



# Consolidated Annual Performance Evaluation Report (CAPER)

US Department of Housing and Urban Development

HOME Investment Partnerships Program

Program Year 2016

July 1, 2016 to June 30, 2017

## Greenwood County HOME Consortium

Counties of Greenwood, Abbeville, Edgefield, Laurens, McCormick, Saluda

State of South Carolina

September 30, 2017



Upper Savannah Council of Governments

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## CR-05 - Goals and Outcomes

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan.**

#### **91.520(a)**

Note: This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The assessment provided in this CAPER covers Program Year 2016 (PY16), which is July 1, 2016-June 30, 2017. This is the Greenwood HOME Consortium's (Consortium) eighth year of HOME Program funding and the third year of its current Consolidated Plan 2014-18. Greenwood County is the lead entity for the Consortium which consists of six counties including Greenwood, Abbeville, Edgefield, Laurens, McCormick, and Saluda. Through an administrative agreement, the Upper Savannah Council of Governments (COG) provides staff and administration of the HOME program on behalf of the Consortium.

The Consortium received an allocation of \$ 618,544 in HOME funding in July 2016; however, all the activities completed or committed during PY16 were funded from previous allocations.

The Consortium's housing activities during the program year included homebuyer, rental, and owner-occupied rehab. Three certified Community Housing Development Organizations (CHDOs) were involved with the rental and homebuyer activities: Greenwood Area Habitat for Humanity, Homes of Hope, and Nehemiah CRC.

In PY16, the Greenwood Area Habitat for Humanity, a CHDO, executed written agreements for four homebuyer projects which have all been sold to eligible homebuyers. It also completed four homebuyer projects initiated prior to PY16.

Laurens County Habitat for Humanity, a non profit, did not execute any written agreements during PY16; however, it did complete two homebuyer projects initiated the previous year. Both have been sold to eligible homebuyers.

Homes of Hope, a CHDO, did not execute any written agreements in PY16; however, it did complete two rental projects initiated prior to PY16. One project contains four single family rental units which are fully occupied by eligible tenants. The other project contains three single family rental units, two of which are leased. There is currently one vacant unit which we anticipate leasing to an eligible family in the near future.

Nehemiah CRC, a CHDO, executed a written agreement for the construction of two 3BR single family rental units. It also completed the lease up and close out of a rental project initiated prior to PY16 consisting of eight two-bedroom apartment units in duplex format. The units are fully occupied. In addition, construction continues on a rental project which consists of six single family units, two of which are funded by the Consortium. The funding for this project was committed prior to PY16; however, its budget was increased in PY16 through a budget revision.

During PY16, written agreements for three owner-occupied rehabs were executed. All three have been completed. In addition, three owner-occupied rehabs from the previous program year were also completed.

During PY16, one request for CHDO Operating Assistance was granted.

The Greenwood County HOME Consortium received its initial HOME funding in PY09. From PY09-PY16, the Consortium has received a total of \$5,356,923 in funding. Of that amount, a total of \$4,548,071 has been committed to projects. An additional \$221,257 has been awarded for CHDO Operating Assistance and \$535,692 for Administration. The remaining \$51,903 was committed to two owner-occupied rehab projects in July 2017, after the end of PY16. HOME projects funded in the Consortium area PY09-PY16 include the rehabilitation of thirty five owner-occupied houses, the construction of twenty five single-family homes for homebuyers with an additional four in progress, and the construction of forty rental units with an additional four in progress.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing Development	Affordable Housing	HOME: \$1,176,438	Rental units constructed	Household Housing Unit	12	12	100.00%	4	15	375.00%
Housing Development	Affordable Housing		Homeowner Housing Added	Household Housing Unit	10	12	120.00%	2	6	300.00%
Housing Development	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	8	0	0.00%			0.00%
Preservation of existing housing stock	Affordable Housing	HOME: \$1,176,439	Rental units rehabilitated	Household Housing Unit	6	0	0.00%			0.00%
Preservation of existing housing stock	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	30	22	73.33%	2	6	300.00%
Program delivery	Affordable Housing	HOME: \$261,430	Other	Other	1	1	100.00%	1	1	100.00%
Support efforts for homeless, special needs	Homeless Non-Homeless Special Needs	HOME: \$0	Other	Other	1	1	100.00%			0.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The Consortium does not receive CDBG funding.

