



**Consolidated Annual Performance and
Evaluation Report for
Montgomery County, Maryland**

**Program Year 2017 / County Fiscal Year 2018
July 1, 2017 - June 30, 2018**

**ISIAH LEGGETT
COUNTY EXECUTIVE**

**CLARENCE J. SNUGGS
DIRECTOR, DEPARTMENT OF
HOUSING AND COMMUNITY AFFAIRS**



Any questions should be directed to:
Matthew Greene, 240-777-3631
The TTY number (for the hearing impaired) is
240-773-3556

Note on the Draft

The U.S. Department of Housing and Urban Development (HUD) now requires all jurisdictions to draft and submit Consolidated Annual Performance and Evaluation Reports (CAPER) via the internet. This draft document, not including the cover page and selected details, such as this note, is the product of an export to Microsoft Word from the online submission software, for the purpose of making the Plan accessible to the public. The information is highly organized and designed to meet all federal requirements as well as produce more standardized plans across jurisdictions. It also allows for more automated data capture by HUD and therefore more robust analysis and reporting of activities for all geographies.

The CAPER is intended to automatically tie in to the appropriate Consolidated Plan data; however, some of that connection was not made or was prone to errors. HUD has provided direction on how to address known flaws, generally by compiling information found in local sources and / or submitted to HUD through its Integrated Disbursement and Information System (IDIS) and then entering it into this Word document. There may also be some minor undetected flaws such as the formatting of exported text. Staff have attempted to correct these errors in the draft. After the draft review period, all of the information in this document will be submitted electronically via the online CAPER screens provided by HUD.

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Citizen Participation Plan

Emergency Solutions Grant Rapid Re-housing Manual

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

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

Overall strategic plan goal levels for years 4-5 are stable and reasonable given that federal funding levels remain stable and projects costs haven't escalated unexpectedly. Public service grants, on the other hand, can have greatly varying numbers of expected beneficiaries. Projects in Program Year 2017 ranged from a high of 2,300 expected beneficiaries to a low of just eight, with the average being 287. This means that the level of service per person or per dollar varies greatly, but more importantly, the goals are much lower than the first year's projects, meaning that it will likely be impossible at this point to match the five-year plan goals, which were based on a first year that had very high numbers of expected beneficiaries. Of the 13 public service contracts, none were extended for time and one would-be grantee's project was cancelled prior to inclusion in the Action Plan due to grantee capacity issues.

The Focused Neighbor Assistance program has provided common area improvements for the McKendree neighborhood located in Montgomery Village. Construction was completed in May 2018 at a total cost of \$640,000. A total of 212 households benefitted from these enhancements

Home funds were used for the construction of 12 affordable senior rental units. Additionally, four units were acquired to house multiple individuals with psychiatric disabilities.

CDBG funds were used for several housing related activities. The largest project was the acquisition and development of a 40-unit affordable housing rental apartment. The project has 25 affordable units and 15 market rate units. Of the 25 affordable units 15 will be CDBG designated units. Three group homes, housing six persons with developmental disabilities and extremely low incomes, were rehabilitated using CDBG funds.

CDBG funds were used during Program Year 2017 for housing code inspections. 6,953 housing code inspection cases were open during the Program Year, of which, 99% were successfully geocoded using ESRI's ArcGIS software to determine the number falling within CDBG eligible areas of the county. The result was that 2,498 cases were in CDBG areas, or about 36% of all cases successfully located.

ESG funds were used for Rapid Re-housing Support Services and Tenant Based Rental Assistance for 33 households. ESG funds were also used to provide emergency shelter overflow housing in motels for 279 families. This exceeded the goal of serving 150 families in emergency shelter due

to using more funds for overflow shelter than was expected.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$0/ HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		2300	0	0.00%
2. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$304,485 / HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	1000	212	21.20%	373	212	56.84%
3. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$0/ HOME: \$1,700,000	Rental units constructed	Household Housing Unit	195	111	56.92%	0	30	
4. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$60,000 / HOME: \$0	Rental units rehabilitated	Household Housing Unit	275	282	102.55%	122	27	22.13%
5. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$184,869 / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	125	66	52.80%	58	5	0.00%

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6. Affordable Housing in an Inclusive Community	Affordable Housing	CDBG: \$22,601 / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		8	8	0.00%
7. Prevent and End Homelessness	Homeless Non-Housing Community Development	CDBG: \$31,643 / ESG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	85115	14320	16.82%	0	12	
8. Prevent and End Homelessness	Homeless Non-Housing Community Development	CDBG: \$ / ESG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	100	34	34.00%			
9. Prevent and End Homelessness	Homeless Non-Housing Community Development	CDBG: \$ / ESG: \$224,889	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	100	77	77.00%	22	0	0.00%
10. Prevent and End Homelessness	Homeless Non-Housing Community Development	CDBG: \$ / ESG: \$84,076	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	750	812	108.27%	150	0	0.00%
11. Promote Healthy and Sustainable Neighborhoods	Affordable Housing Non-Housing Community Development	CDBG: \$371,507	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6760	2960	43.79%	4950	1,914	38.69%
12. Promote Healthy and Sustainable Neighborhoods	Affordable Housing Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	25	10	40.00%			

13. Promote Healthy and Sustainable Neighborhoods	Affordable Housing Non-Housing Community Development	CDBG: \$203,611	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	3700	5146	139.08%	740	2,498	338.57%
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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

The three Goals of the Five-Year Plan’s Strategic Plan are all high priorities and use CDBG, HOME, and ESG funds to address a wide range of community needs, including housing assistance, public services for low-income residents, and homelessness prevention, rapid re-housing, and emergency shelter services.

IDIS report PR-23 CDBG Summary of Accomplishments shows that 4.62 million dollars were disbursed during the program year. Housing and acquisition of land for housing accounted for 50% of this, Public Facilities and Improvements 17%, and Public Services 13%.

The highest priority for the use of HOME funds is the creation/preservation of affordable housing. To this end all funds were used for this purpose.

All ESG funds were used for activities that addressed needs of homeless persons, focusing on rapid re-housing, and shelter services activities. In addition, funds were also used to support the CoC’s HMIS system.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG
White	250	14	177
Black or African American	227	15	693
Asian	65	5	9
American Indian or American Native	3	0	2
Native Hawaiian or Other Pacific Islander	1	0	0
Total	546	34	881
Hispanic	236	6	164
Not Hispanic	310	28	792

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

Narrative

CDBG data from IDIS report PR23 – CDBG Summary of Accomplishments shows that a total of 20,530 persons were served – higher than the total shown above in CR-10. This is due to other racial categories included in PR23, but not included in CR10, most notably there were 14,059 “other multi-racial” persons included in PR23. All HOME and CDBG data was pre-populated in the CAPER. ESG had 91 people with either multiple race or no race indicated and 14 not indicating Hispanic or Non-Hispanic status.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	Federal	4,659,199	4,615,940
HOME	Federal	1,903,056	970,956
ESG	Federal	367,993	471,813

Table 3 – Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
None			

Table 4 – Identify the geographic distribution and location of investments

Narrative

There are no target areas for investment. Most activities are oriented to low-income clients. Code enforcement activities are conducted countywide; CDBG funds are used for code enforcement activities occurring only within CDBG eligible areas, as determined by HUD.

Leveraging

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

The County was able to leverage federal funds at a rate of approximately 5:1 by using County, State and private funds. Although federal funds have been declining in recent years, County, State, and private funds have also been declining and have been doing so at similar rates. All match requirements for the HOME and ESG programs were more than met by local spending.

