



COMMUNITY DEVELOPMENT DEPARTMENT

**PROGRAM YEAR 2021 ANNUAL ACTION PLAN
(DRAFT)**

(JULY 1, 2021 – JUNE 30, 2022)



Public Review Comment Period:
March 22, 2021 through April 20, 2021

Public Hearing:
April 19, 2021 @ 6:45 p.m.
Cumberland County Courthouse
117 Dick Street, Fayetteville, NC

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Executive Summary

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

1. Introduction

Cumberland County, as a designated urban county entitlement, receives annual allocations from the United States Department of Housing and Urban Development (HUD). As required by HUD, Cumberland County is required to prepare a one-year action plan which describes the proposed projects that will be funded during the Program Year / Fiscal Year. The Action Plan is also part of the 2020-2024 Consolidated Plan (5-Year Strategic Plan) which includes the priority needs and the goals and objectives Cumberland County plans to accomplish to meet the needs of the community during the five-year period. This Annual Action Plan represents the Program Year 2021 grant cycle and will be the second year of achieving the goals outlined in the Consolidated Plan. The grant cycle will begin July 1, 2021 and end June 30, 2022.

Cumberland County receives two HUD entitlement grants that are included in the Action Plan:

- Community Development Block Grant (CDBG): The purpose of the CDBG program is to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities. Projects funded through this program must meet one of three National Objectives:
 - Benefit low- and moderate-income persons;
 - Aid in the prevention or elimination of slums or blight; or
 - Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.
- Home Investment Partnerships Program (HOME): The purpose of the HOME program is to expand the supply of decent, safe, sanitary, and affordable housing for low-income persons.

Cumberland County uses other sources of funding to support the needs of the community. Through competitive grants, Cumberland County also receives Continuum of Care Program funds to support housing programs and the local Continuum of Care (CoC). The County also uses its general funds to address the needs of the homeless.

Cumberland County, through its Community Development Department, administers these programs by providing direct assistance to the residents of community or through partnerships with private and public agencies to include for-profits, nonprofits, local units of government, and other public agencies such as the local housing authority.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Cumberland County identified the following priority needs, goals, and objectives:

1. **Housing:** Improve, preserve, and expand the inventory of affordable housing for low- and moderate-income persons and families living in Cumberland County. This will be done by developing homeownership opportunities for low- and moderate-income households; expanding new affordable housing inventory for both rental and sales housing; preserving existing owner and renter occupied housing inventory; promoting fair housing choice; providing housing education to homeowners, tenants, landlords, and potential homebuyers; and providing down payment assistance and acquisition for rehabilitation to make housing affordable to low- and moderate-income persons and families.
2. **Homeless:** Improve the living conditions and support services and increase the availability of housing for homeless persons and families in Cumberland County and eliminate unfair housing practices that may lead to homelessness. The goal will be achieved by developing housing opportunities for persons and families experiencing homelessness, and those who are at-risk of becoming homeless; expanding program support services; assist in anti-eviction and prevention of unfair housing practices which may contribute to homelessness; assisting in the development of permanent supportive housing and services; and assisting in the development and operation of shelters for persons who are homeless or victims of domestic violence.
3. **Special Needs:** Improve, preserve, and expand opportunities and services for persons with special needs and the disabled in Cumberland County. This will be accomplished by increasing the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs through rehabilitation of existing housing construction of new accessible housing; assisting in supporting social service programs and facilities for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs; assisting in making accessibility improvements to owner occupied housing through rehabilitation and improve renter occupied housing by promoting reasonable accommodations for the physically disabled; and supporting and advocating for reasonable accommodations that should be made to assist the physically disabled to live in accessible housing.
4. **Community Development:** Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Cumberland County. To accomplish this goal, Cumberland County will improve infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.; improve the County's parks, recreational centers, and public and community facilities through rehabilitation, preservation, and new construction; expand public service programs

for the youth, the elderly, developmentally delayed, disabled, and target income population, including nutrition programs and social/welfare programs throughout the County; expand the public transportation system for low- and moderate-income persons and special needs; remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures; remove architectural barriers and make public community facilities accessible to all residents; improve public safety through upgrades to facilities, purchase of new equipment, crime prevention, community policing, and ability to respond to emergency situations; and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, code enforcement, and designation of an NRSA project area.

5. Economic Development: Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Cumberland County. To achieve this goal, Cumberland County will support job creation / retention, workforce development, employment, and job training services; support business retention and commercial growth through expansion and new development with technical assistance and low interest loan programs including Section 108 loans; and encourage new economic development through local, state, and Federal tax incentives and programs.
6. Administration, Planning, and Management: Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs. This goal will be accomplished by continuing to provide sound and professional planning, program management and oversight for the successful administration of Federal programs; continuing to develop and plan for special studies, environmental clearance, fair housing, Section 108 Loan Application, NRSA Plans, and compliance with all Federal, state, and local laws and regulations; and preparing a Neighborhood Revitalization Strategy Area (NRSA) Plan for the Shaw Heights Neighborhood.

3. Evaluation of past performance

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

For the Program Year 2020, Cumberland County had to shift its priorities to address the most critical needs during an unprecedented crisis our community has ever experienced. Like many communities across the United States, the COVID-19 pandemic caused many businesses to suffer an economic hardship. In addition, many residents lost employment and as a result, were facing foreclosures or evictions. Additional funding was made available from HUD through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) that was signed into law by the President on March 27, 2020 to prevent, prepare for, and respond to the coronavirus.

During the latter part of Program Year 2019 and Program Year 2020, Cumberland County used a portion of its entitlement CDBG funds and additional funds (CDBG-CV) to subcontract with nonprofits to provide emergency payments for eligible low- and moderate-income residents for rent/mortgage assistance and other services needed to address the financial hardships residents were facing. In addition, a portion of

the CDBG-CV funds were provided to small businesses. Aide was provided to the businesses in the form of a grant not to exceed \$10,000 per business. The goal of this activity was to retain jobs in the community.

CDBG and HOME entitlement funds were also designated for other activities to include housing rehabilitation, affordable housing development, public facilities, and other public services activities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Annual Action Plan will be placed at several locations within Cumberland County to solicit input from the local residents. To continue practicing social distancing during the COVID-19 pandemic, the Community Development Department scheduled a virtual public meeting to be held April 13, 2021 at 1 pm and at 6 pm. A public hearing is scheduled to be held before the Board of County Commissioners on the evening of April 19, 2021 in the County Courthouse building, located at 117 Dick Street.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of the comments will be included in the attached citizen participation comments section.

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

Public comments will be considered.

7. Summary

Cumberland County will continue to use its entitlement funding to address the goals and objectives outlined in the 2020-2024 Consolidated Plan. As our communities continue to recover from the economic hardship caused by the COVID-19 pandemic, Cumberland County will continue to provide support where it is most needed. For this Program Year, the County will make the necessary changes in its CDBG and HOME program policies and procedures to ensure flexibility and residents are able to access assistance without barriers, even if it involves creating new programs. The County will maintain strong public-private partnerships to develop affordable housing, rehab or construct public facilities and improvements, provide aide to small businesses, expand public services (human services), and address homelessness in the community.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Cumberland County	Department of Community Development
HOME Administrator	Cumberland County	Department of Community Development

Table 1 – Responsible Agencies

Narrative (optional)

Cumberland County’s Community Development Department administers the CDBG and HOME programs. The Community Development Department is responsible for preparing the Consolidated Plan, Annual Action Plans, and the Consolidated Annual and Performance Evaluation Report (CAPER). The Department is also responsible for monitoring and oversight of the programs funded through the CDBG and HOME programs.

Consolidated Plan Public Contact Information

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

1. Introduction

Cumberland County continues to work closely with our partners to identify community needs and address gaps in the services delivery system. Our community partners include local non-profits, the Fayetteville Metropolitan Housing Authority, housing providers, social service agencies, community and economic development organizations, members of the faith-based community, the Fayetteville/Cumberland County Continuum of Care on Homelessness (CoC), City of Fayetteville and County agencies, and elected officials.