The high priority needs identified in the Consolidated Plan are as follows:

1. Housing rehabilitation for existing homeowners
2. New Construction ownership
3. New Construction rental
4. Homebuyer Assistance
5. Rental Rehab
6. Homelessness
7. Non Homeless with Special Needs

*1—Housing Rehabilitation for Existing Homeowners*

The Consortium helps preserve the area's affordable housing stock by providing grants, deferred loans and/or low-interest loans to low and moderate-income homeowners to substantially rehabilitate their homes. During PY16, the Consortium completed three rehabs from the previous program year. It also committed funding to three rehabs that were completed during the program year.

*2 — New Construction ownership*

The Consortium expands the area's affordable homebuyer opportunities by providing grants, deferred loans and/or low-interest loans to low and moderate-income households to purchase their own homes. During PY16, the Consortium’s partner agencies completed six homes for homeownership started in the previous year. There are also two houses from the previous year that are still in progress. The Consortium also committed funding to an additional four houses for homeownership that are currently in progress. All completed units have been sold to eligible homebuyers.

*3 — New Construction rental*

The Consortium seeks to preserve and expand available affordable housing opportunities in cooperation with qualified for-profit and nonprofit developers. During PY16, the Consortium worked with partners to complete fifteen new rental units committed prior to PY16. An additional two units from the previous year are still in progress. The Consortium has also committed funding for the construction of two more single family rental units that are still in progress. All but one of the completed units have been leased to eligible tenants. The Consortium is working diligently to lease the last completed unit to an eligible household.

*4 - Homebuyer Assistance*



Moderate-income families can benefit from down payment and closing assistance through HOME funding giving them greater access to opportunities for affordable home ownership and housing choice.

#### *5 - Rental Rehab*

Agencies working with low income families struggle to find affordable rental units within the Consortium area. Repair of affordable rental units provides more housing choice and helps address the cost burden of low-income households.

#### *6 - Homelessness*

HOME funding cannot directly address the needs of the homeless; however, the Consortium assists direct provider organizations when possible.

#### *7 - Non Homeless with Special Needs*

The Consortium addresses this goal through its housing rehabilitation program by giving special consideration to households with veterans and/or individuals with special needs. The Consortium completed six rehabs in PY16 which included one veteran, five disabled, and three elderly beneficiaries. In addition, three rental projects were completed. The units were rented to eligible beneficiaries which included three disabled and ten elderly beneficiaries. No additional HOME funding was expended to achieve this goal.

## CR-10 - Racial and Ethnic composition of families (beneficiaries) assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

White	12
Black or African American	45
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>57</b>
Hispanic	0
Not Hispanic	57

Table 2 - Table of assistance to racial and ethnic populations by source of funds

### Narrative

There were a total of fifty-seven beneficiaries assisted by the Consortium through activities completed during PY16. This included twelve white beneficiaries and forty five African-American beneficiaries.

Overall, the Consortium has completed 100 units from the formation of the Consortium through June 30, 2017, including 35 owner-occupied rehabs, 25 single-family homes for homebuyers, and 40 rental units. An additional four single family homes for eligible homebuyers and four single family rental units, committed during or prior to PY16, are in progress. The completed projects have assisted 254 beneficiaries. The beneficiaries include 47 White and 207 African-American individuals. Other beneficiary characteristics include 42 elderly, 42 disabled, and 72 female heads of households. All households had income levels at or below 80% AMI.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year 2016
HOME	Public – Federal	\$ 1,778,011.56	\$ 752,610.57

Table 3 – Resources Made Available

### Narrative

HOME funding is the only Federal allocation available to the Consortium. The FY16 allocation was \$618,544.

The amount of *Resources Made Available* at the beginning of PY16 was \$1,778,011.56 which includes both the PY16 allocation of \$618,544 and the unexpended funding from previous years of \$752,610.57.

