grant plus any grant program income received in the during the grant year may be spent on planning studies or administration. The planning and administration cap is calculated by:

Current year entitlement amount:	+ Current year pr	rogram income expected:
== Amount to calculate add		x0.2= x0.2=
Total maximum amount for administration:		

Program Income: 570.500(a) AND 570.504

Program Income is defined as the gross income received by the grantee or subreceipient directly generated from the use of CDBG funds. Program income does not include any income received by the grantee and all its subrecipients in a single program year if the total does not exceed \$25,000.

Further information on Program Administration can be found in the: City of Florence Program Administration and Management Policies and Procedures manual (Attachment D)

CDBG Timeliness Test:

HUD requires the City of Florence to use the CDBG funds it receives in a timely manner. HUD determines if entitlements are spending down its CDBG entitlement in a timely manner by checking to see what the unspent balance is on July 3 of each year. HUD requires the amount of unspent funds to be no more than 150% of the entitlement amount for the current year.

SECTION 3: PLANNING AND COMPLIANCE

CDBG Consolidated Plan, Annual Action Plan, and CAPER: 24 CFR Part 91.200-230

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs. The Consolidated Plan is carried out through Annual Action Plans, which provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

The City of Florence runs on a 5-year Consolidated Plan. The plan identifies High, Medium, and Low priority projects that will be designated throughout those years in the Annual Action Plans. Public meetings are held for the Consolidated and Annual Action Plans. The public meetings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents will be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate, where practical. These meetings will be held in the Low/Mod income eligible districts. Advertisement for these Citizen Participation Meetings are placed in the Courier Journal, (a free newspaper that is delivered on Tuesday's to every mailing address in the City & Lauderdale County); the department webpage; and social media.

Prior to adoption of a Five Year Consolidated Plan and/or Annual Action Plan, the City will make available to interested citizens, agencies, groups and other interested parties the following:

- Information that includes the amount of grant funds and program income it expects to receive.
- The range of activities that may be undertaken.
- The estimated amount that will benefit persons of low and moderate income.
- Publication of the proposed Consolidated Plan in a manner that affords all citizens a reasonable opportunity to examine its contents and submit comments.
- Publish the proposed Consolidated Plan or its Summary on the City of Florence Department of Planning and Community Development webpage. The Summary will describe the contents and purpose of the proposed Consolidated Plan and include a list of locations where copies of the entire proposed Consolidated Plan may be examined.
- The City will provide free copies of the proposed Consolidated Plan to citizens and groups that request it.
- Provide a thirty (30) period for review and to receive comments from interested citizens, agencies and/or groups on the proposed Consolidated Plan.
- The City shall consider any comments or views of interested citizens, agencies and/or groups received in writing and/or orally at the public meeting, in preparation of the final

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Consolidated Plan. A summary of comments and views received and a summary of comments and views not accepted and the reasons therefore, shall be attached to the final Consolidated Plan. Provide a copy of the proposed Consolidate Plan and summary on the department webpage.

Program Amendments:

In order to properly notify public stakeholders and to continue to be good stewards of public dollars, the City of Florence will properly advertise amendments on the City's website all amendments to the Consolidated Plan and Annual Action Plan designated as: new projects, new activities, substantial change in a scope of work, and any other amendments deemed necessary under Federal Regulations. Our current Citizen Participation Plan states:

The City of Florence will amend its Final statement whenever it decides not to carry out an activity described in the Final Statement, or decides to carry out an activity not previously described, or decides to substantially change the purpose, scope, location, beneficiaries, or budgeted dollar amount of an activity. Any new project or transaction to existing activities over \$150,000.00 or as noted above changes in the purpose, scope, location and beneficiaries, will constitute a substantial change or amendment for purposes of requiring a written amendment.

Prior to amending its Final Statement, the City will provide citizens with reasonable notice of, and an opportunity to comment on such proposed amendments, by publication in the Courier Journal at least 30 days prior to amendment by the City. The City will make available to the public, and will submit to III/D, a description of amendments adopted.

It is the responsibility of the City of Florence to ensure all public stakeholders have an opportunity to participate in the planning of CDBG funds.

Further information on the amendment process can be found in the: City of Florence Citizen Participation Plan (Attachment E)

Environmental Review Record: 24 CFR Part 58

The Office of Environment and Energy (OEE) manages the environmental review process for HUD. An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws.

Further information on the process to ensure compliance can be found in the: City of Florence Environmental Policies and Procedures Manual (Attachment F)

Lead Based Paint: 24 CFR Part 35

The City of Florence CDBG Program is required to comply with HUD Lead Safe Housing Regulations. The purpose of the regulation is to ensure that housing receiving federal assistance

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does not pose lead-based point hazards to young children and other at-risk populations. State laws may be more stringent than HUD's regulations; therefore, the City of Florence will comply with the rule that offers the occupants the most protection.

In order to ensure compliance with these regulations, the City of Florence housing rehabilitation inspector will continue to attend LBP training when available. Due to limited funds available for projects that are affected by LBP; the City of Florence has modified its residential rehab program to only offer grants for projects that will not disturb paint and/or the home was built after 1978; or any of the following exceptions apply based on HJD's regulations.

- Emergency work that is done to save the occupants or properly from imminent danger;
- Human threat is unlikely—example: unoccupied units is to be demolished or the rehab will not disturb paint;
- Child occupancy is unlikely example; zero bedroom units, elderly-only or special, singles housing.

Procurement: 24 CFR Part 85.36

All CDBG funded Projects Must be in compliance with the following HUD Regulations.

In all procurement actions the City of Florence will insure that the highest standards of integrity and impartiality are observed. Specific ethical requirements are the following:

- Conflict of Interest
- Gifts, Kickbacks and Use of Confidential Information
- Anti-competitive Practices
- Follow the leader Pricing
- Sharing of the Business
- Controlling the resale price of the products; and
- Improper collective refusal to bid

The City of Florence and its sub-recipients, will use their own procurement procedures which reflect applicable State and local laws and regulations, provided that they conform to applicable Federal law and standards identified by HUD.

Due to recent updates to the Project Procurement Policy and Procedures, as regulated by HUD, the procedures have updated for the 2015 CDBG program year effective May 1, 2015.

- Follow a free and open competitive process in securing those products or services.
- Properly document purchasing activities and decisions.
- Observe the special rules for particular kinds of purchases (small purchases, Micro-Purchase, competitive scaled bids, competitive proposals, and sole source procurements).
- Properly bond and insure work involving large construction contracts and/or subcontracts.

Procurement Notes

Micro is any purchase or service that does not exceed \$3,000 does not have to be procured.

- A sole source item provider determination will be submitted to the HUD Field Office for approval before purchase.
- Contracts for Residential Rehab projects are held between the property owner and the
 contractor. The City asks that the owner obtain at least three quotes; research is done for
 licensing and debarment; approval is submitted to the contractor.

A good procurement policy can be summarized as follows:

- Seek competitive offers to obtain the best possible quality at the best possible price;
- Use a written agreement that clearly states the responsibilities of each party;
- Keep good, clear records; and,
- Have a quality assurance system that helps the grantee or sub recipient get what it pays for.

Further information regarding the procurement process can be found in the: City of Florence Procurement Policies and Procedures Manual (Attachment G)

Davis Bacon Wage Determination: 24 CFR Part 35

Construction work that is linanced in whole or in part with CDBG funds must adhere to certain Federal Labor Standards. Labor standards requirements include the Davis Bacon Act, the Copeland Anti-Kickback Act, and Contract Work Hours and Safety Standards Act. The combination of these acts refer to the "Davis-Bacon and Related Acts".

The Davis-Bacon Act of 1931 is a United States federal law which established the requirement for paying prevailing wages on public works projects. All federal government construction contracts, and most contracts for federally assisted construction over \$2,000, must include provisions for paying workers on-site no less than the locally prevailing wages and benefits paid on similar projects.

The City of Florence requires that any job related to construction over \$2,000 submit certified payroll with all invoices. Contractors are given the wage rate sheets at the time the contract is signed. Davis-Bacon Wage Rate signs are posted at construction site; and interviews are conducted by the CDBG program inspector to insure that employees are being compensated according to wage-determination rates of pay.