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))

Cumberland County continues to work closely with the following Agencies to enhance coordination:

- **Fayetteville Metropolitan Housing Authority** – Provides funding for improvements to public housing communities.
- **Social Services Agencies** – Provides funding to improve services to low- and moderate-income persons.
- **Housing Providers** – Provides funding to rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Community and Economic Development Agencies** – Provides funding to improve services to low- and moderate-income persons.

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

The current Fayetteville/Cumberland County Continuum of Care (CoC) encompasses all of Cumberland County, including the City of Fayetteville and the Towns of Eastover, Falcon, Godwin, Hope Mills, Linden, Spring Lake, Stedman, and Wade. Cumberland County Community Development Department acts as Lead Agency/Collaborative Applicant for the CoC, providing institutional knowledge and leadership for the CoC Board and coordinating its ESG and CoC program funding. Our community has implemented a Coordinated Entry System (CES), which is currently operated by Cumberland HealthNET. The CES follows the intake, assessment, and prioritization process developed by HUD and our CoC, and makes referrals for homeless persons and persons at risk of becoming homeless within Cumberland County. During the intake process, a homeless person is evaluated with the VI-SPDAT, scored, ranked in terms of services needed, and referred to an available bed. Available beds are coordinated with providers in a by-name list meeting every other week. Our community has a large unsheltered homeless population, and the CoC has determined that the chronically homeless, disabled homeless persons, and homeless families with children are to be prioritized for housing. Due to our proximity to Fort Bragg, our community also has a large veteran population, and CES coordinates with the Veterans Administration and Volunteers of

America to house and provide services to homeless veterans. Any unaccompanied youth would be assessed and referred to appropriate housing and service providers, and providers must collaborate with local school district homeless liaisons to allow for a smooth transition to continued service and support for educational needs. The Point-in-Time Homeless Count for Sheltered and Unsheltered homeless persons is conducted on a specific date during the last week in January. Due to the COVID pandemic, the Point-In-Time Homeless Count in January 2021 was only for sheltered homeless persons. The results of the count each year are made available to the public on the Fayetteville-Cumberland County CoC website, www.fcccoc.org.

The County continues to coordinate with the CoC by developing performance standards, identifying training needs and conducting training, contributing resources to support the CoC, the HMIS system, and the CES, serving on the CoC Board and other CoC committees, and frequently engaging with our community partners.

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

Upon receiving notice of the Request for Applications from the NC Department of Health and Human Services, the County's Community Development Department forwards the information to the CoC for dissemination to the listserv, soliciting applications and further describing the process. After projects have been submitted, the CoC's grant review committee meets to review, score applicants, and determine which ESG projects are selected and allocations for each. The selected project applicant(s) must demonstrate it has the capacity and performance record to provide services to persons who are homeless or at-risk of being homeless through the eligible activities listed. The Community Development Department and the CoC provides training to grant recipients so that providers have a clear understanding of the documentation and reporting requirements.

ESG recipients are required to enter client and service information into HMIS, and submit quarterly performance reports through SAGE. The County employs a Data and Evaluation Analyst, funded through the Homeless Initiative Fund Program, who provides access, training, and technical assistance to HMIS users. The Community Development Department assists the CoC in developing policies and procedures for the operation and administration of HMIS, and the Data and Evaluation Analyst works closely with the CoC's HMIS/CE Committee to implement best practices. The County (in a joint effort with the City of Fayetteville) provides funding for the HMIS administrator (currently Michigan Coalition Against Homelessness), and licensing HMIS users in Cumberland County.

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

Cumberland County Community Development Department has ongoing consultations and discussions with our community partners. These include the agencies and organizations that participate in the CoC, as well as other service providers. Examples include:

- **Fayetteville Metropolitan Housing Authority** – Improvements to public housing communities and connecting homeless persons to public housing and Section 8 Vouchers.
- **Social Services Agencies** (Department of Social Services, Salvation Army, Action Pathways, Endeavors, Fayetteville Urban Ministry, Cumberland HealthNET, Communicare, Alliance Health, etc.) – Improve services to low- and moderate-income persons.
- **Housing Providers** (Endeavors, Family Promise, Kingdom CDC) –Rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Community and Economic Development Agencies** (Kingdom CDC, City of Fayetteville)– Improve services to low- and moderate-income persons.

1	Agency/Group/Organization	Towns of Eastover, Falcon, Godwin, Hope Mills, Linden, Spring Lake, Stedman, and Wade, Cumberland County community at large
	Agency/Group/Organization Type	Housing Services-homeless Other government - Local Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted	Include feedback and participation from citizens and local leaders. Due to COVID, a Public Notice was published in the Fayetteville Observer that a copy of the Action Plan would

<p>and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>be available for review at each municipality’s Town Hall, and on the County’s website. Town leaders can gain a better understanding of the Community Development Department programs and disseminate that information to their constituents. Further, as sites of planned or potential affordable housing, infrastructure or development efforts, many of these towns are key partners in implementation of the elements of the Action Plan.</p>
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Table 2 – Agencies, groups, organizations who participated.

Notice for the Public Review and Public Meeting was published in the Fayetteville Observer on March 10, 2021. The draft plan was available for review at the Cumberland County Community Development Department and other locations from March 22, 2021 through April 20, 2021 by appointment only. Copies of the draft plan were available for review on Cumberland County’s website at www.co.cumberland.nc.us (through the Community Development Department), or upon request, could be emailed.

All citizens of Cumberland County were invited to listen in on the public hearing that was held live on April 19, 2021 via the Cumberland County website (co.cumberland.nc.us), Facebook page (facebook.com/CumberlandNC), YouTube page ([youtube.com / user / CumberlandCountyNC / videos](https://youtube.com/user/CumberlandCountyNC)), and on Cumberland County North Carolina TV (CCNC-TV) Spectrum Cable Channel 5.

Table 2 – Agencies, groups, organizations who participated

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

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?
CoC Action Plan	Fayetteville / Cumberland County Continuum of Care on Homelessness	The goals of both plans seek to develop more housing options for homeless and low-income populations, as well as increase coordinated support services.
Connecting North Carolina State Broadband Plan	North Carolina DIT Broadband Infrastructure Office	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The County’s Community Development Department normally engages in a process of including citizen participation within the Consolidated Planning Process through a series of public meetings that is held in conjunction with town board meetings. However, in order to continue practicing social distancing during the COVID-19 pandemic, the Community Development Department determined it would benefit the community by hold a virtual public meeting in April 2021. The Department provided the public the opportunity to review and comment on the proposed Annual Action Plan through its display at 10 public locations, including government offices.

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 Meeting	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing				Not Applicable.

		Agencies/ Organizations Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations				
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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)
2.	Newspaper Ad	Minorities Persons with disabilities	None.	None.	None.	Not Applicable.

	Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations				
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Cumberland County is receiving \$890,600 in CDBG entitlement funds and \$396,328 in HOME entitlement funds for FY 2021. The County is expecting to receive \$175,624 in CDBG program income and \$300,000 in HOME Program income. The program year goes from July 1, 2021 through June 30, 2022. These funds will be used to address the following priority needs:

- Housing
- Community Development
- Public Services
- Economic Development
- Planning & Administration

The accomplishments of these projects/activities will be reported in the PY 2021 Consolidated Annual Performance and Evaluation Report (CAPER).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1	Expected Amount Available Reminder of Con Plan \$	Narrative Description
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			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$890,600	\$175,624	\$200,000	\$1,266,224	\$2,671,800	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$396,328	\$300,000	\$500,000	\$1,196,328	\$1,188,984	

General Funds	Public-local	Admin and Planning Housing	314,544	0	0	314,544	-	General funds to assist in administering programs and match funds
Other	public - local	Housing Other	200,000	0	0	200,000	-	General funds through partnership between City and County government to address homelessness.

Table 5 - Expected Resources – Priority Table

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

In addition to the entitlement funds, Cumberland County anticipates the following Federal resources may be available to local non-profit organizations to undertake the housing strategies identified in the Five Year Consolidated Plan.

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Public Housing Capital Fund Program
- Rental Assistance Demonstration (RAD)

Private and non-Federal resources that may be available to Cumberland County in PY 2021 to address needs identified in the FY 2020-2024 Five Year Consolidated Plan are listed below.

