



STRATEGIC PLAN

Given the broad range of needs and the limited amount of resources available, the County can only meet a portion of the needs within the community. For the purpose of the Consolidated Plan, the needs identified as "high priority" are those that the County plans on addressing with available federal funds over the next five years.

This portion of the plan identifies the County's high priority needs and how it plans to address them over the next five years. This includes identifying available resources (Anticipated Resources), who will carry out the activities (Institutional Delivery Structure), and how the conditions of the market will influence the County's actions (Influence of Market Conditions). This section also describes plans to address specific issues required by the regulations, including barriers to affordable housing, lead-paint hazards, and anti-poverty measures.

Given the variables above, the County sets goals that will be used to measure performance over the term of the plan. It should be noted that it is difficult to estimate the funding levels for the HOME and CDBG program for the term of the Consolidated Plan. Given this, the goals listed in the plan are based on the assumption that funding will remain relatively stable over the term of the plan.

GEOGRAPHIC PRIORITIES

Under the CDBG and HOME Program, Lake County has jurisdiction for the entire county except for Hammond, Gary, and East Chicago. The Urban County serves the unincorporated areas of the county and the following municipalities:

Crown Point	Merrillville
Cedar Lake	Munster
Dyer	New Chicago
Griffith	Schererville
Highland	Schneider
Hobart	St John
Lake Station	Winfield
Lowell	Whiting

CDBG Funding Distribution

The County did not set priorities for specific geographies within its jurisdiction. The County utilizes a formula based on population to distribute CDBG funding to each of participating municipalities. Under the current distribution, each municipality receives CDBG funding every other year.

HOME Funding Distribution

HOME funding is not distributed to the participating municipalities. HOME funds are used throughout the Urban County jurisdiction and awarded to projects based on merit.

LOW AND MODERATE INCOME AREAS

It should be noted that CDBG-funded activities that qualify for funding by meeting the Low Mod Area (LMA) national objective will be limited to service areas where at least 42% of the population are considered to be low or moderate income. A set of maps depicting eligible areas is included in Appendix C.

This section addresses the requirements of 24 CFR 91.215(a)(1).



PRIORITY NEEDS

The results of the needs assessment, citizen outreach, and consultation process indicate the needs of the community have not significantly changed from the last five year plan. The most pressing needs continue to be substandard condition of housing, housing affordability, homelessness, at-risk youth, and non-homeless special needs populations, especially the elderly.

1. SUBSTANDARD OWNER HOUSING STOCK

Approximately 75% of the owner-occupied housing within the County’s jurisdiction was built before 1989. Low and moderate income homeowners may find it difficult to maintain the condition of older units. According to the most recent CHAS data, about one of every four homeowners within the County has a HUD-defined housing problem and more than half (56%) of low and moderate income homeowners within the County have a housing problem. This need is pervasive at all income levels and for all family types.

2. HOMEBUYER AFFORDABILITY

Cost burden remains an issue for a large number of homebuyers. Through the administration of its homebuyer assistance program, the County has realized the large

volume of need in the area and the effectiveness of making homeownership more affordable.

3. SPECIAL NEEDS HOUSING

The County has identified a need for special needs housing for persons who are not homeless but require wrap-around or supportive services. For some in this special needs population, permanent supportive housing (PSH) is the only viable long term housing option as the client is not able to sustain independent living. Options include supervised apartments, supported living housing, skill development homes, and family care homes. A larger community issue that adversely affects housing choice for persons with disabilities is the lack of public transportation options.

4. HOMELESS PREVENTION

Homeless Prevention is designated as a high priority as the County feels the prevention is an effective methods for combating homelessness in terms of cost and outcomes. The use of funds for prevention can eliminate the trauma of homelessness all together.

This section addresses the requirements of 24 CFR 91.215(a)(1).

PRIORITY NEEDS

5. SPECIAL NEEDS FACILITIES AND SERVICES

The County feels the use of funds for supportive services, such as transportation, that allow persons with disabilities to integrate within the community and for seniors to “age in place” is an effective use of funds that can substantially improve the living situations for these residents.