Some exceptions do apply to these federal labor standards. The following do not have to follow Davis-Bacon Wage Determination:

- Contracts where the scope of work is solely for the removal of debris and related clean up unless the debris removal is performed in conjunction with other repair or reconstruction work.
- Bona-fide self-employment contractors
- Owners, supervisors and managers of the construction company; and
- Utilities work (performed by the utility company)

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SECTION 3: 24 CFR Part 135

Section 3 of the Housing and Urban Development Act of 1968 concerns economic opportunity for LMI residents of the community. Section 3 Residents are individuals that reside in Public and Indian housing; and/or individuals that reside in the entitlement area that receive section 3 covered assistance. Section 3 Businesses are those that are 51% or more owned by section 3 residents; or businesses whose permanent, full-time employees include at least 30% section 3 residents; or businesses that provide evidence of a commitment to subcontract in excess of 25% of the dollar amount of all subcontracts to be awarded to businesses that meet the qualifications above.

Fair Housing and Equal Opportunity: 24 CFR Part 1

The mission of the Office of Fair Housing and Equal Opportunity (FHEO) is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of federal fair housing policies and laws. FHEO protects people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status.

In order to be in compliance with all federal regulations pertaining to Fair Housing Planning, the City of Florence is required to certify that we are Affirmatively Furthering Fair Housing. This process is done through assessments to determine Analysis of Impediments to Fair Housing. The City prepares an updated Fair Housing Plan at the beginning of each Consolidated Plan. Any impediments that are identified throughout the planning process will be placed in the Consolidated Plan along with a timeline to alleviate the issue.

City of Florence Fair Housing Plan (Attachment I)

SECTION 4: MANAGING THE PROCESS:

The City of Florence Planning and Community Development Department is the lead agency responsible for administering the programs covered by the consolidated plan. The dedicated staff consisting of highly knowledgeable professionals and support personnel works cohesively to carry out the mission of the program. Additionally, the Department utilizes the professional knowledge, skills, and abilities of other City departments such as: Engineering, Building/Permits, Accounting, Public Works, Parks and Recreation. The City is fortunate to have a full-time City Attorney on staff as well.

Institutional Structure:

The City has established an administrative personnel hierarchy with a Mayor serving as the chief administrative official. The Planning and Community Development Department consist of the Director who manages all departmental functions including the administration of CDBG activities. Within the department, additional professional and supportive staff members, consisting of Planners and GIS personnel, carry-out the activities of the CDBG program. Additionally, other City departments previously identified (see Managing the Process) work harmoniously with the Department to accomplish the objectives of the CDBG program.

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Management and Administration:

The City of Florence CDBG Program is administered by the management and staff of the Planning and Community Development Department and the General Fund Accounting Department. Current staff includes the Director of Planning and Community Development, Finance Director, Community Development Coordinator, Land Development Planner II, Development Technician, and Project Inspector.

Grant funds for program administration are paid to the City of Florence General Fund and dispersed through the regular employee payroll method. All hours worked on the CDBG program are documented with time sheets for each employee involved and payment to the General Fund coincides with the time sheets. Additionally, certifications for all employees working on the program 100% of their time are completed semi-annually.

Further information regarding the Managing and Administering the grant can be found in the: City of Florence Program Management and Administration Policies and Procedures (Attachment C)

Recordkeeping:

An adequate recordkeeping and filing system is essential to document both fulfillment of applicable regulations and accomplishment of program activities. Complete records are necessary for the two major aspects of CDBG audit, financial soundness and program compliance. Without adequate records to support programmatic decisions, even the best performed program will receive an adverse audit. All files and records will be kept in the Department of Planning and Community Development for a period of three years as required by HUD.

The importance of maintaining a logical and complete filing system cannot be overemphasized. The key consideration in the City of Florence CDBG filing system is that it creates a clear "audit trail." This means that every transaction can be traced from beginning to end. For example, a simple purchase of goods might begin with a purchase requisition followed by a purchase order that is matched with a receiving report when the goods arrive. These documents are then matched with a vendor's invoice and a check is processed. After appropriate accounting entries are made and the cancelled check is returned, the entire transaction may be filed. Thus, the purchase may be traced from beginning to end by source documentation.

Monitoring: 24 CFR Part 570,501

The most important functions undertaken by the City of Florence CDBG Program is self-monitoring and oversight. The four primary components of CDBG monitoring are progress on planned activities, program compliance, liscal management and fiscal compliance to:

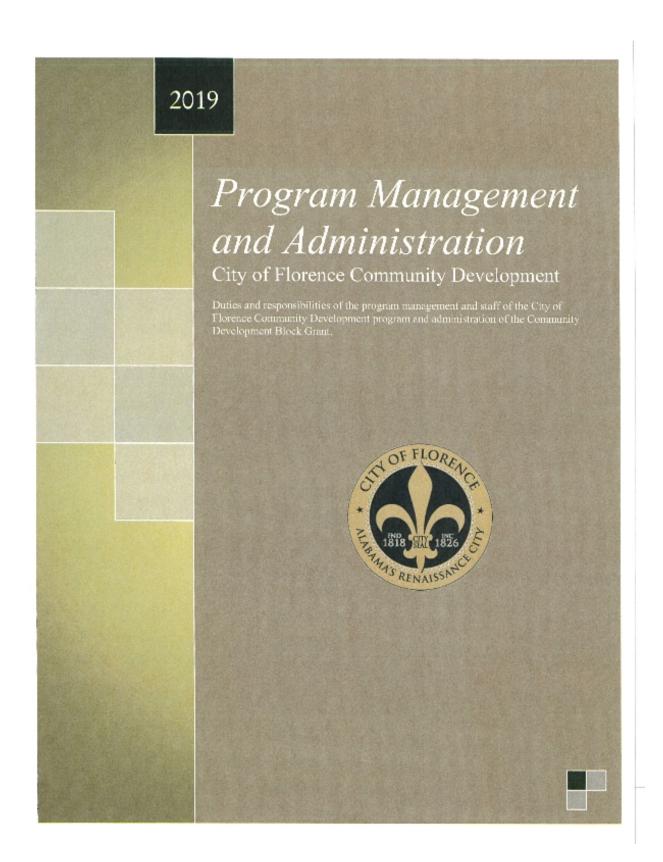
- Manage their community development program as a whole, and individual projects and activities substantially, as described in the approved CDBG application;
- Maintain program or project progress;
- Determine that costs charged to the project are eligible;
- Ensure that all program activities comply with all applicable laws and regulations and terms
 of the grant agreement; and
- Eliminate the opportunity for fraud, waste, and mismanagement.

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- Offer Technical Assistance to all sub-recipients of the CDBG grant to insure continued compliance with federal regulations; and
- Monitor all sub-recipients of the CDBG grant to insure compliance with federal regulations.

Further information regarding Monitoring can be found in the: City of Florence Sub-Recipient Monitoring Policies and Procedures (Attachment II)

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Community Development Block Grant | Program Management and Administration

The success of the City of Florence Community Development Block Grant Program depends upon eareful management and administration involving planning and scheduling, knowledge and responsibility of a variety of management functions, and effective oversight of program activities. HUD CDBG policies and regulations are proper, sound business practices for the completion of any public project. The knowledge and understanding of these policies and regulations will allow for a process that will work hand in hand with achieving the desired project goals.

Responsibilities of administering the City's CDBG program are discussed in greater detail on the following pages.

The City of Florence CDBG Program is administered by the management and staff of the Planning and Community Development Department and the General Fund Accounting Department. Current staff includes the Director of Planning and Community Development. Finance Director, Assistant Director of Planning, Community Development Coordinator, Land Development Planner II, and Development Technician.

Grant funds for program administration are paid to the City of Florence General Fund and dispersed through the regular employee payroll method. All hours worked on the CDBG program are documented with time sheets for each employee involved and payment to the General Fund coincides with the time sheets. Additionally, certifications for all employees working on the program 100% of their time are completed semi-annually.

A. Staff Responsibilities

- Responsibilities of the Director of Planning and Community Development Shall have overall program responsibility. Specifically, this individual shall have the following responsibilities:
 - Manage overall CDBG program
 - Manage staff working within the CDBG program.
 - Recommend approval of third-party contracts to the City Council.
 - · Recommend approval for purchase orders to City Administration
 - Recommend and/or approve invoices/contractor payment to the Finance Officer
 - Monitor staff field review of project activities
 - Monitor staff review project progress
 - Approve CDBG budget/project amendments
 - Monitor third-party contracts
 - Monitor submittal of final close-out report(s)
 - · Assist annual audit requirements

Reviewed & Revised 9/26/2019

II. Responsibilities of the Finance Officer

In managing CDBG financial resources, there must be an appropriate division of responsibility regarding the request and receipt of CDBG monies. Proper internal control should be exercised to guard against opportunities for waste, fraud, and mismanagement. Specifically, this individual shall have the following responsibilities:

- Maintenance and control of accounting documents approved for processing by the Director of Planning and Community Development
- Preparation of financial reports used by the program staff based on accounting records
- Entry of these and other accounting transactions into the general fund accounting system
- · Provide for an annual audit
- Assist in submittal of financial reports
- Receive, process, and pay invoices submitted by the program and approved by the Director.