- **Cumberland Community Foundation, Inc.** – The Cumberland Community Foundation provides grants from its endowment in six areas considered to be of great need: growing philanthropy and local giving; growing sustainable support for local nonprofit organizations; increasing college access and affordability; improving education outcomes; improving quality of life for all; and strengthening local nonprofit organizations.
- **Golden LEAF Funding** – This North Carolina grant supports workforce development and disaster recovery in areas of the state of North Carolina that were once dependent on agriculture and tobacco farming.
- **Low-Income Housing Tax Credits** – The North Carolina Housing and Finance Agency administers this program for the State. The program provides Federal tax credits to owners and developers of qualified low-income rental housing. These tax credits provide incentives for private investment in affordable housing. Costs eligible under the program include acquisition, construction and rehabilitation of affordable housing.
- **Federal Home Loan Bank Affordable Housing Program (AHP)** – Congress has mandated that ten (10%) of the Federal Home Loan Bank's profits be allocated to provide affordable housing. The FHLB encourages its members to work with public agencies and non-profit housing development organizations in creating highly leveraged affordable housing initiatives. Both sales and rental housing are eligible.

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

Not applicable.

Discussion

Not applicable.

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.	HSS-6 Homeownership Assistance	2020	2024	Affordable Housing	Low- and Moderate-Income Areas Countywide-Other	Housing	CDBG: \$5,000 HOME: \$100,000	Direct Financial Assistance to Homebuyers: 5 Households Assisted Other: 1
2.	HSS-2 Housing Construction	2020	2024	Affordable Housing	Low- and Moderate-Income Areas Countywide-Other	Housing	CDBG: \$0 HOME: \$920,918 General Funds: \$99,082	Rental units constructed: 20 Household Housing Units Homeowner Housing Added: 5 Household Housing Unit
3.	HSS-3 Housing Rehabilitation	2020	2024	Affordable Housing	Countywide-Other	Housing	CDBG: \$424,514 HOME: \$120,777	Homeowner Housing Rehabilitated: 11 Household Housing Unit Rental Units Rehabilitated: 3

4.	SNS-1 Housing	2020	2024	Affordable Housing	Countywide-Other	Housing	CDBG: \$50,000 HOME: \$15,000	Homeowner Housing Rehabilitated: 4 Household Housing Unit Rental Units Rehabilitated: 1
5.	HOM-2 Operations/Support	2020	2024	Homeless	Low- and Moderate-Income Areas Countywide-Other	Homeless	CDBG: \$25,146	Public Service Activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

6.	HOM-3 Homeless Prevention	2020	2024	Homeless	Low- and Moderate- Income Areas Countywide- Other	Homeless	CDBG: \$25,147 General Funds: \$200,000	Tenant-Based Rental Assistance/Rapid Rehousing: 25 Persons Assisted Homelessness Prevention: 25 Households Assisted
7.	CDS-1 Infrastructure	2020	2024	Non-Housing Community Development	Low- and Moderate- Income Areas Countywide- Other Shaw Heights	Community Development	CDBG: \$125,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted
8.	CDS-2 Community Facilities	2020	2024	Non-Housing Community Development	Low- and Moderate- Income Areas Countywide- Other Shaw Heights	Community Development	CDBG: \$125,000	Public Facility of Infrastructure Activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9.	CDS-3 Public Services	2020	2024	Non-Housing Community Development	Low- and Moderate-Income Areas Countywide-Other	Community Development	CDBG: \$83,297	Public Service Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
9.	HSS-5 Housing Education	2020	2024	Affordable Housing	Low- and Moderate-Income Areas Countywide-Other	Housing	CDBG: \$50,000	Other: 1
10.	CDS-5 Clearance	2020	2024	Non-Housing Community Development	Low- and Moderate-Income Areas Countywide-Other	Community Development	CDBG: \$50,000	Buildings Demolished: 3 Buildings Other: 1
11.	EDS-1 Employment	2020	2024	Non-Housing Community Development	Low- and Moderate-Income Areas Countywide-Other	Economic Development	CDBG: \$100,000	Jobs Created/Retained: 5
12.	EDS-2 Financial Assistance	2020	2024	Non-Housing Community Development	Low- and Moderate-Income Areas Countywide-Other	Economic Development	CDBG: \$25,000	Businesses Assisted: 1

13.	APM-1 Management APM-2 Planning	2020	2024	Administration	Low- and Moderate-Income Areas Countywide-Other Shaw Heights	Administration, Planning, and Management	CDBG: \$178,120 HOME: \$39,633 General Funds: \$215,462	Other: 2
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Table 6 – Goals Summary

Goal Descriptions

1.	Goal Name	HSS-6 Housing Purchase
	Goal Description	Provide funds for down payment assistance and acquisition for rehabilitation to make housing affordable to low- and moderate-income persons and families.
2.	Goal Name	HSS-2 Housing Construction
	Goal Description	Promote and assist in the development of new affordable housing inventory for both rental and sales housing.
3.	Goal Name	HSS-3 Housing Rehabilitation
	Goal Description	Promote and assist in the preservation of existing owner and renter occupied housing inventory in Cumberland County.
4.	Goal Name	SNS-1 Housing
	Goal Description	Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs through rehabilitation of existing housing and construction of new accessible housing.
5.	Goal Name	HOM-2 Operations/Support
	Goal Description	Promote and assist in program support services for the homeless.
6.	Goal Name	HOM-3 Homeless Prevention
	Goal Description	Promote and assist in anti-eviction and prevention of unfair housing practices which may contribute to homelessness.
7.	Goal Name	CDS-1 Infrastructure

	Goal Description	Improve the County's infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.
8.	Goal Name	CDS-5 Clearance and Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the County.
	Goal Name	CDS-2 Community Facilities
	Goal Description	Improve the County's parks, recreational centers, and public and community facilities through rehabilitation, preservation, and new construction.
9.	Goal Name	CDS-3 Public Services
	Goal Description	Improve and increase public service programs for the youth, the elderly, developmentally delayed, disabled, and target income population, including nutrition programs and social/welfare programs throughout the County.
10.	Goal Name	HSS-5 Housing Education
	Goal Description	Promote and assist in educating homeowners, tenants, landlords, and new homebuyers in best practices for purchase and maintenance of affordable housing rentals, including foreclosure and eviction prevention.
11.	Goal Name	EDS-1 Employment
	Goal Description	Support and encourage new job creation, job retention, workforce development, employment, and job training services.
	Goal Name	EDS-2 Financial Assistance
12.	Goal Description	Support business retention and commercial growth through expansion and new development with technical assistance and low interest loan programs including Section 108 loans.

13.	Goal Name	APM-1 Management
	Goal Description	Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal programs.
14.	Goal Name	APM-2 Planning
	Goal Description	Continue to develop and plan for special studies, environmental clearance, fair housing, Section 108 Loan Application, NRSA Plans, and compliance with all Federal, state, and local laws and regulations.

Projects

AP-35 Projects – 91.220(d)

Introduction

All projects in Cumberland County are determined based on the HUD CDBG and HOME allocations, as well as the County's goals and objectives.

Projects

#	Project Name	Budget
1.	HOUSING REHABILITATION	CDBG: \$ 245,844 HOME: \$135,777
2.	AFFORDABLE HOUSING (2019)	CDBG: \$ 50,000 HOME: \$920,918
3.	HOMEOWNERSHIP ASSISTANCE	CDBG: \$5,000 HOME: \$100,000
4.	HOUSING PROJECT DELIVERY	CDBG: \$228,670
5.	PUBLIC SERVICES	CDBG: \$83,297
6.	HOMELESS SERVICES	CDBG: \$50,293
7.	PUBLIC FACILITIES / INFRASTRUCTURE	CDBG: \$250,000
8.	CLEARANCE / DEMOLITION	CDBG: \$50,000
9.	ECONOMIC DEVELOPMENT	CDBG: \$125,000
10.	GENERAL ADMINISTRATION / PLANNING	CDBG: \$178,120 HOME: \$39,633

Table 7 - Project Information

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

Cumberland County has allocated its CDBG funds for PY 2021 to principally benefit low-

and moderate- income persons.

- The infrastructure improvement activities are either located in a low- and moderate-income census tract/block group or have a low- and moderate-income service area benefit or clientele over 51% low- and moderate-income.
- The Public Facilities activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele.

