

**FY 24/25 Annual Action Plan &
Analysis of Impediments to Fair Housing
Public Hearing
&
FY 24/25 Grant Workshop**



Public Hearing

- Manatee County is preparing two documents for submittal to the U.S. Department of Housing and Urban Development (HUD):
 - **2024 Annual Action Plan**
 - **Analysis of Impediments to Fair Housing Choice (AI) Report**
- These documents support the following federal grant programs:
 - **Community Development Block Grant (CDBG)**
 - **HOME Investment Partnerships (HOME)**
 - **Emergency Solutions Grant (ESG)**



2024 Annual Action Plan

- Manatee County's one-year plan to allocate federal funding from HUD
 - **Program Year 2024 (Oct. 1, 2024 – Sept. 30, 2025)**
- Identifies projects to be funded during the program year
- Projects are selected based on funding eligibility and the five-year goals and priority needs of the 2023-2027 Consolidated Plan



2023-2027 Goals and Priority Needs

■ 1. Increase Access to Affordable Housing

- Preserve and Maintain Existing Housing Stock
- Increase Supply of Affordable Housing
- Fair Housing & Equitable Access
- Rental Assistance
- Down Payment Assistance

■ 2. Reduce Homelessness in Manatee County

- Transitional and Supportive Housing
- Homeless Prevention Assistance
- Homeless Outreach and Supportive Services
- Shelter Facilities and Operations



2023-2027 Goals and Priority Needs

■ 3. Support Healthcare and Wellbeing Activities

- Senior Programs and Facilities
- Substance Abuse and Mental Health Services
- Health and Dental Care for Uninsured

■ 4. Supportive Services & Economic Development Activities

- Employment Training
- Youth Education, Protection, and Facilities
- Senior Programs and Facilities
- Basic Needs Assistance
- Transportation Services



2023-2027 Goals and Priority Needs

- **5. Expand Community Development Strategies**
 - Public Facilities/Improvements
 - Eliminate Blight
 - Planning, Preparedness, & Resiliency
- **6. Program Administration**



2023 Annual Action Plan Projects

- Housing Legal Services
- Homeowner Down Payment Assistance Program
- Homeowner Rehabilitation/Replacement Program
- Tenant-Based Rental Assistance
- Affordable Housing (Habitat for Humanity)
- Senior Services/Food Assistance
- Community Resource Center (Samoset)
- Health Services (e.g., vision, dental, etc.)
- Public Facilities Improvements
- Homeless Prevention, Shelter, etc.
- Planning and Administration



2024 Annual Action Plan Discussion (10-Minutes)

- **For the 2024 program year, what types of projects could address these goals?**
 - Access to Affordable Housing
 - Reduced Homelessness
 - Healthcare and Wellbeing Activities
 - Supportive Services & Economic Development
 - Community Development Strategies



Fair Housing & Equal Housing Opportunity

- **What is Fair Housing?**

- Equal opportunity to choose where you live – if you can pay the rent or mortgage – without being discriminated against or treated differently than other people.

- **What is the “Equal Housing Opportunity” symbol?**

- Housing professionals use this symbol to show that they will not discriminate against you when you are looking for a home.



Fair Housing Act

- Title VII of the Civil Rights Act (1968)
- Housing discrimination is illegal under the Fair Housing Act
 - Fair housing is not optional – It is the law!
 - Promotes integrated communities
 - Seeks to prevent prejudice
- Who is protected?
 - Race or Color
 - Religion
 - Sex (incl. gender identity and sexual orientation)
 - National Origin
 - Familial Status
 - Disability



What is prohibited?

- It is illegal discrimination to take any of the following actions because of race, color, religion, sex, national origin, familial status, or disability:
 - Refuse to rent or sell
 - Refuse to make available or negotiate
 - Refuse to make a mortgage loan or provide insurance
 - Impose different terms or conditions
 - Threaten, coerce, or intimidate
 - Make discriminatory advertising



Discriminatory Housing Practices

- Failing to accept or consider an offer
- Refusing to sell to, rent to, or negotiate for sale or rental
- Imposing different sale prices, terms, or rental charges
- Using different qualifications, criteria, or promotional activity
- Evicting any tenant on a protected basis or the characteristics of a tenant or tenant's guests
- Steering
- Assigning a person to a particular section of a community, neighborhood, development, or floor of a building
- Restricting housing choices
- Using codes or devices to segregate or reject persons
- Refusing to show listings in certain areas



Examples of Discriminatory Practices

“I don’t think your wheelchair would fit through our doors.”



