



**FULTON  
COUNTY**

# **2022 Annual Action Plan**

**Draft for Public Display**

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## 2022 Annual Action Plan

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## Executive Summary

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

#### 1. Introduction

Fulton County receives funding annually from the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Programs. The Department of Health & Human Services, Fulton County Department of Community Development is the County's designated department responsible for the federal grant programs. One of the requirements for receiving these funds is the development of a five-year Consolidated Plan for Housing and Community Development (CP) to provide policy direction for the next five years of funding decisions. The County prepared a new Five-Year Consolidated Plan for FY 2020-2024. The Consolidated Plan is the basis for allocation priorities and actions for FY 2022.

#### 2. Summarize the objectives and outcomes identified in the Plan

Goals were established in the Five-Year Plan to meet the identified needs as follows:

- Decent Housing Goal #1 – Affordable Housing Construction and Preservation
  - Support the development of rental housing affordable to low- and moderate-income households, including projects located near employment, transportation, and other community resources and for seniors, veterans, people with disabilities, or other special needs households, such as people who are formerly homeless or at risk of homelessness.
  - As economically feasible, consider possible opportunities to extend the useful life of existing affordable rental housing by funding acquisition and/or rehabilitation activities
  - Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
  - Increase the number of first-time homebuyers through down payment and closing cost assistance.
  - Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.
- Decent Housing Goal #2 – Down Payment Assistance
  - Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
  - Increase the number of first-time homebuyers through down payment and closing cost assistance.

- Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.
- Decent Housing Goal #3 – Homeowner Rehabilitation
  - Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs, with an emphasis on housing problems affecting health and safety.
- Decent Housing Goal #4 – Rental Assistance
  - Assist income-eligible renter households with tenant-based rental assistance.
  - Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.
  - Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.
- Decent Housing Goal #5 – Homelessness Housing and Prevention
  - Assist income-eligible renter households with tenant-based rental assistance.
  - Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.
  - Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.
- Suitable Living Environment Goal #1 – CDBG Public Services
  - Fund eligible public services to serve low- and moderate-income residents, youth, seniors, people with disabilities, and other special needs populations.
- Suitable Living Environment Goal #2 – ESG Homeless Supportive Services
  - Collaborate with agencies in the CoC and others to provide coordinated supportive services and case management to people experiencing homelessness to support moves to appropriate housing and greater stability
- Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement
  - Provide assistance to eligible households which might include but is not limited to:
    - Fair housing education services to help residents, community organizations, and housing providers understand fair housing rights and responsibilities.
    - Provide fair housing complaint investigation services.
    - Consumer education and awareness around predatory lending fraudulent mortgages, and other housing scams.
- Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
  - Work with other County departments, cooperating cities within Fulton County, and non-profit agencies.
  - Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, and community centers in income-eligible areas.

- Assist community service organizations in improving or expanding physical structures to serve homeless residents, low- and moderate-income households, and other special needs populations.
  - Demolish dilapidated structures to stop the spread of blight in low- and moderate-income areas as needed.
- Program Administration
- Program administration related to the planning and execution of community development, housing, and homelessness activities assisted with funds provided under the CDBG, HOME, and ESG programs.

### **3. Evaluation of past performance**

Each year, Fulton County reports its progress in meeting its five-year and annual goals by preparing a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is due to HUD within 90 days of the start of the new program year. The annual block grant allocation for Fulton County directly benefits Fulton County residents who reside in Fulton County but outside the jurisdictional boundaries of the Cities of Atlanta, John's Creek, Roswell and Sandy Springs. Specific cities in Fulton County that partnered through a Cooperative Agreement for the Urban Entitlement resources are the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City.

The CAPER for 2021 will be produced and available for public display in early March 2022. During FY 2020, the County managed the three federal grant programs: CDBG, HOME and ESG. CDBG successfully contributed to the completion of projects to include parks and recreational developments, storm drainage and sewer system improvements, street and sidewalk improvements, community meeting facilities improvements, and handicap accessible facilities. During FY 2020, the County managed CARES Act funds through CDBG-CV and ESG-CV.

In 2020, the CDBG program served 277 individuals or households. Note: Housing rehabilitation is reported by household and there were 30 households served. The CDBG program is designed to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low to moderate income persons. Funds were used for municipal infrastructure and facilities projects.

HOME funds were allocated to homeownership opportunities, as well as Tenant Based Rental Assistance.

In 2020, there were 758 individuals served. In addition to what is reported in the table above, there were 6 persons who identified as multi-racial and was not recorded for 41 persons. Hispanic ethnicity was not counted for 10 persons served in ESG funded programs. Fulton County provided the funding for services to female homeless heads of household with children, families, unattached women and men, and youth through North Fulton Community Charities, Inc. from the period from January 1, 2020- December 31, 2020.

During this period Fulton County also received CARES Act assistance for CDBG and ESG and worked to develop a comprehensive community response. CDBG funds were allocated to several municipalities to

undertake a variety of activities that prevent, prepare for, and respond to coronavirus. ESG funds were used to support the homeless shelters and outreach efforts, provide for rapid re-housing, and homeless prevention.

Copies of recent CAPERs are available for review at Fulton County's Community Development Department or online at [www.fultoncountyga.gov/services/human-services/housing-and-urban-development-funded-programs](http://www.fultoncountyga.gov/services/human-services/housing-and-urban-development-funded-programs).

#### **4. Summary of Citizen Participation Process and consultation process**

Fulton County consulted with residents, County staff, government agencies, nonprofit agencies, housing and homeless service providers, and others to develop this Annual Action Plan (AAP). The County held two public meetings on September 23, 2021 and January 6, 2022 and interviewed key stakeholders to develop its strategy for 2022. Applications were solicited from local municipalities for CDBG funds and from ESG service providers. HOME funds were allocated to an on-going homeownership program and Tenant-Based Rental Assistance.

Fulton County held two virtual meetings to receive stakeholder input on the draft plan. The first meeting was held to receive Citizen input on the needs of the County that could be met with federal grant funds and to provide a summary of the past use of funds. The second public hearing was held to provide an opportunity for the public to comment on the draft Annual Action Plan. The 30-day public comment period ran from December 8, 2021 to January 10, 2022.

On February 3, 2021, HUD issued a waiver allowing public hearings to be held virtually to allow for social distancing and limited public gatherings during a public health emergency. The County revised its Citizen Participation Plan to allow for virtual public meetings during public health emergencies. The County is continuing to follow local, state and federal recommendations to limit public gatherings during the COVID-19 public health emergency. As such, the County is utilizing the waiver during the development of its 2022 AAP and will solicit public comment and conduct public hearings in a virtual way in accordance with its Citizen Participation Plan. Accommodations will be made for persons with disabilities and LEP persons. Documents for public review will be shared via the County's Website.

#### **5. Summary of public comments**

Fulton County held a public needs meeting on September 23, 2021 and second public hearing on January 6, 2022.