Three projects utilizing public land for affordable housing moved forward during the Plan year: 1) Sligo Police Station - this re-use of the former 3rd district police station will provide 68 artist live-work units, with 61 of the units being affordable along with 11 for-sale townhomes, of which seven will be designated as workforce affordable housing. It expects to close financing in fall 2018. It has been renamed Artspace Silver Spring Lofts. 2) White Oak, renamed Victory Crossing was completed as of July 2018 and currently has an estimated 70 percent occupancy. This project co-located 105 affordable senior housing units with the new 3rd District Police station. 3) East County – progress continued during the plan year with the co-location of 60 affordable and 61 market-rate units with County facilities. This project is also expected to close its financing in the fall of 2018.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$115,867,590.68
2. Match contributed during current Federal fiscal year	\$4,944,347.05
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$120,811,937.73
4. Match liability for current Federal fiscal year	\$194,571.75
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$120,617,365.98

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
ArtSpace Projects Inc.	1/3/2018, 9/11/2017, 3/9/2018, 10/31/2017, 5/16/18	\$267,803.05						\$267,803.05
Victory Crossing	3/1/18	\$37,044.00						\$37,044.00
Hermitage Woods	8/24/2017, 6/30/2018, 6/19/2018	\$189,500.00						\$189,500.00
Bucknell Apartments	3/1/18	\$750,000.00						\$750,000.00
Momentum Apartments	6/20/18	\$3,700,000.00						\$3,700,000.00

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$	\$	\$	\$	\$
\$0	\$667,363.99	\$561,611.23	\$0	\$105752.76

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	46	0	1	2	3	
Dollar Amount	\$11,087,704		\$392,981	\$1,334,587	1,664,435	
Sub-Contracts						
Number	0					
Dollar Amount						
	Total	Women Business Enterprises	Male			
Contracts						
Number	46	1	45			
Dollar Amount	\$11,087,704	\$1,217,511	\$9,870,193			
Sub-Contracts						
Number	0					
Dollar Amount						

Table 8– Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

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

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	172	172
Number of Non-Homeless households to be provided affordable housing units	165	59
Number of Special-Needs households to be provided affordable housing units	15	7
Total	352	238

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	22	22
Number of households supported through The Production of New Units	0	12
Number of households supported through Rehab of Existing Units	291	185
Number of households supported through Acquisition of Existing Units	39	19
Total	352	238

Table 12 – Number of Households Supported

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

Consolidated Plan goals are developed with some flexibility in order to best meet market conditions and partnering opportunities and to maximize the use of funds. Outcomes were somewhat short of expectations with per unit costs coming in higher than expected for several projects as well as a change in the department's focus of funding larger projects.

Projects completed during Program Year 2017 included the rehabilitation of three group homes serving six people with developmental disabilities and extremely low incomes. Progress was less than the plan for 15 homes due to somewhat higher costs (average of approximately \$53,000 compared to \$40,000 expected) and a high level of leadership turnover at several non-

profit partners.

Thirty-six formerly homeless households were able to obtain and retain permanent housing with assistance from the ESG program. The program has a capacity to serve 22 households at any one time and turnover during the year led to more than the target number of households being served but some for less than the full twelve months.

The Focused Neighborhood Assistance Program finished serving 212 residents with neighborhood-level benefits, which was a continuation of the prior year program. The plan for Kimberly Place, to serve 373 households with neighborhood improvements and 51 households with direct home repairs, advanced through the final planning phase, but failed to begin construction on the 51 units included in the one-year goal. This was largely due to contractor issues and delays in permitting.

Discuss how these outcomes will impact future annual action plans.

Despite the factors restricting performance improvement, such as high property and land costs and reductions in state and federal funding sources, the County has renewed its commitment to affordable by increasing local funding for affordable housing in the County FY19 budget (July 1, 2018 – June 30, 2019) to \$51.6 million. Additionally, the Department has committed to the following Performance Improvement Plan:

- Preserve existing affordable housing through aggressive code enforcement and effective utilization of Housing Acquisition and Rehabilitation dollars
- Increase attention to preserving affordable multifamily rental buildings/ developments
- Establish goals for addition of affordable housing to County stock and closely monitor progress on achieving those goals
- Continue aggressive push of closing cost assistance program managed by Housing Opportunity Commission (HOC)
- Pursue prompt completion of development on county owned parcels, i.e., Bowie Mill, Fleet street, Progress Place, and Silver Spring Library Senior Residences
- Promote mixed-use development (e.g., the promotion of housing development in non-residential areas)
- Continue the focus on, and coordination of, housing for those with special needs, e.g. homeless, persons with disabilities, seniors, etc.
- Promote the adaptive use of the County's existing housing stock to reduce demand on new housing: e.g., assist seniors in adapting their homes to meet their needs.

Include the number of extremely low-income, low-income, and moderate-income persons

served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	35	0
Low-income	0	0
Moderate-income	0	0
Total	35	0

Table 13 – Number of Persons Served

Narrative Information

All of the 35 persons served were of extremely low-income.

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

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

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

The Continuum of Care has developed to a coordinated entry system to reach out to assess the needs of persons experiencing homelessness that is accessible 24/7. Three regional offices provide centralized access & four outreach providers work to engage unsheltered persons. The CoC’s standard outreach procedures focus on engaging individuals and families to refer, link, and provide a “warm” transfer to services and housing providers. The CoC has developed an outreach protocol between local police & outreach providers to promote collaboration. A CoC Outreach Coordinator works with outreach providers in the CoC to centralize and coordinate efforts. Every quarter the CoC conducts a “blitz count” to collect data on the number of unsheltered people in the County and identify trends in the data. The CoC has increased the outreach capacity by more than 50% recognizing the need to reach unsheltered individuals. More than 115 “hot spots” identified in the CoC including encampments in the woods, storage bins and 24hr establishments are targeted for outreach. The system is advertised via the County’s 311-phone line, DHHS website, community events, & via a “Homeless Services Guide” available at public libraries, recreational centers, & public schools. All providers can serve persons with limited English proficiency & maintain diverse staff.

The VI-SPDAT tool for individuals and families are used to screen, assess & identify housing needs. HMIS generates a by-name report with each household's vulnerability score. Housing Prioritization committees meets bi-weekly to match households to vacancies & meets weekly to discuss system concerns. Case conferencing is also used with the by-name list to ensure the community is tracking, engaging, and connecting all households experiencing homelessness to potential housing options.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC provides emergency shelter to individuals and families experiencing homelessness throughout the jurisdiction. Emergency shelter capacity for adults without children includes 140 year-round beds including 5 designated for victims of domestic violence, 3 designated for Healthcare for the Homeless, and 2 designated for Aging and Disability. During hypothermia season from November 1 to March 31st, capacity expands to 382 beds. On the day of the 2018 point in time count, there were 309 emergency shelter beds occupied, 169 of which were designated as seasonal or hypothermia overflow beds.

Families with minor children are served by three family shelters with the capacity to serve 27 families with additional 14 families able to be served through the County's domestic violence shelter. In addition, overflow shelter including motels are used to supplement when family shelters are full. During 2018 Point in Time County, a total of 69 families were residing in emergency, overflow shelter, or Domestic Violence shelter.

Transitional shelter and Safe Havens programs provide 160 beds for households without children. On the 2018 PIT County, there were 126 beds occupied, a decrease over the 2017 PIT count. Evaluation of the need for transitional housing will occur as the CoC is investing more in permanent housing solutions.

In addition to providing emergency shelter and transitional housing, the CoC has implemented homeless diversion for both families and singles. Diversion uses empowerment and mediation techniques to assist households with identifying alternative housing solutions outside of emergency shelter. Diversion may include both case management and temporary financial assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that

address housing, health, social services, employment, education, or youth needs

Montgomery County coordinates a network of assistance through the Continuum of Care coordinated entry system that provides emergency financial assistance & case management to help households retain/obtain housing to prevent homelessness. Households with repeated housing instability receive ongoing case management to address barriers contributing to housing instability. Other diversion efforts include mediating family disputes, one-time grants to offset costs to family/friends with whom they can stay, & linkages to mainstream benefits, employment & behavioral health/health resources to reduce risk. DHHS also provides energy assistance to help low-income residents pay their utility costs & operates the County Rental Assistance Program, a shallow rent subsidy program for low-income families, seniors & the disabled. The CoC partners with the Montgomery County Dept of Health and Human Services, public schools, local hospitals, and the Emergency Assistance Coalition to identify those at-risk and prevent homelessness.