The sign says, “vacancy” but the manager says, “we just rented it.”



“You really wouldn’t have enough space with so many children.”



Only tenants of a certain race or ethnicity get eviction notices, etc.



Analysis of Impediments to Fair Housing Choice (AI) Report

- Fulfills HUD's directive to **Affirmatively Further Fair Housing**
- Supports **Equal Housing Opportunity**
- Documents efforts to eliminate racial and ethnic segregation, physical and other barriers to persons with disabilities, and other discriminatory practices in housing.
- Typically updated every five-years



Analysis of Impediments to Fair Housing Choice (AI) Report

- **What are “Impediments to Fair Housing”?**
 - Fair Housing Issue
 - A condition... that restricts fair housing choice or access to opportunity, such as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights laws or regulations related to housing. 24 C.F.R. § 5.152
 - Fair Housing Contributing Factor
 - A factor that creates, contributes to, or increases the severity of one or more fair housing issues. 24 C.F.R. § 5.152



2017-2021 Assessment of Fair Housing

■ **Contributing Factors in Manatee County**

- Location of affordable housing
- Location of proficient schools
- Lack of accessible housing in a range of unit sizes
- Lack of publicly supported housing for persons with disabilities
- Lack of assistance for housing accessibility modifications
- Lack of access to financial services
- Proportion of deteriorated and abandoned properties
- Lack of community revitalization strategies
- Lack of public and private investment in neighborhoods
- Availability, type, frequency, and reliability of public transportation
- Lack of local public and private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations



2017-2021 Assessment of Fair Housing

■ Manatee County's Fair Housing Goals

1. Identify opportunities to reinvest in R/ECAPs to eliminate blighted conditions and spur redevelopment.
2. Address contributing factors of poverty and segregation.
3. Strengthen code enforcement on substandard rental units.
4. Increase availability of affordable housing in Manatee County.
5. Expand Fair Housing education within Manatee County.
6. Provide services that improve financial literacy and access to financing for minority and low-income populations.
7. Improve the enforcement of Fair Housing laws and ordinances.
8. Provide better access to opportunity for protected classes through public services.



Fair Housing Discussion (10-Minutes)

- **Have you or someone you know or have known, experienced housing discrimination?**
- **Do you have any Fair Housing concerns within Manatee County?**
- **Are sufficient Fair Housing programs and resources available in Manatee County?**



Next Steps for Action Plan & AI Report

- Public Hearing/Focus Group Meetings – February/March 2024
 - *FY 24/25 Grant Workshop, MCHA and AHAC Meetings*
- 30-Day Comment Periods
 - Draft AI/Fair Housing Report – April/May 2024
 - Draft Annual Action Plan – June/July 2024
- BCC Public Hearing – Final Annual Action Plan – July/August 2024
- Submittal to HUD – August 2024



Break-Time 10-Minutes



Community Development Division

FY 24/25 Grant Workshop



Julia Vieira
Community Development Project Manager
February 29, 2024

Workshop Agenda

- County General Priorities
- Funding Sources
 - CDBG & HOME
 - CDBG-CV & HOME-ARP
- Application Process
- Five Elements for Funding
- Selected Projects Requirements
- Timeline from Application to Implementation
- Questions and Closing



County Priorities

- Community Land Trust (CLT)
- Projects that focus on serving :
 - Individuals or Families at-risk or experiencing Homelessness
 - Vulnerable children and youth
 - Veterans
- Projects that directly support County's Initiatives to address homelessness:
 - Under One Roof
 - Fresh Start
- Transitional and Permanent Supportive Housing