[additional information will be added after the 2<sup>nd</sup> public hearing]

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

All comments were accepted.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

Lead Agency	Fulton County	Department of Community Development
CDBG Administrator	Fulton County	Department of Community Development
HOME Administrator	Fulton County	Department of Community Development
ESG Administrator	Fulton County	Department of Community Development

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The Fulton County Department of Community Development provides oversight, management, and administration of projects, programs, and initiatives as shown with the Annual Action Plan. The Department of Community Development is responsible for all documentation, administrative, and compliance requirements of the HUD-funded programs that the County administers, including the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG) programs.

The County works actively to establish and support relationships with other County departments, federal and state agencies, local governments, nonprofit organizations, and private sector partners to identify affordable housing, community development, and supportive service needs in Fulton County and develop strategies to meet these needs with combined resources. Multiple Fulton County departments, nonprofit organizations, and municipalities in Fulton County (Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City, as of current cooperative agreements) are primarily responsible for implementing programs and services covered by the Consolidated Plan under supervision of the Department of Community Development.

## **Consolidated Plan Public Contact Information**

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

### **1. Introduction**

Fulton County conducted a variety of public outreach to gather input from County and City staff, government agencies, nonprofit agencies, affordable housing developers, local service providers, and county residents in preparing this plan. The County held two public meetings open to the public; and interviewed a variety of nonprofit staff and Continuum of Care members, Health and Human Services Department staff, and queried cooperating cities regarding anticipated capital projects.

### **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))**

Fulton County works closely with public and private sector providers to ensure delivery of services to residents and to promote interagency communication and planning. The County has representatives on many non-profit agency boards and/or advisory committees. The County works with various housing, health, mental health, and service agencies to gather data and identify gaps in services.

In developing the Consolidated Plan in 2020 and the 2022 Annual Plan, the County strived to include input from housing providers and health, mental health, and other service agencies. A variety of assisted housing providers and health, mental health, and service agency stakeholders were invited to attend the public meeting held September 23, 2021. Stakeholders included city elected officials and staff, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, agencies serving people with disabilities, an agency representing persons with limited English-speaking ability, senior services, workforce development organizations, and others. The public meetings and interviews included discussions of the connections between housing and other community needs. Office hours were also held for interested municipalities and organizations to review CDBG and ESG specific requirements and answer questions on the application process.

### **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.**

Fulton County falls within the Fulton County Georgia-502 Homeless Continuum of Care (CoC), which was formed to provide a more focused approach to issues of homelessness within the County. The CoC was formed in 2014 to carry out the planning responsibilities for homeless people within the political boundaries of Fulton County. It coordinates housing, services, and funding streams; promotes community-wide commitment to goals of ending homelessness; analyzes homeless needs in the county; and coordinates the housing and services systems to align resources & functions.

From a regional perspective, the County collaborates with the State of Georgia, City of Atlanta, and DeKalb County to facilitate service coordination, client referrals and the collection of data through a shared Homeless Management Information System (HMIS).

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

The Emergency Solutions Grant Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The program focuses on assisting people to regain stability and move to permanent housing.

To assist in determining how to allocate ESG funds, Fulton County held several community meetings throughout the year as Covid funding continued to be assessed and spoke with stakeholders to identify priority and evolving needs. Stakeholders include emergency, transitional, and supportive housing providers; service providers and community organizations; and local government agencies.

During the October CoC Membership Meeting, the County reviewed the 2022 Annual Action Plan including an overview of the Consolidated Plan goals, projected 2022 allocations, basics of CDBG, HOME and ESG and past use of funds.

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

Representative agencies, groups, and organization that were contacted during the year and specifically for the 2022 Annual Action Plan are shown in the table on the following pages. In addition to the agencies listed, others may have participated in public meetings, CoC meetings or Office Hours.

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	ATLANTA LEGAL AID
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a subrecipient, Atlanta Legal Aid provides fair housing outreach and education.
2	<b>Agency/Group/Organization</b>	City of College Park
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis non-housing improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	College Park is a subrecipient of funding.
3	<b>Agency/Group/Organization</b>	CITY OF EAST POINT
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of East Point is a subrecipient of funding.

4	<b>Agency/Group/Organization</b>	CITY OF HAPEVILLE
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis non-housing improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Hapeville is a subrecipient of funding.
5	<b>Agency/Group/Organization</b>	City of Fairburn Georgia
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs non-housing improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Fairburn will be a subrecipient of funds of CDBG funds.
6	<b>Agency/Group/Organization</b>	CITY OF UNION CITY
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	non-housing needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Union City will be a subrecipient of funds for 2022 CDBG.
7	<b>Agency/Group/Organization</b>	CITY OF PALMETTO
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	non-housing needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Palmetto will be a subrecipient of funds for 2021 CDBG. A park will be improved.
8	<b>Agency/Group/Organization</b>	Fulton County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Fulton County Housing authority provides services to those households in lowest income brackets. The HAFC provides counseling for homeownership and self-sufficiency.
9	<b>Agency/Group/Organization</b>	Housing Authority of the City of East Point
	<b>Agency/Group/Organization Type</b>	PHA Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	East Point Housing Authority offers Self-Sufficiency educational programming to residents and has recently developed a new Senior housing opportunity.
10	<b>Agency/Group/Organization</b>	Community Assistance Center
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Community Assistance Center provides homeless prevention services for persons threatened with homelessness.
11	<b>Agency/Group/Organization</b>	FULTON COUNTY HEALTH & HUMAN SERVICES DEPARTMENT
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-Health Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Fulton County Department of Health and Human Services provides oversight to the COC and homeless services for the County, including the ESG Program.

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

There are no agency types that were not consulted in preparation of the annual plan.

**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	Fulton County	Continuum of Care members assist with emergency shelter, transitional housing, homelessness prevention, and outreach and supportive services, which align with goals and priorities identified in the Strategic Plan.
Fulton County Strategic Plan (2020-2024)	Fulton County Office of Strategy and Performance Management	<p>Goals identified in the Comprehensive Plan which align with those of the Strategic Plan include:</p> <ul style="list-style-type: none"> <li>• Improve the quality, quantity, and accessibility of housing stock across the County.</li> <li>• Develop a sense of community and independence among seniors and intellectually and developmentally disabled (IDD) persons by providing an affordable, safe space to receive care.</li> <li>• Ensure that the county-wide workforce has the skills needed to meet business demand and opportunities to overcome hiring barriers.</li> <li>• Expand the County’s economic development impact by pursuing opportunities that link to regional economic development efforts, target areas with the greatest need, and increase return on investment.</li> <li>• Deliver high quality cultural and recreation services through County facilities.</li> <li>• Increase access to arts and culture services across the county by funding organizations key to the county’s cultural ecosystem.</li> <li>• Ensure that Fulton County residents live in the healthiest environment possible.</li> </ul>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fulton County Comprehensive Plan (2016-2035)	Fulton County Department of Planning and Community Services	<p>Goals identified in the Comprehensive Plan which align with those of the Strategic Plan include: Senior housing options should expand as the population continues to grow.</p> <ul style="list-style-type: none"> <li>• Make Aging in Place a more achievable reality by aligning with the goals and policies of the Atlanta Regional Commission’s Aging-in-Place initiative.</li> <li>• Encourage a wide variety of housing types to accommodate a range of income levels for current and future residents.</li> <li>• Promote appropriate infill housing and development through planning, infrastructure placement, and regulations.</li> <li>• Encourage development that promotes open space, walking paths and bicycle lanes as a means to connectivity and neighborhood cohesiveness.</li> <li>• Review current land use development patterns that may cause difficulties in the creation of walkable/bikeable communities and MARTA transit opportunities by encouraging wider sidewalks and pedestrian amenities.</li> <li>• Seek transportation enhancements (highway, transit, bicycle, and pedestrian) to compliment and align with land use efforts.</li> <li>• Plan and design multi-use trails and/or sidewalks during the development or renovation of any Fulton County facility.</li> <li>• Encourage cooperative efforts between the city, county and school district to provide adequate facilities for community activities and needs (i.e. senior and youth centers).</li> </ul>



Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fulton County Homeless Plan Strategy	Fulton County Homeless Programs Division	<p>Goals identified in the Draft Homeless Plan Strategy which align with those of the Strategic Plan include:</p> <ul style="list-style-type: none"> <li>• Expand Housing Resources: <ul style="list-style-type: none"> <li>○ Expand the inventory of low-income housing in both non-profit and for-profit sectors and grow the sources of available funding.</li> <li>○ Develop goals in partnership with the Fulton County's Departments and programs that provide services to the homeless population to include sub-goals for each homeless sub-population, including single adults, families with children, and units for youth.</li> </ul> </li> <li>• Standardize Best Practices: Establishment of system-wide basic standards for all county funded service providers to increase housing placement and reduce reentry to homelessness.</li> <li>• County Homeless Housing Policy: Build a cohesive, county policy framework via zoning, development and related policy areas to create a unified and effective approach to include: Increased Housing Densities; Review of County Housing Development Standards; Integration of local municipality planning processes; and, Exploration of local municipality resources.</li> </ul>

**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(l)).**

During FY 2022, the County will continue to work with other local public and private entities, regional organizations, and the state of Georgia. Several public entities provided input during the development of this Plan, including the Atlanta Regional Commission, Fulton County Department of Community Development, Fulton County Continuum of Care, the Housing Authority of Fulton County, Fulton County Schools, the Fulton County Development Authority, and the East Point and Fairburn Housing Authorities, the Cities of Alpharetta, East Point, College Park, Fairburn, Hapeville, Milton, Mountain Park, Union City and Palmetto.

## **AP-12 Participation – 91.105, 91.200(c)**

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

Fulton County's Citizen Participation Plan provides the steps to be taken to ensure that the public and stakeholders in the federal grant programs have a say in the development of the Action Plan. This process includes outreach to municipalities and organizations. Such outreach included:

1. Informing the municipalities and organizations of the availability of funds, application deadline. Letters and emails were sent out in August 2021.
2. The first public meeting was held on September 23, 2021. The hearing was advertised in the local newspaper and a blast emailed to a cross section of organizations, municipalities, state agencies, as well as advocacy organizations focused on fair housing, and language barriers to inform them of the hearing.
3. A series of Office Hours were held for CDBG and ESG applicants to review program eligibility and provide overview of the application process.
4. The Action Plan was disseminated by email to the participating jurisdictions as well as organizations that represent low- and moderate-income persons and those with limited English proficiency. The second public hearing announcement was included in this communication.
5. The plan was available for public comment for 30 days and available on the county website.
6. A second hearing will be held on January 6, 2022 and advertised with the availability of the Action Plan for display. Notice will be disseminated through agencies that have contact with low- and moderate-income persons and those with limited English proficiency.
7. Comments received were provided during the public hearing during which participants indicated [complete after 2<sup>nd</sup> public hearing]

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Needs Hearing	General Public	Zero people attended the 1 <sup>st</sup> Public Needs Hearing	None	None	N/A
2	Newspaper Ads	General Public	The newspaper ads were used to inform the public of the first and second public hearings as well as the availability of the plan.	N/A	None	N/A
3	Public Hearing	General Public	[TBD] January 6, 2022			N/A
4	Letters /Emails	Municipalities and Agencies	Sent to inform entities of process and encourage participation by constituent groups	TBD	None	N/A

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The table below shows the County's grant allocations for the 2022 program year as announced by HUD, along an estimate of anticipated grant funding for the remaining years covered by this Consolidated Plan. This estimate assumes that funding over the remaining years will average to be about the same as the 2020 allocations upon which this project was based. All grant funds will be used to support the Fulton County Department of Community Development's goals to provide decent affordable housing, a suitable living environment, and expanded economic development.

HOME Program income reflects the actual amount of prior year program income available for use in 2022.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin and planning Economic development Housing Public improvements Public services	\$1,400,000	\$0	\$301,274.45	\$1,701,274.45	\$4,200,000	CDBG funds may be used to carry out activities related to housing rehabilitation, demolition and community revitalization, public infrastructure improvements, park improvements, public services, and planning.
HOME	Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$670,081	\$5,074.12	\$0	\$675,155.12	\$2,020,243	HOME funds may be used for homebuyer assistance, TBRA, homeowner rehab, affordable housing development, CHDO activities, and program administration.
ESG	Federal	Conversion and rehab for transitional housing Financial assistance Overnight shelter Rapid re-housing Rental assistance services Transitional housing	\$159,268	\$0	\$0	\$159,268	\$477,804	ESG funds may be used for homeless prevention, rapid rehousing, emergency shelter and services, street outreach, HMIS, and program administration.

**Table 5 - Expected Resources – Priority Table**

**Fulton County will use federal funds to leverage additional private, state, and local funds where applicable. Fulton County funding serves as gap financing for housing development projects, which typically also include a combination of private and other public funds.**

There are no CDBG Matching funds requirements. Communities are encouraged to use CDBG funds to leverage local funds to undertake projects of local significance.

HOME requires a matching fund contribution of 25% as outlined in 24 CFR 92.218. These are anticipated to be satisfied through a mix of match carryover from prior years as interest foregone as a result of homeowners received below market rate loans with HOP assistance. The County provides matching funds of twenty-five cents from the County's General Fund for each HOME dollar expended.

The Emergency Solutions Grant (ESG) program requires a 100% match which will also be met using County General Funds. The County funds activities that serve persons experiencing homelessness through the CSP program.

