

Executive Summary

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

1. Introduction

Gwinnett County, Georgia is located in the northeast region of the Atlanta metropolitan area. It is comprised of 437 square miles and is home to 16 municipalities. With an estimated population of 983,656 in 2022, Gwinnett's population has grown 9% since 2020.

Gwinnett has received direct assistance under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program since 1986 and is a participating jurisdiction under the HOME Investment Partnerships Program (HOME), as well as a formula grantee under the Emergency Solutions Grant Program (ESG). These grant-funded programs must be expended within the County for citizens who meet applicable eligibility criteria and for eligible activities as identified in the program regulations and guidelines.

2. Summarize the objectives and outcomes identified in the Plan

Identified needs were established through a collaborative process with citizens, public interest groups, and other stakeholders in Gwinnett County. The proposed activities address notable housing and community development needs for low- and moderate-income residents and homeless individuals. This document includes narrative responses to specific questions that grantees must answer to comply with the Consolidated Planning Regulations at 24 CFR part 91.

The following is an outline of the strategic priorities identified in the 2020-2024 Consolidated Plan.

a. Access to Affordable Housing

- Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs and through homeowner education on home maintenance.
- Provide down-payment assistance (principal reduction and closing cost reduction) to eligible low- and moderate-income homebuyers.
- Seek opportunities to create rental units through the adaptive reuse of existing sites and structures and through an emphasis on leveraging of resources.
- Provide rental subsidies to low-income households to make existing units affordable.
- Encourage private and nonprofit developers by funding acquisition, development, and rehabilitation activities.
- Increase the supply of affordable housing units.

- Increase the supply of housing units for low-income, disabled, and elderly persons.

b. Homelessness Reduction

- Provide funding for emergency shelters, rapid re-housing, and homelessness prevention programs.
- Provide funding to increase permanent supportive housing opportunities and work to create a stronger network of providers of supportive and mainstream services to individual clients.
- Encourage the efficient use of HMIS technology and support its expansion beyond homeless service providers to link the various services provided by Gwinnett County nonprofits and agencies and standardize performance measures.
- Support nonprofit, private, and public service providers that provide housing opportunities for the homeless, those at risk of becoming homeless, and targeted populations.

c. Non-Housing Community Development

- Maintain high-quality infrastructure and community amenities: clean water, sewers, stormwater and drainage, power distribution, roads, sidewalks, parks, libraries, and other civic mechanisms.
- Support initiatives that increase walkability and improve the health of residents in low-income areas.
- Improve existing deteriorated public facilities and infrastructure in low- and moderate-income areas.
- Equipment and operating public services support for agencies serving Targeted Populations.
- Construct, acquire, and/or renovate public facilities and infrastructure to meet the needs of targeted populations.
- Conduct Economic Development Activities

d. Affirmatively Further Fair Housing Choice

- Increase fair housing education and build capacity for testing and enforcement of fair housing laws.
- Support improved access to community resources.
- Refer housing discrimination complaints to HUD FHEO for investigation and potential action.

3. Evaluation of past performance

Gwinnett County reports its progress in meeting the five-year strategic and annual goals in the Consolidated Annual Performance Evaluation Report (CAPER) each year. Listed below are some of the accomplishments from the County's 2023 CAPER.

In 2023, the Gwinnett Housing and Community Development Division managed projects benefitting 18,366 low-and moderate-income persons and dispersed \$10,970,068.71 in CDBG, HOME, and ESG funding to further its strategic priorities as outlined in the 2020-2024 Consolidated Plan and supporting Annual Action Plan.

Affordable Housing and Supporting Services Activities

Home Ownership Initiatives

A total of 1 family was assisted with HOME-funded activities, including Down Payment Assistance, the production of homeownership properties.

Tenant-Based Rental Assistance

The County awarded funds for the Tenant-Based Rental Assistance (TBRA) program to assist 20 families with outstanding rental arrears to prevent evictions.

Homelessness Reduction Activities

The County expended \$1,395,544.69 in ESG funding to assist 2,090 people with overnight shelter, essential care needs, job training, case management, transportation assistance, financial counseling, childcare assistance, and life-skills coaching.

Public Improvements and Infrastructure

The County allocated funding in FFY 2023 and prior year CDBG funding for public facilities and infrastructure improvements, such as repairing water and sewer lines, construction of sidewalks, and playground construction and renovations.

Public Service Activities

The County and its subrecipients spent \$5,797,966.11 for public service activities, such as purchasing equipment, mental health and healthcare services, childcare services, and job training.

Local Economic Development Activities

The County continued to support low- to moderate-income small businesses and entrepreneurs through its continued funding of both Goodwill of North Georgia and the Gwinnett Entrepreneur Center. Additionally, in 2023 Gwinnett County utilized CDBG-CV funds to operate a Small Business Assistance Program to provided financial assistance to those LMI businesses most impacted by the pandemic.

Affirmatively Furthering Fair Housing Choice

Gwinnett Housing and Community Development Division hosted workshops to educate the community about fair housing rights. This training allows the County to respond to unintentional, systemic, and incidental barriers in the County policy administration based on county policy.

4. Summary of Citizen Participation Process and consultation process

The Gwinnett County Housing and Community Development Division prepares a Citizen Participation Plan every five years. The process for involving citizens may change from time to time, as described in the Citizen Participation Plan approved by the Gwinnett County Board of Commissioners, and as required by HUD, for consistency with changes in the citizen participation requirements of 24 CFR Part 91.

To solicit citizen input in the development of the Annual Action Plan 2024, the Housing and Community Development Division compiled a citizen/stakeholders mailing and email list, which was used to notify the public of proposed meetings, and to inform the public of changes that may take place throughout the Consolidated Plan preparation. During the development of the plan, Gwinnett County met minimal citizen participation requirements by describing the County's methodology for involving citizens in the local program planning, project/activity implementation process, and providing a platform for citizens to provide input.

Gwinnett County conducted extensive consultation with the public, nonprofit leaders, elected officials, County Staff, homeless service providers, fair housing advocates, and leaders representing minority groups in the preparation of this plan. The Housing and Community Development Division hosted a needs assessment meeting prior to the development of the plan and a public hearing to review the draft priorities and proposed projects. The meetings are summarized in the Citizen Participation section of this plan.

Gwinnett County held a virtual needs assessment public hearing on August 23, 2023, and 1 hybrid public hearing on December 19, 2023 to solicit public input on the proposed 2024 Annual Action Plan documents. There was a total of 28 attendees who attended these meetings to provide feedback.

5. Summary of public comments

All public comments received can support the strategic priorities identified. To review all public comments, please refer to the Appendix.

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

All written and verbal public comments were accepted.

7. Summary

The Proposed Consolidated Plan 2020-2024 established strategic priorities as a product of extensive consultation with community stakeholders, combined with data from the U.S. Census and other sources, which indicate specific housing and community development needs in Gwinnett County. Combined with a needs assessment survey, under the Citizen Participation Plan, Gwinnett County identified the following strategic priorities to address utilizing CDBG, HOME, and ESG funds in conjunction with leveraging other public and private investments:

1. Access to Affordable Housing
2. Homelessness Reduction
3. Non-Housing Community Development
4. Affirmatively Furthering Fair Housing Choice

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
Lead Agency	Gwinnett County	
CDBG Administrator	Gwinnett County	Gwinnett County Planning and Development Dept.
HOPWA Administrator		
HOME Administrator	GWINNETT COUNTY	Gwinnett County Planning and Development Dept.
ESG Administrator	GWINNETT COUNTY	Gwinnett County Planning and Development Dept.
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

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

1. Introduction

A vital component of preparing the Consolidated Plan and Annual Action Plan begins with consulting with members of the public, nonprofit leaders, elected officials, County staff, homeless service providers, fair housing advocates, and community leaders representing minority groups. The Housing and Community Development Division Office hosted a virtual Needs Assessment meeting prior to the development of the plan and a virtual public meeting to review the draft priorities. The meeting is summarized in the Citizen Participation section of this plan.

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(l))

The activities that enhanced the coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies depend on the efficiency and concerted efforts among service providers. The Gwinnett Coalition for Health and Human Services (“the Coalition”) is responsible for the planning of services for Gwinnett’s children and families in crisis by way of connecting them with the appropriate local resources to improve their circ

The activities that enhanced the coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies were driven by the concerted efforts among service providers. The Gwinnett Coalition for Health and Human Services (“the Coalition”) is responsible for the planning of services for Gwinnett’s children and families in crisis by way of connecting them with the appropriate local resources to improve their circumstances.

The Housing and Community Development Division works closely with the Coalition to identify needs, set priorities, plan resources, and mobilize solutions to the County’s most pressing needs. Additionally, the Housing and Community Development Division requires ESG subrecipients and housing-related agencies to actively participate in the Coalition’s Emergency Assistance Action Team and Housing Collaborative monthly meetings. Agency staff are able to address common goals, share information and resources, discuss challenges and successes, collaborate on special projects, and coordinate services to maximize efficient use of funding.