Programs

- **Community Development Block Grant (CDBG) Program:**
 - Housing Programs
 - Public Facilities/Infrastructure Improvements
 - Public/Social Services Projects
- FY 2024/25 – Est. \$1.8 Million in CDBG funding is anticipated
- Funds are subject to a 15% Public Service Cap (approximately \$270,000) and 20% Administration Cap (\$360,000)



Programs

- **HOME Investment Partnerships Program:**
 - Housing Construction, Rehabilitation, or Demolition of Dilapidated Housing
 - CHDO Acquisition Rehabilitation/Construction
 - Tenant-Based Rental Assistance
 - Homeowner Assistance
- FY 2024/25 – Est. \$675,000 in HOME funding is anticipated
- Funds are subject to a 15% CHDO set-aside (approx. \$101,250) and 10% administration cap (\$67,500)



Programs

- **Community Development Block Grant - CARES (CDBG-CV) Program**
- Must have tieback *to prevent, prepare for, and respond to* COVID-19 pandemic (i.e. focus to serve groups most economically impacted, resiliency to prevent future pandemics)
 - Housing-related activities (i.e. acquisition or rehabilitation)
 - Public Facilities/Infrastructure Improvements (i.e. retrofits, acquis/rehab/conv of shelters and transitional or group housing)
 - Extend Non-Congregate Emergency Shelter Services
- Available to Commit in FY 2024/25 –\$550,000.00
- Deadline for Expenditure – June 30, 2026



Programs

■ HOME-American Rescue Plan (ARPA):

Manatee Allocation Plan Eligible Types of Activities	Proposed Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$300,000*		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant-Based Rental Assistance (TBRA)	\$708,353		
Development of Affordable Rental Housing	\$763,740		
Non-Profit Operating	\$118,130*	5%	5%
Non-Profit Capacity Building	\$118,130*	5%	5%
Administration and Planning	\$354,415	15%	15%
TOTAL HOME-ARP ALLOCATION	\$2,362,768		

*Set-Aside for Under One Roof Family Shelter project

HOME-ARP Qualifying Populations

1. Homeless (McKinney-Vento Act definition)
2. At-Risk of Homelessness (McKinney-Vento Act def.)
3. Persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
4. Persons at greatest risk of housing instability (i.e., < 30% AMI, or < 50% AMI and at-risk of homelessness)
5. Veterans or families of veterans that meet 1. thru 4.



County Priorities

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Application Process



Web-Based Neighborly Software System

- Participant Access to Portal

<https://portal.neighborlysoftware.com/manateecountyfl/Participant>

- Select the right type of Application:

- **Public Facilities / Improvements / Housing** – For acquisition, construction or demolition related projects
- **Public Services** – For services, economic development or rental assistance

- One application per project

IMPORTANT

Welcome to the Manatee County Participant Portal

New applicants must first register their account before signing in to the portal

Sign In Register

Email Address

Password

Remember my email address

Sign In

Forgot your Password?

Neighborly Software

Application Name	Description	Action
Downpayment Assistance	Select this option if you are an APPROVED LENDER applying on behalf of an applicant for the Down Payment Assistance program.	Start Application
Affordable Housing Designation	Select this option if you are a for-profit, non-profit, or CHDO Developer applying for Affordable Housing Designation.	Start Application
Neighborhood Enhancement Grant	Select this option if you are applying to our Neighborhood Enhancement Grant Program that provides matching grants of up to \$10,000 to neighborhoods for categories including character, safety environment and more.	Start Application
Neighborhood Action Plan Grant	Select this option if you are applying to Manatee County's Neighborhood Action Plan Grant Program which provides grants of up to \$10,000 to neighborhoods that have an adopted Neighborhood Action Plan. There is no deadline to apply. The grant is open for applications until the funding is depleted for the fiscal year.	Start Application
Public Services	Select this option if you are an organization applying for funding to offer Social Services, Economic Development or Rental Assistance projects to Low- or Moderate-income residents under the CDBG or HOME programs. Click HERE to review criteria.	Start Application
Public Facilities / Improvements / Housing	Select this option if you are an organization applying for funding to offer Public Facilities, Infrastructure Improvements, Demolition of Dilapidated Structures or Housing Development projects under the CDBG or HOME programs. Click HERE to review criteria.	Start Application

Five Key Elements for Funding

- 1) Eligible Activity and Beneficiary**
- 2) Quality & Complete Application
- 3) Agency Capacity to Implement
- 4) Understanding of the Requirements
- 5) Projects Must be Results Driven



What is eligible?