The entire amount of funding indicated as the *Amount Expended During PY16* reflects funding allocated in previous years that was expended during PY16. None of the FY16 allocation has been expended, including admin.

As the Consortium did not seek renewal at the end of its three-year commitment in June 2017, it requested that HUD deobligate its FY16 allocation which has not been committed or expended. The SC field office of HUD was notified via phone, email, and a letter dated 3/3/17 from the County Manager of the Consortium's lead county.

All required funding was committed to activities prior to the June 30, 2017 commitment deadline.

Note: HUD reports indicate that it has not yet deobligated the Consortium's FY16 funding or changed the Consortium's status from automatic renewal.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Consortium Area	100%	100%	HOME funding

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The Consortium does not target specific areas in the region because the need for affordable housing is widespread in the six-county area and similar conditions exist in all areas. During PY16 projects were completed in the counties of Greenwood, Laurens, Edgefield, and Abbeville. In previous years projects

have been completed in Saluda and McCormick Counties. The location of projects is often driven by the developers and non profits who propose the projects, and by the referrals received from nonprofit and health service organizations.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The Consortium service area does not include any Entitlement Cities/Counties and all local governments must compete for other funding sources to augment HOME funds. Other competitive funding sources available to local units of government within the consortium service area are:

- State HOME funds
- State CDBG funds
- State Housing Trust Funds
- USDA Rural Development Housing Preservation Grant funds
- Federal Home Loan Bank of Atlanta
- Low-income Housing Tax Credits
- Private foundations
- Donations of volunteer labor and materials

The above funds are available on a competitive basis. Even though the annual HOME allocation is not insubstantial, the need for decent, safe, and affordable housing within the region is far greater than the HOME allocation can address.

The Consortium members do not have allocations of Section 8 funds, Low Income Tax Credits, McKinney-Vento Homeless Assistance Act funding but would incorporate such funding if available through a partnership with a project developer or CHDO.

The Consortium will carry out affordable housing activities with funding primarily provided through the HOME program as funded through the US Department of Housing and Urban Development.

HOME regulations require a 25 percent non-federal match for all projects funded. All participating jurisdictions (PJs) must contribute or match 25 cents for each dollar of HOME funds spent on affordable housing. As PJs draw funds from HOME Investment Partnership Funds, they incur a match liability, which must be satisfied by the end of each Federal fiscal year.

The HOME statute provides for a reduction of the matching contribution requirement under three conditions:

- Fiscal distress
- Severe fiscal distress
- Presidentially-declared major disasters covered under the Stafford Act

The criteria for fiscal and severe fiscal distress are based on (1) family poverty rate, and (2) per capita income (PCI). When a local jurisdiction meets one of these distress criteria, it is determined to be in

fiscal distress and receives a 50 percent reduction of match. If a local jurisdiction satisfies both of the distress criteria, it is determined to be in severe fiscal distress and receives a 100 percent reduction of match.

The Greenwood County HOME Consortium was granted a 100% match reduction for PY16 due to a determination of severe fiscal distress. *See Attachment 1: PY16 Match Reduction in SC*

Although no match liability was incurred during PY16, the Consortium continues track match in order to be leveraged as permanent contributions to affordable housing.

Other agencies that might be accessed for funding assistance include the US Department of Rural Development (RDA) that offers grants and loans to local governments to address a wide variety of activities including water, sewer and other infrastructure improvements/upgrades; housing grants and loans to individuals for purchase and repairs; and public facilities projects for emergency services.