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

CDBG funding will be used to develop public facilities for public purposes using existing owned properties to include parks, recreational facilities, and community centers in low- and moderate-income areas of the County. Sidewalks, including accessibility improvements for sidewalks and curbs, may be installed or replaced in these areas, especially in locations with high pedestrian use such as routes commonly used by school children or people walking to public transportation and shopping. Funds will also be used of infrastructure projects including sewer improvements and pump station upgrades.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Decent Housing Goal #1 – Affordable Housing Construction and Preservation	2022	2023	Affordable Housing	County Wide	Develop and Preserve Affordable Rental Housing	HOME: \$100,512	Rental Units Constructed: 2 housing units
2	Decent Housing Goal #2 – Down Payment Assistance	2022	2023	Affordable Housing	County Wide	Affordable Homeownership Opportunities	HOME: \$125,000.00	Direct Financial Assistance to Homebuyers: 3 households



3	Decent Housing Goal #4 – Rental Assistance	2022	2023	Affordable Housing	County Wide	Develop and Preserve Affordable Rental Housing	HOME: \$377,561.00	Tenant-based rental assistance/Rapid Rehousing: 25 households
4	Decent Housing Goal #5 – Homelessness Housing and Prevention	2022	2023	Homeless	County Wide	Rental Assistance, Homelessness Prevention, and Rapid Rehousing	ESG: \$63,707	Tenant-based rental assistance/Rapid Rehousing: 20 households
5	Suitable Living Environment Goal #2 – ESG Homeless Supportive Services	2022	2023	Homeless	County Wide	Supportive Services for Homeless Individuals and Families	ESG: \$83,616	Homeless Person Overnight Shelter: 399 persons
6	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement	2022	2023	Non-Housing Community Development	County Wide	Fair Housing Education and Enforcement	CDBG: \$77,874	Public Services activities for Low/Moderate Income Housing Benefit: 30 households

7	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements	2022	2023	Non-Housing Community Development	County Wide	Community Improvements	CDBG: \$1,343,400	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 90,186 persons
8	Program Administration	2022	2023	Other	County Wide	Program Administration	CDBG: \$280,000  HOME: \$67,008.00  ESG: \$11,945.10	Other: 3

Table 6 – Goals Summary

## Goal Descriptions

- Decent Housing Goal #1 – Affordable Housing Construction and Preservation
  - Support the development of rental housing affordable to low- and moderate-income households, including projects located near employment, transportation, and other community resources and for seniors, veterans, people with disabilities, or other special needs households, such as people who are formerly homeless or at risk of homelessness.
  - As economically feasible, consider possible opportunities to extend the useful life of existing affordable rental housing by funding acquisition and/or rehabilitation activities
  - Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
  - Increase the number of first-time homebuyers through down payment and closing cost assistance.
  - Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.
- Decent Housing Goal #2 – Down Payment Assistance
  - Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
  - Increase the number of first-time homebuyers through down payment and closing cost assistance.
  - Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.
- Decent Housing Goal #3 – Homeowner Rehabilitation
  - Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs, with an emphasis on housing problems affecting health and safety.
- Decent Housing Goal #4 – Rental Assistance
  - Assist income-eligible renter households with tenant-based rental assistance.
  - Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.
  - Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.
- Decent Housing Goal #5 – Homelessness Housing and Prevention
  - Assist income-eligible renter households with tenant-based rental assistance.
  - Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.

- Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.
- Suitable Living Environment Goal #1 – CDBG Public Services
  - Fund eligible public services to serve low- and moderate-income residents youth, seniors, people with disabilities and other special needs populations
- Suitable Living Environment Goal #2 – ESG Homeless Supportive Services
  - Collaborate with agencies in the CoC and others to provide coordinated supportive services and case management to people experiencing homelessness to support moves to appropriate housing and greater stability
- Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement
  - Provide assistance to eligible households which might include but is not limited to:
    - Fair housing education services to help residents, community organizations, and housing providers understand fair housing rights and responsibilities.
    - Provide fair housing complaint investigation services.
    - Consumer education and awareness around predatory lending fraudulent mortgages, and other housing scams.
- Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
  - Work with other County departments, cooperating cities within Fulton County, and non-profit agencies.
  - Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, and community centers in income-eligible areas.
  - Assist community service organizations in improving or expanding physical structures to serve homeless residents, low- and moderate-income households, and other special needs populations.
  - Demolish dilapidated structures to stop the spread of blight in low- and moderate-income areas as needed.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

Housing assistance will be provided through several programs to different population groups:

	Extremely low	Low income	Moderate Income
Homeownership		1	2
Housing Rehabilitation	2	4	4
TBRA	25		
Rapid Rehousing	20		

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The projects listed below represent the activities Fulton County plans to undertake during the 2022 program year to address the goals of providing decent affordable housing, promoting a suitable living environment, and encouraging economic opportunity. The allocation of funding for the 2022 projects has been determined based on overall priority needs of county residents and community input received during the planning process.

### Projects

#	Project Name
1	2022 ESG Activities
2	2022 Home Ownership Program
3	2022 Tenant-Based Rental Assistance
4	2022 HOME CHDO
5	2022 HOME Program Administration
6	Hapeville – Tom E. Morris Splash Park
7	City of Fairburn—Golightly Street Improvements
8	Union City—Roosevelt Highway improvements
9	Palmetto—Green Springs and Palmetto Springs Pump Station upgrades
10	East Point- Summer Park
11	East Point- Brookdale Park
12	East Point- Point Center Park
13	College Park-- Conley Recreation Center-Plumbing, Sewer Infrastructure Improvement
14	2022 CDBG Program Administration
15	2022 Fair Housing Activities

**Table 7 - Project Information**

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

In allocating funding, Fulton County prioritized affordable housing, fair housing, homelessness, and community revitalization (including facility, park, and infrastructure improvements), which emerged as critical needs during the Consolidated Planning process. Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County’s programs are designed to serve eligible individuals and households throughout the County’s service area.

Obstacles to meeting underserved needs include limited funding availability, limited affordable housing development opportunities and shovel-ready projects, and increased development costs.

The funding amounts proposed below represent estimated amounts based on what the County expects to receive from HUD. The final project budgets will be determined upon Congressional budget appropriations and the County's actual allocation amount. Should the County receive more than projected, the County will adjust this budget by increasing administration to the maximum 20% allowed; then, each project will receive additional funds commensurate with the increase in the County's allocation (for instance, if the County's allocation increases by 3%, each project will receive an increase of 3%). If the County receives less than these estimates, project budgets will be reduced according to the methodology above.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	<b>H-ESG Activities</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Decent Housing Goal #5 – Homelessness Housing and Prevention Suitable Living Environment Goal #2 – ESG Homeless Supportive Services Program Administration
	<b>Needs Addressed</b>	Rental Assistance, Homelessness Prevention, and Rapid Rehousing Supportive Services for Homeless Individuals and Families Program Administration
	<b>Funding</b>	ESG: \$159,268
	<b>Description</b>	ESG funding will be used to provide emergency shelter operations and services; HMIS support; homelessness prevention (20%), rapid rehousing (20%); street outreach (38%); emergency shelter (20%); and program administration (2%).
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Homeless person overnight shelter: 399 people assisted Homelessness prevention/rapid rehousing: 1,016 people assisted
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Eligible ESG activities, including emergency shelter operations and services, homelessness prevention, rapid rehousing, street outreach, HMIS support, and program administration by Fulton County Department of Community Development staff.
2	<b>Project Name</b>	<b>2022 Home Ownership Program</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Decent Housing Goal #2 – Down Payment Assistance
	<b>Needs Addressed</b>	Affordable Homeownership Opportunities
	<b>Funding</b>	HOME: \$125,000
	<b>Description</b>	Loans to eligible first time homebuyers to assist with down payment costs related to eligible home purchases in Fulton County.
	<b>Target Date</b>	12/31/2022