Areas with multiple housing problems are concentrated in the block groups that are greater than 51% Low- and Moderate-Income. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 001400 B.G. 1
- C.T. 001603 B.G. 1
- C.T. 001604 B.G. 2
- C.T. 001700 B.G. 1
- C.T. 001700 B.G. 3
- C.T. 000200 B.G. 3
- C.T. 002401 B.G. 1
- C.T. 002402 B.G. 1
- C.T. 002504 B.G. 1
- C.T. 003500 B.G. 1
- C.T. 003500 B.G. 2
- C.T. 003500 B.G. 3
- C.T. 003500 B.G. 2
- C.T. 003600 B.G. 3

Additionally, Cumberland County is designated as an “exception” community by HUD. Any Block Groups below the County’s designated “exception” level of 50.76% low- and moderate-income is also eligible for the use of CDBG funds. The following Census Tracts and Block Groups are eligible based on exception criteria:

- C.T. 001100 B.G. 1
- C.T. 001700 B.G. 2
- C.T. 003104 B.G. 3

AP-38 Project Summary

Project Summary Information

1.	Project Name	HOUSING REHABILITATION
	Target Area	Low- and Moderate-Income Areas Countywide-Other
	Goals Supported	HSS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: \$245,844 HOME: \$135,777
	Description	Funds provided for housing repairs through the following programs: Owner-occupied rehabilitation; Investor-owner (rental) rehabilitation); and Purchase/Rehab/Resale. All programs must benefit homeowners or renters with incomes 80% or below the median income for Cumberland County. Housing Rehabilitation program was expanded to address disaster housing repairs to eligible homeowners in Cumberland County's jurisdiction.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	5 Rental Units Rehabilitated. 15 Homeowner Housing Units Rehabilitated
	Location Description	County-wide
	Planned Activities	The national objective is Low/Mod-Income Housing. The Matrix Code is 14A Rehabilitation; Single-Unit Residential.
2.	Project Name	AFFORDABLE HOUSING DEVELOPMENT (2019)
	Target Area	Low- and Moderate-Income Areas Countywide-Other
	Goals Supported	HSS-2 Housing Construction HSS-5 Housing Education
	Needs Addressed	Housing Priority

	Funding	CDBG: \$50,000 HOME: \$920,918
	Description	Funds will be used to assist CHDOs, CBDOs, and developers with the development of affordable housing for low and moderate-income residents of Cumberland County. HOME Funds provided under this activity represent at least 15% of the HOME entitlement mandated for affordable housing development by CHDOs. In addition, funds will be used to provide housing education / counseling to potential homebuyers, renters, and landlords.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 20 Household Housing Units Homeowner Housing Added: 5 Household Housing Unit 1 Other
	Location Description	County-wide
	Planned Activities	The national objective is Low/Mod-Income Housing. The Matrix Code is 12 Construction of Housing.
3.	Project Name	HOMEOWNERSHIP ASSISTANCE
	Target Area	Low- and Moderate-Income Areas Countywide-Other
	Goals Supported	HSS-6 Housing Purchase
	Needs Addressed	Housing Priority
	Funding	CDBG: \$5,000 HOME: \$100,000
	Description	Assistance will be provided to potential home buyers for down payment and/or closing costs and GAP financing. Housing counseling will be provided to increased knowledge and resources related to purchasing a home
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	5 Households Assisted. 1 Other.
	Location Description	County-wide
	Planned Activities	The national objective is Low/Mod-Income Housing. The Matrix Code is 05R Homebuyer Down payment Assistance – Excluding Housing Counseling, under 24 CFR 5.100.
4.	Project Name	HOUSING PROJECT DELIVERY
	Target Area	Countywide-Other
	Goals Supported	HSS-3 Housing Rehabilitation HSS-5 Housing Education
	Needs Addressed	Housing Priority
	Funding	CDBG: \$228,670
	Description	Staff and overhead costs directly related to carrying out housing projects, such as work specification preparation, loan process, inspections, and other housing-related services. In addition, funds will be used to provide housing counseling services to potential homebuyers, tenants, and landlords.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	1 Other. 10 Households
	Location Description	707 Executive Place, Fayetteville, NC 28305
	Planned Activities	The national objective is Low/Mod-Income Housing. The Matrix Code is 14H Rehabilitation: Administration.
	Project Name	PUBLIC SERVICES
	Target Area	Low- and Moderate-Income Areas Countywide-Other
	Goals Supported	CDS-3 Public Services

5.	Needs Addressed	Housing Priority Community Development Priority
	Funding	CDBG: \$83,297
	Description	Partner with agencies in providing social services programs. Staff and overhead costs directly related to carrying out public services activities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	100 Persons Assisted.
	Location Description	County-wide 707 Executive Place, Fayetteville, NC 28305
	Planned Activities	The national objective is Low/Mod-Income Clientele (LMC). The Matrix Codes are: 13A Housing Counseling, under 25 CFR 5.100, for Homeownership Assistance (13B); 05Z Other Public Services Not Listed in 03T and 05A-05Y.
6.	Project Name	HOMELESS SERVICES
	Target Area	Countywide-Other
	Goals Supported	HOM-2 Operations/Support HOM-3 Homeless Prevention
	Needs Addressed	Homeless Priority
	Funding	CDBG: \$50,293 General Funds: \$200,000
	Description	Activities to benefit homeless persons to help prevent homelessness and to reduce homeless population. This activity will also be leveraged with local government funds of as a part of the joint city/county homeless initiative program. A portion of the local government funds will also be used to support the local HMIS and Data and Evaluation Analyst position.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	100 Persons assisted.
	Location Description	County-wide
	Planned Activities	The national objective is Low/Mod-Income Clientele (LMC). The Matrix Codes are: 03T Homeless/AIDS Patients Programs; 05S Rental Housing Subsidies; and 05 Public Services.
7.	Project Name	PUBLIC FACILITIES / INFRASTRUCTURE
	Target Area	Low- and Moderate-Income Areas Shaw Heights
	Goals Supported	CDS-1 Infrastructure CDS-2 Community Facilities
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$250,000
	Description	Funding provided to make public facilities/infrastructure available for low- to moderate- income citizens of Cumberland County.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 Households Assisted. 40 Persons Assisted
	Location Description	TBD
	Planned Activities	The national objective is Low/Mod-Income Area Benefit (LMA). The Matrix Codes are: 03E Neighborhood Facilities; 03J Water/Sewer Improvements; 03K Street Improvements.
	Project Name	CLEARANCE / DEMOLITION

8.	Target Area	Low- and Moderate-Income Areas Shaw Heights
	Goals Supported	CDS-4 Clearance and Demolition
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$50,000
	Description	Funding provided for clearance and demolition of buildings/improvements to eliminate slum / blighted areas.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	1 Building
	Location Description	County-wide
Planned Activities	The national objective is Low/Mod-Income Area Benefit (LMA). The Matrix Codes are: 04 Clearance and Demolition	
9.	Project Name	ECONOMIC DEVELOPMENT
	Target Area	Low- and Moderate-Income Areas Countywide-Other
	Goals Supported	EDS-1 Employment EDS-2 Financial Assistance
	Needs Addressed	Economic Development Priority
	Funding	CDBG: \$125,000
	Description	CDBG funding will be provided to increase the number of new private sector jobs and expand job training opportunities to low- and moderate-income residents of Cumberland County.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 Jobs 1 Business Assisted
Location Description	707 Executive Place, Fayetteville, NC 28305	

	Planned Activities	The national objective is Low/Mod-Income Clientele (LMC). The Matrix Code is 18A Economic Development Direct Financial Assistance to For-Profit Businesses.
10.	Project Name	GENERAL ADMINISTRATION / PLANNING
	Target Area	Countywide-Other
	Goals Supported	APM-1 Administration APM-2 Planning
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: \$178,120 HOME: \$39,633 General Funds: \$215,462
	Description	CDBG funding will be provided to support administrative cost associated with carrying out the 2021 Action Plan Goals and Priority needs. Local government funds will also be used to help support this activity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	2 Other.
	Location Description	707 Executive Place, Fayetteville, NC 28305
	Planned Activities	The Matrix Code is 21A General Program Administration.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