III. Responsibilities of the Community Development Coordinator

Shall directly assist in the overall program responsibility. Specifically, this individual shall have the following responsibilities:

- Work directly with the Director, HUD representatives, Finance
 Officer, and program staff to carry out the elements of the program.
- Prepare budget and project amendments
- Report issues to the Director
- Oversee recipient and contractor compliance with statutory/program requirements
- Recommend approval of third-party contracts to the Director.
- · Oversee field review by Project Inspector of project activities
- Oversee project progress
- Maintain project files
- · Oversee progress of third-party contracts
- · Submittal of final close-out report(s)
- Assist annual audit requirements
- Creation/review of the Action Plan for accuracy and compliance with the regulations under part 91, including but not limited to 24 CFR § 91.220(j)(iv)
- · Assists with all duties of the Director and other staff
- · Completes and submits financial status reports
- · Reports to the Director on financial status of the program.

Reviewed & Revised 9/26/2019

Community Development Block Grant | Program Management and Administration

IV. Responsibilities of the Land Development Planner II

- Receives and processes invoices for payment
- Posts program income payments and submits deposits to the City Clerk's office.
- · Assist annual audit requirements
- · Recommend approval for purchase orders to the Director
- Recommend and/or approve invoices/contractor payment to the Director

V. Responsibilities of the Assistant Director of Planning

- · Provides mapping and statistical support to the program staff
- Assists with all duties of the Director

VI. Responsibilities of the Development Technician

- Carries out the Environmental Review Process according to the requirements of HUD and submission of each project in HERO's
- Assists with all duties of the Director, Coordinator, and Project Inspector
- Inspects all projects before, during, and after construction.
- Reports issues to the Director and Coordinator
- Assists with all duties of the Director, Coordinator, and Residential Rehabilitation Coordinator

B. Recordkeeping

An adequate recordkeeping and filing system is essential to document both fulfillment of applicable regulations and accomplishment of program activities. Complete records are necessary for the two major aspects of CDBG audit, financial soundness and program compliance. Without adequate records to support programmatic decisions, even the best performed program will receive an adverse audit. All files and records will be kept in the Department of Planning and Community Development for a period of five years.

The importance of maintaining a logical and complete filing system cannot be overemphasized. The key consideration in the City of Florence CDBG filing system is that it creates a clear "audit trail." This means that every transaction can be traced from beginning to end. For example, a simple purchase of goods might begin with a purchase requisition followed by a purchase order that is matched with a receiving report when the goods arrive. These documents are then matched with a vendor's invoice and a check is processed. After appropriate accounting entries are made and the cancelled check is returned, the entire transaction may be filed. Thus, the purchase may be traced from beginning to end by source documentation.

Summary

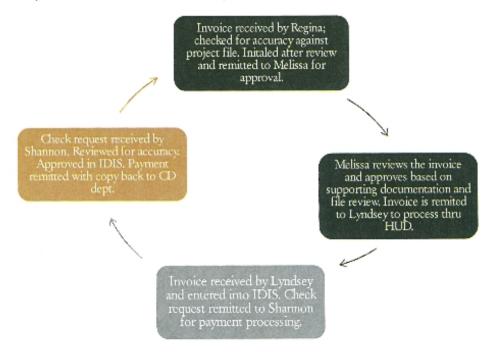
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Community Development Block Grant | Program Management and Administration

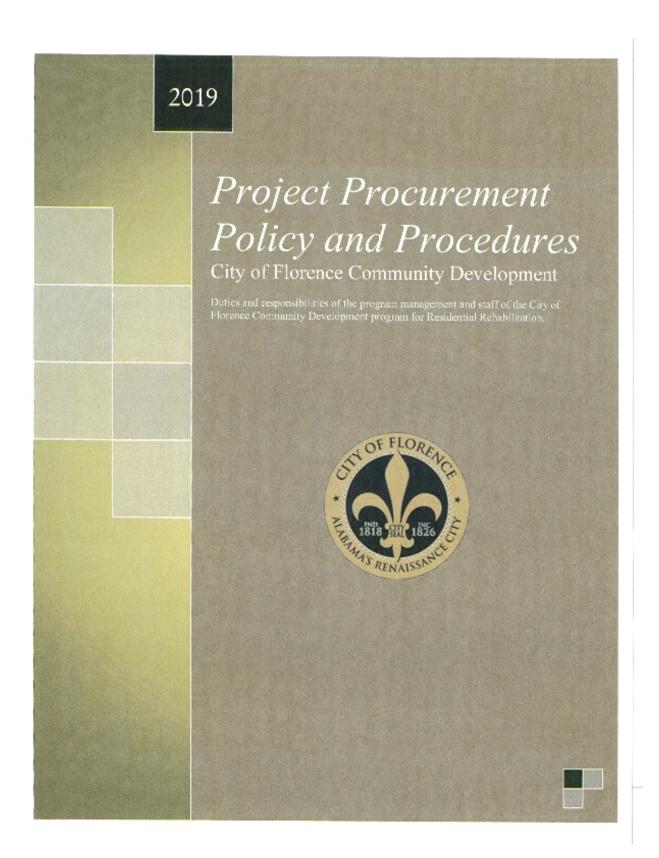
The most important functions undertaken by the City of Florence CDBG Program is selfmonitoring and oversight. The four primary components of CDBG monitoring are progress on planned activities, program compliance, fiscal management and fiscal compliance to:

- Manage their community development program as a whole, and individual projects and activities substantially, as described in the approved CDBG application;
- Maintain program or project progress;
- · Determine that costs charged to the project are eligible;
- Ensure that all program activities comply with all applicable laws and regulations and terms of the grant agreement; and
- Eliminate the opportunity for fraud, waste, and mismanagement.

Chain of Command/Review Financial Data Input to IDIS



Reviewed & Revised 9/26/2019



All CDBG funded Projects Must be in compliance with the following HUD Regulations,

24 CFR Parts 85.36 - Procurement and Debarment

(b) Procurement standards.

- Grantees and subgrantees will use their own procurement procedures which reflect
 applicable State and local laws and regulations, provided that the procurements conform
 to applicable Federal law and the standards identified in this section.
- Grantees and subgrantees will maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- 3. Grantees and subgrantees will maintain a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts. No employee, officer or agent of the grantee or subgrantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:
 - The employee, officer or agent,
 - ii. Any member of his immediate family,
 - iii. His or her partner, or
 - An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award.

The grantee's or subgrantee's officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subagreements. Grantee and subgrantees may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value. To the extent permitted by State or local law or regulations, such standards or conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the grantee's and subgrantee's officers, employees, or agents, or by contractors or their agents. The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest.

4. Grantee and subgrantee procedures will provide for a review of proposed procurements to avoid purchase of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

- To foster greater economy and efficiency, grantees and subgrantees are encouraged to enter into State and local intergovernmental agreements for procurement or use of common goods and services.
- Grantees and subgrantees are encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
- 7. Grantees and subgrantees are encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.
- Grantoes and subgrantees will make awards only to responsible contractors possessing
 the ability to perform successfully under the terms and conditions of a proposed
 procurement. Consideration will be given to such matters as contractor integrity,
 compliance with public policy, record of past performance, and financial and technical
 resources.
- Grantees and subgrantees will maintain records sufficient to detail the significant history
 of procurement. These records will include, but are not necessarily limited to the
 following: rationale for the method of procurement, selection of contract type, contractor
 selection or rejection, and the basis for the contract price.
- 10. Grantees and subgrantees will use time and material type contracts only
 - i. After a determination that no other contract is suitable, and
 - If the contract includes a ceiling price that the contractor exceeds at its own risk.
- 11. Grantees and subgrantees alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to source evaluation, protests, disputes, and claims. These standards do not relieve the grantee or subgrantee of any contractual responsibilities under its contracts. Federal agencies will not substitute their judgment for that of the grantee or subgrantee unless the matter is primarily a Federal concern. Violations of law will be referred to the local, State, or Federal authority having proper jurisdiction.
- 12. Grantees and subgrantees will have protest procedures to handle and resolve disputes relating to their procurements and shall in all instances disclose information regarding the protest to the awarding agency. A protestor must exhaust all administrative remedies with the grantee and subgrantee before pursuing a protest with the Federal agency. Reviews of protests by the Federal agency will be limited to:

- Violations of Federal law or regulations and the standards of this section (violations of State or local law will be under the jurisdiction of State or local authorities) and
- ii. Violations of the grantee's or subgrantee's protest procedures for failure to review a complaint or protest. Protests received by the Federal agency other than those specified above will be referred to the grantee or subgrantee.