The match report included as part of the CAPER illustrates that match is being accumulated as a result of volunteer hours and donated materials and services provided by the local Habitat chapters.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$ 753,905.46
2. Match contributed during current Federal fiscal year	\$ 19,357.50
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$ 773,262.96
4. Match liability for current Federal fiscal year	\$ 0.00
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 773,262.96

**Table 5 – Fiscal Year Summary - HOME Match Report**

<b>Match Contribution for the Federal Fiscal Year</b>								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources) \$	Foregone Taxes, Fees, Charges \$	Appraised Land/Real Property \$	Required Infrastructure \$	Site Preparation, Construction Materials, Donated labor \$	Bond Financing \$	Total Match \$
10	11/30/2016					18,102.50		18,102.50
3	12/30/2016					1,255.00		1,255.00

**Table 6 – Match Contribution for the Federal Fiscal Year**

## HOME MBE/WBE report

<b>Program Income</b> – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$ .67	\$ 3.79	\$ 2.78	\$ 0.00	\$1.01

**Table 7 – Program Income**

<b>Minority Business Enterprises and Women Business Enterprises</b> – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	\$ 478,762	\$ 0	\$ 0	\$321,812	\$ 0	\$ 156,950
Number	8	0	0	4	0	4
<b>Sub-Contracts</b>						
Dollar Amount						
Number						
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	\$ 478,762	\$ 0	\$ 478,762			
Number	8	0	8			
<b>Sub-Contracts</b>						
Dollar Amount						
Number						

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property</b> – Indicate the number of HOME-assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0
Number	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0			\$0	
Businesses Displaced		0			\$0	
Nonprofit Organizations Displaced		0			\$0	
Households Temporarily Relocated, not Displaced		0			\$0	
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**



## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	8	19
Number of special-needs households to be provided affordable housing units	0	8
<b>Total</b>	<b>8</b>	<b>27</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	6	21
Number of households supported through the rehab of existing units	2	6
Number of households supported through the acquisition of existing units	8	0
<b>Total</b>	<b>8</b>	<b>27</b>

Table 12 – Number of Households Supported

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

In an effort to develop affordable, safe, and decent housing for low-income citizens, the Consortium proposed in its 2016 Action Plan to retain affordable housing stock by rehabbing two owner-occupied units. HOME funding was projected to be provided to increase the availability of affordable permanent housing through the construction of two new homeowner units and four new rental units that would be accessible to job opportunities.

The 2016 program year goal of supporting eight households was met and surpassed. The Consortium completed six owner-occupied rehabs, six homeowner units, and fifteen rental units.

**Discuss how these outcomes will impact future annual action plans.**

In PY16, the Consortium executed written commitments to fund two new single family rental units in addition to the fifteen units that were completed during the program year and the two that are still in progress from the prior funding year. It also executed written agreements for four new homebuyer units in addition to the six that were completed during the program year. As to rehabs, the Consortium executed written agreements for three units and has completed all three. The Consortium also completed three rehabs funded in the previous year.

Although in Spring 2017, the decision was made not to renew the Consortium beyond its current three-year commitment ending June 30, 2017, it intends to follow through on all obligations associated with projects committed and funded under allocations through PY15.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	0	5
Low-income	0	9
Moderate-income	0	43
<b>Total</b>	<b>0</b>	<b>57</b>

**Table 13 – Number of Persons Served**

**Narrative Information**

The Consortium does not receive CDBG funding; therefore, no CDBG funding was disbursed by the Consortium.

The income levels of the beneficiaries/units completed in PY16 can also be further broken down by the types of activities as follows:

- Extremely Low-income:
  - Owner-occupied rehab: 1 beneficiary/1 unit
  - Homebuyer: 0 beneficiaries/ 0 units
  - Renter: 4 beneficiaries/2 units
  - Total: 5 beneficiaries/3 units
  
- Low-income:
  - Owner-occupied rehab: 0 beneficiary/0 unit
  - Homebuyer: 0 beneficiaries/0 units
  - Renter: 9 beneficiaries/5 units
  - Total: 9 beneficiaries/5 units

- Moderate-income:
  - Owner-occupied rehab: 9 beneficiaries/5 units
  - Homebuyer: 20 beneficiaries/6 units
  - Renter: 14 beneficiaries/7 units
  - Total: 43 beneficiaries/18 units

In addition to the units listed above, there is one vacant rental unit; therefore beneficiaries for that unit could not be included. There were no other HOME-assisted beneficiaries for projects completed in PY16 other than those detailed above.