6. BLIGHT ELIMINATION

Blighted and abandoned properties are a threat to the health and safety of residents in the area.

7. AT-RISK CHILDREN

The County has identified the needs of at-risk children as a high priority. This includes abused and neglected children and children in families in need of pre-k education.

8. PUBLIC FACILITIES AND IMPROVEMENTS

The County and the participating municipalities are focused on improving the quality of life for all residents, especially those who face accessibility issues. The County has identified the improvement

of public facilities and ADA improvements as a high priority.

9. FAIR HOUSING

The County recently updated its fair housing plan in 2017. The County is committed to affirmatively further fair housing and will utilize resources available through this plan to carry out the proposed goals outlined in the Analysis to Impediments of Fair Housing Choice (AI).

10. PUBLIC HOUSING

Public housing is assigned a low priority relative to the other affordable housing and community development needs. No public housing developments exist within the County jurisdiction.

This section addresses the requirements of 24 CFR 91.215(a)(2).

INFLUENCE OF MARKET CONDITIONS

TENANT-BASED RENTAL ASSISTANCE

The cost of rental housing within the market is reasonable for most income levels, but it is too high for a number of residents within the County at the lowest incomes. A minimum wage earner, earning \$7.25 per hour, must work approximately 80 hours per week every year to afford a one bedroom apartment or 95 hours per week to afford a two bedroom set at the average Fair Market Rent proposed by HUD.

According to the latest CHAS data, over 5,000 renter households have a severe cost burden where more than half of their incomes go to toward housing costs. This level of need supports the use of funds for tenant-based rental assistance.

Monthly Supplemental Security Income (SSI) payments, a common form of income for persons with special needs, for an individual average \$733. At this amount, \$220 in monthly rent is affordable. The one-bedroom FMR accounts for nearly all the renter's income, leaving no money for other needs such as food and transportation. Based on this data, there is clearly a market-based need for tenant-based rental assistance for persons with special needs.

PRODUCTION OF NEW UNITS

There a number of developable lots available for in-fill development. The current market shows there is a strong demand for new housing and housing in standard condition within the County. Given the lack of private development, the County may need to offer development subsidy incentives to make new unit production feasible.

REHABILITATION

The age and condition of existing housing stock within the County clearly speaks to the need for rehabilitation.

ACQUISITION

Based on information obtained from local realtors, the median sales price in the area is \$158,000. Overall, ownership of a home in standard condition is within reach of some income-eligible homebuyers. The availability of small subsidies should be able to increase the size of potential income-eligible homebuyers.

This section addresses the requirements of 24 CFR 91.215(b).

ANTICIPATED RESOURCES

The main source of funding for the goals, programs, and projects discussed in this Consolidated Plan will come from the Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME).

SOURCE	CDBG	HOME	TOTAL
Annual Allocation	1,498,812	669,416	2,168,228
Five Year Estimate	\$7,500,000	\$3,500,000	\$11,000,000

COMMUNITY DEVELOPMENT BLOCK GRANT

The Community Development Block Grant (CDBG) funds received by the County can be used for a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and improved community facilities and services, provided that the activities primarily benefit low- and moderate-income residents. Some examples of how the County has used CDBG funds in the past include:

- ◆ Housing rehabilitation for income-eligible homeowners,
- ◆ Homeless prevention,
- ◆ Social service programs for youth and seniors,
- ◆ Clearance and demolition of blighted structures, and
- ◆ Public facility and infrastructure improvements.
- ◆

COUNTY REVOLVING LOAN FUNDS

The Lake County Economic Development Commission maintains a revolving loan account that provides short-term financing to establish or expand industrial and commercial businesses. The goal of the assistance is to create permanent jobs where at least 51% of the jobs are made available to low and moderate income persons.

This section addresses the requirements of 24 CFR 91.215(a)(4), 91.220(c)(1) and (2).