The 2009 HEARTH Act requires ESG grantees and subrecipients to utilize Homeless Management Information System [HMIS]. Specific benefits to homeless persons include streamlined referrals, coordinated intake and assessment, and coordinated case management. Furthermore, case managers also benefit from HMIS’s case planning and management tools, eligibility determination assistance, and simplified reporting. The HMIS data allows providers to track client outcomes, review the coordination of services, simplify reporting for agency stakeholders, and analyze program data.

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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.

Gwinnett County is a member of the Georgia Balance of State Continuum of Care [CoC] administered by the Georgia Department of Community Affairs [DCA]. All ESG activities funded by Gwinnett County must address the needs identified in the Balance of State CoC, which are also reflected in the Gwinnett County Consolidated Plan, and must pursue the Homeless Goals and one or more of the priority objectives to address the needs of the homeless.

In the following detailed sections, Gwinnett County's consultations with the Georgia Balance of State Continuum of Care are coordinated:

1. To determine how to allocate ESG funds for eligible activities;
2. To develop the performance standards for activities funded under ESG; and,
3. To establish funding, policies, and procedures for the operation and administration of the Homeless Management Information System [HMIS].

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

Allocating ESG Funds for Eligible Activities

As a member of the Balance of State, Gwinnett County consults regularly with CoC to coordinate solutions to end homelessness in Gwinnett County. In consultation to develop this plan and all other plans, the County and BoS allocate resources based on a collective set of priorities to ensure that funding is allocated to the most urgent needs within the County.

Additionally, ESG projects chosen for funding by the State must address the needs identified by the County's Consolidated Plan. Agencies are required to certify that their project is consistent with the County's Consolidated Plan, including its strategic priorities and long-term objectives.

Developing the Performance Standards and Outcomes for Activities Funded Under ESG

Performance standards provide a measure for ESG grantees to evaluate the effectiveness of each ESG service provider in the areas of (a) targeting those who need assistance most; (b) reducing the number of people who are homeless or in emergency shelters; (c) lessening the time people spend homeless, and (d) reducing clients' housing barriers or housing stability risks.

Gwinnett County performance standards for ESG-funded activities are reflective of needs identified by the CoC while meeting entitlement area priorities. These performance standards are reviewed annually and consultations with DCA will be held prior to the implementation of any changes.

Establishing Funding Policies and Procedures for the Administration of HMIS

ClientTrack is the assigned HMIS provider to the Southeast region. Consultation with the Continuum of Care determined that the Balance of State would be a resource, but ultimately, Gwinnett County would be responsible for HMIS Administration for its entitlement community. Consequently, Gwinnett County implements the Continuum's policies and procedures for operating and administering HMIS as a framework to ensure consistency. The County will continue to work with the Continuum to establish joint expectations, requirements, and agreements for user participation and ensure that data on all persons served and all activities assisted under ESG are entered into Pathways per HUD's standards concerning participation, data collection, and reporting for HMIS. Victim service providers will be required to use a comparable database (Alice) to meet HMIS requirements. When necessary and available, ESG funds will be used to cover the costs of HMIS.

The County will continue to engage with ClientTrak staff and actively participate in User Group meetings, which allow users to share successes and challenges in implementing HMIS and address any unmet needs.

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

1	Agency/Group/Organization	GOODWILL OF NORTH GEORGIA
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to reduce homelessness is to help each individual move toward the goal of self-sufficiency.
2	Agency/Group/Organization	ATLANTA LEGAL AID
	Agency/Group/Organization Type	Services - Legal
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission is to reduce homelessness by providing for additional legal services and representation in civil proceedings.
3	Agency/Group/Organization	Catholic Charities of the Archdiocese of Atlanta
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Affirmatively Furthering Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to affirmatively further fair housing by providing educational opportunities through housing counseling.
4	Agency/Group/Organization	Gwinnett Housing Corporation
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to reduce homelessness is to help each individual move toward the goal of self-sufficiency.
5	Agency/Group/Organization	Overcomers House Incorporated
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to reduce homelessness is to help each individual move toward the goal of self-sufficiency.
6	Agency/Group/Organization	PARTNERSHIP AGAINST DOMESTIC VIOLENCE, INC.
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to reduce homelessness by better addressing services for victims of domestic violence in order to move them toward the goal of self-sufficiency.
7	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services - Housing

What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The strategy in Gwinnett County's mission to reduce homelessness is to help each individual move toward the goal of self-sufficiency.

Table 2 – Agencies, groups, organizations who participated

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

The County did not exclude any agency type during this process in the preparation of this Action Plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Georgia Department of Community Affairs	Increasing access to affordable housing through the use of Rapid Re-Housing is listed as a goal in both plans. Additionally, both plans align with the use of Housing First model to address the issue of homelessness.
2020-2024 State of Georgia Consolidated Plan	Georgia Department of Community Affairs	CDBG, ESG, and HOME funds are identified as resources for addressing gaps in the accessibility of affordable housing, preserving the existing housing stock, and supporting organizations that provide services to the homeless.
Gwinnett County 2045 Unified Plan	Gwinnett County Planning and Development	A central Theme of the Unified Plan is to provide more housing choices. The 2020-2024 Consolidated Plan addresses this by prioritizing increasing access to affordable housing, increasing housing options for the homeless and at risk of homelessness, and reducing substandard housing. The Unified Plan specifically outlines a policy to expand maintenance and rehabilitation assistance to homeowners; this aligns with the 2020-2024 Consolidated Plan goal to reduce substandard housing with homeowner housing rehabilitation and homeowner education. The Unified Plan discusses options for redevelopment and infrastructure expansion. The 2020-2024 Consolidated Plan supports the use of HUD funding to construct new, and improve existing, public facilities and infrastructure. The Unified Plan placed a focus on maintaining economic development and fiscal health.

Plan 2040	Atlanta Regional Commission	All six goals listed in Gwinnett County 2020-2024 Consolidated Plan align with Plan 2040 objective to promote places to live with easy access to jobs and services.
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Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Gwinnett County will continue to partner with local government agencies and groups to ensure full and complete implementation of the Consolidated Plan. These will specifically include collaborating with Gwinnett County Planning and Development as they begin the process of recalibrating and updating the Unified Plan. This update will allow the newly formed Housing and Community Development Division the ability to provide input on future land use and development initiatives.

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**

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	Newspaper Ad	Non-targeted/ broad community	Notice to advertise public hearings, surveys, workshops, and stakeholder interviews were sent to target outreach groups. Attendance is noted for each mode of outreach.	Action Plan 2024 priority needs were established from comments received through all modes of outreach advertised.	All comments were accepted	
2	Public Hearing	Non-targeted/ broad community	Two public hearing were held on September 7, 2023 and December 19, 2023 to receive citizen input from residents on community development, housing, and homeless needs in the County. The meetings were attended by a total of 28 individuals, representing 7 organizations.	The Gwinnett Housing and Community Development Division conducted two Public Hearing to provide the community with an opportunity to provide feedback on recommended projects. Action Plan 2024 priority needs were established in part from comments received at the public hearings.	All comments were accepted.	

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)
3	Application Workshops	Non-targeted/ broad community	64 persons attended the application workshop.	N/A	N/A	
4	Internet Outreach	Non-targeted/ broad community	Notice of FFY 2024 Funding Availability and Application links were provided via the Gwinnett County Website.	N/A	N/A	https://www.gwinnettcourty.com/web/gwinnett/departments/financialservices/grants/hudprograms

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The anticipated budget for FFY 2024 is as follows:

CDBG - \$5,740,923.00

HOME - \$2,199,792.00

ESG - \$475,845.00

Anticipated Resources Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	*Admin and Planning *Economic Development *Housing Rehab *Facility Improvements & Acquisition *Public Services – Equipment *Public Services - Operating	5,740,923			5,740,923	0	CDBG Funds used throughout the County will leverage other federal, local, and private funds.
HOME	Public-Federal	*Admin and Planning *Homebuyer Assistance *Multifamily Rental Rehab *New Construction for Ownership *TBRA	2,199,792			2,199,792	0	HOME funds will leverage other federal, local, and private funds. Subrecipient or developers supply a 25% match of HOME funds.
ESG	Public-Federal	*Admin and Planning *Conversion and rehab for transitional housing *Financial Assistance *Overnight Shelter *Rental Assistance *Transitional Housing	475,845			475,845	0	ESG match requirements will be met by requiring organizations to meet a 100% match of all funds received.

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

Gwinnett County will use a combination of public and private funding to carry out activities identified in this plan. During this Consolidated Plan period, the County will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated Plan. Currently, the County uses its Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) program funds, and HOME Investment Partnerships (HOME) program funds through its HUD CPD program funding. Gwinnett County will investigate other sources of funding that are consistent with the goals of the 2025-2029 Consolidated Plan by working with community partners and non-profit organizations to encourage leveraging of available funding sources and strengthen capacity building.