(c) Competition.

- All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of Sec. 85.36. Some of the situations considered to be restrictive of competition include but are not limited to;
 - Placing unreasonable requirements on firms in order for them to qualify to do business,
 - Requiring unnecessary experience and excessive bonding.
 - iii. Noncompetitive pricing practices between firms or between affiliated companies,
 - iv. Noncompetitive awards to consultants that are on relainer contracts,
 - V. Organizational conflicts of interest.
 - Specifying only a brand name product instead of allowing an equal product to be offered and describing the performance of other relevant requirements of the procurement, and
 - Any arbitrary action in the procurement process.
- 2. Grantees and subgrantees will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts State licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criteria provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.
- Grantees will have written selection procedures for procurement transactions. These
 procedures will ensure that all solicitations;

- i. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be produced. Such description shall not, in competitive producements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be produced, and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or unecommical to make a clear and accurate description of the technical requirements, a brand name or equal description may be used as a means to define the performance or other salient requirements of producement. The specific features of the named brand which must be met by offers shall be clearly stated; and
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- 4. Grantees and subgrantees will ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, grantees and subgrantees will not preclude potential bidders from qualifying during the solicitation period.

(d) Methods of procurement to be followed.

- Procurement by small purchase procedures. Small purchase procedures are those
 relatively simple and informal procurement methods for securing services, supplies, or
 other property that do not cost more than the simplified acquisition threshold fixed at 41
 U.S.C. 403(11) (currently set at \$100,000). If small purchase procedures are used, price
 or rate quotations shall be obtained from an adequate number of qualified sources.
- 2. Procurement by scaled bids (formal advertising). Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in Sec. 85.36(d)(2)(i) apply.
 - In order for scaled bidding to be feasible, the following conditions should be present:
 - A. A complete, adequate, and realistic specification or purchase description is available;

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- B. Two or more responsible bidders are willing and able to compete effectively and for the business; and
- C. The procurement lends itself to a firm lixed price contract and the selection of the successful bidder can be made principally on the basis of price.
- If scaled bids are used, the following requirements apply:
 - A. The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;
 - The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;
 - All bids will be publicly opened at the time and place prescribed in the invitation for bids;
 - D. A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
 - Any or all bids may be rejected if there is a sound documented reason.
- 3. Procurement by competitive proposals. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixedprice or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:
 - Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;
 - Proposals will be solicited from an adequate number of qualified sources;

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- Grantees and subgrantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;
- Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
- v. Grantees and subgrantees may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.
- Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or offer solicitation of a number of sources, competition is determined inadequate.
 - Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies:
 - A. The item is available only from a single source:
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - The awarding agency authorizes noncompetitive proposals; or
 - After solicitation of a number of sources, competition is determined inadequate.
 - Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required.
 - Grantees and subgrantees may be required to submit the proposed procurement to the awarding agency for pre- award review in accordance with paragraph (g) of this section.

Internal Office Procedures:

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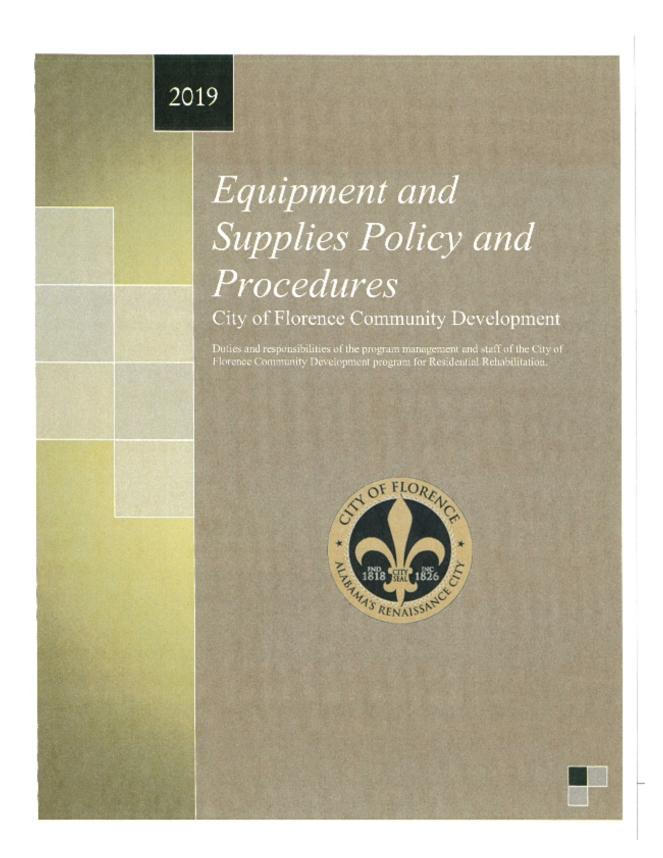
Due to recent updates to the Project Procurement Policy and Procedures, as regulated by HUD, the procedures have updated for the 2015 CDBG program year effective May 1, 2015.

- Follow a free and open competitive process in securing those products or services.
- Properly document purchasing activities and decisions.
- Observe the special rules for particular kinds of purchases (small purchases, Micro-Purchase, competitive sealed bids, competitive proposals, and sole source procurements).
- Properly bond and insure work involving large construction contracts and/or subcontracts.

Note - Micro is any purchase or service that does not exceed \$3,000 does not have to be procured.

Note – A sole source item provider determination will be submitted to the HUD Field Office for approval before purchase.

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All CDBG funded Projects Must be in compliance with the following HUD Regulations.

24 CFR Parts 85.32, 85.33 - Equipment and Supplies

§ 85.32 Equipment.

- (a) Title. Subject to the obligations and conditions set forth in this section, title to equipment acquired under a grant or subgrant will vest upon acquisition in the grantee or subgrantee respectively.
- (b) States. A State will use, manage, and dispose of equipment acquired under a grant by the State in accordance with State laws and procedures. Other grantees and subgrantees will follow paragraphs (c) through (c) of this section.

(c) Use.

- (1) Equipment shall be used by the grantee or subgrantee in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency.
- (2) The grantee or subgrantee shall also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency. User fees should be considered if appropriate.
- (3) Notwithstanding the encouragement in §85.25(a) to earn program income, the grantee or subgrantee must not use equipment acquired with grant funds to provide services for a fee to compete unfairly with private companies that provide equivalent services, unless specifically permitted or contemplated by Federal statute.
- (4) When acquiring replacement equipment, the grantee or subgrantee may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property, subject to the approval of the awarding agency.
- (d) Management requirements. Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, as a minimum, meet the following requirements:
- (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property, the

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location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years,
- (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.
- (4) Adequate maintenance procedures must be developed to keep the property in good condition.
- (5) If the grantee or subgrantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.
- (e) Disposition. When original or replacement equipment acquired under a grant or subgrant is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, disposition of the equipment will be made as follows:
- (1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.
- (2) Hems of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- (3) In cases where a grantee or subgrantee fails to take appropriate disposition actions, the awarding agency may direct the grantee or subgrantee to take excess and disposition actions.
- (f) Federal equipment. In the event a grantee or subgrantee is provided federally-owned equipment:
- (1) Title will remain vested in the Federal Government.
- (2) Grantees or subgrantees will manage the equipment in accordance with Federal agency rules and procedures, and submit an annual inventory listing.
- (3) When the equipment is no longer needed, the grantee or subgrantee will request disposition instructions from the Federal agency.
- (g) Right to transfer title. The Federal awarding agency may reserve the right to transfer title to the Federal Government or a third part named by the awarding agency when such a third party is otherwise eligible under existing statutes. Such transfers shall be subject to the following standards:

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- The property shall be identified in the grant or otherwise made known to the grantee in writing.
- (2) The Federal awarding agency shall issue disposition instruction within 120 calendar days after the end of the Federal support of the project for which it was acquired. If the Federal awarding agency fails to issue disposition instructions within the 120 calendar-day period the grantee shall follow §85.32(e).
- (3) When title to equipment is transferred, the grantee shall be paid an amount calculated by applying the percentage of participation in the purchase to the current fair market value of the property.