ANTICIPATED RESOURCES

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

The HOME Investment Partnerships Program (HOME) funds received by the County must be used for affordable housing projects. Beneficiaries of HOME-funded projects must earn less than eighty percent of the area median income. Eligible types of activities include:

- ◆ Rehabilitation of existing affordable housing,
- ◆ Acquisition or development of new affordable housing, and
- ◆ Tenant-based rental assistance.

LEVERAGING

The County expects to generate HOME Match credit through investments made by its CHDO in HOME-assisted units and also in the other development projects.

AVAILABLE PROPERTY

The County and the participating municipalities, through their redevelopment commissions, are able to obtain vacant and abandoned properties and provide them to potential developers for re-use. The County is also supporting the development and growth of a local land bank to address the issues of vacant and abandoned properties.

INSTITUTIONAL DELIVERY STRUCTURE

The Lead Agency for the planning and administration of CDBG and HOME is the Lake County Community Economic Development Department.

As an Urban County, a large portion of funds are distributed to participating cities in order carry out funded projects.

A portion also remains with the County for distribution to unincorporated areas of the County, for countywide projects, and to non-profit service providers. The County also directly administers the HOME Program and works with a number of non-profit and for-profit housing developers to rehabilitate and

Urban County and Participating Municipalities
Lake County
Cedar Lake
Crown Point
Dyer
Griffith
Highland
Hobart
Lake Station
Lowell
Merrillville
Munster
New Chicago
Schererville
Schneider
St. John
Whiting
Winfield

Non-Profit Partners
South Lake Community Services
Northwest Indiana Community Reinvestment Alliance
Mental Health America
Children’s Treehouse

CHDOs and CDFIs
Habitat for Humanity of Northwest Indiana
IN-PACT
Community Investment Fund of Indiana
Northwest Indiana Community Action

construct affordable housing units. While the County does not currently utilize any Community Development Finance Institutions (CDFI), the County is in discussions to work more closely with an existing CDFI, Community Investment Fund of Indiana, and a potential CDFI, Northwest Indiana Community Action.

This section addresses the requirements of 24 CFR 91.215(k).

INSTITUTIONAL DELIVERY STRUCTURE

STRENGTHS AND GAPS

The County is fortunate to work within a strong network of capable government agencies and non-profit service partners. However, the level of needed services will remain high for the foreseeable future.

In the coming years, the County will work to strengthen the overall capacity of non-profit affordable developers and lenders who focus on community and economic development.

FIVE YEAR GOALS

1. IMPROVE OWNER HOUSING STOCK

The County will use available federal resources to support multiple rehabilitation programs, including Emergency Home Repair, and a Ramp Program for disabled residents. The County expects to benefit 100 low and moderate income homeowners for the term of the Consolidated Plan.

2. INCREASE HOME OWNERSHIP

The County will use HOME funds to provide down payment and closing cost assistance to (250) income-eligible homebuyers. The County will also subsidize the development of new homebuyer housing through partners such as Habitat for Humanity.

3. PROVIDE SPECIAL NEEDS HOUSING

The County will use HOME funds to support the development of assisted housing targeted at veterans and support the operation of IN-PACT, a certified CHDO who focuses on providing housing to special needs populations. While it is difficult to set a goal given the unknown nature and financing of future projects, the County estimates 10-HOME assisted units will be produced over the course of this plan.

4. PREVENT HOMELESSNESS

The County will use both HOME and CDBG funds to continue its Homeless Prevention Program. The goal is to assist 500 at-risk households avoid the trauma of homelessness.

5. IMPROVE PUBLIC SERVICES

The County will use CDBG funds to improve public services that primarily assist low and moderate income populations, including the elderly, disabled, and at-risk children. Over the course of the five year plan, the County estimates that 5,000 residents will receive a benefit.

This section addresses the requirements of 24 CFR 91.215(a)(4).