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

The CoC has fully implemented a coordinated entry system (CES) for both single adults and families to minimize length of time homeless. This process involves reviewing all screening, assessments, and program policies to ensure that the system is reducing barriers to households experiencing homelessness. The CoC seeks to create a “no wrong door” approach by adding non-traditional partners to the CES including places where people experiencing homelessness congregate such as libraries, hospitals, and jails. The enhanced coordinated entry system includes uniform community-wide standards that prioritize persons for housing, including those with the longest time homeless and highest service needs. CES prioritizes households with the greatest vulnerabilities for permanent supportive housing. Veterans and those experiencing chronic homelessness are prioritized over all other populations. The CoC has sustained “functional zero” for Veteran homelessness since December 2016. Since January 2016, the CoC has housed 390 chronically homeless individuals. To date, only 12 individuals are chronically homeless, and all have been assigned to a housing placement.

Additional strategies to reduce LOH is a significant increase in the number of Rapid Rehousing units. This year, the CoC increased the number of RRH units by 100 units. The CoC has also changed the RRH model that provides a flexible housing subsidy and intensive case

management services for a shorter duration (6-9 months)

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

Actions taken to address the needs of public housing

The Housing Opportunities Commission of Montgomery County (HOC) maintains its Public Housing units to meet or exceed Federal and County housing quality standards (HQS). However, due to years of inadequate federal support of Public Housing, coupled with the advanced age of the properties, HOC's portfolio still has a great need. To address the unmet needs of these sites, HOC is in the process of using HUD's Rental Assistance Demonstration (RAD) program as well as HUD's Section 18 Public Housing Disposition program. These two programs have, and continue to, assist HOC in transitioning out of its participation in Public Housing, by converting these families and properties to either the project-based rental assistance (PBRA) program, or the project-based voucher (PBV) program. The goal of this transition is to reduce HOC's reliance on federal Public Housing funding, while still providing the same high level of service to HOC's resident families and new applicants. HOC's efforts under RAD are also providing the opportunity for HOC to conduct significant renovations of many of its aging Public Housing properties, in some cases adding more and larger units, and in all cases increasing amenities. This transition is expected to take several fiscal years to complete and the exact timing and funding needs will be tied to the timing of HUD approvals at each property. As of September 2018, HOC has converted the majority of its Public Housing portfolio via the RAD program and expects to complete the process over the next fiscal year.

During Program Year 2017, Rockville Housing Enterprises initiated the replacement of all old model hot water heaters in the public housing units at the David Scull community and scattered site communities. The hot water heaters are being replaced with energy efficient tankless hot water heaters.

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

Funding is provided for Public Housing units managed by local municipalities, the Housing Opportunities Commission of Montgomery County (HOC), and the County itself. The goal is a standard of living that is equitable for all residents of Montgomery County. Such a process involves genuine resident input so as to ensure that real concerns are addressed and not simply those that the government perceives to be a problem for the County's Public Housing residents. This resident input is gathered through a variety of means. HOC holds multiple town hall meetings with its residents each year, public hearings, public comment periods, and also has monthly discussions with HOC's own Resident Advisory Board (RAB). HOC's RAB is comprised of HOC residents from across its affordable housing portfolio, including the Public Housing and Housing Choice Voucher programs as well as other HOC programs. HOC staff also reviews many proposed policy changes with its RAB, thereby seeking input from its residents prior to implementing policies which affect them. The topics discussed at these different resident meetings include property maintenance, adequacy of supportive services, property management, administrative

policies, new HOC programming, and general HOC customer service. Numerous self-sufficiency and education programs, supported with public funds, are also provided by HOC, resulting in a greater opportunity for Public Housing and other HOC residents to speak out on those issues affecting their families with regard to their living conditions and other supportive services.

Rockville Housing Enterprises encourages public housing residents' participation in management policy decisions. RHE has a Resident Advisory Board that is consulted regularly on property related issues as well as policy decisions. The Resident Advisory Board has provided insight into the day to day management of the properties including providing input on the parking and towing policies as well as RHE Annual and Five Year plans.

Actions taken to provide assistance to troubled PHAs

Not applicable

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The Planning Board and County Council worked on dozens of zoning text amendments and other regulatory and legal changes during Program Year 2017 that may positively affect housing affordability. Several of these relate to the County's landmark Moderately Priced Dwelling Units (MPDUs) program, further implementing recommendations from the June 2017 Rental Housing Study.

During Program Year 2017 the County earned 47 National Association of Counties (NACo) Achievement Awards for outstanding programs, many of which streamline government services and allow for more efficient and affordable new and existing housing.

An important part of the mission of the Department of Housing and Community Affairs (DHCA) is to maintain a marketplace that is fair to both tenants and landlords. Toward that, DHCA is responsible for inspecting apartment buildings for certain safe housing conditions and promoting tenant rights. Now, through the November 29, 2016 unanimous approval of Bill 19-15, and with improved resources and authority to do the job, DHCA is ratcheting up efforts in ways that benefit everybody. During Program Year 2017 many new housing code inspectors were hired to carry out the provisions of the new law. And in September 2017, Montgomery County Executive Ike Leggett launched a "Renters Have Rights" outreach campaign to inform tenants of stepped-up apartment inspection and expanded tenant advocacy. Increased inspections are a staple of the updated law, but the campaign is more than just announcing inspections. Renters are encouraged to contact DHCA to learn about their rights and DHCA is available to help mediate conflicts between renters and landlords. The Campaign has included ads on Ride On buses, bus shelters and County facilities, doorhangers in apartment buildings, flyers, and social

media.

Montgomery County Department of Permitting Services (DPS) has launched a revised Design for Life (referred to as “DFL” or “Design for Life”) Incentive Program intended to increase the stock of visitable and livable housing in Montgomery County through tax incentives, promotion of Design for Life principles and businesses engaged in providing housing that meets Design for Life standards and through collaboration with stakeholder partners.

In September 2017, Montgomery County Adopted the International Green Construction Code, which represents a major step forward to reduce greenhouse gas emissions and meet climate protection goals. With adoption of the IgCC, Montgomery County establishes a baseline requirement that new, non-residential construction and additions of 5,000 square feet or more must be designed and constructed to reduce building energy use by at least 50% over the average commercial building energy consumption in the base year of 2000. In addition to reducing energy consumption by 50%, projects must mitigate heat island impacts associated with development and divert at least 50% of construction and demolition waste material from landfills. This green building code is a critical step in meeting the County’s commitment to implementation of the County’s Climate Protection Plan.

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

A concerted effort has been made to coordinate with other County agencies and community groups in both the identification of needs and the resources available to meet these needs. The goal, in a time of diminishing resources, is to maximize effect through the elimination of duplication and employment of economies of scale when possible to serve the largest number of residents possible.

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

During the Program Year, the Montgomery County Department of Health and Human Services, through its Childhood Lead Poisoning Prevention Program, continued to:

- Provide case management for children who have blood levels of at least 10 micrograms per deciliter
- Educate and provide outreach to schools, day care centers, landlords, residents and the medical community about lead poisoning
- Monitor the incidence of childhood and environmental lead poisoning and lead poisoning hazards
- Comply with the school mandate that all Pre-K, kindergarten and 1st graders living in identified “at risk” areas have documentation of lead screening on file at their school
- Promote lead-safe environments for children in Montgomery County, and
- Provide a High-Efficiency Particulate Air (HEPA) vacuum loaner service to County residents to help free homes and apartment of lead dust and hazards associated with lead-based paint.

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

This also falls into the category of interagency coordination. DHCA has worked with many agencies

including the Department of Health and Human Services and the Housing Opportunities Commission to identify need and to allocate resources. The public service component of the project list is evidence of the fact that a major priority is to support and, where possible, create self-sufficiency. This is an effort that will not have a satisfactory conclusion until there are no families at or below the poverty level.

Among efforts that help reduce the number of persons living below the poverty level is the Family Self-Sufficiency Program run by the Housing Opportunities Commission (HOC). This program helps Public Housing and Housing Choice Voucher families achieve self-sufficiency and end dependency on welfare assistance over a five to seven-year period. The program serves over 400 families, primarily composed of single female heads of household with an average of two children, who enroll on a voluntary basis and agree to case management services with the goal of improving the head of household's education, career training and employment. HOC also offers residents a chance to participate in the HOC ACADEMY, a program that provides adult education and work force readiness training.