The HOME program requires a 25% match of the total amount of funds drawn down during the federal fiscal year. Gwinnett County HOME subrecipients are required to submit a match log that identifies the sources of match funds for each fiscal year. Match funds can be derived from various sources including the value of sponsorships from local businesses; waived County fees; donated land or improvements; volunteer hours; donated materials; or other eligible methods as provided in the HOME regulations. The County's anticipated match obligation for FFY 2024 is \$549,948.00. Historically, match amounts for HOME subrecipients have far exceeded the 25% annual contribution requirements stipulated by HOME program regulations.

The ESG program requires a 100% match for the total amount of funds drawn down during the federal fiscal year. Gwinnett County requires all ESG subrecipients to provide a dollar-for-dollar match by calculating the value of volunteer hours, private donations, and salary not covered by ESG, other grant funding, in-kind donations, or by other eligible methods as provided in the ESG regulations. The County's anticipated match obligation for FFY 2024 is \$475,845.00.

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

Gwinnett County has set-aside unprogrammed funding for the purposes of acquiring and redeveloping land or property for use to address the needs identified in this plan. The Housing and Community Development Division will be leading the effort to identify options to acquire, rehabilitate, and redevelop vacant land and properties throughout the County for affordable housing or other community development projects that will benefit LMI residents.

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	Administration & Planning	2020	2024	Administration & Planning	Countywide	Access to Affordable Housing, Homelessness Reduction, Non-Housing Community Development, Affirmatively Further Fair Housing Choice	CDBG: \$1,148,184 HOME: \$219,979 ESG: \$35,688	Other: 1
2	Homeowner Housing Rehabilitation	2020	2024	Affordable Housing	Countywide	Access to Affordable Housing	CDBG: \$100,000	Homeowner Housing Units Rehabilitated: 5
3	Public Facilities & Infrastructure	2020	2024	Non-Housing Community Development	Countywide/Limited Clientele	Non-Housing Community Development	CDBG: \$2,693,046	Public Facility Beneficiaries: 7,743
4	Economic Development	2020	2024	Non-Housing Community Development	Countywide	Non-Housing Community Development	CDBG: \$25,000	Economic Development Beneficiaries: 20
5	Public Services	2020	2024	Non-Housing Community Development	Countywide/Limited Clientele	Access to Affordable Housing, Homelessness Reduction, Non-Housing Community Development, Affirmatively Further Fair Housing Choice	CDBG: \$591,138	Public Service Beneficiaries: 3,707
6	Community Housing Development Organization (CHDO)	2020	2024	Affordable Housing	Countywide	Access to Affordable Housing	HOME: \$329,968	Homeowner Housing Units Added: 7

7	Acq./Rehab/Disp. Of Affordable Housing & Land	2020	2024	Affordable Housing/Non-Housing Community Development	Countywide	Access to Affordable Housing, Affirmatively Further Fair Housing Choice	HOME: \$1,417,945	Housing Units Constructed/Added: 58
8	Down Payment Assistance	2020	2024	Affordable Housing	Countywide	Access to Affordable Housing, Affirmatively Further Fair Housing Choice	HOME: \$0	Households Assisted w/ Direct Financial Assistance: 0
9	Tenant-Based Rental Assistance	2020	2024	Affordable Housing/Homeless	Countywide	Access to Affordable Housing, Homelessness Reduction, Affirmatively Further Fair Housing Choice	HOME: \$231,900	TBRA Beneficiaries: 104
10	Emergency Shelter & Supportive Services - Homeless	2020	2024	Homeless	Countywide/Limited Clientele	Homelessness Reduction	ESG: \$225,000	Emergency Shelter/Street Outreach: 416
11	Permanent Supportive Housing - Homeless/At-Risk	2020	2024	Affordable Housing/Homeless	Countywide	Access to Affordable Housing, Homelessness Reduction, Affirmatively Further Fair Housing Choice	ESG: \$215,157	Homelessness Prevention/Rapid Re-Housing Beneficiaries: 703

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	Administration & Planning
	Goal Description	Funding for the planning, implementation, and management of the CDBG, HOME, and ESG grant programs.
2	Goal Name	Homeowner Housing Rehabilitation
	Goal Description	Funding for Homeowner Housing Rehabilitation and housing service delivery costs (legal and inspections fees).
3	Goal Name	Public Facilities & Infrastructure
	Goal Description	Funding for Public Facilities & Infrastructure/Acquisition/Renovation Activities
4	Goal Name	Economic Development
	Goal Description	Funding for workforce development for adult disabled population.
5	Goal Name	Public Services
	Goal Description	Funding for equipment and operations support.
6	Goal Name	Community Housing Development Organization (CHDO)
	Goal Description	Funding for eligible housing development organizations helps to increase access to affordable housing via acquisition, construction, or rehabilitation of new or existing housing structures.
7	Goal Name	Acq./Rehab/Disp. Of Affordable Housing & Land
	Goal Description	Funding to increase access to affordable housing for income-eligible homebuyers via acquisition, rehabilitation, or disposition of affordable housing units and/or land.
8	Goal Name	Down Payment Assistance
	Goal Description	Funding for direct financial assistance to income-eligible first-time homebuyers.
9	Goal Name	Tenant-Based Rental Assistance

	Goal Description	Funding for direct financial assistance to income-eligible renters.
10	Goal Name	Emergency Shelter & Supportive Services - Homeless/At-Risk
	Goal Description	Funding for emergency shelter and street outreach activities that provide overnight shelter or immediate assistance to persons who are homeless or at risk of becoming homeless.
11	Goal Name	Permanent Supportive Housing - Homeless/At-Risk
	Goal Description	Funding for homelessness prevention and rapid re-housing activities that provide emergency short-term assistance to help individuals and families.

Projects

AP-35 Projects – 91.220(d)

Introduction

In 2024, Gwinnett County will allocate CDBG funding to a total of 32 projects. While most of these projects will provide a direct benefit to LMI persons, 3 will provide low-mod area (LMA) benefits to identified low-income Census Tracts located within municipalities that participate in Gwinnett’s Urban County CDBG program.

Per HUD regulations, no more than 20% of the total CDBG award can be allocated to Planning and Administration. In 2024, Gwinnett County will allocate \$1,148,184 (20% of the total CDBG award), for administration and planning.

HUD also allows no more than 15% (\$861,138) of the CDBG award to be used for Public Services projects. In 2024, Gwinnett County will allocate \$861,138 (15%), to Public Services projects.

HUD’s HOME regulations allow no more than 10% of the total HOME award to be used for administrative costs. In 2024, Gwinnett County will allocate \$219,979.20 (10% of the total HOME award) to fund planning and administration costs. HOME regulations also require that at least 15% (\$329,968) of the total HOME award be allocated to a Community Housing Development Corporation (CHDO). Gwinnett County will allocate \$329,968 to Atlanta Neighborhood Development Partnership for CHDO activities.

Per HUD regulations, no more than 7.5% of the total ESG award can be used for Planning and Administration. In 2024, Gwinnett County will allocate \$35,688 (7.5%) of the total award, to

administration and planning.

Projects

#	Project Name
1	CDBG Program Administration & Planning
2	CDBG Housing Rehabilitation
3	CDBG County Projects
4	CDBG Economic Development
5	CDBG Public Facilities - Acquisition and Rehabilitation
6	CDBG Public Facilities - Infrastructure Improvements
7	CDBG Public Services - Equipment
8	CDBG Public Services - Operating Costs
9	ESG 2024 - Gwinnett County
10	HOME Grant Program Administration & Planning
11	HOME Affordable Housing
12	Community Housing Development Organization (CHDO)
13	Tenant-Based Rental Assistance (TBRA)

Table 6 - Project Information

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

The projects selected meet the identified needs in the community with the resources provided. Limited resources with which to finance programs and projects are the greatest obstacle to meeting the municipality's underserved needs. Gwinnett County will continue to base allocations for this Action Plan period on the priorities identified in the FFY 2020-2024 Consolidated Plan, community input, and qualified applications for funding under the Gwinnett County Board of Commissioners' direction.

Through the use of CDBG, HOME, and ESG funds, Gwinnett County's priorities are to meet the various needs of low and moderate-income persons residing in the County. These needs include but are not limited to affordable housing for low and moderate-income persons, housing options for homeless and at-risk populations; increased capacity for public services, addressing community development needs, and access to economic development activities.