All completed units met the definition of affordable housing from Section 215 of the Cranston-Gonzalez National Affordable Housing Act, as amended, including:

- Owner-occupied rehab: 10 beneficiaries/6 units
- Homebuyer: 20 beneficiaries/ 6 units
- Renter: 27 beneficiaries/15 units
- Total: 57 beneficiaries/27units

The Consortium seeks to address the jurisdiction's worst case needs and the needs of persons with disabilities primarily through its owner-occupied rehab program by giving particular consideration to eligible households that include veterans, the elderly, and the disabled. In PY16, the Consortium completed six rehabs which included one veteran, three elderly beneficiaries and five disabled beneficiaries.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The HOME Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance.

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

The HOME Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The HOME Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The HOME Consortium seeks to assist families and individuals avoid homelessness by improving the affordable housing stock in the Consortium jurisdiction including owner-occupied home rehabilitation

and owner-occupied new construction and new construction for rental units through funding to CHDOs. In the past year the Consortium worked to improve the affordable housing stock through written agreements and partnerships which lead to the completion of six owner-occupied units, ten units for eligible homebuyers, and fifteen rental units. Many of the units completed during the program year were constructed with funds committed in the previous year including three of the owner-occupied units, four of the homebuyer units, and all fifteen of the rental units

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

Two of the Consortium CHDOs completed construction on rental projects during the PY16 program year. Nehemiah CRC completed a project of eight affordable 2BR housing units in phase IV of the Mathews Place project in the Mathews Mill area in the City of Greenwood. Homes of Hope completed two projects with a total of seven 3BR single family rental units in the City of Clinton. These new units have been rented initially to tenants whose income level is at or below 60% LMI. These new units expand the current housing stock available to low-income households which will provide an opportunity to reduce the waiting list for Public Housing.

In addition, the HOME Consortium assists public housing agencies through technical assistance when possible. For example, in 2014 and 2015, the HOME Consortium assisted the Greenwood Public Housing Authority (PHA) by doing Environmental Reviews for them which included all activities in their five-year plan and update.

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

The Consortium partners with Habitat for Humanity for its homeownership program. Greenwood Habitat publishes a monthly newsletter, posts information online and in the newspaper, and holds information sessions concerning homeownership opportunities. Laurens Habitat disseminates information through the United Ministries in Clinton, SC in the Samaritan's Corner building which also houses the United Way and the Food Bank. Potential homeowners are also required to participate in homeowner education classes to better prepare them for the obligations of homeownership. HOME coordinates with Habitat staff on efforts to verify the eligibility of interested residents for homeownership.

### **Actions taken to provide assistance to troubled PHAs**

There are no troubled PHAs in the Consortium jurisdiction.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The cost of housing or the incentives to develop, maintain, or improve affordable housing in the region are affected by the policies, including tax policies, affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

The Consortium is composed of multiple units of local governments including counties and municipalities. The Consortium as a PJ does not have any jurisdiction in the local policies of its members including zoning, land use or code enforcement. However, the Consortium is staffed by the Upper Savannah COG which provides technical and planning assistance including ADA compliance, hazard mitigation, and economic development among others to regional counties and municipalities. The staff remains in close contact with regional political and agency leadership and encourages Consortium members to be aware of local conditions that may pose barriers to affordable housing and address any situations that could prevent the development of affordable housing. The Consortium supports qualified CHDO developers who apply for HOME funding to construct affordable housing within the region. It also supports the efforts of other partners such as local chapters of Habitat for Humanity in their efforts to construct affordable housing and on education and awareness of issues concerning affordable housing.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Recognizing that limited HOME dollars should be focused where the need is greatest; the Consortium has allocated funding to reduce the identified housing need of cost burden. Funding for projects is allocated toward owner-occupied rehab in order to preserve existing housing stock and toward the new construction of affordable housing for homebuyers and renters. These projects directly benefit low and moderate income residents and serve those who have the greatest need, including areas with the greatest concentrations of poverty.