Target Area	Percentage of Funds
Low- and Moderate-Income Areas	42.9%
Countywide-Other	50.0%
Shaw Heights	7.1%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Areas with multiple housing problems are concentrated in the block groups that are greater than 51% Low- and Moderate-Income. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- ☐ C.T. 001400 B.G. 1
- ☐ C.T. 001603 B.G. 1
- ☐ C.T. 001604 B.G. 2
- ☐ C.T. 001700 B.G. 1
- ☐ C.T. 001700 B.G. 3
- ☐ C.T. 000200 B.G. 3
- ☐ C.T. 002401 B.G. 1
- ☐ C.T. 002402 B.G. 1
- ☐ C.T. 002504 B.G. 1
- ☐ C.T. 003500 B.G. 1
- ☐ C.T. 003500 B.G. 2
- ☐ C.T. 003500 B.G. 3
- ☐ C.T. 003500 B.G. 2
- ☐ C.T. 003600 B.G. 3

Additionally, Cumberland County is designated as an “exception” community by HUD. Any Block Groups below the County’s designated “exception” level of 50.76% low- and moderate-income is also eligible for the use of CDBG funds. The following Census Tracts and Block Groups are eligible based on exception criteria:

- ☐ C.T. 001100 B.G. 1

☐ C.T. 001700 B.G. 2

☐ C.T. 003104 B.G. 3

Discussion

The geographic locations and the public benefit for the FY 2021 CDBG and HOME Activities/Projects are as follows:

- ☐ **HOUSING REHABILITATION** – Low- and Moderate-Income Areas; Countywide-Other
- ☐ **AFFORDABLE HOUSING DEVELOPMENT** – Low- and Moderate-Income Areas
- ☐ **HOMEOWNERSHIP ASSISTANCE** – Low- and Moderate-Income Areas; Countywide-Other
- ☐ **HOUSING PROJECT DELIVERY** – Countywide-Other
- ☐ **PUBLIC SERVICES** – Low- and Moderate-Income Areas; Countywide-Other
- ☐ **HOMELESS SERVICES** – Countywide-Other
- ☐ **PUBLIC FACILITIES / INFRASTRUCTURE** – Low- and Moderate-Income Areas; Shaw Heights
- ☐ **ECONOMIC DEVELOPMENT** – Low- and Moderate-Income Areas; Countywide-Other
- ☐ **GENERAL ADMINISTRATION / PLANNING** – Countywide-Other

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	100
Non-Homeless	135
Special-Needs	5
Total	

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	20
Rehab of Existing Units	20
Acquisition of Existing Units	5
Total	

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

Discussion

During this program year the County is funding the following affordable housing projects/activities with CDBG and HOME funds:

- **HOUSING REHABILITATION** – 20 housing units
- **AFFORDABLE HOUSING DEVELOPMENT (2019)** – 20 new housing units
- **HOMELESS SERVICES** – 100 households
- **PUBLIC FACILITIES / INFRASTRUCTURE** – 50 households

Additionally, the County is funding two programs that assist with low- and moderate-income homeownership, which are not included in the above chart:

- **HOMEOWNERSHIP ASSISTANCE** – 5 households
- **PUBLIC SERVICES** – 100 households

AP-60 Public Housing – 91.220(h)

Introduction

Cumberland County does not own or operate public housing units but will continue to partner with the Fayetteville Metropolitan Housing Authority (FMHA) and other agencies to address the needs of affordable housing availability.

Fayetteville Metropolitan Housing Authority's mission is to meet its community's housing needs by providing decent, safe and affordable housing. It is the goal of the Housing Authority to promote self-sufficiency, personal growth and neighborhood revitalization by maximizing its resources and maintaining the fiscal veracity of the agency. It is FMHA's belief that housing is a basic right and the substance for a successful life. The Housing Authority staff are committed to serving the Fayetteville community in a manner that demonstrates professionalism, care and consideration. Because the Fayetteville Metropolitan Housing Authority receives applications from all over the United States (due to the presence of Fort Bragg and the large number of people moving to the area for military service), FMHA rarely accepts applications.

Fayetteville Metropolitan Housing Authority is rated as a "high performer" by HUD. Fayetteville Metropolitan Housing Authority owns and professionally manages ten (10) family communities and elderly/disabled rental apartments. Within these communities are 1,045 public housing units. The Housing Authority is currently working on the development of a 272 unit public housing community on Grove Street. Additionally, one 52 unit structure is undergoing the RAD conversion process, and an additional 32 unit structure has gone through RAD conversion.

The waiting list for public housing is currently open, and is open indefinitely. The breakdown of the waiting list is 61.3% single-person households, 34.7% two-person households, 3.5% three-person households, 0.8% four-person households, and 0.5% five-person or greater households, for a total of 354 households on the waiting list as of January 9, 2020 (the last waiting list available). With public housing occupancy at 98%, there is a greater demand than supply. However, public housing residents have been converting to Section 8, and demand for public housing has decreased among households who qualify for Section 8.

Fayetteville Metropolitan Housing Authority does not have any homebuyer programs for residents. FHMA has a Family Self-Sufficiency program, a resident services program, and a Step Up to Work program where they average two (2) participants per year. FMHA also has a pilot program for tax forgiveness.

The Fayetteville Metropolitan Housing Authority administers 1,749 Section 8 Housing Choice Vouchers as of October 15, 2019, as well as an additional 223 VASH vouchers. A total of 1,714 of these vouchers are living in Section 8 Housing. Demand for a quality Section 8 Housing rental exceeds the supply of decent, affordable rental units. Section 8 Housing is currently at 98% occupancy. There were 218 families/individuals on the Housing Choice Voucher waiting list as of January 9, 2020 (the last waiting list available). The waiting list is currently closed.

The FMHA and the City of Fayetteville have been awarded a \$450,000 HUD Choice Neighborhood Program grant, which will be used to preserve and create new affordable and mixed-income housing in the Murchison Road Corridor. The FMHA and the City plan to apply for a \$30 million Choice Neighborhood implementation grant to continue to revitalize this area.

The County has used CDBG and HOME funds in the past to provide funding for the development of new affordable housing units and will continue to look for new ways to partner.

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

The Fayetteville Metropolitan Housing Authority has determined the needs for its properties through interviews with its Resident Advisory Board. The FMHA has completed its Five Year Plan for its FY 2019 through FY 2023 Public Housing Capital Fund Program Grant, and submitted its complete Five Year Plan for FY 2019-2023 in Summer of 2019.

The Housing Authority has constructed just over 270 units in Grove View Terrace and 32 units in Hillside Manor for RAD conversion. In addition to the RAD conversion, the Housing Authority will replace the units with 56 tax credit units in conjunction with the 270 RAD units.

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

According to the Five Year and Annual Plan for 2019-2023, FMHA's progress in meeting their mission and goals states that FMHA set the goal of cooperating with Cumberland County, the City of Fayetteville, and other neighborhood partners to promote neighborhood revitalization and economic development in designated areas of the City. FMHA has an active resident council that expresses needs for all public housing communities under the Fayetteville Metropolitan Housing Authority. The Resident Advisory Board has actively contributed to the FMHA's 2019-2023 Five Year and Annual Plans.

Section 8 Voucher Holders have the opportunity to plan and reach goals that they set for themselves and their families, as well as save a significant amount of money. This opportunity is available to Section 8 holders who choose to become participants in Section 8's Family Self-Sufficiency Program. There are two parts to the program. The first part of the program is the Self-Sufficiency program where participants have the opportunity to work toward meeting its goals that they set for their families, as well as save money that will become theirs when they have completed their goals. The second part of the program is the Homeownership Program. In this part of the program, a Section 8 participant can choose to use his or her Section 8 voucher to assist with the purchase and payment of a home. Each part of the Self-Sufficiency program is detailed below.

Family Self-Sufficiency (FSS) is a voluntary HUD program that encourages and assists families to become self-

sufficient. Anyone currently on the Section 8 Housing Choice Voucher program is eligible for this program. FSS offers a financial incentive to families through an escrow account, which is based on an increase in a families earned income.

Fayetteville Metropolitan Housing Authority conducts various workshops and activities that promote self-sufficiency and economic independence. Efforts are put forth in developing partnerships to educate tenants on the process of purchasing a home to prepare them for future homeownership.