Gwinnett County prioritizes its allocations by ensuring that all proposed projects align with at least one of its strategic priorities and principally benefit low to moderate-income clientele within the County's borders. This can be accomplished in the following ways:

- **Area Benefit:** Projects can target a Census Tract identified as defined by HUD's Income Limit Guidelines based on the Atlanta-Sandy Springs-Marietta Metro Statistical Area (MSA); Four of the projects allocated funding in FFY 2024 will provide an Area Benefit; or,
- **Direct Benefit:** At least 51% of project beneficiaries must meet the FFY 2024 income limits or belong to a presumed benefit group. Subrecipients must document the income and/or

presumed benefit status of every reported beneficiary.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Program Administration & Planning
	Target Area	Countywide
	Goals Supported	Administration & Planning
	Needs Addressed	Access to Affordable Housing Non-Housing Community Development Affirmatively Further Fair Housing Choice
	Funding	CDBG: \$1,148,184.00
	Description	CDBG program administration funds will be used to project oversight, reporting, monitoring, and fair housing activities as required by HUD.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	Gwinnett County
2	Planned Activities	Provide administrative structure for the planning, implementation, and management of the CDBG program.
	Project Name	Unprogrammed Funds
	Target Area	Countywide
	Goals Supported	TBD
	Needs Addressed	TBD
	Funding	CDBG: \$913,555.00
	Description	Unprogrammed CDBG funds will be utilized on future CDBG activities that have not yet been identified but will be allocated at a later date in 2024.
	Target Date	12/31/25

	Estimate the number and type of families that will benefit from the proposed activities	To Be Determined
	Location Description	Countywide
	Planned Activities	To Be Determined
3	Project Name	CDBG Housing Rehabilitation
	Target Area	Countywide Gwinnett County AH
	Goals Supported	Homeowner Housing Rehabilitation
	Needs Addressed	Access to Affordable Housing
	Funding	CDBG: \$100,000.00
	Description	Funding will be used to manage the program and meet the program's pending obligations and address the community demand for additional program enrollment.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 5 low – to moderate- income households will be served with this project.
	Location Description	Countywide
4	Planned Activities	Funding will be used to manage the program and meet the program's pending obligations and address the community demand for additional program enrollment.
	Project Name	CDBG County Projects
	Target Area	Low/Mod Census Tracts
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$453,718
	Description	Funding will be used for Non-Housing Community Development activities, such as constructing, acquiring, and /or renovating public facilities and infrastructure to mee the needs of targeted populations.

	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that more than 20 LMI households will benefit from the completion of this sidewalk project.
	Location Description	Lake Drive in Norcross between Buford Highway and Pleasantdale Road.
	Planned Activities	This project will add 3,500 feet of sidewalk along Lake Drive, from US23/ SR18/ Buford Highway to Pleasantdale Road.
5	Project Name	CDBG Economic Development
	Target Area	Countywide
	Goals Supported	Economic Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$25,000.00
	Description	Funding for Economic Development activities will assist LMI individuals in workforce training and job placement.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 20 disabled adults will benefit from the proposed activities.
	Location Description	Gwinnett County
	Planned Activities	Disability Action Cetner of Georgia, Inc. - Locating Employment Avenues through Peer Support: Pathways to Success - \$25,000.00
6	Project Name	CDBG Public Facilities – Acquisition and Rehabilitation
	Target Area	Countywide
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$1,083,328
	Description	Funding will be used to acquire and/or renovate new or existing facilities for non-housing community development activities.
	Target Date	12/31/2024

	Estimate the number and type of families that will benefit from the proposed activities	1,684
	Location Description	Gwinnett County
	Planned Activities	Annandale – Annandale Dental Clinic - \$50,000 Good Samaritan Health Center of Gwinnett – Access Academy - \$833,328 Gwinnett Housing Corporation – Pathway Rehabs - \$200,000
7	Project Name	CDBG Public Facilities – Infrastructure Improvements
	Target Area	Low/Mod Census Tracts
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$1,156,000
	Description	Funding will be used to renovate or construct public infrastructure such as sidewalks, roads, and sewers, etc.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	6,059
	Location Description	Gwinnett County
8	Planned Activities	City of Buford – New Street Roadway Improvements - \$1,000,000 City of Norcross – Norcross Residential Resurfacing Project - \$156,000
	Project Name	CDBG Public Services - Equipment
	Target Area	Countywide Limited Clientele
	Goals Supported	Public Services
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$270,000.00
	Description	Funding will be used for the purchase of equipment needed for public services program activities.

	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1091 individuals will benefit from this proposed activity.
	Location Description	Gwinnett County
	Planned Activities	Annandale at Suwanee, Inc. – FF&E for Program Center - \$50,000.00 Gwinnett Christian Terrace- Transport of Older and Permanently Disabled Adults - \$70,000.00 King David Community Center of Atlanta – Vans Purchase - \$50,000.00 Pregnancy Resource Center of Gwinnett – Obria CDNG 2024 Public Services - \$100,000.00
9	Project Name	CDBG Public Services - Operating Costs
	Target Area	Countywide Limited Clientele
	Goals Supported	Public Services
	Needs Addressed	Non-Housing Community Development Affirmatively Further Fair Housing Choice
	Funding	CDBG: \$591,138.00
	Description	Funding will be used to support public service program needs as defined in CDBG regulations.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	As estimated 1,886 individuals will benefit from this proposed activity.
	Location Description	Gwinnett County

	Planned Activities	<p>Anchor of Hope, Inc. – Anchor Cares CDBG2024 - \$25,000.00</p> <p>Another Chance of Atlanta, Inc. – ACOA-CDBG PS - \$22,500.00</p> <p>Boys & Girls Clubs of Metro Atlanta – Youth Development Programming in Gwinnett County - \$25,000.00</p> <p>Catholic Charities of Atlanta – Bilingual Housing Counseling Services - \$32,500.00</p> <p>Council of Youth Anit Drug, Inc. – COYAD CARE - \$25,000.00</p> <p>Families First, Inc. – Behavioral Health Services - \$30,000.00</p> <p>Families First, Inc. – Families First CHISPA Program - \$30,000.00</p> <p>Gwinnett Housing Corporation – GHC Homeownership Center - \$61,638.00</p> <p>Hi-Hope Service Center, Inc. – Community Access Day Program - \$25,000.00</p> <p>Hi-Hope Service Center, Inc. – Community Employment - \$25,000.00</p> <p>Hope Clinic, Inc. – Chronic Care Management - \$25,000.00</p> <p>H.O.P.E. Inc. (Helping Other People be Empowered) – The Mildred Dowdley Gift of HOPE Program – \$29,500.00</p> <p>Impact 46, Inc. – Impact 46 Housing Stabilization Program - \$22,500.00</p> <p>Latin America Association, Inc. – Latino Basic Needs Program - \$25,000.00</p> <p>Men Stopping Violence, Inc. – Tactics & Choices Expansion to Gwinnett County - \$22,500.00</p> <p>Pearl Transit Corp – Food Delivery - \$32,500.00</p> <p>Sheltering Arms – Early Childhood Education/Family Support - \$32,000.00</p> <p>The Partnership Against Domestic Violence – PADV Gwinnett County Shelter - \$50,000.00</p> <p>The Salvation Army – Financial Emergency Services (Case Workers) - \$32,500.00</p> <p>The Shine Community, Inc. – TSC Operations - \$17,500.00</p>
10	Project Name	ESG 2024 - Gwinnett County
	Target Area	Limited Clientele

	Goals Supported	Administration & Planning Emergency Shelter and Supportive Services-Homeless Permanent Supportive Housing-Homeless/At-Risk Reduce Unsheltered Homelessness
	Needs Addressed	Homelessness Reduction
	Funding	\$475,845
	Description	Program activities that provide support for emergency housing and supportive services for the homeless or those who may become homeless.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	1,119
	Location Description	Gwinnett County
	Planned Activities	Rainbow Village Inc \$ 40,000 The Partnership Against Domestic Violence \$ 50,000 The Salvation Army \$ 37,500 Impact 46, Inc. \$ 37,500 Another Chance of Atlanta Inc \$ 25,000 Latin American Association, Inc. \$ 45,000 The Salvation Army \$ 35,000 Society of St. Vincent de Paul Georgia, Inc. \$ 34,297 Positive Impact Health Centers \$ 20,000 The Salvation Army \$ 25,860 Another Chance of Atlanta Inc \$ 20,000 Overcomers House Inc \$ 35,000 Council of Youth Anti-Drug Inc. \$ 17,500 Overcomers House Inc \$ 17,500 Administration \$35,688
11	Project Name	HOME Grant Program Administration & Planning
	Target Area	Countywide
	Goals Supported	Administration & Planning
	Needs Addressed	Access to Affordable Housing
	Funding	\$219,979
	Description	Funding will be used for program administration costs that include activity oversight, reporting, and monitoring as required by HUD.