	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Direct financial assistance to homebuyers: 3 households assisted
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Down payment assistance to first time homebuyers.
<b>3</b>	<b>Project Name</b>	<b>2022 Tenant-Based Rental Assistance</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Decent Housing Goal #4 – Rental Assistance
	<b>Needs Addressed</b>	Rental Assistance, Homelessness Prevention, and Rapid Rehousing
	<b>Funding</b>	HOME: \$377,561.00
	<b>Description</b>	Reimbursement to contracted partner(s) to provide tenant-based rental assistance programs for extremely low- and low-income households.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Tenant based rental assistance / rapid rehousing: 25 households assisted
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Tenant-based rental assistance for extremely low- and low-income households.
<b>4</b>	<b>Project Name</b>	<b>2022 HOME Program CHDO</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Decent Housing Goal #1 – Affordable Housing Construction and Preservation
	<b>Needs Addressed</b>	Develop and Preserve Affordable Rental Housing
	<b>Funding</b>	HOME: \$100,512
	<b>Description</b>	Set aside funds for CHDO activities.
	<b>Target Date</b>	12/31/2022



	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Rental Units Constructed; 2 units
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	CHDO eligible activities
<b>5</b>	<b>Project Name</b>	<b>2021 HOME Program Administration</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$ 67,008
	<b>Description</b>	Program administration costs related to the overall planning and execution of HOME-assisted affordable housing activities, in accordance with the HOME administrative cap. Up to 10 percent of each year's HOME grant plus program income can be obligated for planning and administrative costs.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	0
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Program administration costs related to the overall planning and execution of HOME-assisted affordable housing activities.

<b>6</b>	<b>Project Name</b>	<b>Hapeville – Tom E. Morris Splash Park</b>
	<b>Target Area</b>	City of Hapeville
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Development of a Splash Pad in the park for citywide use; this is the third year of funding for this multi-year project.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	The population of CT 108 block groups 1-6, 6,645 persons
	<b>Location Description</b>	532-500 Marina St
	<b>Planned Activities</b>	Park improvements Matrix Code 03F
<b>7</b>	<b>Project Name</b>	<b>City of Fairburn – Golightly Street Improvements</b>
	<b>Target Area</b>	City of Fairburn
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$315,000
	<b>Description</b>	New sidewalks with installation of curb ramps at the intersections and pedestrian lighting Matrix Code 03L
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Survey conducted: 161 people
	<b>Location Description</b>	140 Golightly Street
	<b>Planned Activities</b>	Sidewalk improvements
<b>8</b>	<b>Project Name</b>	<b>Union City – Roosevelt Highway Improvement</b>

	<b>Target Area</b>	City of Union City
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$252,950
	<b>Description</b>	The Roosevelt Highway streetscape improvements project includes the portion of Highway 29 from Highway 138 to Dixie Lake Road. The project will provide ADA accessible sidewalk upgrades, landscaping, hardscaping and lighting. The streetscape improvements support the City’s efforts to improve safety and quality of life.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	19,665 persons in CTs 105.12-105.13
	<b>Location Description</b>	Downtown Union City
	<b>Planned Activities</b>	Street improvements Matrix Code 03L
9	<b>Project Name</b>	<b>Palmetto-Green Springs and Palmetto Springs Pump Station upgrades</b>
	<b>Target Area</b>	City of Palmetto
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$242,950
	<b>Description</b>	Improvement to pump stations including electrical and increasing capacity
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	CT 104 BG 3 population 3,885
	<b>Location Description</b>	Green Springs and Palmetto Springs
	<b>Planned Activities</b>	Infrastructure Improvement Matrix Code 03J
10	<b>Project Name</b>	<b>East Point- Summer Park</b>

	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$80,000
	<b>Description</b>	Park improvements including rehabilitation of the pedestrian bridge spanning a stream.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	All CT and BG in East Pont: 46,375 people
	<b>Location Description</b>	Sumner Park 1889 Lexington Ave, East Point, GA 30344
	<b>Planned Activities</b>	Park improvements Matrix Code 03F
<b>11</b>	<b>Project Name</b>	<b>East Point- Brookdale Park</b>
	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	Park improvements including resurfacing tennis courts
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	CTs 110, 111 and 123 6,035 people
	<b>Location Description</b>	Brookdale Park 961 Parkside Terrace East Point Ga 30344
	<b>Planned Activities</b>	Park improvements Matrix Code 03F
<b>12</b>	<b>Project Name</b>	<b>East Point-Point Center Park</b>

	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	Park improvements including will replace unsafe, worn and torn equipment with more functioning equipment to provide a safe fun area for kids and families to play.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	CT 112.02: 1465 people
	<b>Location Description</b>	Center Park 3000 Pearl St East Point, Ga 30344
	<b>Planned Activities</b>	Park improvements Matrix Code 03F
<b>13</b>	<b>Project Name</b>	<b>College Park-- Conley Recreation Center-Plumbing, Sewer Infrastructure Improvement</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$162,500
	<b>Description</b>	The Hugh Conley Center provides youth athletic programs. The project will address the waste plumbing and sewer infrastructure in the 60-year old facility.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	CT 106.01 (1-4), 106.03 (1-3), 106.04 (BG 1 and 3) and CT 123 (1-2): 11,955 people
	<b>Location Description</b>	3636 College Street College Park GA 30337
	<b>Planned Activities</b>	Sewer improvements Matrix Code 03E
<b>14</b>	<b>Project Name</b>	<b>2022 CDBG Program Administration</b>

	<b>Target Area</b>	Countywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$280,000
	<b>Description</b>	Program administration costs related to the overall planning and execution of CDBG-assisted community development activities, in accordance with the CDBG administrative cap. Up to 20 percent of each year's CDBG grant plus program income can be obligated for planning and administrative costs.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Not Applicable
	<b>Location Description</b>	Fulton County Department of Community Development, 137 Peachtree Street SW, Atlanta, Georgia 30303
	<b>Planned Activities</b>	Costs related to overall planning and execution of CDBG-assisted activities.
15	<b>Project Name</b>	<b>Fair Housing Activities</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement
	<b>Needs Addressed</b>	Fair Housing Education and Enforcement
	<b>Funding</b>	CDBG: \$77,874
	<b>Description</b>	Fair Housing education services for residents, community organizations, and housing providers. Fair Housing complaint investigation services.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Fair housing activities to benefit approximately 30 low/moderate income residents
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Fair housing education.

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

In allocating funding, Fulton County prioritized affordable housing, homelessness, public services, and community revitalization (including facility, park, and infrastructure improvements), which emerged as critical needs during the Consolidated Planning process. Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County's programs are designed to serve eligible individuals and households throughout the County's service area.

Obstacles to meeting underserved needs include limited funding availability, limited affordable housing development opportunities and shovel-ready projects, and increased development costs.

## **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**

The Fulton County entitlement jurisdiction covers unincorporated Fulton County, as well as the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City, who executed a cooperation agreement with Fulton County during urban county requalification process. The cities of Atlanta, Roswell, and Sandy Springs and South Fulton do not participate with Fulton County and receive their own HUD grant allocations.