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

Not applicable. Fayetteville Metropolitan Housing Authority has been designated a high performing housing authority.

Discussion

The Fayetteville Metropolitan Housing Authority is continuing to meet its goals by securing funding through RAD conversion, development of Section 8 Project-Based Voucher Developments, and revitalization of its existing units.

The Fayetteville Metropolitan Housing Authority will be partnering with the City of Fayetteville in its pursuit of a Choice Neighborhoods Initiative Grant for the Murchison Road Corridor.

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

Introduction

Cumberland County continues to engage and support our local and regional partners to reduce homelessness within Cumberland County, as outlined in the 2020-2024 Five-Year Consolidated Plan. The Homelessness Strategy includes increasing our affordable housing supply, developing more permanent supportive housing and emergency shelter housing, improving access to support services, and assisting persons who may be at risk of becoming homeless through prevention services.

According to the 2020 Point-in-Time count, 297 individuals experienced homelessness on a single night in January in Cumberland County, with 38 individuals residing in Emergency Shelters, 94 individuals residing in transitional housing, and 165 individuals living in unsheltered conditions.

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

Continuum of Care and Coordinated Entry

The County supports outreach services by partnering with our nonprofit and faith-based homelessness assistance providers. Cumberland County Community Development (CCCD) serves as the Lead Agency for the Fayetteville/Cumberland County Continuum of Care (CoC) on Homelessness, with the Director serving as an *Ex-officio* Board Member. The County has also employed a CoC Coordinator to assist the CoC Board in its mission of making homelessness rare, brief, and non-recurring.

The County will continue to work closely with the CoC to facilitate the coordination of the community's human services agencies, including the operation of our Coordinated Entry System, which is administered by Cumberland HealthNET. Through Coordinated Entry, our community supports a Housing First model, and uses standardized assessment, prioritization, and referral strategies at multiple access points to connect our homeless population with housing and services.

Emergency Services Grants

The CCCD serves as the Lead Agency for contracts awarded via the Emergency Services Grant (ESG), and coordinates with the CoC to conduct grant reviews and submit our Regional Application. The Salvation Army was awarded a Street Outreach grant in 2020 and will connect our unsheltered homeless population with emergency shelter, human services, and housing opportunities.

Homeless Initiative Fund

The County and City of Fayetteville have collaborated in a joint venture project, the Homeless Initiative Fund Program, whereby each local government contributes an agreed-upon amount from their General Funds to address any gaps in services for homeless individuals that may not qualify for federally funded programs. Through this initiative, the County will continue to serve homeless or at-risk persons who are at

or below 80% of the area median income by providing direct financial assistance and support services, including rent and utility payments and deposits.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelters

The County will continue to allocate CDBG funds to support our homeless shelter providers, as well as serve as the Lead Agency for the Emergency Services Grant. The Salvation Army and the Care Center Family Violence Program both operate Emergency Shelters for families, each of which receive ESG and CDBG funding. The Hope Center had in the past been used as a women’s shelter, but due to a loss of volunteers and staff during the COVID-19 pandemic, the shelter closed and is now being operated as a “White Flag” shelter by the Salvation Army. Cumberland County homeless shelters are located predominantly in downtown Fayetteville, where there is a concentration of low- and moderate-income populations.

Due to the COVID-19 pandemic, our shelters have been challenged to provide the same number of beds while following CDC guidelines regarding social distancing. To address this problem, homeless individuals are being housed in local motels with funding from FEMA, federal grants, and the Homeless Initiative Program. The County will continue to work with our community partners and local motels to house our homeless population while the COVID-19 guidelines are in place.

Cumberland County has a high population of veterans due to the presence of Ft. Bragg, and several organizations in the region target our homeless veteran population. The Salvation Army has beds designated for veterans. Volunteers of America works with the Veterans Administration and our Coordinated Entry System to provide housing and employment training, with a focus on female homeless veterans. Veteran Services of the Carolinas serves veterans in Cumberland County through the Homeless Veterans Reintegration Program (HVRP) grant, helping homeless veterans who need assistance to enter, re-enter, remain, or advance in the workforce.

Transitional Housing

The County operates a Transitional Housing program called Robin’s Meadow and partners with Coordinated Entry and domestic violence shelters to house families who are literally homeless or fleeing domestic violence. This program allows families to reside in an apartment for 12 months while they apply for permanent housing and address any barriers that may prevent them from acceptance into permanent housing, including unemployment, substance abuse, bad credit, or criminal history. Robin’s Meadow served approximately 15 families in the 2020 program year, and the County anticipates the same in 2021.

The County will participate in the PATH program and enter into a Memorandum of Understanding with

Communicare, Inc. for the 2021 Program Year to provide services to homeless individuals with severe mental illness.

Additional programs have been created to address those displaced by Hurricane Florence, which is run through the Back at Home Program for disaster relief and administered by Volunteers of America. The County is developing a project to build new townhomes at the Robin's Meadow location for displaced persons to utilize in the event of future disasters.

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

Rapid Rehousing

The County will continue to work closely with the City and community partners of the FCCoC to help homeless individuals and families make the transition from homelessness to permanent housing. The Coordinated Entry System evaluates individuals when they present themselves, then will be directed toward the emergency shelter, transitional housing, or permanent supportive housing facilities that will best meet their needs. Cumberland County, along with the State of North Carolina, has prioritized expanding our rapid rehousing programs, and a lack of suitable landlords has been identified as a barrier to quickly housing our homeless population. The County will increase efforts to recruit landlords with incentives, including down payments, extra rental payments, and repair costs.

Permanent Supportive Housing

Cumberland County has also identified a need for additional permanent supportive housing. According to care providers, approximately 20% of the homeless people in the area require more substantive services. These services could be provided through additional permanent supportive housing. Many of the organizations associated with the FCCoC focus on providing additional services to complement housing services. These services include job training, health services, and case management.

Increasing affordable housing

Cumberland County has partnered with Kingdom Community Development Corporation to develop affordable housing units in the Town of Spring Lake, using CDBG and HOME funds for acquisition, infrastructure, and construction. This will be a multi-year project, and construction should begin this year. The County has also allocated CDBG funding for the Fayetteville Metropolitan Housing Authority's Hillside

Manor project, to replace the HVAC system for a facility that provides affordable housing to seniors.

Public Services

The County allocates CDBG funding each year for public services, with The Salvation Army, Cumberland County Medication Access Program, Better Health of Cumberland County, Cumberland HealthNET, and Fayetteville Urban Ministry receiving funding for the 2020 Program Year. These organizations provide health and medication services, financial assistance to homeless individuals, and other supportive services. The County will continue to allocate CDBG funding for Public Service Programs to community partners for Program Year 2021.

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.

Prevention Services

For Program Year 2021, the County will continue to allocate funding to community partners for prevention services and direct financial assistance; previous recipients include Endeavors, Fayetteville Urban Ministry, and Kingdom CDC. Additionally, the County and City of Fayetteville are collaborating to distribute federal funding received from the Treasury Department and will begin jointly implementing the Emergency Rental Assistance Program (ERAP) in early Spring, 2021.

The County will continue to work with the City, the FCCCoC, and other community partners to identify and address any gaps in service that may occur due to discharge from institutions and systems of care. Increasing the regular participation of representatives from these facilities in the FCCCoC will be a goal for Program Year 2021.

Cumberland County Department of Social Services provides a variety of services to low-income people to provide them with support and help them maintain stability. These services target populations that have a significant amount of crossover with homeless populations, such as addiction and mental health services.

Discussion

Not Applicable.

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

Introduction:

The City of Fayetteville’s and Cumberland County’s 2020 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing in the City and County:

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

Impediment 1: Fair Housing Education and Outreach - There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Goal: Improve the public’s and local officials’ knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing throughout the City of Fayetteville and Cumberland County.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **1-A:** Continue to promote Fair Housing awareness through the media, hosting seminars, and training to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and Americans with Disabilities Act.
- **1-B:** Continue to prepare and distribute literature and informational material concerning fair housing issues, an individual’s housing rights, and a landlord’s responsibilities to comply with the Fair Housing Act by making reasonable accommodations.
- **1-C:** Educate residents that they have the right to live outside concentrated areas of poverty.
- **1-D:** Work with the local Board of Realtors to educate and promote fair housing.
- **1-E:** Strive for better intergovernmental cooperation between state and local partners, as well as community groups, to effectively identify and address potential barriers to affordable housing choice.
- **1-F:** Publish forms, informational material, etc. in both English and Spanish.