	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	Gwinnett County
	Planned Activities	Provide Overall Program Administration
12	Project Name	HOME Affordable Housing
	Target Area	Countywide
	Goals Supported	Acq./Rehab/Disp. of Affordable Housing & Land
	Needs Addressed	Access to Affordable Housing
	Funding	\$1,471,945
	Description	Funding will be used for infrastructure/site development and land and/or rehab property acquisition.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 58 affordable housing units will be created from the proposed activities.
	Location Description	Gwinnett County
	Planned Activities	Gwinnett County Habitat for Humanity - \$517,945 Gwinnett Housing Corporation - \$900,000
13	Project Name	Community Housing Development Organization (CHDO)
	Target Area	Countywide Gwinnett County AH
	Goals Supported	Community Housing Development Organizations (CHDO)
	Needs Addressed	Access to Affordable Housing
	Funding	\$329,968
	Description	HOME Program funds are set aside for Community Housing Development Organizations (CHDO) for the development of affordable housing.
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 7 new affordable housing units will be developed as a result of the proposed activities.
	Location Description	Gwinnett County
	Planned Activities	Atlanta Neighborhood Development Partnership - Single Family New Construction - \$329,968
14	Project Name	Tenant-Based Rental Assistance (TBRA)
	Target Area	Countywide Gwinnett County AH
	Goals Supported	Tenant-Based Rental Assistance
	Needs Addressed	Access to Affordable Housing
	Funding	\$231,900
	Description	TBRA is a rent subsidy for eligible applicants with income at or below 80% AMI.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 104 households will benefit as a result of the proposed activities.
	Location Description	Gwinnett County
	Planned Activities	Society of St. Vincent de Paul Georgia, Inc. - \$156,900 Anchor of Hope, Inc. - \$45,000 Another Chance of Atlanta, Inc. - \$30,000

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

Gwinnett County is an urban county that relies on widely accepted data such as American Community Survey (ACS), HUD low and moderate-income summary data, and Federal Financial Institutions Examinations Council (FFIEC) data to determine areas throughout the community with concentrations of low and moderate-income communities. Program resources are allocated County-wide primarily with smaller allocations to Low/Mod Census Tracts for public facility projects and limited clientele activities as well. The chart below details out the complete distribution.

Geographic Distribution

Target Area	Percentage of Funds
County-Wide	43%
Limited Clientele	10%
Low- Moderate-Income Tracts	19%
Affordable Housing	29%

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Gwinnett County is an urban county that covers over 437 square miles however, there are concentrated areas of poverty that exist. Program resources are allocated Countywide based on low-mod areas which often coincide with areas of minority concentration.

Discussion

Not Applicable

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The shortage of affordable housing is a long-standing challenge that plagues many citizens across the nation. Rising housing costs, low inventory, high interest rates, and increased demand are several factors contributing to this crisis. A limited supply of decent affordable housing options was identified as an impediment to Fair Housing Choice and was a recurring theme among all discussions during the planning period. Households with low and very low incomes are the most vulnerable and tend to be at a greater risk of being negatively impacted by this affordable housing deficit. As a result, affordable housing programs are designed to address the needs of this underserved population.

Gwinnett County uses various approaches to maintain, create, and improve the amount and quality of affordable housing throughout the County. For the Consolidated Plan, Gwinnett County prioritized the following housing activities with the goal of increasing the supply of decent affordable housing: housing rehabilitation (CDBG); down payment assistance (HOME); acquisition/rehabilitation/new construction (HOME); tenant-based rental assistance (HOME); short-term rent/mortgage/utility assistance (ESG); and homelessness prevention (ESG).

During this Action Plan period, Gwinnett County will administer homeownership, homeless prevention, and rent subsidy programs to preserve and increase access to affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	444
Non-Homeless	674
Special-Needs	0
Total	1,118

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	778
The Production of New Units	58
Rehab of Existing Units	5
Acquisition of Existing Units	7
Total	848

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

Discussion

One-Year Goals for the Number of Households to be Supported by Population Type

In FFY 2024, Gwinnett County will utilize a total of \$340,918.00 to serve approximately 444 households

who are homeless through its nonprofit partners that provide emergency shelter, street outreach activities, and rapid rehousing programs. The County will also provide rental assistance, new construction activities, and acquisition and rehabilitation of existing units for 848 households.

One-Year Goals for the Number of Households Supported by Program Type

In FFY 2024, Gwinnett County will utilize a total of \$366,197.00 to provide rental assistance to a total of 778 households. Of these households, 104 will be served with rental assistance through the HOME tenant-based rental assistance program (\$231,900.00) and 674 households will be served with rental assistance through the ESG homelessness prevention program (\$134,297.00).

The County will also utilize \$517,945.00 to produce eight new units of affordable housing through Habitat for Humanity. The organization will use home funds to purchase land for the future development of multifamily rental housing. Additionally, \$1,229,968.00 will be used to acquire land for the construction and rehabilitation of 58 units of affordable housing through its Affordable Housing Initiative and its nonprofit partners, Gwinnett Housing Corporation and Atlanta Neighborhood Development Partners. Lastly, the County will utilize \$100,000 to repair five homes for low-income homeowners through the County's own Homeowner Housing Rehabilitation program.

Affordable Housing Development Fund

In addition to the aforementioned grant programs, Gwinnett County will utilize \$18 million in additional funding to support and expand affordable housing development in FFY 2024. The Affordable Housing Development Fund are combined funds from the American Rescue Plan Act, State and Local Fiscal Recovery Funds, HOME Investment Partnerships Program – American Rescue Plan, and Emergency Rental Assistance program, and offers funding to facilitate the development of affordable housing units for households making at or below 65 percent of Area Median Income to help address the impacts from the COVID-19 pandemic.

Gwinnett County will use this funding to increase the housing stock through the issuance of twelve awards that will generate a total of 999 housing units, of which 78 percent will be affordable, thus benefiting low-income households. A total of 752 of these units will be for rental housing, 122 allocated towards homeownership activities, and the remaining 125 will be for the preservation of existing units. All of these affordable housing projects are slated for completion by the end of December 2026.

AP-60 Public Housing – 91.220(h)

Introduction

Having access to affordable housing is key to ensuring that low-income residents do not become cost-burdened by housing costs, including rent/mortgage and utility bills. “Cost burdened” is defined as spending more than 30% of monthly household income on housing costs, while “severely cost-burdened” is defined as spending 50% or more.

Public Housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. There are currently three public housing authorities (PHAs) operating in Gwinnett County: Lawrenceville Housing Authority, City of Norcross Housing Authority, and City of Buford Housing Authority. Combined, these PHAs manage a total of 446 Public Housing units in 18 locations throughout the County. Currently, the waiting lists for Buford, Lawrenceville, and Norcross Housing Authorities, along with the Georgia Department of Community Affairs, are closed with no identification of when the waitlists will reopen.

Cost burden disproportionately continues to affect lower-income households in Gwinnett County. According to HUD’s 2016-2020 Comprehensive Housing Affordability Strategy Data, a total of 90,900 Gwinnett County households that qualify as low-income are cost burdened. With a continued trend of rising severely cost burdened incomes, the most recent data reveals, 46% (41,695) of those households qualify as severely cost-burdened reporting incomes less than 50% of Area Median Income.

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

In FFY 2024, Gwinnett County will continue to work with the Lawrenceville Housing Authority for the renovation and construction of affordable units. Within the first half of 2024, the Lawrenceville Housing Authority’s nonprofit subsidiary, Gwinnett Housing Corporation has opened Hearthside and South Town Square apartment communities. Between the two properties, they will house 60 residents relocated from 60 of Lawrenceville Housing Authority public housing units. Gwinnett County PHAs will also independently seek additional funding resources to address public housing needs. PHAs will continue to provide housing assistance and social services to residents and will maintain efforts to implement additional programs if resources and funding allow.

In late 2023, Gwinnett County offered a notice of funding availability for its Affordable Housing Development Fund (AHDF). The AHDF offers funding to facilitate the development of affordable housing units for households making at or below 65 percent of Area Median Income to help address the impacts from the COVID-19 pandemic. In 2024, Gwinnet County awarded Walton Communities and Blue Ridge Atlantic Development funds to develop affordable units within the county. Both Walton Communities and Blue Ridge Development are development partners of the Norcross Housing Authority (NHA). In partnership with Walton Communities, NHA will redevelop its 44 public housing units into a 180-unit apartment community. In partnership with Blue Ridge Atlantic Development, NHA will develop a four-story senior living apartment complex consisting of 70 affordable units which broke ground in 2023.

An initiative that launched in 2023 and continues well into 2024, the Buford Housing Authority (BHA) along with community partners launched an initiative to newly construct 73 units and rehabilitate 70 units of BHA's housing stock, for a total of 143 affordable housing units. The renovation project includes replacing aging windows with energy efficient windows, the installation of tankless water heaters, kitchen cabinets, appliances, range hoods, newly remodeled bathrooms and other improvements.