The Consortium encourages the support of local service providers that are currently working with the underserved in the region. This includes the local senior centers that provide services and some transportation services to area seniors. The Consortium also continues to work with CHDOs and nonprofits that provide housing counseling and credit counseling to low- to moderate-income families.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

In 1978, lead-based paint was banned for use in residential construction because it can be hazardous if ingested and is particularly dangerous to young children. According to the South Carolina Department of Health and Environmental Control, houses built before 1950 are very likely to contain lead-based paint, those built between 1950 and 1978 are less likely to contain lead-based paint, and those built after 1978 are unlikely to contain lead-based paint.

The data indicates that approximately half of the housing units (41,955) in the Consortium area were built prior to 1980 including 50% of owner-occupied units and 55% of rental units. Among units constructed prior to 1980, 38% of owner-occupied units (22,582) and 38% of rental units (8,402) were built between 1950-1979. According to SC DHEC, these units are at risk, but are less likely to contain lead paint. Among the units built before 1950, there are 7,324 owner-occupied units (12%) and 12,357 rental units (17%). These units are more likely to contain lead-based paint which can pose a health risk to occupants, particularly children and pregnant women.

All units selected for HOME assistance that were built prior to 1978 are tested for lead-based paint (LBP) before any work orders are finalized. Appropriate measures are undertaken to inform the owner/occupants of any hazards, to abate identified hazards, and to provide a clearance of all units at completion of the project.

The Consortium remains committed to helping combatting the potential hazards of lead-based paint and maintains the following policies concerning LBP in accordance with Federal guidelines

1. Requires lead-based paint risk assessments, reductions and abatements, as outlined in Federal legislation, by all those participating in the HOME program or utilizing HOME program funds.
2. Encourages and instructs property owners in preventative property maintenance to ensure that LBP hazards are not further exacerbated, i.e.,: keeping painted surfaces intact and free of flaking, chipping or peeling paint; maintaining walls and other surfaces in structurally sound condition; painting periodically; and controlling moisture and preventing water damage.
3. Provides information and technical assistance to CHDOs and other recipients of HOME funds.
4. Notifies residents and owners of all houses receiving HOME assistance of the hazards of LBP.
5. Coordinates efforts with SCDHEC for testing and referral when lead hazards are addressed in units which house children.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

HOME funding is used to improve the housing conditions of those in poverty. The analysis of housing problems conducted for the development of the current five-year Consolidated Plan indicated that the most common housing problem among low- to moderate-income households in the Consortium area with at least one housing problem was severe cost-burden (46%) followed by cost burden (42%).



HOME-funded projects directly help alleviate cost burden on families by allowing them to redirect their limited funds toward other pressing needs. In this sense, all housing projects undertaken by the Consortium work toward reducing poverty. The Consortium also supports the agencies that serve and support families in poverty.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The HOME Consortium is staffed by the Upper Savannah COG which also houses programs related to Aging, Workforce Development, Economic Development, Government Services, and Community Development. The Consortium communicates and coordinates with various service agencies, government departments, businesses, local municipalities, and special needs boards and commissions to find opportunities to better serve the citizens of region. Upper Savannah employees communicate on a regular basis with County and Municipal leadership and staff as well as with public and private agencies related to home health care, housing, homelessness, unemployment, infrastructure, and social services. These relationships are integral in streamlining the implementation of HOME projects in a time of limited funding. Communication continues to be a key factor in the success of the programs. The Consortium staff actively continues to foster these relationships in order to extend and improve the success of the HOME program.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The Consortium is involved through the Upper Savannah COG staff with the coordination between public/private transportation service providers in the region as the COG is working with these agencies in transportation planning and funding. There are partnerships region-wide with interagency groups such as the county senior centers to provide low- to moderate-income persons with access to public transportation to meet the demands of daily life. Through the community needs assessment process and interagency contacts, all partners and key stakeholders are involved in the planning process and provide input on an on-going basis.

Although the Consortium does not own or operate any public housing development, it supports the efforts of other organizations in improving public housing conditions and availability. The Consortium has developed a very strong working relationship with various agencies that offer housing to low-to-moderate income citizens. Some of these agencies include:

- Greenwood Area Habitat for Humanity
- Nehemiah Community Revitalization Corporation
- Homes of Hope
- Greenwood Public Housing Authority

- The Lakelands Rural Transition Housing Program

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The following activities were undertaken during the program year to help remove barriers to Fair Housing choice.