- Public service projects
- Acquisition of real property
- Code Enforcement
- Public facility improvements
- Home ownership
- Housing construction or rehabilitation
- Demolition of blighted/unsafe structures
- Economic development activities
- Rental Assistance



What is not eligible?

General Rule: Any activity that is not included is excluded

- Buildings or portions thereof, used for the general conduct of government. For example, the County Administration Building
- General government expenses. Salaries for those not directly involved in programs
- Political activities
- Purchase of equipment
- Operating and maintenance expenses of agencies
- Purchase of construction equipment



National Objectives

- Activities benefiting low- and moderate-income persons (area/participant based)
- Activities which aid in the prevention or elimination of slums or blight
- Activities designed to meet community development needs having a particular urgency (i.e., natural disaster)



Low- and Moderate-Income Participant Based

- **Area Benefit:** Program is limited to a service area that has been documented to a LMI-Area by the Census
- **Income Qualify:** Program requires participants to provide source documentation to income qualify
- **Presumed Benefit:** Program is limited to only participants that are classified as LMI by HUD



Manatee County

Low & Moderate Income Areas

Low and Moderate Income Areas Percentage of Low/Mod Income Population by Block Group

- < 51%
- ≥ 51%
- Samoset West R/ECAP Target Area
- Washington Park Target Area
- Samoset Target Area
- South County R/ECAP Target Area
- Census Tracts (2010)
- Incorporated Cities
- Unincorporated Manatee County
- Water
- Interstates
- Major Roads
- Minor Roads

Source: 2010 TIGER/Line Shapefiles (Block Groups);
2021 HUD LMISD (2011-2015 ACS, Base Data)