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

Quarterly leadership forums bring managers and key staff from all County departments together to identify opportunities for collaboration and define priorities. In addition, the County has implemented a planning and appraisal process for senior management stressing results-oriented outcomes and pay-for-performance, with an emphasis on teamwork, cooperation, and collaboration to ensure that departments work together.

Interdepartmental teams have been formed. The key ideas embodied in this program are:

- Neighborhood based services customized to neighborhood needs
- Partnership with neighborhood leaders and organizations
- Intervention in at-risk neighborhoods
- Nurturing of involvement and leadership from the multi-cultural community, particularly the immigrant community.

Recognized by National Association of Home Builders for their streamlining work, the Montgomery County Department of Permitting Services credits the launch of the web-based system called eServices as pivotal in the improvement of services. County residents and businesses use "ePermits" and "ePlans" to apply online and electronically submit building and permitting plans to include electrical, deck, new home and right-of-way permits. Launched in 2014, the system is still providing improvements in efficiency. Montgomery County Executive Ike Leggett announced on November 17, 2016 that the commercial permitting processing time had been reduced over the prior two years from an average of 25 weeks to an average of 12 weeks. Plans are completing initial reviews in 20-30 calendar days and solar permits, which have increased dramatically in volume, have a three to five days turn around.

In 2018 Montgomery County again ranks as the healthiest county in Maryland in the annual County Health Rankings (CHR) for Maryland. Healthy Montgomery, the County's community health improvement process, was launched in June 2009 and brings together health providers, hospitals, insurers, County agencies and community members. A second Community Health Needs Assessment was recently completed. Co-chaired by County Councilmember George Leventhal and Jackie DeCarlo, executive director of Manna Food, Healthy Montgomery has work groups focused on such health issues as obesity and behavioral health. The goal is for Healthy Montgomery to continuously update the community's health status and conduct periodic needs assessments to stay focused on improving health outcomes.

During Program Year 2017, the Montgomery County Department of Environmental Protection, WorkSource Montgomery and Montgomery College partnered to sponsor a free training series to prepare workers in the growing green infrastructure industry. The 40-hour course covered topics needed to prepare for the nationally accredited green infrastructure exam. Lisa Feldt, director of the Montgomery County Department of Environmental Protection stated, "Montgomery County is a national leader in stormwater management. I am proud this is the first national training of its kind hosted by Montgomery County. Through the County's partnership with Workforce Montgomery and Montgomery College, we can provide skills to expand our workforce of trained individuals in the design, construction and maintenance of green infrastructure. This training allows us to build our economy, provide a new job development program to our community and create strong partnerships for water quality."

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

DHCA works with many agencies including the Department of Health and Human Services and the Housing Opportunities Commission to identify need and to allocate resources. DHCA works with a number of non-profit organizations providing a variety of social service and housing services, as can be seen in the Action Plan list of projects. The Department also has contracts with housing counseling providers to reach out to those at risk of foreclosure and possibly requiring other services; referrals to appropriate service providers are regularly made. The Montgomery County Continuum of Care process includes wide civic participation and provides a robust forum for coordination between public and private housing and social service agencies.

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

Montgomery County's Office of Human Rights has developed a comprehensive Fair Housing program. This program includes testing for discrimination in the rental or sale of housing and compliance with architectural guidelines for the protection of individuals with disabilities. It also includes educational

components and enforcement activities.

Also, under the auspices of the Office of Human Rights, the County has an on-going Inter-agency Fair Housing Coordinating Group, (IFHCG) which is comprised of agencies that have housing responsibilities. Members of the group include representatives from the Department of Housing and Community Affairs, the Human Rights Commission, Housing Opportunities Commission, Health and Human Services, the Office of Community Partnerships, Commission on People with Disabilities, Montgomery County Public Schools, Montgomery County Park and Planning Commission, the City of Takoma Park, the City of Gaithersburg and the City of Rockville. Meetings are open to the public and individual realtors often attend and join in discussion as well as community advocacy groups to include the Montgomery County Branch of the NAACP.

In County Fiscal Year 2018 / Federal Program Year 2017, fair housing education was provided for housing and real estate professionals (who receive certificates of completion which could be used toward continuing education credits), landlords, tenants, property managers, lenders, and the general public. A fair housing public service announcement developed as part of a public awareness campaign continues its showing at local movie theatres strategically throughout the county and a human rights youth diversity camp was provided to fifth-grade students exploring the topic areas of human and civil rights to include fair housing in the County.

A fair housing poster contest has taken place for a number of years and has become very popular. Conducted as part of the diversity camp, the winner receives a monetary award and the winning poster is displayed on transit buses throughout the County during Fair Housing Month (April of each year).

The Office of Human Rights also provides information concerning scams and other irregularities concerning local and state rental assistance programs in housing (Source of Income). They partner with DHCA by providing Fair Housing activities and workshops on the County's Fair Housing law. DHCA also provides counseling referrals and assistance through local nonprofits on foreclosure, homeownership and various mortgage issues.

The Montgomery County Office of Human Rights (OHR) monitors the County's Fair Housing Ordinance. Through the Inter-agency Fair Housing Work Group, OHR coordinate's the activity of county departments, offices, and agencies to prevent housing discrimination.

CR-40 - Monitoring 91.220 and 91.230

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

Montgomery County receives annual allocations from the federal CDBG, HOME and ESG Programs. Monitoring standards and procedures for each program are described here.

CDBG and ESG activities are monitored according to program requirements. Sub-recipients and contractors are required to submit periodic progress and financial reports and submit quarterly benefit data reports. DHCA staff maintains regular telephone contact with sub-recipients and contractors.

Staff provides technical assistance at the time contracts are drafted to ensure that all contractors are familiar with and understand program requirements. Topics discussed include income/beneficiary documentation, reporting, files and records management, invoicing for payment and timely expenditure of funds. In addition, staff members attend events sponsored by the sub-recipients/grantees related to programs that receive funding.

HOME: Montgomery County is responsible for ensuring that all HOME program funds are used in accordance with the program requirements. The County executes written agreements and performs monitoring of its contractors. The County will monitor all activities assisted with HOME funds to assess compliance with ongoing program requirements.

The County has an internal tracking system for HOME projects that generates requests for information, audits and benefit data reports according to the schedule of required cyclical inspections.

The County is also subject to review by outside auditors. The current contract calls for programmatic and financial audits to be conducted annually.

Monitorings are conducted each year for all contracts. Additional monitorings may be conducted if there is some concern about a grantee's performance or ability to effectively and efficiently carry out its contract duties. These monitorings usually take place in the field at the offices of the grantee, although they are sometimes conducted at DHCA if the grantee is known to the monitor and has an excellent performance record. These sessions average one hour in length and include review of files as well as current procedures/standards as required by HUD. Time is taken for any questions from the grantee as well as for technical assistance as necessary. A monitoring form is completed for each visit and is included in each case file.

Citizen Participation Plan 91.105(d); 91.115(d)

The Citizen Participation Plan covering Program Year 2017 is included as an appendix to this document.

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Consolidated Annual Performance and Evaluation Plan (CAPER) draft is made available to the public for review and comment for 15 days prior to its required submission date to HUD. Notice of availability of the draft for review and comment is posted on the Department's website on both the front page / announcements area and the Department's webpage for the Consolidated Plan / CAPER and Public Service Grants. Notice is also given via email to neighboring jurisdictions and other key County personnel, some of whom include the message on various listserves or outlets. An ad was also placed in the Montgomery Edition of the Sentinel newspaper on September 6, 2018. All notices indicate that a hard copy of the draft is available at the Department's office and also at the five most prominent County library branches distributed throughout the county.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

There were no significant changes in program objectives this year.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants? No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The County has an internal tracking system for HOME projects that generates requests for information, audits and benefit data reports according to the schedule of required cyclical inspections.

At the end of Fiscal Year 2018, the County had 147 HOME-Assisted projects with a total of 598 HOME units.