- Fair Housing posters displayed in all six county office buildings in the Consortium area and most of the local towns/cities.
- Fair Housing logo used on all publications
- Fair Housing mentioned at all public hearings
- An article about Fair Housing published in a local newspaper of general circulation.
- Resolution designating April as Fair Housing month adopted and published in local newspaper of regional circulation
- Fair Housing information and brochures given to the Association of Realtors for distribution
- Fair Housing information and brochures given to the Greenwood Area Habitat for Humanity for distribution.

In addition, the Consortium addressed the following impediments: 1) *Local Code Enforcement* and 2) *Infrastructure*.

*Local Code Enforcement*

The Consortium continues to be an advocate for affordable housing and vigilant to proposed building codes and policies in its jurisdiction which may have negative impacts on affordable housing.

The Upper Savannah COG offers a state-mandated training program for planning commissioners, board of zoning appeals members, board of architectural review members, code enforcement staff, and county staff on a regular basis. The training includes code enforcement issues and the housing element of the comprehensive plan among other topics. During PY16, USCOG held the training approximately twelve times throughout the year among the six counties of the Consortium. A total of 113 people completed the training in PY16.

The Consortium also promotes the development of affordable housing by encouraging local governments to identify abandoned or neglected properties in their jurisdictions that could be donated to nonprofits and developed into affordable housing.

Consortium staff have provided assistance to a project to revitalize a blighted, condemned vacant apartment complex into a Habitat for Humanity neighborhood project which will provide up to fifteen new single family affordable housing units. Consortium staff completed the Environmental Review (ER)

for the Community Development Block Grant (CDBG) grant funding the demolition phase. Future phases will include new onsite infrastructure and the construction of the new homes.

### *Infrastructure*

Consortium staff are actively engaged in supporting the on-going efforts of the USCOG Community Development Block Grant (CDBG) program to address infrastructure needs in low- to moderate-income areas in the Consortium jurisdiction. During PY16, Consortium staff provided assistance with regional CDBG grants for two demolitions of blighted apartment complexes, a streetscape, a waterline upgrade, a wastewater treatment plant upgrade, and three sewerline upgrades. All of these projects concern infrastructure improvements in low-income areas.

The Consortium works closely with USCOG in the development of the regional Comprehensive Economic Development Strategy (CEDS). The current CEDS has been updated and is out for public review. The CEDS enables the six-county region to remain eligible for funding from the Economic Development Administration (EDA). The EDA funds infrastructure grants related to job creation. USCOG submitted two EDA infrastructure grants in PY16 with assistance from Consortium staff. One was approved for \$2.5m in EDA funding. The other is still in the review process.

In sum, USCOG plays an active role in the development of local and regional code enforcement and infrastructure efforts and strives to be an advocate for affordable housing in the Consortium area.

## CR-40 - Monitoring 91.220 and 91.230

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

The Consortium undertakes an annual monitoring and evaluation process of partners with active projects to ensure that programs are carried out in accordance with the Consolidated Plan, written funding agreements, and HOME Program regulations. The Consortium has implemented its monitoring program in accordance with requirements set forth by HUD. Monitoring of the implementation of the Consolidated Plan and Annual Action Plan includes periodic telephone contacts, written communications including email correspondence, data collection, submission of reports, analysis of report findings, periodic meetings and workshops, and evaluation sessions. General procedures used when monitoring partner organizations include:

- Meetings with appropriate officials including an explanation of the purpose of the monitoring process.
- Review of appropriate materials such as reports and documents that provide more detailed information on the programs and their status.
- Interviews with members of staff and the community to discuss performance.
- If appropriate and necessary, a closed conference with program officials.
- Provision of comments and recommendations as needed.