Geographically, the Fulton County entitlement jurisdiction is divided into disparate north and south portions by the cities of Atlanta, Roswell, and Sandy Springs, which lie in middle of the county. While HUD-funded activities that qualify on an area basis may be located in any income-eligible areas with the entitlement jurisdiction, all of Fulton County’s low- and moderate-income census tracts are located in southern Fulton County. Thus, CDBG-funded public facility and infrastructure improvements completed over the next five years will be targeted to the southern portion of Fulton County, unless they serve a population that is specifically eligible for assistance (e.g., seniors, people with disabilities, victims of domestic violence).

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Countywide	100%

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County’s programs are designed to serve low- and moderate-income individuals and households throughout the County’s service area.

The County chooses not to designate specific geographic target areas so that it may concentrate on priority need for services and improvements based on eligibility, availability of funds, and readiness to proceed.



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

During the 2022 program year, Fulton County will assist 57 households with housing needs. Through ESG, the County will fund homelessness prevention/rapid rehousing for 20 households. Using HOME funds, the County anticipates providing tenant-based rental assistance to 25 households and assisting 3 homebuyers purchase homes and with CDBG funds 10 homeowner units will be rehabilitated.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	20
Non-Homeless	37
Special-Needs	0
Total	57

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	45
The Production of New Units	2
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	57

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

#### Discussion

The above goals are based on the accomplishment goals set in the Projects section AP 35.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of Fulton County (HAFC) operates Public Housing and Housing Choice Voucher programs in Fulton County. As of 2020, the HAFC operates or assists 1,958 total units of affordable housing. 960 assisted families utilize housing choice vouchers, 132 units are Low Income Housing Tax Credits, 212 units are project-based vouchers (of which 100 resulted from a RAD conversion), and 654 are port vouchers.

The Housing Authority of the City of East Point (EPHA) operates two public housing developments, 35 units at Hurd Homes, and 150 units at Martel Homeless. In addition, the authority subsidizes 12 public housing units as part of the Norman Berry Village development, which managed along with the rest of the development by Northsouth.

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

The goal of the HAFC is to provide decent, safe, and sanitary rental housing for eligible families, to provide opportunities, promote self-sufficiency and economic independence for Housing Choice Voucher (HCV) participants. The Mission Statement is "To provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency and community revitalization." HAFC has partnered in six Low-Income Housing Tax Credits (LIHTC) developments, owned, and managed by private entities, with Phase II of the newest development underway. HAFC continues to seek development partners, HUD funding, LIHTC, and other non-federal sources to develop affordable housing construction or rehabilitation.

The HAFC has converted all public housing units in its portfolio to other forms of publicly supported housing other than Sterling Place Apartments located at 144 Allen Road, Sandy Springs, Georgia. The "Partnership Properties" include:

- Arcadia at Parkway Village
- Woodbridge at Parkway Village
- Providence at Parkway Village
- Legacy at Walton Lakes

The EPHA added 180 units of senior housing in the summer of 2020 at Hillcrest Active Adult Community. The second phase of the project is scheduled to being construction in 2022 with a plan for an additional 160 units.

The Nelms House development has been selected by the Georgia Department of Community Affairs as an approved applicant for a 4% Tax Credit development. The plan is to redevelop the site into approximately 88 affordable multi-family units.

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

H AFC residents have several opportunities to receive assistance with the home buying process.

- The H AFC is a HUD Certified Housing Counseling Center, which offers Homebuyer Education Workshops to prepare residents to become first-time homebuyers.
- H AFC offers the Family Self-Sufficiency Program – a 5-year program that provides tenants with individual training and supportive services to help the family prepare to transition out of assisted housing programs. The program encourages participants' families' self-sufficiency and helps expand family opportunities that address educational, socio-economic, recreational, and other human service needs.

The EPHA offers the Family Self-Sufficiency Program as well.

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

None of the housing authorities in Fulton County are designated as “troubled.”

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

### **Introduction**

Fulton County is covered by the Fulton County Continuum of Care, a network of service providers covering Fulton County (not including the City of Atlanta). The Fulton County Continuum of Care brings together housing and service providers to meet the needs of homeless individuals and families. Fulton County is in the process of completing a Homeless Plan that will seek to align existing planning efforts related to homelessness to foster a more consistent approach to homelessness and affordable / low-cost housing.

### **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 Coordinated Intake and Assessment System (CIAS) is designed to complete outreach and recruit homeless individuals and families throughout the geographic area of Fulton County, to assess their individual needs and facilitate access to services in response to those identified needs. CIAS utilizes a multi-tiered approach which requires for the operation of an Assessment Center centrally located in both the south and north areas of Fulton County. To satisfy eligibility criteria for participation in the Emergency Solutions Grant program, applicants must be below 30% AMI, according to the current HUD income limits (for homelessness prevention assistance), or homeless or at risk of becoming homeless (for rapid re-housing assistance) and lacking sufficient resources and support networks necessary to retain housing without ESG assistance. All ESG participants receive an initial consultation to determine eligibility and assistance.

Over the next year, the CoC and other homeless housing and service providers in Fulton County will continue reaching out to homeless persons, including unsheltered persons, through emergency shelter, meals, transportation, counseling, and case management. One of the objectives of Fulton County's draft Homeless Plan is to prioritize unsheltered and vulnerable households, with strategies that include training and support for service providers and integrated services with behavioral health and healthcare systems. The GA 502 Fulton County CoC and Fulton County established Homeless Assessment Centers at the North and South Fulton Annex offices in an effort to establish a collective community and county approach to supporting and providing solutions to homelessness and homeless prevention.

The GA 502 CoC hosts six CoC membership meetings a year to discuss homeless issues and strategies; provide ongoing updates through a newsletter and public announcements. Additionally, the CoC sponsors periodic workshops.

Hope through Soap provides outreach primarily in the North Fulton County area. They send referrals to the County Assessment Center for follow-up.

During the 2022 program year, Fulton County will use ESG funds to fund street outreach.

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

There are 67 emergency shelter beds in the County. Of these, the majority are for families with children. There are also 180 Transitional Housing units. Most transitional housing is available only to families with children and 4 beds are available for unaccompanied youth.

During the 2022 program year, Fulton County will use ESG funds to fund emergency shelter providers.

## **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**

During the 2022 program year, Fulton County will fund organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness. In addition, the County will fund case management, legal representation and counseling, emergency financial assistance, and rental assistance. The County will also work to increase the availability of affordable housing in Fulton County by using HOME funds to support the development of new affordable rental housing.

The GA 502 Fulton County CoC and Fulton County established Homeless Assessment Centers at the North and South Fulton Annex offices in an effort to establish a collective community and county approach to supporting and providing solutions to homelessness and homeless prevention.

A key objective of the County's draft Homeless Plan is to increase the inventory of diversion, rapid rehousing, and permanent supportive housing to successfully divert or quickly rehouse all eligible households.

Fulton County will use 2022 ESG funds for homeless prevention and rapid rehousing.