- In accordance with the record-keeping provisions contained in the HOME regulations, DHCA issues a HOME Compliance Report to all projects with HOME-Assisted units on an annual basis. The written report is reviewed by DHCA to determine each project's implementation of the HUD HOME rent and income restrictions and the affordability terms required by the project's HOME Regulatory Agreement with the County. In FY 2018, DHCA completed the review of Compliance Report submitted by all 147 individual HOME projects. DHCA worked with individual project managers to provide the technical assistance needed to satisfactorily resolve reporting errors or omissions prior to the end of the fiscal year.
- In accordance with the "Minimum Frequency of On-Site Audits and Housing Code Inspections" schedule required by the HOME program, DHCA conducted On-Site Audits of Tenant Files at 37 different HOME projects in FY 2018. DHCA worked with individual project managers to provide the technical assistance needed to satisfactorily resolve reporting errors or omissions prior to the end of the fiscal year.

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

All developers and property managers of HOME-assisted housing are required to adopt and implement an affirmative marketing and outreach plan for all properties with HOME assistance. The County conducts ongoing reviews of each housing development's compliance with its plan throughout the year. As part of this review, the County reviews the development's marketing materials to ensure that the appropriate FHEO logos and statements appear. The County also reviews the content and placement of marketing advertisements to ensure that the development is marketed to those minority groups least likely to apply for residence in the development.

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

IDIS report PR-27 Status of HOME Grants indicates that Montgomery County received \$ 561,611.23 in Program Income during Program Year 2017. Program Income is always used before other funds and all HOME funds are used to support HOME-eligible persons and households earning 80% or less of Area Median Income.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The Moderately Priced Dwelling Unit Program (MPDU), the County's nationally known housing program, continues to ensure that all developments of 20 units or more will contain affordable units. Efforts using HOME funds have emphasized approving projects that serve the lowest income groups possible.

A concerted effort has been made to preserve existing affordable housing through a code enforcement program that results in the annual rehabilitation of dozens of homes. DHCA's Office of Landlord/Tenant Affairs requires licenses for all rental units and provides dispute mediation. It has published a Landlord/Tenant Handbook which spells out the rights and responsibilities of both landlords and tenants. The Office of Landlord-Tenant Affairs works closely with the Housing Code Enforcement Section to ensure tenants have housing that is in compliance with all applicable County laws.

The County continues to use resources from the Montgomery Housing Initiative fund to support rental assistance programs in DHCA, Health and Human Services (HHS), and the Housing Opportunities Commission (HOC). Over 2,500 households were assisted in FY17 and 3,000 are projected to be assisted in FY18.

During the Program Year, DHCA's Office of Landlord-Tenant Affairs handled 715 official landlord-tenant complaints and responded to 9,910 calls through MC311. They also conducted three information seminars on senior housing issues and participated in the Fair Housing program sponsored by the Office of Human Rights.

All of the efforts described above represent a comprehensive effort which is necessary to preserve our affordable housing supply.

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units – Rehabbed	N/A
Number of New Units – Conversion	N/A
Total Number of bed - nights available	34,821
Total Number of bed - nights provided	33,343
Capacity Utilization	96%

Table 24 – Shelter Capacity

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	FY 2015	FY 2016	FY 2017
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 1 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	FY 2015	FY 2016	FY 2017
Expenditures for Rental Assistance	126,591.00	110,174.80	115,959.52
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	31,056.50	21,497.50	36,596.69
Expenditures for Housing Relocation & Stabilization Services - Services	77,543.40	75,333.72	72,332.85
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention	235,190.90	207,006.02	224,889.06

Table 2 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	FY 2015	FY 2016	FY 2017
Essential Services			
Operations	33,894.41	56,075.62	84,075.62
Renovation			
Major Rehab			
Conversion			
Subtotal	33,894.41	56,075.62	84,075.62

Table 3 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	FY 2015	FY 2016	FY 2017
Street Outreach			
HMIS	73,790.55	80,905.20	162,849.20
Administration			

Table 4 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	FY 2015	FY 2016	FY 2017
	342,875.86	343,986.84	471,813.88

Table 5 - Total ESG Funds Expended

11f. Match Source

	FY 2015	FY 2016	FY 2017
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government	342,875.86	343,986.84	471,813.88
Private Funds			
Other			
Fees			
Program Income			
Total Match Amount	342,875.86	343,986.84	471,813.88

Table 6 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	FY 2015	FY 2016	FY 2017
	685,751.72	687,973.68	943,627.76

Table 7 - Total Amount of Funds Expended on ESG Activities



Montgomery County, Maryland

Department of Housing and Community Affairs

Citizen Participation Plan

I. INTRODUCTION

Montgomery County is committed to making local government open, accessible and responsive to its residents. Opportunities for involvement in governmental decision-making and community development issues existed prior to the inception of the Community Development Block Grant (CDBG) program and extend beyond the scope of the federal requirements. This plan outlines procedures the Department of Housing and Community Affairs (DHCA) will follow in support of the County's commitment to resident involvement and in compliance with the Department of Housing and Urban Development's (HUD's) requirements for the Consolidated Plan. This plan is only one component of Montgomery County's extensive and on-going efforts to provide meaningful opportunities for all county residents to fully participate in their government. This plan is reviewed and updated by DHCA staff as needed to reflect changes that enhance outreach and participation efforts.

The Consolidated Plan is a document that is submitted to HUD and that serves as the comprehensive housing affordability strategy and community development plan, and which guides submissions for funding under any of the Community Planning and Development formula grant programs, including the Community Development Block Grant Program, the HOME Investments Partnership Program (HOME), the Emergency Solutions Grant (ESG) Program and the Housing for Persons with Aids program (HOPWA). It should be noted that HOPWA is funded at the regional level and the County's Department of Health and Human Services (DHHS) is the local "program sponsor" responsible for HOPWA funding. Also, beginning in 2012, DHHS and the Department of Housing and Community Development entered into a Memorandum of Understanding whereby DHHS would administer the ESG grant for the foreseeable future. Citizen participation related to ESG funding is implemented through the Continuum of Care (CoC) process and is described in the CoC funding application.

DHCA is the lead agency responsible for overseeing the development of the Consolidated Plan. It is an executive branch agency of Montgomery County Government and its mission is to:

- plan and implement activities which prevent and correct problems that contribute to the physical decline of residential and commercial areas;
- maintain a marketplace which is fair to both landlords and tenants;

- increase the supply of new affordable housing and preserve the affordability of the existing rental housing stock;
- maintain existing housing in a safe and sanitary condition.

II. FEDERAL REQUIREMENTS FOR CITIZEN PARTICIPATION

The citizen participation process in Montgomery County has been designed to meet and exceed minimum federal requirements. The federal requirements which govern the programs administered by the DHCA are published in the Code of Federal Regulations at 24 CFR Parts 91, 92, 570, 574, 576, and 968. The preparation of a Citizen Participation Plan is specifically addressed at 24 CFR 91.105.

INFORMATION

A. Types of information provided

Federal regulations require the dissemination of certain information. This information is:

- The amount of CDBG, HOME, and ESG funds expected to be available;
- The range of activities that may be undertaken with available funds;
- The estimated amount of available funds proposed to be used for activities that will benefit low- and moderate-income persons;
- The proposed CDBG, HOME and ESG activities likely to result in displacement, and the plans and policies developed for minimizing such displacement of persons as a result of its proposed activities; and,
- The types and levels of assistance the grantee will make available (or will require others to make available) to persons displaced by CDBG, HOME, and ESG funded activities, even if the grantee expects no such displacement to occur.

B. Methods of providing information and seeking input

Federal regulations require that information be provided and input be sought in certain ways:

- Public hearings - Two public hearings are required to obtain the views of citizens on housing and community development needs, non-housing community development needs, development of proposed activities, and review of program performance. The public is given a minimum of two weeks notice of the date of the hearings, and at least 30 days to provide written comments.

- Publications - Both a Consolidated Plan and a Consolidated Annual Performance Report (CAPER) are required. The availability of these items is advertised in the local newspaper and disseminated via email to surrounding jurisdictions and to community email groups. Hard copies of the Consolidated Plan and CAPER are made available to the public at DHCA and at five regional libraries to provide the public with an opportunity to comment on community development goals and strategies, the projected use of funds, and the County's performance in meeting its community development objectives. The Consolidated Plan and CAPER are also posted on the DHCA web site and provided in alternative formats upon request. All written comments are considered and included in the final reports. The Office of Community Partnerships continues to lead a county-wide effort to increase participation and access to information among persons with limited English proficiency.