The Consortium administrative staff conducts periodic monitoring of its projects and its partners and CHDO's on an on-going basis. With the rehabilitation work, a rehabilitation specialist develops the scope of work, addresses day-to-day construction issues, conducts inspections to confirm work quality, and facilitates payment of contractors. The rehabilitation process includes public body estimates, contractor selection, and owner education. The Rehabilitation Specialist documents the process of approving funds to be released, preparing punch lists, and establishing good working relationships with the contractors. The documentation of the process and progress on jobs is important in order to provide evidence of compliance to all funding sources. Photographs of the projects before and after completion of the work are taken and kept on file as proof of accomplishments, for environmental purposes, and for use as an occasional marketing tool for selected projects.

CHDOs that have an active written agreement with the Consortium are monitored annually.

On-site monitoring was performed during the program year for Greenwood Area Habitat for Humanity, Laurens County Habitat for Humanity, Nehemiah CRC, and Homes of Hope. Technical assistance was also provided to Laurens County Habitat for Humanity. No findings or concerns were noted and all monitoring procedures were closed without the need for follow up.

## CR-50 - HOME 91.520(d)

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

As required by 24 CFR Part 108, Compliance Procedures for Affirmative Fair Housing Marketing, all project owners of five or more HOME assisted units are required to adopt an approved Affirmative Fair Housing Marketing Plan (AFHMP). This plan outlines the steps to be taken to market the units that advertises the availability and encourages applications on an equal opportunity basis. This includes the EEO slogan, logo or statement in all advertising as well as a HUD Fair Housing poster in the offices where rental activity takes place. Marketing efforts will be made to reach those least likely to apply for these housing units. All AFHMPs are reviewed and approved by Consortium staff.

### **Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

The Consortium does not generate program income. The only program income it receives is an insignificant amount (less than \$5 per year) from earned interest.

### **Describe other actions taken to foster and maintain affordable housing. 91.220(k)**

#### **(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

HOME funds were used to foster and maintain affordable housing in several ways. The Consortium preserved affordable housing stock through the rehabilitation of six owner-occupied homes. It increased homeownership through the completion of six affordable homebuyer units sold to six eligible low- to moderate-income families. It also has four homes for homeownership still in progress – all four were funded in PY16. In its owner-occupied rehabilitation program, the Consortium gives special consideration to eligible low-income households with special needs occupants or veterans, thereby targeting assistance toward households that are especially vulnerable.

In addition, the Consortium is creating additional affordable housing through the construction of new affordable rental units. During PY16, the Consortium worked with partners to complete fifteen new rental units committed with funding prior to PY16. An additional two units from the previous year are still in progress. The Consortium has also committed new funding for the construction of two more single family rental units that are also in progress. All completed units but one have been leased to eligible tenants. The Consortium and its partners are working diligently to complete the lease up of the final unit.

These activities all serve to foster and maintain affordable housing in the Consortium area.

**Attachment 1: PY16 Match Reductions in SC**

**PY16 Match Reductions in SC**

State	Participating Jurisdiction/State	% Families in Poverty (≥14.08%)		\$PCI (<\$20,885)		% Income Growth (<3.04%)	Match Reductions	
							Fiscal Distress	Presidential Disaster
SC	Charleston	19%	Y	\$32,131			50%	
SC	Charleston County	16%		\$28,953				
SC	CNSRT-Anderson County	16%		\$22,350				
SC	CNSRT-Beaufort County	17%		\$24,471				
SC	CNSRT-Georgetown County	20%	Y	\$23,183			50%	
SC	CNSRT-Greenwood County	21%	Y	\$20,033	Y		100%	
SC	CNSRT-Orangeburg County	22%	Y	\$20,701	Y		100%	
SC	CNSRT-Sumter County	19%		\$20,086	Y		50%	
SC	Columbia	24%	Y	\$24,779			50%	
SC	Greenville	20%	Y	\$30,829			50%	
SC	Greenville County	15%		\$25,931				
SC	Lexington County	14%		\$26,766				
SC	Richland County	14%		\$25,823				
SC	South Carolina	18%		\$23,943		4.84%		
SC	Spartanburg	26%	Y	\$20,143	Y		100%	
SC	Spartanburg County	16%		\$22,689				
SC	Charleston	19%	Y	\$32,131			50%	