FIVE YEAR GOALS

6. IMPROVE PUBLIC FACILITIES AND IMPROVEMENTS

The County will use CDBG to subsidize the improvements to infrastructure in participating municipalities, including improvements to accessibility to ensure ADA compliance. The County estimates that will improve 40 facilities and infrastructure projects.

7. ELIMINATE BLIGHT

The County and Lake Station will use a portion of the CDBG funds to demolish and clear blighted properties that pose a threat to public health and safety. The propose goal for the term of the plan is the removal of 30 blighted properties.

8. PLANNING, ADMINISTRATION, AND CAPACITY BUILDING

The County will use available federal funds to comply with the planning, administrative, and reporting requirements associated with the HUD grants. A portion of funds may be granted to non-profit housing developers actively working within the County to cover a portion of their operating costs.

PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT

The County does not have a public housing authority within its jurisdiction. The only public housing authorities within Lake County are located in East Chicago, Hammond, and Gary.

Northwest Indiana Community Action (NWICA) operates the Section 8 Housing Voucher program within the County on behalf of Indiana Housing and Community Development Authority (IHCDA).

As part of this planning process, the County is required to describe actions to be taken to increase the number of accessible units where required by a Section 504 Voluntarily Compliance Agreement and describe the manner in which it will provide financial or other assistance to improve operations if the public housing agency is designated as troubled by HUD under 24 CFR part 902. As there are no physical public housing units with the County jurisdiction, these requirements are not applicable.

This section addresses the requirements of 24 CFR 91.215(c).

BARRIERS TO AFFORDABLE HOUSING

IDENTIFIED BARRIERS

HUD defines regulatory barriers as public processes and requirements that significantly impede the development of affordable housing without commensurate health or safety benefits. These barriers can raise development costs in some communities by as much as 35 percent. General opposition to affordable housing, often called “Not In My Back Yard” or NIMBY, was the underlying motive that lay behind many of these regulatory barriers to intentionally limit growth in general and affordable housing in particular.

In the 2017 fair housing study conducted by the County, a number of public policy barriers were identified as barriers to affordable housing that may also serve as impediments to fair housing choice. These include, zoning requirements for large lots and large homes, and public sentiment against multi-family housing and affordable housing in general complicates the availability of affordable housing in some of the communities and increase racial and economic disparities across the communities in the county. A limited supply of rental housing outside the entitlement cities (Gary, East Chicago, and Hammond) further reduces housing choice for people who are unable to secure a mortgage or disinterested in home ownership.

STRATEGY TO ADDRESS BARRIERS

1. Increase education opportunities for elected and appointed officials, real estate professionals, residential investors/landlords, and the general public about fair housing.
2. Increase awareness and implementation of universal design principles in housing construction and renovation.
3. Work county-wide and regionally to improve transportation choices and connection between areas of opportunity and housing.
4. Increase opportunities for mixed income housing options through policy changes in programs and land use policy.

This section addresses the requirements of 24 CFR 91.215(h).

HOMELESSNESS STRATEGY

The County is part of the Balance of State Continuum of Care (CoC) Region 1a and has adopted the local CoC strategies and priorities for the sections of this plan pertaining to homelessness. The CoC is an integrated community-based system, which identifies needs and resources, establishes, and maintains a seamless delivery of housing and supportive services for the homeless and enhances and creates opportunities to ensure that the people served will achieve personal stability, self-sufficiency, better housing, and an enhanced quality of life.

The actions described below include those that will be undertaken by the County and also efforts undertaken by the CoC with support from the County.

OUTREACH AND ASSESSMENT

A comprehensive referral network exists through the homeless service providers within Lake County. Most homeless households are referred from other agencies, including churches, school administrators, food pantries, hospitals and health care agencies, government offices, and other non-profit agencies.

The Continuum of Care conducts additional outreach through public events. The County, in partnership with the CoC, will participate in the annual homeless count to reach out to homeless persons that are outside of the

shelter system. The information gathered through the homeless count will help the County better assess methods to bring those outside of the shelter system into the continuum of services.