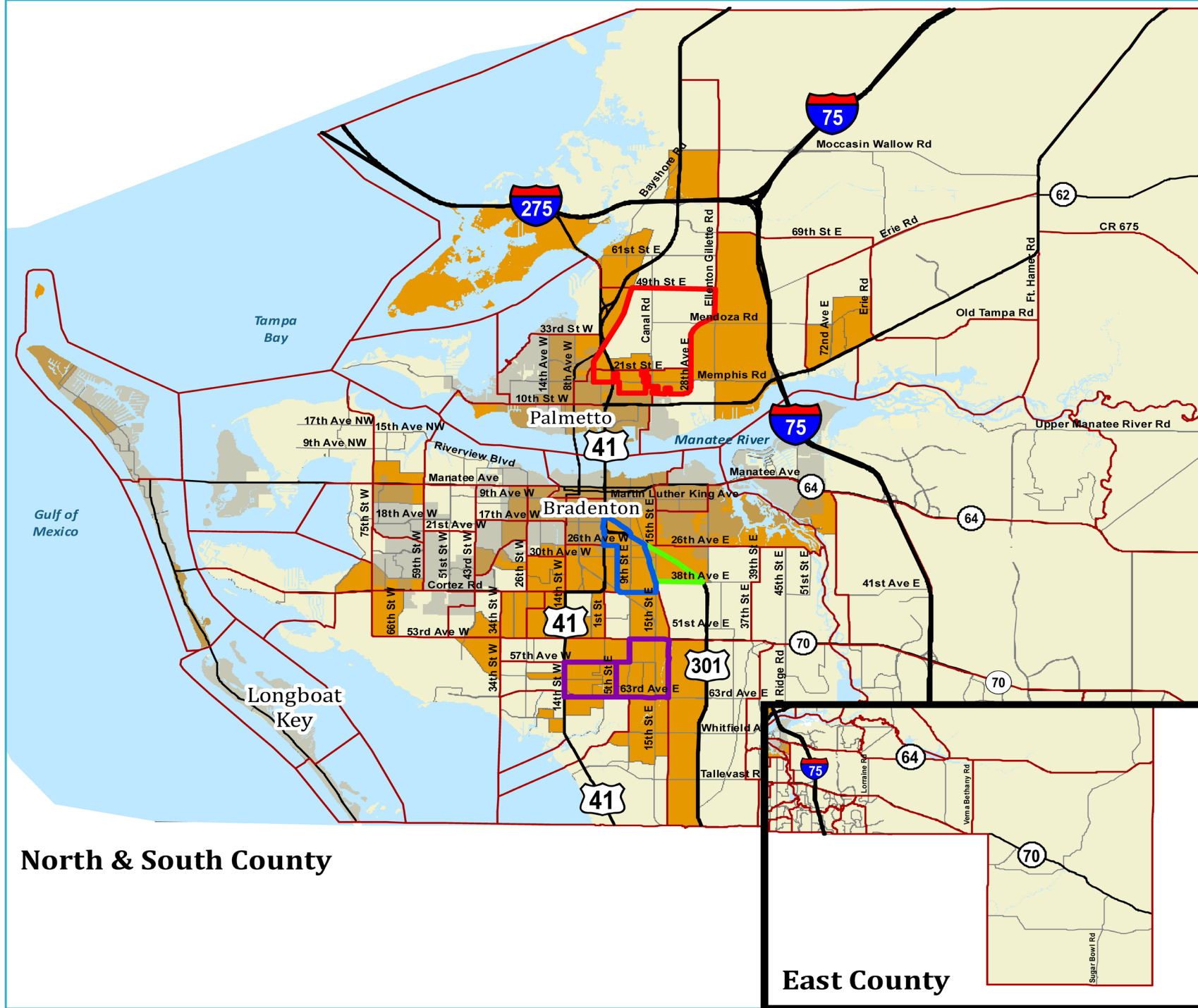
June 2022



0 1 2 Miles



One Tampa City Center
201 N. Franklin Street
Suite 1350
Tampa, FL 33602
www.WadeTrim.com



North & South County

East County

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Low- and Moderate-Income Limits

2023 Manatee County Median Income: \$98,700.00

Number in Household	1 Person	2 Person	3 Person	4 Person
30% of median	\$19,200	\$21,950	\$24,860	\$30,000
50% of median - low	\$32,000	\$36,600	\$41,150	\$45,700
80% of median - moderate	\$51,200	\$58,500	\$65,800	\$73,100
Number in Household	5 Person	6 Person	7 Person	8 Person
30% of median	\$35,140	\$40,280	\$45,420	\$50,560
50% of median - low	\$49,400	\$53,050	\$56,700	\$60,350
80% of median - moderate	\$78,950	\$84,800	\$90,650	\$96,500

Low- and Moderate-Income Participant Based

- Area Benefit: Program is limited to a service area that has been documented to a LMI-Area by the Census
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LMI Participant Based: Presumed Benefit

- All beneficiaries must be one of the pre-identified populations to use this criteria
- Abused Children
- Battered Spouses
- Severely Disabled Adults
- Homeless Persons
- Illiterate Adults
- Persons with AIDS
- Migrant Farm Workers
- Elderly 62+



Five Key Elements for Funding

- 1) Eligible Activity and Beneficiary
- 2) **Quality & Complete Application**
- 3) Agency Capacity to Implement
- 4) Understanding of the Requirements
- 5) Projects Must be Results Driven



Basic Application Requirements

- Proposed projects must demonstrate:
 - Clear and defined project narrative and results to be accomplished
 - Implementation Schedule is Realistic and Complete
 - Project Meets a Defined Need
 - Identifiable and Achievable Results
 - Specified budget to cover all costs
 - Additional funding/financing in place

IMPORTANT



New or Expanding Services/Program

- Number of beneficiaries from the entire project
- Number of beneficiaries from CDBG/HOME assistance
- Is the project New: program not previously operated
- Is the project Increasing Level of service: adding new people to an existing program/service