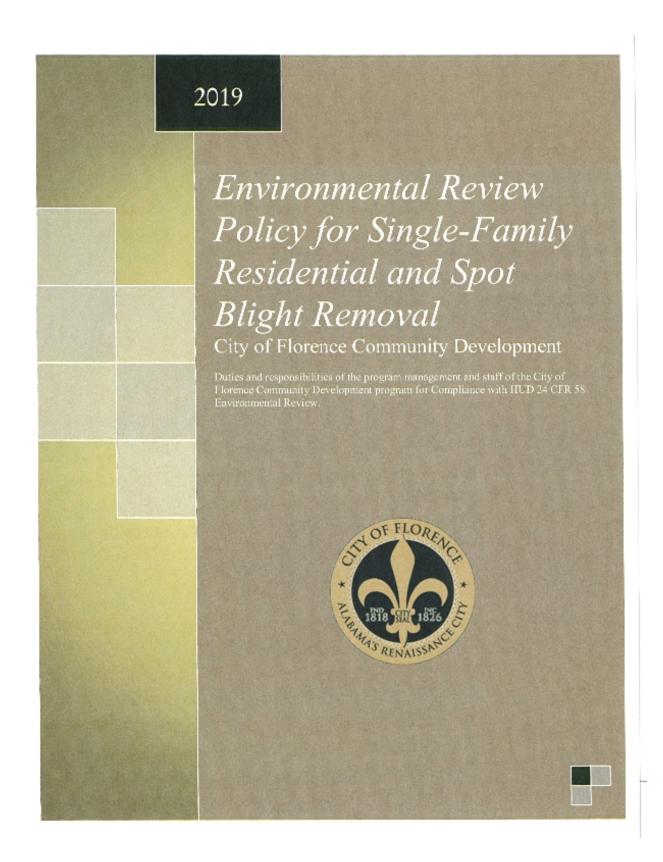
§ 85.33 Supplies.

- (a) Title. Title to supplies acquired under a grant or subgrant will vest, upon acquisition, in the grantee or subgrantee respectively.
- (b) Disposition. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate fair market value upon termination or completion of the award, and if the supplies are not needed for any other federally spensored programs or projects, the grantee or subgrantee shall compensate the awarding agency for its share.

Internal Office Procedures:

- 1. Written approval from HUD HQ that the item is eligible to purchase.
- If the item is eligible to purchase and does not meet the threshold set by HUD to place the item out to bid. The staff obtains three quotes for the item and purchases the item of lowest costs that meets the need unless otherwise noted in file why the higher expense was paid.
- When the item arrives in our office, it is placed on the Inventory List for items purchased under Federal and/or State Programs.
- Annual inventory is required for all items listed on the Inventory List for items purchased under Federal and/or State Programs
- At the point the item is no longer in working order or serving the need to the
 program the item is returned to the City of Florence and eligible for auction thru
 the City of Florence Purchasing Department and placed on the list for Public
 Anction.
- The funds for items sold thru the Public Auction are returned to the Planning & Community Development Department and recorded in IDIS as program income.

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To ensure that projects at sites unspecified prior to the release of funds are in compliance with environmental laws and authorities, the following strategy will be utilized. Projects must comply with environmental statutes, regulations, and Executive Orders other than the National Environmental Policy Act (NEPA), to include:

A. Historic Preservation:

The City will consult with the Alahama State Historic Preservation Office (SHPO) if:

- The project is located inside a Historic District;
- The project is located adjacent to a Historic District
- An event of historical significance happened at the project site;
- The building is more than 50 years old.

Every project must be reviewed to determine whether the structure is included or eligible for inclusion on the National Register of Historie Places by reviewing the list of known districts and listings and contacting SHPO if one of the above items is triggered. If the structure is included or is eligible for inclusion on the National Register, The City of Florence must obtain a determination of "no adverse effect" from SHPO for the proposed activity.

To comply with HUD's guidance on compliance with Section 106 of the National Historic Preservation Act of 1966, The City of Florence will submit to the Alabama Historical Commission, photographs of the existing structure(s) and descriptions of the proposed activity for its review. SHPO must approve the proposed improvements as in conformance with the Secretary of Interior Standards for Rehabilitation and Demolition as specified in the Memorandum of Agreement before the City can proceed.

As part of the Section 106 review, the City of Florence will also comply with Tribal consultation regulations and consult with tribes relevant to the City of Florence, if required by the project. Determination will be made by utilizing the "When to consult with tribes under Section 106" checklist.

B. Floodplain Management:

Environmental factors will be addressed on the Site Specific Tier II Environmental Review. In addition to other requirements of 24 CFR Part 55, a FEMA Map, with the location of the site marked and a determination of the zone must be made. The City's current GIS mapping tool has a FEMA Flood zone layer that can be used to help make this determination.

The City of Florence must conduct an 8-step evaluation (24 CFR 55.20) for all substantial rehabilitation and demolition activities as defined in 24 CFR 55.2(10) that fall within the 100-year floodplain. For activities that are incidental to the floodplain (the structure on site is not located within the 100-year floodplain, but a portion of the property is), the City may elect to place a restrictive covenant on the property that prohibits future development within the floodplain for perpetuity.

For projects that are minor in scope and not classified as substantial as defined in 24 CFR 55.2(10), the above requirement for the 8-step evaluation and restrictive covenant is not applicable.

C. Flood Insurance:

National Flood Insurance Program (NFIP) insurance must be obtained if the building on the property is located within the 100-year floodplain.

Flood insurance must be taken for the life of the loan or the useful life of an improvement funded by a grant, regardless of transfer of ownership. For loans, loan insurance, or guarantees, the amount of flood insurance coverage need not exceed the outstanding principal balance of the loan. For grants and other non-loan forms of financial assistance, the amount of the flood insurance coverage must be at least equal to the maximum limit of coverage made available by the Act with respect to the particular type of building involved, or the development or project cost, whichever is less. The development or project cost is the total cost for acquiring, construction, repairing, or improving the building. Proof of insurance from the homeowner will be part of the application file.

D. Wetland Protection:

Environmental factors will be addressed on the Site Specific Tier II Environmental Review. In addition to other requirements of EO 11990, a Wetland inventory Map with the location of the site marked and a determination of the impact to wetlands must be made. The City's current GIS mapping tool has a Wetland Layer that can be used to make this determination.

Each project will be reviewed to determine if it is in a wetland. If the project is within a wetland, the requirements of EO 11990 related to wetlands will be followed. Also, the Corps of Engineers will be consulted regarding a 404 permit.

If the project is incidental to a designated wetland, a restrictive covenant must be placed on the property that prohibits future development within the wetland pursuant to 24 CFR 55.12(c)(6); otherwise, the 8-Step evaluation must be completed or the activity must be rejected.

E. Coastal Areas Protection and Management:

The City of Florence is not located within the Alabama Coastal Zone Management Are. See compliance with this on the Tier I.

E. Sole Source Aquifers:

No sole source aquifers exist in the State of Alahama. See Tier 1

G. Endangered Species:

Environmental Factors will be addressed on Site Specific Tier II Environmental Review. The US Fish and Wildlife Services will be contacted for consultation information and should include a description of the proposed activities, the addresses and GPS location of the project site, and the current site development conditions (i.e. vacant lot, developed with a single lianily home).

H. Wild and Scenic Rivers:

The only designated Wild and Scenic River in Alahama is the Sipsy River which is not located in Lauderdale County in Alahama. The Nationwide Rivers Inventory (NRI) lists one system within the City of Florence (Cypress Creek); however, since the project scope only entails rehab of existing single family homes, the demolition of residential blighted properties; there is no additional compliance triggered. See compliance with this factor on the Tier 1.

I. Air Quality:

Not applicable. This project does not include new construction or conversion of land use. See compliance with this factor on the Tier I.

J. Farmland Protection:

Not applieable. This project does not include any activities, including new construction, acquisition of undeveloped land, or conversion that could potentially convert one land use to another. See compliance with this factor on the Tier I.

K. Noise:

Environmental factors will be addressed on the Site Specific Tier II Environmental Review. Noise calculations will be required for projects that have the ability to attenuate for noise (most replacement, window replacement, insulation replacement, etc., but no mitigation will be required).