SHELTER NEEDS

While the current homeless strategies focus on the prevention and quick placement of homeless households into permanent housing, there will always be a need for emergency and transitional housing to provide temporary accommodations for persons forced into sleeping in places not meant for human habitation.

In the upcoming plan year, the County will continue to participate in the planning efforts of the CoC. The CoC supports a number of emergency and transitional housing facilities. These facilities can provide up to 240 emergency beds and 131 transitional housing beds.

TRANSITION TO PERMANENT HOUSING

In the upcoming plan year, the County will continue to participate in the planning efforts of the CoC. The end goal and outcome of the Continuum is to stabilize households who have experienced homelessness in permanent housing situations. Rapid Re-housing has proven to be an effective tool in

This section addresses the requirements of 24 CFR 91.215(d).

HOMELESSNESS STRATEGY

moving households from the shelter environment into permanent housing situations.

Some clientele will only be able maintain housing where wrap-around services such as medical care, career and mental health counseling are included. The County will continue to support the development of additional permanent supportive housing (PSH) units, such as the Veterans Village, Village of Hope, South Shore Commons, and Kirby Manor.

PREVENTION

In the upcoming plan year, the County will financially support its Homeless Prevention Program. The program is expected to serve and estimated 100 households at risk of homelessness.

The County will also to continue to participate in the planning efforts of the CoC. The CoC supports a number of prevention programs, as well as most of the Township offices. The County will outreach to the Township offices over the program year to better coordinate the use of resources.

DISCHARGE POLICIES

The following is a summary of the efforts made at the state level for the entire CoC. The Department of Health, the Department of Corrections, the Division of Child Services and the Division on Mental Health and

Addiction are all represented on the Indiana Planning Council on the Homeless.

Foster Care

The Chafee Plan is the basis for Indiana's protocol for implementing the Foster Care Independence Act of 1999. Components of the Indiana Plan address Independent Living Services for youth. The Division of Child Services conducts a comprehensive independent living assessment to identify areas of strength and challenges for youth age 14 to 18. Services provided include financial, housing, mentoring, counseling, employment, education, and other appropriate support to ensure youth live as healthy, productive and self-sufficient adults. The Planning Council and IHCD work closely with foster care to monitor data and trends on discharges and work with cases as necessary. IHCD and other local PHAs are applying for 200 FUP vouchers to assist high risk youth leaving Foster Care.

Health Care

The Indiana Department of Health (IDH) has a formal discharge plan developing a set of recommendations for an integrated, statewide discharge policy. IDH is on the Planning Council. The Bureau of Quality Improvement Services is responsible for ensuring that individuals transition from State operated facilities, large private ICF,

HOMELESSNESS STRATEGY

MR settings and nursing homes into a community smoothly. The process includes a minimum of one pre-transition visit and two post-transition visits. Individuals are also surveyed 6 months after transition regarding residential and support services. The CoC is currently working locally to develop discharge policies for health care systems. The Planning Council is including the Indiana Primary Health Care Association in our process to link PSH projects with primary health care centers and those discharged from emergency rooms.

Mental Health

The Indiana Department of Mental Health and Addiction (DMHA) has a formal protocol that it currently implements. In addition, the Planning Council developed and approved a set of recommendations for an integrated, statewide discharge policy in 2007. DMHA requires that the admitting mental health center remain involved in the treatment and discharge planning of individuals placed in State operated facilities. Facility staff, in conjunction with the consumer, develop the plan to ensure that the individual is not released into homelessness. The formal protocol for individuals being discharged from the State Institutions of Care is under statute IC 12-21-2-3 and has been implemented since 2004.

Corrections

The Indiana Department of Corrections (IDOC) has a formal discharge policy that it currently implements as described below. IDOC is represented on the Planning Council. CoCs work closely with IDOC reps to develop protocols so that individuals being released from correctional facilities are not discharged into homelessness. IDOC requires case managers to develop individualized Re-Entry Accountability Plans that outline and coordinate the delivery of services necessary to ensure successful transition from incarceration to a community.