Financial Information & Leverage

- Budget Narrative & Budget Chart required
- List all funding sources and amount being used to implement the project
- Identify if funding source is committed or not committed
- Describe impact if less funding awarded than requested
- Project is sustainable - Not only dependent upon CDBG/HOME
- How is the requested funds leveraging additional funding
- **Projects are scored based upon % of funding requested to the total budget**



Five Key Elements for Funding

- 1) Eligible Activity and Beneficiary
- 2) Quality & Complete Application
- 3) Agency Capacity to Implement**
- 4) Understanding of the Requirements
- 5) Projects Must be Results Driven



Basic Application Requirements

- Proposed projects must demonstrate:
 - Agency capacity in place
 - Fiscal Staff experience
 - Project Manager identified
 - Non-Profit Status
 - Prior Experience with Federal Funding
 - Property
 - Correct ownership of land in place
 - Correct zoning in place

IMPORTANT



Five Key Elements for Funding

- 1) Eligible Activity and Beneficiary
- 2) Quality & Complete Application
- 3) Agency Capacity to Implement
- 4) Understanding of the Requirements**
- 5) Projects Must be Results Driven



Basic Federal Requirements

- Environmental Review (no expenses prior to being completed)
- No Supplantation of Existing Funds
- 2 CFR 200 / Financial Management
- Purchasing Standards
- Avoiding Conflicts of Interest
- Equal Opportunity
- Drug Free Workplace



More Requirements for Construction Projects...

- Davis-Bacon Labor Standards
- Section 3 Reporting (if over \$200,000 in assistance)
- Accessibility for Disabled People (services & architectural barriers)
- Lead Based Paint Abatement (if pre-1978 building)
- Capital Projects are Subject to a local Land Use Restriction Agreement



Five Key Elements for Funding

- 1) Eligible Activity and Beneficiary
- 2) Quality & Complete Application
- 3) Agency Capacity to Implement
- 4) Understanding of the Requirements
- 5) **Projects Must be Results Driven**



Activity Must be Result Driven

- How does the project or public service result in a positive effective change to the participant's condition or the community environment?
- What is the achievable outcome(s)? How will you quantify success?



Activity Must be Result Driven

- What are the Key Performance Indicators or Milestones that you will use to track progress toward the intended Goal/Result? – How do you track your progress to identify if you need to make changes?
- How will you measure the results (methodology you use?)
- Monthly & Quarterly reporting is required on the results during implementation phase



All Funding Approvals Are
Subject To Availability Of
Funding Based On The **Actual**
Allocation Received From HUD