L. Runway Clear Zones:

Not applicable. The City of Florence does not have a primary, commercial or military airport. The nearest airport, Muscle Shoals Regional Airport, is located live miles from the City of Florence, See compliance with this factor on the Tier I.

M. Thermal and Explosive Hazards:

Not applicable. These projects will not increase the density at the site. See compliance with this factor on the Tier I. This factor applies only to new construction, reconstruction, or rehabilitation that increases the density of a home or rehabilitation that makes a previously un-inhabitable building habitable. If a project is identified as having tanks or bazards in the area, then the requirements of 24 CFR 51 Subpart C will be followed as well as contacts made with the Fire Department.

N. Toxic and Hazardous Chemicals:

Environmental factors will be addressed on the Site Specific Tier II Environmental Review.

Determination of Toxic and Hazardous will be completed using NEPAssist to indicate that the property is a.) listed on an EPA Superfund National Priorities or CERCLA list or equivalent State list; b.) located within 3,000 feet of a toxic waste land field site; e.) has an underground storage tank other than a residential fuel tank exist; and known or suspected to be contaminated by toxic chemicals or radioactive materials (attach a copy of the NEPAssist review with the location of the property marked.

All activities will be reviewed for compliance with the Toxic and Hazardous Chemicals requirements. The City of Florence will give particular attention to any site where an activity is on or is within one mile of an area that contain or may have contained hazardous waste, such as dumps, land fields, and industrial sites.

O. Environmental Justice:

Projects eligible for funding are targeted towards low and moderate income households. There is no expected adverse impact to low income and minority populations. See compliance with this factor on the Tier 1.

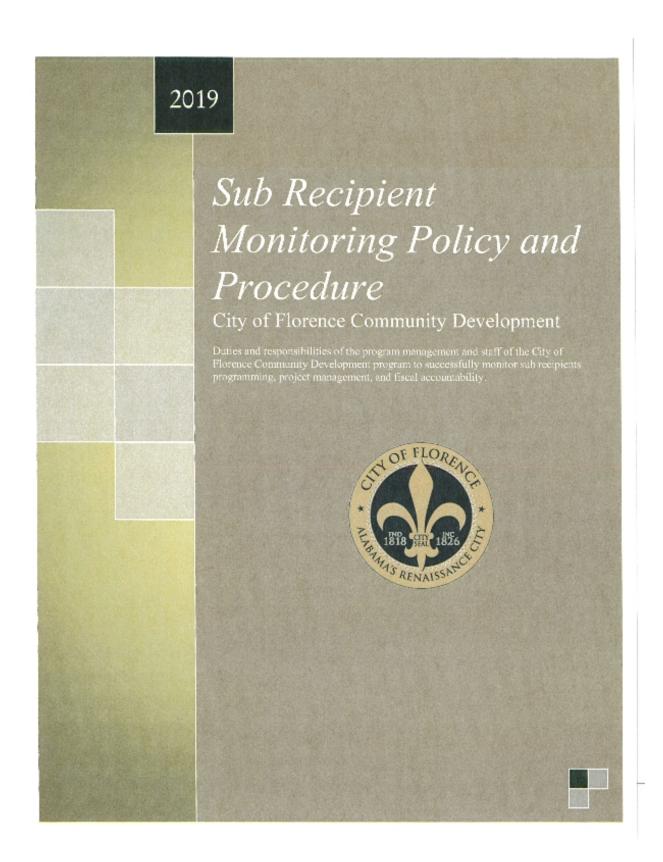
P. Local Regulations:

All projects will be reviewed to determine that the site is in compliance with all City of Florence Ordinances.

Documentation Compliance:

The City of Florence Community Development Department will maintain documentation of all required consultations pertaining to each funded project. The information will include, but not limited to:

- The address(cs) of each project;
- A cheeklist and supporting documentations showing that each proposed project will
 comply with the National Environmental Policy Act and other federal, state and local
 environmental laws and authorities;
- · Citations for all applicable environmental consultation and permits;
- A finding which sets forth that the implementation of all the project(s) will not affect the
 original assessment finding.
- Findings must be made prior to any approval or other commitment action by other program personnel;
- · Any mitigating requirements.



Sub-recipients will be monitored to ensure compliance with all of the requirements outlined in their agreement with the grantee. Not only is this just good management practice but it is also required by HUD regulations.

City of Florence Planning and Community Development staff will contact the sub-recipient to arrange monitoring visits. The sub-recipient will be informed regarding the initial records to be reviewed. These records should be ready for review upon the monitor's arrival and available at the working space set up for the monitor.

Monitors meet with sub-recipient director to answer any questions regarding the monitoring process and are introduced to appropriate staff to begin work. Additionally, monitors may request the following documentation to be at hand prior to the beginning of the monitoring visit:

- a. Time and attendance reports (time sheets or time cards);
- Payroll register;
- c. Cash receipts journal;
- d. Check disbursement journal or check register;
- Bank statements, canceled cheeks, and/or direct deposit verification;
- f. General ledgers;
- g. Invoices and purchase orders;
- h. Bank reconciliation; and/or
- Any additional item (vouchers, documents, financial reports, records, etc.) needed to verify transactions.

The Monitoring Process

The monitor will review records selected and discuss record keeping methods with staff who maintain them. Copies of certain documents and records may be made for purposes of preparing the report. Records which will be reviewed by the monitor include but are not limited to:

Units of service reports sent to the city for the period under review.

Daily logs, time sheets, or other documents used to derive the number of units reported.

A list of clients served during the contract period must be provided to the monitor.

- The monitor will check the sub-recipient records against City records regarding these reports for the following:
 - Determine if amounts in sub-recipient records reported for each quarter match amounts noted in City records.
 - Determine if reports are presented in a timely manner (by the date specified in the contract).
 - c. Determine if reports are completed in a satisfactory manner.
 - Determine if the quantity of units provided is roughly proportionate to the amount of the allocation expended.
 - Determine if the sub-recipient is significantly behind in the provision of units.

- The monitor will review documents used by the sub-recipient to derive the number of units reported. Sub-recipients are required to submit the ethnicity and units of service reports on a quarterly basis.
- The monitor will review client files for:
 - Documentation of eligibility which is dated within twelve months of the sample service date:
 - i. Documentation of residence within the city limits.
 - ii. Documentation of income equal to or lower than 80% of the median income or as adjusted for family size. HUD updates the income limits annually and they are available online. Applicants are responsible for ensuring that the most up to date income limits are used when documenting L/M benefit.
 - Documentation of the provision of services which meet the terms of the contract
 - b. Determine if date of service and type of service provided which was taken from the fully log is also recorded in the client file and appears to be reasonable;
 - Review complete file for each client determining whether services being provided are in accordance with the contract, whether client is in contract's target population (such as client who is documented as homeless being visited at home); and
 - Where applicable, determine if client notes are dated, reflect the units provided, are signed by the caseworker, complete and informative as to the client's progress.
 - iii. Determine if files are complete and maintained in an orderly fashion.
 - Obtain blank copies of intake and other pertinent documents used by subrecipient.

Record Review

- Salarics
 - a. Review time and attendance reports for time billed to CDBG and verification of reports by supervisor.
 - Check to see if there is a clear audit trail between the time and attendance reports, payroll register, general ledger accounts and federal & state reports.
 - c. Test computation for gross amounts, deductions, and net payments.
 - Verify canceled cheeks for amounts and endorsements.
 - Verify employees' time from time eards to the time reported to CDBG on reimbursement requests.
- 2. Verify that the requested salary reimbursements are allowable under contract terms.
- 3. Property and Equipment
 - a. Verify invoices and payments.
 - Verify purchase of equipment is in agreement with general ledger account and financial reports.
 - Ensure that purchased equipment is allowable.
 - Verify calculation of depreciation (if applicable).
 - e. Make physical inspection of equipment (if applicable).
- 4. Other Operating Expenses

- a. Examine invoices and related canceled cheeks.
- h. Review invoices for approvals and account distribution.
- c. Determine if the costs are allowable,
- d. Verify sub-recipient's line item costs to amounts requested for reimbursement.
- Verify that amounts requested for reimbursement agree with posting to general ledger accounts.
- 5. Revenue
 - Verify amounts and use of any program income received.
- 6. Overall Accounting Review
 - Review the process used to record the various transactions and determine if it is effective.
 - Review the actual transactions and their supporting documentation, determining eligible reimbursement expenses. In order for the expenditure to be considered eligible for reimbursement, the following requirements must be met.
 - i. The expenditure must be for the current funding period;
 - ii. If must be an expenditure related to CDBG activity; and
 - iii. It must be an expenditure permitted by the contract.
 - Review the overall sub-recipient performance to determine if it is within compliance according to the contractual terms and conditions.
 - Determine if the prior year's monitoring findings have been corrected and are not being repeated.