DHCA is continuously exploring alternative public involvement techniques, attending meetings of civic associations and business groups in areas where CDBG funds are proposed to be used and reaching out through non-profit partners, through presentations to the Regional Services Centers' Citizen Advisory Boards and through participation at government-sponsored Town Hall meetings at locations throughout the County and through involvement with other boards, committees or commissions.

Input from county residents is sought in a variety of ways:

- Small group discussions, work groups and task forces are convened around topics such as affordable housing and code enforcement and to address the needs of specific groups, such as seniors, renters, persons with disabilities or the homeless.
- Events like the annual Housing Fair and the Affordable Housing Conference and activities at which DHCA is asked to participate provide opportunities to increase public awareness of community development issues, provide information about county programs (especially CDBG-funded activities), and solicit comments regarding community development needs and performance feedback.
- Community meetings are attended: staff members serve as guest speakers, meet with neighborhood and other special-interest groups, and serve on a variety of committees to explain programs and solicit comments on community development needs, goals, strategies, priorities, and the projected use of funds as described in the Consolidated Plan, as well as to discuss past performance and obtain feedback.
- Interest groups are consulted: staff members solicit input from agencies representing special interest groups, such as the Housing Opportunities Commission (HOC), the Human Rights Commission (HRC), the Department of Health and Human Services (DHHS), the Office of Community Partnerships, nonprofit service providers and others so that the opinions of low-income residents, residents of public and assisted housing, persons with disabilities, those

with limited English proficiency, the homeless and others with special needs are considered in determining needs, setting goals and priorities, and evaluating accomplishments.

- Opportunity for electronic input is provided: both HUD and the County have internet web pages which provide the public with an opportunity to view and comment on relevant information, including the most recent Consolidated Plan. Distribution of information through neighborhood “list-serves,” through email “blasts” and via links from other sites is increasing access to information and the opportunity for input.
- In accordance with federal requirements, the public is made aware of any substantial changes to activities described in the Consolidated Plan, and is provided with reasonable and timely access to information relating to the Consolidated Plan and regarding the use of CDBG, ESG, or HOME assistance received.

III. COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

An advisory committee has existed since 1978 to serve as the formal citizens’ participation body, acting as a link between the county and its residents. The formation of the CDAC is authorized by the County Executive through an Executive Order and staffed by DHCA. Membership on the advisory committee is through a formal recruitment process handled in collaboration and under the direction of staff in the County Executive’s office. Outreach efforts are directed at encouraging diverse membership broadly representative of the county and inclusive of those from areas in which funds are proposed to be used and those of low- and moderate-incomes.

The committee’s primary responsibilities include the following:

- Conducting an annual public hearing related to community development needs, past community development performance, and the development of the Consolidated Plan.
- Reviewing and recommending CDBG projects for funding.
- Reviewing and commenting on the draft Consolidated Plan.
- Making recommendations to the Director of DHCA, the County Executive, and the County Council on the use of CDBG funds for the county.
- Commenting on status reports from DHCA staff on the planning, monitoring, evaluation, and effectiveness of ongoing community development projects, and reviewing any proposed changes to the Consolidated Plan.

IV. MEMBERSHIP

The CDAC is composed of a maximum of 20 members who are broadly representative of the county’s residents, as noted above. Individuals interested in serving on the CDAC are notified

through public advertisements that the committee is seeking new members. Community organizations are also notified of vacancies on the committee, with staff conducting targeted outreach to increase awareness of opportunities for service among those groups that may be under represented on the committee, and who may not be likely to respond to public advertisements. Prospective new members submit letters of interest to the County Executive, who selects and appoints all representatives based on DHCA staff recommendations.

The criteria for appointment is a familiarity with problems of low income neighborhoods in the county, familiarity with or interest in the problems of special needs populations, and a willingness to serve. The degree to which the applicant enhances the diversity of the committee is also a consideration. Persons must be willing to devote a significant amount of volunteer time during the year, particularly during the review and evaluation process of CDBG applications (normally during the months of October and November, and the first week in December).

Those persons who currently serve on a board, committee, or commission established by the County Council or County Executive, or who are county employees, employees of the HOC, the Maryland National Capital Parks and Planning Commission (MNCPPC), or any local government, or who are elected officials of any federal, state, or local government are not eligible for membership on the CDAC.

V. TERMS FOR APPOINTMENT

Members serving on the CDAC are appointed to serve a three-year term. Members may be reappointed by the County Executive no more than once. The Chairperson of the CDAC is designated annually by the County Executive. This appointment is based on leadership abilities demonstrated from the previous year's service on the committee. The Chairperson may serve no more than two years in that role.

VI. HOUSING LOAN REVIEW COMMITTEE

The Housing Loan Review Committee (HLRC) is a diverse group of county staff who are designated by the Director of DHCA to review funding proposals for multi-family housing developments. The committee makes recommendations to the director regarding the allocation of funds and conditions for funding for the proposals. The proposals, from private and non-profit developers, are for loans funded with the County's federal HOME and/or CDBG funds, or local Housing Initiative funds. The loans are used to acquire, rehabilitate, and/or develop additional affordable housing for persons with low and moderate incomes. Currently the committee is comprised of one representative from the Office of Management and Budget (OMB), one representative from the Department of Health and Human Services (DHHS), one representative from the Department of Finance, and three representatives from DHCA. Members of the committee are knowledgeable in affordable housing development, finance, and/or management. All are committed to providing affordable housing to low- and moderate-income persons, including those with special needs. The committee has regular monthly meetings, but may meet more frequently if there are proposals ready for review. Members do not serve for specified terms and recommendations are reached by consensus.

The HLRC has developed threshold criteria and funding preferences for all housing proposals. The committee applies these criteria and preferences to proposals as it develops its recommendations. These comprehensive criteria assess the following aspects of each proposal:

- compliance with the funding program’s mission statement;
- public purpose;
- neighborhood needs assessment;
- financial feasibility and financial need;
- leveraging;
- cost reasonableness;
- total county request;
- project design
- physical assessment (of any existing structures to be rehabilitated)
- market feasibility;
- readiness to go;
- community support;
- availability of support services (if applicable);
- development team capacity; and,
- land use and zoning.

VII. SUBCOMMITTEES

From time to time, the full committees of either the CDAC or the HLRC may create subcommittees to further examine proposed activities and/or may invite others to its meetings for the purpose of providing information or input, thereby broadening the level of public participation.

VIII. HOUSING AND COMMUNITY AFFAIRS PROGRAM INFORMATION

DHCA promotes interest and involvement in the community development program by maintaining a steady flow of information to the community and providing meaningful opportunities for input. Staff attends community meetings and uses visual display boards, maps and a variety of means to convey information. The department has a Limited Access Plan for outreach to persons with limited English proficiency. Information is provided in alternative formats upon request to accommodate persons with disabilities.

Current information about the ESG, CDBG, and HOME programs, the citizen participation process, the amount of funds available, the range of activities which may be undertaken and those that have been previously funded, ineligible activities, the application development and review process, and other important program requirements is provided. This information is distributed widely, especially at the time planning begins for the next program year. Non-profit groups representative of low- and moderate-income persons are given technical assistance in developing funding proposals upon request.

At least two weeks prior to each public hearing, notice is published in easily readable type in one or two newspapers of general circulation. The notice includes the date, time, place, procedures of the hearing, and topics to be considered. Reasonable efforts are made to publicize hearings by other means, particularly to those groups representing persons living in public housing, those who have special needs, such as persons with limited English proficiency, persons with disabilities or those who are homeless. Information is available in alternative formats upon request and hearings are conducted in accessible locations.

Documents relevant to the HOME, ESG, and CDBG programs are available for citizen review in the DHCA offices from 8:00 a.m. to 4:30 p.m. on regular working days.

The following materials are available for review by interested persons:

- All mailings and promotional material;
- Records of hearings;
- All key documents, including prior applications, letters of approval, performance reports, other reports required by HUD, and the approved application for the current year;
- Copies of the regulations and issuances governing the program; and
- Explanation of important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, relocation provisions, and federal labor standards.