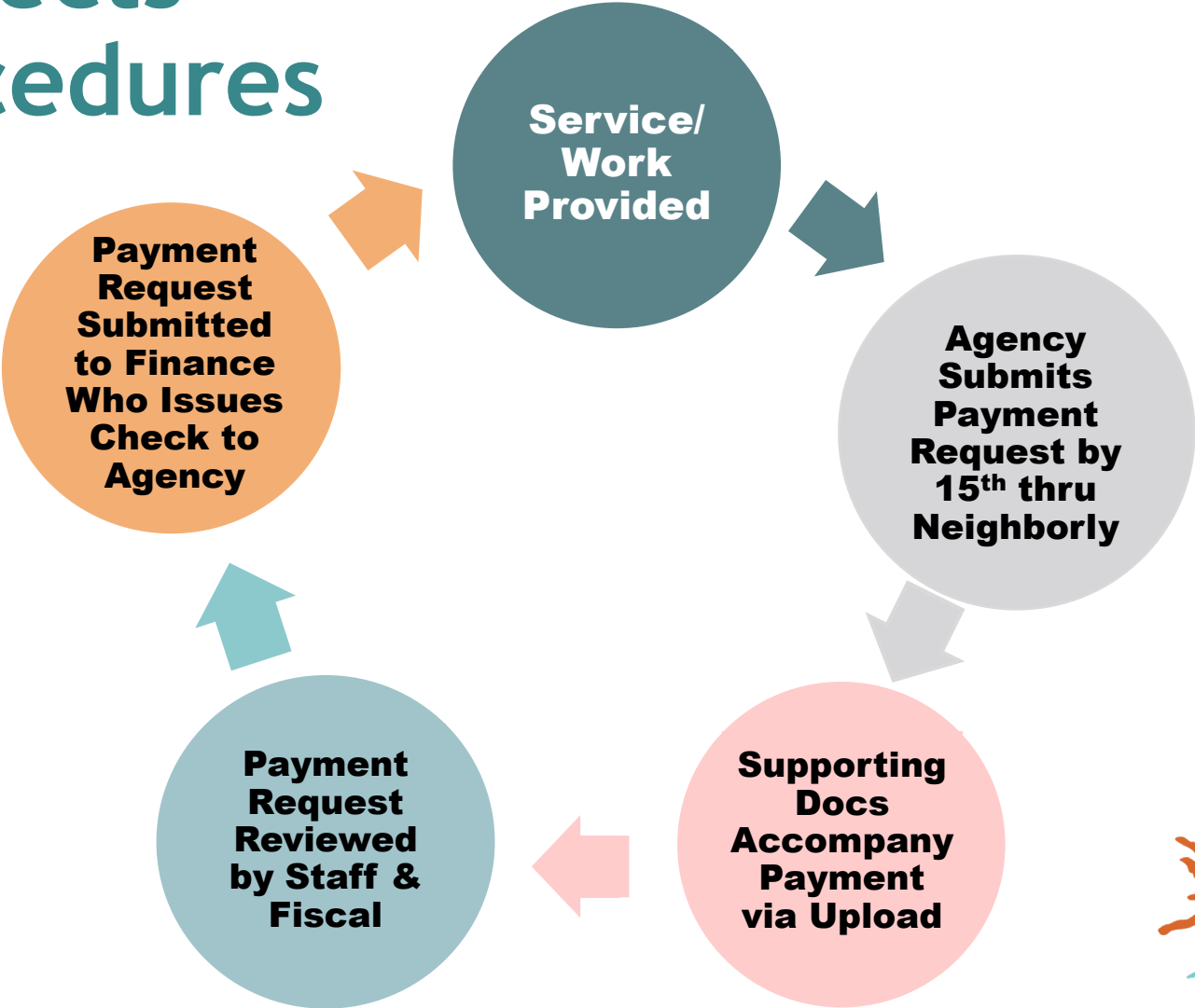


Selected Projects

- Agency meeting with Manatee Staff following notification of award to establish guidelines for reporting and compliance
- Reporting directly within Neighborly
 - Monthly Progress Reports are required with each payment request
 - Results First Quarterly Report are due at the time of submission of payment request for the appropriate quarter



Selected Projects Payment Procedures



Schedule from Application to Implementation

Date	Purpose
February 29, 2024	Grant Workshop For Applicants
February 29, 2024, 12:00 p.m.	Grant Application Opens
March 31, 2024, 11:59 p.m.	Grant Applications Due
April 1 - April 12, 2024	Staff Threshold Review Occurs
April 15 – May 3, 2024	Review Committee Application Review & Recommendation Period
June 11, 2024 (Agenda item by May 23, 2024)	BCC Meeting for Recommended Activities to include in Draft Action Plan
July 1 – July 30, 2024	Public Comment Period for Draft Consolidated and Annual Action Plan
July 30, 2024	Public Hearing and approval of 2024-2025 Annual Action Plan
August 16, 2023	Deadline for Plan submission to HUD
Oct 1, 2024 – September 30, 2025	FY 2024/25 Period of Performance

Program Year 2024/25 CDBG, HOME, CDBG-CV & HOME-ARP Application for Funding

Application Submissions Due No Later Than
11:59 p.m. – March 31, 2024

Grant Application Portal Access Opens Today
12:00 p.m. – February 29, 2024



Application Material Posting to Website

- https://www.mymanatee.org/departments/redevelopment_economic_opportunity/community_development/community_development_block_grant_c_d_b_g
- Link to Neighborly Portal to Apply
- Copy of this Presentation
- Manatee County 2024/2025 Grant Application Instruction
 - Guidance
 - Document Checklist
 - Scoring Criteria
 - CDBG Area Maps
- Neighborly User Guide





Questions
Contact Julia Vieira
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(941) 748-4501 Ext. 1266