Post-Monitoring Process

The monitor will call or meet with the sub-recipient director to discuss results of monitoring. The Director may invite staff and/or board members as he/she deems appropriate. The following will be discussed:

- 1. Discuss findings, if any, and methods of correcting each individual deticiency.
- Discuss concerns, if any, and methods of correcting concerns.
- Discuss any observations made regarding the sub-recipient, offer technical assistance where applicable.
- 4. Answer any questions director or staff may have.

Within thirty (30) days after the completion of the monitoring visit or desk-top review, a written report of the results of the monitoring visit will be forwarded to the sub-recipient. If the program and fiscal monitoring were performed concurrently, the reports for both will be combined under a single cover letter. The monitoring report contains:

- 1. A detailed list of areas reviewed.
- A detailed list of findings, if any.
- A recommendation will accompany each finding explaining how the deficiency can be corrected.
- 4. A detailed list of concerns, if any.
- Depending on the nature of the concern, a recommendation may be included on how to climinate the concern.
- 6. Observations, if any, made regarding the sub-recipient's operation.
- If findings are severe, the letter accompanying the report may place a hold on further reimbursements to the sub-recipient until the findings are cleared.

Within thirty (30) days after receipt of the monitoring report, the sub-recipient must submit a written response to the monitoring report. The response should be addressed to the Director of the Planning and Community Development department of the City of Florence. The response should include:

- 1. A response to each individual finding and concern, if applicable.
- Copies of any documentation to back up the response to the findings.

Upon receipt of the sub-recipient's response to the monitoring report, the program and fiscal monitors will review the response to determine if the findings have been satisfied. A written response to the sub-recipient's response will be sent to the sub-recipient, to include the following:

- Those findings which have been satisfied will be noted as closed. If all findings are closed, the sub-recipient's monitoring for the year under review is considered to be complete.
- Findings which are not satisfied will remain open, and will require further response or action on the sub-recipient's part.
- The sub-recipient will be given an adequate period of time to take any further action needed to correct the findings and respond in writing.
 - If these actions are satisfactory, the findings are noted as closed and the monitoring is considered to be complete.
 - If these actions are not satisfactory, further correspondence is required until such time as all findings are closed and the monitoring is concluded.
 - c. The close of the contract does not necessarily close the monitoring.

Correspondence will continue until all findings are closed.

In the event that a sub-recipient and the monitor cannot come to an agreement on one or more findings of the City's monitoring visit, an appeal may be made in writing to the Director of the Planning and Community Development Department of the City of Florence. The appeal should state clearly the finding being appealed, and the basis for the appeal. HUD does not accept appeals of decisions by the City regarding monitoring issues.

Summary

Effective project management is a responsibility of both parties: the grantee and the subrecipient. A successful project requires:

- The accountability of sub-recipients;
- 2. The clarity and consistency of performance;
- 3. The clarity and consistency of corrective actions;
- 4. The continuous provision of feedback; and
- 5. Timely communications with sub-recipients and the recipient.

City of Florence Alabama Community Development Block Grant Citizen Participation Plan

Introduction

The City of Florence, Alabama encourages participation of citizens in the development and planning of activities relative to its Community Development Block Grant (CDBG) Program and the Emergency Solutions Grants (ESG). Annual entitlement grants are made to the City from the U.S. Department of Housing and Urban Development (HUD) for the purpose of addressing the needs specifically of low to moderate income residents. Through this Plan, citizen involvement in the CDBG and ESG programs are designed to be an open process in which citizens are informed and can influence decisions on activities.

Access to Information and Records

The City, through its Planning and Community Development Department, offers citizens access to information and records relating to the City's proposed use of CDBG and ESG funds. The City will make available to citizens, records regarding the past use of funds, the Citizen Participation Plan, the Consolidated Plan, and any substantial amendments proposed. Records are available during regular business hours at Florence City Hall in the Planning and Community Development Department.

Public Hearings

The City will hold a public hearing to obtain the views of citizens, and to respond to proposals and questions, on the City's housing community development needs. This hearing will be held early in the planning process to allow citizens and community and neighborhood organizations an opportunity to make recommendations and comments. This hearing will be held at a time and location convenient to potential or actual beneficiaries, with accommodation for the handicapped.

Official notice will be placed on the City's website at www.florenceal.org. All public hearing locations will be wheelchair accessible and accommodations for sign interpretive services can be made available if requested one week in advance of meetings. Once the Consolidated Plan and/or the Annual Action Plans are completed; they will be placed on review for 30 days for public comments.

Publication of Final Statement

The Executive Summary of the Consolidated Plan will be published and made available at the Florence City Hall Planning and Community Development Department, Suite 115 and the City's web site at www.florenceal.org. The summary will describe the contents

Revised 10/15/2019

and purpose of the Consolidated Plan as well as identify where the full text of the Consolidated Plan may be reviewed.

Technical Assistance

The City will provide technical assistance to neighborhood citizen committees, civic groups, and individual citizens in understanding the Community Development program requirements, policies, and regulations governing the CDBG Entitlement program.

Complaint Procedure

Any citizen or group of citizens, with specific complaints regarding parts or the entire CDBC Entitlement program has the right to appeal through specified channels. Written complaints will be responded to in writing within 15 working days from the data received by the Planning and Community Development Department.

 Any person or group that is aggrieved by an action or proposal related to the CDBG Entitlement program shall first make their complaint known to the Planning and Community Development Department:

Melissa Bailey, Director of Planning and Community Development

City of Florence

P.O. Box 98

Florence, AL 35631

(256) 740-8806

2.) If the aggrieved person or group does not obtain satisfactory results from appealing to the staff, then an appeal may be made to the local governing body through the Office of the Mayor:

Office of the Mayor

City of Florence

P.O. Box 98

Florence, AL 35631

(256) 760-6400

 If the aggrieved person or group desires to carry appeal forward from the local governing body they may contact:

U.S Department of Housing and Urban Development

Office of Community Planning and Development

950 22™ Street North, Suite 900

Birmingham, AL 35203

Revised 10/15/2019

Bilingual

English being the predominant language of all neighborhoods in the City of Florence, the requirement for meeting the needs of non-English speaking residents is not applicable.

Substantial Amendments

The City of Florence will amend its Final statement whenever it decides not to carry out an activity described in the Final Statement, or decides to carry out an activity not previously described, or decides to substantially change the purpose, scope, location, beneficiaries, or budgeted dollar amount of an activity. Any new project or transaction to existing activities over \$150,000.00 or as noted above changes in the purpose, scope, location and beneficiaries, will constitute a substantial change or amendment for purposes of requiring a written amendment.

Prior to amending its Final Statement, the City will provide citizens with reasonable notice of, and an opportunity to comment on such proposed amendments, by publication on the City of Florence Planning & Community Development website at least 30 days prior to amendment by the City. The City will make available to the public, and will submit to HUD, a description of amendments adopted.

https://florenceal.org/departments/planning_and_community_development/index.php

Performance Report

Citizens will be given a comment period of a minimum of 15 days to provide input on the Consolidated Action Plan and Evaluation Report (CAPER).

Applicable

This Citizen Participation Plan shall apply to all Community Development Block Grant Entitlement activities that are on-going as of the adoption of said Plan, as well as all future activities.

This Plan shall remain in effect, from its adoption date, and until all activities assisted under the CDBG Entitlement program are completed, or until it is superseded by a new or amended Plan.