Fulton County has also applied for rapid rehousing funds through the Georgia Fiscal Recovery Fund. The program, Rehouse Fulton will provide rapid rehousing assistance to an estimated 600 households across a 2-year period. The County application has been submitted and is pending review.

## **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.**

Over the next year, housing and service providers in Fulton County will continue to work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. Organizations and resources to prevent homelessness that will be in place during the 2022 program year in Fulton County include:

- North Fulton Community Charities provides emergency financial assistance, thrift shop, food bank, government benefits screening, and rapid rehousing.
- The Community Assistance Center provides rental assistance, food, clothing and education resources for homelessness prevention.
- LIFT Community Development Corp. provides housing and shelter referrals, life and financial skills training, food and clothing giveaways, transportation assistance, education and employment referrals, and mental health and wellness assessments.
- HOPE Atlanta (Travelers Aid) provides rental and security deposit assistance, housing search assistance, one-on-one support, and rapid rehousing, as well as emergency services, crisis intervention, transitional and permanent supportive housing for persons living with HIV/AIDS. HOPE Atlanta's Supportive Services for Veterans and their Families Program funds rapid re-housing and prevention assistance to homeless veteran households.

The Homeless Department is navigating the County's work with diversion programs and in 2020 joined task forces that address justice and mental health.

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

### **Introduction:**

During the 2022 program year, Fulton County will provide HOP funds to help lower income households become homeowners. Removing the barrier for African American households to become homeowners is a means to building generational wealth.

### **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 January 2019, the Fulton County Board of Commissioners passed a resolution urging municipalities in Fulton County to implement affordable housing policies. The resolution allows the Development Authority of Fulton County to apply local affordable housing ordinances to any multi-family projects completed through the Development Authority.

The Analysis of Impediments to Fair Housing Choice (AI) completed for Atlanta and Fulton County in September 2020 identified barriers to affordable housing and homeownership. One primary barrier is the shortage of available units in areas of economic opportunity. The lack of investment in neighborhoods where there is affordable housing that are high concentrations of racial and ethnic concentrations, and a concentration of poverty creates further barriers. For persons with disabilities, the problems are magnified. There is a shortage of housing served by transit and other amenities. Zoning in many communities defines “family” in restrictive way that prevents development of shared housing and make it difficult to work with the ordinances that rely on variances and SUPs rather than reasonable accommodation. Language also creates a barrier to access to housing.

Programs that are funded by Fulton County that seek to overcome these barriers include the HOP – Homeownership program and a willingness to fund rental developments through the HOME Program. Public facility improvements in lower income areas alleviates some of the investment barriers in these areas.

The County continues to fund rental assistance for persons leaving emergency shelters or places not meant for human habitation through rapid re-housing and through a pending Georgia Fiscal Recovery Fund application.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

This section details Fulton County's actions planned to ensure safe and affordable housing for its residents, along with plans to meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

### **Actions planned to address obstacles to meeting underserved needs**

Fulton County identified the underserved needs as: affordable housing and homeownership opportunities, rehabilitation assistance for low-income homeowners, homeless prevention and rapid-rehousing, supportive services for persons experiencing homelessness and special needs populations, fair housing enforcement and education and community revitalization (including facility, park, and infrastructure improvements).

To help remove obstacles to meeting underserved needs and improve service delivery, Fulton County supports the continued development of the Fulton County Continuum of Care, a collaborative to coordinate the work of social service organizations, disseminate news and information, eliminate duplication of effort, and spearhead community-wide solutions to local needs. Fulton County will provide funding to address underserved needs through CDBG, HOME, ESG and general fund commitments in support of programs that address these needs. Such programs include:

- Housing development and homeownership
- Tenant Based Rental Assistance
- ESG funded facility operations and services
- ESG funded rapid re-housing and homeless prevention
- Community projects to improve parks, remove handicap barriers, improve sidewalks, water and sewer facilities

The Analysis of Impediments to Fair Housing Choice (AI) completed for Atlanta and Fulton County in September 2020 identifies obstacles to having a more equitable housing choice as well as institutional obstacles. Lack of knowledge of fair housing protection and redress results in lack of reporting. Lack of knowledge also presents obstacles facing persons with disabilities from seeking protection through fair housing laws. Training has been offered and will continue to be offered to advocacy groups and individuals seeking to address the needs of persons with disabilities.

The CDBG program will continue to fund Metro Fair Housing Services, Inc. to address this obstacle by conducting fair housing outreach and to assist residents navigate the complaint process with HUD and



the Georgia Department of Justice.

### **Actions planned to foster and maintain affordable housing**

Fulton County will continue to offer their core programs – including home purchase assistance and tenant-based rental assistance – in order to foster housing affordability. HOME funds will also be used to support the development of new affordable housing, including multifamily rental developments and homeownership opportunities. The County will continue to use HOME funds to support development of affordable housing by a local CHDO.

In addition to specific programs designed to foster and maintain affordable housing, the County will encourage participating jurisdictions to review their zoning ordinances for prospective barriers to affordable housing development, and to make amendments as needed.

### **Actions planned to reduce lead-based paint hazards**

Over the next year, Fulton County will continue to conduct lead-based paint inspections associated with the housing rehabilitation and homeownership programs and, if a hazard is found, remediation. These actions will both reduce lead exposure risk and help to maintain the county's older, lower and moderately priced housing. Any housing rehabilitation activities conducted using HOME and CDBG funds will continue to be monitored closely for any potential lead exposure.

### **Actions planned to reduce the number of poverty-level families**

Over the FY 2022 program year, Fulton County will continue its workforce development programs through WorkSource Fulton to connect individuals with job skills and employment. Homeless service providers will continue to offer job search and resume assistance. A focus on improving the jobs/housing balance in existing and emerging job centers in Fulton County will aim to help poverty-level families access more employment opportunities, while potentially lowering transportation and housing costs.

CDBG and HOME funds will continue to enforce the provisions of Section 3 providing Employment Opportunities to low-income residents of Fulton County. To the extent possible, Section 3 gives priority to hiring workers for federally funded projects over \$200,000 and to contracting and subcontracting with businesses that are Section 3 certified.

### **Actions planned to develop institutional structure**

Fulton County has developed a robust administrative structure to manage its CDBG, HOME, and ESG funds. The County's Department of Community Development offers technical assistance sessions for potential subrecipients, CHDOs, and contractors to learn how to effectively administer funding from the CDBG and HOME programs. In addition to working with organizations, the County's citizen participation process is designed to keep constituents abreast of funding plans and make engaged and informed citizens another vital part of the institutional structure.

The CoC hosts 6 membership meetings a year to discuss homeless issues and strategies; provide ongoing

updates through a newsletter and public announcements. Additionally, the COC sponsors periodic workshops. These venues allow the County to be involved in the overall system to address homelessness.

The AI pointed to the need to address education and knowledge of Fair Housing protections. Metro Fair Housing Services, Inc., a nonprofit fair housing advocacy organization whose service area includes Fulton County and the City of Atlanta, was awarded grant funding under HUD's Fair Housing Initiatives Program (FHIP) in 2020. Under the FHIP, HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. Both HUD and the Georgia Department of Justice adjudicate complaints. CDBG funding is also granted to Metro Fair Housing Services, Inc.