Services include but are not limited to:

- 1) enrollment in Medicaid, Food Stamps, TANF, and SSI;
- 2) issuance of birth certificates and BMV identification;
- 3) participation in workforce development programs;
- 4) limited rental assistance; and
- 5) referral to other community services.

This section addresses the requirements of 24 CFR 91.215(d).



LEAD BASED PAINT STRATEGY

Many homes built before 1978 have lead-based paint. The federal government banned lead-based paint from housing in 1978. Lead is especially dangerous for pregnant women and households with children under the age of six. Lead poisoning is one of the most widespread environmental hazards facing children today and is considered to be the most serious environmental threat to children's health.

Research shows that blood lead levels of 10 micrograms per deciliter of blood ($\mu\text{g}/\text{dL}$) in young children can result in lowered intelligence, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and antisocial behavior. However, there currently is no demonstrated safe concentration of lead in blood, and adverse health effects can occur at lower concentrations.

In 1976-1980 the average child, regardless of family income, had an elevated blood lead level (i.e. concentrations greater than 10 $\mu\text{g}/\text{dL}$). However, children living in families with incomes below the poverty line had higher average blood lead concentrations than those living in families with incomes at or above the poverty line. This disparity continues through to present day. National studies have shown that for all income levels, non-Hispanic African-American children had

a greater risk of elevated blood lead levels than white children. However, the disparity is greater for African-American children who live in families with incomes below the poverty line.

Today, high blood lead levels are due mostly to deteriorated lead paint in older homes and contaminated dust and soil. Soil that is contaminated with lead is an important source of lead exposure because children play outside and very small children frequently put their hands in their mouths.

According to the 2009-2013 ACS, there are 73,328 housing units built prior to 1980 in the Urban County jurisdiction. Of those, 51,880 are owner-occupied and 15,517 are renter-occupied.

In Indiana, county health departments have the primary responsibility of lead testing, lead case management, and lead risk assessments. Currently, the Lake County Department of Health (LCHD) administers the local lead screening program. The Department conducts tests on an as-needed basis and as requested. Testing is not mandatory except for children receiving Medicaid.

According to CDC data for 2015, only 1,183 children in Lake County were tested. Given this, it would be beneficial to expand testing efforts through coordination with agencies that provide services to families with young

This section addresses the requirements of 24 CFR 91.215(i).

LEAD BASED PAINT STRATEGY

children, including Head Start, Early Learning Partnerships, and Women, Infants and Children (WIC).

The County is not taking any stand-alone action to specifically address lead paint or lead poisoning hazards. Instead, the County will address lead-based paint on a case-by-case basis for the housing units assisted through its housing programs. The County will ensure all of its federally-funded housing programs are in full compliance with the lead-based paint hazard regulations (24 CFR Part 35). This includes assisting households with the appropriate lead-based paint inspection, testing, and abatement of lead-based paint hazards. The County will provide education through the distribution of lead-based paint information and literature and will seek greater coordination with state agencies to leverage additional resources.

In April 2010, EPA extended current requirements regarding lead-safe work practices to cover most pre-1978 housing and require renovation firms to perform quantitative dust testing to achieve dust-lead levels that comply with EPA's regulatory standards. The County will work with its contractors, subrecipients and community partners to ensure all funded programs are in full compliance with the updated regulation.

ANTI-POVERTY STRATEGY

According to the 2018-2012 ACS Estimates, the County as a whole has an overall poverty rate of 18%. However, only a third of the County's poor resides outside of Gary, Hammond and East Chicago. The poverty rate for the Urban County is nine percent compared to a rate of 31% for the aggregate of the three cities.

Working age adults form the majority (55%) block of the Urban County's poor. Children compose the second largest demographic. Approximately 35% of the Urban County's poor population are under 18 years of age. Children live in poverty. Seniors, in contrast, are less likely to be in poverty. Seniors account for 9 percent of the poor. Only 6% of seniors were below the poverty level.