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

Annually, residents residing in Gwinnett's public housing authorities are invited to contribute their insights to the formulation of yearly agency plans and other strategic planning documents specific to their communities. The Housing Authorities extend support by providing meeting space and technical assistance to resident advisory boards as issues are identified. Each resident is required to fulfill monthly service hours within their community or engage in an economic self-sufficiency program. Additionally, Resident Advisory Boards act as communication ambassadors to the housing authority by collecting feedback from tenants, sharing the needs and requests of current tenants with housing authority management and staff, helping public housing staff formulate annual agency plans, and acting as citizen advocates for the enforcement of the housing authority's policies and procedures.

The Lawrenceville Housing Authority has introduced supplementary initiatives through its nonprofit subsidiary, Gwinnett Housing Corporation (GHC), to broaden affordable housing development and preservation options. These initiatives encompass a transitional rental program designed for homeless residents in Gwinnett County and a first-time homeownership program tailored for existing public housing residents, facilitating their transition into permanent and sustainable housing. Additionally, GHC opened the doors of its Homeowner Resource Center which provides a centralized source for resources, education, and services for current and aspiring homeowners. Funding for these programs is sourced from HOME and CDBG grants administered by Gwinnett County.

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

HUD has not classified any of Gwinnett County's public housing authorities as "troubled"; therefore, Gwinnett County did not use any CDBG, HOME, or ESG funding to assist troubled housing authorities. All three of Gwinnett County's PHAs are classified as standard performers.

Discussion

Not applicable

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

Introduction

Gwinnett County's 2020-2024 Consolidated Plan identifies rising housing options for the homeless and at risk of homelessness as a vital priority. Long-term objectives include supporting emergency housing and supportive services, and the implementation of a coordinated entry system.

The FFY 2024 Emergency Solutions Grant allocation will fund emergency shelter and prevention services that are projected to assist over 1,000 beneficiaries. The identified projects target homeless individuals and families who shortfall the resources to independently regain reliable, safe, secure housing. Programs are designed to couple clients with the services necessary to ensure they shift from emergency shelters to transitional or permanent housing.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

Gwinnett County will utilize \$475,845.00 in FFY 2024 Emergency Solutions Grant funding for Emergency Shelter, Homelessness Prevention, Rapid Re-Housing, Street Outreach, HMIS, and the administration of the ESG Program. Funding for these programs is projected to benefit approximately 1,119 people. The funded projects are designed to help lessen the period of time the client experiences homelessness, improve their ability to secure stable housing, and prevent recurrent homeless episodes.

The following subrecipients have been allocated FFY 2024 Emergency Solutions Grant funding under **Emergency Shelter**:

Rainbow Village Inc: Allocated \$ 40,000 to serve 80 residents
The Partnership Against DV: Allocated \$ 50,000 to serve 176 residents
The Salvation Army: Allocated \$ 37,500 to serve 63 residents
Impact 46, Inc.: Allocated \$ 37,500 to serve 23 residents
Another Chance of Atlanta Inc: Allocated \$ 25,000 to serve 28 residents

The following subrecipients have been allocated FFY 2024 Emergency Solutions Grant funding under **Homelessness Prevention**:

Latin American Association, Inc.: Allocated \$ 45,000 to serve 470 residents
The Salvation Army: Allocated \$ 35,000 to serve 141 residents
Society of St. Vincent de Paul Georgia, Inc.: Allocated \$ 34,297 to serve 49 residents
Positive Impact Health Centers: Allocated \$ 20,000 to serve 15 residents

The following subrecipients have been allocated FFY 2024 Emergency Solutions Grant funding under **Rapid Re-Housing**:

The Salvation Army: Allocated \$ 25,860 to serve 6 residents
Another Chance of Atlanta Inc: Allocated \$ 20,000 to serve 18 residents
Overcomers House Inc: Allocated \$ 35,000 to serve 5 residents

The following subrecipients have been allocated FFY 2024 Emergency Solutions Grant funding under **Street Outreach**:

Council of Youth Anti-Drug Inc.: Allocated \$ 17,500 to serve 28 residents
Overcomers House Inc: Allocated \$ 17,500 to serve 18 residents

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

Gwinnett County currently awards its ESG entitlement funds to subrecipients for the operation of emergency shelters, provision of hotel/motel vouchers, financial assistance through rapid re-housing to become stably housed, street outreach activities, and homeless prevention programs to serve individuals and families. Some emergency shelters and homeless prevention programs are designed to focus their services on the needs of specific populations such as families, victims of domestic violence, persons being evicted, and persons with severe mental health disorders or substance abuse histories.

In response to the HEARTH Act and 24 CFR part 576, Gwinnett County, in collaboration with its subrecipients are working together to prevent homelessness by helping families remain within their communities and retain their current permanent housing or diverting people to permanent housing solutions. The first step in this process was to streamline the intake of homeless families seeking emergency shelter. The improved coordination will result in more families being diverted away from homelessness and more families exiting homelessness and being rapidly re-housed in permanent housing.

***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**

Gwinnett County continues to focus on devising and implementing significant changes to its homeless services delivery system. Presently, Gwinnett County funds 14 subrecipients: Another Chance of

Atlanta, Council of Youth Anti-Drug Inc., Impact 46, Latin American Association, Overcomers House Inc, Partnership Against Domestic Violence, Positive Impact Health Centers, Rainbow Village, Society of St. Vincent de Paul Georgia, Inc., and The Salvation Army.

The County will administer the Emergency Solutions Grant Program and oversee activities for homeless individuals and families. The County has identified access to permanent affordable housing as a priority during this Consolidated Plan period. Obtaining permanent housing for homeless individuals and families will shorten the length of time spent in emergency and transitional shelters.

Gwinnett County encourages collaboration with organizations to transition as many people as possible into permanent housing as quickly as possible. The County also supports the implementation of a coordinated entry process to assess and direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter -- until a first paycheck is received or a medical emergency has passed. Others, however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Due to limited resources, agencies need to eliminate duplication of effort by local agencies, both in intake and assessment procedures and in subsequent housing and supportive services. The Homeless Management Information System (HMIS) can be improved with common intake forms, shared data, effective assessment instruments and procedures, and ongoing coordination of assistance among community organizations.

***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.**

In 2024, all subrecipients funded through Gwinnett County Emergency Solutions Grant will participate in coordinated entry. These organizations provide emergency shelter, rental and utility assistance, food and clothing, and other homeless services to individuals, families with children, veterans, unaccompanied youth, and persons with HIV. Diversion to housing and services outside of the traditional homeless services system is an integral part of the Coordinated Access and Assessment program. One of the first interventions will be to determine if there are other housing options available to the household rather than accessing shelter through the homeless system. For example, family or friends that the client may be able to stay with while stabilizing their housing situation, which may be more beneficial for the household and simultaneously reserves homeless shelter resources for those with no other options.

Additionally, rapid rehousing assistance will be made available for those households with low to moderate barriers to housing in the form of move-in assistance and short-term rental subsidies. This assistance may be all that the household needs to regain and maintain their permanent housing. By

using the standardized assessment called the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) for individuals or for families, service providers are able to identify the level of barriers to housing. Agencies can then target the type of service intervention to best address those barriers, we are then able to reduce the amount of time that an individual or family is homeless and increase their ability to maintain their permanent housing. Gwinnett County works closely with the ESG subrecipients to assist in the connection to supportive service that helps to address housing, health, social services, employment, and education needs.

Discussion

Not Applicable

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

Introduction:

Gwinnett County has previously identified multiple barriers to fair housing choice through its Analysis of Impediments to Fair Housing Choice report. In it, eight impediments were identified along with recommendations. Descriptions of these impediments are provided below along with actions actively taken by the Housing and Community Development Division to remove or ameliorate these barriers:

- **Impediment 1: A Lack of Affordable Housing Supply**
 - Description of impediment: Gwinnett County lacks an adequate supply of affordable housing. This impediment is exacerbated by the combination of high land prices, restrictive zoning practices, land use, and development policies to create new affordable units, despite adequate demand.
 - Actions to remove or ameliorate the impediment: Gwinnett County's Housing and Community Development Division takes on numerous activities to promote affordable housing supply. First, Gwinnett County funds affordable housing development through partnership with subrecipients and Community Housing Development Organizations (CHDOs) through its HOME Investment Partnerships dollars. Second, Gwinnett County will be distributing \$18 million in awards to help develop affordable housing in multiple critical areas of the community. Third, Gwinnett County sponsors preservation of existing affordable housing through the Homeowner Rehabilitation Program. Fourth, Gwinnett County supports Low Income Housing Tax Credit (LIHTC) projects through letters of endorsement or HOME dollar investments.
- **Impediment 2: Housing Affordability/Cost Burden**
 - Description of impediment: Monthly housing costs have risen in the County, placing a burden on lower-income household. According to the aforementioned study, "29% of owners and 52% of renters spend more than 30% of their income on monthly housing costs."
 - Actions to remove or ameliorate the impediment: Gwinnett County will portion out various entitlement dollars and new funding sources to support affordable housing development and promotion of affordable housing through programming, such as through HOME-funded tenant-based rental assistance programs, CDBG-funded rehabilitation programs, and through ARPA-funded affordable housing development.
- **Impediment 3: Housing Accessibility/ADA**
 - Description of impediment: Accessible housing data is not widely available or of quality to make broad determinations; however, housing accessibility is still a concern within parts of the County that can be remediated through certain activities.
 - Actions to remove or ameliorate the impediment: At this time, Gwinnett County supports direct ADA compliance measures and modifications through the Homeowner Rehabilitation Program. Gwinnett County also has long-standing relationships with organizations that provide quality services aimed at promoting housing accessibility

such as Gwinnett Housing Corporation's Older Adult Home Modification Program.