Copies of the proposed Consolidated Plan and CAPER are placed in five regional libraries. Additionally, the plan is available for review and public comment on the department's web site. Interested parties are given the opportunity to comment on the draft plan.

A notice which announces that the plan is available to interested persons upon request is published in a newspaper of general circulation 30 days prior to the draft Plan being submitted to HUD for approval.

IX. SCOPE OF PARTICIPATION

DHCA continues to encourage the involvement of county residents in all stages of the planning, implementation, and evaluation process. While there are federal submission deadlines and formal public comment periods with which the county must comply for the submission of certain documents, the process of soliciting public input is ongoing, driven not by time constraints but by the county's commitment to be responsive and accountable to its residents, the county's commitment to continuous improvement in the delivery of services, and the county's commitment to the achievement of results.

X. COMPLAINTS

All unresolved complaints are referred to the Director of DHCA. Reasonable effort is made to provide responses, written where necessary, within 15 working days after a complaint has been received. If a response is not completed within 15 days, the appropriate individual will be contacted and provided an explanation for the delay.

XI. TECHNICAL ASSISTANCE

Technical assistance is provided to:

- Groups representative of persons of low- and moderate-income who request assistance, so they may participate in planning, implementing, and assessing the program.
- Groups representative of low- and moderate- income persons, and groups of residents of low- and moderate- income neighborhoods, which request assistance in developing proposals and statements of views.
- Organizations proposing to provide services to the homeless and other special needs populations.

Technical assistance is provided by DHCA staff members. When necessary or required, DHCA will conduct workshops to provide technical assistance on the various HUD-funded programs it is charged with implementing, including CDBG and HOME.

X. CRITERIA FOR SUBSTANTIAL AMENDMENT

Amendments to the Consolidated Plan are made whenever *any* of the following occur:

1. There is a change in allocation priorities or a change in the method of distribution of funds;
2. An activity not previously described in the action plan will be carried out; or,
3. There is a change in the purpose, scope, location or beneficiaries of an activity.

A change will be considered substantial to the extent that the amount involved in any one change is in excess of \$300,000, and the change would be from one eligible activity to another and the category of beneficiary (e.g. the homeless, the elderly, the disabled) would be altered.

To seek input prior to implementing any substantial change, a notice of the change will be published in a newspaper of general circulation and on DHCA's web page not less than thirty (30) days prior to implementing the change. Written comments will be considered, and a summary of these comments will be attached to the substantial amendment. If a comment is not accepted, the reasons for non-acceptance will be included.

CDAC Proposed Activity Schedule

Activity Schedule
DHCA/CDAC
July 1, 2018 - June 30, 2019

All dates are approximate and subject to change

DATES	ACTIVITIES	COMMENTS
April, 2018	Public announcements for new CDAC member applicants.	Provides open and broad recruitment effort to solicit new members for the Advisory Committee.
Early July, 2018	Briefing session for prospective new CDAC members	Session designed to explain purpose and time commitment involved, and give brief overview of CDBG program and process.
July, 2018	Complete review process for new CDAC members.	Departmental staff interview applicants and make recommendations to the County Executive.
Mid - July, 2018	Proposed project applications available for distribution to applicants for CDBG and HOME Funding.	Providing applications by this date provides applicants ample time to develop a sound proposal. Prior applicants and citizens/groups who have called DHCA to inquire about availability of funds are on a mailing list.
Mid - August to Mid - September, 2018	DHCA prepares preliminary list of Departmental projects and drafts CDBG-Funded Capital Improvement Program (CIP) projects and forwards to Director for review.	Departmental staff reviews ongoing projects and new projects requiring CDBG and HOME assistance obtaining additional information as appropriate.
August/September, 2018	Appointments to CDAC by County Executive.	County Executive makes appointments and designates Chair
By mid - September, 2018	Preliminary CDBG-funded CIP submitted to OMB.	Comply with County budget process for CIP.
Mid - September, 2018	Deadline for submitting project applications for CDBG and HOME (HOPWA funds are distributed via regional allocation).	Proposed project applications accepted by DHCA until close of business.

DATES	ACTIVITIES	COMMENTS
Early October, 2018	Staff reviews of applications received. Solicits comments from appropriate agencies, local governments, and organizations.	Staff determine if projects are eligible and applications complete. Check for duplication of services and evaluate comments of others.
Early October, 2018	Public Notice listing all CDAC meetings distributed to Government Centers, libraries, etc.	Provide broad dissemination of information regarding committee process.
Early October, 2018	Public hearing on community development needs and Grantee Performance.	Provides interested and affected parties an opportunity to express their needs and comment of performance.
Mid - October to December 2018	Staff and CDAC review project proposals	CDAC ranks projects and establishes funding priorities
January, 2019	Director submits CDAC recommendations on proposed projects to County Executive	Finalize budget recommendations for CDBG for County Executive consideration.
Early April, 2019	County Council hearings on proposed budget as presented in the projected use of funds contained in the annual Action Plan.	Provide interested and affected parties an opportunity to comment on CIP and Operating Budgets including associated activities.
Late April, 2019	Proposed Action Plan advertised and made available for citizens and circulated among surrounding jurisdictions and the State for review and comments.	Provide interested and affected parties an opportunity to examine and comment on the draft Action Plan
Mid May, 2019	County Council approval of proposed projects.	Council reviews proposed projects to be funded.
June, 2019	Council formally adopts budget.	
Continuous	Respond in a timely manner to all written inquiries, comments, and complaints about the programs funded through the Consolidated Plan	Provides response to interested and affected parties. Helps identify and resolve problems and misunderstandings.

**MONTGOMERY COUNTY, MARYLAND
DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**EMERGENCY SOLUTIONS GRANT
RAPID RE-HOUSING ASSISTANCE PROGRAM MANUAL**

Effective May 2014

OVERVIEW

The Montgomery County Maryland Department of Health and Human Services will be administrator of the Emergency Solutions Grant (ESG) under a Memorandum of Agreement with the Montgomery County Department of Housing and Community Affairs. Emergency Solutions Grant funds can be used to provide medium and short-term Rental Assistance as well as Housing Relocation and Stabilization Services to help households that are homeless and at imminent risk of homelessness obtain and retain housing.

Based on a review of the needs of the Montgomery County Continuum of Care (CoC), MCDHHS is prioritizing the use of ESG funds for Rapid Re-Housing (RRH) services only. This Rapid Re-Housing assistance will be limited to medium-term rental assistance as well as medium-term housing relocation and stabilization services in order to assist as many households as possible to obtain and retain permanent housing. Eligibility will be determined in accordance with the procedures described below.

A. ELIGIBLE PARTICIPANTS

To be eligible for Rapid Re-housing Services, individual or family households must meet **all** of the following criteria:

1. Household lacks a fixed, regular, and adequate nighttime residence as evidenced by one of the following:
 - a. Primary nighttime residence is not designed or ordinarily used as a regular sleeping accommodation for human beings (car, park, abandoned building, bus or train station, airport, camping ground) **or**
 - b. Living in supervised publicly or privately operated temporary shelter (congregate shelters, transitional housing, hotel/motel paid for by charitable, or government program) **or**
 - c. Individual exiting institution where resided for <= 90 days and who lived in emergency shelter or place not meant for human habitation immediately before entering institution.
2. All household members are a U.S citizen or a "Qualified Alien" as defined by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.
3. Household does not have resources or support networks to resolve homelessness without assistance.
4. Household agrees to work with a Housing Relocation and Stabilization Services Case Manager.

B. ASSESSMENT AND ELIGIBILITY DETERMINATION

Referrals to the Rapid Re-housing Program will be accepted from providers that are part of the Montgomery County Continuum of Care via the CoC's universal Homeless Assessment Tool.

The Rapid Re-Housing Case Manger will conduct an initial evaluation to determine program eligibility including:

1. **Verification of Homelessness** – Households must meet the criteria for literally homeless previously defined above. Homelessness is documented by a written referral from a CoC housing provider in the form of the homeless assessment tool. For individuals eligible under 1.c. above, discharge documentation from the institution should also be obtained.
2. **Documentation of Household Members and Citizenship** - Documentation can include photo I.D., social security card, birth certificate, Alien registration card, citizenship papers, passport.
3. **Verification of Income and Assets** –Income and assets for all household members should be documented for the 30 days prior to the date of application. If source documents are not available, third party verification of assets and income should be obtained. As a last resort, income can be verified using the Self Declaration of Income form.