The County will continue to strengthen its outreach to limited-English speaking persons in accordance with the Language Access Plan.

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

Fulton County will continue to be an active participant in the Fulton County Continuum of Care. The CoC promotes community-wide commitment to goals of ending homelessness; quickly re-housing homeless individuals and families; effective utilization of mainstream resources; optimizing consumer self-sufficiency. Membership includes emergency, transitional, and permanent housing providers, nonprofit social service organizations, and government agencies.

## Program Specific Requirements

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

**Introduction:**

Fulton County will continue to receive CDBG, HOME and ESG funding in 2021.

#### 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
<b>Total Program Income</b>	<b>0</b>

#### 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 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.	100%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

**1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Fulton County does not anticipate investing HOME funds in other forms than described in 24 CFR Section 92.205(b) of the HOME Investment Partnerships Final Rule regulations effective October 1, 1996 and as subsequently amended. The County will notify HUD as appropriate if any changes are proposed and follow the applicable substantial amendment process as outlined in the County's Citizen Participation Plan.

**2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

If direct subsidy is given to a homebuyer HOME funds shall be subject to Recapture. If no direct subsidy is given to a homebuyer the purchase shall be subject to Resale.

The amount of subsidy to recapture is limited to the direct homebuyer assistance that was provided. If a homebuyer sells the home before the HOME affordability period has expired, the owner must repay HOME funds in accordance with the County's program guidelines as follows:

Federal regulations for the HOME Program specify certain requirements for recapture provisions when HOME funds are used to assist with homeownership purchase. The housing unit must be the principal residence of the household throughout the affordability period. To ensure affordability, the County has imposed the recapture mechanism to collect all of the direct HOME funds when the recipient decides to sell the house within the affordability period or no longer resides in the home as their principal residence. The following is exercised: (1) the homebuyer may sell the property to any willing buyer; (2) the sale of the property during the affordability period triggers repayment of the direct HOME funds that the buyer received when he/she originally purchased the home.

A lien will be placed on the property and recorded with the County Recorder to assure the First Time Homebuyer Program deferred loan is repaid in the event of a default under the loan terms and conditions during the loan's affordability period. Full repayment of the HOME funds is required when a resale occurs during the affordability period, or the homeowner no longer occupies the home as their principal residence. However, if there are no net proceeds or insufficient proceeds to recapture the full amount of HOME funds invested, the amount subject to recapture will be limited to what is available from net proceeds (net proceeds are the sales price minus superior loan repayments and any closing costs).

Once the HOME funds are repaid, the property is no longer subject to any HOME restrictions. Recaptured funds must be used to carry out HOME eligible activities in accordance with the HOME guidelines and are not considered proceeds.

The Resale Provision restricts the homebuyer's ability to resell. If a homebuyer sells the home before the HOME affordability period has expired, the owner must resell the home to a low income buyer whose household income does not exceed 80% of area median income. If the house is in the NSP Program the homebuyer's income can go up to 120% of area median income.

**3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

Federal regulations for the HOME Program specify certain requirements for resale. The affordability period is based on total HOME investment in the property. The housing unit must be the principal residence of the household throughout the affordability period. To ensure affordability, the County has imposed the resale mechanism to keep the house affordable to low-income homebuyers when the recipient decides to sell the house within the affordability period or no longer resides in the home as their principal residence. The following is exercised: (1) the homebuyer may sell the property to a willing buyer that meets HUD's low-income eligibility; (2) the seller must receive a "fair return" on original investment plus improvements. A restrictive covenant will be placed on the property and recorded with the County Recorder to assure the home remains affordable.

**4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

Refinancing is not an eligible activity under any federally funded HOME programs. Therefore, Fulton County does not plan to use HOME funds to refinance existing debt and has not established refinancing policy guidelines for the use of HOME funds.

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

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

Fulton County enthusiastically supports and partners with the GA 502 Fulton County CoC approach to addressing the needs of people who are homeless or at risk of becoming homeless. The shared vision and commitment are focused on rooting out the causes of homelessness and aiding individuals and families in their successful reintegration into the community. Fulton County and the GA 502 Fulton County CoC work collaboratively to identify and serve the chronically homeless, youth, families, and veterans through the GA 502 Coordinated Intake and Assessment System (CIAS). The staff of the Fulton County's Homeless Division provides administrative support to the GA 502 Board of Directors. Utilizing ESG and other jurisdictional allocations coupled with the CoC Supportive Housing Program grant funds, the planning committee formulates the plan to implement strategies to address the 7 performance measures targeting the groups identified above and measures, using HMIS performance data, the impact of the strategies on the intended population. Fulton County's ESG written standards are included as an attachment to this plan.

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

The Coordinated Intake and Assessment System (CIAS) is designed to complete outreach and recruit homeless individuals and families throughout the geographic area of Fulton County, to assess their individual needs and facilitate access to services in response to those identified needs. CIAS utilizes a multi-tiered approach which requires for the operation of an Assessment Center centrally located in both the south and north areas of Fulton County. To satisfy eligibility criteria for participation in the Emergency Solutions Grant program, applicants must be below 30% AMI, according to the current HUD income limits (for homelessness prevention assistance), or homeless or at risk of becoming homeless (for rapid rehousing assistance) and lacking sufficient resources and support networks necessary to retain housing without ESG assistance. All ESG participants receive an initial consultation to determine eligibility and assistance.

**3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).**

In accordance with HUD 24 CFR 576.3 (Allocation of Funding), regulations mandate that 7.5% of funds should be spent on administrative activities, a maximum of 60% of Fulton County's ESG funds are to be spent on shelter activities, and the remaining 40% are to be spent on homeless prevention and rapid rehousing activities proposed by organizations. The Department of Community Development administers ESG funds through its Homeless Assessment Centers and awards grant funds to sub-recipients to carry out eligible activities in compliance with all applicable federal regulations. The ESG written standards

attached to this plan outline the County's process for allocating ESG funds.

- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

Not applicable. Fulton County successfully meets the homeless participation requirements.

**5. Describe performance standards for evaluating ESG.**

ESG performance standards are upheld through review of monthly or quarterly reports determined by the designated ESG Project Manager depending on the project or service to the County. It is imperative that the reports are submitted as scheduled. The County is responsible for reporting program accomplishments to HUD, who in turn submits the information in congressional reports. Each Project Manager responsible for technical support of the subrecipient will provide reporting formats prior to commencement of the ESG-funded project or service. Project Manager(s) will visit the site of each project or service delivery location no less than annually to assess progress. Additional site visits may be required depending on the subrecipient's need for technical support. Each ESG subrecipient must keep records of fund expenditures; a copy of the ESG contract executed with Fulton County; and all other project or service information important to the administration of the project for a minimum of four (4) years. The County will monitor ESG subrecipient files and record keeping procedures at least annually. Each agency receives notification in writing prior to the anticipated monitoring date. The HMIS database is also reviewed to review performance.

**Attachments:**

ESG Performance Standards

HOME Recapture policy