Impediment 2: Quality of Rental Housing vs. Affordability - The City of Fayetteville and Cumberland County have a large supply of rental housing that does not meet the minimum property standards and 35.9% of all households are cost overburdened and spend 30% or more of their monthly income on housing.

Goal: Increase the supply of decent, safe, sound and affordable rental housing through new construction and rehabilitation.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of

Fayetteville and Cumberland County:

- **2-A:** Provide funding and incentives for the rehabilitation of rental housing for low- and moderate-income renters.
- **2-B:** Continue to enforce local codes and ordinances, and develop a Rental Registry Program in the City of Fayetteville and Cumberland County.
- **2-C:** Promote and encourage the Public Housing Authority to offer Section 8 Housing Choice Voucher holders the option to convert to homeownership.
- **2-D:** Continue to support Low Income Housing Tax Credit applications to develop decent, safe, sound and affordable rental housing.
- **2-E:** Target and rehabilitate rental housing in the Murchison Road Corridor and Shaw Heights Neighborhood Revitalization Strategy Areas.

Impediment 3: Lack of Quality Affordable Homeowner Housing - There is a lack of housing resources for low- and moderate-income households to purchase a home. Many houses that are available for purchase are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing for sale through new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **3-A:** Financially support and assist low- and moderate-income households to purchase homes at affordable prices throughout Cumberland County.
- **3-B:** Support and promote the development of affordable infill housing on vacant land.
- **3-C:** Continue to fund and support homeowner rehabilitation and emergency repair programs.
- **3-D:** Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **3-E:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas that are not low-moderate income.
- **3-F:** Target and rehabilitate homeowner-occupied housing in the Murchison Road Corridor in Fayetteville and the Shaw Heights Neighborhood in Cumberland County.

Impediment 4: Continuing Need for Accessible Housing Units - As an older built-up environment, there is a lack of accessible housing units in the City of Fayetteville and Cumberland County. 21.9% of the County's housing units (including the City of Fayetteville) were built over 60 years ago and do not have accessibility features, while 16.6% of the County's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **4-A:** Promote programs to increase the amount of accessible housing through rehabilitation of existing housing stock by homeowners and landlords.
- **4-B:** Encourage the development of new construction of accessible and visitable housing through financial or development incentives.
- **4-C:** Continue to enforce ADA and Fair Housing requirements for landlords to make “reasonable accommodations” for tenants who are disabled.
- **4-D:** Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

Impediment 5: Economic Issues Affecting Housing Choice - There is a lack of economic opportunities in the City of Fayetteville and Cumberland County which prevents low-income households from increasing their financial resources to be able to choose to live outside areas of concentrated poverty.

Goal: The local economy will continue to improve by providing new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **5-A:** Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- **5-B:** Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- **5-C:** Continue to support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income, and minority neighborhoods.
- **5-D:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-E:** Support and enhance entrepreneurship training programs, with a particularly focus on programs that assist women, minority, and veteran-owned businesses.

Impediment 6: Impacted Areas of Concentration - There are specific high poverty, racially segregated areas throughout the City of Fayetteville and Cumberland County where the concentration of low- income minority persons exceeds 70% of the area’s corresponding population.

Goal: Promote the de-concentration of minorities outside the Central and Northern sections of the City of Fayetteville and areas of the County bordering Fort Bragg in order to reduce minority concentration.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **6-A:** Support, promote, and plan for affordable housing developments outside areas of minority concentration.
- **6-B:** Market and promote housing opportunities for minorities outside areas of minority concentration.
- **6-C:** Provide assistance to minority households to locate their residences outside areas of high minority concentration.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The community will use funding from various available resources to expand affordable housing units for low- to moderate- income persons. Partnering agencies within the community will continue to apply for funding through the State Emergency Solutions Grant program and other funding sources to help alleviate some of the problems with the homeless population.

Cumberland County has developed the following actions planned to: address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle in meeting underserved needs is the lack of funding resources available for affordable housing targeted to very low, low to moderate income persons and housing for the homeless with comprehensive case management and support services. Through the Fayetteville / Cumberland County Continuum of Care on Homelessness network, improvements are being made on how services are coordinated in the community. This process helps prioritize the needs of those who are the most vulnerable in the community and ensures this population is able to access services.

The community will use funding from various available resources to expand affordable housing units for low- to moderate- income persons. Partnering agencies within the community will continue to apply for funding through the State Emergency Solutions Grant program and other funding sources to help alleviate some of the problems with the homeless population.

Despite efforts made by Cumberland County and social service providers, a number of significant obstacles remain to meeting underserved needs. With funding resources being scarce, funding becomes the greatest obstacle for Cumberland County to meet its underserved needs. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, and agencies. Through its planning efforts, the County will use its limited resources to address Cumberland County's greatest needs and improve the quality of life for its residents. The following obstacles need to be overcome in order to meet underserved needs:

- Lack of decent, safe, sound, and affordable owner and renter housing.
- The transition of owner-occupied housing into renter-occupied housing.
- Aging in place population who need accessibility improvements.
- Need major rehabilitation of the County's aging housing stock.
- The increasing number of vacant and abandoned properties.
- Low wages in the service and retail sector job market.
- Vacant and abandoned buildings in major commercial corridors.

Actions planned to foster and maintain affordable housing

To foster and maintain affordable housing, Cumberland County proposes the following Five-Year Goals and Strategies:

- **HSS-1 Homeownership Assistance** - Promote and assist in developing homeownership opportunities for low- and moderate-income households.
- **HSS-2 Housing Construction** - Promote and assist in the development of new affordable housing inventory for both rental and sales housing.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing inventory in Cumberland County.
- **HSS-4 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Cumberland County.
- **HSS-5 Housing Education** - Promote and assist in educating homeowners, tenants, landlords, and new homebuyers in best practices for purchase and maintenance of affordable housing rentals, including foreclosure and eviction prevention.
- **HSS-6 Housing Purchase** - Provide funds for down payment assistance and acquisition for rehabilitation to make housing affordable to low- and moderate-income persons and families.

Cumberland County Community Development will continue to encourage developers that seek funding through the department, to set aside a certain percentage of developed units for households with incomes at or below 30% of the area median income. Cumberland County intends to reprogram previous year's CDBG and HOME funds into housing construction and housing rehabilitation to meet the need for affordable housing. Cumberland County is designating a Neighborhood Revitalization Strategy Area in the Shaw Heights Neighborhood, and will be targeting resources for infrastructure development in this area, followed by housing development and rehabilitation.

Cumberland County will continue to work with the Fayetteville-Cumberland County Human Relations Commission during this program year to again provide education and outreach.

Actions planned to reduce lead-based paint hazards

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant based rental assistance, and property acquisition – supported by the CDBG and HOME programs. Cumberland County will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

For any housing rehabilitation program using Federal funds, Cumberland County will ensure that:

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- A pre-test is conducted for rehabilitation activities in housing units built before 1978 with occupants with children.
 - A post-test is conducted for rehabilitation activities in housing units built before 1978 without children.
 - Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
 - Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
 - The level of federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
 - Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
 - Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
 - Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
 - Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
 - Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
 - The contractor handbook includes guidelines prohibiting the use of lead-based paints in new construction and citing safety regulation 40 CFR Part 745 for housing rehabilitation.

Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

In addition, The Community Development Department's housing rehabilitation staff will continue to receive training to implement lead-based paint safe work practices. Actions taken include implementation of lead-based paint hazard reduction measures as part of our housing rehabilitation program to comply with 24 CFR 35; contractors who rehabilitate homes built prior to 1978 are required to attend Safe Work Practices training for lead-based paint; staff persons are trained in the new HUD/EPA regulations that require contractors to use safe work practices to mitigate lead-based paint hazards in private homes and childcare centers; and distribution of the brochure to all housing rehabilitation program applicants on the hazards of lead-based paint ("The Lead-Safe Certified Guide To Renovate Right").