There are significant disparities in the poverty rates for different racial and ethnic group. The poverty rates for Whites, Hispanics, and African Americans are 7%, 14%, and 21% respectively.

There is a high correlation between low levels of educational attainment and poverty. For adults over 25, the poverty rate for those with no college experience was 10% } compared to those with at least some college experience was 5%. Employment is not a guarantee to rise a family out of poverty. Nearly two thirds of those in poverty over the age of 16 were employed.

While the discussion of anti-poverty is important, there is a large gap between the poverty level and what is considered a "living wage" in the County.

Given the statistics stated above, the County's efforts to reduce the number of poverty-level families should focus on support services, such as child care, educational support and job training programs to obtain living wage jobs, to single-parent households to ensure residents finish high school or obtain high school equivalency and obtain some college coursework or vocational training as well.

When feasible, the County will provide job training, employment, and contract opportunities for public housing residents and other low- and moderate-income residents in connection with construction projects funded under the Consolidated Plan. This provision helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. In this way, the County will comply with Section 3 of the Housing and Urban Development Act of 1968. The County has set the following goals in relation to its Section 3-covered projects: (1) thirty percent of new hires will be Section 3 residents, and (2) ten percent of all Section 3-covered contracts will be awarded to Section 3 businesses.

This section addresses the requirements of 24 CFR 91.215(j).



MONITORING

The primary purpose of the monitoring strategy is to guarantee all projects funded through the Consolidated Plan comply with applicable federal regulations. The monitoring strategy will ensure projects are effectively meeting their stated goals in a timely manner, provide a reporting mechanism to communicate performance, and maintain a high level of transparency and accountability.

The monitoring process will begin with the approval of the annual budget and continue until final closeout of each project. The process can be divided into the following tasks: Desk Review, Annual Onsite Monitoring, Audit Review, and Affordability Monitoring.

Desk monitoring is the process of reviewing documents throughout the program year, including pay requests and periodic accomplishment reports, to gauge compliance. The County will review pay requests and periodic reports upon submittal. If issues arise with a pay request, staff will work quickly with the subrecipient or contractor to resolve the issues and process the payment.

For each pay request, the County will base approval on a number of elements, including budgeted amount, eligibility, allowability, applicability, reasonableness, and adequate source documentation. If the review reveals

one or more areas is lacking, the pay request will be returned to the organization that made the request for clarification, correction, or additional documentation as appropriate. If the review reveals the request is unallowable per the OMB standards or federal regulation, the County will return the request to the organization with an explanation as to why the payment was disallowed.

ANNUAL ONSITE VISITS

The County will conduct more in-depth onsite monitoring visits of funded organizations as well. The purpose of the onsite monitoring visit is to conduct an in-depth review of all aspects of the funded project and to provide technical assistance to subrecipient staff, if necessary. During the visit, staff will utilize the appropriate checklists from the Grantee Monitoring Handbook of HUD's Office of Community Planning and Development and the LCCEDD Policies and Procedures Manual. The County will maintain detailed notes on the checklists on which to base their conclusions.

SUBRECIPIENT AUDITS

When applicable, the County will require submittal of audits per 24 CFR 200. All

This section addresses the requirements of 24 CFR 91.230.

MONITORING

subrecipients must submit their audit to the County within thirty days of receipt of the auditor's report. Upon receipt of the audit, the County will review each audit to identify any areas of concern. If the County identifies any potential areas of non-compliance, staff will schedule an on-site monitoring visit as described above to assist in the correction of all relevant findings.

AFFORDABLE HOUSING

The County will follow internal procedures to ensure compliance with rent and occupancy standards for completed HOME-funded projects. As part of its monitoring strategy, the County will review its policies and procedures from the proposal process to project closeout and long-term affordability monitoring to make necessary updates based on changes to regulatory policy and new federal guidance.