Revised 10/15/2019

Grantee SF-424's and Certification(s)

						OMB Number 4040-0004 Expiration Date: 12/01/2022
Application for	Federal Assista	nce SF-424				
* 1. Type of Suomiss Preauplication Application Changed/Com	ion ected Application	New	h Revision Other (Sp:	, select appropriate letter(s) schy):		
*3. Date Received: 04/31/2020		4. Applicant Identified				
5e. Federal Entity Me State Use Only:	artifier:		5b. Fede	aal Award Identifier:		
6. Data Received by	Slate:	7. State Application k	erlifer:			
8. APPLICANT INF						
		e. Clabana				
*a. Legal Name Gity of Clorence, Alabama *b. Employar/Taypayer Conditional Number (EIN/TIN); 63-5001281				an zational DUNS:		
d. Address:						
* Street1: Sireet2: * Gby: County/Parish: * State: Province:	110 W folloge Stract, Suite 115 Florence Al: Algience					
* Country: * Zip / Postal Code:	25631-9001		DSA	DRIGED SCACES		
e. Organizational (Unit:					
Department Name: If anything and Counting y Des			Division	Nama:		
f. Name and conto	et Information of p	person to be contacted on ma	ittars inv	olving this application:		
Proffic (al-) Middle Name: (al-) * Last Name: (al-) Suffic	iley	* Frst Namo	: V.e.	iora		
Title: Climentar						
Organizational Affili	alion:	200000000000000000000000000000000000000				
* Telephone Numbe	N: 256-746-880	5		Fax Number: 255-7	50-5323	
	/Kflorenceal.co					

pplication for Federal Assistance SF-424
). Type of Applicant 1: Select Applicant Type:
: Dily or Township Government
ge of Applicant 2: Select Applicant Type:
pe of Applicant 3: Select Applicant Type
Other (specify):
10. Name of Federal Agency:
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. Catalog of Federal Domestic Assistance Number:
FDA Title:
12. Funding Opportunity Number:
DBC
The: promotify Sevelopment Look Koon
minuty sees openit took word.
3. Competition Identification Number:
ide:
4. Arens Affected by Project (Cities, Counties, States, etc.):
Agd Attachment Dalate Attachment Www.Attachment
ACCIAINCE MINISTER 223 YEAR COLUMN
15. Descriptive Title of Applicant's Project:
Thy of Elemente Community Development Plack Grant
Each supporting documents as specified in agency instructions.
Add Attachments Delete Attachments Delete Attachments

Application for Federal Assistance SF-424								
16. Congressio	nal Districts Of:							
1a. Applicant	*a. Applican: 5 *b. Program/Project 5							
Attach an additional list of Program-Project Congressional Districts if needed.								
Acd Attachment Delete Attachment Wew Attachment								
17. Proposed Project:								
* a. Stert Date: 05 / c1/2000								
18. Estimated Funding (5):								
* a. Federal		327,756.00						
* b. Applicant		0.00						
'c State		0.00						
" d. Local		0.00						
1e. Other		0.00						
16. Program inc.	oma	23,651.00						
±g. FOTAL		351,437.30						
* 19. is Applica	tion Subject to Review By	State Under Exe	cutive Order 12372	Process?				
a. This application was made available to the State under the Executive Order 12372 Process for review on								
b. Program	is subject to E.O. 12372 b	ut has not been s	elected by the Stat	e for review.				
C. Program is not covered by F.O. 12372								
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)								
Yes	No	Legelski meditis. (ii	r 188, provide ax	pansion in macini	t.j			
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21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or daims, may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)								
☐ "TAGREE								
"The fist of conflications and assurances, or an internet site where you may obtain this list is contained in the announcement or agency specific nativeticins.								
Authorized Representative:								
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ASSURANCES - CONSTRUCTION PROGRAMS

OM3 Number: 4040-0008 Expiration Date: 02/28/2022

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 (0348-0042), 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 not field.

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-hederal share of project costs) to ensure pruper 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 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 awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination curing the useful life of the project.
- 4 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 engineering supervision at the construction site to 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 agency 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 appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental 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, Subsort F).
- Will comply with the Lead-Based Paint Poisoning Prevention Art (42 U.S.C. §§4801 et sec.) 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) Title VI of the Civil 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 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, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 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 ee 3), as amended, relating to confidentiality of alcohol and drug abuse palient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seg.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

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- 11. Will comply, or has already complied, with the requirements of Tilles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equilable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in rest property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Halch 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.
- 13. 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 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding abor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Dissister 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 1909 (P.L. 91–190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodpisins in accordance with EO 11988; (c) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et sec.); (f) conformity of

- Federal actions to State (Clean Air) Implementation 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 crinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of ondangered 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 ot seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, 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. §\$469a-1 et 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, Loos, Covernments, 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 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipionts 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 commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subsecurits under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Short last	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Fierence, Mabanana	04/01/2020

SF-4240 (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statures and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any enoperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Mayor

Title

Specific Community Development Block Grant Certifications

The Britilement Community certifies that:

Citizen Participation – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CTR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan - It is following a current consolidated plan that has been approved by HUD.

Use of Funds - It has complied with the following criteria:

- 1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).
- 2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 2023 [u period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

- A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws - It will comply with applicable laws.

Signature of Authorized Official

Date

Mayor Tille

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular organicy as specified in 24 CFR 570,208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature of Authorized Official

Date

<u>Mayor</u> Title

Appendixx - Alternate/Local Data Sources

1 Data Source Name

US Census Population

List the name of the organization or individual who originated the data set.

United States Census

Provide a brief summary of the data set.

Base set data for population 2013

What was the purpose for developing this data set?

I used the 2013 base data set to determine percent of change from the 2010 count.

Provide the year (and optionally month, or month and day) for when the data was collected.

2013

Briefly describe the methodology for the data collection.

The 2013 census data was generated through a mailed survey to every household address within the City of Florence.

Describe the total population from which the sample was taken.

40,059

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

According to the data 75.1% of the population measured were White, 19.4% were Black, .4% American Indian, 1.4% Asian, .1% Native Hawiian or other, 3.6% Hispanic

2 Data Source Name

City of Florence Needs Assesment & Analysis of Imp

List the name of the organization or individual who originated the data set.

City of Florence Department of Planning and Community Development

Provide a brief summary of the data set.

The data identifies a high need for affordable housing; a need to increase the supply of supportive hosing for persons with special needs; a need for better availability to low interest loans for individuals that are considered low/mod income; the revitalization of dilapated neighborhoods; a need to increase servies that provide for low/income individuals.

What was the purpose for developing this data set?

This survey was developed to reach out for further Citizen Participation and determine what needs exists and identify any impediments to fair housing.

Provide the year (and optionally month, or month and day) for when the data was collected.

March-April 2015

Briefly describe the methodology for the data collection.

The survey generated an analysis of high, medium, low, no need data.

Describe the total population from which the sample was taken.

93 individuals participated in the survey

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

Demographics of participants was not provided.

3 Data Source Name

2019 Point in Time Data

List the name of the organization or individual who originated the data set.

Homeless Care Council of Northwest Alabama

Provide a brief summary of the data set.

2019 Point in Time Data

What was the purpose for developing this data set?

Homeless Count

Provide the year (and optionally month, or month and day) for when the data was collected.

January 2019

Briefly describe the methodology for the data collection.

Individual Surveys

Describe the total population from which the sample was taken.

According to the 2018 ACS the population estimate as of July 1, 2018 is 40,428.

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

Any homeless individual the volunteer came in contact with on the Point in Time date were surveyed.

4 Data Source Name

CONSOLIDATED PLANNING/CHAS DATA 2012-2016

List the name of the organization or individual who originated the data set.

OFFICE OF POLICY DEVELOPMENT AND RESEARCH (PD&R)

Provide a brief summary of the data set.

It overviews the 2012-2016 ACS data for Lauderdale County, Alabama.

What was the purpose for developing this data set?

It was created to see Income Distribution, Housing Problems, Severe Housing Problems, Housing Cost Burden, Income by Housing Problems (Owners and Renters), Income by Housing Problems (Renters only), Income by Housing Problems (Owners only), and Income by Cost Burden (Owners and Renters) and break down those numbers.

Provide the year (and optionally month, or month and day) for when the data was collected.

2012-2016

Briefly describe the methodology for the data collection.

Throught the ACS, CHAS query tool, and US census data was collected.

Describe the total population from which the sample was taken.

38,360 from the population of Luaderdale County, Alabama

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

Demograpcis were not ascertain, The units of measure were housing, Owner/Renter, Income levels, There was 38,360 units surveyed.

5 Data Source Name

2014-2018 ACS 5-Year Data Profile

List the name of the organization or individual who originated the data set.

US census bureau

Provide a brief summary of the data set.

This covers the 2014-2018 ACS Data Porfile. It covers Social, Economic, Housing, and Demographic Characteristics that the survey is on.

What was the purpose for developing this data set?

To garner a 5 year tend of the population characteristics of Lauderdale County, Alabama.

Provide the year (and optionally month, or month and day) for when the data was collected.

2018

Briefly describe the methodology for the data collection.

Survey by ACS

Describe the total population from which the sample was taken.

90,376

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

It covers the Social, Economic, Housing, and Demographic Characteristics.