- **Impediment 4: Public Transportation Infrastructure Needs**
 - Description of impediment: Gwinnett County continues to bolster its transportation infrastructure as the County grows in population; however, many areas of the County still lack access to public transportation.
 - Actions to remove or ameliorate the impediment: As Gwinnett implements transportation plans into action, affordable housing developments and activities can consider access to convenient transportation when selecting sites for project development, and can provide expertise to connection with community organizations, services, and affordable housing.
- **Impediment 5: Restrictive Zoning Provisions**
 - Description of impediment: Strict zoning policies can have adverse impacts, whether intentional or unintentional, on residents, and, in particular, residents part of minority groups. Previous County zoning code under the Unified Development Ordinance (UDO) provided regulations that were inconsistent with needs and/or types of projects the County and its residents wanted to undertake.
 - Actions to remove or ameliorate the impediment: Actions were recommended in the aforementioned report that led to redevelopment of the County's Unified Development Ordinance. Changes made should encourage development of missing middle housing and unique developments that can expand housing-choice and ensure further compliance with the Fair Housing Act.
- **Impediment 6: Deficiency of Fair Housing Education**
 - Description of impediment: Fair housing education can foster better decisions made by residents when purchasing property, renting, or engaging in housing systems. Additionally, education could remove barriers in public opposition to affordable housing as residents may lack understanding of the benefits of affordable housing.
 - Actions to remove or ameliorate the impediment: CDBG-entitlement funds received by Gwinnett County actively support fair housing education and housing counseling activities in the Community. Gwinnett County also has indirect relationships with various housing counseling agencies, and actively promotes benefits of housing education.
- **Impediment 7: Underserved Populations**
 - Description of Impediment: Populations within Gwinnett County may go underserved due to a lack of ability to communicate concerns and issues. Efforts should be taken to connect with all of Gwinnett County's communities and population sects.
 - Actions to remove or ameliorate the impediment: Gwinnett County's Housing and Community Development Division connects frequently with non-profit and community partners to determine needs of specific populations in the County through mandatory and non-mandatory consultations and public hearings. The aforementioned report additionally recommends the County take on active outreach and translation activities of notices, documents, and forms as well as expansion of collaboration with populations

to ensure service to all populations.

- Impediment 8: Pre-Requisites for Rental Housing
 - Description of Impediment: Renters with low-income, poor credit, and/or accessibility face heightened difficulty in finding rental units due to common rental requirements regarding income and/or credit. Additionally, costs of application fees and security deposits are burdensome to these groups.
 - Actions to remove or ameliorate the impediment: The Housing and Community Development Division sponsors many affordable housing developments and activities through its HOME Investments Partnerships Grant dollars to create affordable rental units. These rental units are required to keep a certain portion at or below 80% AMI requirements for tenants which helps to bridge the gap for low-income residents to rental units without potential pre-requisites. In addition, the Housing and Community Development Division leverages a portion of its Emergency Solutions Grant (ESG) towards Homelessness Prevention and Rapid Re-housing which subrecipient organizations can use to provide security deposit and application fee assistance to certain clients.

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:

The County has taken significant action to remove or ameliorate the negative effects of public policies as well, most recently through changes to the Unified Development Ordinance (UDO). These changes have removed or stripped back requirements often seen to be restrictive in nature, such as minimum square footage requirements and minimum parking space requirements. Additionally, the UDO also made changes to promote new types of developments within the County, including changes that should promote “missing-middle” housing. These housing types have been difficult or impossible to construct within the County because of previous zoning regulations, yet these types of properties (i.e., duplexes, triplexes, cottage court developments, etc.) act as intermediary types of developments between denser multi-family developments and single-family developments. These new developments should promote density as the County continues to grow despite a low percentage of available land and should provide more affordable options for lower-income families.

Discussion:

Not applicable.

AP-85 Other Actions – 91.220(k)

Introduction:

The Strategic Plan addresses the issue of meeting underserved needs through various initiatives. Several of these initiatives are proposed for funding in this Annual Plan including Affordable Housing Initiatives, Homeowner Housing Rehabilitation, and HOMEstretch Down Payment Assistance. The Housing and Community Development Division staff will host various workshops for subrecipients to provide an overview of program guidelines and expectations. These workshops will serve as an opportunity to network, share successes, troubleshoot issues, and to discuss best practices for utilizing HUD funding. In addition, open office hours and individual TA (Technical Assistance) sessions will be made available to CDBG, HOME, and ESG subrecipients.

Actions planned to address obstacles to meeting underserved needs

Gwinnett County will collaborate with community leaders, stakeholders, and local non-profit agencies to help remove obstacles to better meet the needs of the underserved population and improve service delivery. The County relies on agencies like the Gwinnett County Coalition for Health and Human Services and the Georgia Department of Community Affairs Balance of State Continuum of Care to help determine the needs and capture data on underserved populations in Gwinnett County. Gwinnett County will support the expansion of HMIS technology beyond homeless service providers as a way to link the various categories of services provided by our partner non-profit organizations and standardize performance measures. The County will also review and analyze the work of its various departments and divisions to find opportunities for collaboration between similar programs. The Housing and Community Development Division staff will also ensure that all fair housing education materials are current and compliant with the Affirmatively Furthering Fair Housing Final Rule.

Actions planned to foster and maintain affordable housing

Gwinnett County will actively work to address the need for more decent and affordable housing by prioritizing the investment of funds into all of its housing programs. The Housing and Community Development Division is currently carrying out the Affordable Housing Initiative to address homelessness and affordable housing needs throughout the County. Coordination and collaboration among non-profit housing developers such as Atlanta Neighborhood Development Partnership, Gwinnett Habitat for Humanity, and Gwinnett Housing Corporation help the County maintain its affordable housing stock. In the interest of preserving affordable housing, the County will continue to support the use of HOME program funds for activities such as down-payment assistance, land acquisition, TBRA, and single/multifamily acquisitions and rehabilitation. Additionally, the County will continue to utilize CDBG program funds to rehabilitate owner-occupied homes. In an effort to promote fair housing choice, the County will encourage and support fair housing rights for all and provide

program funds to conduct outreach and education regarding the Fair Housing Law act of 1968.

Actions planned to reduce lead-based paint hazards

Gwinnett County will actively implement countermeasures to reduce lead-based paint hazards by abating or removing lead-based paint hazards found in existing housing built prior to 1978. Individuals who reside in properties built prior to 1978 and receive assistance through CDBG, ESG, HOME, or NSP grant programs are required to be inspected for lead-based paint hazards. These inspections are completed by a HUD Certified Inspector in accordance with HUD and Environmental Protection Agency (EPA) guidelines. Gwinnett County educates the public on the hazards of lead-based paint and how to protect children, the elderly and pets. In response to lead-based paint hazards and the limited resources available, the County has planned a steady, long-term response in accordance with Federal lead-based paint standards, other applicable federal regulations, and local property standards. Policies and procedures for abatement of lead hazards have been established in Gwinnett County, which include determining cost-effectiveness for abatement and procedures for assessing, contracting, and inspecting post-abatement work. The policies and procedures also include preparing work write-ups and cost estimates for all income eligible persons in Gwinnett County with identified lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

Gwinnett County will continue to expand its efforts to implement anti-poverty strategies for the citizens of Gwinnett. The County will strive to grow its efforts in providing relief for homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low-to-moderate-income persons.

The County will employ the following strategies to reduce the number of poverty-level families:

1. Support and promote the Entrepreneur Center's benefits, providing educational opportunities to local entrepreneurs to start businesses.
2. Support the collaborative efforts of the service providers in Gwinnett County to attract new business and industry to Gwinnett.
3. Support the efforts of the Gwinnett County Chamber of Commerce to target certain segments of the economy for business development/job creation.
4. Encourage nonprofit organizations to expand housing development programs to incorporate job-training opportunities as a part of their operations.
5. Promote the use of referral services for the existing Human Service Centers which involves a partnership with many human service agencies in Gwinnett, including job referrals.
6. Provide homeowners with housing repair assistance through the Homeowner Housing Rehabilitation program
7. Assist the County's CHDO (Atlanta Neighborhood Development Partnership) to acquire and construct

affordable rental housing for low/moderate-income persons.