Actions planned to reduce the number of poverty-level families

According to the 2013-2017 American Community Survey, approximately 18.2% of Cumberland County's

residents live in poverty, which is higher than the State of North Carolina where 16.1% of residents live in poverty. Female-headed households with children are more affected by poverty at 45.4%. Youth poverty is an acute problem in Cumberland County, as 26.5% of all youth under the age of 18 were living in poverty.

The County's anti-poverty strategy is based on attracting a range of businesses and supporting workforce development, including job-training services for low-income residents. The County allocates a large portion of CDBG funding to economic development activities to provide programs that lift families out of poverty and support small business development. In addition, the County is going to continue to partner with local social service organizations that target low-income residents.

Planned economic development and anti-poverty programs include:

- Job-training services through NCWorks.
- Partnerships for job training with Fayetteville Technical Community College.
- Business consulting with the Center for Economic Empowerment and Development (CEED).
- Homeless prevention services.
- Employment training for homeless persons and special needs populations, including veterans.
- Promotion of new job opportunities.

Cumberland County will continue to make progress in reducing the number of poverty-level families in the community. This is done through leveraging resources and partnering with other human services agencies that provide assistance through programs such as housing rehabilitation and public services programs to assist with medical needs.

Actions planned to develop institutional structure

Cumberland County has years of experience and is well equipped to implement and coordinate activities among public, private and nonprofit agencies. Although funding has continued to decrease over the years, Community Development will continue to streamline processes and procedures for efficiency and effectiveness, in addition to searching for additional funding resources to strengthen its ability to serve and offer programs and services that improve the quality of life for the residents and meet the community's need.

Cumberland County works with the following agencies to enhance coordination:

- **Cumberland County Department of Community Development** - oversees the CDBG and HOME programs and oversees the Continuum of Care for Fayetteville-Cumberland County.
- **Fayetteville Metropolitan Housing Authority** - oversees the improvements to public housing communities and the Section 8 Housing Choice Voucher Program.
- **United Management II** - oversees development of affordable housing through Low-Income

Housing Tax Credits (LIHTC).

- **Social Services Agencies** - the County provides funds to address the needs of low- and moderate-income persons.
- **Housing Providers** - the County provides funds to rehabilitate and develop affordable housing for low- and moderate-income families and individuals.
- **Cumberland County Department of Social Services** - provides mainstream social services to individuals and families in Cumberland County and the City of Fayetteville.

As part of the CDBG and HOME application planning process, local agencies, and organization are invited to submit proposals for CDBG and HOME funds for eligible activities. These groups participate in the planning process by attending the public hearings, informational meetings, and completing survey forms.

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

Cumberland County Community Development will enhance the coordination between agencies by providing funding through a request for proposal process to eligible agencies to improve access to services.

Public Institutions: The County will act as a clearinghouse and facilitator for many of the activities described in the annual action plan. As the local unit of government, the County is empowered to apply for and administer certain types of grants. Support from the County, expressed as a certification of consistency or some other instrument, may be all that is required for some activities. Other activities will involve the more direct participation of the County for funding, acquisition of land or buildings, or in convening meetings of various agencies coordinate strategies on how to seize opportunities. The County will continue to administer the CDBG and HOME programs.

The Fayetteville Metropolitan Housing Authority administers public housing and Section 8 Housing Choice Voucher programs throughout the County. This Authority is responsible for the management and maintenance of public housing units. The Housing Authority will continue in its efforts to modernize these public housing units in order to provide decent, affordable housing in the County.

Cumberland County is the lead entity for the Fayetteville-Cumberland County CoC, and coordinates strategies to reduce homelessness and provide services for those that are homeless in the County. Efforts are made to coordinate with developers to create permanent supportive housing units, and with shelters and care providers to transition the homeless population into the housing that meets their specific needs. Cumberland County holds monthly CoC meetings with members to discuss strategies to assist the homeless population in the County.

Non-Profit Organizations: Non-profit housing agencies play a role in the implementation of this plan. Through the construction of new housing, and the rehabilitation of existing units, these agencies access financing sources such as the Low-Income Housing Tax Credit, Golden LEAF funding, and charitable

contributions that increase the supply of affordable housing. While some groups focus on the rehabilitation of single units for resale to first time homebuyers, others have attempted to create assisted rental developments. In the future, the union of such groups with social service agencies that serve specific special needs populations will address the Five-Year Consolidated Plan strategy for creation of supportive housing and affordable housing opportunities.

Social service agencies are a link between the provision of housing and the population it is intended to serve. The agencies work directly with providers of services to persons with special needs including: mental health, elderly, drug and alcohol addiction and families that are at-risk of becoming homeless. Although these agencies cannot provide housing, they can direct housing efforts where needed and are integral in the planning of housing and services for target populations. Emergency shelters, including the Salvation Army and Endeavors, will continue to provide shelter for the homeless.

Private Industry: The County partners with agencies and organizations that coordinate economic development activities. The County partners with the City of Fayetteville’s Department of Economic & Community Development, which has multiple programs to assist in job development and retention that are targeted toward private businesses. Small business consulting, loans, and grants are designed to assist entrepreneurs in areas with high low- and moderate-income populations. Additionally, larger financial incentive programs are implemented by the County to recruit businesses that provide jobs that pay decent wages for residents of the County.

Discussion:

Cumberland County allocates CDBG and HOME funds annually to implement actions designed to accomplish goals and objectives that meet community needs identified in its Consolidated Plan. Consequently, the County is responsible for ensuring that funding recipients (i.e., subrecipients and CHDOs) comply with applicable regulations and requirements governing their administrative, financial and programmatic operations. In accordance with 24 CFR 91.230, the County utilizes a local monitoring and compliance plan that describes the standards and procedures that will be used to monitor activities carried out in each One-Year Action Plan and will used to ensure long-term compliance with requirements of the programs involved; the plan also includes a schedule of projected monitoring visits for the program year.

The County’s monitoring and compliance plan is designed to accomplish the following objectives:

Pre-disbursement / pre-monitoring conferences are conducted to ensure that sub grantees understand the rules and requirements of the programs. During each conference, specific contract requirements, documentation and filing procedures, reporting requirements, and reimbursement procedures were explained to the sub grantee.

Desk reviews are conducted periodically as requests for reimbursements are submitted by the sub grantees on a monthly basis to ensure timely expenditure of funds. The County disburses its funds via a reimbursement process. The County reimburses sub grantees only when a request for reimbursement was accompanied with supporting documentation such as copies of invoices, cancelled checks, receipts, time sheets, etc. Sub-grantees were also required to submit budget summary reports so that these reports can be compared for accuracy. Activity summary reports are required to be submitted on a regular basis to monitor the sub grantee's progress towards meeting their goals.

Onsite monitoring visits are performed during the program year on selected sub-grantees. Some of the areas reviewed most often during onsite visits include:

- Compliance with participant eligibility, income certification requirements, and documentation guidelines; and reporting;
- Confidentiality procedures;
- Progress towards meeting projected goals and timely use of funds;
- Compliance with specific contractual requirements; and
- Review of audit report.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0.00
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	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
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.	\$0.00
5. The amount of income from float-funded activities	\$0.00
Total Program Income	\$0.00

Other CDBG Requirements

1. The amount of urgent need activities	\$0.00
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

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:

Cumberland County does not intend to use any other forms of investment other than those described in 24 CFR 92.205(b).

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:

In applying the resale provisions to affordable housing development for homeownership, the County will designate a unit as an affordable unit. When a unit is designated affordable and it is sold during the affordability period, the sale must meet the following criteria:

The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principle residence.

The sales price must be "affordable" to the new purchaser. Cumberland County Community Development defines affordable as the homebuyer paying no more than 30% of their annual gross income toward principal, interest, taxes, and insurance (PITI).

The County will ensure that the housing will remain affordable to a reasonable range of low- income homebuyers whose incomes fall within the range of 60% to 80% of the 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:

Cumberland County's resale recapture guidelines for units acquired with HOME funds break down in the following manner:

HOME amount per unit

Minimum Period of Affordability

Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

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:

Cumberland County does not intend to refinance any existing debt for multifamily housing that will be rehabilitated with HOME Funds.

Discussion:

Cumberland County and the City of Fayetteville both receive HOME funds. For this reason, Cumberland County does not participate in a HOME Consortium.