Assets are cash or non-cash items that that can be quickly converted to cash and includes the real or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant. Assets include:

- a. Amounts in checking and saving bank accounts.
 - b. Stocks, bonds, savings certificates, money market funds, and other investment accounts.
 - c. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
 - d. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.
4. **Lack of Resources to Resolve Emergency** - Evidence of a lack of financial resources and support networks is required through case manager assessment to verify that other options are not available to applicant. This should be verified through comprehensive interview with regards to the following criteria:
 - a. No family or friends can provide sufficient financial assistance to enable household to obtain housing or remain in housing.
 - b. Household assets are insufficient to enable household to obtain/maintain housing or are needed as part of housing plan.
 5. **Ability to Sustain Housing** - Expectation that household has life skills, social stability and income to sustain permanent housing once assistance ends.

Once the assessment process is complete, the RRH case manager will notify the applicant and the referring provider as to the outcome.

Continued eligibility assessed every three months based on program participation to assure that participants are actively working on meeting their housing expenses and stabilizing their housing situation.

C. PROGRAM ACTIVITIES

Emergency Solutions Grant Rapid Re-Housing assistance is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive service needs of households that affect housing stability. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping households develop a plan for preventing future housing instability. To this end, the program will offer Housing Relocation and Stabilization Services as well as medium-term Rental Assistance to participants.

1. Rental Assistance:

Rental assistance is limited to 12 consecutive months in order to assist homeless households to exit homelessness and move into permanent housing. Rental assistance will be provided based on household type as follows:

Single Adult Household:	First month's rent followed by a monthly rental subsidy of \$400 for up to 11 months.
Family Household:	First month's rent followed by a rental subsidy in the amount of \$600 for up to 11 months

First month's rent is defined as the total monthly rent as stipulated in the lease agreement.

It is expected that households exiting homelessness will have very limited income and assets; therefore no minimum contribution toward rent is required for the first month. During months two through twelve, the household will be responsible for paying the difference between the Rapid Re-housing rental subsidy and the contracted rent amount.

Rental assistance is to be made in the form of direct payments to property owners. No payments are made directly to participants.

In order to provide rental assistance, a rental assistance agreement must be signed by the landlord. The rental assistance agreement must set forth the terms of the rental assistance being provided and stipulate that during the term of the assistance, the landlord must provide a copy to the case manager of any notice to vacate, or any complaint used to begin eviction proceedings against the program participant.

Rental assistance cannot be provided unless the rent is equal to or below the Fair Market Rent most recently published by the U.S Department of Housing and Urban Development (HUD) and complies with HUD's standard of rent reasonableness. When calculating these standards, rent is defined as the total monthly rent including occupancy fees and, if the tenant pays utilities separately, the monthly utility allowance established by the Housing Opportunities Commission.

2. Housing Relocation and Stabilization Services:

Housing Relocation and Stabilization Services assist program participants to obtain and retain housing. These services include Housing Stability case management; Housing search and placement (includes inspections) and Financial Assistance.

Housing Stability Case Management will assist participants to overcome barriers to obtaining and retaining permanent housing. Activities include evaluating and re-evaluating program eligibility; counseling; developing, securing and coordinating services; assisting participants to obtain mainstream benefits; monitoring and evaluating progress; providing information and referral to community resources; and developing individualized Housing Stability service plan.

Case Management services will be provided for up to twelve months and will include an initial assessment with a minimum of monthly contacts. The case manager will develop a Housing Stabilization Plan in collaboration with the program participant including identification of community supports and mainstream benefits that will assist the program participant to obtain/retaining housing once the RRH assistance ends.

Housing search and placement includes activities related to locating; obtaining and retaining permanent housing including assessment of housing barriers; needs and preferences; housing search; outreach and negotiation with landlords; assistance submitting applications and understanding leases; assessment of housing for compliance with ESG standards for habitability, lead-based paint, and rent reasonableness; and assistance with obtaining utilities and making moving arrangements.

Financial assistance will be provided to pay for security deposits to help households move into permanent housing. The security deposit is limited to no more than two months rent.

Financial assistance is to be made in the form of direct payments to property owners. No payments are made directly to participants.

3. Limits on Assistance

Upon exit from the Rapid Re-housing program, participants will not be eligible to receive additional assistance from this program for two years from the closure date.

4. Housing Standards

Each housing unit supported by RRH funds must be inspected to assure that it meets minimum Housing Quality Standards and Lead Based Paint Standards prior to the release of funds as follows:

Lead-Based Paint Visual Assessment: Each unit supported with RRH funds that was built prior to 1978 and in which a child under the age of 6 will be residing must be visually inspected for Lead-Based paint unless it meets one of the following criteria:

- a) Unit is a zero-bedroom or SRO-sized unit
- b) Testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint
- c) All lead-based paint has been identified and removed in accordance with HUD regulations
- d) Unit meets any of the other exemptions described in 24 CFR part 35, 115(a).

An initial Lead-Based Paint Visual Assessment and regular annual inspections are required for as long as RRH funds are being used to assist the household in the unit, in accordance with HUD's standards described in the applicable regulations. The owner must provide a notice to occupants if an evaluation and hazard reduction activities have taken place, in accordance with 24 CFR part 35, 125.

A copy of the Lead-Based Paint screening tool and, where required, visual assessment must be included in each participant file.

Habitability Standards: A initial Habitability Standards Inspection must occur prior to the approval of RRH funds for initial rent or for a security deposit. In addition, an annual habitability standards inspection must be conducted for any unit in which RRH funds are being used. A copy of the completed Inspection report is to be included in each participant file.

D. COORDINATION

ESG Rapid Re-Housing Assistance is one part of an extensive network of services and resources available to support households exiting homelessness. To the extent possible, the RRH Case Manager will collaborate with CoC providers and other community providers to help program participants access services and mainstream benefits for which program participants may be eligible.

As the CoC Lead Agency, MCDHHS is able to coordinate rapid re-housing activities with other prevention and rapid re-housing resources in the CoC. The Rapid Re-housing program will be discussed at the CoC's Adult Homeless Teaming Group and Family Homeless Provider Team to share information and solicit referrals.

E. PROGRAM TERMINATION

A Household that violates program requirements can be terminated from the Rapid Re-Housing program. Written notice will be provided to the program participant that will include the reasons for termination and the date of program closure.

The participant will have the right to request a case review of the decision to terminate services by the Special Needs Housing Administrator within 30 calendar days of the date of notification of program closure. As part of the review, the program participant will have the right to present written or oral information documenting why the decision is not warranted. The program participant will be able bring a relative, lawyer or other person with them to the case review. Within 15 calendar days after the case review, the Administrator will send written notice of the decision from the case review.

F. DOCUMENTATION

A record will be created for each participant referred for Rapid Re-housing Assistance. If a client is found to be eligible and appropriate for the program, certain documents must be obtained and placed in the client file. Each file MUST contain:

1. Completed Assessment including outcome of assessment. If household is not eligible, reason why should be indicated;
2. Documentation of Homelessness;
3. Verification of Income;
4. Documentation of Identity and Citizenship status for all household members;
5. Verification of future housing (lease);
6. Verification of property ownership and W-9 from owner of housing;
7. Rent Reasonableness Certification;
8. Documentation of Fair Market Rent;
9. Rental Assistance Agreement;
10. Lead-Based Paint Screening Tool and, if indicated, Visual Inspection Report and Lead-Based Paint Disclosure Information;
11. Housing Habitability Standards Inspection Checklist;
12. Housing Stabilization Plan;
13. Contact notes documenting services and assistance provided.;
14. Copies of payments made to landlord on behalf of participant;
15. Closing Summary;
16. Documentation related to Program Termination.

G. HMIS PARTICIPATION

Information will be entered into the Montgomery County CoC's HMIS database for all participants receiving Rapid Re-housing Assistance.