8. Participate in the development of a regional social service collaborative to coordinate the work of social service organizations, disseminate news and information, eliminate duplication of efforts, and spearhead community-wide solutions to local needs.

9. Use enhanced accomplishment data as a criterion in the evaluation of applications for ESG funding.

10. Support any expansion of local transit service and/or express transit service to Atlanta.

Through the initiatives described above, and in cooperation with the agencies and nonprofit organizations noted, the CDBG Program Office will continue to aid low and moderate-income persons of Gwinnett County over the next five years.

Actions planned to develop institutional structure

The Housing and Community Development Division office, (under the leadership of the Gwinnett County Department of Financial Services), is the lead agency that administers, plans, and manages all facets of the HUD grants for Gwinnett County to ensure that all aspects of the grant programs perform in a concerted manner. The Housing and Community Development Division office will work as the housing and community development liaison between County agencies, local public housing, participating cities, state agencies, and non-profit and community-based organizations. Gwinnett County recognizes the need to maintain a high level of coordination on projects involving other departments and/or non-profit organizations. This partnership guarantees an efficient use of resources with maximum output in the form of accomplishments. The CDBG Program Office will address gaps and improve institutional structure by using the following strategies:

- Reduce and/or alleviate any gaps in services and expedite the delivery of housing and community development improvements to eligible persons.
- Evaluate the procurement process and guidelines for all rehabilitation and construction projects.
- Coordinate projects among County departments and support ongoing efforts for County initiatives.
- Maintain a strong working relationship with the housing authorities based on the mutually shared goal of providing suitable housing for low- and extremely low-income persons.
- Work with and financially support community housing development organizations (CHDOs) operating in low- and moderate-income neighborhoods to build affordable housing for the elderly, veterans, and other special needs populations.
- Use established lines of communication to identify opportunities for joint ventures with agencies that provide funding to construct affordable housing and/or finance homeownership opportunities.

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

service agencies

Gwinnett County will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its citizens. Relationship building among the social services and housing agencies encourages referrals and creates a clear path for clients to move from homelessness, through to emergency shelter and transitional housing services, to affordable rental housing and homeownership opportunities. The Housing and Housing and Community Development Division office also encourages collaborative relationships amongst ESG and HOME-funded organizations to develop wrap-around services and to provide a more streamlined approach for clients. ESG subrecipients are encouraged to actively participate in the Gwinnett County Coalition for Health and Human Services to discuss the broad range of needs for families including affordable housing, fair housing education, literacy, public safety, and workforce development. Ultimately, this collaborative approach will assist in developing longer-term, sustainable solutions to the challenges clients face in maintaining their self-sufficiency and is critical to the success of the County's Consolidated Plan.

Lastly, the County is an active participant in the development and implementation of a coordinated intake system (Continuum of Care (CoC) program) that will provide a special focus through a diverse group of community organizations, homeless shelters, permanent affordable housing developers, supportive service providers, and target population groups to examine needs, re-establish priorities, and plan strategies. Through this collective process, housing and service providers were able to contribute ideas and strategies to the development of this Plan. The Department of Community Affairs (DCA) will serve as the Lead Agency for the CoC to ensure that access and the use of wrap-around services are supported and monitored in a cooperative, sustainable and systemic manner to avoid duplication of services within the County. These efforts are critical to the County to ensure local nonprofit organizations are connected with other agencies to match critical needs with resources available from local committed business partners.

Discussion:

Not Applicable

Program Specific Requirements

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

Introduction:

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.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

Gwinnett County does not use other forms of investment.

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:

Gwinnett County utilizes a recapture policy in compliance with 24 CFR 92.254. The affordability period is determined based on the amount of HOME Investment Partnerships Program funds invested into an individual project. HOME Regulations set three minimum tiers of affordability

periods.

When a homeowner chooses to sell or use the property for non-eligible HOME Program activities during the Period of Affordability, the full amount of the HOME Program Direct Subsidy shall be recaptured and repaid to Gwinnett County provided that net proceeds are sufficient. If net proceeds are insufficient to repay the total HOME investment due, only the actual net proceeds will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies. Recaptured funds shall be returned to the Gwinnett County HOME Trust Fund to reinvest in other affordable housing projects for low- to moderate-income persons.

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:

Gwinnett County's resale and recapture provisions ensure the affordability of units acquired with home funds in several ways. The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How Gwinnett County calculates the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a) (5) (i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded *Direct Subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

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:

Gwinnett County had no intention to use any of its HOME Program funds to refinance existing debt secured by housing that is rehabilitated with HOME Program funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
Not Applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
Not Applicable
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).
Not Applicable

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

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

Eligibility for Assistance

Each individual or family receiving assistance must first meet with case manager or intake personnel to determine the appropriate type of assistance to meet their needs. The household must be at or below 30% of Area Median Income (AMI), be either homeless or at risk of losing its housing and meet the following circumstances: (1) no appropriate subsequent housing options have been identified; and (2) the household lacks the financial resources and support networks to obtain immediate housing or remain in existing housing.

Homelessness Prevention Assistance

The target population for Gwinnett County will have the following risk factors:

- Sudden and significant loss of income
- Eviction within two weeks from a private dwelling
- Severe house cost burden (greater than 50% of income for housing costs)
- Pending rental housing foreclosure
- Credit problems that preclude obtaining housing

Rapid Re-Housing Assistance

The target population for the Gwinnett County rapid re-housing program will have the following risk factors:

Individual/family lacking a fixed, regular, and adequate nighttime residence:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Living in a public or private shelter that provides temporary living arrangements
- Exiting in an institution where an individual has resided for up to 90 days and resided in an emergency shelter or place not meant for human habitation immediately before entering that

institution.

Coordination

Gwinnett County will coordinate with the Continuum of Care (CoC) by attending the bi-monthly Continuum of Care meetings and monthly steering committee for the CoC. In addition to bi-monthly meetings, several committees also meet monthly to coordinate and establish policies.

Determining and Prioritizing Eligibility

Persons at risk of becoming homeless will need to show they will become homeless if they do not receive ESG Homeless Prevention funds and suffered an economic hardship to become at risk of losing their home. There must be documented evidence in the client files that determine:

- Lack of financial resources.
- No other housing options.
- No support networks.

Client Share of Rent and Utility Costs

When a provider determines that a household is a priority for either Homeless Prevention or Rapid Re-housing rental assistance, they will be eligible to receive up to 100% rental assistance for no more than the full amount of the rent stated on the lease.

Short-Term and Medium-Term Rental Assistance Duration

The County requires short-term and medium-term rental assistance to allow individuals and families to remain in their existing rental units or to help them obtain and remain in the rental units they select. A lease must be in place in the program participant's name to receive assistance. Short-term rental assistance can only be used for three (3) months while medium-term rental assistance ranges from four (4) to 24 months and participants must be evaluated every three (3) months to determine the amount of assistance needed. Rental assistance may pay up to six (6) months of rental arrears however, the six (6) months count towards the 24-month total and cannot exceed the actual rental cost, complying with HUD's standard of "rent reasonableness." Rental payments cannot be made on behalf of eligible individuals or families at the same time and for the same cost types that are being provided through another federal, state, or local housing subsidy program.

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

The Georgia Balance of State Continuum of Care has not formally developed a coordinated assessment system; however, Gwinnett County – in conjunction with the Balance of State CoC – and the Georgia Department of Community Affairs are utilizing the same ESG forms as a first step toward developing an outreach and intake system.

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

The Gwinnett County Housing and Community Development Division publishes a notification of funding availability in the Gwinnett Daily Post, the local newspaper, to announce the availability of program funds. Application notices are also emailed to the Housing and Community Development Division's wide network of stakeholders and posted on the Gwinnett County website for organizations to download and apply for funding. These applications are then reviewed by an applications rating committee for conformance with the program requirements, qualifications of applicants, availability of matching funds, and other factors. The applications committee makes recommendations to the Gwinnett County Board of Commissioners for final approval of funding allocations.

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

The Gwinnett County Housing and Community Development Division requires subrecipient organizations to include homeless or formerly homeless individuals on the Board of Directors or other equivalent policymaking entities. Non-profit organizations recommended for PY2023 funding have procedures in place for homeless or formerly homeless persons to be involved with the program design and implementation.

5. Describe performance standards for evaluating ESG.

Performance standards provide a measure for Gwinnett County to evaluate the effectiveness of each ESG service provider in the areas of (a) Targeting those who need assistance most; (b) Reducing the number of people living on the streets or in emergency shelters; (c) Reducing the time people spend homeless; and, (d) Reducing clients' housing barriers or housing stability risks.

Gwinnett County will evaluate each ESG service provider's performance based on the following standards:

1. Subrecipients will develop and adhere to priorities for service delivery by need.
2. Subrecipients will assist clients swiftly to permanent housing from shelters or on the street.
3. Subrecipients will ensure that clients have easy access to services
4. Subrecipients will provide comprehensive case management to address a spectrum of needs for each client.